October, 16th, 2026

To

An Coimisiún Pleanála

Observation submission

in regard to the planning application for the proposed 110kV substation and 110kV grid connection route to facilitate the proposed Lissinagroagh windfarm

Applicant: FuturEnergy Lissinagroagh DAC

Case reference: VA 12.32 4597 (ACP – 324597-26)

Submitted by

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The proposed 110kV substation is planned to be situated in Faughary, Manorhamilton , Co.Leitrim on the proposed Lissinagroagh wind farm site.

The proposed 110kV underground grid connection route is planned to travel through the townlands of Curraghfore, Skreeney, Faughary, Amorset, Clooneen, Milltown, Cornastauk, Srabrick, Cloonaquin, Carrickgeencor, Boihy, Aghameelta, Kilcoosy, Corrudda, Cleen, Tully, Killeen, Killanummery

Cleighran, Fawn, Drumahaire, Drumlease and Carrowcrin in Co.Leitrim and Lavally, Drumee and Ballysumaghan in Co.Sligo to the existing 220kV substation at Srananagh, Co.Sligo.

I'm respectfully requesting the deciding panel of inspectors of An Coimisiún Pleanála to consider my observations when refusing planning permission for the proposed substation and grid connection.

I carefully read and examined certain planning and environmental documents submitted for this project and although it is only a tiny fraction of the overall documentation there are substantial gaps, flaws and contradictions that leave questions about the credibility of the planning application for this project, the Grid Connection, substation and ultimately the proposed Lissinagroagh windfarm project.

My observations are about:

1.Project splitting

The applicants own documents acknowledge that the proposed Lissinagroagh windfarm and the proposed grid connection route and substation are functionally interdependent and constitute a single project.

The entire project constitutes one planning application however because both proposed projects fall under two separate and different sections of the Planning and Development Act and two separate planning applications have to be made.

It appears that there are two separate standards applied for both interdependent yet separate projects both useless on their own if one is granted planning permission and the other not, when it comes data collection for essential surveys.

For the proposed grid connection for example no bird, bat or other mammal or invertebrate surveys have been conducted only incidental sightings were recorded.

The entire project should be assessed together.

2. Concerns about the quality and quantity of surveying and data, collection, documenting and reporting quality.

A careless, unprofessional and questionable data collection methodology and presentation can be seen in relevant documents.

These deficiencies threaten to minimize the impacts the proposed GCR route has on the environment and biodiversity at construction and operational phases. Especially concerning the Special Areas of Conservation at Lough Gill SAC and its sensitive and by EU and Irish law protected species: Atlantic salmon, Lamprey species, Brown trout, White Clawed Crayfish and European otter as well as habitat for eel as these species and the habitat were positively identified in the aquatic survey to be present , Appendix 5- 4 page 60

2.1. Observations from examining document Appendix 5-4 Aquatic Report compiled by Tobin

Tobin provides a " ***baseline information*** *of aquatic habitats and species of ecological importance within the study area of the proposed development and is based on an aquatic survey and associated desktop study"* , page 2

In other words: only one single aquatic survey has taken place on all 28 survey sites. Sites 1 to 12 are on the proposed windfarm site and sites 13 to 28 are directly relevant to the grid connection route (GCR).

Furthermore there was only one single survey time frame, August 25th 2025 to September 5th 2025, page 3, for all 28 sites.

One survey date is not sufficient to gain enough relevant information for project of this scale. Surveying needs to take place at different times of the year to take nesting/ breeding/ spawning seasons into account. So that species evidence and abundance is not missed and further action wrongky concluded.

There was no targeted survey for Kingfisher *(Alcedo atthis),* a bird species protected under the EU Birds Directive Annex I , the Irish Wildlife Act and with an amber conservation status.

There was also no targeted survey for European Otter (Lutra lutra) or on suitable habitat connectivity.

The GCR crosses though 920 m the Special Areas of Conservation Lough Gill SAC. Its sensitive and by EU and Irish law protected species: Atlantic salmon, Lamprey species, Brown trout, White Clawed Crayfish and European otter as well as habitat for eel were positively identified in the aquatic survey to be present , Appendix 5- 4 page 60 but their importance value is likely much higher then taken into account given the limitations of

the survey. Therefor the route selection is questionable and mitigation measures are not sufficient. The displacement and risk of high road mortality of the otters during construction phase is not taken into account in the EIAR, chapter 5 Biodiversity. Otter are a highly mobile species and have a very large territory.

In order to thoroughly assess, consider and manage impacts major infrastructure may have on habitats and animal and plant species comprehensive **baseline ecological surveying** not only baseline information gathering has to take place at predevelopment stage of any major infrastructure project.

This includes desktop studies, habitat mapping and identification, and targeted protected species surveys.

On page 3 of the aquatic report, is stated that "*a sensitive data request for Lisnagroagh wind farm* (note also incorrect spelling of Lissinagroagh) *was issued to the NPWS on 02/04/2025 and to date no data package was received"*. It is unclear what date is meant by "*to date"*.

According to the rules and conditions of requesting sensitive data from the NPWS no data on protected species is to be made publicly available for example in an EIAR. I'd strongly suggest that this is the reason why no data package was received. And this should have been professionally queried by the applicant and taking into consideration for the data collection and timely clarification from the NWPS sought.

The NWPS replies within 20 days from receiving a sensitive data request. It would have been plenty of time to plan and include for example a targeted detailed survey on likely present or expected protected species.

I also question if the grid connection route was also included in the sensitive data request as it is not mentioned on page 3 only the "*Lisnagroagh"* wind farm.

The site selection for the whole aquatic survey is said to correspond with the sites where the GCR crosses a waterbody, page 3.

This is as such not correct as sites 1 to 12 are on the actual windfarm site and not at GCR crossings.

Out of the 16 sites relevant to the proposed GCR construction, permission to access 6 survey sites was not granted (site 20, 23, 25, 26, 27 and 28 stated on pages 46, 52, 55, 56, 57, 58 respectively).

Only limited data was therefor obtained. It is questionable though how, for example, substrate data, channel dimension measurements as well as riffle and flow measurements for sites 20, 25, 26,27, 28 is recorded. See pages 46, 55, 56,57,58 respectively.

Where permission to access a site was not granted a *" visual habitat assessment was conducted from a suitable vantage point (e.g. a road bridge),* page 3.

Only site 23 states that no data could be obtained, page 52.

Comprehensive aquatic data was obtained only from 62.5% of the sites of the GCR making fully informed planning decisions questionable even though on page 5 is stated that "*all watercourse locations were assessed in terms of:*

- *Waterbody width and depth.....*
- *Substrate type*
- *.....cover offering shading".*

For site 27, page 57 and site 28, page 58, the "substrate data" that was somehow obtained despite access to the location not being granted, also does not add to 100% up leaving another question mark on the credibility of the aquatic survey and its reporting.

2.2. Observations on document Appendix 3-1 Preliminary Route Development- Grid Connection compiled by TLI group

This document has the additional title "Route Feasibility Report" showing up on the page headers.

The document shows a deep lack of respect to the nature and scale of the proposed project, by a lack of attention to detail and lack of editing thoroughness and care. It can the seen from the start : the inaccurate spelling of the name of the proposed windfarm.

The correct spelling of the proposed windfarm is **Lissinagroagh.** Not "*Lissnagroaragh*" like on cover sheet and pages throughout the whole document.

Secondly the revision dates of the document appear unclear and confusing, page 2.

Revision 01 seems to be incorrect and it is highly likely it should read 19.01.21.

Thirdly the map on page 4, Figure 1 overall site location map, is incomplete and lacking relevant information.

The legend is incomplete and misleading.

Furthermore there is relevant information missing in this document despite it being mentioned as " *refer to attached drawings 05773-DR-005 & 05773- DR -006for IPP substation locations,* page 5. No drawings are attached. And also on the following pages describing the route options.

Drawings for the various route options are not available, 057733-DR-001 to 057733-DR-008.

A ‘green’ route is mentioned but it is not on the map either.

There are also no locations or maps for the proposed IPP substations available in this document despite being mentioned.

I highly doubt the credibility of this carelessly presented, 5 year-old, 20 page report that is put forward as a document when applying for planning permission . It makes the final route selection look doubtful, very unprofessional and casual.

2.3. Observations on the document 10955 Lissinagroagh Grid Connection Planning Statement , compiled by Tobin

The following discrepancies were observed:

On page 8 *“the GCR route is an underground cable….”* should read “ the grid connection consists of an underground cable”.

On page 11 and on the publicly displayed site notice boards is stated that *“the GCR consists of a 110 kV underground cable”* whereas when it comes to Flood Risk Assessment mentioned on page 42 in Table 4-2 Policy Compliance Response to Grid Implementation Plan (2023- 2028) it is stated that the GCR is ***predominantly*** *installed underground”*.

That begs the question where is the high voltage 110 kV0 cable not installed underground?

On page 12 Bridge 3 is given the wrong drawing number.

It says in the Environmental Assessment paragraph on page 13 *” as such adverse effects associated with the GCR are limited to the construction*

phase". That is a short-sighted and simplistic statement given that the operational phase of the proposed windfarm is 35 year and that the underground cables will be left in place after that time to become part of the national grid.

I would expect that at least some consideration of adverse effects on the environment mainly aquatic life during the operational phase should be given in regards to electromagnetic field and heat emission or if any damage to the underground cable would occur and repair work or investigative work has to be carried out. At least and especially where the underground cable is within the Lough Gill SAC or on the watercourses that drain into Lough Gill SAC.

It is stated that *"All confirmatory European Otter surveys and interventions will be carried out by..."* and *"The survey works and any potential mitigation required will be implemented prior to starting site clearance and any construction works for the GCR", p*age13.

This will put a highly protected species at an extremely high risk of displacement and mortality as mitigation measures would be implemented.

However this is contradicted by a more positive approach when you look at Table 2-1 on page 14 in the first row it is stated that where *"risks are addressed through careful route selection, preconstruction ecological surveys,.....enduring sensitive habitats and species are* ***avoided*** *or adequately protected".*

As mentioned in my observation earlier ecological surveys for protected species have to happen at pre development stages in order to protect vulnerable species.

Conclusion:

Based on my observations on aspects of the submitted documentation the planning application for the proposed grid connection route and substation is inadequate and does not sufficiently cover standards required.

For an interdependent project the submitted paper works severely lacks in detail , thoroughness and consideration for environmental impacts.

It does not justify an approval.

Submitted by Sabine Waniek, October 16th 2026