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Co Leitrim
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An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1

6th July 2026

Re: Case reference: PAX12.324290 10 year planning permission for
Lissinagroagh Wind Farm consisting of 14 no. wind turbines and all
associated infrastructure

Dear Sir / Madam,

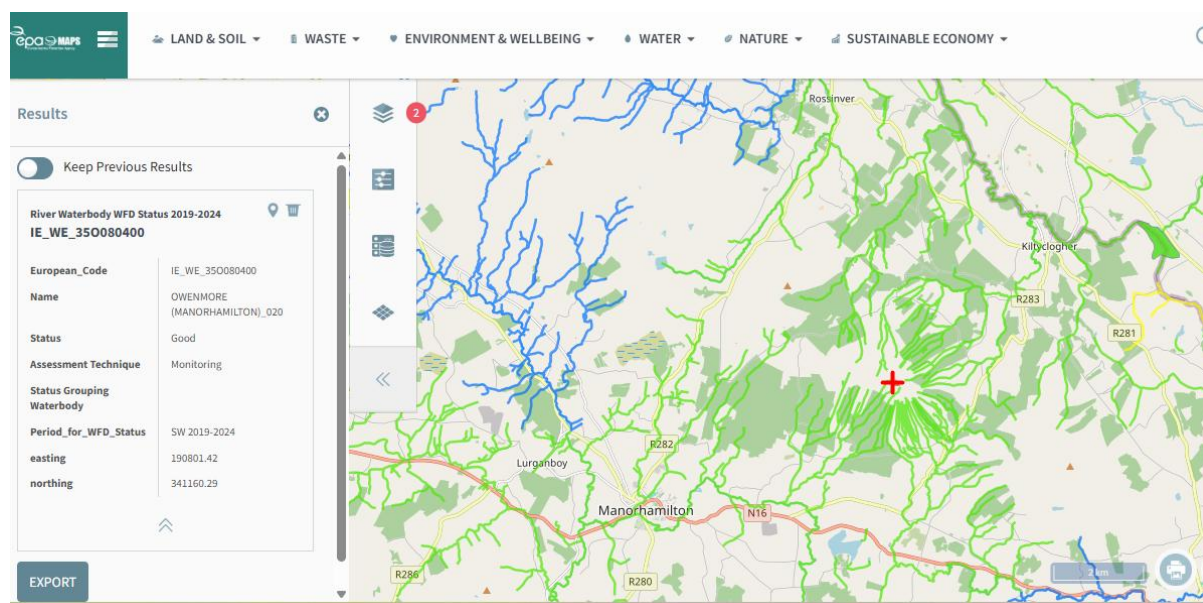
I wish to make the following observation on the above case.

I urge An Coimisiún Pleanála not to grant planning permission for this proposed
development.

I am not opposed to wind farms in the right setting but I am concerned that this site is
not suitable for the proposed development. The site and surrounding area is an area
of exceptional natural beauty and I have serious concerns regarding the impact on
tourism, visual amenity and ecology among other matters but wish to focus mainly
on water quality and the aquatic environmental impact of this proposed development
in this observation.

The site is located in two very sensitive water catchment areas. These are the Lough
Gill SAC and The Lough Melvin SAC. The head waters of the Owenmore River are
located on the south side of the site (T13 and T14) as well as the west side of the
site (T8, T9, T10, T11, and T12). These small upland streams flow into the
Owenmore River, a tributary of The Bonet River which flows into Lough Gill. On the
northern part of the site (T1, T2, T3, T4, T5, T6, and T7) the site drains to The
Lattone River, a tributary of The County River which flows into Lough Melvin. The
risk to these important SAC areas posed by the construction phase of the proposed
development is unacceptable. The headwaters of the main streams in the area
require the highest protection. Under the Water Framework Directive there is an
onus on the local authorities to maintain the high water quality status of these
streams. Therefore, this proposed development should be refused planning
permission.

Figure 1 below is an extract from The EPA Water Quality Status Maps and shows the good water status of the Owenmore River headwater streams within the proposed site.



The applicant documents state that the majority of the northern portion of the site is mapped as blanket peat, with the southern section of the site dominated by till derived from sandstone and shales. They claim that site investigations undertaken within the proposed wind farm site indicate that peat depths vary from 0.1 m to 4.5 m in the north and 0.1 m to 1.8 m in the south, with an average depth of 0.87 m over the entire site, (Volume 1 Non-Technical Summary).

In the event of heavy rain or a storm event (which are more frequent due to global climate change) during any part of the construction phase at this site (18 months for civil ground works) the possibility of a landslide is very high. The impact of a landslide in these upland bog areas would be detrimental to the area. I have witnessed the impact of such a landslide while working as a Scientific Officer with Leitrim County Council on 23rd September 2008 where 6000 fish, mainly trout were lost when tonnes of peat swept into the Owengar River during the construction phase of a windfarm at Garvagh Glebe on a nearby mountain range in North Co Leitrim. It had a detrimental impact on the streams and rivers in its path. see reference to subsequent court case published in The Irish Times dated Feb 11th 2010: *“Judge Kevin Kilrane was told that 6,000 fish, mainly trout, were lost when tonnes of peat swept through the Owengar river in Co Leitrim after a turbine-building project went wrong on September 23rd, 2008. He was told at Manorhamilton District Court it would take a minimum of €500,000 over five years to restore the river leading into Lough Allen near Drumkeeran. Garvagh Glebe Power, a consortium of the ESB and Coillte, which was building 13 huge turbines on*

Corrie mountain, pleaded guilty to two charges of pollution – permitting deleterious matter into the water.”

If a similar landslide were to occur during construction phase of the proposed development there would be a detrimental impact on the water quality, and aquatic species in the streams and rivers in these 2 major catchments. I wish to express further concern regarding the impact on water quality in Lough Gill as an SAC and a source of water abstraction for human consumption for 2 major Drinking Water Supplies, namely The North Leitrim Regional Water Supply Scheme and The Sligo and Environs Water Supply Scheme. Furthermore, I wish to express concern for the potential impact on the nearby Lough Melvin SAC which is also a source of drinking water supply for South Donegal namely Bundoran and Environs. Remedial works proposed is not the solution as the damage would be done.

I am of the opinion that no mitigation measures can cope with the force of nature of a landslide if it were to occur at the proposed site and the likelihood of such an event occurring poses too high a risk in this sensitive catchment which requires the utmost protection in accordance with the Water Framework Directive. I therefore conclude the proposed development is not appropriate on this upland bog site.

Yours Sincerely

Eileen Gibbons
MSc Env Science