

To: An Coimisiún Pleanála

Re: Observation on the Proposed Lissinagroagh (Dough Mountain) Wind Farm Development
Case Reference: PAX12.324290

A Chara,

Having reviewed the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Appropriate Assessment Screening Report (AASR), supporting appendices, Planning Statement, and the relevant provisions of the Leitrim County Development Plan 2023–2029, I wish to object to the proposed Lissinagroagh (Dough Mountain) Wind Farm development.

My objection is not based on opposition to renewable energy. I recognise the importance of climate action and renewable energy generation. However, renewable energy policy does not remove the requirement to demonstrate that a specific development is appropriate in a specific location.

In my view, the applicant has not demonstrated that Dough Mountain is a suitable location for a wind farm of this scale.

The proposed development comprises 14 turbines with tip heights of up to 185 metres, a 100 m meteorological mast, approximately 7.95 km of new internal access tracks, approximately 8.35 km of upgraded tracks, three borrow pits, drainage and sediment-control infrastructure, watercourse crossings, construction compounds, grid connection infrastructure and turbine delivery works, as set out in EIAR Chapter 2, Description of the Proposed Project.

Having reviewed the documentation, I am struck by the extent to which the application itself identifies environmental sensitivity, hydrological complexity, landscape sensitivity, peatland constraints, protected species issues and reliance on mitigation and compensation. Rather than reassuring me that this is a suitable site, the documentation raises the more fundamental question of whether this location should be developed at all.

Planning Policy and the Leitrim Renewable Energy Strategy

The Leitrim County Development Plan 2023–2029 supports renewable energy, but that support is expressly subject to proper planning and environmental considerations. RE POL 1 supports renewable energy “subject to compliance with proper planning and environmental considerations.” RE POL 3 requires environmental assessments for new energy developments to address reasonable alternatives for location.

The Leitrim Renewable Energy Strategy, Appendix X to the County Development Plan, is also highly relevant. It states that, having combined technical and mapping analysis with the Landscape and Visual Capacity Assessment, opportunities for new wind farms are limited and that “there are no areas where new wind turbines would be considered acceptable in principle.”

This is important because the applicant's Planning Statement relies heavily on the proposal's relationship with "Available Areas" in the Renewable Energy Strategy. However, the Strategy makes clear that such areas do not amount to "acceptable in principle" areas for wind energy. The applicant's Planning Statement acknowledges that neither the designation of land as an "Available Area" nor the absence of such designation is determinative of whether a wind energy development should be permitted. The Planning Statement states that "the operative question remains whether the proposal is acceptable on its own planning and environmental merits."

I agree with that framing. In my view, when assessed on its planning and environmental merits, this proposal fails that test.

Project Interdependence and Grid Connection

The Planning Statement submitted with the application states that the proposed wind farm and associated grid connection infrastructure are functionally interdependent and together constitute a single project. The development cannot operate without the electrical infrastructure required to export electricity from the site, including the on-site substation, underground grid connection route and connection to the national electricity network.

This is significant in light of the principle established in *Ó Grianna v An Bord Pleanála*, where the High Court held that the connection of a wind farm to the national grid forms an integral part of the overall development and that the cumulative effects of the turbines and grid connection must be assessed together for the purposes of Environmental Impact Assessment. The applicant's own description of the wind farm and grid connection as functionally interdependent reinforces the need for An Coimisiún Pleanála to assess all elements as one integrated development.

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 and includes substantial linear infrastructure crossing a range of landscapes, habitats, watercourses and ecological receptors.

The application material indicates that several underground grid connection route options were considered before a preferred route was identified. I am concerned that the Commission should be satisfied that the relevant statutory consultees were provided with sufficient detail on those later-developed route options and the preferred alignment, including watercourse crossings, sensitive habitats, fisheries interests, karst and groundwater constraints, ecological receptors, residential receptors and other relevant environmental considerations.

A broad reference at scoping stage to an underground grid connection is not necessarily equivalent to 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 properly comment on the grid connection where they have adequate information on its likely alignment 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 a secondary or merely ancillary element of the development. It forms an important part of the environmental assessment of the project as a whole.

The wider EirGrid transmission context also underlines the need for clarity. Public information issued by EirGrid in relation to its North-West reinforcement proposals indicates that transmission infrastructure in the region, including connections associated with Srananagh, is evolving through separate stages of development and consultation. I do not suggest that this removes Tobin or FuturEnergy's responsibility to assess the proposed grid connection relied upon in this application. Rather, it makes it more important that the Commission is clear about exactly what connection infrastructure is being assessed now, where the relevant project area lies, and whether the route and associated effects are sufficiently defined for proper assessment.

Given the applicant's own position that the wind farm and grid connection constitute a single, functionally interdependent development, I respectfully request that the Commission 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 and associated construction activities across the wider receiving environment.

The issue is not that the grid connection has been omitted from the application documentation. It 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. In the absence of clarity on those matters, there is a risk that the Commission is being asked to determine the wind farm before the full environmental implications of the functionally interdependent grid connection have been properly examined.

In a development of this scale and complexity, the environmental consequences of the wind farm, substation, grid connection and associated works should be considered as an integrated whole rather than as a series of separate components. The fact that the grid infrastructure extends the project footprint well beyond the immediate wind farm site reinforces the need for a comprehensive and precautionary assessment of the complete project.

Landscape, Area of High Visual Amenity and Landscape Character

The proposed development is located across the B3 Dough Mountain Area of High Visual Amenity, as recognised in EIAR Chapter 13, Landscape and Visual. The same chapter quotes the County Development Plan description of B3 Dough Mountain as *'an upland landscape with a smooth rounded mountain skyline which overlooks the valley landscape to the south presenting a recognisable skyline and conferring a sense of place on the local area. Visitors at elevated locations can enjoy panoramic views of the adjacent hills and lowlands. The mountain summit and surrounding elevated areas feature a landcover of peat bog and are generally*

remote and tranquil'. These qualities are not incidental. They are the very characteristics that led to Dough Mountain being designated as an Area of High Visual Amenity and recognised as a sensitive upland landscape within the County Development Plan.

The County Development Plan includes policies for landscape protection. LD POL 2 seeks to protect Areas of Outstanding Beauty and Areas of High Visual Amenity from inappropriate development and reinforce their character, distinctiveness and sense of place. LD POL 3 permits development in an Area of High Visual Amenity only where a very high standard of site selection, layout and design has been demonstrated and where the Planning Authority is satisfied that the development could not be accommodated in a less sensitive location. LD OBJ 4 seeks to protect Areas of Outstanding Natural Beauty and Areas of High Visual Amenity from inappropriate forms of development.

The County Leitrim Landscape Character Assessment identifies the relevant landscape as LCA 4, Arroo Mountain Outliers. Within EIAR Chapter 13, the applicant acknowledges that LCA 4 - Arroo Mountain and Outliers is recognised as a sensitive landscape and quotes the County Development Plan statement that 'the areas of moorland plateaus are particularly sensitive to change owing to the distinctive character of the mountain skylines, scenic quality, wilderness-like quality and visual openness'. While the applicant seeks to distinguish between the Area of Outstanding Natural Beauty and the Area of High Visual Amenity in which the proposed development is located, the County Development Plan nevertheless recognises the AHVA as a landscape of notable scenic and visual value. In my view, this distinction does not diminish the acknowledged sensitivity of the receiving landscape.

I do not believe that turbines of up to 185 metres in height, together with extensive associated roads, borrow pits, hardstands, drainage works and grid infrastructure, can be reconciled with the protection of the Dough Mountain Area of High Visual Amenity.

The applicant's own EIAR acknowledges the sensitivity of this landscape. In my opinion, the development would fundamentally alter the visual and landscape character of Dough Mountain, rather than protect or reinforce it.



Dough Mountain, viewed from the surrounding landscape, illustrating its prominent skyline and visual presence within the local area.



Blanket bog habitat and upland landscape on Dough Mountain.



Dough Mountain forms a prominent backdrop to Manorhamilton and the surrounding landscape.

Natura 2000, Appropriate Assessment and Cross-Border Effects

The AASR and NIS are central to my concerns. The AASR concludes that likely significant effects on European sites within the Zone of Influence cannot be excluded beyond reasonable scientific doubt. The report states that this conclusion was reached without taking mitigation measures into account and that the project should proceed to the next stage of Appropriate Assessment.

Of particular concern is the acknowledged pathway to Lough Melvin SAC in Northern Ireland. The AASR identifies the WFD river waterbody Lattone 35_010 as a potential pathway for likely significant effects between the proposed wind farm site and Lough Melvin SAC (NI). It states that, in the absence of mitigation, the proposed project has potential to result in likely significant effects on Lough Melvin SAC (NI) due to water quality degradation during construction, operation and decommissioning.

The Appropriate Assessment process must comply with Article 6(3) of the Habitats Directive. The relevant test is not whether adverse effects are unlikely, but whether they can be ruled out beyond reasonable scientific doubt.

The cross-border aspect is especially important. Fermanagh and Omagh District Council's consultation response, recorded in the AASR and EIAR Chapter 6, notes that the proposal has potential to have adverse impacts within Fermanagh and Omagh District and may engage the transboundary requirements of EIA legislation. It also highlights the importance of Northern Ireland biodiversity data, shared hydrological and hydrogeological systems, and the need to consider designated sites in Northern Ireland.

In my view, the existence of a hydrological pathway to a European site in Northern Ireland requires particularly careful scrutiny by An Coimisiún Pleanála. Given the acknowledged transboundary considerations and the existence of hydrological connectivity towards Northern Ireland, I am not satisfied that reasonable scientific doubt has been removed in relation to the relevant downstream and transboundary pathways identified in the application material.



Flash-flood event on Saddle Hill. Water from this drainage channel flows towards the Dooard River catchment, which forms part of the wider hydrological network associated with Lough Melvin SAC (Northern Ireland).

Karst Hydrology, Groundwater Vulnerability and Geological Heritage

The application identifies a complex hydrogeological setting characterised by karst features, groundwater vulnerability and extensive hydrological connectivity. Dough Mountain is not simply an upland peatland. It is also recognised as a County Geological Site and is included within *Leitrim – Geological Heritage Sites of County Leitrim* (Parkes, Meehan, Gallagher, Hennessy and Glanville, 2021), published by Geological Survey Ireland and Leitrim County Council. The audit identifies Dough Mountain as a distinctive geological landscape containing blanket peat, karst limestone, deep depressions (dolines), swallow holes, springs and underground drainage systems.



Karst fissures and cave openings within exposed limestone on Dough Mountain. These features demonstrate the presence of an interconnected karst system capable of transmitting water through underground pathways that may not be apparent from surface hydrology alone. The exposed limestone escarpment and associated karst features contribute to Dough Mountain's recognised geological heritage and its designation as a County Geological Site.

The application documents identify approximately 73 (Karst Assessment) to 76 (Planning Statement) karst features, including dolines and swallow holes. The site is also described as having high groundwater vulnerability and being underlain by a regionally important karstified conduit aquifer.

The Geological Heritage Audit notes that springs emerge from the mountain and subsequently disappear underground into enclosed depressions. It further records the presence of swallow holes, a vertical pothole system known as Polldough, and numerous dolines across the western side of the mountain. These features demonstrate that water movement within Dough Mountain is not confined to visible surface drainage channels but includes complex subsurface pathways through the underlying Carboniferous limestone.

The audit also identifies exceptionally straight drainage channels radiating from the mountain slopes and describes the overall hydrological arrangement as unusual. Such characteristics indicate a highly interconnected and sensitive water system where alterations to drainage patterns may have consequences extending beyond the immediate footprint of individual turbine locations. The Geological Heritage Audit identifies these karst and hydrological characteristics as forming part of the basis for Dough Mountain's recognition as a County Geological Site. The geological significance of the site is therefore not limited to individual features such as dolines or swallow holes but arises from the interaction between blanket peat, karst limestone, springs,

underground drainage systems and surface water processes. In this respect, the hydrological system itself forms part of the site's recognised geoheritage value.

This is highly significant. In karst terrain, water movement can be rapid, difficult to predict and poorly represented by surface drainage alone. This increases the importance of fully characterising groundwater pathways before permission is granted.

I note that a dye tracing exercise is referenced in the documentation. However, based on the material reviewed, I am not satisfied that the karst system has been characterised comprehensively enough to remove uncertainty regarding groundwater movement, contaminant pathways and downstream receptors. The documentation available to the public does not clearly demonstrate how the full extent of these underground hydrological connections has been established, nor whether any further dye tracing or equivalent investigation has been undertaken and made available within the public application documents to confirm the movement of water through the karst system. This is particularly relevant given the proximity of sensitive catchments, groundwater resources and downstream aquatic environments.

The interaction between excavation, peat drainage, groundwater vulnerability, karst features and downstream European sites is one of the most serious issues in this application. This uncertainty is particularly significant given that the applicant's own documentation identifies hydrological pathways extending beyond the site boundary towards sensitive downstream receptors, including European sites.

The Geological Heritage Audit recognises Dough Mountain not merely as an area of geological interest but as a rare combination of geological, geomorphological and hydrological features. In light of this recognised geoheritage value, the potential for permanent alteration of drainage patterns, peat hydrology and groundwater pathways should be assessed with a high degree of precaution.



Doline (karst depression) on Dough Mountain, illustrating the karst landscape and groundwater features described within the Geological Heritage Audit. The scale of the feature demonstrates the extent of karst development present within the site.

Peatland, Peat Stability and Carbon

The proposed development would involve substantial intervention within peatland and upland habitats, including the construction of turbine foundations, access tracks, hardstands, drainage infrastructure, borrow pits and construction compounds, as described in EIAR Chapter 2.

The applicant has undertaken both a qualitative peat landslide risk assessment and a deterministic peat stability assessment. The qualitative assessment uses hazard and exposure rankings derived from Scottish Government guidance, while the deterministic assessment applies numerical stability modelling. I therefore acknowledge that peat stability has been assessed and that turbine-specific Over Design Factor (ODF) values have been provided for turbines and associated infrastructure under a range of groundwater and loading scenarios.

However, I note that the reported ODF values vary significantly depending on the groundwater and loading assumptions applied. While the assessment concludes that all locations satisfy the applicant's stated stability criterion, a number of turbines and infrastructure locations achieve ODF values only marginally above the minimum threshold under certain scenarios. This suggests that the stability conclusions are sensitive to the assumptions adopted regarding groundwater conditions, peat properties and loading.

This concern is heightened where the lower margins arise under undrained and surcharge-loading scenarios, which are particularly relevant during construction when excavation, temporary peat storage, plant movement and drainage works may place additional pressure on already sensitive peat slopes.

Given the peatland setting of the site, the proposed drainage interventions, the scale of the development and the increasing frequency of extreme rainfall events, I consider it important that the Commission carefully scrutinise the assumptions underpinning the peat stability assessment and the robustness of the conclusions reached.

This issue is particularly important given the planning history of Dough Mountain. The previous An Bord Pleanála refusal identified concerns relating to blanket bog, surface-water pollution and slope instability. Those considerations remain material to the assessment of the current proposal, particularly as the present development is substantially larger in scale than the previously refused scheme.

I am also concerned about the treatment of peatland carbon impacts. EIAR Chapter 12 assesses greenhouse gas emissions arising from construction activities, including site clearance, peat removal, excavation, land-use change and forestry loss, and weighs these against the projected climate benefits of renewable energy generation. I acknowledge that these matters have been considered within the assessment.

However, Dough Mountain is not simply a future renewable energy site; it is also an existing carbon store, hydrological regulator and ecological resource. The application proposes the excavation, movement, temporary storage and reuse of substantial volumes of peat, including the placement of excavated peat within borrow pit restoration areas. While these measures are described within the application documentation, I am not satisfied that the long-term carbon implications of peat disturbance, drainage, storage, oxidation and restoration uncertainty have been presented in a sufficiently transparent manner to allow robust independent scrutiny.

Given the importance of peatlands within national climate policy and the acknowledged role of land use, land-use change and forestry emissions within Ireland's carbon budgets, I consider that the assumptions underpinning the peatland carbon balance, including the treatment of excavated peat and restoration outcomes, should be clearly presented, justified and subjected to appropriate sensitivity testing.

Biodiversity, Hen Harrier and Compensation Measures

The ecological sensitivity of the site is demonstrated by the concentration of protected species and habitats identified within the application documentation. These include breeding hen harrier, Marsh Fritillary habitat and confirmed larval webs, multiple protected bat species and roosts, hydrological pathways connected to catchments supporting White-clawed Crayfish, Atlantic Salmon, lamprey species and Otter, records of protected flora and lichen communities, and Annex I habitats including blanket bog, wet heath, dry heath and limestone pavement. The presence of hydrological pathways linking the site to catchments supporting these aquatic and semi-aquatic species demonstrates that ecological effects are not necessarily confined to the footprint of the proposed development itself, but have the potential to extend downstream through interconnected aquatic systems.

The application also identifies protected bat species, recorded bat activity and structures used as bat roosts. Where buildings or other structures may be removed, altered or affected by the proposed works, the assessment should clearly demonstrate that their bat-roost status, survey coverage and any necessary avoidance, mitigation or licensing measures have been fully considered before consent is granted. This is particularly important where the application itself identifies collision risk, disturbance, displacement and habitat loss as potential effects on bats.

Of particular note is the presence of Marsh Fritillary habitat together with confirmed Marsh Fritillary larval webs identified within and adjacent to the wider survey area, as shown in Figure 5-25 of EIAR Chapter 5. Marsh Fritillary is an Annex II species protected under the Habitats Directive and is recognised as being vulnerable to habitat fragmentation, drainage alteration and changes in land management. The identification of both suitable habitat and confirmed larval webs within and adjacent to the wider survey area reinforces the ecological importance and sensitivity of the site and wider landscape and demonstrates that the receiving environment supports species of European conservation importance.

The ecological importance of the area is further demonstrated by the presence of breeding hen harrier. EIAR Chapter 6, Ornithology, records that the Dough Mountain and Saddle Hill area has

supported 1–2 pairs of breeding hen harrier over a number of years. The chapter acknowledges the potential for disturbance during construction together with collision and displacement risks during the operational lifespan of the proposed wind farm.

EIAR Chapter 6 concludes that the proposed development is likely to result in significant disturbance and displacement effects on breeding hen harrier and assesses these effects as significant, long-term and negative at a national scale. The assessment adopts a precautionary approach to compensation, assuming the need to compensate for the potential loss of two breeding pairs and approximately 140 ha of foraging habitat.

Appendix 6-12 estimates effective foraging habitat loss of up to 140 ha over the lifetime of the project, taking account of forestry rotation cycles and habitat availability. In response, EIAR Chapter 6 proposes two Nesting Enhancement Areas together with 218.4 ha of habitat enhancement and management measures.

In my view, the need for compensation on this scale is itself evidence of the ecological sensitivity of the receiving environment. While compensation measures may seek to offset predicted impacts, they do not alter the fact that the development is proposed within habitat used by a protected Annex I bird species of high conservation importance. The scale of the proposed compensation indicates that the applicant accepts that substantial impacts on hen harrier habitat are likely to occur.

Taken together, the presence of protected birds, invertebrates, mammals, aquatic species, flora and Annex I habitats demonstrates that the receiving environment is of considerable ecological value. I therefore consider that the ecological sensitivity of the site should be viewed in the round, rather than through the lens of any single species. The cumulative presence of multiple protected species and habitats reinforces the need for a precautionary approach when assessing the suitability of this location for development at the scale proposed.



Marsh Fritillary larval web recorded within the wider survey area.

The Reliance on Mitigation and Compensation

A recurring theme throughout the application is the reliance on mitigation, compensation, monitoring and future management measures to address identified environmental risks and impacts.

This approach is evident across multiple documents, including the Natura Impact Statement, the Appropriate Assessment Screening Report, the Surface Water Management Plan, the Peat Stability Risk Assessment, the Karst Assessment, the Biodiversity Chapter, the Ornithology Chapter, the Hen Harrier compensation proposals and the Outline Biodiversity Management Plan.

I acknowledge that mitigation and compensation are legitimate components of the planning process. However, they do not remove the fundamental question of whether the receiving environment is suitable for a development of this scale and nature.

In this case, the application identifies hydrological pathways to European sites, karst vulnerability, peat stability considerations, significant effects on hen harrier requiring compensation, habitat enhancement requirements, extensive water management measures and long-term biodiversity management proposals. In my view, the extent of these measures illustrates the environmental sensitivity of the site and raises the question of whether the development is being made acceptable through layers of mitigation and compensation rather than demonstrating that the location is inherently suitable in the first instance.

Cumulative Environmental Sensitivity

While each of the issues discussed above is significant in its own right, I do not believe they should be considered in isolation.

The proposed development is located within a landscape that combines a number of acknowledged environmental constraints, including an Area of High Visual Amenity, sensitive upland landscape character, peatland habitats, extensive karst features, groundwater vulnerability, hydrological connectivity to European sites, protected species interests and habitat used by breeding hen harrier. The application documentation also identifies Marsh Fritillary habitat and confirmed larval webs, together with a range of other protected habitats and species.

The application responds to these constraints through multiple layers of mitigation, compensation, monitoring, habitat management, water management, peat management and environmental oversight measures. While I acknowledge that such measures form an important part of the environmental assessment process, their extent is, in my view, indicative of the exceptional sensitivity of the receiving environment.

The recurring theme throughout the application documentation is not the absence of environmental risk, but rather the need to manage, mitigate, compensate for and monitor a wide range of identified environmental effects. This pattern is evident across the Natura Impact Statement, Appropriate Assessment Screening Report, Karst Assessment, Peat Stability

Assessment, Surface Water Management Plan, Biodiversity Chapter, Ornithology Chapter, Hen Harrier compensation proposals and associated management plans.

In my view, the Commission's assessment should therefore consider not only the individual environmental topics in isolation, but also the cumulative picture that emerges from the application as a whole. When the landscape, hydrology, peatland, biodiversity, Natura 2000 and species-protection issues are considered together, they point consistently towards the conclusion that Dough Mountain is an environmentally sensitive and constrained location for development on the scale proposed.

The question before the Commission is therefore not simply whether individual impacts can be mitigated, but whether the cumulative evidence demonstrates that Dough Mountain is an appropriate location for a development of this scale and nature. Based on the application documentation reviewed, I am not satisfied that this has been demonstrated.

Community, Population and Human Health

Introduction

This section addresses the likely effects of the proposed development on the people who live, work and travel in the surrounding area. It does not suggest that every effect identified in other chapters will necessarily cause a clinical health outcome. Rather, it concerns whether the application has adequately considered the combined effect of noise, shadow flicker, visual change, construction activity, traffic, night-time deliveries and the existing industrial character of the wider upland landscape on ordinary residential amenity and wellbeing.

The applicant's Population and Human Health chapter relies substantially on conclusions reached in the technical chapters, particularly those dealing with noise, shadow flicker, traffic, landscape and ecology. While that is a reasonable starting point, it is important that the effects experienced by people are also considered as a whole. A community does not experience turbine noise, shadow flicker, construction traffic, visual change and disturbance as isolated technical categories. These effects are experienced together in the places where people live.

Compliance With Individual Limits Does Not Fully Address Community Effects

The application concludes that effects on human health will not be significant where predicted noise, shadow flicker and other emissions comply with the relevant guidance and limits. However, compliance with an individual numerical limit should not automatically be treated as a complete assessment of the effect on people living near the development.

This is particularly relevant in relation to wind turbine noise, where the experience of noise can depend not only on measured decibel level but also on timing, character, weather conditions, background quietness and the cumulative presence of other environmental effects. The assessment should therefore consider the lived experience of residents, particularly in a rural

setting where tranquillity, low background noise levels and the relationship between homes and the surrounding landscape form an important part of residential amenity.

The same applies to shadow flicker. A conclusion that modelled flicker exposure remains below a stated threshold does not remove the need to consider how intermittent moving shadows may be experienced in combination with turbine visibility, noise, construction activity and existing wind energy infrastructure in the surrounding area.

Combined and Interacting Effects on the Community

The proposed development would introduce fourteen turbines of up to approximately 185 metres in height, together with access roads, borrow pits, drainage works, an on-site substation, grid connection infrastructure and a substantial construction programme. These works would take place in an area already affected by commercial forestry and existing wind energy development.

The community is therefore not experiencing this proposal in isolation. The application itself identifies existing and proposed wind energy developments in the wider area, including the nearby Faughary Wind Farm and other wind energy projects within the cumulative assessment area. The effect on local residents should not be assessed solely by asking whether each individual project or impact falls below a particular threshold. The relevant question is what it means for the people living closest to the development to experience an additional large-scale wind farm within an already altered upland environment.

This includes the combined effect of:

- operational turbine noise;
- shadow flicker;
- the visual presence and movement of turbines;
- construction noise, dust and road works;
- traffic associated with turbine construction, concrete pours, aggregate deliveries and grid connection works;
- night-time abnormal-load deliveries;
- the presence of commercial forestry and existing turbines within the wider landscape; and
- the potential interaction of these effects with homes, farms, local roads, water supplies and daily life.

The application considers many of these matters separately. However, there appears to be limited consideration of their combined effect on the same homes and communities over the construction period and throughout the operational life of the development.

Night-Time Activity and Residential Amenity

The proposed abnormal-load deliveries are expected to take place primarily at night in order to avoid daytime traffic disruption. While this may reduce effects on daytime traffic flows, it does not remove the potential for disturbance to residents along the delivery route.

The movement of abnormal loads through Manorhamilton and along rural roads may involve escorts, temporary traffic controls, vehicle noise, reversing activity, lighting and short-term disruption during night-time hours. These effects are particularly relevant where deliveries pass close to occupied homes and through settled areas.

The traffic assessment addresses the delivery of abnormal loads mainly as a transport and road-management matter. The noise assessment focuses primarily on daytime traffic flows and construction activity. It is therefore unclear whether the disturbance associated with night-time abnormal-load convoys has been assessed in sufficient detail from the perspective of residents and sleep disturbance.

This does not mean that night-time deliveries could not be managed. However, the likely timing, frequency, route, duration and residential exposure should be sufficiently clear for the Commission to assess whether the effects on local amenity are acceptable.

Ordinary Rural Life and Local Activity

The area surrounding Dough Mountain is not an unoccupied upland landscape. It is a living rural area containing homes, farms, local roads, forestry operations and regular day-to-day activity.

Residents use local roads for school runs, work, farm movements, deliveries, visiting family, access to services and emergency travel. Farming activity may involve livestock movements, machinery, feed deliveries, veterinary access and seasonal work. These ordinary patterns of life can be affected by road restrictions, construction traffic, temporary closures, abnormal loads and changes to the local environment.

The assessment should therefore be grounded not only in traffic counts and modelled receptor points but also in the practical reality of how local people use the area. This is particularly important where the construction programme is expected to last for an extended period and involves works across the turbine site, access routes, borrow pits, watercourse crossings and the grid connection corridor.

Receptor Completeness

The reliability of the noise and shadow flicker assessments depends on the completeness of the sensitive-receptor schedule used by the applicant. Local survey work undertaken by Save Dough Mountain has identified dwellings that may not appear in the applicant's receptor schedule, including occupied homes and properties within or close to the shadow flicker study area.

The most important issue is not whether every building in the area will experience a significant effect. It is whether the assessment has identified all occupied dwellings and all relevant residential receptors before reaching conclusions about the nearest and worst affected properties.

Where an occupied home has been omitted from the schedule, it cannot have been assessed for operational noise or shadow flicker. This creates uncertainty as to whether the assessment has captured the full range of affected residents.

There is also a separate issue in relation to dwellings classified as vacant or derelict. Some of these are located close to proposed turbines or within the shadow flicker study area. Their current condition may be relevant to whether they are treated as sensitive receptors, but the basis for their classification should be clear and evidence-based. In a rural area where vacant and older dwellings may be repaired, reused or returned to occupation, it is not necessarily appropriate to assume that all such buildings can be disregarded throughout the operational life of a long-term development.

The local survey material should be fully verified before submission, including photographs, locations, measured distances and confirmation of occupation where relevant. Once verified, it should be considered alongside the applicant's receptor schedule and noise and flicker assessments.

Landscape, Enclosure and Residential Amenity

The surrounding landscape is already shaped by extensive commercial forestry, existing wind energy development and other large-scale land uses. The proposed development would add fourteen very large turbines to this setting.

For people living in the area, the effect is not limited to views from designated viewpoints. It includes the daily experience of travelling local roads, looking out from homes and farms, moving through the landscape and living near an increasingly industrialised upland environment.

The application should therefore consider whether the existing baseline has been described realistically. A community already living beside commercial forestry and existing turbines may experience the addition of a further large wind farm differently from a community in an otherwise open and undeveloped landscape.

This is not an argument that development cannot take place in a working rural landscape. It is an argument that the existing environmental burden should be recognised when assessing the additional effect of this proposal on residential amenity, tranquillity and wellbeing.

Community, Population and Human Health Conclusion

The proposed development should be assessed not only as a series of separate technical effects but also from the perspective of the people who will live with those effects together.

The Commission should be satisfied that the assessment adequately addresses:

- the combined effect of operational noise, shadow flicker, visual change, construction activity, traffic and existing wind energy development;
- the likely residential effects of night-time abnormal-load deliveries;

- the practical effect of construction and transport activity on ordinary rural life, including farming, school runs, local access and emergency travel;
- the completeness and accuracy of the residential receptor schedule used for noise and shadow flicker assessment; and
- the cumulative effect of additional large-scale wind energy infrastructure within an already altered upland landscape.

In my view, these matters require careful consideration before any decision is made. The community should not be assessed as an abstract set of receptor points or modelled thresholds. It should be assessed as a living rural area whose residents will experience the full development, and its associated infrastructure, as part of their everyday lives.

Overall Conclusion

Having reviewed the application, the EIAR, the Natura Impact Statement, the Appropriate Assessment Screening Report and the relevant planning policy framework, I am not satisfied that the applicant has demonstrated that Dough Mountain is a suitable location for the proposed development.

The Leitrim County Development Plan supports renewable energy subject to proper planning and environmental considerations. The Renewable Energy Strategy states that there are no areas where new wind turbines would be considered acceptable in principle. The Landscape Character Assessment identifies the relevant upland landscape as particularly sensitive to change. The site lies within the B3 Dough Mountain Area of High Visual Amenity. The Appropriate Assessment Screening Report identifies a hydrological pathway to Lough Melvin SAC in Northern Ireland and concludes that likely significant effects cannot be excluded without further assessment. The application acknowledges karst features, groundwater vulnerability, peat stability concerns, significant impacts on breeding hen harrier and the need for extensive mitigation, compensation and management measures.

Importantly, these issues do not arise in isolation but interact through a shared landscape, hydrological and ecological system. Taken together, these matters point to the same conclusion: Dough Mountain is an environmentally sensitive and constrained location. While I support the transition to renewable energy and recognise its importance in addressing climate change and energy security, I do not believe that every location is appropriate for development. In my view, the applicant has not demonstrated that this proposal can be accommodated at Dough Mountain without unacceptable risk to the environment, landscape, biodiversity, water environment and the qualities that make this area distinctive.

For these reasons, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Kind Regards,
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