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An Coimisiún Pleanála
64 Marlborough Street
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10 July 2026

Re: Submission on the Proposed Lissinagroagh Wind Farm, County Leitrim
Case Reference: PAX12.324290

Dear Sir/Madam,

Please see below my submission in relation to the above Strategic Infrastructure Development planning application for Lissinagroagh Wind Farm, County Leitrim. I am making this submission as a member of a family who own and reside at properties within the vicinity of the proposed development. My submission relates to the effects of the proposed development on my family home, family-owned lands and the surrounding landscape. I firmly believe that this proposal is wholly inappropriate for the area based on my review of the application, supporting documents, and Leitrim County Council's own policies and objectives.

1. Setback

The applicant places significant reliance on compliance with minimum setback distances, stating that the proposed layout has been designed so that the nearest residential curtilage is approximately 740 metres from the nearest turbine, with the nearest borrow pit approximately 550 metres away. It concludes that these separation distances reduce the potential for significant effects on residential amenity.

Compliance with setback guidance does not automatically demonstrate that the effect on the residential amenity of nearby family homes is acceptable, particularly where turbines of up to 185 metres would become a dominant feature in the surrounding landscape. The application itself acknowledges that residential amenity extends beyond physical separation distances and includes factors such as peace, tranquillity, setting and local character. For nearby residents, particularly those whose homes and land are in close proximity to the proposed development, the planning assessment should consider whether 14 turbines of up to 185 metres can be accommodated without resulting in unacceptable effects on the residential environment. The application does not satisfactorily demonstrate that these wider aspects of residential amenity have been protected.

2. Scale of the Development

The application proposes **14 wind turbines** with a maximum blade tip height of **185 metres**, together with access tracks, crane hardstands, borrow pits, a substation, a Battery Energy Storage System and associated infrastructure. The operational life of the development is stated to be **35 years.** The

proposed development extends across approximately **389 hectares.** While this is below the 5 km² threshold referred to in the Leitrim Renewable Energy Strategy for commercially scaled wind farm developments, it nevertheless represents a **substantial industrial infrastructure development** within a small rural townland. The scale of the proposal should therefore be considered not only in terms of the turbine locations but also the extent of the associated infrastructure required to construct and operate the wind farm. A development of this scale represents a significant and long-term alteration to the receiving landscape.

The Planning Statement describes wind turbines as having a "relatively small footprint". While this may be true when considering the turbine foundations alone, it does not reflect the overall scale of the proposed development. The application includes extensive ancillary works, including new and upgraded access tracks, crane hardstands, borrow pits, a substation, battery energy storage system, underground cabling, construction compounds and significant works to the public road network. These elements form an integral part of the development and should be considered when assessing its overall environmental and landscape impact. The Design Statement also confirms that the delivery of turbine components requires a **122 km delivery route**, with minor accommodation works proposed at **57 locations** to facilitate the transport of oversized components.While described as "minor" by the applicant, these works demonstrate the significant scale of the engineering intervention required to deliver and construct the development. The application also proposes permanent works to sections of the local road network, including the L61801 in the townland of Faughary, a narrow rural road that provides the only means of access for a number of local residents. Although these works are presented as necessary to facilitate construction, they illustrate the extent to which existing rural infrastructure must be modified to accommodate the development.

The Planning Statement sets out the national and regional need for renewable energy generation, however, the existence of that need does not remove the requirement to demonstrate that this particular development is appropriate in this particular location. The planning assessment must consider whether the environmental, landscape and residential impacts identified throughout the application are acceptable, having regard to the policies and objectives of the Leitrim County Development Plan. The evidence presented does not justify the scale of development proposed within this sensitive rural landscape, nor does it demonstrate compliance with the relevant landscape and residential amenity policies of the Leitrim County Development Plan.

3. Turbines T10 & T12

The Planning Statement acknowledges that Turbines T10 and T12 are located **outside the areas identified as "Available Areas"** for new wind farm development within the Leitrim Renewable Energy Strategy. The Design Statement seeks to justify this departure by stating that mapped landscape designations do not reflect the gradual transition of landscape character on the ground. It argues that the landscape surrounding T10 and T12 shares the same upland, working landscape characteristics as the adjoining Available Area, however, the application **does not provide any separate landscape analysis** to support this conclusion. The mapped boundaries represent a considered planning judgement rather than arbitrary lines on a map. The justification provided for T10 and T12 effectively asks the Planning Authority to set aside the mapped outcome of that strategic assessment in favour of a site-specific interpretation of landscape character. The application does not demonstrate why these two turbines cannot be accommodated within the designated Available Area, nor does it provide sufficient justification for extending the development beyond the area identified by the Council's adopted Renewable Energy Strategy. Given that the applicant has acknowledged that T10 and T12 lie outside the mapped Available Area, I do not consider that the reasoning presented is sufficient to justify their inclusion in the proposed development.

4. **Magnitude of Visual Effects**

The LVIA states that wind turbines do not represent significant physical bulk and that their impacts arise primarily through visual intrusion rather than physical obstruction. It also notes that a strong visual presence does not necessarily equate to an adverse visual effect. In support of this position, the applicant refers to Fáilte Ireland studies which found that many visitors did not consider wind farms to detract from their sightseeing experience and, in some cases, viewed them positively. While these studies may be relevant when considering tourism and public viewpoints, they are of limited assistance when assessing residential visual amenity. The experience of a visitor viewing a landscape for a short period is fundamentally different from that of a resident who experiences the same landscape every day over the proposed 35-year operational life of the development, and beyond.

5. **Visual Effects to Residents**

The Landscape and Visual Impact Assessment (LVIA) concludes that, following the implementation of mitigation measures, the proposed development would result in no significant residual landscape or visual effects overall. At the same time, the assessment acknowledges that some nearby viewpoints and receptors would experience moderate to substantial visual effects, and that the proposed turbines would have a prominent visual presence from a number of locations. It also identifies residents as among the most sensitive visual receptors because they experience changes to the landscape on a permanent basis. The application does not clearly explain how these acknowledged local effects have been balanced against the overall conclusion, particularly where the receptors concerned include permanent residents. The conclusion of "**overall not significant" does not fully reflect the experience of people living in the area every day.**

The LVIA explains that landscape sensitivity, visual sensitivity and the significance of effects are determined using professional judgement. Conclusions such as "Not Significant" are not objective measurements but professional opinions reached by the applicant's own landscape consultants.

Finally, while the application assesses landscape, visual effects, noise, shadow flicker and other environmental topics in separate technical chapters, residents experience these effects together. The planning assessment should therefore consider the combined effect of landscape change, turbine movement, operational noise, construction activity and associated infrastructure over the lifetime of the development, rather than relying solely on the conclusions of individual technical assessments considered in isolation.

6. **Area of High Visual Amenity (AHVA)**

The applicant acknowledges that much of the proposed development is located within the **Dough Mountain Area of High Visual Amenity (AHVA).** The Landscape and Visual Impact Assessment describes this area as being recognised for its upland character, extensive views, tranquillity and scenic quality. The Leitrim County Development Plan and the accompanying Landscape Designations Study identify Areas of High Visual Amenity because of these landscape qualities and recognise the importance of protecting their visual character. The Planning and Development Acts and the Leitrim County Development Plan require renewable energy proposals to achieve an **appropriate balance** between climate objectives and the protection of landscape character, visual quality and residential amenity. The application demonstrates the engineering feasibility of the proposal more convincingly than it demonstrates that this balance has been achieved. While the LVIA concludes that the residual landscape and visual effects are "Not Significant", I was unable to identify a clear explanation of how fourteen turbines of 185 metres in height would preserve the landscape qualities for which the Dough Mountain Area of High Visual Amenity has been designated. Similarly, the application does not demonstrate how the proposal is consistent with the objectives of the Leitrim County Landscape and Visual Capacity Study. The Council's own documents identify landscape sensitivity, skyline character,

visual prominence and Areas of High Visual Amenity as key factors in determining the capacity of a landscape to accommodate wind energy development.

7. **Selection of Viewpoints**

The application states that the viewpoints were selected following consultation and are intended to represent a range of receptor types, including residents, roads, walking routes and publicly accessible locations. Given that the overall conclusions of the LVIA are based on these representative viewpoints, it should be clear why those viewpoints were selected, how they represent nearby residential areas, and whether they reflect the views likely to be experienced by residents on a daily basis.

8. **Landscape Sensitivity**

The application site is located within **Landscape Character Area (LCA) 4 – Arroo Mountain and Outliers** and the **B3 Dough Mountain Area of High Visual Amenity (AHVA).** The LVIA acknowledges both designations and recognises this as a landscape of notable scenic and visual value. The LCC Leitrim County Landscape Character Assessment describes this upland landscape as remote, wild and visually open, with distinctive mountain skylines, panoramic views and a recognised scenic quality. It identifies these upland areas as being **particularly sensitive to change** because of their skylines, visual openness and wilderness characteristics, and notes that they are **sensitive to development which would interfere with important skyline views.** The LCC Landscape and Visual Capacity Study reaches similar conclusions. It identifies the Dough Mountain ridgeline as an **important backdrop** to the surrounding valleys and highlights scenic quality, panoramic views, skyline character and landscape sensitivity as key factors in determining the capacity of an area to accommodate wind energy development. The applicant acknowledges the presence of the **existing Faughary Wind Farm** and commercial forestry as part of the existing landscape context and concludes that the proposed turbines can be accommodated within what is described as a broad and robust upland landscape with no significant residual landscape effects. However, the Landscape and Visual Capacity Study makes clear that the presence of existing development is only one factor in assessing landscape capacity. It continues to identify the mountain skylines, panoramic views and scenic quality of the Dough Mountain area as defining characteristics of the landscape. The application does not adequately explain how the addition of fourteen turbines with a blade tip height of 185 metres, alongside the existing **significantly smaller** Faughary Wind Farm with its three turbines of approximately 119 metres, remains consistent with the landscape capacity identified by the Council's own evidence base.

9. **Landscape Policies**

The Leitrim County Development Plan contains specific policies to protect Areas of High Visual Amenity.

LD POL 2 seeks to protect Areas of High Visual Amenity from inappropriate development and to reinforce their character, distinctiveness and sense of place. **LD POL 3** states that development within an Area of High Visual Amenity should only be permitted where the applicant has demonstrated a **very high standard** of site selection, site layout and design, and where the Planning Authority is satisfied that the development could not be accommodated in a less sensitive location. I do not believe how a development of this excessive scale and sprawl preserves the character, distinctiveness and sense of place of this Area of High Visual Amenity, or why this development could not be accommodated in a less sensitive location, as required by **LD POL 3.**

10. Relevant Leitrim County Council Documents

The following extracts are taken directly from Leitrim County Council's adopted planning documents. They form part of the policy and evidence base against which this application should be assessed.

Leitrim County Development Plan 2023–2029 – Volume I - Section 12.6.2 – Wind Energy

"*To supplement and inform the RES, a robust Landscape and Visual Capacity Study was undertaken to specifically evaluate the respective capacities of various landscapes in the county to potentially accommodate larger scale wind energy development proposals. The capacity study concludes that* ***there is very limited capacity to absorb future large scale proposed developments*** *in the form of multiple wind turbines and wind farms.*

This is due to a number of factors relating to landscape quality and scenic quality as follows:

- *Scenic quality and expansive nature of these landscapes;*
- *Remote, tranquil and wild quality where the absence of man-made influences is a key characteristic;*
- *Intervisibility and relationship with adjacent landscapes for which the uplands are important to setting and present as a distinctive skyline or mountain backdrop;*
- *Presence of complex, distinctive and rugged landform;*
- *Landscape scale, at locations where field patterns defined by hedgerows convey a sense of a small-scale landscape in which the presence or visibility of wind turbines would dominate; and*
- *Proximity of settlements for which upland moorland and mountain areas are an important setting, which would be adversely affected by future wind turbines or wind farms.*

The capacity study concludes that although scope for future wind energy development would be limited, each planning application... would have to demonstrate that the design of the proposed development, in terms of turbine number, hub height, tip height and siting of individual wind turbines has regard for the baseline landscape character and visual amenity of the study area in which the development would be located."

This is one of the key policy statements in the County Development Plan. It acknowledges that future wind energy development may be possible, but only where the applicant demonstrates that the number of turbines, their height and siting have proper regard for the existing landscape character and visual amenity.

County Leitrim Landscape Character Assessment - Section 6.4.6.3 – Landscape Quality, Condition and Sensitivity

"*The landscape is valued as recognised in the County Designations and the valued and sensitive attributes documented above. 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. These landscapes present as distinctive skylines and landmarks viewed from much of the surrounding lowlands.They are sensitive to changes which would interfere with important unique skyline views available from the lowlands.*"

The Landscape Character Assessment identifies the very qualities that make this landscape sensitive to change. These are the characteristics that should be protected and considered when assessing whether fourteen turbines of up to 185 metres can be accommodated within this landscape.

County Leitrim Landscape Designations - Section 4.6 – B3 Dough Mountain Area of High Visual Amenity

"*The summit of the mountain presents an important scenic skyline as backdrop to the surrounding valleys. The visual openness of this landscape facilitates long range dramatic views towards adjacent mountain ranges. The landscape is rural and remote with high levels of tranquillity away from roads.* ***The presence of wind turbines are detracting elements which undermine the scenic quality*** *as purpose of the designation. The boundary of the AHVA remains in recognition of the skyline of the mountain summit which is* ***deserving of protection****.*"

The Council's own Landscape Designations Study expressly identifies existing wind turbines as detracting elements that undermine the scenic quality of the Area of High Visual Amenity. At the same time, it confirms that the designation remains in place because the skyline of Dough Mountain is considered deserving of protection. These findings are directly relevant to the assessment of the proposed development.

Leitrim Landscape and Visual Capacity Study for Wind Farms and Wind Turbines - Section 3.1.3 – LCA 4 Arroo and Mountain Outliers

"*The LCA overall is of some considerable scenic quality and would be* ***highly sensitive to wind turbines****. Some limited moorland areas in the vicinity of Dough Mountain and Saddle Hill may be considered subject to detailed design, having regard for landscape and visual constraints including potential cumulative effects with other wind turbines.*"

The Capacity Study does not conclude that the landscape is suitable for large-scale wind energy development. Instead, it describes the landscape as **highly sensitive to wind turbines** and states that only **some limited moorland areas** may be considered, subject to careful design and assessment. This reinforces the decision that this location is inappropriate for the proposed development.

For the reasons set out above, I do not consider that the applicant has demonstrated that the proposed development is appropriate for this location or that it complies with the relevant landscape and visual policies of the Leitrim County Development Plan. Having regard to the issues raised above, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Yours sincerely,

Lisa Fox
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