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An Coimisiún Pleanála

Re: Proposed Lissinagroagh Wind Farm
SID PAX12.324290 | ACP Case Number 324290
Private Development — REDIII Application
14 Wind Turbines, County Leitrim

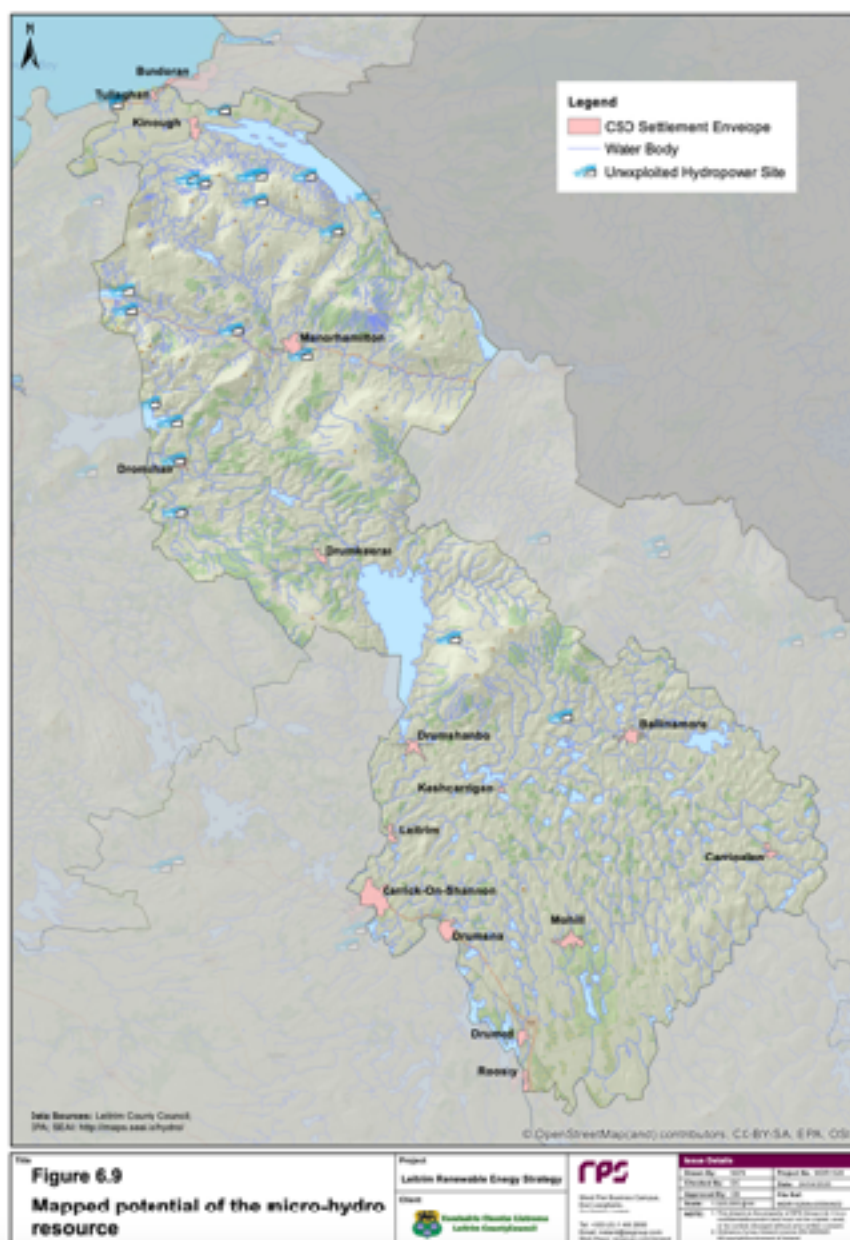
Development Description: 10 year planning permission for Lissinagroagh Wind Farm consisting of 14 no. wind turbines and all associated infrastructure

Development Address: located in the townlands of Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherny, County Leitrim.

Dear Board,

This is a submission on behalf of Adrienne Diamond and Graham Robertson. We request the Board to refuse this planning application.

We wish to state clearly that we are fully supportive of renewable energy and the transition to a low-carbon future. However, we strongly contend that this specific development, in this specific location, is the wrong choice and that the evidence supports refusal on multiple grounds.



2. Non-Compliance with the SEA Directive

The Board's attention is drawn to the decision of the Court of Justice of the European Union in Case C-24/19, which is directly relevant to this application. The jurisdiction to permit this type of development must be considered in light of the requirements of Directive 2001/42/EC and the CJEU's interpretation of it in June 2020.

3. The Leitrim Development Plan 2023–2029

The Landscape and Visual Capacity Study, referenced in Appendix 10 Part A of the Leitrim Development Plan, concludes clearly that there is very limited capacity to absorb further wind turbine development in the county. The study identifies the following characteristics of the landscape that make it particularly vulnerable:

- Scenic and expansive qualities
- Remote, tranquil and wild character, with an absence of man-made influences
- Intervisibility with adjacent landscapes and distinctive skylines
- Complex, rugged landform
- Small-scale field patterns in which wind turbines would dominate
- Proximity of settlements for which upland areas provide an important setting

This application does not meet the development management standards set out in Section 13.20.1 of the Leitrim County Development Plan 2023–2029.

4. Wind Turbine Noise and Human Health

The development management standards of the Leitrim County Development Plan require that noise limits be consistent with the 2018 World Health Organisation Environmental Noise Guidelines, which recommend keeping wind turbine noise below 45 decibels Lden — equivalent to 37 decibels LA90, as established by renowned acoustician Dick Bowdler and widely accepted across industry, including by the Australian Independent Scientific Committee on Wind Turbines.

The 2019 Draft Wind Energy Development Guidelines remain in effect and have never been revoked. The Minister for Housing, Local Government and Heritage has consistently committed to adhering to WHO standards for wind turbine noise. This application must be assessed against those standards.

It is also noted that if a noise limit of 38 decibels LA90 were applied, geospatial modelling carried out jointly by the Department of Housing and RPS indicates that available land would amount to a wind energy capacity of less than 3GW — significantly below the national target of 9GW onshore wind. The incompatibility of that national target with required public health protections is a matter the Board should weigh carefully.

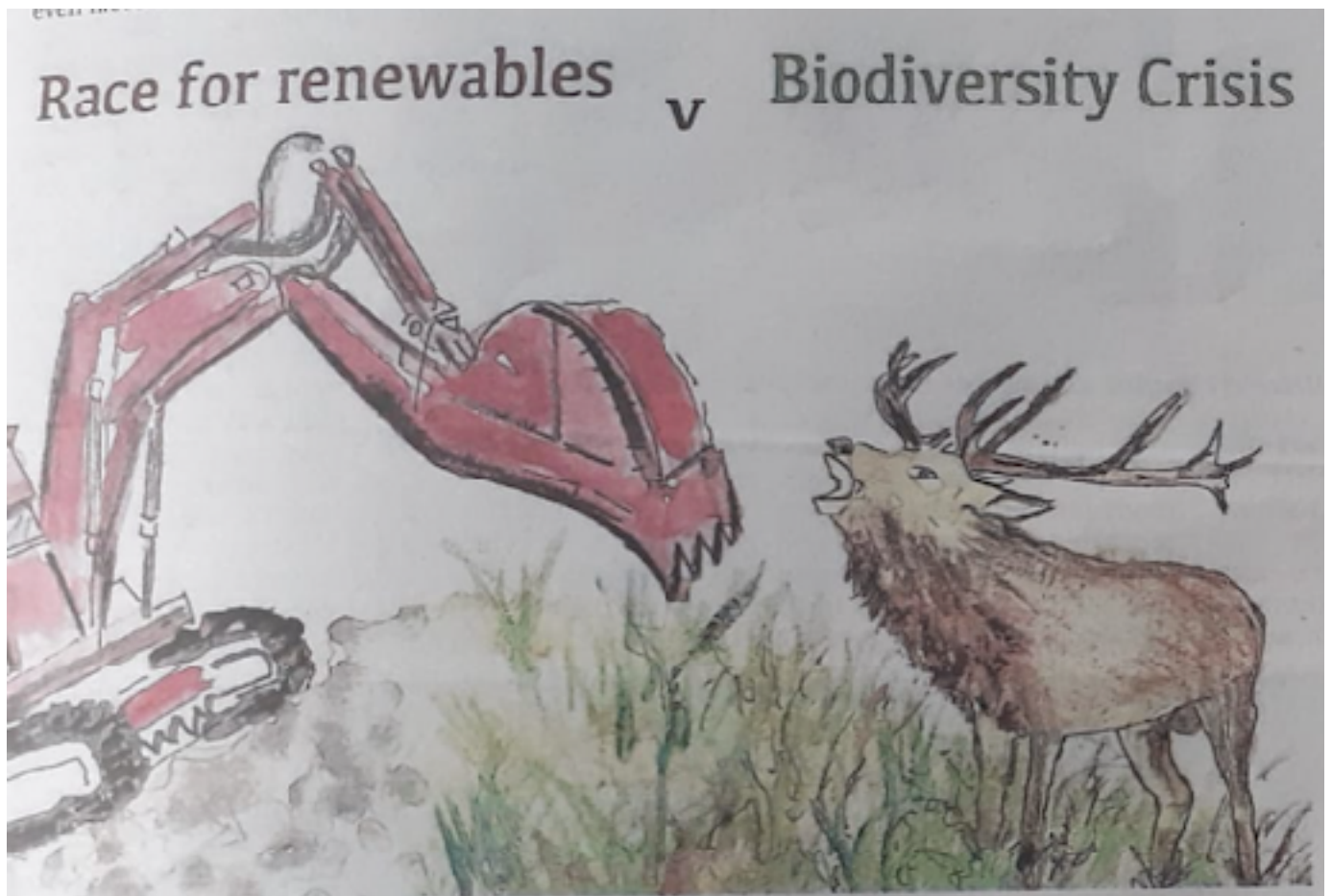
5. Shadow Flicker

The HSE has recommended that a planning condition for the elimination of shadow flicker be put in place for any wind farm development. The planning authority must give this recommendation due weight. Should it choose to disregard it, a clear and reasoned justification must be provided.

6. Grid Capacity

EirGrid has confirmed that the existing electricity transmission infrastructure in the North West is at or near capacity. There are currently no areas in the region where new wind turbines would be considered acceptable in principle. Adding further generation capacity to an already constrained grid is not a solution it is an additional burden.

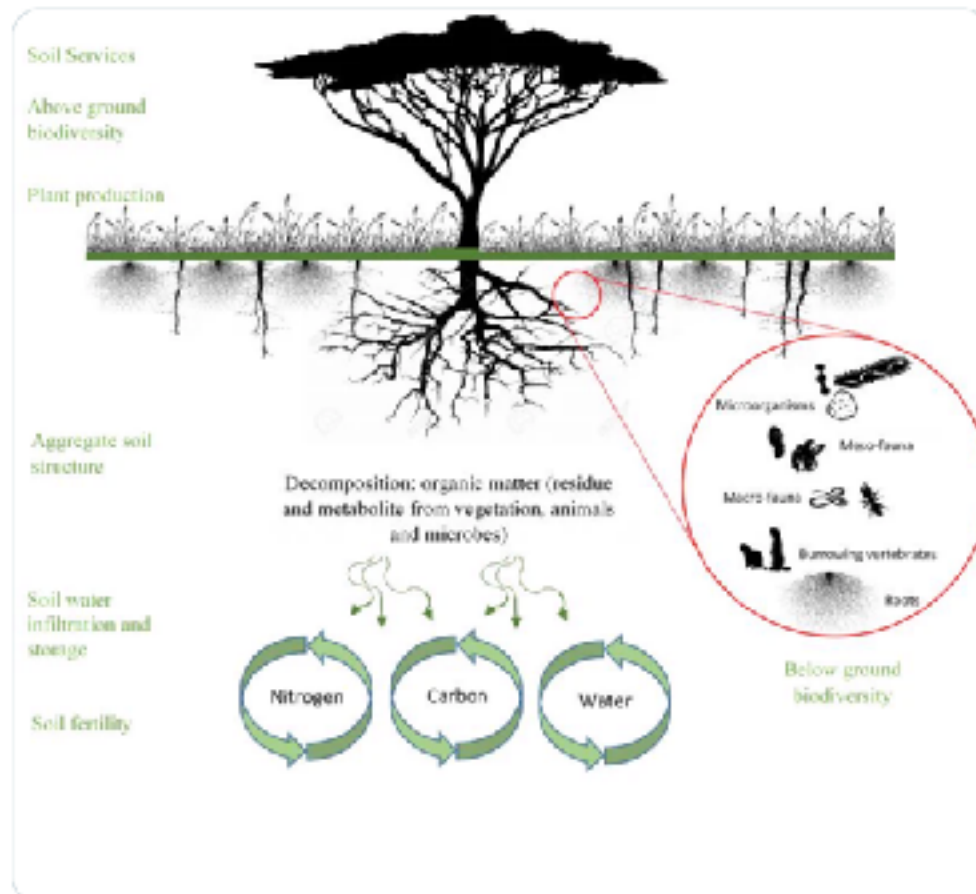
7. Renewable Energy versus Biodiversity



Soil biodiversity represents one of the largest carbon stocks on Earth and plays a major role in fighting [#ClimateChange](#).

But with around a 1/3 of the world's land already degraded, we need to keep soils healthy.

Our Issues Brief explains how bit.ly/3ISZ2pT



The Board is asked to weigh carefully the tension between the race for renewables and the biodiversity crisis. Soil biodiversity represents one of the largest carbon stocks on Earth. With approximately one third of the world's land already degraded, the irreversible impact of large-scale wind farm infrastructure on fragile upland habitats, peatland and soil biodiversity must be fully assessed and given appropriate weight.

Concluding Observations

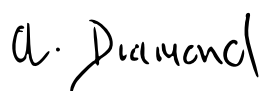
The above points present clear and well-evidenced grounds for refusal. Leitrim has contributed more than its fair share to Ireland's renewable energy targets. Its fragile landscape has reached full capacity for wind energy development. Alternative renewable energy sources identified in the Leitrim Development Plan provide a credible and less damaging path to meeting remaining targets.

If this development were to proceed, the impact on the local environment, the landscape and the surrounding communities would be profound and potentially irreversible.



An Coimisiún Pleanála is respectfully urged to refuse planning permission for this application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Diamond'. The signature is written in a cursive, flowing style with a large initial 'A'.

Adrienne Diamond