SAVE DOUGH MOUNTAIN

Submission to An Coimisiún Pleanála

Proposed 110 kV Substation and 110 kV Grid Connection Route to facilitate the Lissinagroagh Wind Farm, Counties Leitrim and Sligo

Applicant: FuturEnergy Lissinagroagh DAC

Case Reference: VA12.324597 (ACP-324597-26)

Electricity Development Application under Section 182A, Planning and Development Act 2000 (as amended)

Related case: PAX12.324290 (ACP-324290-26), Lissinagroagh Wind Farm

Submissions close: 5.30pm, 16 October 2026

Submission Details and Authorship

This submission is prepared and made by Save Dough Mountain, a community group formed by residents of the townlands surrounding Dough Mountain and the wider Manorhamilton area of north County Leitrim, in respect of the proposed 110 kV substation and 110 kV grid connection route to facilitate the Lissinagroagh Wind Farm (FuturEnergy Lissinagroagh DAC), before An Coimisiún Pleanála under case reference VA12.324597.

The submission is made under Section 182A of the Planning and Development Act 2000 (as amended) and Article 217 of the Planning and Development Regulations 2001 (as amended). It addresses (i) the implications of the proposed development for proper planning and sustainable development in the area concerned, and (ii) the likely effects on the environment and on European sites of the proposed development if carried out. The prescribed fee of €50 accompanies it.

The submission has been prepared by the group drawing on the local knowledge of its members and their reading of the application documents, the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS). Each ground is anchored to the applicant's own figures, text and appendices. It is signed below on behalf of the group by its officers.

Name: **Darren Sweeney**
Position: Chairperson

Signed: _____ Date: 15 October 2026

Name: **Joseph Sheeran**
Position: Vice-Chairperson

Signed: _____ Date: 15 October 2026

Name: **Sabine Waniek**
Position: Joint Secretary

Signed: _____ Date: 15 October 2026

Name: **Nuala McNulty**
Position: Joint Secretary

Signed: _____ Date: 15 October 2026

Name: **Ciaran Rock**
Position: Treasurer

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For and on behalf of Save Dough Mountain.

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Section 1: Introduction and Standing

1.1 The Submission

This submission concerns the application by FuturEnergy Lissinagroagh DAC for a permanent 110 kV substation in the townland of Faughary, Co. Leitrim, and a 110 kV underground cable approximately 32 km in length, of which 30.6 km is in the public road corridor, to the existing ESBN substation at Srananagh, Co. Sligo. The works include eleven bridge crossings (eight by in-road horizontal directional drilling (HDD), two by off-road HDD and one within the bridge deck) and eight culvert crossings by open trenching (Site Notice; EIAR Chapter 2, §2.5.8, p.2-24).

The applicant states that this application and the Lissinagroagh Wind Farm application (PAX12.324290) "are functionally interdependent and constitute a single project for the purposes of Environmental Impact Assessment", and that both are accompanied by one EIAR and one NIS (Site Notice). The EIAR was prepared by TOBIN Consulting Engineers; the grid connection design and construction methodology were prepared by TLI Group.

1.2 Who We Are and Standing

Save Dough Mountain is a community group formed by residents of the townlands surrounding Dough Mountain and the wider Manorhamilton area. Its members live, work and raise families in the area that the wind farm, its substation and its grid connection would directly affect. The group made a detailed submission on the wind farm application (PAX12.324290), lodged on 9 July 2026.

The proposed cable route runs from the wind farm site along the L61801 and R282, through Manorhamilton via the R280/Castle Street, and south through Killanummery and Drumahaire to Srananagh (EIAR Chapter 3, §3.7.6, p.3-37). Members of the group live in the area through which the cable would pass.

The group makes this submission as a third party. Its members are persons whose amenity, environment, water supplies and daily use of the public road network stand to be directly affected by the proposed development, and who accordingly have a clear and legitimate interest in its determination.

1.3 Approach

This is a focused submission. It does not repeat every ground raised on the wind farm application. It concentrates on matters specific to the substation and grid connection, and on the respects in which

the applicant's own documents contradict one another on those matters. Where the applicant's documentation is robust, the submission does not contest it. In particular, the submission does not contend that the substation site is on peat: EIAR Chapter 7 records the substation trial pit as clay with no peat, and the submission does not argue otherwise.

1.4 Relationship to Our Submission on the Wind Farm

Because the applicant presents one project, assessed in one EIAR and one NIS, the grounds raised in our submission on PAX12.324290 bear equally on this application wherever they concern the shared EIAR and NIS. A copy of that submission is enclosed as Appendix A so that the Commission has it before it in this case, and its grounds are relied on here in full. The grounds that follow are additional to it and specific to the substation and grid connection.

Summary of Principal Grounds

The grounds are set out strongest first. Each is argued in full in the section indicated.

1 Route selection is not lawfully explained (Section 3). The only route study before the Commission, Appendix 3-1, recommended a different route (UGC Route Option 4) from the one applied for. EIAR Chapter 3 does not disclose that recommendation, describes Option 4 using text copied from Option 3, and records Lough Gill SAC against every rejected route but not against the chosen route, which the NIS confirms lies within the SAC for c. 920 m.

2 Appropriate Assessment and water protection do not address the drilling beneath the River Bonet (Section 4). The NIS screens out HDD because the launch pits are more than 50 m from water; it does not assess the bores themselves, three at each crossing, passing approximately 1.5 m beneath the bed of a river where Atlantic salmon have been recorded, at positions and depths still subject to site investigation, over a groundwater body the EIAR describes as karstified. The only drilling-fluid control shown is a small bund at each pit. The route was screened out of the Water Framework Directive assessment in a single sentence, and the EIAR does not consider that Lough Gill, downstream, is the public drinking-water source for Sligo and North Leitrim.

3 A second wind farm connection is contemplated but not assessed (Section 5). Appendix 3-1 records that a Tullintowel wind farm (76.8 MW) was "also being considered for generation by the client" and advises designing the cable to allow it to connect later. Tullintowel does not appear in the EIAR, the NIS or the cumulative assessment list.

4 Construction effects on the public road network and communities are understated (Section 6). Works estimated at thirty months, full road closures where Stop/Go is not possible, and joint bays that may have to be placed in the wheel track of narrow local roads are assessed as "temporary, slight" without a closure, diversion or joint bay schedule.

5 The application is internally inconsistent on basic parameters (Section 7). The number of HDD crossings, the number of watercourse crossings, the maximum length of open trench and the route length all differ between documents.

6 The grid connection has no purpose independent of the wind farm (Section 2). It should be determined together with PAX12.324290 and should not be approved if the wind farm is refused.

Section 2: The Application and Its Relationship to the Wind Farm

This section sets out why the grid connection cannot be approved on its own merits in isolation from the wind farm it exists to serve.

2.1 The applicant describes the two applications as "functionally interdependent" and as constituting "a single project" (Site Notice; Planning Statement, p.1). The policy case in the Planning Statement is derived entirely from the wind farm. For example, the grid connection is said to support Leitrim County Development Plan policy RE POL 2 "by enabling the export of renewable electricity generated by the Lissinagroagh Wind Farm to the national grid" (Planning Statement, Table 4-3, p.28). No independent function for the substation or cable is identified.

2.2 It follows that if the wind farm is refused, the justification for this development falls away entirely. A 110 kV substation and 32 km of cable in the public roads of two counties, serving no generating station, would not be proper planning and sustainable development. The group respectfully submits that the two applications should be determined together, and that this application should not be approved unless and until the wind farm is approved.

2.3 The point is sharpened by the permanence of what is proposed. The Planning Statement records that a ten-year permission is sought, but that the substation and cable "will not be removed at the end of the useful life of the wind farm project as it will form part of the national electricity network" (Planning Statement, p.12). EIAR Chapter 16 states that they "will be in the ownership of ESB Networks". Permanent infrastructure justified solely by a generating station with a stated operational life of 35 years (EIAR Chapter 2) calls for particular care before consent is given.

2.4 In our submission on the wind farm (Appendix A, Ground 2 and Section 12.4) the group relied on the principle in *O'Grianna v An Bord Pleanála* [2014] IEHC 632 that, where a grid connection forms part of a single project, its environmental effects must be assessed to the same standard as the generating station. This application is where that principle is tested. Sections 3 to 7 below show that, on the applicant's own documents, the connection is assessed to a materially weaker standard than the wind farm. One further example is that, in its response to submissions on the wind farm, the applicant confirms that no dedicated bird surveys were undertaken for the grid connection route, which relies on a desk study and incidental observations (TOBIN, Response to Submissions Report, 9 September 2026, §2.2.45, Item 7, p.121).

2.5 The sequencing of the two applications has also affected public participation in the single project. The period for submissions on the wind farm closed in July 2026; the grid connection application, which names a further 26 townlands along the cable route in Counties Leitrim and Sligo, was not publicly notified until August 2026 (Site Notice erected 19 August 2026). Households along the route who first learned of the project through the grid application had no opportunity to comment on the generating station, the principal component of the same project, within its consultation period. The Commission is asked to ensure that submissions on this application which concern the shared EIAR and NIS are also considered on the wind farm file.

2.6 Conclusion on Section 2

The grid connection has no function except to export power from the wind farm. It should be determined together with PAX12.324290; it should be refused if the wind farm is refused; and, for the reasons in the sections that follow, the assessment of the connection itself does not meet the standard the law requires.

Section 3: Route Selection

This section shows that the account of grid route alternatives in EIAR Chapter 3 is contradicted by the applicant's own route study (Appendix 3-1) and by its own NIS, so that the Commission does not have a reliable statement of the reasons for the route chosen.

3.1 Chapter 3 records Lough Gill SAC against every rejected route, but not against the chosen route

3.1.1 EIAR Chapter 3 describes four underground cable routes to Srananagh (§3.7.6, pp.3-37 to 3-38). For each of the three rejected routes it records the European site: Option 2 involves "works within Lough Gill SAC/pNHA"; Option 3 involves "works within Lough Gill SAC/pNHA"; Option 4 involves "incursions of Lough Gill SAC". For the chosen route, Option 1, Chapter 3 says only that "Most of the route is on public roads, with the exception of a new crossing of the River Bonet through third party lands in Drumlease and Milltown Forest." No European site is mentioned.

3.1.2 The applicant's own NIS states: "Sections of the proposed GCR are located within the boundary of Lough Gill SAC for c. 920m. The trenching of the cable within the public road network includes six existing watercourse crossings (Aquatic site 15, 16, 17, 19, 22, 24) within the SAC along the Bonet River … with an additional eight existing watercourse crossing outside of the SAC boundary which drain into Lough Gill SAC" (NIS, §5.1.1.11, p.57). The Planning Statement repeats the 920 m figure (p.13). The TLI route study likewise records, for Option 1, that the "UGC traverses through sections of (Lough Gill SAC and pNHA)" (Appendix 3-1, p.7).

3.1.3 Chapter 3 therefore presents a comparison in which the European site appears as a disadvantage of each alternative and is absent from the option chosen. That is not an accurate comparison. The group acknowledges that its own submission on the wind farm (Appendix A, §12.4.3) read Chapter 3 as describing the chosen route as avoiding designated sites. That reading was a fair reading of Chapter 3 as written; the NIS shows it to be wrong. The Commission should not be placed in the same position.

3.2 The applicant's own route study recommended a different route

3.2.1 Chapter 3 states that TLI were engaged in 2020 to examine route options and that "The TLI Preliminary Route Development Report is provided as Appendix 3-1" (§3.7.6, p.3-37). That report (TLI ref. 05773-R01-02, June 2021) is the only route study in the application. Its recommendation is

unambiguous: “At this stage of the process the Consultant believes, based on this revision, the preferred route the client should pursue is UGC Route Option 4 (Blue) and carry this option to the next stage” (Appendix 3-1, p.18).

3.2.2 The reasons TLI gave include that Option 4 “will encounter nine bridges with HDD with all to be drilled within the road network”, “minimises to use of the N16 to a length of 1km”, and “avoids traversing Manorhamilton, Dromahair or any other catchment areas between Srananagh and Lissnagroaragh” (Appendix 3-1, p.18). The route applied for passes through Manorhamilton on the R280/Castle Street and through the townland of Drumahaire (EIAR Chapter 3, §3.7.6, p.3-37; Site Notice).

3.2.3 Chapter 3 does not mention that Appendix 3-1 recommended Option 4. It does not explain why the recommendation was not followed, what further study, if any, superseded it, or when the decision to adopt Option 1 was made. Appendix 3-1 itself states that “The routes selected at this stage are indicative only and a more detailed analysis will need to be completed in order to determine the feasibility of each route proposed” (p.19). No such later analysis is included in the application.

3.3 Chapter 3’s description of Option 4 is not a description of Option 4

3.3.1 The paragraph headed “UGC Route Option 4” in Chapter 3 begins “UCG Option 3 is a variation of Option 1 and 2” and then repeats, word for word, the road list and crossing count given for Option 3 (L6184, N16, L62031, R280, R287, R289, L4252 and L5204; “twelve (12) bridge crossings, two (2) other watercourse crossings and multiple culverts”), changing only the length to 36.4 km and the final phrase (EIAR Chapter 3, §3.7.6, p.3-38). Appendix 3-1 gives Option 4 nine bridge crossings, not twelve (pp.15 and 18).

3.3.2 Table 3-8 (pp.3-40 to 3-42) then compares the options across ten environmental factors. For every factor, Option 4 is described as a “Longer route than proposed option with more crossing points and HDD”, while the chosen route has “less crossings and HDD”. On the applicant’s own appendix, that is not correct: Option 4 had nine bridge crossings, all drilled within the road network, while the route applied for has eleven, two of which require off-road HDD through private land (EIAR Chapter 2, §2.4.3, p.2-5). The only comparative basis Table 3-8 offers for rejecting Option 4 is therefore contradicted by the document Chapter 3 cites as its source.

3.3.3 The route applied for has also changed since Appendix 3-1. TLI recorded eight bridge crossings on Option 1 (Appendix 3-1, p.6); the application proposes eleven. The only quantified comparison between the options anywhere in the application is TLI's budget estimate, which puts Option 1 at €27,180,000 and Option 4 at €29,630,000 (Appendix 3-1, Table 2, p.17). The group does not suggest that cost is an illegitimate consideration. But where the environmental comparison presented to the Commission is contradicted by the applicant's own appendix, the Commission is left without a reliable statement of the main reasons for the option chosen.

3.4 The legal requirement

3.4.1 Article 5(1)(d) of the EIA Directive (2011/92/EU, as amended by 2014/52/EU) requires the EIAR to contain "a description of the reasonable alternatives studied by the developer … and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment". In *Holohan v An Bord Pleanála* (C-461/17) the Court of Justice confirmed that the developer must supply information on the environmental effects of both the chosen option and the main alternatives studied, together with the reasons for the choice, even where an alternative was rejected at an early stage.

3.4.2 Option 4 was not merely an alternative studied; it was the alternative the applicant's consultant recommended. An account of alternatives that omits that recommendation, describes Option 4 with text belonging to Option 3, and omits the European site from the chosen route does not meet that standard.

3.5 Conclusion on Section 3

The alternatives assessment for the grid connection is materially inaccurate on the applicant's own documents. At a minimum, the applicant should be required to provide a corrected description of Option 4, an explanation of why the recommendation in Appendix 3-1 was not followed, any later route study relied on, and a comparison of the options that records Lough Gill SAC against the chosen route. Without that information, the EIA of the grid connection is deficient.

Section 4: Lough Gill SAC, Water Protection and the Drilling Beneath the River Bonet

This section shows that the NIS does not assess the principal grid-specific risk to Lough Gill SAC, namely the directional drilling beneath the River Bonet, that the information needed to do so is either deferred or absent, and that the grid route has been assessed neither under the Water Framework Directive nor for its pathway to the public drinking-water supply drawn from Lough Gill.

4.1 What the NIS records

4.1.1 The route lies within Lough Gill SAC (site code 001976) for c. 920 m, with six watercourse crossings inside the SAC and eight more on watercourses draining into it (NIS, §5.1.1.11, p.57). At HDD Site 1, "the GCR deviates from the public road L-2136 for c. 178m and crosses the Bonet River (EPA Code: 35B06)", and one of the launch pits "is located within the boundaries of the SAC" (NIS, §5.1.1.11, p.56 and §5.1.1.11.8, p.74).

4.1.2 The qualifying interests of the SAC assessed in the NIS include Atlantic salmon [1106], sea lamprey [1095], brook lamprey [1096], river lamprey [1099], white-clawed crayfish [1092] and European otter [1355]. The NIS records otter spraints at Aquatic Site 15, which "corresponds to proposed HDD Site 1", and "A spraint and crayfish remains … at Aquatic Site 22 where HDD Site 2 is proposed" (NIS, §5.1.1.11.8, p.74). The conservation attributes engaged include "Larval lamprey in fine sediment" and "Fish biomass available". In its response to Inland Fisheries Ireland on the wind farm application, the applicant adds that Aquatic Sites 15, 17, 22, 24 and 27 on the grid route "were assessed as having a high suitability for Salmon", and that "Atlantic Salmon was identified at Aquatic Site 15", the off-road HDD Site 1 (TOBIN, Response to Submissions Report Part 2, 25 September 2026, §2.1.1, p.3).

4.2 The NIS assesses the launch pits, not the drilling

4.2.1 The NIS disposes of the HDD crossings in a single passage: "The proposed vegetation removal at the HDD Site 1 and 2 to accommodate the launch pits is located >50m from all watercourses. As such, there is no potential for likely significant effects associated with siltation/contamination of watercourses as a result of HDD site 1 and 2" (NIS, §3, p.14).

4.2.2 That reasoning addresses the vegetation clearance at the pits. It does not address the drilling itself. The purpose of HDD is to bore beneath the river: the Construction Methodology states that HDD

"will be implemented to bore approximately 1500mm beneath the waterway and bridge foundations" (Appendix 2-3, TLI ref. 05773-R01-03, p.28). The crossing drawings show three separate bores within a 355 mm bore diameter at each crossing, with a "Min 1.5m Separation between River Bed and Drill Shot"; Bridge 01 is 99 m long and Bridge 08, beneath the "Bonet River An Bhuannaid", is 139 m (Drawings 05773-U-DR-152 and 159, rev. P03). Across ten HDD crossings that is some thirty bores beneath watercourses draining to Lough Gill. A drill passing about a metre and a half beneath the bed of a river where salmon have been recorded, inside a European site, is the activity with a direct pathway to the qualifying interests. Its distance from the water is not 50 m but 1.5 m. The NIS contains no assessment of it, and the applicant's September response to IFI repeats the same 50 m reasoning (Response Part 2, §2.1.1, p.3).

4.3 The depth and ground conditions at the crossings are not yet known

4.3.1 For each HDD crossing the Construction Methodology states: "This depth is based on locating a suitable clay/silt formation for HDD and the required depth may increase subject to geotechnical investigations" (Appendix 2-3, pp.28 to 33). The crossing drawings go further and state: "Position of HDD launch/reception points will be selected following site investigations and detailed design" (Drawings 05773-U-DR-152 and 159). Neither the depth, nor the alignment, nor the location of the pits and compounds at each crossing is therefore fixed, and the investigations that would fix them have not been carried out or are not before the Commission.

4.3.2 EIAR Chapter 8 records that "the Killarga GWB underlies the proposed HDD river crossing location on the GCR" (§8.3.2.3, p.8-45), and that "The Killarga GWB and Killarga south GWB is karstified", with groundwater flowing "through fissures, faults, joints and bedding planes" (§8.3.2.1, p.8-41). The NIS itself warns that in this karstified aquifer "Any contamination of surface water is rapidly transported into the groundwater system, and vice versa" (NIS, §5.1.1.11, p.56).

4.3.3 Drilling under pressure through fissured limestone is the setting in which drilling fluid is most likely to escape along fractures to the surface or into the watercourse, an event commonly called a frac-out or inadvertent return. The applicant's own documents establish the karst setting and establish that the ground conditions at the crossings remain to be investigated.

4.4 The drilling fluid controls address only fluid that returns to the pits

4.4.1 The crossing drawings show, at the pits, a "Fluid and extracted frac out containment area" in the form of a "Bund area 2 m (w) x 3 m (l) x 1.2 m (d)", and note an "Annulus around ducts containing

residual drill fluid & cuttings" (Drawings 05773-U-DR-152 and 159). The applicant has therefore recognised that frac-out can occur. But a bund at the rig contains only fluid that returns to the pit. It does nothing about fluid lost through fissures, gravels or the riverbed between the pits, which is where a breakout beneath a watercourse occurs. The composition of the drilling fluid is not stated in the grid application; the Construction Methodology says only that "The drilled cuttings will be flushed back by drilling fluid to the steel box in the entry pit" (Appendix 2-3, p.27). The applicant's response to submissions on the wind farm now states that "Inert (i.e. non-toxic) drilling fluids such as bentonite or bioclear are utilised in HDDs with recovery of fluid at the reception pits" (TOBIN, Response to Submissions Report, 9 September 2026, Table 2-3, item 13, p.45). That statement is not part of this application, does not fix the fluid to be used ("such as"), and confirms that the controls proposed deal only with fluid recovered at the pits. No drilling-pressure limits, fluid-loss thresholds, shut-down triggers, watercourse monitoring during drilling, or response to a release beneath the channel are set out in the drawings, the Construction Methodology or the NIS. The applicant's September response to IFI does not address drilling fluid at all.

4.4.2 Inland Fisheries Ireland advised at scoping that "All instream works or other works which may impact directly on a watercourse should only be carried out during the open season which is from 1st July to 30th of September" (EIAR Appendix 1-2). The culvert crossings are to be made by open trenching "with either an undercrossing or an overcrossing, depending on the depth of the culvert to be confirmed during pre-construction surveys" (EIAR Chapter 2, §2.5.8.1, p.2-24). The method at each of the eight culverts, and therefore its effect on the watercourse, is not yet fixed.

4.5 The grid route was screened out of the Water Framework Directive assessment in one sentence

4.5.1 The applicant's WFD Assessment states: "The GCR and TDR work areas were screened out of the WFD assessment due to the limited work areas associated with these components", which are said to "pose negligible risk of compromising WFD objectives or causing deterioration in nearby water body status" (EIAR Appendix 8-1, §2.2, p.26). It also states that "No instream works are proposed on the GCR or TDR" (§2.1.1, p.9).

4.5.2 A route that crosses sixteen waterbodies (EIAR Chapter 8, §8.3.1.2.2), drills some thirty bores beneath watercourse beds, crosses eight culverts by open trenching by a method still to be decided, and runs for 920 m inside a European site, has not been shown to involve only "limited work areas"

with “negligible risk”. Appendix 8-1 contains no reasoning to support that conclusion beyond the sentence quoted, and does not address the HDD crossings. The Commission should not treat the grid connection as having been assessed for compliance with Article 4 of the Water Framework Directive.

4.6 Lough Gill is the public drinking-water source downstream

4.6.1 The River Bonet “flows into the lake from the south-west after flowing through Dromahair”, and “The drinking water for the Sligo and Environs Water Supply Scheme and North Leitrim Regional Water Supply Scheme comes from Lough Gill” (Local Authority Waters Programme, Lough Gill Priority Area for Action Desk Study, catchments.ie). Every HDD crossing of the Bonet and its tributaries is therefore upstream of a public water supply serving Sligo and north Leitrim.

4.6.2 Uisce Éireann asked at scoping that, for developments with potential impacts on its drinking water sources, applicants “must detail measures to prevent negative effects during construction and operation, identifying hydrological pathways between the applicant’s site and receiving waters” (EIAR Chapter 8, Table 8-1). The EIAR instead limits its assessment to a study area of “200 m from the proposed GCR works” (§8.2.2) and concludes that “there are no known surface water abstractions within the proposed study area” (§8.3.1.6). The WFD Assessment records Lough Melvin as a lake Drinking Water Protected Area but makes no corresponding finding for Lough Gill (Appendix 8-1, §2.1.3, p.25). On the wind farm application, Uisce Éireann has sought six conditions “to ensure appropriate safeguards are included to protect the downstream drinking water receptors”, which the applicant accepts (TOBIN, Response to Submissions Report, 9 September 2026, §2.1.10, p.65). The grid route, which crosses the Bonet and its tributaries upstream of Lough Gill, has no equivalent assessment. The pathway from the crossings to the Lough Gill abstraction has not been assessed.

4.7 The legal requirement

4.7.1 Under Article 6(3) of the Habitats Directive, the Commission may approve the development only after having ascertained that it will not adversely affect the integrity of Lough Gill SAC, which requires that no reasonable scientific doubt remains as to the absence of such effects (*Waddenzee*, C-127/02). The assessment must contain complete, precise and definitive findings and conclusions, and may not leave matters bearing on the integrity of the site to be resolved after consent (*Holohan*, C-461/17).

4.7.2 An NIS that does not assess the drilling beneath a river within the SAC, in a karstified setting, at a depth still to be determined by investigation, at positions not yet selected, with no drilling fluid specification and no response to a breakout beneath the channel, does not contain complete, precise

and definitive findings on that pathway. Nor can the gap be filled by conditions requiring a method statement after consent, since that would defer to a later stage the very information on which certainty depends.

4.8 Conclusion on Section 4

On the information before it, the Commission cannot ascertain that the HDD crossings of the River Bonet will not adversely affect the integrity of Lough Gill SAC. The group submits that this is a ground on which approval should be refused. If the Commission is minded to seek further information instead, it should require, before any decision: geotechnical investigation at each HDD crossing and the fixed position of each bore and pit; the drilling fluid specification; an assessment of inadvertent return risk in the karst setting; drilling-pressure limits, shut-down triggers, watercourse monitoring and a response plan for a release beneath the channel; the method to be used at each culvert; a WFD assessment of the grid route; an assessment of the pathway to the Lough Gill drinking-water abstraction, in consultation with Uisce Éireann; and a revised NIS that assesses these matters, open to public comment.

Section 5: A Second Wind Farm Connection Contemplated but Not Assessed

This section draws the Commission's attention to a second wind farm referred to in the applicant's route study, and asks that its relationship to the proposed infrastructure be clarified before any decision.

5.1 What Appendix 3-1 records

5.1.1 The TLI route study records that the exercise "also included an examination for the feasibility of routing an option to bring onstream Tullintowel Windfarm which is also being considered for generation by the client" (Appendix 3-1, p.5). The client named on that report is Coillte. The applicant is owned by FuturEnergy Ireland, "a Coillte and ESB joint venture company" (EIAR Chapter 3, §3.6, p.3-9).

5.1.2 TLI considered a shared connection, noting the maximum export capacities ("Lissnagroaragh 81.6 MW and another for Tullintowel 76.8 MW") and that a shared connection back to Srananagh "will require 1600sq Al to sufficiently carry the MEC of both windfarms" (p.14). It advised that "an arrangement to connect Tullintowel onto the grid via the Lissnagroaragh to Srananagh UGC could be facilitated by appropriately siting straight through Joint Bays" so that the cable could later be broken and teed into a substation at Tullintowel (pp.14 and 18). It also advised that the Lissinagroagh route "can be screened out for planning whilst keeping the arrangement around Tullintowel as a separate entity" (p.18).

5.2 What the EIAR and NIS do not record

5.2.1 Tullintowel is not mentioned in EIAR Chapter 3, in the list of plans and projects considered for cumulative assessment (EIAR Appendix 1-6), or in the NIS. The Planning Statement does not mention it.

5.2.2 The applicant has since stated, in its response to submissions on the wind farm, that "it is currently understood that another wind farm project with turbines of similar scale is proposing to use the same route as this project for a significant part of the TDR" (TOBIN, Response to Submissions Report, 9 September 2026, §2.1.1.7, p.5). That project is not named and does not appear in the cumulative assessment. The applicant therefore knows of at least one further wind farm in prospect that would share infrastructure with this project.

5.3 Why it matters

5.3.1 The substation and cable are to be permanent parts of the national grid (Planning Statement, p.12). If the cable, the joint bays or the substation have been sized, specified or located so as to allow a future connection from a Tullintowel wind farm, then that wind farm is a project whose in-combination effects fall to be considered under Article 6(3) of the Habitats Directive, which extends to other plans and projects and is not confined to those already consented, and whose cumulative effects should be addressed in the EIAR. It would also bear on the *O'Grianna* principle that a single project is not to be assessed in parts.

5.3.2 The group does not allege that a Tullintowel wind farm is currently proposed; it does not know. But the applicant's own appendix records that one was under consideration by the applicant's shareholder, and advises designing this very infrastructure to accommodate it while keeping it separate for planning purposes. That is a matter the Commission is entitled to have explained.

5.4 Conclusion on Section 5

The applicant should be required to state: (a) whether a Tullintowel wind farm, or any other generation that might connect to this infrastructure, remains under consideration by the applicant, FuturEnergy Ireland, Coillte or ESB; (b) the conductor size of the proposed cable, and whether the cable, joint bays or substation are designed to accommodate any further connection; and (c) if so, why that project is not included in the cumulative and in-combination assessments.

Section 6: Public Roads, Construction and Community Effects

This section addresses the effects of installing 30.6 km of 110 kV cable in the public roads of north Leitrim and south Sligo, which the EIAR assesses as slight and temporary without the information needed to support that conclusion.

6.1 The scale and duration of the works

6.1.1 The cable would occupy the L61801, R282, R280, L2136, L21361, N16, L2169, L4166, L4165, R289, L8269, L8260, L4260, L82561, L4263, L4262 and L42621 (EIAR Chapter 16, Table 16-18). The route passes through Manorhamilton on the R280/Castle Street (EIAR Chapter 3, §3.7.6, p.3-37).

6.1.2 The Construction Methodology states that "the overall start-to-finish duration is estimated to be thirty months" for the substation and grid connection works (Appendix 2-3, p.36). The Planning Statement does not state a construction duration and describes the effects on local communities as "generally short-term and localised" (Planning Statement, p.15).

6.2 Road closures and diversions

6.2.1 The Construction Methodology states that one lane will be kept open by Stop/Go control "Where road widths allow", and that "Where it is not possible to implement a 'Stop/Go' system a full road closure will be required" (Appendix 2-3, p.17). EIAR Chapter 16 confirms "temporary closures of sections of affected local roads and temporary lane closures on the affected regional roads, including the R282 and R280" (§16.8.2.5, p.16-39), and concludes that the effect will be "temporary, slight, negative" (Table 16-19).

6.2.2 No schedule identifies which roads, or which lengths of road, will be closed, for how long, or by what diversion. On rural local roads a closure may mean a diversion of many kilometres for residents, farm traffic, school transport, milk collection and emergency services. Without that information the "slight" conclusion is an assertion rather than an assessment.

6.3 Joint bays in narrow local roads

6.3.1 Joint bays, pre-cast concrete chambers typically 2.6 m by 6 m by 1.75 m, are to be installed "approximately every 700m to 850m along the route" (EIAR Chapter 2, §2.5.8.2, p.2-24). Over 30.6 km of public road that implies in the order of 36 to 44 joint bays, each with an associated communications chamber. The EIAR states that joint bays "will be located in the non-wheel bearing strip of roadways

where possible, however given the narrow profile of local roads this may not always be possible" (ibid.).

6.3.2 The Department of Transport, at scoping, "Highlighted that installation of underground cables within public roads may affect road stability, maintenance operations, available road space, and future development potential" and "Emphasised the need to avoid impacts on bridges and culverts, minimise jointing infrastructure within carriageways, and ensure coordination with road authorities" (EIAR Chapter 16, Table 16-1). The application does not identify where the joint bays will be, or how many will be in the wheel track. The cable, unlike the construction works, will remain beneath these roads permanently.

6.3.3 The only Road Safety Audit in the application is a Stage 1 audit of the wind farm's "separate permanent site access junctions" (EIAR Appendix 16-2, §1.1, p.4). It does not examine the grid connection route, the cable works or the traffic management proposed on the 30.6 km of public road. Even at the wind farm accesses it identified narrow roads, steep junction gradients and visibility issues. No equivalent safety audit has been carried out for the roads that would carry the cable works.

6.4 Water services in the road corridor

6.4.1 The TLI route study notes that water utility services are present within a large majority of the roads along the routes considered (Appendix 3-1, pp.7, 10 and 15), and the drawings include watermain undercrossing and overcrossing details (Drawings 05773-DR-128 and 129). Many households in this area depend on group water schemes and private supply pipes laid in or along the public road. The application does not identify them or say how interruption to supply will be avoided or managed.

6.5 The construction noise baseline

6.5.1 As set out in our submission on the wind farm (Appendix A, §8.8), the baseline noise environment for the whole 32 km route rests on spot measurements at six locations on a single day, 2 December 2025, with an instrument for which no calibration certificate is provided (EIAR Appendix 9-4). That is a thin basis on which to discount construction noise along a route through Manorhamilton, Killanummery and Dromahair.

6.6 Conclusion on Section 6

The construction effects of the grid connection on the public road network, on water services and on the communities along the route are assessed as slight without the information needed to support that conclusion. If the Commission is minded to approve, the applicant should first provide a road-by-road programme; a schedule of proposed closures, durations and diversion routes; the proposed location of every joint bay, identifying any in the wheel track; an inventory of water services in the road corridor with measures to maintain supply; and pre- and post-construction road and bridge condition surveys agreed with both county councils.

Section 7: Internal Inconsistencies in the Project Description

This section sets out basic parameters of the development on which the applicant's own documents disagree. Individually some are small; together they mean the Commission cannot be confident of what it is being asked to approve.

Parameter	What the documents say	Source
In-road HDD crossings	"eleven (11) existing bridge crossings are required, of which eight (10) will involve in-road HDD". Eight plus two off-road plus one in-deck is eleven; ten plus two plus one is thirteen.	EIAR Ch.2, §2.5.8.1, p.2-24; Ch.3, §3.7.6, p.3-37
Watercourse crossings	"A total of 16 waterbodies will be crossed by the GCR"; "sixteen (11) watercourse crossings"; eleven bridges plus eight culverts (nineteen); fourteen crossings within or draining to Lough Gill SAC.	EIAR Ch.8, §8.3.1.2.2; Ch.16, §16.8.2.5; Site Notice; NIS §5.1.1.11
Maximum open trench	"No more than a 100m section of trench will be opened at any one time"; "no more than 250m of trench open at any one time".	Appendix 2-3, p.17; EIAR Ch.16, §16.8.2.5
Route length	33.5 km for the chosen route; approximately 32 km.	EIAR Ch.3, §3.7.6, p.3-37; Ch.2, §2.5.8
HDD depth	Approximately 1,500 mm beneath the waterway, but "may increase subject to geotechnical investigations".	Appendix 2-3, pp.28 to 33
HDD pit positions	Entry and exit points are drawn for planning, but "Position of HDD launch/reception points will be selected following site investigations and detailed design".	Drawings 05773-U-DR-152, 159
Culvert method	Undercrossing or overcrossing "depending on the depth of the culvert to be confirmed during pre-construction surveys".	EIAR Ch.2, §2.5.8.1, p.2-24
Option 4 description	Paragraph headed Option 4 reproduces the Option 3 text, including twelve bridge crossings; Appendix 3-1 gives nine.	EIAR Ch.3, p.3-38; Appendix 3-1, pp.15, 18

7.1 The number of watercourse crossings is not a clerical matter. It determines the number of locations at which sediment, drilling fluid or other pollution may enter watercourses draining to Lough Gill SAC, and therefore the scope of both the EIA and the Appropriate Assessment. Likewise, the length of trench open at any one time governs the extent of exposed ground and the duration of disruption at each location.

7.2 Conclusion on Section 7

The applicant should be required to provide a single, consistent schedule of every watercourse crossing, stating its location, the watercourse, whether it is within or drains to a European site, and the crossing method, and to confirm the maximum length of open trench. The assessments should then be checked against that schedule.

Section 8: Conclusion

Save Dough Mountain respectfully submits that the proposed substation and grid connection should be refused, for the following principal reasons:

8.1 On the information before it, the Commission cannot ascertain, beyond reasonable scientific doubt, that the directional drilling beneath the River Bonet within Lough Gill SAC will not adversely affect the integrity of that site, because the NIS does not assess the bores themselves, the positions and ground conditions at the crossings remain to be investigated, and no drilling fluid specification or response to a breakout beneath the channel is provided; and the grid route has not been assessed under the Water Framework Directive or for its pathway to the Lough Gill drinking-water abstraction (Section 4).

8.2 The description of reasonable alternatives does not meet the requirements of Article 5(1)(d) of the EIA Directive, because it omits the route recommended by the applicant's own consultant, misdescribes that route, and omits the European site from the route chosen (Section 3).

8.3 The grid connection has no function independent of the Lissinagroagh Wind Farm, and should not be approved if that application is refused, for the reasons set out in our submission on PAX12.324290 (Appendix A) or otherwise (Section 2).

In the alternative, and at a minimum, the group submits that no decision should be made until the applicant has provided, and the public has had the opportunity to comment on, the further information identified at the end of Sections 3 to 7, including a revised NIS.

The group also asks that this application be determined together with PAX12.324290, and that the Commission engage with each of the grounds raised, as it is required to do (*Balz v An Bord Pleanála* [2019] IESC 90).

The group thanks the Commission for considering this submission.

Appendix A: Save Dough Mountain Submission on PAX12.324290

Enclosed: Save Dough Mountain, Submission to An Coimisiún Pleanála on the proposed Lissinagroagh Wind Farm (PAX12.324290), lodged 9 July 2026, 142 pages. Its grounds are relied on in this submission to the extent that they concern the shared EIAR and NIS.

Appendix B: Application Documents Relied On

Document	Reference used in this submission
Site Notice (erected 19 August 2026)	Site Notice
10955 Lissinagroagh Grid Connection Planning Statement	Planning Statement
EIAR Volume II, Chapters 2, 3, 7, 8 and 16	EIAR Chapter n
Appendix 1-2 EIAR Scoping Responses	Appendix 1-2
Appendix 1-6 Relevant Plans and Projects Considered for Cumulative Assessment	Appendix 1-6
Appendix 2-3 Construction Methodology, 110kV Substation and Grid Connection (TLI, 05773-R01-03, Rev 03)	Appendix 2-3
Appendix 2-4 Construction Environmental Management Plan	Appendix 2-4 / CEMP
Appendix 3-1 Preliminary Route Development, Grid Connection (TLI, 05773-R01-02, June 2021)	Appendix 3-1
Appendix 9-4 Baseline Noise Survey for Grid Connection	Appendix 9-4
Natura Impact Statement	NIS
Planning drawings 05773-DR-126 to 129 and 05773-U-DR-152 to 162	Drawings