
An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Submission on the Strategic Infrastructure Planning Application

Re: Proposed Lissinagroagh (Dough Mountain) Wind Farm

Applicant: FuturEnergy Lissinagroagh Designated Activity Company

Proposal: Construction of a renewable energy development comprising 14 wind turbines together with associated infrastructure.

Case Reference: PAX 12.324290

Date: 9 July 2026

Dear Sir/Madam,

I wish to make this submission as both a local councillor and a resident living in close proximity to the proposed Dough Mountain wind farm.

I support the development of renewable energy where projects are appropriately designed, comply with national climate and energy policy, align with the Leitrim County Development Plan, and make a genuine contribution to reducing greenhouse gas emissions. However, these objectives must be balanced with rigorous planning assessment. Where legitimate concerns arise, they deserve careful, transparent and lawful consideration throughout the decision-making process.

The issues outlined below reflect concerns that have been consistently raised by local residents and which I also share. They relate to the scale of the proposal, its environmental consequences, and the possible effects on the health, wellbeing and quality of life of those living in the surrounding area, including myself. I acknowledge the considerable effort made by members of the North Leitrim community in preparing detailed submissions addressing these matters, many of which examine the technical issues in significant depth.

A central concern is the overall scale of the proposed development. It appears that the applicant has sought to maximise the generating capacity of the available land, aiming for an installed capacity of approximately 100 MW. In doing so, the proposal has expanded into areas where significant environmental constraints exist, including deep peat deposits, potentially sensitive karst geology and an exceptionally valuable natural landscape. These locations warrant protection rather than intensive development.

The Commission is tasked with balancing the delivery of strategic renewable infrastructure against the need to protect communities, ecosystems and the wider environment. While Ireland requires additional renewable energy, it is equally important to ask whether developments of this scale are genuinely advancing climate action or primarily responding to the increasing electricity demands of major commercial consumers.

The Planning Statement accompanying the application states that the project would significantly contribute to Ireland's transition away from imported fossil fuels. It notes that fossil fuels accounted for more than 80% of Ireland's primary energy supply in 2024 and estimates that the proposed wind farm could generate between 222,591 and 291,393 MWh annually, supplying electricity equivalent to the needs of approximately 53,000 to 69,000 households. It further states that the proposed installed capacity of between 77 MW and 100.8 MW would contribute towards Ireland's renewable energy targets and support national and European climate objectives.

While these statements reflect established policy objectives, they do not fully acknowledge an important policy tension that has emerged through the Commission for Regulation of Utilities' 2025 Large Energy Users Connection Policy. Under that framework, large electricity users are required to source 80% renewable electricity within six years of commencing operations. Although this increases renewable generation, it does not resolve the wider issue of continually rising overall energy demand.

Recent research by Teresa Bonserio and Hannah Daly, presented in a working paper examining the impact of data centres on Ireland's energy system, deserves careful consideration. Although the research remains subject to academic discussion, it raises important questions regarding the interaction between expanding electricity demand and Ireland's legally binding climate commitments.

One of the key indicators within European energy policy is total final energy consumption. Article 4 of the Energy Efficiency Directive requires Ireland to reduce final energy consumption to 10.451 Mtoe by 2030, representing a 13% reduction from approximately 12 Mtoe recorded in 2023. Compliance depends upon reducing overall energy use rather than relying solely on efficiency improvements.

Current projections suggest Ireland is already at risk of exceeding this limit. The expansion enabled through the Large Energy Users Connection Policy has the potential to widen this gap considerably. Forecasts indicate that the policy could add approximately 8.1 TWh of additional electricity demand by 2030, equivalent to around 0.7 Mtoe. This would increase projected final energy consumption from approximately 13.0 Mtoe to 13.7 Mtoe, leaving Ireland around 31% above its legally binding target. Looking further ahead, projected additional demand from new data centres could reach 35.2 TWh by 2040, equivalent to approximately 3.0 Mtoe.

In considering this application, I respectfully ask the Commission to have regard to Section 15(1)(d) of the Climate Action and Low Carbon Development Act 2015, together with any other relevant statutory provisions that ensure planning decisions advance Ireland's national climate

objectives. While Government policy seeks both economic growth through digital infrastructure and climate mitigation, the Act places clear obligations on public bodies to ensure their decisions contribute towards reducing greenhouse gas emissions and achieving national climate targets.

Where policies supporting major electricity consumers result in renewable energy projects that are disproportionately scaled or poorly suited to their receiving environment, this becomes a material planning issue. The Commission should therefore consider carefully whether every aspect of the proposed development is justified. Where necessary, unsuitable elements should be omitted through planning conditions or, where appropriate, permission should be refused where developments are excessive in scale or introduce unnecessary environmental or public health risks.

Ireland possesses significant renewable energy resources, but it has also established legally binding limits on overall energy consumption. Those limits recognise that environmental systems have finite capacity. Where policies promoting unlimited demand rely upon climate mitigation measures to justify increasing environmental impacts, this conflict should be recognised as an important planning consideration. The implications for the environment and for communities in North Leitrim deserve careful scrutiny.

Particular attention should be paid where the proposal involves substantial peat excavation, disturbance of important carbon sinks, or risks to groundwater systems potentially connected to nearby Special Areas of Conservation. Renewable energy should contribute towards reducing emissions overall, not simply facilitate ever-increasing electricity demand while fossil fuel use continues elsewhere in the system.

Among the principal concerns arising from the current proposal are:

- Significant impacts on residents' ability to enjoy their local environment;
- Increased and avoidable risks to biodiversity;
- Potential adverse impacts on protected bird populations;
- Extensive excavation of deep peat, with associated risks including carbon loss and peat instability;
- Potential impacts on two Special Areas of Conservation, including risks to protected fish species and drinking water resources; and
- Harm to the landscape character and visual amenity of the area.

Leitrim County Council's renewable energy policies have been developed within the framework established by the Climate Action and Low Carbon Development Act. Their purpose is to support meaningful climate mitigation while protecting environmental quality.

The Council defines climate mitigation as actions that reduce the likelihood or impacts of climate change, including reducing greenhouse gas emissions, improving energy efficiency, increasing renewable energy generation and protecting carbon sinks.

Continued public confidence in renewable energy development within County Leitrim depends upon projects delivering genuine climate benefits while avoiding unnecessary harm to local communities and the natural environment. If environmental costs are borne locally without corresponding climate gains, support for future renewable energy development may be undermined. Sound planning decisions are therefore essential.

As a public body exercising statutory planning functions under the Climate Action and Low Carbon Development Act, the Commission has an important responsibility to weigh these competing considerations carefully.

There is an important distinction between renewable energy developments that genuinely reduce the likelihood of climate change and developments whose principal effect is to satisfy ever-growing electricity demand from large energy users.

I respectfully ask the Commission to ensure that this distinction remains central to its assessment of the proposed Dough Mountain wind farm.

Yours faithfully,

Cllr James Gilmartin

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