

To: An Coimisiún Pleanála

Re: Observations on the Proposed Lissinagroagh (Doagh Mountain) Wind Farm

Applicant: Futureenergy

Case reference: PAX12.324290

I make this submission objecting to the proposed Lissinagroagh Wind Farm.

To be precise, my objection is to the grant of permission in its entirety. That includes the proposed 10-year permission period, the proposed 35-year operational life, the wind turbines, access roads, borrow pits, turbine delivery route works, biodiversity enhancement lands, substation and grid connection infrastructure, all associated works, and any failure to assess the complete, functionally interdependent project as one integrated development.

I respectfully request that An Coimisiún Pleanála refuse permission. I support renewable energy. I support Ireland generating more clean electricity. The question is not whether Ireland needs renewable energy. It plainly does. The question is whether this particular development, in this particular location, is appropriate, proportionate, lawful and environmentally sound.

In my respectful submission, it is not.

This is not a modest renewable-energy proposal. It is an industrial-scale wind farm on a sensitive upland peatland landscape, close to a Natural Heritage Area, with hydrological links to protected European sites, and with recorded ecological constraints including hen harrier, bats, marsh fritillary butterfly, otter, peatland habitats, watercourses and sensitive upland hydrology.

In my respectful submission , the industrial scale of this development requires assessment of this application following the new Wind Energy Development Guidelines, not the 2006 Guidelines.

1. The correct legal and planning approach

This application should be assessed rigorously by reference to the Habitats Directive, the Birds Directive, the EIA Directive, national planning law, the Leitrim County Development Plan, proper planning and sustainable development, and the precautionary principle.

The question is not whether the applicant has made an effort to reduce harm. The question is whether An Coimisiún Pleanála can be satisfied, on the basis of complete, precise and definitive scientific evidence, that the project will not adversely affect the integrity of any European site, either by itself or in combination with other plans or projects.

If reasonable scientific doubt remains, permission cannot lawfully be granted under Article 6(3) of the Habitats Directive.

That is the key issue in this application.

The applicant's own documents identify serious risks before mitigation. The applicant then relies on buffers, curtailment, habitat enhancement, compensation lands, translocation,

postconstruction monitoring, farm plans, future biodiversity management plans, landowner compliance, adaptive management and remedial action.

That is not the same as eliminating risk at source.

2. Project interdependence and grid connection

There is a further serious issue which should be addressed at the outset: the relationship between the proposed wind farm and its grid connection.

The Environmental Impact Assessment Report identifies an underground grid connection route extending approximately 32 kilometres from the proposed wind farm to the existing ESB Networks substation at Srananagh. The environmental footprint of the project therefore extends well beyond the turbine site itself. It includes substantial linear infrastructure crossing a range of landscapes, habitats, watercourses, roads, communities and ecological receptors.

A broad reference at scoping stage to an underground grid connection is not necessarily the same as proper consultation on a developed route with identified crossings, constraints and likely effects. Bodies responsible for water quality, fisheries, ecology, protected habitats and cross-border environmental matters can only comment properly where they have adequate information on the route and the receptors it may affect.

This is particularly important because the wider project area contains sensitive hydrological, ecological and geological features. The application documentation identifies protected habitats, hydrologically connected watercourses, sensitive aquatic environments, peatland systems and areas of geological significance. The grid connection route is therefore not secondary or merely ancillary. It forms an important part of the environmental assessment of the project as a whole.

Given the applicant's own position that the wind farm and grid connection constitute a single, functionally interdependent development, I respectfully request that An Coimisiún Pleanála ensure that all direct, indirect, cumulative and in-combination effects arising from the complete project are fully considered. Particular attention should be given to the combined effects of turbine construction, peatland disturbance, drainage and hydrological alteration, electrical infrastructure, watercourse crossings, road works and associated construction activities across the wider receiving environment.

The issue is not that the grid connection has been wholly omitted from the application documents. The real issue is whether the detailed grid route, its environmental constraints and its likely effects were sufficiently developed, consulted upon and assessed as part of the complete project before this application was lodged.

For that reason, I say the application is premature unless An Coimisiún Pleanála is satisfied that the complete wind farm and grid connection project has been properly defined, properly consulted upon and properly assessed as one integrated development.

3. The applicant's own documents confirm serious ecological constraints

The applicant's Non-Technical Summary states that the baseline receiving environment includes ecological features of local to international importance, including peatland habitats and protected species such as bats, otter and marsh fritillary butterfly. It further states that the proposed project is hydrologically connected to protected European sites, most notably Lough Gill SAC and Lough Melvin SAC.

That point should frame the assessment of the entire application.

This is not a clean, low-risk, low-sensitivity site. It is a constrained upland site with peatland, protected species and hydrological pathways to European sites.

The same documents confirm that the project relies on a long list of mitigations.

The Board should not be reassured by the length of the mitigation schedule. On the contrary, the number and nature of the proposed measures demonstrate the scale of the ecological problem.

A development that can only proceed by relying on compensation, translocation, future farm plans, operational curtailment, monitoring and adaptive management is not a development where risk has been clearly avoided.

4. Hen harrier: displacement is admitted, and compensation is not avoidance

The hen harrier issue is one of the strongest reasons for refusal. The applicant's own documents identify a likely significant effect on breeding hen harrier before mitigation and compensation. That likely significant effect relates to displacement of birds from nesting and foraging habitat during the operational phase.

This is not a speculative concern raised by objectors. It is acknowledged in the applicant's own material.

The hen harrier is not a casual or incidental species. It is a scarce and protected raptor. The presence of one or two breeding pairs in this area is highly significant. The loss, displacement or reduction of nesting and foraging opportunity cannot be treated as a minor residual issue.

The Board should also treat collision modelling with caution. The applicant may predict low collision risk, but the central hen harrier issue is not just collision. It is displacement, avoidance, fragmentation, loss of nesting and foraging habitat, disturbance, cumulative pressure and possible reduction in breeding productivity.

In my submission, the applicant has not demonstrated, to the standard required, that the proposed development will not have an unacceptable effect on hen harrier.

5. Bats: the applicant's own bat report undermines the application

The bat evidence is also a major weakness.

The applicant's Bat Assessment records seven bat species within the survey area and describes this as a high level of bat biodiversity. It records bat activity at all or in the vicinity of all proposed turbine locations. It identifies one building within the proposed development area as a bat daytime roost for soprano pipistrelle, which is a high-risk species in relation to wind farms. It records additional bat roosts outside the proposed development area.

The same Bat Assessment identifies four High Risk turbines: T6, T7, T11 and T13. It identifies three Medium Risk turbines: T9, T10 and T12.

That means half of the proposed turbine array is identified as High or Medium Risk for bats.

In my submission, the bat assessment demonstrates that this is not an appropriate site for a turbine array of this scale. The applicant's proposed mitigation does not remove reasonable scientific doubt. It manages risk after permission. That is not enough.

6. Peatland, carbon storage and the Dough/Thur Mountains NHA

Peatland is at the heart of this objection.

Dough Mountain and its upland setting are not waste ground. They form part of a peatland, hydrological, ecological and scenic system. The nearby Dough/Thur Mountains Natural Heritage Area is designated for peatlands. The applicant's own documentation identifies peatland habitats and acknowledges the need for peat stability and surface-water mitigation.

Blanket peat is a carbon store, a habitat, a water-management system and a long-term ecological asset. It forms over thousands of years. Once damaged, it cannot simply be replaced within the lifetime of a wind farm.

The development would require turbine bases, crane hardstands, access roads, borrow pits, drainage, cabling, site compounds, turbine delivery route works and long-term maintenance infrastructure. These works involve excavation, compaction, drainage interference, concrete, imported materials, sediment risk, storage of spoil and peat, and permanent alteration of landform and water movement.

It is contradictory to damage carbon-storing peatland in the name of climate action unless the applicant can demonstrate that no unacceptable impact will arise.

The applicant may argue that the peat stability risk is low or negligible. That conclusion should be treated with caution. It is not enough for a developer to produce a peat stability assessment and assert that risk is acceptable. The Board must be satisfied that the assessment is complete, robust, conservative and capable of withstanding the precautionary principle.

Peatland wind farm cases in Ireland have repeatedly shown that the apparent engineering footprint of a project can underestimate the real environmental risk.

The applicant's own Non-Technical Summary states that Dough/Thur Mountains NHA is located upslope of the proposed wind farm site and that potential significant effects assessed for the NHA include degradation of peatland habitat associated with peat instability, drainage impacts and dust deposition. The applicant then concludes that no direct or indirect effects on peatland habitats within the NHA are predicted.

That conclusion should not be accepted without rigorous scrutiny. The fact that the applicant had to assess peat instability, drainage impacts and dust deposition on a peatland NHA confirms that this is a sensitive location.

The proposed nearest infrastructure is said to be approximately 80 metres from the NHA boundary. In the context of upland hydrology and peatland systems, 80 metres is not a meaningful comfort if drainage, groundwater movement, surface water flow, slope processes, erosion, dust and construction disturbance are not fully and definitively understood. Peatland does not respect red-line boundaries. Water does not respect red-line boundaries. Ecological systems do not respect red-line boundaries.

In my submission, this site is unsuitable for an industrial-scale wind farm of this size.

7. Hydrology, Lough Gill SAC and Lough Melvin SAC

Hydrology is one of the most serious issues in this application.

The applicant's own documents state that the proposed project is hydrologically connected to protected European sites, most notably Lough Gill SAC and Lough Melvin SAC.

8. Noise, shadow flicker and human health

Wind farm EIARs typically conclude that noise and shadow flicker can be managed by standard conditions and modelling. However, the Board should not treat those issues as purely technical.

The size of these turbines, their elevated location, the rural quietness of the receiving environment and the scale of the proposed development all matter.

The issue is not simply whether the development can be made to comply with a numerical noise standard. The issue is whether the development would fundamentally alter the lived experience of nearby residents and users of the area.

The Board should consider:

1. existing low background noise levels;
2. night-time disturbance;
3. amplitude modulation;
4. cumulative turbine noise;

5. low-frequency concerns;
6. visual dominance;
7. shadow flicker;
8. anxiety and stress caused by perceived loss of control over one's home environment;
9. construction disturbance; and
10. the overall effect on rural residential amenity.

A person living near a development of this scale does not experience these impacts separately. They experience them together.

The pathway of negative health effects of wind turbines is not clear, but a relation is suspected. ('Health effects of wind turbines on humans in residential settings: Results of a scoping review', A. Freiberg et al, Environmental Research, Volume 169, Feb. 2019, pages 446-463)

9. Renewable electricity is already being wasted

Ireland is already failing to make full use of the renewable electricity it produces. EirGrid and SONI's Annual Renewable Energy Constraint and Curtailment Report 2024 records that 2,181 GWh of all-island wind energy was dispatched down in 2024. That represented 14% of the total available wind energy. In the Republic of Ireland alone, 1,266 GWh of wind energy was dispatched down, equivalent to 10.1% of available wind energy. In the North West this percentage was even higher.

Building a new wind farm in the North West is therefore not necessary adding green electricity to the grid. It will however increase the amount of wind energy dispatched down.

In that context, companies such as FuturEnergy Ireland should be incentivised, and where appropriate required, to invest in grid reinforcement, battery storage, long-duration storage, pumped hydro, thermal storage, local demand flexibility, smart charging, community energy systems and better use of surplus renewable electricity.

The Board should ask a simple question: why should sensitive upland peatland be industrialised while significant quantities of existing renewable energy are already being curtailed or constrained?

The national energy system is strained. The grid is constrained. Storage is underdeveloped. Demand flexibility is inadequate. Rooftop solar is underused. Ports are underdeveloped for offshore wind. Retrofitting remains too slow.

Those are the problems Ireland should solve before sacrificing Dough Mountain.

10. The application process and community involvement

Despite the applicant's very extensive documentation, I have my doubts regarding the execution of the surveys. For example, when a very extensive area (in terms of both geographical size and diversity) is surveyed in just one day, I have doubts about the execution. Consequently, several surveys were conducted to a very limited extent or merely as 'desk survey'. For such industrial-scale development, I would expect higher quality surveys.

The same goes for community involvement/communication.

Since I live in Lissinagroagh, I have occasionally received post (hand delivered) containing a 'slick' letter or brochure. The information was always positive and meaningless. The only information meeting was announced only shortly beforehand, was held in the most remote village hall, took place during the day (when most people have to work), and was by appointment only.

The most important information I received at this meeting is: the size of the project and the choice of location are not based on climate goals, nature conservation, promoting biodiversity, or the safety of local residents, but purely and solely on maximizing profit for Future Energy.

Like most people in Leitrim, I support the development of renewable energy. In the Manorhamilton area wind turbines have been part of the landscape for a long time. We are no NIMBYs. However, we want to stimulate other forms of renewable energy (solar) as well. And, even more importantly, we want to be able to use 100% of the renewable energy. So, we need an upgrade of the national grid.

Instead of an industrial scale windfarm, we would like small, community based projects. Solar panels on community halls or parking lots. Let the whole community profit from these projects.

11. Conclusion

The applicant has not demonstrated, to the standard required, that this industrial-scale wind farm can be constructed and operated on this peatland, hydrologically connected, ecologically sensitive upland site without unacceptable risk to protected habitats, protected species, water quality, hydrology, European sites, landscape, residential amenity, tourism and the long-term sustainable development of North Leitrim.

For all of the above reasons, I respectfully request that permission be refused.

Yours faithfully,

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