OBSERVATION / OBJECTION SUBMISSION

To:

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Planning Reference: PAX12.324290

Applicant: FuturEnergy Ireland

Development: Proposed Lissinagroagh Wind Farm, County Leitrim

Date: 9 July 2026

Submitted by

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Re: Observation / Objection to Planning Reference PAX12.324290 – Proposed Lissinagroagh Wind Farm

Executive Summary

I respectfully submit this observation in opposition to the proposed Lissinagroagh Wind Farm, not because I oppose renewable energy, but because I believe this particular proposal has not demonstrated, to the standard required for a Strategic Infrastructure Development, that it can proceed without causing unacceptable impacts on nearby communities and the surrounding environment.

Ireland must continue its transition towards renewable energy in order to meet national and European climate obligations. However, renewable energy developments must also satisfy the principles of proper planning and sustainable development by protecting human health, water quality, biodiversity, landscape character and existing rural communities.

The proposed development comprises fourteen industrial-scale wind turbines approaching 185 metres in height together with extensive access roads, crane hardstands, turbine foundations, cable routes, drainage infrastructure and associated engineering works within a sensitive upland peatland landscape on the Leitrim–Fermanagh border.

Having carefully reviewed the planning documentation, including the Environmental Impact Assessment Report (EIAR), I remain concerned that significant uncertainty exists regarding:

- Operational noise and its potential effects on nearby residents.
- Human health and residential amenity.
- Protection of water quality and headwater catchments.
- Peat stability and the potential consequences of extensive excavation within upland blanket bog.
- Landscape and visual impacts.
- Biodiversity and protected habitats.
- Cumulative environmental effects.
- Cross-border impacts on neighbouring communities within County Fermanagh.

- Compliance with the precautionary principle and internationally recognised public health guidance.

While mitigation measures are proposed throughout the application, I respectfully submit that the cumulative environmental impacts have not been demonstrated to be acceptable with the level of certainty required for a project of this scale and sensitivity.

For these reasons, I respectfully request that An Coimisiún Pleanála refuse planning permission.

Personal Statement

Before setting out my observations, I wish to explain the background from which this submission has been prepared.

I make this submission in my personal capacity as a local resident of North Leitrim, a part-time sheep farmer and someone with more than twenty years' professional experience working within Irish agriculture and environmental stewardship.

I have served as Vice President of the Fertiliser Association of Ireland and currently work as a Technical Sales Manager with one of Ireland's leading Irish fertiliser manufacturers.

Throughout my career I have worked with farmers, researchers, environmental specialists, government agencies and industry stakeholders to promote the responsible, efficient and sustainable use of plant nutrients in accordance with Irish and European environmental policy.

My professional responsibilities include promoting:

- sustainable nutrient management;
- improved water quality;
- reduced greenhouse gas emissions;
- increased nutrient use efficiency;
- protection of air quality;

- evidence-based environmental decision-making.

Both my employer and the Fertiliser Association of Ireland have consistently promoted best environmental practice and encouraged farmers to adopt measures that improve environmental performance while maintaining sustainable food production.

Consequently, I wish to make one matter absolutely clear.

I fully support renewable energy.

I recognise the essential contribution that wind energy will make towards achieving Ireland's climate and energy objectives.

My objection is not to renewable energy.

My objection is to the proposed location, scale and environmental assessment of this particular development.

As someone whose professional career has been dedicated to encouraging environmentally responsible practices, I believe that renewable energy developments should be held to exactly the same high environmental standards expected of every other sector.

The principles of sustainable development require that climate action, environmental protection and community wellbeing progress together.

One objective should never be achieved at the unnecessary expense of another.

This submission has therefore been prepared following careful consideration of the planning application, the Environmental Impact Assessment Report and the wider environmental implications of the proposed development.

The views expressed are entirely my own.

Introduction

I respectfully object to Planning Reference PAX12.324290 for the following principal reasons:

1. The operational noise assessment relies upon methodologies that, in my respectful opinion, require particularly careful scrutiny when applied to turbines of the scale proposed.

2. The proposal has the potential to significantly affect the exceptionally quiet rural environment currently enjoyed by nearby residents.

3. The development introduces substantial engineering works into a sensitive upland peatland environment with associated risks to water quality, peat stability and downstream aquatic ecosystems.

4. The proposed turbines would fundamentally alter the landscape character of North Leitrim and neighbouring County Fermanagh.

5. Significant uncertainty remains regarding cumulative impacts upon biodiversity, protected habitats and ecological connectivity.

6. The proposal would have long-term impacts upon residential amenity, rural communities and the quality of life of existing residents.

7. In my respectful opinion, the cumulative impacts of the development have not been demonstrated to satisfy the principles of proper planning and sustainable development.

1. NOISE, HUMAN HEALTH AND RESIDENTIAL AMENITY

1.1 Introduction

The applicant's Environmental Impact Assessment Report (EIAR), Chapter 9 – Noise and Vibration, concludes that operational noise from the proposed development can be accommodated within the limits contained in the Wind Energy Development Guidelines for Planning Authorities (2006) and the ETSU-R-97 assessment methodology.

While these documents remain part of the current Irish planning framework, they were developed before the introduction of modern wind turbines approaching 185 metres in height with rotor diameters of up to 163 metres. The scale of the proposed turbines therefore warrants particularly careful scrutiny to ensure that the assessment adequately reflects the acoustic characteristics of modern wind energy developments.

I respectfully submit that the Board should critically examine whether the applicant has demonstrated, with sufficient certainty, that operational noise from the proposed development will not result in unacceptable impacts upon nearby residents or residential amenity.

1.2 Reliance on Older Assessment Methodologies

The operational noise assessment relies principally upon the 2006 Wind Energy Development Guidelines and ETSU-R-97.

Although these documents continue to inform planning decisions in Ireland, they pre-date significant advances in turbine design, increased rotor diameters and a growing body of international research concerning wind turbine acoustics.

Modern turbines are considerably larger than those generally envisaged when ETSU-R-97 was developed.

Accordingly, compliance with ETSU-R-97 should not automatically be regarded as conclusive evidence that residential amenity will be protected in every case.

The Board should satisfy itself that the methodology remains appropriate for turbines of the scale proposed at Lissinagroagh.

1.3 World Health Organization Environmental Noise Guidelines

I respectfully ask the Board to give careful consideration to the World Health Organization Environmental Noise Guidelines for the European Region, which represent internationally recognised scientific guidance on the relationship between environmental noise and public health.

I acknowledge that these guidelines are not directly incorporated into the current Irish wind energy planning framework and that they use different acoustic indicators from those adopted within ETSU-R-97.

Nevertheless, they provide an important reference point regarding the protection of communities from long-term environmental noise exposure.

In my respectful submission, internationally recognised public health guidance should be afforded significant weight when assessing developments that have the potential to affect nearby residents over many decades.

1.4 Character of Wind Turbine Noise

Wind turbine noise differs from many other industrial noise sources.

Residents may experience:

- aerodynamic blade swish;
- periodic amplitude modulation;
- low-frequency sound;
- tonal characteristics under certain operating conditions;
- continuous operation throughout evening and night-time periods.

Average sound level calculations do not necessarily reflect the character of the noise experienced by residents.

Consequently, compliance with numerical guideline values alone may not fully represent the effect upon residential amenity.

1.5 Existing Rural Sound Environment

The receiving environment surrounding Lissinagroagh is characterised by exceptionally low background noise levels, particularly during evening and night-time periods.

This quiet acoustic environment forms an important part of the area's rural character and contributes significantly to the wellbeing and quality of life enjoyed by local residents.

The introduction of fourteen industrial-scale turbines has the potential to fundamentally alter this existing acoustic environment.

Accordingly, the Board should consider not only predicted sound pressure levels but also the contrast between the existing rural soundscape and the proposed operational environment.

1.6 Complex Topography

The proposed development occupies elevated upland terrain surrounding Dough Mountain.

The surrounding valleys, changing elevations and varying meteorological conditions may influence the way sound propagates through the landscape.

While recognised acoustic prediction models are widely used, all models rely upon assumptions.

Given the complexity of the local terrain, I respectfully submit that the Board should carefully consider whether the applicant's modelling adequately represents actual operating conditions likely to be experienced by nearby residents.

1.7 Night-Time Impacts

Night-time represents the period during which communities are most sensitive to environmental noise.

Sleep disturbance has the potential to affect:

- physical health;
- mental wellbeing;
- quality of life;
- overall residential amenity.

Given the continuous nature of wind turbine operation, I respectfully submit that particular attention should be given to predicted night-time operational noise and the potential cumulative effect over the operational life of the development.

1.8 Amplitude Modulation

International experience has demonstrated that amplitude modulation can, under certain meteorological conditions, increase the perceived annoyance associated with wind turbine noise.

Although amplitude modulation may not occur continuously, its intermittent nature may make it particularly noticeable to nearby residents.

I respectfully request that the Board carefully consider whether the applicant's assessment adequately addresses this issue and whether appropriate monitoring and management measures have been proposed.

1.9 Cumulative Noise Effects

The Environmental Impact Assessment should also be considered in the context of cumulative operational noise arising from existing, permitted or proposed wind energy developments within the wider region.

While each development may individually comply with applicable guidance, the cumulative effect upon surrounding communities may be materially different.

Accordingly, cumulative impacts should be afforded significant consideration.

1.10 Residential Amenity

The Planning and Development Act requires that development protects residential amenity as part of proper planning and sustainable development.

Accordingly, the issue before the Board is not solely whether predicted sound levels comply with existing guidance.

The Board must also consider:

- the exceptional tranquillity of the receiving environment;

- the scale of the proposed turbines;
- the continuous operational nature of the development;
- cumulative environmental impacts;
- the long-term quality of life of nearby residents.

These factors should be assessed collectively rather than in isolation.

1.11 Future Legal Disputes

I respectfully submit that the Board should also have regard to the wider implications of granting planning permission where there remains significant disagreement regarding the adequacy of operational noise assessment.

Irish courts have confirmed that the grant of planning permission does not, in itself, prevent neighbouring residents from pursuing legal remedies where excessive operational noise is alleged to constitute a private nuisance.

Accordingly, if permission is granted while significant uncertainty remains regarding the protection of nearby residents, there is potential for future disputes between residents and the operator.

A planning decision that provides confidence for residents, developers and regulators alike is in the interests of all parties.

1.12 Conclusion

Having regard to the scale of the proposed turbines, the sensitivity of the receiving environment and the continuing evolution of international scientific understanding regarding wind turbine acoustics, I respectfully submit that the applicant has not demonstrated with sufficient certainty that significant adverse effects upon residential amenity can be avoided.

I therefore respectfully request that An Coimisiún Pleanála give very careful consideration to the adequacy of the operational noise assessment contained within the EIAR before determining this application.

2. WATER QUALITY, HYDROLOGY, PEAT STABILITY AND THE DAWN OF HOPE LANDSLIDE

2.1 Introduction

The proposed Lissinagroagh Wind Farm is located within an upland landscape characterised by blanket peat, headwater streams, natural drainage systems and environmentally sensitive catchments. The development includes substantial engineering works comprising turbine foundations, crane hardstands, access roads, cable trenches, drainage infrastructure, borrow pit excavation and associated earthworks.

The applicant has assessed these matters within Chapter 7 (Land, Soils and Geology) and Chapter 8 (Hydrology and Hydrogeology) of the Environmental Impact Assessment Report (EIAR). While mitigation measures have been proposed, I respectfully submit that the Board should critically examine whether the applicant has demonstrated, to the required standard, that unacceptable impacts on water quality, peat stability and downstream aquatic ecosystems can be avoided.

Given the sensitivity of the receiving environment, the precautionary principle should be applied wherever scientific uncertainty remains.

2.2 Protection of Water Quality

The uplands surrounding Lissinagroagh form the source of numerous streams and watercourses that contribute to downstream river systems and aquatic habitats.

Construction activities of this scale inevitably introduce risks including:

- mobilisation of sediment;
- increased suspended solids in watercourses;
- peat erosion;
- accidental release of fuels, oils and hydraulic fluids;
- concrete washout contamination;
- increased surface water runoff;
- alteration of natural drainage pathways.

Although the applicant proposes mitigation measures, these systems are dependent upon proper design, implementation, maintenance and favourable weather conditions.

Extreme rainfall events, unforeseen ground conditions or construction failures could reduce the effectiveness of mitigation measures.

Accordingly, the Board should be satisfied that the proposed drainage strategy provides sufficient confidence that deterioration in water quality can be prevented throughout construction, operation and decommissioning.

2.3 Water Framework Directive

The objectives of the EU Water Framework Directive (2000/60/EC) require public authorities to prevent deterioration in the ecological status of rivers, streams and groundwater while protecting and improving aquatic ecosystems.

These obligations are fundamental to environmental decision-making.

In my respectful submission, the applicant should clearly demonstrate that the proposed development will not:

- reduce ecological status;
- adversely affect groundwater quality;
- increase sediment transport;
- alter natural hydrological connectivity;
- negatively impact downstream fisheries or aquatic habitats;
- compromise existing environmental objectives for the receiving catchments.

Where uncertainty remains, the Board should adopt a cautious approach.

2.4 Blanket Peat and Hydrology

Blanket peat represents one of Ireland's most environmentally valuable natural resources.

It performs numerous ecological functions including:

- long-term carbon storage;
- regulation of natural drainage;
- filtration of water entering downstream catchments;
- flood attenuation;
- provision of habitat for specialised plant and animal communities.

Large-scale excavation and drainage inevitably alter existing peatland hydrology.

Even relatively minor changes in groundwater movement or drainage patterns may have long-term consequences for peat stability and ecological functioning.

Accordingly, the applicant should demonstrate that excavation and drainage proposals will not adversely affect the long-term integrity of peatland systems.

2.5 Climate Change and Increased Rainfall

Climate projections for Ireland indicate an increasing frequency of intense rainfall events.

These changing climatic conditions have the potential to increase:

- runoff rates;
- erosion;
- pressure on drainage systems;
- sediment transport;
- peat instability.

The Board should therefore be satisfied that engineering designs are sufficiently resilient to future climatic conditions and not solely historical weather patterns.

2.6 The Dawn of Hope Peat Landslide

North Leitrim experienced a significant peat landslide in the vicinity of the Dawn of Hope Bridge in 2020.

This event demonstrated that extensive peat failures are capable of occurring within the wider regional landscape under certain geological and meteorological conditions.

I do not suggest that the Dawn of Hope event proves that a similar failure will occur at Lissinagroagh. Every site possesses its own geological and hydrological characteristics.

However, the event provides an important reminder that blanket peat systems within County Leitrim can be vulnerable to instability.

Accordingly, I respectfully request that the Board critically examine:

- the applicant's peat stability assessment;
- geotechnical investigations;

- slope stability analysis;
- drainage proposals;
- groundwater modelling;
- excavation methodology;
- emergency response procedures.

The existence of a significant regional peat failure reinforces the need for a cautious and evidence-based approach when assessing large-scale engineering works on upland peatlands.

2.7 Construction Risk

Construction projects of this scale remain susceptible to:

- exceptional rainfall;
- equipment failure;
- unforeseen geological conditions;
- human error.

Although mitigation measures such as settlement ponds, silt fencing and drainage controls are proposed, they cannot completely eliminate risk.

The Board should therefore consider whether the residual environmental risks are acceptable having regard to the sensitivity of the receiving environment.

2.8 Fisheries and Aquatic Ecology

Downstream watercourses support aquatic ecosystems that may be particularly sensitive to increases in suspended solids or changes in water quality.

Even temporary deterioration during construction has the potential to affect:

- fish spawning habitat;
- aquatic invertebrates;
- riparian vegetation;
- ecological connectivity.

Protection of these resources should remain a central consideration throughout the planning process.

2.9 Long-Term Environmental Monitoring

Should the Board ultimately determine that permission ought to be granted, comprehensive environmental monitoring should continue throughout construction and operation.

Monitoring should include:

- surface water quality;
- groundwater quality;
- peat movement;
- drainage performance;
- sediment control;
- ecological restoration.

Independent environmental auditing would also improve public confidence and transparency.

2.10 Conclusion

Having regard to the scale of excavation proposed, the presence of blanket peat, the sensitivity of the receiving catchments, the obligations arising under the Water

Framework Directive and the regional experience of peat instability demonstrated by the Dawn of Hope landslide, I respectfully submit that the applicant has not demonstrated with sufficient certainty that unacceptable impacts upon water quality and peat stability can be avoided.

The precautionary principle should therefore weigh heavily in the Board's consideration of this application.

For these reasons, I respectfully submit that the potential impacts upon water quality, hydrology and peat stability represent significant material planning considerations weighing against the granting of planning permission.

3. LANDSCAPE, VISUAL IMPACT, TOURISM AND RURAL CHARACTER

3.1 Introduction

The proposed Lissinagroagh Wind Farm would introduce fourteen industrial-scale wind turbines, each with an overall tip height of approximately 185 metres, into one of the most distinctive upland landscapes in County Leitrim.

The applicant has assessed the likely impacts within Chapter 13 (Landscape and Visual Impact Assessment) of the Environmental Impact Assessment Report (EIAR). While that assessment concludes that the landscape can accommodate the proposed development, I respectfully submit that the true scale, prominence and cumulative effect of the proposal have not been fully appreciated.

Unlike many forms of development, wind turbines are highly visible structures that remain a dominant feature of the landscape throughout their operational lifetime. Their effects are experienced continuously by residents, visitors and those travelling through the area.

3.2 The Character of the North Leitrim Landscape

North Leitrim is recognised for its unique upland scenery, open mountain ridges, blanket bog, native woodlands, rivers, lakes and dispersed rural settlement.

The landscape is characterised by:

- extensive areas of open countryside;
- relatively low levels of industrial development;
- panoramic views across County Leitrim and neighbouring County Fermanagh;
- a strong sense of remoteness and tranquillity;
- a landscape that supports farming, forestry, recreation and nature-based tourism.

These qualities represent an important environmental, cultural and economic resource.

The existing landscape is valued not only by those who live within it but also by visitors who are attracted by its natural character.

3.3 Scale of the Proposed Development

The proposed turbines would reach approximately 185 metres from ground level to blade tip.

To place this into perspective:

- they would extend substantially above surrounding forestry;
- they would become dominant skyline features across extensive areas;
- they would remain visible over long distances;
- they would rank amongst the tallest onshore wind turbines proposed in Ireland.

The visual effect is therefore not simply one of individual turbines but of a large-scale industrial development occupying an elevated upland landscape.

3.4 Visual Dominance

The elevated position of the turbines means that they will be visible from numerous public roads, homes, farms, recreational routes and viewpoints.

Their visual presence will be increased by:

- rotating blades;
- movement across the skyline;
- aviation warning lighting during hours of darkness;
- the cumulative effect of fourteen turbines operating simultaneously.

The Board should consider not only static visual appearance but also the continuous movement and changing visual character associated with operational turbines.

3.5 Cumulative Landscape Effects

Landscape assessment should not consider the proposed development in isolation.

The Board should also assess cumulative effects arising from:

- existing wind energy developments;
- permitted developments;
- future renewable energy proposals;
- associated electricity transmission infrastructure.

While one development may individually be considered acceptable, successive developments have the potential to fundamentally alter the overall landscape character of an entire region.

It is this cumulative process of landscape industrialisation that should be carefully examined.

3.6 Tourism and Recreation

County Leitrim has developed an increasingly strong reputation as a destination for:

- walking;
- cycling;
- angling;
- hill walking;
- nature tourism;
- outdoor recreation.

Many visitors are attracted by the county's relatively unspoilt landscape and peaceful environment.

Although the economic effects of visual change are not always easily quantified, landscape quality is itself an important component of the visitor experience.

Accordingly, the Board should consider whether the proposal is compatible with the long-term development of sustainable tourism within the region.

3.7 Residential Visual Amenity

For nearby residents, the visual effects extend beyond distant landscape views.

The proposed turbines would become a permanent component of the daily living environment.

Residents may experience:

- continuous visual dominance;
- rotating blade movement;
- aviation lighting at night;
- shadow flicker where relevant;
- altered outlook from homes and farms.

These factors should be considered collectively when assessing residential amenity.

3.8 Cross-Border Landscape

The proposed development is located close to the border with Northern Ireland.

The visual effects will therefore extend well beyond County Leitrim.

Residents and visitors within County Fermanagh will experience many of the same landscape impacts despite being outside the planning jurisdiction in which this application is being determined.

Landscape is a shared environmental resource that does not end at an administrative boundary.

The Board should therefore carefully consider whether the transboundary visual assessment fully reflects these wider impacts.

3.9 Rural Identity

North Leitrim has developed its own distinct rural identity through generations of farming, forestry and stewardship of the landscape.

The introduction of industrial-scale infrastructure into this setting has the potential to fundamentally alter that identity.

This is not merely a question of aesthetics.

It concerns the long-term character of the landscape and the relationship between communities and the environment in which they live.

3.10 Irreversible Landscape Change

Should planning permission be granted, the landscape changes associated with the proposed development would remain for several decades.

During that period, the existing skyline, visual character and sense of place would be fundamentally altered.

The Board should therefore carefully consider whether these changes are justified having regard to the environmental sensitivity of the receiving landscape.

Where uncertainty remains regarding cumulative landscape effects, the precautionary principle should favour protection of the existing environment.

3.11 Conclusion

I respectfully submit that the proposed development would introduce industrial-scale infrastructure into one of County Leitrim's most environmentally sensitive and visually distinctive upland landscapes.

The cumulative effects upon landscape character, visual amenity, tourism, rural identity and cross-border views have not, in my opinion, been demonstrated to be acceptable.

Accordingly, I respectfully request that An Coimisiún Pleanála give significant weight to these landscape considerations when determining this application and conclude that they weigh against the granting of planning permission.

4. BIODIVERSITY, ECOLOGY, NATURA 2000 SITES AND PROTECTED SPECIES

4.1 Introduction

The proposed Lissinagroagh Wind Farm is located within an environmentally sensitive upland landscape comprising blanket bog, peatland habitats, commercial forestry, headwater streams and ecological corridors supporting a wide range of flora and fauna.

The applicant has assessed these matters within Chapter 6 (Biodiversity) of the Environmental Impact Assessment Report (EIAR), together with the accompanying Natura Impact Statement (NIS).

While I acknowledge the considerable ecological work undertaken by the applicant, I respectfully submit that the Board should carefully consider whether the information provided demonstrates, beyond reasonable scientific doubt, that the proposed development will not result in significant adverse effects upon biodiversity, protected habitats or European sites.

The ecological sensitivity of the receiving environment requires a particularly cautious and evidence-based approach.

4.2 The Ecological Importance of the Area

The uplands of North Leitrim form part of an interconnected ecological landscape that supports habitats of national and international importance.

The ecological value of the area extends beyond the immediate turbine locations and includes:

- blanket bog;
- wet heath;
- upland streams;
- peatland vegetation;
- commercial forestry;
- hedgerows and ecological corridors;
- riparian habitats.

These habitats perform important ecological functions by supporting biodiversity, regulating water movement and maintaining ecological connectivity throughout the wider landscape.

Accordingly, the environmental assessment should consider both direct and indirect ecological effects.

4.3 Blanket Bog and Peatland Ecology

Blanket bog represents one of Ireland's most significant natural habitats.

In addition to its role in carbon storage and water regulation, blanket bog supports specialised plant and animal communities adapted to this unique environment.

Excavation, drainage and infrastructure development have the potential to alter:

- groundwater movement;
- peat moisture levels;
- vegetation composition;
- ecological connectivity;

- habitat condition.

Even where habitat loss is relatively limited, indirect ecological effects may occur through changes in hydrology and long-term peat behaviour.

The Board should therefore carefully consider whether these indirect impacts have been fully assessed.

4.4 Birds

The upland habitats surrounding the proposed development provide habitat and foraging opportunities for a variety of bird species associated with peatland, forestry and open countryside.

Wind energy developments have the potential to affect birds through:

- collision risk;
- habitat displacement;
- disturbance during breeding;
- fragmentation of foraging areas;
- cumulative effects with other developments.

The applicant has undertaken bird surveys; however, the Board should be satisfied that the survey effort, methodology and assessment remain sufficient to identify all significant risks throughout the operational life of the development.

Where uncertainty remains, additional caution is warranted.

4.5 Bats

Bats are protected under Irish and European legislation and are recognised as potentially vulnerable to operational wind turbines.

Potential impacts include:

- direct collision;
- barotrauma;
- disruption of commuting routes;
- habitat fragmentation.

The effectiveness of proposed mitigation measures should be carefully evaluated, particularly in relation to long-term operational monitoring and adaptive management should unforeseen impacts arise.

4.6 Mammals and Other Protected Species

The wider landscape supports a range of protected mammals and other wildlife that rely upon habitat connectivity across upland areas.

Construction activities, increased traffic and long-term operational infrastructure have the potential to influence species through:

- disturbance;
- habitat fragmentation;
- changes in movement patterns;
- alteration of drainage and vegetation.

The Board should therefore ensure that ecological surveys remain current and representative of conditions likely to exist during construction and operation.

4.7 Hydrological Connectivity

One of the principal ecological considerations associated with peatland development is hydrological connectivity.

Ecological effects should not be considered solely within the immediate construction footprint.

Changes in water movement may influence habitats located considerable distances downstream.

Accordingly, ecological assessment should fully consider:

- upstream and downstream connectivity;
- groundwater interactions;
- indirect habitat effects;
- cumulative hydrological change.

The Board should carefully review whether these pathways have been comprehensively assessed within the EIAR and Natura Impact Statement.

4.8 Natura 2000 Sites

Under Article 6 of the Habitats Directive, An Coimisiún Pleanála may only approve a project where it has ascertained that the proposal will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

This is a particularly high legal threshold.

Where reasonable scientific doubt remains regarding ecological impacts, permission should not be granted.

The applicant therefore carries the responsibility of demonstrating, through objective scientific evidence, that the integrity of protected sites will be maintained.

4.9 Cumulative Ecological Effects

Ecological impacts should also be considered cumulatively.

The Board should examine whether the applicant has adequately assessed cumulative effects arising from:

- existing wind farms;

- forestry operations;
- road infrastructure;
- electricity transmission infrastructure;
- future renewable energy developments.

Individually minor impacts may collectively become significant over time.

4.10 Ecological Monitoring

Should permission ultimately be granted, comprehensive ecological monitoring should continue throughout construction and operation.

Monitoring should include:

- habitat condition;
- water quality;
- bird activity;
- bat activity;
- peat restoration;
- invasive species management.

Independent ecological auditing would provide additional transparency and confidence regarding compliance with mitigation measures.

4.11 Conclusion

County Leitrim's upland habitats represent an important environmental resource whose ecological value extends beyond the immediate development site.

Having regard to the sensitivity of blanket bog habitats, ecological connectivity, protected species and the legal obligations arising under the Habitats Directive and Birds Directive,

I respectfully submit that the applicant has not demonstrated with sufficient certainty that unacceptable ecological impacts can be excluded.

Accordingly, I respectfully request that An Coimisiún Pleanála apply the precautionary principle where scientific uncertainty remains and give significant weight to these ecological considerations when determining this application.

5. RESIDENTIAL AMENITY, RURAL COMMUNITIES, AGRICULTURE AND TRANSBOUNDARY EFFECTS

5.1 Introduction

One of the principal objectives of the Irish planning system is to ensure that development contributes to the proper planning and sustainable development of an area while protecting the amenity and wellbeing of existing communities.

The proposed Lissinagroagh Wind Farm is not being considered in isolation from the people who live, work and farm within the receiving environment.

The Board is therefore required to assess not only the technical performance of the development but also its long-term implications for residential amenity, community wellbeing, sustainable rural development and environmental quality.

In my respectful submission, the cumulative impacts of this proposal would fundamentally alter the character of everyday life for many residents of North Leitrim and neighbouring County Fermanagh.

5.2 Residential Amenity

Residential amenity extends beyond compliance with individual environmental standards.

It includes the overall enjoyment of one's home and surrounding environment.

Residents are entitled to expect a reasonable level of protection regarding:

- environmental tranquillity;
- peaceful occupation of their homes;
- quality of surrounding landscape;
- environmental quality;
- freedom from excessive industrial disturbance.

The proposed development introduces fourteen industrial-scale wind turbines together with extensive supporting infrastructure into an area whose defining characteristics are peace, open countryside and relatively low levels of existing development.

The cumulative effect of operational noise, visual change, aviation lighting, construction traffic and long-term industrial activity has the potential to materially affect residential amenity.

5.3 Human Health and Wellbeing

Modern planning increasingly recognises that environmental quality is closely linked to public health and wellbeing.

Residents of rural communities benefit from:

- quiet surroundings;
- clean air;
- dark night skies;
- open landscapes;
- access to nature;
- opportunities for outdoor recreation.

These characteristics contribute to both physical and mental wellbeing.

Although individual environmental effects may each be assessed separately within the EIAR, I respectfully submit that the Board should consider their combined effect upon the health and quality of life of local communities.

5.4 Rural Communities

North Leitrim has developed a strong identity based upon farming, forestry, local enterprise and stewardship of the natural environment.

The area's attractiveness derives not only from its scenery but from its sense of place and community.

Large-scale infrastructure projects have the potential to alter this character over many decades.

The Board should therefore consider whether the proposal supports the long-term sustainability of rural communities as well as national renewable energy objectives.

5.5 Agriculture

Agriculture remains one of the principal land uses within the wider area.

Construction activities associated with the proposed development have the potential to affect:

- farm access;
- livestock management;
- local drainage;
- field operations;
- movement of agricultural machinery;
- local road safety.

Although mitigation measures may reduce these impacts, they should be fully considered in assessing the overall effect of the proposal upon the rural economy.

5.6 Tourism and Recreation

County Leitrim has established an important reputation for outdoor recreation and nature-based tourism.

Activities including walking, cycling, angling and hill walking depend heavily upon the county's landscape quality and environmental character.

The proposed development has the potential to alter the visual experience of visitors and recreational users over a wide geographical area.

While tourism impacts are often difficult to quantify, they remain a legitimate planning consideration where landscape quality represents an important environmental and economic asset.

5.7 Construction Impacts

The construction phase will involve a prolonged period of engineering activity, including:

- heavy goods vehicle movements;
- delivery of turbine components;
- excavation works;
- road improvements;
- concrete works;
- increased construction traffic;
- temporary construction noise and dust.

These activities will inevitably affect local residents, farmers and road users.

The cumulative burden of construction should therefore be considered alongside the long-term operational impacts of the development.

5.8 Cross-Border Effects

The proposed development is located in close proximity to the border with Northern Ireland.

Many of the environmental effects identified within this submission—including landscape change, operational noise and visual impacts—will be experienced by communities in County Fermanagh.

Environmental effects do not end at political boundaries.

The Board should therefore ensure that the transboundary implications of the proposal have been fully assessed and appropriately considered.

5.9 Environmental Justice

The principles of sustainable development require that environmental benefits and environmental burdens are distributed fairly.

Rural communities should not bear disproportionate environmental impacts simply because they are located within areas suitable for renewable energy development.

Climate action and renewable energy are essential national objectives.

However, they should be delivered in a manner that respects existing communities and protects environmental quality.

Sustainable development requires that environmental, social and economic considerations are balanced rather than prioritising one objective at the expense of another.

5.10 Long-Term Legacy

Should planning permission be granted, the proposed development will remain part of the landscape and community for several decades.

Accordingly, the Board should consider not only the immediate benefits of renewable energy generation but also the long-term legacy for:

- local residents;
- future generations;
- the rural economy;
- environmental quality;

- landscape character;
- community identity.

These are lasting consequences that extend well beyond the construction period.

5.11 Conclusion

Having regard to the cumulative environmental effects identified throughout this submission, I respectfully submit that the proposed development would have significant implications for residential amenity, community wellbeing, rural character and the long-term sustainability of North Leitrim and neighbouring communities.

These matters should not be considered individually but collectively as part of the Board's assessment of proper planning and sustainable development.

For these reasons, I respectfully submit that the impacts upon local communities weigh significantly against the granting of planning permission for the proposed Lissinagroagh Wind Farm.

6. PLANNING POLICY, ENVIRONMENTAL LAW AND STATUTORY CONSIDERATIONS

6.1 Introduction

In determining this Strategic Infrastructure Development application, An Coimisiún Pleanála must consider whether the proposed development constitutes proper planning and sustainable development, having regard to Irish planning legislation, European environmental law, national planning policy, the Environmental Impact Assessment Report (EIAR), the Natura Impact Statement (NIS), submissions received during the public consultation process and all other relevant material considerations.

The applicant bears the responsibility of demonstrating that the proposed development can proceed without causing unacceptable adverse effects upon people, biodiversity, water quality, landscape, cultural heritage and the wider environment.

Where uncertainty remains regarding significant environmental effects, I respectfully submit that the Board should exercise appropriate caution before granting consent.

6.2 Proper Planning and Sustainable Development

The Planning and Development Act 2000 (as amended) requires planning decisions to promote the proper planning and sustainable development of the area.

This requires balancing a number of important objectives, including:

- Ireland's climate and renewable energy commitments;
- protection of public health;
- residential amenity;
- biodiversity conservation;
- water quality protection;
- landscape protection;
- sustainable rural development;

- environmental stewardship.

Support for renewable energy cannot, in itself, determine the outcome of an individual planning application.

Each proposal must be assessed on its own merits and within the environmental capacity of its location.

6.3 The Environmental Impact Assessment Process

The purpose of the Environmental Impact Assessment process is not merely to describe potential impacts but to provide the Board with sufficient information to make an informed and evidence-based decision.

Accordingly, the Board should critically examine:

- the assumptions used throughout the EIAR;
- the methodologies adopted by the applicant;
- the effectiveness of proposed mitigation measures;
- residual environmental impacts following mitigation;
- cumulative impacts;
- long-term monitoring proposals.

Where significant uncertainty remains after considering the available evidence, that uncertainty should be reflected in the Board's decision.

6.4 Water Framework Directive

The EU Water Framework Directive (2000/60/EC) establishes an objective of preventing deterioration in the status of surface waters and groundwater while protecting and improving aquatic ecosystems.

The proposed development is located within sensitive upland catchments.

Accordingly, the Board should be satisfied that the proposal will not:

- reduce ecological status;
- adversely affect groundwater;
- increase sediment transport;
- alter natural drainage patterns;
- adversely affect downstream aquatic ecosystems.

These obligations remain fundamental throughout the operational life of the development.

6.5 Habitats Directive and Birds Directive

The Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC) establish a high level of protection for European sites and protected species.

Before granting consent, the Board must be satisfied that the proposal will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

This represents one of the highest legal standards within European environmental law.

Where reasonable scientific doubt remains, the precautionary principle supports a cautious approach.

6.6 The Precautionary Principle

The precautionary principle is a recognised principle of European environmental law.

It recognises that where there is uncertainty regarding the potential for serious or irreversible environmental harm, decisions should err on the side of environmental protection.

This principle is particularly relevant to:

- peat stability;
- water quality;
- hydrological connectivity;
- biodiversity;
- cumulative environmental impacts;
- long-term human health.

In my respectful opinion, the precautionary principle should guide the Board's consideration of this application.

6.7 Climate Action and Environmental Protection

I fully support Ireland's commitment to reducing greenhouse gas emissions and increasing renewable electricity generation.

However, climate action should not be interpreted as requiring approval of every renewable energy proposal regardless of location.

The long-term success of Ireland's renewable energy transition depends upon public confidence that developments are appropriately located, environmentally responsible and supported by robust scientific assessment.

Renewable energy and environmental protection should be complementary objectives rather than competing ones.

Approving development where significant uncertainty remains may undermine both public confidence and the credibility of the planning process.

6.8 Cumulative Planning Balance

Planning decisions should consider the cumulative effect of all environmental impacts rather than assessing each issue in isolation.

In the case of the proposed Lissinagroagh Wind Farm, the Board is asked to consider a development involving:

- turbines approaching 185 metres in height;
- extensive excavation within upland peatland;
- potential impacts upon water quality;
- landscape transformation;
- ecological impacts;
- residential amenity concerns;
- cross-border environmental effects;
- decades of industrial-scale infrastructure within a rural landscape.

While individual impacts may each be capable of mitigation to some extent, their cumulative effect should be considered in determining whether the proposal represents sustainable development.

6.9 Public Confidence in Environmental Decision-Making

As someone who has spent my professional career promoting evidence-based environmental protection within Irish agriculture, I believe that public confidence in environmental regulation depends upon consistency in the application of scientific evidence.

Throughout my work, farmers have been encouraged to adopt practices that exceed minimum legal requirements where research demonstrates environmental benefit.

Similarly, public authorities should continue to consider evolving scientific knowledge when assessing major infrastructure proposals.

This approach strengthens confidence in both environmental regulation and the planning process.

6.10 Conclusion

Having carefully considered the planning documentation and the issues outlined throughout this submission, I respectfully submit that the applicant has not demonstrated, to the standard required for Strategic Infrastructure Development, that the proposed development can proceed without unacceptable adverse effects upon the receiving environment.

The Board is therefore respectfully requested to conclude that the proposal does not represent proper planning and sustainable development at this location and to refuse planning permission for Planning Reference PAX12.324290.

7. PROFESSIONAL BACKGROUND, PUBLIC HEALTH AND FINAL STATEMENT

7.1 Professional Background and Commitment to Environmental Sustainability

Before concluding this submission, I wish to place on record my professional background and the perspective from which these observations have been made.

I make this submission in my personal capacity as a local resident of North Leitrim and as a part-time sheep farmer with a longstanding interest in the protection of the rural environment.

Professionally, I have served as Vice President of the Fertiliser Association of Ireland and currently work as a Technical Sales Manager with one of Ireland's leading Irish fertiliser manufacturers.

Throughout my career, I have worked closely with farmers, Teagasc advisers, researchers, environmental specialists, industry representatives and government agencies to promote the sustainable and responsible use of fertilisers throughout Ireland.

Much of my professional work centres on encouraging:

- improved water quality;
- reduced greenhouse gas emissions;
- efficient nutrient management;
- protection of biodiversity;
- protection of air quality;
- evidence-based environmental decision-making.

The Irish fertiliser industry has invested significantly in research, innovation and farmer education to reduce agriculture's environmental footprint while maintaining sustainable food production.

As an industry, we regularly encourage farmers to adopt practices that go beyond minimum legal compliance where scientific evidence demonstrates a clear environmental benefit.

For that reason, I believe that all sectors—including renewable energy—should be expected to demonstrate the same commitment to environmental protection, scientific evidence and continuous improvement.

My objection should therefore not be interpreted as opposition to renewable energy.

On the contrary, I strongly support Ireland's transition towards renewable electricity generation and recognise the essential contribution that wind energy must make in achieving our national climate commitments.

My objection relates solely to the suitability of this particular proposal, at this particular location, and whether the environmental assessment has demonstrated that the development can proceed without unacceptable impacts on local communities and the environment.

7.2 Public Health and the World Health Organization

Throughout this submission I have referred to the World Health Organization Environmental Noise Guidelines.

I acknowledge that these guidelines are not currently incorporated directly into Ireland's statutory wind energy planning framework and that Irish planning authorities must determine applications in accordance with the applicable legislative and policy framework.

Nevertheless, the WHO guidelines represent internationally recognised scientific advice developed to protect human health from the long-term effects of environmental noise.

During the COVID-19 pandemic, governments, public authorities and communities across Ireland relied heavily upon advice issued by the World Health Organization because it represented internationally respected scientific guidance intended to protect public health.

While environmental noise guidance operates within a different legal framework, I respectfully submit that internationally recognised scientific evidence should continue to carry significant weight where planning decisions may affect the health and wellbeing of communities for decades.

In my respectful opinion, public confidence in environmental regulation is strengthened when planning decisions are informed by the best available scientific knowledge, even where statutory guidance has not yet fully evolved to reflect that knowledge.

7.3 Future Disputes and Long-Term Certainty

I also respectfully ask the Board to consider the long-term consequences of its decision.

Irish courts have confirmed that the grant of planning permission does not, of itself, prevent neighbouring residents from pursuing legal remedies where operational impacts are alleged to constitute a private nuisance.

Accordingly, if planning permission is granted while significant concerns remain regarding operational noise, residential amenity or environmental effects, there remains the potential for future disputes between local residents and the wind farm operator.

Such disputes are unlikely to be in the interests of local communities, the developer, public authorities or the wider planning system.

A planning decision that is robust, evidence-based and capable of commanding public confidence provides greater certainty for all parties.

For that reason, I respectfully submit that the Board should be fully satisfied that the proposed development provides an appropriate level of protection for nearby residents before granting consent as I feel it strongly does not.

7.4 Final Request to the Board

I appreciate the considerable responsibility placed upon An Coimisiún Pleanála when determining Strategic Infrastructure Development applications.

I also recognise the importance of renewable energy in achieving Ireland's climate objectives.

However, climate action and environmental protection should not be viewed as competing priorities.

True sustainable development requires that renewable energy projects are delivered in locations where they can coexist with healthy communities, protected ecosystems and high-quality rural environments.

Having carefully considered the planning documentation and the Environmental Impact Assessment Report, I respectfully submit that the applicant has not demonstrated, with the degree of certainty required for a development of this scale, that unacceptable impacts upon residential amenity, human health, water quality, peat stability, biodiversity, landscape character and the wider receiving environment can be avoided.

For all of the reasons outlined throughout this submission, I respectfully request that An Coimisiún Pleanála refuse planning permission for Planning Reference PAX12.324290.

I make this submission in good faith as a local resident, a farmer and an environmental professional who believes that renewable energy and environmental protection must progress together.

I understand that this submission will form part of the statutory planning file and may be made available for public inspection. I am content for it to be placed on the public record as part of the Board's consideration of this application.

I thank the Board for its consideration of my observations and respectfully request acknowledgement of this submission together with notification of its final decision.

Yours faithfully,

Gavin Mc Gowan