



Tourism Network

Leitrim Village, Carrick on Shannon, , Co. Leitrim, Ireland

Submission on behalf of Leitrim Tourism Network. 4th July 2026

Re: Proposed Lissinagroagh / Dough Mountain Wind Farm – An Coimisiún Pleanála Reference PAX12.324290

Dear Sir/Madam,

I make this submission in my capacity as Secretary of Leitrim Tourism Network, objecting to the proposed Lissinagroagh / Dough Mountain Wind Farm.

Leitrim Tourism Network is a business-led and voluntary network representing and connecting local tourism providers, accommodation operators, food businesses, outdoor recreation providers, cultural and heritage interests, festivals, community tourism projects and small local enterprises across County Leitrim.

This submission is not made in opposition to renewable energy. Leitrim Tourism Network recognises the need for climate action and supports Ireland's transition away from fossil fuels. We support renewable energy, retrofitting, energy efficiency, rooftop solar, community energy, storage, bog restoration and properly planned offshore wind.

However, support for renewable energy does not mean that every renewable energy project, in every location and at every scale, should be accepted. The question is whether this particular development, in this particular landscape, is appropriate. In our submission, it is not.

The proposed development would place fourteen large turbines, with blade tip heights of up to approximately 180–185 metres, on a sensitive upland landscape at Dough Mountain. It would involve turbine bases, crane hardstands, access roads, borrow pits, drainage, underground cabling, turbine delivery works, biodiversity enhancement lands and associated infrastructure. This is industrial-scale development in a landscape whose value lies in its openness, scenic quality, quietness and sense of place.

Leitrim Tourism Network respectfully requests that An Coimisiún Pleanála refuse permission.

1. Landscape is not a backdrop; it is Leitrim's tourism product

In many counties, tourism is centred on a large resort, a famous monument or a major urban centre. Leitrim is different. Leitrim's tourism is built around the whole character of the place: lakes, rivers, mountains, bogs, villages, music, culture, food, green roads, quiet lanes, walking, cycling, angling, festivals and a strong sense of community.

Visitors come to Leitrim because it feels different. They come for space, calm, scenery, outdoor life, clean air and a slower pace. They come because Leitrim has not become everywhere else.

Dough Mountain and the surrounding uplands form part of the wider scenic setting of Manorhamilton and the North Leitrim Glens. This is not an anonymous landscape. It is part of the identity of North Leitrim and part of what makes the area attractive to residents and visitors.

Turbines of up to 185 metres would not sit quietly in this landscape. They would dominate the skyline and alter the experience of the area over a wide distance. The effect would not be limited to the turbine sites. It would be experienced from roads, walks, lanes, homes, farms, villages, scenic approaches and recreational routes.

Once a landscape of this type is industrialised at this scale, it cannot simply be restored to its former character. That is a long-term tourism and amenity issue.



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2. The proposed development conflicts with Leitrim's emerging tourism strategy

Leitrim Tourism Network has been involved in discussions around a wider tourism positioning for Leitrim within the Atlantic Northwest: Ireland's Wild Borderlands. That framework sees Leitrim not as a peripheral county, but as a creative, musical and natural core of a wider region including Leitrim, Sligo, Donegal, Cavan and Fermanagh.

The strategic idea is simple: Leitrim's landscape and culture are extraordinary but underrepresented. The county should be promoted more strongly as a place of natural beauty, creativity, music, heritage, outdoor recreation, festivals, small businesses and community tourism.

That strategy depends on protecting what makes Leitrim distinctive. It depends on landscape, water, quiet roads, authentic towns and villages, events, arts, crafts, music and nature-based experiences. It also depends on confidence among tourism businesses that public policy will protect the assets they are being asked to promote.

The proposed wind farm would move in the opposite direction. It would industrialise a sensitive upland landscape at a time when Leitrim is trying to present itself as a high-quality, nature-rich and culturally distinctive destination.

Leitrim should not undermine its own tourism brand by permitting development that damages the very landscape and sense of place on which that brand depends.

3. Tourism depends on tranquillity, not only scenery

Tourism impact is not only about whether turbines can be seen. It is also about how a place feels.

Dough Mountain and the surrounding uplands offer quietness, openness, dark skies, rural character, fresh air, walking, cycling and the sense of being away from industrial development. These qualities are hard to quantify, but they are exactly why many people visit and return to North Leitrim.

The proposed development would change that experience. During construction there would be heavy traffic, abnormal loads, road works, dust, noise, signage and disruption. During operation there would be turbines, hardstand areas, access roads, maintenance traffic, aviation lighting and an altered skyline.

A landscape can lose its tourism value without being destroyed completely. It is enough that its quietness, wildness and sense of place are diminished.

4. Walking, cycling, green roads and outdoor recreation

Leitrim has worked hard to promote walking, cycling, greenways and outdoor recreation. These are central to the county's future, not side issues.

Quiet roads and green lanes are part of the visitor experience. They are used by walkers, cyclists, farmers, dog walkers, local families and visitors. They connect people with the landscape in a way that formal attractions cannot.

The proposed construction programme, turbine delivery works, road strengthening, traffic management and long-term access infrastructure would affect more than the turbine locations. It would affect how the wider area is used and experienced.

A quiet upland lane, once widened, engineered or altered for industrial access, may never feel the same again. That loss should be given real weight.



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5. Impact on small businesses and the visitor economy

Tourism in Leitrim is made up mainly of small businesses and community effort. It supports guesthouses, self-catering accommodation, B&Bs, cafés, restaurants, pubs, guides, artists, craft workers, food producers, festivals, outdoor activity providers, local shops and voluntary groups.

These businesses depend on reputation, repeat visitors, word of mouth and the quality of the surrounding environment. They do not have the scale of larger tourism centres. They are vulnerable to anything that weakens the county's appeal.

It is not enough to say that wind farms may bring rates or community benefit funds. Those benefits, even if real, do not replace the long-term economic value of an unspoiled landscape.

A county should not damage the tourism product it is trying to build in order to gain income from the development that causes the damage.

6. Peatland, water and ecology are tourism issues too

This is not only a visual-impact case. Peatland, hydrology, water quality and ecology are also tourism issues.

Leitrim's appeal is closely linked to clean water, healthy bogs, rivers, lakes, wildlife, open uplands and a living rural landscape. Angling, walking, cycling, nature tourism, photography, education, wellness tourism and general visitor enjoyment all depend on environmental quality.

The applicant's own documents identify ecological and hydrological constraints. These include peatland habitats, protected species such as hen harrier, bats, marsh fritillary butterfly and otter, and hydrological connectivity to protected European sites including Lough Gill SAC and Lough Melvin SAC.

That means this is not a low-sensitivity site. The applicant proposes to address these issues through mitigation, compensation, enhancement, translocation, curtailment, monitoring and adaptive management. In plain English, the applicant is not saying there is no risk. The applicant is saying the risk can be managed.

In our submission, that is not enough for a landscape and environment of this sensitivity.

7. Protected species and habitat compensation

Leitrim Tourism Network is not an ecological expert body, but protected species and habitats are clearly relevant to the tourism and amenity value of the area.

The applicant's documents identify hen harrier concerns, including likely significant pre-mitigation effects relating to displacement from nesting and foraging habitat. The proposed response includes nesting and foraging enhancement lands, monitoring and long-term management.

The bat assessment records multiple bat species, bat activity at or near turbine locations, and turbines identified as High Risk and Medium Risk. The proposed response includes buffers, curtailment, monitoring and adaptive management.

Marsh fritillary butterfly is also identified. The proposed response includes avoidance of known larval webs, possible translocation if webs are found during construction, wet grassland management, monitoring and remedial action.

These are not minor matters. They show that the proposed wind farm is being placed in a living and sensitive ecological landscape.

The Board should be cautious about measures that amount to ecological compensation rather than true avoidance. Creating, enhancing or managing habitat elsewhere is not the same as avoiding harm to an established habitat in the first place. Monitoring may show later that damage has occurred, but it does not prove now that damage will not occur.

8. The grid connection and the proposed 10-year permission

There is also a serious concern about the structure of the application.

The proposed wind farm cannot operate without a grid connection. The applicant's own material indicates that the wind farm and grid connection are functionally interdependent and constitute a single project, yet the grid connection and substation are to be dealt with separately.

That is not satisfactory from a public-participation, tourism or cumulative-assessment point of view.

The grid connection is not a minor detail. It is essential infrastructure. It would involve a significant route, public roads, townlands, crossings, ducting and environmental considerations. The public should not be asked to assess the wind farm now and deal with the grid connection later.

If the wind farm and grid connection form one project in practical terms, they should be assessed together in planning and environmental terms.

The proposed 10-year permission period is also a concern. A 10-year permission would leave this landscape, and the communities and businesses around it, in prolonged uncertainty while the developer seeks to assemble the remaining grid and infrastructure elements. That uncertainty is damaging to local confidence and tourism investment.

9. Renewable energy is already being wasted

Ireland needs renewable energy, but the answer is not simply to build more turbines in more sensitive landscapes.

A major issue is that Ireland is already wasting renewable electricity because the grid and storage systems cannot always take it when it is available. That should change the national conversation.

If clean electricity is already being dispatched down, then the priority should be to strengthen the grid, invest in storage, develop demand flexibility, support community energy and make better use of the renewable energy already being produced.

It is difficult to justify the industrialisation of sensitive upland peatland while the existing system is still wasting clean power.

10. Better alternatives: offshore wind, rooftop solar, storage and community energy

Leitrim Tourism Network supports renewable energy, but the State should prioritise better alternatives where they cause less harm to sensitive inland landscapes.

Ireland's greatest renewable-energy opportunity is offshore wind, particularly along the Atlantic seaboard. Offshore wind can be developed at scale, support energy exports, create port-based employment and reduce the pressure to industrialise sensitive upland peatlands.

There is also enormous untapped potential in rooftop and built-environment solar. Farm buildings, schools, public buildings, commercial roofs, community halls, car parks, industrial buildings and large domestic roofs should all be used far more effectively.



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Energy efficiency, retrofitting, storage, smart charging, community energy and bog restoration should also be treated as central parts of climate action.

Leitrim could be a model of ecological rural living. It should not be treated as a soft target for industrial-scale wind development.

11. This is not an anti-renewable submission

For the avoidance of doubt, this submission is not anti-renewable.

It is pro-renewable energy in the right place, at the right scale, with proper environmental safeguards and proper regard for landscape, ecology, water, tourism and community wellbeing.

The choice is not between climate action and landscape protection. A proper national strategy should do both.

A renewable-energy project that damages a sensitive upland peatland landscape, creates unresolved ecological and hydrological risk, affects protected species, undermines tourism and leaves the grid connection to a later application is not a no-regrets climate solution.

12. Conclusion

Leitrim Tourism Network respectfully requests that permission be refused.

The proposed development would be excessive in scale and inappropriate in location. It would industrialise a sensitive upland landscape that is important to the identity, amenity, tourism potential and long-term sustainable development of North Leitrim.

It would affect the very qualities that Leitrim depends on: scenery, tranquillity, clean water, clean air, biodiversity, quiet roads, outdoor recreation, local distinctiveness and a sense of place.

The applicant's own documents identify serious ecological and hydrological constraints and then rely on mitigation, compensation, translocation, curtailment, monitoring and adaptive management. That does not remove reasonable scientific doubt.

The wind farm and grid connection are functionally interdependent, yet the grid connection is not before the public as part of the present application. The proposed 10-year permission period would also leave the area in prolonged uncertainty.

Leitrim should be promoted and protected as a county of landscape, water, culture, outdoor life, sustainable tourism, greenways, community enterprise and ecological living. This development would move the county in the wrong direction.

For all of the above reasons, Leitrim Tourism Network respectfully requests that permission be refused.

Yours faithfully,

Conor Maguire

Secretary

Leitrim Tourism Network