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An Coimisiún Pleanála

64 Marlborough Street,
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Submission on a Strategic Infrastructure Planning Application

Re: Proposed Lissinagroagh (Dough Mountain) Wind Farm Development

Applicant: FuturEnergy Lissinagroagh Designated Activity Company

Development: Renewable Energy Development comprising a 14-turbine wind farm and associated works

Case reference: PAX 12.324290

Date: 9 July, 2026

Dear Sir or Madam,

As a local elected representative, and as a person living very close to the proposed wind farm, I wish to make this submission in relation to the proposed development of 14 wind turbines on Dough Mountain.

I do not object to the development of wind energy where it is properly aligned with the objectives set out in Ireland's national energy and climate action plans, the Leitrim County Development Plan, and where it genuinely reduces the likelihood of climate change. However, it is essential that any proposal for a wind energy project is properly scrutinised through the planning process, and that where serious concerns are raised, those concerns are assessed lawfully, fully, and transparently.

This submission addresses concerns that have been raised with me, and that I share, regarding the nature and scale of this proposed development, its environmental impacts, and its potential impacts on the health and wellbeing of people living in the affected community, within which I also live. I am aware of the significant work undertaken by people in North Leitrim to articulate these concerns. Numerous detailed submissions have already been prepared, setting out the issues in depth.

The sheer scale of this proposal has created many of the difficulties that the people of Leitrim are now laying out before the Commission. The applicant's apparent drive to maximise the potential of the lands available to it, in order to achieve a project of up to approximately 100 MW, may have resulted in an unnecessary and excessive scale of development. Turbine locations are now proposed in deep peat, on insufficiently assessed karst geology, and within a sensitive and largely pristine environment that should be protected rather than exploited.

The balancing of the need to protect people, nature and climate, while creating strategic infrastructure, is surely at the centre of assessing this project. In the drive for more and more energy, the Commission must ask whether this proposal is genuinely helping to solve the climate crisis, or whether it is simply helping to chase the growing demand of large energy users.

The planning statement claims that:

“The proposed development will contribute significantly to Ireland’s transition away from imported fossil fuels. In 2024, fossil fuels accounted for over 80% of Ireland’s energy supply, with oil alone comprising nearly half. The proposed development has the potential to produce up to between 222,591 and 291,393 MWh (Megawatt hours), equivalent to the annual electricity use of between 52,998 and 69,379 Irish households, which will increase the share of domestically produced renewable energy and reduce reliance on carbon-intensive imports. The proposed development, with its installed capacity of between 77 MW and 100.8 MW, directly supports this goal. Wind energy already accounts for over 33% of Ireland’s electricity supply and has driven significant emissions reductions. This proposed development will accelerate progress toward national and EU climate targets.”

That statement of policy context is incomplete as it is also evident that there is a serious and unresolved conflict between the Commission for Regulation of Utilities’ 2025 Large Energy Users Connection Policy and Ireland’s climate and energy targets. Under that policy, large energy users will be required to reach 80% renewable power supply within six years of operation. However, this does not resolve the central problem of increased total energy demand.

Teresa Bonserio and Hannah Daly have produced a working paper on the impact of data centres in Ireland. While the results are preliminary, and the paper has been made available for open scholarly discussion, it is important that this work is brought to the Commission’s attention.

Total final energy consumption is a key metric within European energy policy. Under Article 4 of the Energy Efficiency Directive, Ireland is legally bound to reduce final energy consumption to 10.451 Mtoe by 2030, a 13% reduction from 2023 levels of approximately 12 Mtoe. The Directive requires an absolute reduction in final energy use. Therefore, efficiency improvements alone are not sufficient if they are offset by aggregate demand growth.

Baseline projections demonstrate that Ireland is heading for a projected overshoot of the 2030 target. The capacity expansion enabled by the Large Energy Users Connection Policy risks exacerbating that gap significantly. The policy is projected to add 8.1 TWh of demand by 2030, equivalent to approximately 0.7 Mtoe. If realised, this would increase projected 2030 final energy consumption from 13.0 Mtoe to 13.7 Mtoe, widening the projected compliance overshoot from +2.5 Mtoe to +3.2 Mtoe, or approximately 31% above the binding limit. The long-term trajectory is even more severe. By 2040, the incremental demand generated by new data centres is projected to reach 35.2 TWh, or approximately 3.0 Mtoe.

I ask that the Commission consider section 15(1)(d) of the Climate Action and Low Carbon Development Act 2015 or find another way to make sure true climate objectives are being served. While Government has set out competing policies in relation to digital growth and climate mitigation, the Climate Action and Low Carbon Development Act places obligations on relevant bodies when making decisions, including decisions relating to the mitigation of greenhouse gas emissions and the furtherance of the national climate objective.

Where the Commission for Regulation of Utilities' Large Energy Users Connection Policy could be leading to projects that are out of sync with the environments in which they are being proposed, the Commission should give careful consideration to appropriate scale. It should recognise that there are competing policies at play. It should also be prepared, where necessary, to remove unsuitable parts of projects by condition, or to refuse permission for projects that are oversized, excessive, or bloated, particularly where scaling up has led to the inclusion of unacceptable or unnecessary environmental and human health risks.

Ireland has an abundance of renewable energy potential, but we have also set a final energy use limit of 10.451 Mtoe. That limit exists because there are real-world environmental and planetary boundaries. Where an unsustainable growth policy seeks to rely on climate mitigation policy to push beyond environmental limits, the Commission should treat this as a real and material planning issue. It must understand the sacrifices being asked of the environment and community in Leitrim.

Where excessive exploitation or environmental risks may be proposed, for example in relation to deep peat excavation, disturbance of carbon sinks, and risks to possible hydrogeological links with Special Areas of Conservation, the Commission must hold the line between genuine

climate mitigation that reduces the likelihood of climate change and the pursuit of endless growth where renewables only contribute to meeting demand along with fossil fuels rather than instead of them.

Some of the issues exacerbated by this conflict on Dough Mountain include:

- Unnecessary pressure on people's right to enjoy their environment;
- Unnecessary and avoidable risks of biodiversity loss;
- Unacceptable effects on birds, including protected bird species;
- Unnecessary deep peat excavation and disturbance, including the risk of landslide and damage to important peat carbon sinks;
- Risk of pollution to two Special Areas of Conservation, both of which include rare fish species and provide drinking water;
- Pressure on landscape character and visual amenity.

Leitrim County Council has established renewable energy targets. These targets arise within the framework of the Climate Action and Low Carbon Development Act. The underlying objective of renewable energy targets is climate mitigation.

The Council defines climate mitigation as follows:

“Climate mitigation consists of actions to reduce the likelihood of climate change occurring or reduce the impact if it does occur. This can include reducing the causes of climate change such as current and future greenhouse gases emissions. Examples of these include reductions in energy use, switching to renewable energy sources and enhancement of carbon sinks, as well as reducing future risks associated with climate change.”

Continued support for windfarms in Leitrim could be at risk where damages associated with such projects are absorbed by the people and the environment locally, but where the climate benefits don't materialise. Good planning is going to be very important.

As a relevant body under the Climate Action and Low Carbon Development Act, the Commission is required to consider these matters carefully. I ask that the Commission seek to get the balance right.

There is a line between reducing the likelihood of climate change occurring and simply feeding the demand of large energy users.

I hope the Commission can find that line.