

Kiltyclogher Community Council

Kiltyclogher Community Centre

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SUBMISSION / OBSERVATION

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 7 July 2026

RE: Strategic Infrastructure Development Application - Lissinagroagh Wind Farm, County Leitrim

PAX Reference Number: PAX12.324290

Development Proposed: Dough Mountain (Lissinagroagh) Wind Farm

Case Reference: PAX12.324290

Locations: Boleyboy, Cashelaveela, Cherrybrook, Killea, Cooldonnell, Faughery, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherney, Co. Leitrim

Wind Farm Planning Application Number: ACP-323048-25

Grid Connection Planning Application Number: ACP-323353-25

Design Flexibility Option Application Number: ACP-323910-25

Applicant: FuturEnergy Lissinagroagh DAC

Submission on behalf of: Kiltyclogher Community Council, Co. Leitrim

Dear Sir/Madam,

Kiltyclogher Community Council makes this formal submission to express its strong objection to the proposed Lissinagroagh Wind Farm, PAX Reference Number PAX12.324290, Planning Application Number ACP-323048-25, the associated Grid Connection, Planning Application Number ACP-323353-25, and the Design Flexibility Option, Application Number ACP-323910-25.

The proposal is for a major industrial wind energy development known as the Dough Mountain (Lissinagroagh) Wind Farm, Case Reference PAX12.324290, located across or affecting Boleyboy, Cashelaveela, Cherrybrook, Killea, Cooldonnell, Faughery, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherney, Co. Leitrim, including the uplands of Dough Mountain, Thur Mountain, Saddle Hill and the wider Kiltyclogher area. The landscape is of exceptional importance to the community, local tourism, heritage, water quality, wildlife, angling, farming and rural life.

Kiltyclogher is a small rural community whose future depends on heritage, nature-based tourism, walking, outdoor recreation, wildlife, farming, caving, river amenities, angling, cultural integration, crafts, music and the protection of the surrounding mountain landscape. The proposed development would fundamentally undermine the social, economic, environmental and cultural future of the village.

The applicant's Environmental Impact Assessment Report (EIAR) and related documentation do not adequately assess the direct, indirect or cumulative impacts of the proposed development on Kiltyclogher, its approved community-led tourism projects, its landscape setting, its water environment, its heritage, its wildlife, its community facilities, or its future economic development.

Kiltyclogher Community Council respectfully requests that An Coimisiún Pleanála refuse permission for the wind farm, the associated grid connection and the design flexibility option.

1. Fundamental Flaws in the EIAR: Population and Human Health / Socio-Economic Impact

The EIAR fails to properly identify, assess or value the local community infrastructure and economic activity already developed, approved, funded and promoted by Kiltyclogher Community Council.

The community has invested significant voluntary effort, public funding and local resources into developing Kiltyclogher as a sustainable rural tourism destination. This includes local forest walks, nature trails, heritage tourism, river walks, cultural tourism, outdoor recreation, accommodation-based visitor activity, angling, playground facilities and the improvement of the Fair Green as a community and visitor amenity.

A particularly serious omission is the failure of the EIAR to properly consider the community's approved campervan and tent site adjacent to Kiltyclogher Community Centre. This project has successfully received planning approval and will shortly begin construction. It has also received substantial grant funding and is being developed with the involvement of Leitrim County Council and tourism bodies.

This is not a speculative or aspirational project. It is an approved, funded and imminent community-led tourism investment.

The site is intended to allow visitors to stay in Kiltyclogher and enjoy the village, mountain views, walking routes, heritage assets, rivers, wildlife, angling, rural landscape and wider tourism amenities. The proposed campervan and tent site faces towards the mountain landscape. The introduction of 180-185 metre industrial turbines, associated access tracks, hardstands, borrow pits, cabling, construction compounds and grid infrastructure would severely damage the visual setting and attractiveness of this approved community tourism facility.

Kiltyclogher Community Council has also received grant funding for the extension of the playground and the improvement of the surrounding Fair Green, with works due to commence later this year. This further demonstrates that Kiltyclogher is actively investing in community amenity, family facilities, tourism, recreation and village renewal.

The EIAR therefore fails to assess a real and material impact on Kiltyclogher's local economy and community development. This is not an abstract concern. It is a direct threat to approved, funded and imminent community assets supported by public investment.



Photograph 2. View of Dough Mountain from the proposed caravan parking area behind Kiltyclogher Holiday Centre.

2. Depopulation, Community Regeneration and the Kilty Live Campaign

Kiltyclogher is a small rural village that has faced serious threat from depopulation. Like many rural communities in North Leitrim and the west of Ireland, its future depends on attracting families, supporting local services, sustaining community life and creating a viable rural economy.

In 2017, the community launched a national campaign known as “Kilty Live”. This campaign received national media attention and successfully attracted more than 10 families from across Ireland to move to Kiltyclogher. Since that time, families and individuals of numerous nationalities have also moved to the area.

Kiltyclogher is now recognised for cultural integration, crafts, music, community spirit and rural regeneration. This did not happen by accident. It is the result of sustained community work, voluntary effort, local leadership and public support.

The proposed wind farm would directly undermine this regeneration. A village that is working to attract families, visitors, craftspeople, musicians, remote workers and new residents depends on the quality of its landscape, environment, water, peace, heritage and community amenities.

The EIAR fails to assess the impact of the proposed development on Kiltyclogher’s wider regeneration strategy. It treats the village as a static location rather than as a living community actively fighting depopulation and building a sustainable future.

The Board should give significant weight to the fact that Kiltyclogher has already demonstrated successful rural regeneration through the Kilty Live campaign. The proposed industrialisation of the mountain landscape would place that progress at risk and would conflict with national and local objectives to sustain rural communities.

3. Impact on Kiltyclogher's Tourism Economy

Kiltyclogher's tourism offering is based on its rural setting, quiet landscape, mountain views, heritage, wildlife, walking routes, river walks, caving activity, angling, outdoor recreation and community-led facilities.

The village has a holiday accommodation centre, and cavers regularly use the area. Visitors come to Kiltyclogher because of the natural environment and its unspoilt rural character. The proposed development would industrialise the mountain backdrop that forms the foundation of this tourism economy.

The EIAR does not adequately assess the multiplier effect of tourism in a small rural village. A loss of scenic value affects accommodation providers, small businesses, community facilities, walking tourism, heritage tourism, angling, caving, outdoor recreation and day visitors.

The proposed development would damage the very assets that Kiltyclogher is relying on for its future survival.



Photograph 3. Kiltyclogher Heritage Centre.

4. Kiltyclogher Heritage Centre and Heritage Tourism

Kiltyclogher Heritage Centre plays a central role in local cultural tourism. It provides tours connected with Seán Mac Diarmada's home and other heritage sites, including walking tours and river walks.

These heritage experiences depend on the relationship between the village, its history, its townlands, its rivers, and the surrounding uplands. The landscape is not merely a background view. It is part of the heritage experience.

The proposed wind farm would impose large-scale industrial infrastructure into this setting. This would undermine the authenticity and integrity of the heritage tourism experience promoted by the community.

The wider area contains important heritage features including Tullyskeherny Court Tomb, Straduffly Mass Rock, Prince Connell's Grave, the Black Pig's Dyke at Corracloona, and other local archaeological, cultural and historic sites. These are not isolated features. They form part of a connected historic landscape which is central to the identity and visitor appeal of Kiltyclogher.

The Board should not treat the surrounding mountain and upland landscape as an empty industrial site. It is a living heritage landscape.



Photograph 6. Tullyskeherny Court Tomb / National Monument area.

5. Direct Threat to Recorded Archaeological Monuments and the Wider Prehistoric Landscape

Kiltyclogher Community Council is profoundly concerned that the proposed development threatens recorded archaeological monuments at Saddle Hill, Shasmore. The National Monuments Service records identify important prehistoric features in this landscape, including LE008-005 (Megalithic Tomb / Cairn, Saddle Hill, Shasmore) and LE008-006002 (Cist burial site, Saddle Hill, Shasmore).

These are not minor features. A megalithic tomb, cairn or cist burial is part of the prehistoric burial and ritual landscape of the area. Such monuments must be protected not only from direct physical damage, but also from inappropriate development within their setting.

The discovery and recognition of the court tomb at Tullyskeherny demonstrates that this upland landscape contains significant Neolithic archaeology and that not all important features were previously known or fully understood. The area is not archaeologically exhausted, fully mapped or safely understood. Further unrecorded archaeology may exist, particularly beneath forestry, peat, rough ground or disturbed land.

The EIAR is inadequate if it treats archaeological sites as isolated points and fails to assess the upland ridges, skylines, sightlines and monument relationships as part of a connected prehistoric landscape. Fourteen turbines of 185 metres in height would fundamentally alter the setting of these monuments.



Photograph 4. Saddle Hill.



Photograph 5. Area of recorded monuments LE008-005 and LE008-006002 on Saddle Hill, Shasmore.

6. Direct Conflict with Strategic Walking Routes and Future Recreation Plans

Kiltyclogher Community Council has a long-standing desire and strategy to extend and link local trail networks into the wider regional walking network, including potential links towards the Leitrim Way via the Dough Mountain route to Manorhamilton.

The community also wishes to develop supporting recreational infrastructure such as shelters, signage and viewing areas.

The EIAR relies heavily on existing baseline recreational data and does not properly assess approved, planned or emerging community recreational assets. Rural communities are entitled to develop future tourism and recreation projects, and those projects should not be ignored simply because they are being advanced by community bodies rather than by a private developer.

The proposed walking route from Seán Mac Diarmada's Cottage towards Thur Mountain is a clear example of the community's strategic recreational planning. This route would connect local heritage, the Corracloona Link Trail, Flynn's Lane to the Glenfarne Road, scenic viewing points, Lough Melvin views, and the wider upland landscape.

By placing large-scale industrial infrastructure across this mountain setting and viewing corridor, the proposed development would permanently prejudice the creation of an important heritage and walking tourism link.



Photograph 11. Thur Mountain river walk connecting Kiltyclogher to Lough Melvin.

7. Landscape and Visual Impact

The proposed turbines, with a blade tip height of up to approximately 180-185 metres, would be completely out of scale with the rural landscape around Kiltyclogher.

The turbines would dominate views from the village, the community centre, the approved campervan and tent site, local roads, walking routes, farms, homes and recreational areas.

The EIAR's Landscape and Visual Impact Assessment does not adequately capture the real lived experience of local people and visitors. Photomontages and Zone of Visual Influence mapping cannot replace the direct reality of placing 185 metre turbines on elevated upland ground above a small rural village.

The visual impact would not simply be visibility. It would be dominance. The development would permanently alter the identity, character and tourism value of Kiltyclogher.

The Board should also consider cumulative visual pressure. The wider North Leitrim landscape already contains wind energy infrastructure. The addition of a further 14 turbines of this scale on the uplands above Kiltyclogher would contribute to landscape saturation and would further erode the rural, scenic and tourism character of the area.



Photograph 1. View of Dough Mountain from the Catholic Church in Kiltyclogher.



Photograph 14. Faughery Wind Farm from summit of Dough Mountain.

8. Material Conflict with Rural Tourism, Heritage and Community Development Policy

North Leitrim already carries a significant burden of wind energy infrastructure. The area is at risk of cumulative landscape saturation.

The proposed development conflicts with the protection of sensitive upland zones, blanket bogs, scenic skylines, rural tourism assets and community-led development objectives.

Kiltyclogher Community Council submits that the Board must give proper weight to the local development model being pursued by the community. This model is based on ecotourism, heritage tourism, outdoor recreation, walking, wildlife, angling, caving, family recreation and small-scale rural enterprise.

A development that destroys or devalues these assets cannot be described as sustainable development.

9. Impact on Angling Tourism, Fisheries and Water-Based Recreation

Fishing is a major tourist attraction in the Kiltyclogher and wider North Leitrim area and is a key feature in how the area is promoted to visitors.

Anglers use Dean's Lake, the County River, Lough Melvin and Lough MacNea as important fishing waters. These waters are not only environmental receptors. They are central to the local tourism economy, visitor accommodation, community identity and rural recreation.

Annual international fishing competitions are held on both Lough Melvin and Lough MacNea. These events bring visitors into the wider area and support local businesses, accommodation providers, shops, hospitality, guides and community facilities.

The proposed wind farm would involve extensive construction works on upland peat and sloping ground, including turbine foundations, borrow pits, access roads, drainage works, forestry clearance, cabling,

construction compounds and heavy vehicle movements. These works create a risk of sediment runoff, peat washout, altered drainage, concrete contamination, hydrocarbons and other pollutants entering streams, rivers and downstream lakes.

Any deterioration in water quality could damage fish habitats, spawning areas, aquatic ecology and the reputation of the area as a high-quality angling destination. Even a perceived risk to water quality could undermine tourism confidence and harm the area's angling economy.

The EIAR does not adequately assess the importance of angling tourism to Kiltyclogher and the surrounding area. It also fails to properly consider the economic and reputational consequences of pollution, sedimentation or hydrological disturbance affecting Dean's Lake, the County River, Lough Melvin and Lough MacNean.

10. Destruction of Carbon-Rich Peatland and Climate Contradiction

The stated purpose of wind energy is to reduce greenhouse gas emissions. However, the selection of sensitive upland peat and bog systems for a development of this scale directly undermines that objective.

Peatlands are important natural carbon stores. The excavation of peat for turbine bases, access roads, borrow pits, drainage, cable trenches, hardstands and construction compounds risks releasing stored carbon and damaging the natural hydrological conditions that allow peatlands to function.

The creation of roads, trenches and drainage channels can permanently alter the water table. Once peat dries out, it can decompose and release carbon over the long term.

The EIAR does not adequately resolve the contradiction between renewable energy generation and the destruction or disturbance of carbon-rich upland peatland.

The Board should not accept a narrow climate argument that counts only electricity generation while ignoring the carbon, hydrological and ecological functions of peatland. Renewable energy policy cannot justify avoidable damage to sensitive carbon-rich upland peat where less damaging alternatives may exist.



Photograph 9. Upland peat and blanket bog habitat at summit of Dough Mountain, approximately 465 metres above sea level.

11. Peat Stability, Slope Instability and Landslide Risk

The proposed development is located in a sensitive upland environment with peat, steep slopes, forestry, watercourses and rapid drainage pathways towards the valleys below.

The construction of heavy industrial infrastructure on such ground raises serious concerns regarding peat stability, erosion, slope failure and peat slippage.

A peat slide or significant sediment release would have serious consequences for local rivers, downstream habitats, fisheries, water quality, farms, roads, homes and communities.

Local photographic evidence shows exposed peat faces, cutaway bog, wet upland peat, heather, mosses, pools and vulnerable ground conditions. These features support the community's concern that the area is not suitable for large-scale industrial construction.

Given the history of peat instability concerns in upland wind farm developments, and given the sensitivity of Dough Mountain and its drainage systems, the precautionary principle should apply.

The Board should not grant permission where there remains uncertainty about peat stability and downstream impacts.



Photograph 10. Steep slopes and watercourses on Dough Mountain.

12. Hydrology, Water Quality and Protected Catchments

The proposed development presents unacceptable risks to the hydrology and water quality of North Leitrim.

Construction works would include turbine foundations, deep excavations, access roads, grid trenches, forestry clearance, borrow pits, concrete works, drainage alterations and heavy machinery activity on upland peat and sloping ground.

These works create a risk of sediment, peat runoff, hydrocarbons, concrete washout and other pollutants entering local streams and rivers.

Water from the Dough Mountain area drains towards sensitive downstream catchments, including the Sraduffy River, County River and ultimately the Lough Melvin catchment. Wider concerns also arise for the Lough Gill and Lough MacNean catchments in the broader upland area.

Lough Melvin is an internationally important water body and supports sensitive fish species and habitats. It is also central to local tourism, angling, recreation and community identity.

Local evidence shows how quickly floodwater can move through the connected river system into Lough Melvin. Any sediment, peat washout, hydrocarbons, concrete contamination or construction-related pollution could therefore be carried downstream into sensitive waters.

Any deterioration in water quality would be contrary to the principles of the Water Framework Directive and would undermine both ecological protection and local economic activity.

The EIAR has not demonstrated beyond reasonable scientific doubt that the development would avoid adverse effects on water quality, hydrology, fisheries and protected downstream receptors.

13. Protection of the County River, Public Health and Public Investment in Wastewater Infrastructure

Kiltyclogher Community Council is also concerned that the EIAR fails to give adequate weight to the importance of the County River as a local environmental, community and public health receptor.

Uisce Éireann, formerly Irish Water, has invested significant public money in installing and upgrading the local wastewater treatment plant in Kiltyclogher village, adjacent to the County River. This investment has contributed to improving the quality status of the river and protecting the local water environment.

It would be entirely contrary to the purpose of this public investment to permit a major upland industrial development that introduces new risks of sedimentation, peat runoff, hydrological disturbance, hydrocarbons, concrete contamination or other pollution into the connected river system.

Although Kiltyclogher village is upstream of the Lattone River, the County River forms part of the wider connected catchment. Any pollution or deterioration in water quality would not remain isolated. It could affect downstream habitats, fisheries, farms, recreation, tourism, angling and community wellbeing across North Leitrim.

Clean water is fundamental to public health, rural life, tourism, farming, fisheries and the wellbeing of every person living in the area. The protection of the County River and its connected waters should therefore be treated as a major planning consideration.

14. Karst, Underground Drainage and Unresolved Scientific Uncertainty

There are serious local concerns regarding karst features, underground drainage, caves, swallow holes and uncertain groundwater connectivity in the wider area.

Where there is uncertainty regarding underground water movement, dye tracing, karst testing and hydrogeological connectivity should be central to assessment. The absence of adequate testing means the Board cannot be satisfied that pollutants or sediment would not enter underground pathways and emerge in sensitive watercourses.

Local photographic evidence shows cave and swallow-hole features. These features support the community's concern that underground drainage, karst pathways and groundwater connectivity have not been adequately assessed.

Where swallow holes, caves or underground water movement exist, pollutants and sediment may travel in ways that are difficult to predict or monitor. This makes the absence of adequate karst testing and dye tracing a serious deficiency.

This uncertainty is especially serious given the connection between upland drainage, local rivers and protected downstream waters.

The EIAR is therefore inadequate in its assessment of karst and groundwater risk.



Photograph 7. Cave / karst feature near Tullyskeherney Tomb.



Photograph 8. Swallow hole on slopes of Dough Mountain showing water flow into ground.

15. Aquatic Ecology, Species and Macroinvertebrate Risk

The absence of adequate hydrological certainty also affects aquatic ecology. A pollution or sediment event arising from construction on the uplands could affect sensitive downstream catchments and species.

The wider catchments include waters associated with Atlantic Salmon, White-clawed Crayfish, Otter, lamprey species, Arctic Charr, Gillaroo Trout, Sonaghan Trout, Ferox Trout and European Eel. These species and their food webs depend on clean water, stable river beds, functioning spawning gravels, and healthy macroinvertebrate communities.

Fine peat silt, concrete washout, hydrocarbon contamination or sudden sediment pulses can damage spawning gravels, clog gills, smother benthic habitat, reduce macroinvertebrate food sources and undermine aquatic food chains.

The Board should not accept mitigation that assumes predictable surface flow where local evidence indicates karst features, swallow holes, steep slopes, peat and rapid flood pathways.

16. Failure to Assess the Wind Farm, Grid Connection and Associated Works as One Project

Kiltyclogher Community Council is deeply concerned that the wind farm and the grid connection are being advanced through separate planning tracks.

The wind farm cannot operate without a grid connection. The grid connection is therefore not a separate or optional project in practical terms. It is an essential part of the overall development.

By splitting the applications, the full cumulative environmental and community impact is obscured. The underground cabling, substations, trenching, construction access, road works and associated disturbance must be assessed together with the wind farm.

The separation of the wind farm application, the grid connection application and the design flexibility option makes it extremely difficult for ordinary members of the public to understand and assess the complete development. It also risks masking the total extent of civil works, excavation, traffic, drainage disturbance, water risk and permanent industrialisation.

The Board should not permit a fragmented approach that prevents the public and decision-makers from assessing the full project in one complete environmental assessment.

17. Permanent Industrialisation of the Landscape

The proposed development would not be limited to temporary construction impacts. It would permanently change the character of the area.

The turbines, internal roads, hardstands, drainage systems, substation, grid infrastructure and altered landscape would convert a rural upland environment into an industrial energy landscape.

Even where turbines have an operational lifespan, elements of the associated infrastructure may remain. The long-term consequence is the industrialisation of a sensitive rural area that currently supports tourism, farming, heritage, wildlife and recreation.

This impact has not been adequately acknowledged in the EIAR.

18. The Contradictory 10-Year Permission and Design Flexibility Option

The applicant's request for a 10-year planning permission period, together with the Design Flexibility Option under Application Number ACP-323910-25, is unacceptable for a development of this scale and sensitivity.

A 10-year permission would create prolonged uncertainty for Kiltyclogher and surrounding communities. It would place community investment, tourism development, local accommodation, walking routes, angling tourism, playground development, the Fair Green improvements and business planning under a long-term shadow.

It is unfair and unreasonable to impose planning blight on a small rural community for up to a decade.

The Design Flexibility Option also raises serious concerns. If turbine specifications, blade dimensions, infrastructure layout, construction details, or associated works may change, then the current EIAR cannot provide a complete and reliable assessment of the actual development that may ultimately be built.

Public consultation is undermined if the public is asked to comment on one version of a project while the developer retains flexibility to alter key elements later.

This is especially serious where the Wind Farm Planning Application, the Grid Connection Planning Application and the Design Flexibility Option are being presented under separate application numbers. The community is being asked to assess a fragmented and potentially changing project without a clear, fixed and complete understanding of the final development.

19. Noise, Shadow Flicker and Residential Amenity

The proposed turbines would introduce noise, movement, shadow flicker, lighting and visual dominance into a quiet rural setting.

The assessment of these impacts must consider the cumulative effect of 14 turbines on homes, farms, local roads, recreational users, visitors and community amenities.

The peaceful rural character of Kiltyclogher is one of its most important assets. It supports quality of life, tourism, walking, heritage, wildlife observation, angling and outdoor recreation.

The EIAR does not adequately address the loss of this amenity.

20. Wildlife, Habitat, Migratory Birds and Eco-Tourism Impacts

The area around Dough Mountain, Dean's Lake, the County River and the wider Kiltyclogher landscape supports important wildlife and forms part of the natural tourism appeal of the village.

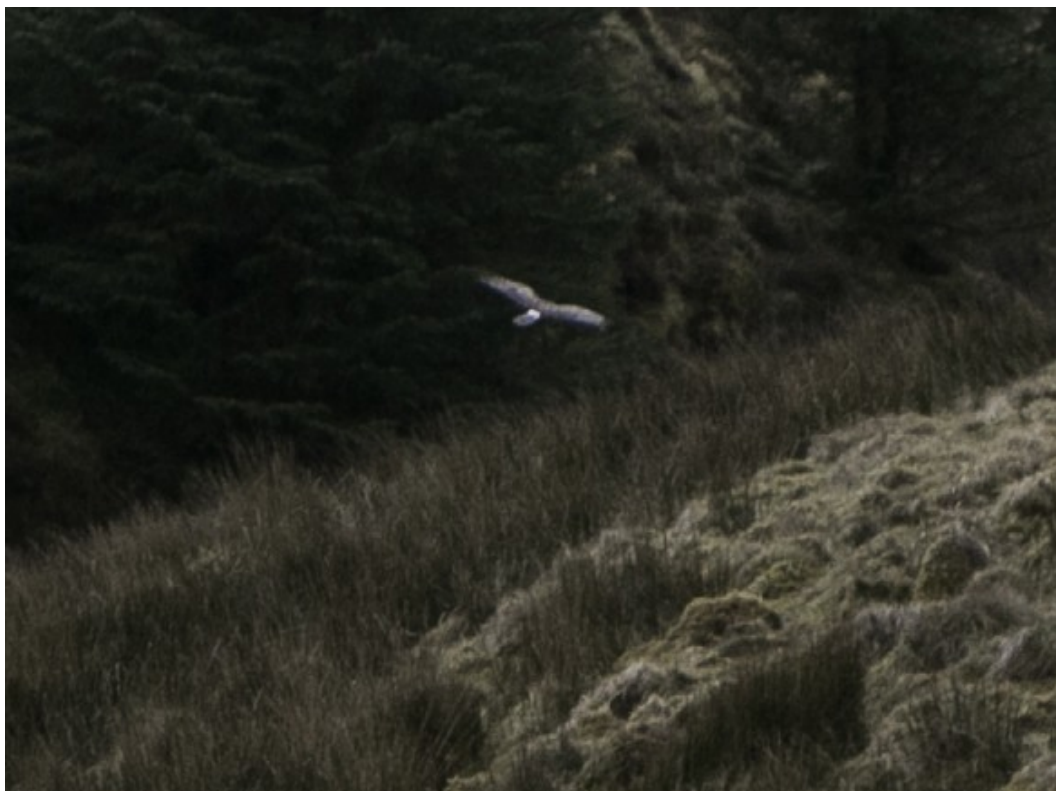
Local people and visitors regularly observe flocks of Whooper Swans, Hen Harriers, Buzzards, Kestrels, Herons and ducks flying over Dough Mountain, stopping over, hunting, feeding or circling Dean's Lake and the surrounding landscape. This demonstrates that the area is not simply commercial forestry or empty upland. It is part of a wider ecological network used by resident and migratory birds.

Dean's Lake is especially important in this regard. The lake and surrounding fields provide habitat, feeding and movement corridors for birds and other wildlife. Otters have been photographed in Dean's Lake, and Marsh Fritillary butterfly habitat has been identified in fields overlooking the lake. These are important ecological indicators and should have been properly assessed in the EIAR.

The area is also of long-standing tourism importance because of its wildlife. In the 1990s, Leitrim County Council and other State bodies were involved in establishing a tourist trail in Kiltyclogher known as the Kingfisher Trail, reflecting the regular presence of Kingfishers along the local river banks. This is an important example of how local wildlife has been used for decades to promote sustainable rural tourism in the village.

Local photographic evidence includes a female Hen Harrier in the wider Kiltyclogher/Dough Mountain landscape and an Irish Hare on the Lissinagroagh Wind Farm site. The proposed wind farm would introduce large-scale turbines, access roads, borrow pits, hardstands, cabling, construction traffic, tree felling, noise, lighting and long-term operational disturbance into this connected ecological and tourism landscape.

Wildlife is not only an environmental issue. It is central to Kiltyclogher's identity, tourism economy, community wellbeing and future development. The Board should apply the precautionary principle where there is uncertainty regarding protected species, migratory birds, aquatic habitats, ecological connectivity and the cumulative impact of the proposed development.



Photograph 12. Female Hen Harrier / raptor habitat in the wider Dough Mountain landscape.



Photograph 13. Irish Hare on Lissinagroagh Wind Farm site.

21. Transboundary and Downstream Water Concerns

The water systems of North Leitrim do not stop at local or county boundaries. The wider area has hydrological connections to internationally important and cross-border water bodies.

A major upland industrial development that risks sedimentation, altered drainage or pollution has potential implications beyond the immediate turbine locations.

The EIAR does not adequately address the shared catchment responsibilities associated with Lough Melvin, Lough MacNea, Lough Gill and connected rivers.

The Board should not permit a development that could undermine cooperative conservation, water quality protection or the non-deterioration requirements of the Water Framework Directive.

Northern Ireland, Donegal, Sligo and downstream communities all have an interest in the protection of shared waters, fisheries, habitats and tourism amenities. The absence of a response from any body or jurisdiction should not be treated as evidence of no impact.

22. Inadequate Assessment of Community-Led Development

The EIAR treats Kiltyclogher as a passive receptor rather than an active community with its own approved, funded and developing projects.

This is a major flaw. Kiltyclogher Community Council is working to build a future based on sustainable tourism, heritage, nature, walking, accommodation, recreation, playground facilities, the Fair Green, rural enterprise and community-led regeneration.

The proposed wind farm would directly conflict with that future.

The campervan and tent site adjacent to Kiltyclogher Community Centre has received planning approval, has secured significant grant support, and will shortly proceed to construction. Leitrim County Council and

tourism bodies are involved in its development. The EIAR should have identified and assessed this project as a key local tourism receptor and as a publicly supported community investment.

The Community Council has also secured grant funding for the extension of the playground and the enhancement of the surrounding Fair Green, with works due to commence later this year. These works form part of a wider community strategy to improve Kiltyclogher as a place to live, visit and stay.

A proper assessment should have included detailed engagement with Kiltyclogher Community Council, assessment of the approved campervan and tent site, assessment of the playground and Fair Green improvements, assessment of walking route ambitions, assessment of heritage tourism, assessment of the holiday accommodation centre, assessment of caving activity, assessment of angling tourism, assessment of wildlife tourism, and assessment of the cumulative tourism economy.

This has not been done. The failure to assess these approved and funded community projects is a material omission in the EIAR.

23. Inadequate Public Consultation

The consultation process has not been adequate for a project of this scale and significance.

A development that would affect Kiltyclogher village, local roads, tourism, rivers, farms, heritage, community facilities and the mountain landscape should have involved clear, accessible and meaningful engagement with the community.

The community should have been fully informed about the wind farm, grid connection, transport route, construction impacts, cumulative effects, environmental risks and alternatives.

Instead, the project has been presented in a fragmented manner, with separate application references for the wind farm, grid connection and design flexibility option. This makes it difficult for ordinary members of the public to understand the full extent of what is proposed.

Kiltyclogher Community Council also wishes to place on record that Joseph Sheerin emailed Bernard Greene MIPI, Senior Planner with Leitrim County Council, on 1 April 2026 regarding the inadequate public consultation carried out by FuturEnergy and its consultants. The email raised concerns that the consultation event was held in Rossinver Community Centre, an isolated location with poor public transport access, that the event was by appointment only, that attendance opportunities were limited, and that the consultation material did not properly represent the visual and community impact on Kiltyclogher.

In his reply of 1 April 2026, Bernard Greene stated that he had no role in the manner in which an applicant undertakes pre-application consultation, particularly where the application was expected to be submitted to An Coimisiún Pleanála. However, he also confirmed that Leitrim County Council had made its view clear to the promoters and their consultants regarding the venue chosen. He stated that Manorhamilton should have been chosen, having regard to the proximity of the development to the second largest town in the county and the availability of the Bee Park Centre.

This correspondence is important because it shows that concerns regarding the inadequacy and accessibility of FuturEnergy's public consultation were raised before the application was lodged, and that Leitrim County Council itself had expressed concern about the choice of venue. Despite this, the developer did not provide proper public meetings in Manorhamilton or in the affected local villages, including Kiltyclogher.

This supports the Community Council's position that the public consultation process was inadequate, inaccessible and not meaningful for a project of this scale.

24. Unsuitability in Principle of the Upland Site

Kiltyclogher Community Council adopts the core planning concern raised in Joseph Sheerin's individual objection: this is not a development where minor conditions or post-consent mitigation can make an unsuitable site acceptable. The central issue is suitability in principle.

Dough Mountain, Thur Mountain, Saddle Hill, Shasmore, Tullysheherny, Straduffy, Corracloona and the surrounding upland landscape form a connected system of blanket bog, forestry, steep slopes, karst, watercourses, heritage features, wildlife habitat and community views. The proposed development would place fourteen turbines of up to approximately 185 metres, together with borrow pits, hardstands, roads, drainage works, cabling, forestry clearance and construction compounds, into this sensitive system.

Kiltyclogher Community Council submits that this landscape is not suitable for an industrial wind farm of this scale. Reducing turbine numbers or promising mitigation does not alter the underlying problem: the development is proposed in the wrong place.

25. GSI and EPA Mapping Evidence: Peat, Landslide Risk, Drainage and Protected Waters

The Community Council also relies on the GSI and EPA mapping evidence identified in Joseph Sheerin's objection. That evidence shows a wider upland system of blanket peat, mapped landslide events, shallow landslide / bog-burst records, complex groundwater and geology, dense drainage pathways and protected downstream waters.

This is directly relevant to the community because a peat slide, bog burst or construction-related slope failure would not remain within the applicant's red-line boundary. Peat, silt, sediment, hydrocarbons or cementitious material could move rapidly into watercourses and downstream towards the Straduffy River, County River, Lattone River and Lough Melvin catchment, with wider concerns for Lough Gill and Lough MacNea.

The GSI/EPA mapping supports the local photographic evidence of bog slippage, exposed peat, steep slopes, watercourses, swallow holes and upland drainage. These are not theoretical risks. They are recorded and visible features of the landscape. The Board should not accept an approach where mapped landslide, peat, groundwater and water-quality risks are reduced to construction-management promises.

The correct planning question is whether this upland peat, karst and water-source landscape is suitable in principle for a development of this scale. Kiltyclogher Community Council submits that it is not.

26. NHA Bog, Forestry and the Risk of Downstream Transport

The individual objection also identifies the importance of the Dough Mountain / Thur Mountain NHA bog and its relationship with the proposed wind farm forestry. The community is concerned that the upland bog, forestry slopes, steep ground and receiving rivers are being assessed too narrowly.

The proposed wind farm would not be built on an isolated, flat or dry industrial site. It would be inserted below and around upland bog and forestry on sloping ground. Local evidence shows steep watercourses, rapid runoff routes, bog slippage and vulnerable peat. If peat movement, sediment release or pollution occurs, the material may be transported downhill through watercourses towards sensitive receiving waters.

This risk is especially important for Kiltyclogher because the village, its tourism economy, angling, river walks, water quality, public health and downstream reputation depend on clean water and a stable upland environment.

27. Grid Capacity, EirGrid Route Constraints and Incomplete Assessment

Kiltyclogher Community Council also adopts the grid-capacity and route-constraint concern raised in the individual objection. A wind farm of this scale cannot operate without a secure and lawful grid connection. The grid connection is therefore not optional infrastructure; it is an essential part of the development.

The public is being asked to assess the wind farm while the grid connection and wider electricity export implications are being dealt with separately. This makes the application premature and incomplete from a community perspective. It also makes it more difficult for ordinary residents to understand the full project and its cumulative effects.

EirGrid's Powering Up the North West material is relevant because it identifies the need to strengthen the North West grid and recognises route constraints including people, landscape, cultural heritage and environmental sensitivities. EirGrid seeks to avoid towns, villages, houses and environmentally sensitive areas such as woodlands and bogs when routing grid infrastructure.

That principle should apply with even greater force to the wind farm itself. If woodlands and bogs are recognised as constraints for a grid route, the same type of upland woodland, bog, peat and water environment should not be treated as suitable for fourteen 185 metre turbines, a permanent mast, borrow pits, access roads, hardstands, drainage works and cable trenches.

The wind farm, grid connection, route options, turbine delivery works, road works and design flexibility option must be assessed together as one complete project.

28. Previous 100 Metre Mast Application and Current Permanent Mast Proposal

The Community Council also wishes to record the relevance of the earlier temporary 100 metre meteorological mast application. That application was refused following concerns and further information issues. The current application now includes a permanent 100 metre mast at a different location as part of a much larger industrial wind farm proposal.

This planning history is relevant because it shows that the site has already raised concerns even at mast stage. A temporary mast is a much smaller intervention than fourteen turbines, extensive roads,

borrow pits, cabling, hardstands, drainage works and a permanent mast. The refusal history and change in mast proposal should therefore be treated as part of the overall planning context, not ignored.

The Board should not permit the current proposal to use a larger permanent mast and wider infrastructure package to bypass concerns that arose in the earlier temporary mast process.

29. Local Photographic Evidence

Kiltyclogher Community Council relies on local photographic evidence showing the landscape, habitats, wildlife, heritage, tourism assets, water features, peatland, karst features, community facilities and natural amenities that would be affected by the proposed development.

The photographs inserted throughout this submission should be read together with the written submission. They demonstrate that the proposed development would affect a living community landscape, not an empty upland or isolated commercial forestry site.

The photographs show village views towards Dough Mountain, the approved tourism development setting, Kiltyclogher Heritage Centre, Saddle Hill and recorded monument areas, Tullyskeherney Court Tomb, cave and karst features, swallow holes, upland peat and blanket bog, steep slopes and watercourses, Thur Mountain river walk, protected raptor habitat, Irish Hare habitat and cumulative pressure from the existing Faughery Wind Farm.

These photographs support the submission that the area is a connected ecological, hydrological, scenic, cultural and tourism landscape. They also demonstrate that the EIAR should have given greater weight to local knowledge, community evidence, wildlife records, landscape value, karst and groundwater concerns, peat instability, flood pathways, heritage tourism and the wider tourism economy of Kiltyclogher.

Photograph Index

No.	Photograph caption	Relevant section / issue
1	View of Dough Mountain from the Catholic Church in Kiltyclogher	Landscape and visual impact / community setting
2	View of Dough Mountain from the proposed caravan parking area behind Kiltyclogher Holiday Centre	Approved tourism development / landscape setting
3	Kiltyclogher Heritage Centre	Heritage tourism and community facilities
4	Saddle Hill	Recorded monuments and prehistoric landscape setting
5	Area of recorded monuments LE008-005 and LE008-006002 on Saddle Hill, Shasmore	Recorded archaeological monuments
6	Tullyskeherney Court Tomb / National Monument area	Wider Neolithic and prehistoric landscape
7	Cave / karst feature near Tullyskeherney Tomb	Karst, cave and geological heritage
8	Swallow hole on slopes of Dough Mountain showing water flow into ground	Karst, underground drainage and hydrology
9	Upland peat and blanket bog habitat at summit of Dough Mountain, approximately 465 metres above sea level	Peatland, carbon storage and blanket bog habitat
10	Steep slopes and watercourses on Dough Mountain	Peat stability, slope instability and water pathways
11	Thur Mountain river walk connecting	River walks, water heritage and

	Kiltyclogher to Lough Melvin	tourism
12	Female Hen Harrier / raptor habitat in the wider Dough Mountain landscape	Protected raptor activity and wildlife heritage
13	Irish Hare on Lissinagroagh Wind Farm site	Wildlife and habitat
14	Faughery Wind Farm from summit of Dough Mountain	Cumulative landscape impact with existing wind energy development

30. Conclusion

Kiltyclogher Community Council respectfully requests that An Coimisiún Pleanála refuse permission for the proposed Lissinagroagh Wind Farm, PAX Reference Number PAX12.324290, Planning Application Number ACP-323048-25, the associated Grid Connection, Planning Application Number ACP-323353-25, and the Design Flexibility Option, Application Number ACP-323910-25.

The proposed development would cause serious and lasting harm to Kiltyclogher and the wider North Leitrim uplands. It would damage the village's landscape setting, undermine community-led tourism, threaten future recreational plans, create unacceptable hydrological and peatland risks, and industrialise a sensitive rural environment.

This harm is especially serious because Kiltyclogher is not merely hoping to develop tourism at some unknown future date. The community has already secured planning approval and major grant funding for a campervan and tent site beside the Community Centre, with construction due to begin shortly. The Community Council has also secured grant funding for the extension of the playground and the improvement of the Fair Green, with works due to commence later this year. These projects are supported by public investment and by local, county and tourism development objectives. The EIAR's failure to properly assess the impact of the proposed wind farm on these approved and funded projects is a fundamental defect.

The proposed development would also undermine Kiltyclogher's hard-won progress in reversing depopulation through the nationally recognised Kilty Live campaign, which has attracted new families, new nationalities, cultural integration, crafts and music into the village since 2017.

Kiltyclogher's future depends on the health of its landscape, water, wildlife, heritage and local economy. The proposed wind farm is incompatible with that future.

The Community Council also relies on the relevant points from Joseph Sheerin's individual objection regarding unsuitability in principle, GSI and EPA mapping, NHA bog and downstream water pathways, grid capacity and route constraints, the earlier 100 metre mast refusal, and the need to assess the wind farm, grid connection and design flexibility option as one complete project.

This objection is not opposition to climate action. It is an objection to placing an industrial wind farm of this scale on sensitive upland bogland in a location where it would damage carbon-rich peat, water systems, protected habitats, rural amenity, tourism, angling, wildlife, public health and community development.

The long-term ecological, economic, social, hydrological, public health and transboundary risks far outweigh any claimed benefit of the project.

For the reasons set out above, Kiltyclogher Community Council asks An Coimisiún Pleanála to uphold the principles of sustainable development, protect Kiltyclogher's right to a viable rural future, and refuse permission.

Please find enclosed the statutory observation fee of €100.

We request written acknowledgement of this submission and ask to be kept informed of the Inspector's Report, any further information, and any oral hearing dates.

Yours faithfully,

Signed: Thomas Dillon

Chairperson

For and on behalf of **Kiltyclogher Community Council**

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