

Submission to An Coimisiún Pleanála

**Objection to the Proposed Wind Farm Development at Lissinagroagh (Dough Mountain),
County Leitrim**

Your Ref: PA12.324290

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I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed wind farm development at Lissinagroagh (Dough Mountain), County Leitrim.

I fully support Ireland's transition to renewable energy and recognise the urgent need to reduce greenhouse gas emissions. However, renewable energy projects must be located in places where they do not cause irreversible damage to our natural environment, biodiversity, rural communities and quality of life. In my observation on the Dough Mountain proposal I suggest it is entirely the wrong location for an industrial-scale wind farm of this magnitude. Not this development on this site.

The proposed development comprises fourteen turbines with an overall blade-tip height of approximately 185 metres, together with extensive access roads, crane hardstands, turbine foundations, borrow pits, drainage infrastructure, cabling and associated works. This represents a permanent industrialisation of one of North Leitrim's most sensitive upland landscapes which happens to be a carbon sink. Please consider the gas emissions it will take to put such a development on the mountain, the level of emission from disturbing the bog against the output from the turbines in a suggested 35 year life span. The development makes no sense. To me the only beneficiary seems to be the applicant Future Energy.

My objection is based on the following grounds.

1. Adverse Impact on the Landscape, Peatland and Risk of Landslide

Dough Mountain is one of the defining landscape features of North Leitrim. It is an unspoilt upland landscape whose value lies not simply in its appearance but in its ecological function, peatland system, recreational value and contribution to the character of the wider area.

The proposed turbines would dominate the skyline for many kilometres. At approximately 185 metres high, each turbine would be comparable in height to a forty-five storey building. They would permanently alter the visual character of the mountain and transform a natural landscape into an industrial energy complex.

Equally concerning is the nature of the site itself. Dough Mountain consists largely of blanket bog resting on steep slopes. Blanket bog is a living ecosystem that has developed over thousands of years. It stores enormous quantities of carbon, regulates water flow and supports internationally important habitats.

The mountain already shows evidence of peat fissuring in places. The construction of turbine foundations, access roads and crane hardstands will inevitably disturb the existing peat structure. Excavation, drainage and heavy construction traffic have the potential to alter groundwater movement and reduce peat stability.

Ireland has experienced several serious peat failures associated with upland developments. While the applicant has produced a peat stability assessment, such assessments cannot eliminate uncertainty. The consequences of a peat slide would be catastrophic, potentially affecting rivers, farmland, forestry, homes and public infrastructure downstream.

The precautionary principle requires that where serious environmental damage cannot be excluded with certainty, permission should not be granted.

The landscape impact extends beyond visual appearance. Dough Mountain contributes significantly to tourism, outdoor recreation, walking, cycling and the wider identity of North Leitrim. Visitors are attracted by the area's tranquillity, dark skies and unspoilt scenery. Once industrialised, these qualities cannot be restored. On a personal note, my hillwalking club walk there regularly particularly when the sand martins arrive in Spring. We plan a festival for Easter Sunday 2027 going up Dough.

2. Adverse Impact on Biodiversity, Wildlife and the Destruction of an Important Carbon Sink

The applicant's own Environmental Impact Assessment identifies significant ecological constraints across the site.

The development area supports blanket bog habitats, protected bat species, hen harrier, marsh fritillary butterfly, otter and numerous watercourses which are hydrologically connected to protected European sites.

Of particular concern is the acknowledged displacement of breeding hen harrier. Rather than avoiding this impact, the proposal relies upon habitat enhancement, compensation lands, long-term management plans and monitoring. Such measures do not eliminate the impact; they merely attempt to compensate for it after it occurs.

Similarly, the applicant identifies seven bat species within the site and classifies several turbines as high-risk locations for bats. Operational curtailment, acoustic monitoring and adaptive management cannot provide certainty that bat mortality will be avoided over the thirty-five-year life of the project.

The proposal also relies upon potential translocation of marsh fritillary habitat should larval webs be discovered during construction. This illustrates that uncertainty remains regarding the effect on protected species.

Blanket bog itself deserves protection. It is one of Ireland's most valuable carbon sinks, storing carbon accumulated over thousands of years. Disturbance of peat through excavation, drainage and construction releases stored carbon back into the atmosphere and undermines the very climate objectives which the project seeks to promote.

It is difficult to reconcile the destruction of an ancient carbon store in the name of climate action.

The Board should also consider the cumulative impact of habitat fragmentation, altered drainage patterns, increased human activity and permanent infrastructure on the ecological integrity of this upland landscape.

3. Contravention of the Leitrim County Development Plan

The proposal conflicts with the objectives of the Leitrim County Development Plan in several important respects.

The Development Plan seeks to protect sensitive landscapes, conserve biodiversity, safeguard peatlands, protect water quality and promote sustainable tourism. It also seeks to balance renewable energy development with environmental protection and the proper planning and sustainable development of the county.

This proposal does not achieve that balance.

The industrialisation of Dough Mountain is inconsistent with the protection of landscape character which forms one of Leitrim's greatest assets. The county increasingly promotes itself as a destination for outdoor recreation, nature tourism, remote working and quality rural living. The permanent visual impact of fourteen mega-turbines would undermine those objectives.

The proposal also conflicts with policies relating to peatland protection and biodiversity conservation. The reliance upon future mitigation, compensation and adaptive management demonstrates that the ecological impacts have not been designed out of the project.

The County Development Plan recognises the importance of protecting natural heritage for future generations. Once blanket bog is disturbed and upland landscapes are industrialised, they cannot realistically be restored to their former condition.

Renewable energy must be delivered in a manner consistent with sustainable development. This proposal fails to satisfy that test.

4. Impact on Human Health and Residential Amenity

The impact of this development extends beyond ecology and landscape. It also raises legitimate concerns regarding human health and residential amenity.

Residents living close to the proposed turbines, of whom I am one, would experience continuous visual movement, rotating blades, aviation lighting, shadow flicker and increased industrial activity.

Shadow flicker is capable of causing considerable nuisance where sunlight passes through rotating turbine blades. Even where technical guidance is met, repeated flickering can interfere with normal enjoyment of homes, gardens and outdoor spaces.

The introduction of aviation warning lights would permanently alter the dark skies currently enjoyed throughout the area. The visual impact of flashing lights at night should not be underestimated in a rural landscape where darkness is an important environmental asset.

The cumulative effects of turbine movement, noise, shadow flicker and visual dominance may contribute to stress, anxiety and reduced quality of life for nearby residents.

While scientific evidence regarding certain health effects continues to evolve, planning decisions should not ignore the experiences reported by communities living close to very large wind developments elsewhere.

The purpose of the planning system is not merely to ensure compliance with numerical standards but to protect the overall quality of life of existing communities.

5. Lack of Scientific Evidence Regarding Mega Turbines, Infrasound, Neurodivergent People and Telecommunications

The turbines proposed for Dough Mountain are substantially larger than many wind turbines previously constructed in Ireland. Consequently, there is relatively limited long-term evidence regarding the environmental and human impacts of turbines approaching 185 metres in height.

Questions continue to be raised internationally regarding low-frequency noise, infrasound and their potential effects on nearby residents. While scientific opinion remains divided, it cannot be said that the absence of definitive evidence is equivalent to proof of safety.

The precautionary principle is particularly important where scientific uncertainty remains.

Consideration should also be given to people who are neurodivergent or have heightened sensory sensitivities. Individuals with autism spectrum conditions, ADHD or sensory processing disorders may experience repetitive movement, flickering light, noise and visual stimulation differently from the wider population. Although research in this area is still developing, these potential impacts should be carefully considered rather than dismissed because evidence is incomplete.

Another matter of practical concern is telecommunications.

My home relies upon a Net1 wireless broadband service, the signal for which is transmitted from Dough Mountain. The proposed turbines would be located directly between my property and the transmission source. Given the scale of the turbines and the rotating blades, there is a legitimate concern that the development will interfere with, degrade or negate the reliability of this essential service.

Reliable broadband is no longer a luxury. It is essential for communication, employment, education, access to public services and emergency contact. The planning documentation does not appear to provide a comprehensive assessment of the potential impact on existing wireless broadband services or identify how disruption would be prevented or remedied.

Where uncertainty exists regarding the effects of such a development, the burden should rest upon the applicant to demonstrate that these impacts can be excluded beyond reasonable doubt.

Conclusion

Renewable energy is essential to Ireland's future, but it must not come at the expense of landscapes, peatlands, biodiversity and rural communities that are equally important to future generations.

The proposed development would permanently industrialise Dough Mountain, threaten an important blanket bog ecosystem, place protected wildlife at risk, conflict with the objectives of the Leitrim County Development Plan and significantly affect the landscape, amenity and wellbeing of local residents.

The applicant has not demonstrated that these impacts can be avoided with the level of certainty required by Irish and European environmental law. Instead, the proposal relies heavily on mitigation, monitoring, compensation and adaptive management after permission has been granted.

In my submission, this is insufficient.

For all of the reasons outlined above, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed wind farm development in its entirety.