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Submission / Observation

Proposed Lissinagroagh Wind Farm

Planning Reference: PAX12.324290

Location: Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherney, Co Leitrim

Current Wind Farm Application: ACP-323048-25

Design Flexibility / 10-Year Permission: ACP-323910-25

Grid Connection: ACP-323353-25 - separate application but directly related

Date: 7 July 2026

To: An Coimisiun Pleanala / An Bord Pleanala

Request: Refusal of Permission

Main Planning Application Number	**PAX12.324290**
Wind Farm Application Reference	**ACP-323048-25**
Grid Connection Reference	**ACP-323353-25**
Design Flexibility Option Reference	**ACP-323910-25**
Observer	Marie Sheerin

Important: all related planning references are included above and repeated in the first paragraph and final refusal request, including the current wind farm application, the design flexibility / 10-year permission reference, and the separate grid connection reference.

This observation objects to the proposed wind farm because the site is unsuitable in principle due to upland blanket bog, peat instability risk, karst hydrology, steep slopes, high rainfall and sensitive watercourses connected to Lough Melvin SAC.

The objection also raises concerns regarding Hen Harrier and other protected species, Dough Mountain NHA, Kiltyclogher village, tourism, heritage, caving, public consultation, project splitting, the separate grid connection, the EirGrid Powering Up the North West route constraints, the former temporary 100 m mast application and current permanent mast proposal, and cumulative impact with Faughery Wind Farm.

Formal Objection

I wish to make a formal objection to the proposed Lissinagroagh Wind Farm, Main Planning Application Number PAX12.324290, including the associated Wind Farm Application Reference ACP-323048-25, Design Flexibility and 10-Year Permission Reference ACP-323910-25, and the separate Grid Connection Reference ACP-323353-25. Although the grid connection is being treated as a separate application, I submit that it is essential associated infrastructure and must be considered when assessing the overall environmental effects of the project.

I am involved locally in protecting Dough Mountain, the upland habitats, peatlands, protected wildlife, watercourses and the wider community of Kiltyclogher. I am also involved with Kiltyclogher Heritage Centre and with local heritage and environmental work in the area.

My objection is not based on minor concerns that could be resolved by planning conditions. My position is that Dough Mountain, Thur Mountain, Saddle Hill and the surrounding upland blanket bog, karst, forestry, watercourses, habitats, heritage features and community landscape are unsuitable in principle for a wind farm of this scale. I do not accept that reducing the number of turbines makes this development acceptable. Faughery Wind Farm has already caused major landscape and upland habitat change in this area, and further wind farm development would compound that impact.

The proposed development should be refused.

1. Overall Grounds of Objection

The proposed wind farm would place fourteen turbines of up to 185 metres tip height, together with new roads, borrow pits, compounds, drainage works and forestry clearance, on a sensitive upland landscape connected to Dough Mountain, Thur Mountain, Saddle Hill, Kiltyclogher, the Sraduffy River, the County River, the Lattone River and Lough Melvin SAC.

The application is fundamentally deficient because it separates the wind farm from the grid connection and from wider grid and turbine delivery impacts. The public is being asked to assess the main wind farm without full information on the grid route, connection works, cumulative impacts, turbine delivery route, road works, water risks, habitat loss and effects on households and communities along the full project.

The development would affect: upland blanket bog and peatland; karst hydrology, underground water, groundwater, springs, swallow holes, caves and hidden drainage pathways; the Lattone River, the County River, Dooard River SAC, Sraduffy River, Lough Melvin SAC, Owenmore River, Lough Gill SAC, Glenfarne River and Lough MacNean; Hen Harrier, Curlew, Ring Ouzel, raptors, bats, Marsh Fritillary, White-clawed Crayfish and other protected species; Dough Mountain NHA and the wider ecological network; Kiltyclogher village, tourism, heritage, walking, river walks, caving and community development; local farming, private water supplies, fisheries and downstream water quality; landscape, visual amenity, shadow flicker, noise and aviation safety; public participation, cross-border consultation and trust in the planning process.

Photograph: View from Dough Mountain showing the proposed T7 to T12 turbine locations and the cave/karst context. This supports the objection that the turbine layout is located within a connected upland, karst, water and habitat landscape.

The EIAR and NIS do not, in my view, provide the certainty required for a project of this scale in this location.

2. Project Splitting, Grid Connection and Incomplete Assessment

The main planning application is identified as PAX12.324290. The associated references include ACP-323048-25 for the wind farm application, ACP-323353-25 for the grid connection and ACP-323910-25 for the design flexibility option. These related references create serious difficulty for the public and for proper environmental assessment because the wind farm, grid connection and design flexibility option are being considered through separate processes rather than as one complete project.

A wind farm cannot operate without a grid connection. The grid connection is not a side issue; it is an essential part of the project. It may involve trenching, road opening, ducting, crossing watercourses, removing hedgerows, affecting households, disturbing habitats and creating cumulative impacts with the wind farm itself. It may also require wider grid upgrades, especially given information that the North West grid is nearing capacity.

The public was not clearly informed from the start that there would be separate applications. Householders along the grid route were not consulted in the same way as if the route had been presented as part of the complete project. The community is therefore being asked to pay separate fees and make separate submissions on what is, in practical reality, one connected project.

The EIAR scoping material referred to a 110 kV grid connection, but it did not appear to assess the full route, wider grid upgrades, all associated road works or all cumulative impacts. Comments

from statutory bodies referring to Lough Gill appear to relate to pollution risks from the wind farm development footprint rather than a full grid route assessment.

This is a central weakness. The full project should be assessed together, including the wind farm, grid connection, turbine delivery route, road works, borrow pits, drainage, forestry clearance, construction compounds and cumulative effects with Faughery Wind Farm and other wind energy proposals in the wider area.

EirGrid Powering Up the North West - Route Constraints

I also rely on the EirGrid Powering Up the North West Project Overview, September 2025, Route Options, page 10. Source: https://cms.eirgrid.ie/sites/default/files/publications/Powering-Up-the-Northwest-Project-Overview-September-2025.pdf. In identifying constraints, EirGrid refers to physical constraints, landscape and visual constraints, cultural heritage constraints, and people and the environment. Under people and the environment, EirGrid states that it seeks to minimise or avoid impact to people and the environment through careful routing, and that it will avoid towns and villages and maximise the distance from houses and areas with environmental sensitivities, including woodlands and bogs.

This is important because it confirms that the grid route is not a minor matter for the wind farm developer alone. EirGrid is responsible for grid infrastructure and is still only at Stage 4 of a six-stage project. Negotiations with landowners have not been completed. The full route, landowner impacts, environmental constraints and final grid implications therefore remain unresolved while the public is being asked to assess the wind farm.

Most importantly, EirGrid itself identifies woodlands and bogs as environmental sensitivities to be avoided for grid routing. If EirGrid recognises that woodlands and bogs should be avoided for a grid route, it is not credible to treat the same type of sensitive upland woodland, bog, peat and water environment as suitable for fourteen 185 metre turbines, extensive new roads, borrow pits, hardstands, drainage works and a permanent meteorological mast.

This strengthens my objection that the wind farm, grid connection, route options and design flexibility option must be assessed together. It also strengthens the argument that the proposal is unsuitable in principle, rather than merely requiring mitigation.

Grid Capacity, Export Route Uncertainty and Premature Application

I submit that one of the major flaws in this entire planning application is that the grid infrastructure required to carry the electricity from the proposed wind farm is not complete, not finally confirmed and not environmentally assessed as part of one complete project.

This is not a minor technical issue. It goes to the heart of whether the project is real, deliverable and properly assessed. A wind farm of this scale cannot operate without a secure and lawful grid connection. The electricity export route is therefore not optional infrastructure. It is an essential part of the development.

This concern is supported by Government, national, European, EirGrid, local and wind industry sources, all of which repeatedly identify grid capacity, grid reinforcement, curtailment and connection delays as major barriers to renewable-energy development. EirGrid's public material states that its Powering Up the North West programme is required to meet increased electricity demand and enable more renewable energy sources to connect to the grid in the region. EirGrid's September 2025 project overview also confirms the need to strengthen the electricity grid in the North West.

EirGrid also publishes renewable constraint and curtailment reports, confirming that wind and solar projects in Ireland are affected by grid constraints and curtailment. Academic analysis of the all-island electricity system also identifies that Ireland and Northern Ireland cannot always accommodate all available renewable generation because of operational and technical constraints, and that curtailment has increased as installed wind capacity has increased.

The wind industry itself recognises this problem. Wind Energy Ireland has referred to increasing curtailment and constraints on the grid, and to the need for electrification and flexible demand to relieve pressure. At European level, WindEurope has also identified grid connection delays as a significant barrier to wind farm development across Europe, including Ireland.

In that context, the proposed Lissinagroagh Wind Farm is premature. The application is asking An Bord Pleanala to approve fourteen 185 m turbines on Dough Mountain before the full electricity export route and wider grid reinforcement position have been completed, fixed and assessed. This is an unsuitable way to assess a project of this scale.

The developer cannot rely on the general national need for renewable energy while failing to provide a complete, route-specific and environmentally assessed grid solution. If the national and regional grid is already constrained, and if the North West requires major reinforcement, then the Board cannot safely assess this wind farm in isolation from the grid works needed to make it function.

This is especially serious because Dough Mountain is an unsuitable location in principle. It is an upland peat, forestry, hydrology, karst, habitat, landscape and community-sensitive area. It is near protected water systems, rural settlements, small farms, tourism assets, heritage routes, wildlife areas and the setting of Kiltyclogher and surrounding communities. A project should not be forced into such a sensitive landscape simply because the wind industry wants more generation capacity before the grid network is ready to receive it.

EirGrid's own routing principles are also important. EirGrid identifies constraints including physical constraints, landscape and visual constraints, cultural heritage, and people and the environment. It states that routing should seek to avoid towns and villages, maximise distance from houses, and avoid environmentally sensitive areas such as woodlands and bogs. That is directly relevant to this proposal. If EirGrid seeks to avoid towns, villages, houses, woodlands and bogs when routing electricity infrastructure, then the same woodlands and bogs should not be treated as suitable for fourteen 185 m turbines, a permanent 100 m mast, borrow pits, access roads, drainage works, construction compounds and cable trenches.

The public is therefore being asked to assess only part of the development. The wind farm is presented now, while the grid route, grid reinforcement, cumulative grid impacts, landowner impacts, route-specific ecological surveys, bird surveys, bat surveys, watercourse surveys, peat surveys, hydrology assessments, cultural heritage surveys and traffic impacts remain incomplete or outside the main EIAR.

That is not a complete environmental assessment. It is a fragmented assessment of a project that cannot operate without the missing infrastructure.

I therefore submit that the application is premature, incomplete and unreliable. Until the grid connection, wider grid reinforcement works and electricity export route are finally selected, surveyed, environmentally assessed and presented to the public as part of the complete project,

the Board cannot safely conclude that the development will not have significant environmental effects.

The correct planning conclusion is that permission should be refused. The national grid problem cannot be solved by consenting an industrial wind farm in an unsuitable upland peat landscape before the grid needed to carry its electricity has been properly created, assessed and consented.

3. Hydrology, Karst and Water Quality

The proposed development is located in a sensitive upland water environment where surface water and underground water must be assessed together. The affected water system includes underground water, groundwater, karst pathways, springs, swallow holes, caves, hidden drainage pathways, the Lattone River, the County River, Dooard River SAC, Sraduffy River, Lough Melvin SAC, Owenmore River, Lough Gill SAC, Glenfarne River and Lough MacNean. These water systems support fisheries, protected habitats and downstream communities and cannot be treated as separate or secondary receptors.

Photograph: Surface water on Dough Mountain. This shows wet upland ground and supports the objection that the development would be built in a sensitive surface-water and peatland system.

The EIAR does not give adequate certainty regarding karst hydrology. Karst testing and dye tracing have not been carried out, despite local evidence of caves, swallow holes, fast-flowing underground water features and limestone bedrock. Where karst is present, pollution can travel quickly and unpredictably underground. Surface water monitoring alone may not detect contamination.

A cave and water feature have been identified in the Tullyskeherney area, close to heritage features. Water was observed flowing rapidly through the feature. Local concerns were raised at a multi-agency meeting in Kiltyclogher Heritage Centre in November 2019 regarding the tomb,

cave and water connection to Lough Melvin. These features show that the area cannot be treated as a simple surface-water catchment.

The former Faughery Wind Farm water monitoring records are relevant. They identified karst features including a swallow hole and spring, but did not establish full groundwater connectivity by dye tracing. The absence of detected pollution in limited monitoring does not prove that pollutants cannot travel through karst or peatland systems.

The proposed development would involve excavation, borrow pits, road construction, drainage, concrete works, fuel storage, machinery, forestry clearance and soil disturbance on steep upland ground. Any pollution, silt, concrete washout, hydrocarbons or peat disturbance could enter narrow water channels and travel downstream rapidly during heavy rainfall.

The area experiences intense rainfall and flash flooding. Local watercourses swell quickly. Climate conditions are changing, with heavier rainfall events, longer wet periods, storms and forestry windthrow already affecting rural Leitrim. These risks are not theoretical. The combination of steep slopes, peat, forestry, karst and heavy rainfall creates a high-risk water environment.

The EIAR should not be accepted where it relies on assumptions instead of direct proof of groundwater flow, dye tracing, full karst assessment and robust monitoring of all flow paths to Lough Melvin SAC and other sensitive waters.

Photograph: Surface drainage on Dough Mountain. This shows natural drainage and flushed/wet channels across the upland bog, supporting the concern that roads, hardstands and drains could corral or redirect water.

3A. Fundamental Defect in the Soils, Geology and Hydrogeology Study Area - Failure to Assess the Full Receiving Environment

Tobin's scoping report states under Section 7.2 Study Area that the EIAR study area for soils, geology and hydrogeology will "primarily focus on the wind farm site." It then states that the assessment will also consider lands adjacent to the site boundary, downstream environs "to an appropriate extent," and proposed forestry replacement lands. I submit that this wording exposes a fundamental flaw in the environmental assessment from the outset. The assessment was scoped around the wind farm site first, with the surrounding and downstream environment treated as secondary. That is an inappropriate and unsafe approach for a large upland wind farm proposed on Dough Mountain, where the receiving environment is not confined to the red-line boundary of the application.

This is not a lowland industrial site where impacts can be assessed mainly within the footprint of the development. This is an upland mountain, peatland, forestry, karst and water-source environment. The development site sits above rivers, streams, groundwater pathways, springs, swallow holes, caves, protected habitats, protected species, fisheries, farms, homes, drinking-water interests and internationally important lakes. In such a landscape, the correct starting point is not the wind farm boundary. The correct starting point is the full environmental system that may be affected by the project.

Water, peat, sediment and pollution do not stop at a planning boundary. Any disturbance caused by turbine foundations, borrow pits, crane hardstandings, access roads, drainage works, forestry felling, peat excavation, concrete works, hydrocarbon storage, cable trenching or long-term operational drainage can move downhill and downstream. On Dough Mountain, these pathways may include visible surface-water channels and invisible underground karst routes. Therefore, an assessment that "primarily focuses" on the wind farm site risks missing the very receptors most likely to suffer the consequences of the development.

The seriousness of this flaw is increased by the applicant's own scoping material. The same report identifies karst features within the limestone bedrock formation in the study area, confirms the presence of blanket peat in the vicinity, identifies Dough/Thur Mountains NHA adjacent to the site, and identifies Lough Gill SAC, Lough Melvin SAC and Northern Ireland Lough Melvin SAC as nearby Natura 2000 receptors. It also records that GSI landslide susceptibility mapping identifies the central and northern parts of the study area as moderate to high in landslide susceptibility.

These are not minor background constraints. They are the central environmental issues in this application. Once karst, peat, landslide susceptibility, downstream rivers, SAC lakes and an adjacent upland NHA were known, the study area should have been defined by hydrological, geological and ecological pathways. It should not have been primarily defined by the wind farm site boundary.

The phrase "to an appropriate extent" is also inadequate. It does not explain what the applicant considers appropriate. It does not define the downstream limit of the assessment. It does not identify whether the assessment follows every relevant river and stream pathway from Dough Mountain. It does not show whether underground karst connectivity has been properly traced. It does not establish whether Lough Melvin SAC, Lough Gill SAC, cross-border waters, fisheries, drinking-water sources, springs, caves and swallow holes are assessed as primary receptors rather than peripheral matters.

This is a major weakness because Dough Mountain is a source area. The wind farm would not merely sit beside the receiving environment; it would sit above it. The mountain drains into wider catchments and protected water systems. The development would involve large-scale physical intervention at height, including turbine bases, new roads, borrow pits, compounds, drainage infrastructure and forestry operations. The environmental risk therefore travels outward from the site, downhill and downstream. A proper EIAR should follow that risk wherever it goes.

The scoping approach appears to reverse the correct environmental question. It appears to ask first: what is within the wind farm site and what adjacent or downstream lands should also be considered? The correct question should have been: what entire environment may be affected by constructing and operating this wind farm on Dough Mountain?

That wider question includes underground water, groundwater pathways, karst systems, springs, swallow holes and caves; the Lattone River, the County River, Dooard River SAC, Sraduffy River, Lough Melvin SAC, Owenmore River, Lough Gill SAC, Glenfarne River and Lough MacNean; drinking-water and agricultural water interests; peatland stability and peat movement; sediment release and siltation; hydrological changes caused by drainage, road-building and forestry felling; impacts on Dough/Thur Mountains NHA and connected peatland habitat; impacts on Hen Harrier, raptors, Marsh Fritillary, aquatic species and other protected wildlife; cumulative effects with Faughery Wind Farm and other wind-energy infrastructure; and cross-border effects on Lough Melvin and Northern Ireland waters.

In my submission, these matters cannot be treated as secondary to the wind farm site. They are the receiving environment. They are the environment that the EIAR is supposed to protect.

This flaw also affects the reliability of the applicant's conclusions. If the study area is too narrow, the baseline is incomplete. If the baseline is incomplete, the impact assessment is incomplete. If the impact assessment is incomplete, the mitigation cannot be relied upon. If mitigation is designed only around the development footprint, it may fail to protect downstream, underground, cross-border and ecological receptors.

This is particularly serious in a karst landscape. In karst, water can move rapidly and unpredictably through underground channels, fissures, swallow holes and springs. These pathways may not follow surface-water catchment boundaries. They may be rapid, unpredictable and invisible without proper testing. In a karst landscape, it is not enough to assume flow direction from maps or surface drainage.

This weakness is highlighted by the applicant's failure to complete proper dye testing and karst investigation before seeking planning permission. Tobin's scoping report already identified that a number of karst features had been identified within the limestone bedrock formation in the study area. Karst was therefore not an unknown or unexpected issue. It was known at scoping stage.

Once karst was identified, the applicant should have carried out full hydrogeological investigations, including dye tracing where necessary, before finalising the EIAR, NIS and mitigation proposals. It is wholly inadequate to leave essential karst testing, dye tracing or groundwater connectivity studies until after planning permission is granted. That approach reverses the purpose of environmental impact assessment. The purpose of the EIAR is to identify, assess and disclose the likely significant effects of the project before consent is given, so that the

competent authority and the public can understand the real risks and evaluate whether the project should be permitted at all.

Dye tracing is essential because karst systems can transmit water, sediment and pollution through underground fissures, conduits, swallow holes, caves and springs. These pathways may not follow surface-water catchment boundaries. They may be rapid, unpredictable and invisible without proper testing. In a karst landscape, dye tracing may be the only practical way to establish actual underground connectivity between disturbance areas and receiving waters.

This is critical at Dough Mountain because the proposed development involves large-scale construction on an upland source area, including turbine foundations, borrow pits, access roads, crane hardstandings, drainage works, forestry felling, excavation, concrete pouring and hydrocarbon use. If underground karst pathways connect the site to rivers, springs, caves, Lough Melvin SAC, Lough Gill SAC or local water supplies, then the risk is not theoretical. It is a direct pathway for environmental harm.

The failure to complete dye testing before consent means the EIAR cannot reliably answer basic questions, including where groundwater from the turbine and borrow-pit areas actually flows; whether swallow holes, caves, springs and underground channels connect to protected waters; how quickly pollution or sediment could move through the system; whether local wells, springs, farms or drinking-water interests could be affected; whether Lough Melvin SAC, Lough Gill SAC or cross-border waters are connected through hidden pathways; and whether proposed mitigation can actually work in the real hydrogeological system.

Without that information, the applicant cannot safely conclude that there will be no significant effects on water, fisheries, protected habitats, protected species or European sites.

This also exposes the inadequacy of Section 7.2 of the scoping report. The study area was said to primarily focus on the wind farm site, with adjacent lands and downstream environs considered only “to an appropriate extent.” That approach is especially defective in a karst environment, because the true zone of influence cannot be defined by the red-line boundary or by visible surface drainage alone. It must be established through proper investigation of underground pathways before the EIAR is completed.

Leaving karst studies until after planning permission would unlawfully defer a central environmental assessment issue. It would allow the project to be consented first and understood later. That is not precautionary, not transparent, and not sufficient for a development of this scale in an upland peat and karst landscape draining toward protected waters.

This is not a matter that can be dealt with by a planning condition. A condition requiring later dye testing would not cure the defect, because the public, prescribed bodies and competent authority would already have been deprived of the information needed to assess the application. If later testing showed a serious underground connection to Lough Melvin, Lough Gill, springs, caves or drinking-water sources, the project design, turbine locations, borrow pits, roads, drainage and mitigation could all require fundamental reconsideration.

It is also particularly serious in an upland peat landscape. Peat stability, peat drainage and peat erosion are not confined to the exact location of a turbine base. Disturbance in one area can alter water movement, slope stability and sediment release over a wider area. Roads, drains, borrow pits, tree felling and construction traffic can change how water moves through peat and across

slopes. On a mountain with moderate to high landslide susceptibility in parts of the study area, the assessment should have been precautionary, catchment-wide and slope-system based.

The applicant's approach also risks under-assessing cumulative effects. Faughery Wind Farm is adjacent to the proposed Lissinagroagh development. The wider Dough Mountain area has already been altered by wind-energy development, forestry, roads and drainage. A study area primarily focused on the new wind farm site is not sufficient to assess cumulative impacts on peat, hydrology, birds, wildlife, landscape, water quality and downstream receptors.

I therefore submit that Section 7.2 reveals a serious scoping defect. The EIAR study area for soils, geology and hydrogeology should have been defined by the full zone of influence of the development, not primarily by the wind farm site. That zone of influence should include all surface-water, groundwater, peatland, karst, ecological and downstream pathways from the turbine locations, roads, borrow pits, compounds and felling areas to their final receiving environments.

The competent authority cannot be satisfied that the EIAR has properly assessed the likely significant effects of the project where the assessment has been framed too narrowly from the outset. The applicant has not demonstrated, with the necessary certainty, that the development will not significantly affect Lough Melvin SAC, Lough Gill SAC, Dough/Thur Mountains NHA, downstream rivers, drinking-water interests, fisheries, protected species, peat stability, karst groundwater or cross-border waters.

For these reasons, I submit that the soils, geology and hydrogeology assessment is fundamentally deficient. The flaw is not merely a missing detail that can be corrected by condition. It goes to the structure of the EIAR itself. The study area is too narrow, the wider receiving environment is treated as secondary, and the assessment does not properly follow the environmental pathways from Dough Mountain to the sensitive receptors at risk. On that basis, the application should be refused.

3B. 2021 Screening Assessment, Karst Zone of Influence and Cave Emergency Monitoring Failure

I submit that the 2021 Screening Assessment for the temporary 100 m meteorological mast is important because it confirms that TOBIN accepted the possibility of pollution pathways from construction works, even for a much smaller temporary structure.

The 2021 screening material identified potential impacts including release of sediment and pollutants to surface water, particularly during high rainfall; transportation, pouring of concrete and washing of concrete lorry flumes, with risk of entry to groundwater and surface water; potential spillage of oils, fuels or other pollutants into groundwater; and disturbance or displacement of species during construction and decommissioning.

This is directly relevant to the present application. The current proposal is not a temporary mast. It is a fourteen-turbine wind farm with 185 m turbines, turbine foundations, hardstands, access roads, borrow pits, drainage works, forestry felling, construction compounds, cable trenches, grid infrastructure, concrete works, heavy machinery, fuels, oils and long-term operational infrastructure.

If TOBIN accepted in 2021 that sediment, concrete washout, oils, fuels and pollutants could enter surface water and groundwater from temporary mast works, then the same risks are far greater for the current wind farm proposal. These are not imaginary or speculative risks. They are risks identified by the applicant's own consultants in earlier screening material.

The 2021 screening material also relied on the source-pathway-receptor model. It identified sources such as sediment runoff from proposed works, pathways such as drains and streams connecting to European sites, and receptors such as qualifying habitats and species of European sites. It also stated that European sites within 15 km should be reviewed, as well as sites outside 15 km where a viable source-pathway-receptor link exists.

In my submission, the main Zone of Influence is the karst system itself. The EIAR cannot safely treat the Zone of Influence as mainly a surface-water issue measured by distance from drains, streams or watercourses. In this landscape, the most serious risk is that pollution, sediment, peat-contaminated water, concrete washout, hydrocarbons, silt or other construction pollutants could enter underground water, karst pathways, caves, fissures, swallow holes, springs or hidden drainage routes.

Once pollution enters karst, it cannot be prevented in the normal sense. It may move underground without being visible. It may bypass surface-water controls such as silt fences, settlement ponds, check dams, drains or monitoring points. It may emerge elsewhere in springs, streams, rivers, wells, lakes or protected waters. By the time pollution is detected, it may already have travelled through the underground system.

This is especially serious near T7 and T8, where cave and karst features are known locally and where the applicant has not, in my submission, properly investigated the cave system before seeking permission. If the cave at or near T7 has not been fully investigated, mapped, dye-tested and assessed, then the applicant cannot know where water entering that cave system will travel, how fast it will move, or where it will re-emerge.

Photograph: Swallow hole on the slopes of Dough Mountain with water flowing into the ground. This supports the objection that the main Zone of Influence is the karst system and that pollution could enter underground pathways.

Photograph: Full width of cave/karst feature near the wind farm landscape. This supports the concern that caves and underground pathways have not been adequately investigated, mapped or monitored before permission is sought.

Photograph: Swallow hole adjacent to proposed T8, overlooking Manorhamilton. This supports the objection that karst openings close to turbine infrastructure could allow water or pollutants to enter underground pathways.

Photograph: Cave / karst feature located between the proposed wind farm area and Lough Melvin. This photograph shows water seeping down the cave walls, even though the weather was dry when the photograph was taken. I rely on this photograph to support my concern that caves, swallow holes and underground pathways cannot be monitored or protected by ordinary surface-water controls once pollution enters the karst system. The applicant must explain how this cave system would be accessed, investigated and monitored during high rainfall or an emergency event.

The applicant has not answered the practical emergency questions. How will polluted water be physically prevented from entering caves or swallow holes? Where exactly are all caves, fissures, springs, swallow holes and karst openings in and around T7 and T8? Has dye tracing been carried out from the cave or swallow-hole area? Where does water entering the cave system discharge? How long does underground flow take to reach springs, streams, rivers or Lough Melvin SAC?

The applicant also has not explained how the cave system would be monitored. Monitoring is especially problematic in karst. A stream can sometimes be visually inspected, a drain can sometimes be sampled, and a settlement pond can sometimes be checked. But underground karst cannot be monitored properly unless the underground pathway is known. If the cave at T7 has not been investigated, then the applicant cannot design a reliable monitoring system.

The applicant cannot say it will monitor downstream if it does not know where the underground water goes. Karst water may bypass expected surface channels. It may emerge in a spring, a river, a wet flush, a farm water source, a lake margin or another hidden point. By the time pollution is detected, it may already have caused damage.

This is why post-consent investigation is not acceptable. The Board must know before permission is granted whether caves, swallow holes and karst pathways create a pollution route to protected waters. If that information is missing, then the Appropriate Assessment and EIAR cannot be complete.

In my submission, the applicant has not shown how caves and swallow holes will be protected or monitored. If the karst system has not been fully investigated, then the true Zone of Influence is unknown. Where the pathway is unknown and pollution cannot realistically be recovered once it enters underground water, the precautionary conclusion must be refusal.

3C. Watercourses as Natural Connected Systems

I submit that the EIAR fails to properly treat the Dough Mountain watercourse system as a natural connected catchment. The SEPA guide Watercourses in the Community states that watercourses, drainage and flooding are natural systems which establish an equilibrium, and that human interference can cause increased runoff, flooding, erosion and downstream flooding. It also states that natural river systems should remain untouched wherever possible and, where interference is necessary, every effort should be made to maintain the natural balance.

This is directly relevant to Lissinagroagh. The proposed development would not merely place turbines on isolated points. It would introduce roads, foundations, hardstands, borrow pits, drainage systems, felling areas, cable trenches and watercourse crossings into an upland source area. These works would interfere with the natural movement of water from Dough Mountain through soils, peat, drains, streams, springs and watercourses.

The guide also states that action in one part of a river will cause a reaction elsewhere, and that a damaged stretch can endanger wildlife for many miles. This supports my submission that impacts from Dough Mountain cannot be confined to the red-line boundary. Any change to flow, sediment, erosion, drainage, peat movement or pollution can move downstream through North Leitrim and towards sensitive receiving waters including Lough Melvin SAC.

The EIAR should therefore assess the full natural catchment system and not simply rely on engineering controls, barriers or emergency response. The correct approach is to avoid damaging the natural watercourse system in the first place.

4. Peat, Geology, Landslide and Bog Movement Risk

The site includes upland blanket bog, peat, forestry on peat, steep slopes, water channels and sloping upland terrain. These are exactly the conditions where peat instability, bog movement, erosion, slippage and sediment release must be treated with extreme caution.

Photograph: Bog slippage on the summit of Dough Mountain, approximately 460 m above the turbine site. This supports the objection that peat movement and slope instability are real risks in the upland system.

The Geological Survey Ireland classification of the area includes low to moderately high landslide susceptibility. The area also has a history of landslides, mapped faults, caves, borrow pits, peat cutting, steep terrain, high rainfall and low-permeability bedrock leading to a high water table.

The previous refusal of Croagh Wind Farm by An Bord Pleanala is relevant to the assessment of peat and landslide risk in upland wind farm development. The 2009 refusal history for this area is also highly relevant. It is not sufficient for the developer to treat the current application as if the past planning and environmental history can be ignored.

The proposed turbines, access roads and borrow pits would require major excavation and ground disturbance. There are concerns that the volume of material to be removed, moved or reused may be underestimated. The borrow pit sizes and the quantities of soil, peat, rock and spoil need to be independently examined.

Coillte AIE material is also important. Coillte indicated it had no official policy or criteria for bog or soil movement and no maps or reports of historic or current soil or ground movement, apart from limited meeting records. The absence of records is not proof of absence of risk. In a high-risk upland peat and karst environment, lack of records is a gap in assessment, not reassurance.

The EIAR appears to separate commercial forestry from the wider upland peatland and NHA system. This is not realistic. The hydrology of peat, forestry drains, blanket bog, exposed peat faces, watercourses and downstream habitats is connected. Dough Mountain NHA may not

include every forestry block, but ecological and hydrological systems do not stop at mapped boundaries.

4A. An Bord Pleanala Croagh Wind Farm Refusal - Pointers that Apply to Lissinagroagh

I request that An Bord Pleanala apply the same core caution and refusal logic from the Croagh Wind Farm refusal to Lissinagroagh Wind Farm. The physical, peat, drainage, landslide, construction and landscape risks identified in the Croagh refusal are directly relevant to this site. In many respects, they are repeated or intensified at Dough Mountain, Thur Mountain, Saddle Hill and the surrounding upland bog and forestry landscape.

- Geological Survey Ireland classifies parts of the site and surrounding area as having low to moderately high landslide susceptibility.
- There is a high density of historical landslides in this upland area, including within or close to the proposed development lands.
- There are numerous mapped faults, caves, swallow holes, borrow pits and unmapped underground features within and around the Study Area.
- The terrain is upland, sloping and exposed, with Dough Mountain rising to approximately 460 m and overlooking the wind farm site and adjacent NHA upland bog.
- High rainfall levels are prevalent in this part of north Leitrim, increasing the risk of peat saturation, surface water pressure, erosion and bog movement.
- Upland blanket bog is the dominant soil type at the site and any biological impact on this natural resource must be assessed with extreme caution.
- The low permeability of the limestone bedrock and associated geology can contribute to a high water table and rapid movement of surface and underground water.
- There is a high density of water channels throughout the site, both natural and man-made, including steep gorges, flash flood channels and forestry drains.
- Timing construction outside the breeding season for birds may coincide with wetter periods, increasing peat, drainage, access, sediment and pollution risks.
- Large areas of forestry are to be clear-felled, leaving peat and subsoils exposed to rainfall, erosion, windthrow and slope instability.
- Extensive water crossings and crossing upgrades would be required across a sensitive upland drainage network.
- Deep peat occurs at turbine locations and along existing and proposed access roads, creating excavation, bearing capacity and long-term stability concerns.
- Significant volumes of peat and other material would require excavation, handling, storage and management on site.
- Instability may arise from movement and placement of waste material, including large volumes of waste peat and spoil on bogland and hilly terrain.
- Any proposed peat or spoil repositories, retaining buttresses or containment structures must be treated as major engineering works in unstable upland conditions, not as minor mitigation.
- The peat-dominated nature, size and location of any repository areas create risk to drainage, groundwater, surface water and adjacent bogland.
- The drainage of the site, and the control of groundwater and pollutants entering underground and surface water channels, remain central unresolved issues.

- The construction of each turbine, hardstanding, access road, compound, drainage system and borrow pit would interfere with the natural terrain and dissect habitats, nesting areas and hunting sites.
- The development would have a destructive effect on adjacent upland bog, including the NHA bog above and overlooking the site.
- There is risk of bog movement in the upland bog NHA adjacent to the wind farm, including visible bog slippage and exposed peat on the lower end of the upland bog adjacent to the road to Kiltyclogher.
- The proposed drainage system is highly complex and would be imposed across an already sensitive and saturated upland landscape.
- The large number of unmapped caves, borrow pits, swallow holes and marshy areas within and surrounding the Study Area means the risk cannot be fully understood without direct investigation.
- Trees felled by Storm Eowyn and other recent storms, especially visible around the T7 and T8 areas, show the changing and unstable landscape conditions now affecting the site.
- Turbines located on the slopes of Dough Mountain are in thick forestry and could not be comprehensively surveyed for peat depth, habitats, birds, bats, caves, drainage or ground conditions.
- The development cannot reasonably be said to withstand mitigated risk where bog movement and overhanging movement are already visible on the slopes of Dough Mountain.

For these reasons, the Croagh Wind Farm refusal pointers should not be treated as remote or unrelated. They apply directly to Lissinagroagh Wind Farm and support refusal because the site is a peat-dominated, upland, sloping, high-rainfall, water-sensitive and landslide-susceptible landscape.

4B. Comparison of Croagh Wind Farm Refusal Issues with Lissinagroagh Wind Farm

I submit that the comparison between Croagh Wind Farm and Lissinagroagh Wind Farm should be placed before the Board as a central planning consideration. The Croagh refusal is relevant because it identifies the same categories of physical, hydrological, peatland, construction and landscape risk that arise at Lissinagroagh. The issue is not that the two sites are identical in every respect. The issue is that the same refusal-level risk factors are repeated at Lissinagroagh, and in several respects they are intensified by the presence of Dough Mountain, Dough/Thur Mountains NHA, karst features, Lough Melvin SAC, Hen Harrier habitat and the wider Kiltyclogher landscape.

The Croagh refusal pointers include Geological Survey Ireland landslide susceptibility, historical landslides, mapped faults, caves, borrow pits, upland and sloping terrain, high rainfall, upland blanket bog, low-permeability bedrock, high water table, dense water channels, clear-felling, deep peat, water crossings, spoil handling, repositories, drainage control and the management of groundwater and pollutants. These are not remote or theoretical concerns. They are the same physical constraints present at Lissinagroagh.

At Lissinagroagh, the proposed works would include fourteen turbines up to 185 m, a permanent 100 m meteorological mast, new and upgraded access roads, hardstands, borrow pits,

construction compounds, drainage works, watercourse crossings, forestry clearance, peat excavation, spoil handling and long-term site management. These works would take place in an upland peat, forestry, karst and water-sensitive landscape on and around Dough Mountain. The development therefore involves the same class of risk that led to serious concern in Croagh: major engineering intervention into unstable or sensitive upland peatland terrain.

The Croagh reasoning is especially important because it demonstrates that mitigation proposals cannot simply be accepted at face value where the underlying environment is high risk. Drainage designs, peat management plans, settlement ponds, monitoring and construction method statements do not remove the fundamental risk where a development requires extensive interference with peat, slopes, water channels, forestry and upland bog. The question for the Board is whether the applicant has removed scientific uncertainty. In my view, it has not.

The Lissinagroagh site presents a particularly strong case for refusal because the proposed wind farm is located beside and below the Dough Mountain upland and NHA landscape. Local evidence shows visible bog movement and exposed peat on the lower end of the upland bog adjacent to the road to Kiltyclogher. The upland bog is surrounded by steep gorges and flash flood channels from Dough Mountain. The site also contains or is surrounded by mapped and unmapped caves, borrow pits, swallow holes, marshy ground and karst features. These are the exact conditions where construction, drainage, excavation and spoil storage may trigger or worsen instability and water pollution.

The hydrological comparison is also significant. In Croagh, drainage, water crossings, groundwater control and pollutant pathways were central concerns. At Lissinagroagh, the risk is compounded by the Sraduffy River, County River and Lattone River route to Lough Melvin SAC, and by separate concerns regarding Lough Gill / Owanmore catchments. In a karst and peat landscape, pollutants may not follow simple mapped surface-water routes. The absence of complete dye tracing, karst testing and verified underground flow-path analysis means the applicant has not proved that pollution, sediment, concrete washout, hydrocarbons or peat disturbance can be safely contained.

The spoil and peat management comparison is equally important. The Croagh refusal pointers identify the risks associated with significant volumes of peat and spoil, waste material movement, repositories on bogland and hilly terrain, and retaining buttresses. Lissinagroagh also involves major peat and subsoil disturbance associated with turbine bases, hardstands, access roads, borrow pits, compounds and drainage works. Any repository or engineered containment area in peat-dominated upland terrain should be treated as a source of additional risk, not as a simple mitigation measure.

The forestry comparison is also directly applicable. Croagh identified the exposure of peat and subsoils following clear-felling. At Lissinagroagh, turbines and infrastructure are proposed in and around commercial forestry on upland peat. Trees fallen during Storm Eowyn and other recent storms are visible around the T7 and T8 areas. This shows that the forestry, peat and slope system is already vulnerable to extreme weather and windthrow. Clear-felling and construction would expose peat and subsoil to rainfall, erosion, drainage pressure and further instability.

There is also a biodiversity and habitat comparison. Access roads, turbine bases, hardstands, drainage and forestry clearance dissect natural habitats, nesting areas, hunting areas and wildlife movement corridors. At Lissinagroagh, this is particularly serious because the area is used by

Hen Harrier and other raptors, and because the wider Dough Mountain upland functions as a connected peatland, hydrological and ecological system. The effects are not limited to the turbine foundations. The development would fragment habitat, displace wildlife and create collision and operational risks for birds and bats.

The landscape comparison is also important. Lissinagroagh would place fourteen 185 m turbines around Dough Mountain, permanently altering views of Lough Melvin, Saddle Hill, Shenaun, Farbreague, Sligo Bay, Truskmore, Conway North, Tievebaun, Benwiskin, Gortnagarn, Lackagh Mountain, Manorhamilton, Bembo Mountain, Naweeloge Top, South Leitrim, Fawley Falls, Donegal Bay, Kinlough, Bundoran, Barnsmore Gap, the Donegal Mountains, Garrison, Belles, Glenfarne, O Donnell's Rock and Arroo Mountain. The remaining northern views are already affected by another wind farm in the distance towards Cuilcagh Mountain. The applicant has not provided photographs or photomontages sufficient to show the full visual scarring across Co Leitrim, Sligo, Donegal and Fermanagh.

For these reasons, the Croagh refusal should not be treated as an isolated decision with no relevance to Lissinagroagh. The comparison shows that the same environmental warning signs are present: peat, bog, steep slopes, high rainfall, water channels, forestry clearance, spoil management, repositories, landslide susceptibility, mapped and unmapped underground features, habitat dissection and landscape harm. The Board should apply the same caution to Lissinagroagh and refuse permission where scientific uncertainty remains.

In my submission, the Garvagh Glebe evidence supports refusal. It demonstrates that the risks are known, local, serious and capable of affecting rivers, fisheries, bogland, habitats, workers, residents and downstream protected waters. The receiving environment at Dough Mountain is too fragile and too important for this development, and permission should be refused.

Emergency planning, pollution barriers and monitoring cannot be treated as proof that the development is safe. They show that the development depends on temporary protection measures and rapid emergency action in an unpredictable upland peat and karst environment. Where pollution can enter karst vertically, and where water can reach Lough Melvin within approximately two hours, emergency response would come too late.

For Lissinagroagh, the risk is greater. The turbines are larger, the works are more extensive, the site is more widespread, and the receiving environment is more sensitive. Dough Mountain is a source area for watercourses across North Leitrim and beyond.

The Garvagh Glebe evidence does not reassure the Board. It does the opposite. It proves that peat failure, forestry felling, turbulence felling, river-risk, worker isolation, emergency rescue, pollution barriers and post-incident response are recognised risks in upland Coillte wind farm settings in County Leitrim.

4K. Conclusion on Garvagh Glebe and Lissinagroagh

It is not acceptable for a development of this scale, in this location, to rely mainly on developer-appointed contractors monitoring their own barriers, drains and mitigation measures. The consequences of failure would be borne by North Leitrim, Lough Melvin, Lough Gill, downstream fisheries, protected habitats, local communities, cross-border waters and other counties, not just by the developer.

This is made more serious by the absence of a clear independent public authority monitoring structure. I understand that the EPA has stated that it is not responsible for monitoring this development. If that is correct, the Board must ask who will independently monitor peat movement,

water quality, karst pathways, flash-flood channels, sediment release, concrete pollution, hydrocarbon risk, fisheries impacts and downstream effects during construction, storms and post-construction operation.

This is the central problem. The proposed wind farm is one development, but the hydrological consequence of an accident or failure would not remain local. Water from upland source areas moves downhill and downstream through rivers, streams, drains, karst features, springs, swallow holes and catchments. Where the source is Dough Mountain, the receiving environment is regional and cross-border.

A pollution or peat-movement event arising from this one development could affect watercourses and catchments extending through North Leitrim and towards sensitive downstream areas including Lough Gill SAC, County Sligo, Lough MacNean, the Lough Erne catchment, Lough Melvin, Kinlough, Bundoran, County Donegal and South Fermanagh.

Dough Mountain is not an ordinary development site. It is an upland source area for a wide network of watercourses. The risk is therefore not confined to the turbine bases, access tracks or red-line boundary.

4J. Dough Mountain as a North Leitrim Source Area

The EIAR therefore cannot rely on emergency response as proof that Lough Melvin SAC and connected waters will be protected. The correct question is not whether the contractor can respond after an incident. The correct question is whether the development can be carried out without creating a realistic risk of pollution entering karst or fast-flowing watercourses in the first place.

All necessary emergency actions would have to occur within that short period, including detection of the incident, communication between workers, stopping works, locating the source, accessing the site, deploying plant and materials, installing barriers, notifying authorities, protecting workers, controlling machinery, protecting residents and attempting to prevent downstream pollution. In reality, those actions could not all be implemented within two hours, especially during heavy rain, low cloud, storm conditions, flash flooding, darkness, poor access or isolated turbine-site conditions.

I also submit, based on local knowledge of the catchment, that water flowing in streams and rivers from Dough Mountain can reach Lough Melvin within approximately two hours. This is highly significant. It means that any peat slide, sediment release, concrete pollution, hydrocarbon spill or polluted runoff entering a stream may reach Lough Melvin SAC before emergency works can be organised, mobilised and completed.

Surface-water mitigation measures such as silt fences, settlement ponds, check dams, interceptor drains or barriers do not solve this problem. These measures are designed mainly for visible surface runoff. They cannot reliably protect groundwater pathways where pollution enters vertically through karst.

This is a critical issue on and around Dough Mountain. The area contains karst features, springs, swallow holes, caves, peat, forestry drains, watercourses and fast-flowing upland drainage pathways. If concrete washout, hydrocarbons, silt, peat fibres, sediment, metals, chemicals or other pollutants enter the ground vertically through karst openings, fissures, swallow holes or permeable pathways, there may be no practical means of stopping or recovering them before they move underground.

I submit that the EIAR also fails to address the most serious practical weakness in its mitigation approach: once pollutants enter the karst ground vertically, they cannot realistically be recovered, contained or mitigated.

4I. Karst Pollution and Two-Hour Flow Path to Lough Melvin

For fourteen 185 m turbines spread across upland peat and forestry, the number of required barriers and monitoring points would be vast. The EIAR has not shown how many people would be permanently present on site during bad weather to inspect and maintain these measures. It is not enough to say that monitoring will occur. The EIAR must identify staffing, locations, response times, equipment, access routes, communications systems and decision-making procedures.

By the time water is seen downstream, peat, silt or pollutants may already have entered the drainage network. Pollution barriers may be overrun during heavy rain or flash-flood events. If a barrier is overwhelmed, blocked, undercut, overtopped or washed out, it may fail at the exact moment it is most needed.

This is not a minor issue. Dough Mountain has isolated flash-flood channels and water pathways. Heavy rain can occur on the mountain while the lowlands of Leitrim remain dry. A person observing weather conditions in a village, compound or lowland location may not know that torrential rain is occurring on the summit, near T13 or T14, in a forestry block, beside a borrow pit or beside a small watercourse.

It should also explain who would inspect them, how often they would be inspected, how they would be maintained during heavy rainfall, how damaged or overtopped barriers would be repaired, and how monitoring would continue at night, during storms, during weekends and during shutdown periods.

The EIAR should identify every location where barriers would be required; every watercourse, drain, spring, flush, seepage pathway, swallow hole and cave that could receive pollution; every turbine, hardstand, access road, borrow pit, drainage feature and felling area that could generate sediment or peat movement; and the number, size and type of barriers required.

That raises a major practical problem for Lissinagroagh. If barriers are required to protect rivers and drains from peat movement, silt, sediment or polluted runoff, the EIAR must explain how such barriers can realistically be installed, maintained, inspected and repaired across a site of this scale.

The Garvagh Glebe correspondence is also relevant because it shows that bog movements were linked to works in the area and that barriers were required to prevent pollution. Those barriers had to be maintained for the lifetime of the works. This proves that peat movement and pollution were not remote or theoretical risks. They were risks requiring active physical intervention.

4H. Barriers, Monitoring and Flash-Flood Risk

The Garvagh Glebe evidence therefore shows a fundamental mismatch. Emergency response is designed for what happens after danger arises. Environmental Impact Assessment is supposed to determine before consent whether the site is suitable and whether significant environmental effects can be avoided. If the project requires emergency plans for peat failure affecting rivers, then the Board must ask whether the site should be developed at all.

This is critical for Lissinagroagh. FuturEnergy is proposing to build a major industrial wind farm on and around upland bog, forestry, watercourses, karst and slopes at Dough Mountain. The EIAR and NIS are supposed to prevent significant effects on the environment before permission is granted. They should not rely on emergency reaction after peat failure, pollution or bog movement has already begun.

This is not a criticism of emergency responders. It is the reality of an emergency. If peat starts moving, if workers are isolated, if machinery is trapped, if roads are blocked or if local residents and authorities have to be alerted, the river, bog, habitat and downstream watercourse are already at risk.

That may be correct once works are underway and people are at risk. However, it also proves that once peat failure occurs, environmental protection is already secondary to immediate rescue, access, machinery and public safety.

The Garvagh Glebe emergency response approach also exposes a fundamental weakness in relying on emergency plans as mitigation. In an emergency, the correct first priority is human safety. The order of priority is employees, machinery, local residents and authorities, followed by prevention and response measures.

4G. Emergency Priorities Show Environmental Protection Would Come Too Late

This issue is not separate from environmental protection. If workers are isolated, machinery is trapped, roads are blocked or emergency access is compromised, then any peat slide, sediment release, hydrocarbon spill or pollution event may be much harder to contain quickly. Worker rescue risk and river-protection risk are linked.

It should also identify how many trained rescue personnel would be required on site, what equipment would be required, how rescue would operate during heavy rain, low cloud, winter conditions or storm events, and whether emergency services could safely access isolated turbine locations such as T13 and T14.

The EIAR should identify how many employees and contractors may be on site during peak construction, where they would be located, what areas are at peat-slide risk, what watercourses or saturated ground could isolate them, what emergency access routes would remain available during peat failure, storm conditions or flash flooding, and how rescue would be carried out if access roads were blocked or ground conditions failed.

That is highly relevant to Lissinagroagh. A rope-based emergency response may be conceivable for a small number of forestry workers in a defined felling area, but it is not realistic as a primary response for a major industrial wind farm construction site involving multiple crews, machines and contractors.

The Garvagh Glebe emergency planning is also relevant to worker safety. The seriousness of the risk is shown by the fact that rescue equipment, including ropes, had to be available in the event of a worker becoming isolated during works. In my submission, that level of emergency planning demonstrates that peat failure was considered capable of creating sudden dangerous conditions for people working on site.

4F. Peat Failure, Worker Isolation and Emergency Rescue Risk

For that reason, the EIAR cannot safely rely on observations taken while mature forestry was still present if the development itself requires forestry felling and major construction works. T13 and T14 should have been specifically identified and assessed as high-risk isolated turbine sites because of their proximity to watercourses, their upland position, the concealed hydrology under mature forestry, and the risk that foundations and hardstands would obstruct or redirect water movement from Dough Mountain.

The EIAR baseline could not properly measure the natural volume, direction and amount of water moving through these sites while the area was under mature forestry. Mature forestry intercepts rainfall, alters evapotranspiration, conceals ground conditions, masks surface seepage, hides small drains and channels, and makes comprehensive survey of peat, springs, flushes and groundwater expression much more difficult. Once forestry is felled, the hydrological behaviour of the site may change substantially.

Each foundation would interfere with the existing movement of water through the landscape. Water currently seeps through the soil and peat from higher ground. The construction of large turbine bases, hardstands, compacted road surfaces, cut-off drains and new drainage channels may

interrupt, redirect or concentrate that water. This could increase local saturation, erosion, sediment movement, slope instability or flash flow into nearby watercourses.

T13 and T14 should therefore not be treated as ordinary turbine locations. They are proposed in a sensitive upland water-source environment where water seeps and moves downslope through soil, peat, forestry drains and natural channels from the summit and slopes of Dough Mountain. Their turbine foundations, crane hardstandings, access tracks, drainage works and associated construction areas would create artificial barriers and artificial drainage controls across natural water movement.

I submit that one of the most important Garvagh Glebe lessons is the treatment of works within 100 m of a river as a high-risk factor. That is directly relevant to proposed turbines T13 and T14, which are isolated turbine locations within 100 m of watercourses.

4E. 100 m River Risk and T13 / T14

The degree of disturbance cannot be safely calculated by reference to a smaller or older wind farm project. Dough Mountain is materially different because it is a source area for watercourses across North Leitrim. Any peat failure, drainage failure, sediment release, concrete pollution, hydrocarbon spill, karst contamination or slope movement could extend beyond the turbine bases and beyond the red-line boundary.

Although the Garvagh Glebe documents are specific to that site, the lesson for Lissinagroagh is even more serious. At the time of Garvagh Glebe, turbines of 185 m blade-tip height were not the type of development being assessed. The proposed Lissinagroagh Wind Farm involves fourteen 185 m turbines, a permanent 100 m meteorological mast, turbine foundations, crane hardstandings, access tracks, borrow pits, drainage works, forestry felling, cable trenches, watercourse crossings and construction compounds across a fragile upland peat, forestry, karst and water-source landscape.

The Forest Service material also recognised bog slide and landslide risk in the Sligo-Leitrim area, and raised matters including soil stability, water quality, habitats, SACs, SPAs, NHAs and cumulative effects. The Garvagh Glebe turbulence felling material is also relevant because it shows that forestry felling associated with turbine operation was part of the wind farm development context.

The Garvagh Glebe Peat Slide Emergency Response Plan was prepared for "rivers at risk from peat failure as a result of tree felling operations". This is highly significant. It confirms that peat failure arising from wind farm-related forestry operations was recognised as a real risk to rivers and downstream waters.

I submit that the Garvagh Glebe Wind Farm records are directly relevant to the proposed Lissinagroagh Wind Farm. They show that peat slide, bog movement, forestry felling, river-risk, worker safety, emergency rescue, pollution barriers and watercourse protection were already known risks in Coillte upland wind farm forestry settings in County Leitrim.

4D. Garvagh Glebe Peat Slide Evidence, Emergency Response Failure and Relevance to Lissinagroagh

4C. Climate Change, Rainfall, Storms and Leitrim-Specific Construction Risk

I submit that the EIAR does not give sufficient weight to recent weather changes in Ireland and County Leitrim when assessing peat stability, drainage, construction risk, forestry clearance, slope movement, water quality, biodiversity, emergency access and long-term resilience.

This is not a general climate argument. It is directly relevant to the suitability of Dough Mountain for wind farm development. The proposed development would place fourteen 185 m turbines, a permanent 100 m meteorological mast, access roads, crane hardstands, borrow pits, drainage

works, cable trenches, watercourse crossings, construction compounds and forestry clearance into an upland peat, forestry, karst and water-source environment.

Met Eireann has confirmed that 2023 was Ireland's wettest year on record and also the warmest year on record. The Met Eireann material records that 2023 included the wettest March and wettest July on record, with March at 185% and July at 201% of their 1991-2020 long-term average rainfall. It also records numerous flooding events during 2023, including during Storm Betty and Storm Babet.

Met Eireann has also recorded that 2025 was Ireland's second warmest year on record, with the years 2022 to 2025 being the four warmest years in the Irish record. This shows that the climate baseline is changing during the very period in which this project is being assessed and promoted.

The EPA states that Ireland has already seen an increase in average annual national rainfall and projects a substantial increase in the frequency of heavy precipitation events in winter and autumn. This is particularly relevant because winter and autumn are also periods when upland ground, peat and drainage systems may be saturated and when construction outside the bird breeding season may coincide with wetter conditions.

The Climate Statement for January 2026 records repeated frontal rainbands, prolonged heavy rainfall and significant flooding during and after Storm Chandra. Storm Eowyn also demonstrates the scale of recent storm risk. Met Eireann records that Storm Eowyn brought Ireland's highest sustained and gust wind speeds, including a gust of 184 km/h at Mace Head and a 10-minute mean wind speed of 142 km/h. These are not ordinary weather conditions. They show the type of extreme storm environment that must be considered when assessing forestry windthrow, turbine resilience, access roads, ESB lines, communications infrastructure, drainage, water monitoring and emergency response.

County Leitrim's own Climate Change Risk Assessment is directly relevant. It records that recent surface-water and river flooding events in 2020, 2021 and 2022 caused damage to bridge infrastructure, inundation of buildings and transport disruption in Leitrim. It also states that projected increases in extreme precipitation will increase surface-water and riverine flood risk for County Leitrim. The same Leitrim assessment records that flash flooding from heavy rainfall damaged Ballinaglera bridge in August 2021 and that heavy rainfall in June 2020 caused a major peatland slip at Greaghnaglogh involving approximately 160,000 tonnes of peatland.

This is highly relevant to Lissinagroagh. Peat movement, bridge damage, flash flooding, road damage and transport disruption are not theoretical risks in County Leitrim. They are already documented impacts. The proposed wind farm would involve major construction on an upland peat and forestry landscape with steep slopes, drainage channels, borrow pits, exposed peat, watercourse crossings and downstream links to Lough Melvin SAC and other sensitive waters.

The Leitrim Climate Change Risk Assessment also records that severe windstorms are frequent in County Leitrim and can disrupt transport, electricity and communication networks, including through tree fall on overhead lines. This supports my concern regarding forestry windthrow, ESB resilience, Net1 telecommunications, emergency communications and access during and after storms. The storm-damaged forestry visible around parts of the proposed site, including the T7 and T8 area, should be treated as evidence of real climate exposure and instability, not as a minor forestry issue.

Climate change also increases risk through heat, drought and fire. The Leitrim assessment records that heatwaves and droughts have damaged road surfaces, contributed to uncontrolled fires and caused water-supply restrictions, and that such events are projected to become more frequent. This matters because upland peat and heath are vulnerable not only to saturation and slippage, but also to drying, oxidation, fire and long-term habitat damage.

For these reasons, the EIAR should not rely on normal or historic assumptions about rainfall, drainage, ground stability and construction conditions. It should assess the project against the present and emerging climate reality: wetter extreme events, prolonged rainfall, flash flooding, severe storms, forestry windthrow, peat movement, drought, fire risk, infrastructure disruption and changing baseline conditions.

This is also directly relevant to the proposed long permission period. If a ten-year permission is granted, construction may occur long after the original surveys and assumptions were made. During that time, rainfall patterns, peat condition, forestry condition, drainage behaviour, storm damage, biodiversity use and watercourse conditions may all change. The EIAR should not be accepted where the climate baseline may be stale before construction even begins.

I submit that the recent Met Eireann evidence, EPA climate projections and County Leitrim Climate Change Risk Assessment all support a precautionary approach. Dough Mountain is an upland peat, forestry, karst, hydrological and ecological source area. It is not a suitable location for major wind farm infrastructure in a period of increasing weather extremes. The combination of climate change, high rainfall, storm exposure, peat instability, forestry windthrow, flash-flood channels and downstream protected waters weighs strongly against permission.

Sources relied on for this section include Met Eireann material confirming 2023 as Ireland's wettest and warmest year on record; Met Eireann Annual Climate Statement for 2025; Met Eireann Climate Statement for January 2026 and Storm Eowyn material; EPA climate change material on increased heavy precipitation; and the County Leitrim Climate Change Risk Assessment.

4L. GSI/GIS Mapping, Incomplete Bog Movement Records and Unreliable Baseline Risk Assessment

I submit that the EIAR cannot minimise landslide and peat-movement risk where the GSI/GIS mapping shows that the proposed Study Area is in, beside or immediately connected to mapped higher-risk landslide susceptibility areas. This mapping should be treated as a warning sign, not as reassurance.

The EIAR cannot safely rely on the absence of a recorded landslide within a narrow site boundary as proof that the site is stable. Bog movements, peat slips, drainage failures and slope instability are often local, historic, undocumented or only known to landowners, forestry operators, local residents, farmers and people familiar with the mountain.

This is especially important where Coillte is the landowner of much of the relevant upland forestry landscape. If Coillte does not maintain an official, complete and accessible record of past bog movements, current bog movement, drainage failures, peat instability, forestry-related ground movement and potential future risk areas on its lands, then the GSI database cannot be assumed to contain a complete record of the true condition of the landscape.

GSI records can only be as complete as the information reported, investigated and made available to it. If the majority landowner does not record or report bog movement systematically, then the national mapping will inevitably understate the true level of risk. The absence of a mapped event is

not proof that no event occurred. It may simply mean that the event was not recorded, not reported, not mapped, or not investigated.

This is a serious weakness in the Lissinagroagh EIAR. The developer assessment appears to be mainly confined to the defined Study Area and the proposed wind farm footprint. There is no evidence that the applicant carried out a comprehensive field survey of bog movement, peat instability, drainage failure, slope movement, hidden watercourses, springs, swallow holes, caves, forestry drains and historic ground disturbance outside the Study Area across the wider Dough Mountain system.

That is not acceptable in this location. Dough Mountain is not a self-contained development platform. It is an upland peat, forestry, karst and hydrological source area. A peat movement event may begin outside the Study Area but still affect the proposed works, or may be triggered by works inside the Study Area and then travel beyond it. Water, peat, sediment and pollution do not stop at the applicant red-line boundary.

The same applies to mapped risk areas. If the GSI/GIS maps show red/orange higher-risk landslide susceptibility within or adjacent to the Study Area, the EIAR should not isolate individual turbine bases and conclude that the risk is acceptable. The whole connected upland system should be assessed, including adjacent slopes, forestry blocks, drainage channels, watercourses, karst features, known and suspected bog movements, historic peat disturbance and downstream pathways.

The Garvagh Glebe material reinforces this point. The existence of a Peat Slide Emergency Response Plan for rivers at risk from peat failure shows that peat failure in Coillte wind farm forestry landscapes in Leitrim was a known and serious risk. It also shows that emergency planning may become necessary when the actual landscape behaves differently from the assumptions made before or during development.

For these reasons, the EIAR findings on landslide risk, peat stability and bog movement should not be relied upon. The baseline is incomplete. The risk record is incomplete. The Study Area is too narrow. The Board cannot have the necessary certainty that the proposed development will not cause peat movement, watercourse pollution, habitat damage or downstream impacts. The precautionary conclusion should be refusal.

4M. Specific Turbine Location Risk - T1 to T14, Gorges, Flood Streams, Rivers, Cave, Borrow Pit and Watercourses

I submit that the EIAR peat, landslide and hydrology assessment is further weakened by the actual turbine locations selected across the site. The proposed turbines are not located on simple, dry, stable ground. They are repeatedly placed beside or above steep gorges, flood streams, rivers, hidden drainage routes, forestry drains, peat, seepage areas, caves, karst features, borrow pit areas and watercourse pathways.

T1 is located in forestry above a steep gorge. My photographic evidence shows bog slippage in this area. Any peat movement, drainage failure, construction runoff, sediment release or slope instability at T1 could move downslope into the gorge and connected watercourse system. T1 should therefore be assessed as part of a steep upland peat and gorge system, not as an isolated turbine base.

T2 and T3 on Saddle Hill are adjacent to flood streams. Flood streams can carry water, peat, sediment and pollutants rapidly during heavy rainfall. Construction of turbine foundations, hardstandings, access tracks, drains or cable trenches near these streams could alter flow paths, increase sediment mobilisation and create pollution risk.

T4, T5 and T6 are in flood-prone areas that are partly hidden by compacted forestry and are adjacent to steep gorges. Mature forestry can conceal drains, flushes, seepage zones, springs, peat

instability and bog movement. Once forestry is felled and construction begins, rainfall and groundwater movement may change substantially.

T7 and T8 raise a separate and serious concern because they are located beside the cave area and proposed borrow pit. This makes them high-risk locations for karst, groundwater, peat stability, excavation, drainage and pollution. The cave is evidence of a karst landscape with underground water movement, voids, fissures, swallow holes or connected pathways. The proposed borrow pit beside this area greatly increases the risk.

T9, T11 and T12 are adjacent to rivers. These turbine locations should have been treated as high-risk locations because construction activity beside rivers creates a direct pathway for sediment, peat fibres, concrete washout, hydrocarbons, silt and disturbed soil to enter flowing water. In an upland catchment, pollution entering a river can move quickly downstream before emergency measures can be put in place.

T13 and T14 are isolated turbine locations within 100 m of watercourses. They are proposed in a sensitive upland water-source environment where water seeps and moves downslope through soil, peat, forestry drains and natural channels from the summit and slopes of Dough Mountain. Their foundations, hardstandings, access tracks and drainage works would create artificial barriers and artificial drainage controls across natural water movement.

The cumulative pattern is clear: T1 above a steep gorge; T2 and T3 beside Saddle Hill flood streams; T4, T5 and T6 in hidden flood areas beside steep gorges; T7 and T8 beside the cave and borrow pit; T9, T11 and T12 adjacent to rivers; and T13 and T14 within 100 m of watercourses. This shows that the proposed layout repeatedly places major industrial infrastructure in the most sensitive water, peat, karst and slope-risk areas of the mountain.

In my submission, the turbine layout itself is evidence of unsuitability. The repeated siting of turbines beside rivers, flood streams, steep gorges, cave/karst features, borrow pits and hidden drainage areas supports the conclusion that Dough Mountain, Saddle Hill and the wider upland system are not suitable for this wind farm development. Permission should be refused.

5. Biodiversity, Hen Harrier and Protected Species

The site and surrounding uplands are of exceptional biodiversity importance. The EIAR and scoping material confirm Hen Harrier nesting activity within the Study Area. Hen Harrier is an Annex I species and is one of the most important protected bird species in this objection.

Photograph: Female Hen Harrier in raptor habitat within the Dough Mountain/Lissinagroagh upland landscape. This supports the objection that the area is an established raptor landscape and that compensation is not avoidance.

Local evidence confirms Hen Harriers hunting and moving through the area, including around Dean's Lake, Lough Melvin, Aughavanney, Glenfarne, Kinlough and the proposed turbine areas. Hen Harriers have been seen hunting in the grassland below proposed T7, flying over T9 and T10, and nesting and hunting adjacent to T13.

The Faughery Wind Farm bird surveys from 2015, 2017 and 2019 are highly relevant. They show Hen Harrier activity, flight paths and use of the wider Dough Mountain uplands. The EIAR should have fully assessed these surveys, because they provide operational and post-construction evidence from the adjacent wind farm landscape. It is not enough to rely only on the most recent surveys without clearly integrating the Faughery evidence.

The wider area also supports or may support Curlew, Ring Ouzel, Buzzards, Eagles and other raptors, bats, Marsh Fritillary butterfly and White-clawed Crayfish in connected water systems. Local people and tourists regularly observe wildlife, including Whooper Swans, Hen Harriers and other birds. The area remains one of small-scale rural farming, upland bog, forestry edge, open habitat and watercourses. This mosaic is part of its biodiversity value.

Photograph: Irish Hare on the Lissinagroagh Wind Farm site. This supports the evidence that the site is a functioning upland habitat, not a low-value industrial site.

Photograph: Nesting Sand Martins adjacent to the proposed 185 m turbine area. This supports the objection that sensitive bird use of the local habitat must be assessed beyond a narrow turbine-footprint approach.

Marsh Fritillary Butterfly - Need for Targeted Seasonal Survey

The Marsh Fritillary butterfly should be specifically assessed. It is an Annex II species under the Habitats Directive and is associated with habitats including bog, upland heath and grassland where Devil's-bit Scabious is present. These are the same broad habitat types present in the wider Dough Mountain, Saddle Hill and Thur Mountain upland environment.

A general biodiversity walkover is not enough to exclude risk to this species. Marsh Fritillary assessment requires targeted habitat assessment and, where suitable habitat exists, seasonal larval web surveys at the correct time of year, particularly September and October. If the applicant has not carried out targeted Marsh Fritillary habitat and larval web surveys across the full area affected by turbines, access roads, borrow pits, drainage works, forestry clearance, grid works and replacement forestry lands, the EIAR is incomplete.

This is also a cumulative issue. Small losses, drainage changes, access-road construction, vegetation clearance and altered grazing or forestry management can fragment habitat and affect larval food plant availability. The assessment should therefore consider Marsh Fritillary habitat within the full zone of influence, including the wind farm site, adjacent upland heath and bog, access routes, drainage corridors and any areas indirectly affected by changes in water movement or land management.

The EIAR acknowledges potential loss of nesting and foraging habitat, but the conclusion does not reflect the seriousness of that loss in a confined upland area already affected by Faughery Wind Farm. The question is not whether some mitigation can be proposed. The question is whether this location should be industrialised further when it supports protected raptor activity and functioning upland habitat.

The development would also be likely to cause extensive displacement of birdlife and wildlife from the open bog, forestry-edge, ravine and upland hunting areas around Dough Mountain. Turbine collision risk, habitat loss, tree felling, road construction, drainage, blasting or excavation, lighting, human activity and operational turbine movement would all increase risk to birds and bats. In my view, the development will result in avoidable bird and bat mortality and long-term displacement from nesting, feeding and commuting areas.

6. Lough Melvin SAC, Fisheries and Downstream Impacts

Lough Melvin SAC is a sensitive and internationally important water body. It supports important fish species, including unique salmonid populations. The County River and Lattone River system connect the uplands to Lough Melvin. Dean’s Lake is also important locally and has been identified as relevant to emergency fish stock.

Photograph: Lough Melvin Special Area of Conservation viewed from the upland wind farm landscape. This shows the relationship between the proposed Lissinagroagh Wind Farm area, upland bog/NHA ground and the protected receiving water of Lough Melvin SAC.

Any sediment, peat, hydrocarbon, concrete, chemical or nutrient release from the development could affect downstream fisheries and habitats. Inland Fisheries Ireland previously stated in FOI correspondence that no site visit had yet taken place at that stage. IFI also warned against diversion of watercourses or increasing flow speed. In a site with many narrow drainage channels and steep slopes, these concerns are extremely relevant.

The Blackwater fish kill example shows how catastrophic water pollution events can be for fish populations. A major incident in the Lough Melvin catchment could have serious ecological, cultural, economic and reputational consequences.

The EIAR must be judged on whether it provides scientific certainty that Lough Melvin SAC, its tributaries and connected habitats will not be adversely affected. I do not believe it does.

7. Dough Mountain NHA and Upland Landscape

Dough / Thur Mountains NHA is a protected upland landscape containing blanket bog, heath, grassland and important habitats. The fact that commercial forestry areas may have been planted before designation does not mean the underlying peat, water movement or habitat network is unimportant.

The proposed development would further fragment and industrialise an upland landscape already affected by Faughery Wind Farm. The turbines would rise to a very significant height above the local plateau and skyline. With turbine foundations at high elevation, the rotor tips would dominate views from Kiltyclogher, surrounding roads, walking routes, farms, heritage sites and tourist locations.

Photomontages do not adequately represent the views experienced by the wider population. They do not capture the daily experience of local residents, walkers, drivers, visitors, farmers or people using the Heritage Centre, caravan area, river walks and caving routes.

Photograph: Elevated view towards Manorhamilton and Bembo Mountain. This supports the concern that the EIAR photomontages do not fully represent the wider landscape and community setting.

This is not an ordinary commercial forestry site. It is part of the wider Dough Mountain upland landscape, visible from and connected to Kiltyclogher and Lough Melvin.

Photograph: View from the summit of Thur Mountain towards Dough Mountain and Sligo. This shows the wider upland setting and supports the objection that the development would alter a broad mountain landscape, not an isolated forestry block.

The wider upland skyline and landscape setting, including views associated with Bembo Mountain and the surrounding border uplands, should be considered as part of the visual and cumulative landscape assessment. These landscapes are experienced as one wider upland setting by residents and visitors, not as isolated development parcels.

The landscape impact is not limited to one local viewpoint. Current unobstructed views and the wider setting of the following mountain ranges, bays, towns and recognised scenic locations would be permanently altered or lost if Lissinagroagh Wind Farm is built: Lough Melvin, Saddle Hill, Shenaun, Farbreague, Sligo Bay, Truskmore, Conway North, Tievebaun, Benwiskin, Gortnagarn, Lackagh Mountain, Manorhamilton, Bembo Mountain, Naweeloge Top, South Leitrim, Fawley Falls, Donegal Bay, Kinlough, Bundoran, Barnsmore Gap, the Donegal Mountains, Garrison, Belles, Glenfarne, O'Donnell's Rock and Arroo Mountain. The only remaining open views would be towards areas to the north where another wind farm is already located and, in the distance, Cuilcagh Mountain.

FuturEnergy has not, in my view, provided photographs or photomontages that adequately show the visual scars that the wind farm, roads, borrow pits, felling, hardstands and turbine bases would leave across the surrounding countryside of County Leitrim, Sligo, Donegal and Fermanagh.

The bog plateau is a vast flat and exposed upland area. In the event of fire, the damage to peat, heather, nesting habitat, feeding habitat and protected species could take many years to recover. There is also risk from swallow holes, marsh ground and hidden karst features on the summit and edges of Dough Mountain NHA.

Photograph: Plateau of Dough Mountain and Faughery Mountain. This shows the open upland plateau and existing Faughery Wind Farm in the wider landscape context, supporting the objection on cumulative landscape, upland bog and visual impacts.

8. Kiltyclogher Village, Community and Tourism

Kiltyclogher is a small rural border village that has worked hard to survive depopulation. The community launched the Kilty Live campaign in 2017, which received national attention and helped attract families to the area. The village is known for community spirit, cultural integration, crafts, music, heritage, walking and rural tourism.

The proposed wind farm would directly affect the future of Kiltyclogher. The village is developing tourism opportunities, including a caravan parking area facing the mountain. The Heritage Centre provides tours to Sean Mac Diarmada's home and local heritage sites, including walking tours and river walks. Cavers regularly use the area and stay locally. Visitors come for wildlife, landscape, peace, farming character, upland views, rivers and heritage.

The proposal would place a large industrial wind farm on the mountain backdrop of the village. This would damage the landscape setting that Kiltyclogher relies on for tourism, local pride and future regeneration. It would also affect the amenity of residents who live in a rural area because of its quietness, views, wildlife and heritage.

The EIAR does not give sufficient weight to the lived reality of Kiltyclogher village. The impact is not just visual. It is social, cultural, economic and psychological. It affects whether the village can continue to attract families, visitors, walkers, cavers and heritage tourists.

Leitrim Tourist Office and Failte Ireland do not heavily promote this sensitive upland plateau as a mass tourism attraction because of the need to protect its habitats, nesting and feeding sites for Hen Harrier, Sand Martins and other wildlife, and its untouched upland bogland character. That sensitivity should not be used against the area by suggesting it has low tourism value. The opposite is true: its value lies in its quietness, remoteness, wildlife, intact views and ecological sensitivity.

9. Archaeology, Heritage and Caves

The area contains important heritage features, including the Neolithic tomb in Tullyskeherney, now recognised as a National Monument, and nearby cave and karst features. Coillte forestry was planted very close to the tomb, showing that historic land management has not always protected heritage appropriately.

The cave and fast-flowing water feature beside the heritage area raise both archaeological and hydrological concerns. Caving activity is part of local tourism and community knowledge. Underground features may also be connected to water movement towards Lough Melvin.

The EIAR should fully assess the interaction between archaeology, karst, underground water, tourism, public safety and construction activity. Heritage cannot be assessed separately from hydrology and landscape where caves, tombs, upland bog and water flow occur together.

10. Roads, Borrow Pits, Traffic and Construction Impacts

The development would require extensive construction works, including approximately 8.5 km of new internal access roads, turbine hardstands, borrow pits, compounds, drainage works, forestry

felling and turbine delivery. The volume of heavy vehicle movements appears likely to be significant.

The local road network is rural and already affected by heavy timber haulage from Coillte forestry. Construction traffic, double trailers, abnormal loads, stone, concrete, peat and spoil movements would place further pressure on narrow roads, bridges, water crossings, residents and road users.

The EIAR must fully identify all traffic, not just turbine component movements. It must include bog removal, excavation, road building, borrow pit material, concrete, imported stone, construction plant, forestry removal, grid connection works and reinstatement.

There is also a risk of invasive species being introduced by large volumes of imported material and machinery. Dust, spores, seeds and contaminated soil could be spread by construction traffic and by wind turbulence across the plateau and down watercourses.

100 m Meteorological Mast - Temporary 2021 Application and Current Permanent Proposal

This is important because the 2021 mast planning application was for a temporary 100 m meteorological mast, whereas the current proposal includes a 100 m mast in a different location as a permanent part of the wind farm infrastructure. A temporary refused mast should not be used to normalise or justify a permanent mast in a different position within a more extensive wind farm development.

The previous 2021 planning application for a 100 m meteorological mast was presented as a temporary mast. That application was refused after a Further Information process, and works had already appeared to commence on site, including site clearance and solar panels. This planning history must be addressed openly and should not be treated as irrelevant background.

The current proposal is different. It relates to a mast in a different location and it is presented as part of the permanent wind farm infrastructure. A temporary 100 m mast used for measuring wind is very different from a permanent mast associated with a fourteen-turbine industrial wind farm. The EIAR and planning assessment should clearly explain why a previously temporary mast proposal was refused, how the current mast differs, why the location has changed, and how its permanent presence affects landscape, aviation, peat, hydrology, telecommunications and cumulative impact.

The mast issue also supports my concern that the project has changed repeatedly over time, while the public has had to follow separate references, changing layouts and incomplete information. The mast should be assessed cumulatively with the turbines, access roads, borrow pits, grid works, aviation constraints, Net1 communications and the wider upland landscape.

10A. Stone, Rock Fill, Borrow Pits, Restricted Storage and Emergency Access Failure

I submit that the EIAR fails to properly quantify the amount of stone, rock fill, emergency material, storage space and long-term containment material required for the proposed Lissinagroagh Wind Farm.

This is a fundamental issue because the development is not a simple road or isolated turbine project. It involves fourteen turbines up to 185 m high, a permanent 100 m meteorological mast, turbine foundations, crane hardstandings, access roads, borrow pits, drainage works, forestry felling, cable trenches, watercourse crossings, construction compounds and movement of peat, bog material, stone, concrete, machinery and emergency supplies across a fragile upland peat, forestry, karst and water-source landscape.

The Croagh Wind Farm Inspector Report is highly relevant. In that case, the Inspector recorded very large volumes of peat and spoil requiring handling, storage and management, and raised serious concerns regarding repository construction, drainage, groundwater, rock conditions, buttressing and long-term containment. The Croagh report is important because it shows that peat, spoil, stone and repository uncertainty is not a minor construction detail. It goes to the environmental safety and practical workability of a wind farm in upland peat conditions.

The Croagh report also shows that stone buttresses and rock fill may be required to contain peat and spoil repositories. For Lissinagroagh, the EIAR must therefore explain not only how much peat and spoil may be moved, but also how much stone and rock fill will be required to contain, stabilise, drain and protect those materials. It must also explain where those materials will be stored and how they will remain available when needed.

The applicant must answer basic questions. How much stone must be available on site before excavation begins? How much stone or rock fill is required for each borrow pit? How much is required for emergency response if peat movement occurs? How much is required for drainage, check dams, barriers, buttresses, roads and hardstands? How much stone is required for fourteen 185 m turbines? Where will that stone be stored before it is needed? Will it be stored beside borrow pits, roads, watercourses or peat areas? Can it be safely stored without creating further runoff, sediment or slope risk?

It is not enough for the EIAR to assume that stone will be available if needed. During heavy rain, flash flooding, bog movement, forestry windthrow or blocked roads, it may be impossible to transport stone quickly to an isolated turbine, borrow pit or watercourse. If emergency rock fill is not already in the correct place, the response may come too late. If it is stored close to the works, its weight may increase ground pressure and worsen instability.

This uncertainty is especially serious because the three proposed borrow pits are adjacent to surface watercourses. Borrow pits are not minor construction features. They involve excavation, rock breaking, haulage, exposed faces, altered drainage, machinery movement, fuel risk, sediment release, slope disturbance and long-term stability issues. Where borrow pits are located beside surface watercourses, the pollution pathway is immediate and direct.

The company also cannot be certain of the true amount of bog, peat, saturated soil and spoil that will have to be excavated, moved, stored or placed into borrow pits. Until the land is opened up, trees are felled, peat is excavated and ground conditions are exposed, the applicant cannot know the full depth, saturation, structure, instability or volume of peat and bog material that will actually have to be handled.

That uncertainty matters because the environmental effects depend on the volume and condition of the material being moved. If the company cannot be certain of the quantity of peat and bog material to be moved into borrow pits, then it cannot scientifically quantify the effects of that movement.

This is particularly important at T13, T14, T7, T8 and T5, where the available storage area is restricted and the risk is greater. These are constrained upland locations close to watercourses, steep ground, karst features, the cave area, borrow pit areas, hidden drainage routes, forestry, peat and steep embankments.

At T13 and T14, the concern is especially serious because they are isolated turbine locations within 100 m of watercourses. Any emergency response material would need to be close enough to be useful, but storing heavy stone, rock fill or construction material near those locations may itself increase pressure on peat, slopes and drainage pathways. This creates a contradiction. If stone is stored far away, it may not be available quickly enough in an emergency. If it is stored close to the works, its weight may worsen instability.

At T7 and T8, the concern is increased by the cave area and borrow pit. These locations raise karst, groundwater, slope, excavation and pollution risks. Heavy storage of stone, rock fill, plant or emergency material beside a cave, borrow pit or karst pathway may alter drainage, increase loading on fragile ground, damage subsurface pathways or contribute to instability.

At T5, the concern is the sensitive slope and forestry area associated with Dough Mountain. Where works occur on or near steep embankments, the placement of heavy material may increase outward pressure on the slope. That pressure can change the balance of peat and subsoil, particularly where the ground is already saturated, drained, disturbed by forestry roots or affected by hidden water movement.

This is not a minor construction logistics issue. In an upland peat landscape, the weight of stored stone, rock fill, machinery and materials can itself become a geotechnical risk. It may compress peat, force water outward, increase pore-water pressure, destabilise the edge of tracks or hardstands, and contribute to slippage on steep embankments.

The risk is even greater because the potential slippage source is from the summit and upper slopes of Dough Mountain. In that context, stored construction material may not prevent movement. It may instead become additional loading or material feeding a moving slope. If bog movement begins upslope, stone, spoil, stored materials, disturbed peat, drainage structures and construction debris could be caught up in the movement and carried downslope towards watercourses, gorges, karst features or rivers.

A further problem is that, as construction progresses, there may be fewer safe places for transport machinery, construction vehicles and emergency supplies to move through or be positioned on the site. Access roads may be occupied by machinery, stone deliveries, concrete vehicles, excavators, drainage works, cable trenching, peat movement, tree felling, temporary barriers, settlement ponds, spoil handling and partially completed turbine works.

This means emergency supplies may be required at the very time when movement across the site is most difficult. If peat movement, flash flooding, drainage failure, pollution, machinery blockage or slope instability occurs, emergency stone, rock fill, pumps, barriers, plant, fuel, spill kits and rescue equipment may have to be transported through a site already obstructed by ongoing works.

The EIAR should explain how emergency supplies will reach T13, T14, T7, T8 and T5 if access tracks are blocked by machinery, peat movement, flooding or forestry windthrow. It should explain how vehicles will turn, pass or reverse on narrow upland access roads during an emergency. It should explain how concrete lorries, stone lorries, excavators and emergency vehicles will move at the same time. It should identify how many trained workers will be permanently available on site to open routes, move machinery, install barriers and respond to pollution.

This issue is directly linked to the Garvagh Glebe evidence. The Garvagh Glebe Peat Slide Emergency Response Plan was prepared for rivers at risk from peat failure as a result of tree felling operations. The existence of that plan shows that peat failure and river-risk conditions are real in Coillte upland wind farm forestry settings in County Leitrim. It also shows that response planning must deal with real access, rescue, machinery, watercourse and worker-safety problems, not just paper mitigation.

For Lissinagroagh, the difficulty is greater because the proposed works are spread across a fragile upland peat, forestry, karst and water-source environment. A construction programme involving fourteen 185 m turbines cannot assume that emergency access will remain available at all times. As the site becomes more disturbed, the number of safe routes and safe storage areas may reduce.

This is not a minor traffic-management issue. It goes directly to whether mitigation can work in practice. If emergency materials cannot reach the correct location in time, then barriers, stone,

pumps and response plans are only theoretical. They will not protect watercourses, peat, karst features, rivers or Lough Melvin SAC once an incident has begun.

In my submission, the EIAR has not shown that emergency stone, rock fill, machinery, storage areas and trained workers can be moved safely and quickly across the site as construction progresses. The more the project advances, the greater the risk that access becomes restricted, storage becomes unsafe, and emergency response becomes too late.

The precautionary conclusion should be refusal. The proposed layout places major works and heavy materials into constrained, fragile and hydrologically connected upland areas, and the EIAR has not demonstrated that the storage, movement and emergency availability of stone and rock fill can be achieved without increasing the very bog movement, slippage and watercourse pollution risks the measures are supposed to prevent.

11. Noise, Shadow Flicker, Aviation and Telecommunications

The proposed turbines would create noise, shadow flicker and visual movement across a rural upland community. Fourteen turbines at 185 metres height could affect dwellings, roads, farms and public viewpoints from multiple directions.

Shadow flicker should not be treated only as a computer model. Local residents, drivers and visitors may experience simultaneous or repeated effects depending on sun angle, topography and turbine layout.

The area also experiences low cloud, heavy rainfall and poor visibility. Air Rescue helicopters, Air Corps aircraft and light aircraft are known to cross the Dough Mountain and border area. The combination of high turbines, upland terrain and frequent low cloud requires serious aviation assessment.

The Net1 mast on the ridge is also important. Many households rely on it for internet access and emergency communication, particularly where other services are weak. Any interference with the mast or communications infrastructure would affect rural households and resilience during storms and power outages.

12. Forestry, ESB Resilience and Storm Risk

The site is located within and beside commercial forestry. Storm events have shown the vulnerability of rural infrastructure where ESB lines pass through Coillte forestry and trees are planted close to lines. Storm Eowyn showed how quickly rural communities can lose power and communications.

The EIAR must assess forestry windthrow, peat instability, road access, emergency response, ESB infrastructure, communication masts, drainage and storm resilience together. The development would add major infrastructure into an already vulnerable upland forestry and peat environment.

13. Public Participation and Consultation

The consultation process was inadequate. Earlier consultation consisted of limited by appointment only sessions in Rossinver Community Centre. Rossinver is not Kiltyclogher. Public transport is limited and this format excluded or discouraged elderly people, disabled people and people without transport.

The development changed over time from earlier larger turbine numbers to the current fourteen-turbine layout. The public was not given a clear, complete and accessible picture of the full project, including the separate grid connection and design flexibility process.

Meaningful public participation requires full information at the right time. The community should not have to discover the grid connection, design flexibility, turbine delivery route, scoping gaps and environmental omissions through FOI, AIE requests and separate planning references.

14. Cumulative Impact with Faughery Wind Farm and Other Development

The EIAR does not adequately address the cumulative impact of the proposed wind farm with Faughery Wind Farm, adjacent forestry, existing roads, previous mast works, the current permanent mast proposal, other wind energy proposals and wider grid infrastructure.

Faughery Wind Farm is directly relevant. It has already changed the original landscape and upland bog environment. It also produced bird survey evidence that should be central to the assessment of Hen Harrier and other species using the wider Dough Mountain area.

Photograph: Existing Faughery Wind Farm viewed across the upland bog landscape. This supports the objection that Lissinagroagh must be assessed cumulatively with existing wind energy development and existing landscape change.

The fact that the current proposal is separate on paper does not mean the ecological, hydrological and landscape impacts are separate in reality. Birds, bats, peatland hydrology, watercourses, views, tourism and communities experience the cumulative effect.

The cumulative assessment must also include Faughery Wind Farm survey evidence from 2015, 2017 and 2019, the 2021 temporary mast application and refusal, the current permanent 100 m mast proposal, forestry operations, storm-damaged forestry, grid connection works, turbine delivery route works, drainage changes, water crossings, peat excavation, borrow pits,

replacement forestry lands and any wider North West grid reinforcement required to export electricity from the project.

It is not sufficient to assess each element as if it is isolated. The receiving environment experiences the combined effect: loss and fragmentation of upland habitat, displacement of birds and bats, collision risk, disturbance to Hen Harrier and other raptors, peat drainage, sediment movement, water-quality risk, hydrological change, visual dominance, tourism impact and community impact. The cumulative baseline should include the existing altered landscape caused by Faughery Wind Farm and forestry, not treat the Lissinagroagh site as a blank or isolated forestry block.

The need for cumulative assessment is made more serious by the separate references for the wind farm, grid connection and design flexibility option. The Board should not allow a fragmented assessment where the wind farm is assessed first and the grid, route, ecology, hydrology, bird, bat and watercourse impacts are left to later or separate processes. In my submission, the cumulative effects have not been assessed with the necessary certainty and this weighs strongly against permission.

15. Design Flexibility and Ten-Year Permission

The application seeks a long construction period and design flexibility. This is unacceptable in such a sensitive location.

The project began around 2017 and the current application is in 2026. If a ten-year permission is granted, the development could be built many years after the environmental surveys and assumptions were made. During that period, scientific knowledge, climate conditions, raptor populations, hydrology, legislation, planning policy and local circumstances may change.

Design flexibility should not be used to avoid full public scrutiny. Turbine height, location, road layout, drainage, grid connection and construction methods matter greatly in an upland peat and karst environment. The public should not be asked to accept future changes without full assessment and a fresh opportunity to comment.

15A. Ten-Year Permission, Climate Change, Storm Eowyn, Forestry Damage and Unpredictable Ground Conditions

I submit that the uncertainty over peat volumes, borrow pit capacity, drainage, tree felling, water movement and climate change becomes a fundamental failure when considered alongside the applicant request for a long permission period.

The EIAR is based on surveys, assumptions and site conditions recorded at a particular point in time. However, the applicant is seeking permission for a development that may not be constructed for many years. During that period, the receiving environment on Dough Mountain may change substantially.

Nobody can reliably predict the combined effects of climate change, increased rainfall intensity, prolonged wet periods, drought and peat drying, storm events, forestry windthrow, disease or forestry decline, commercial tree felling, drainage changes, peat saturation, bog movement, erosion, blocked drains, altered springs, flushes, seepage routes, and changed water flow after tree removal.

This is especially serious because the site is not stable, open, lowland ground. It is an upland peat, forestry, karst and water-source environment. Mature forestry currently conceals much of the true hydrology, peat condition, drainage pattern, slope instability and seepage behaviour. Once forestry is felled, damaged by storm, or altered by management, the water regime may change substantially.

Tree felling can reduce rainfall interception, alter evapotranspiration, expose peat, increase runoff, change soil moisture, affect slope stability and reveal drainage pathways that were not visible during EIAR surveys. Therefore, an assessment carried out while mature forestry is present may not represent the ground conditions that will exist when construction actually begins.

Met Eireann has confirmed that 2023 was Ireland wettest year on record and also the warmest year on record. The January 2026 Climate Statement records prolonged heavy rainfall and significant flooding during and after Storm Chandra, while the Storm Eowyn material records extreme wind speeds. This recent weather evidence shows that the baseline is not fixed.

Storm Eowyn is directly relevant. Met Eireann records that Storm Eowyn underwent explosive cyclogenesis, reached peak intensity near the northwest coast of Ireland, and produced extreme wind speeds, including a recorded gust of 184 km/h at Mace Head and a 10-minute mean wind speed of 142 km/h.

The relevance to Lissinagroagh is direct. The proposed wind farm is located in mature forestry on upland peat. Storm Eowyn has shown that forestry can be damaged, thrown, destabilised or made unsafe by extreme wind events. This is not a remote or theoretical concern. It has already occurred locally and nationally, including on Coillte forestry lands.

Where forestry is damaged by storm, the hydrology, peat stability, access, drainage, slope behaviour and survey baseline can all change. Fallen trees can block drains, expose peat, tear root plates from saturated ground, open new water pathways, increase erosion, destabilise slopes and make site access more difficult. Storm-damaged forestry can also force emergency felling or altered forestry management before construction ever begins.

This is a fundamental problem for a long permission period. A site assessed under mature forestry may later become a site of windthrow, exposed peat, blocked drains, changed runoff, altered watercourses, unstable root plates and emergency forestry works. The EIAR cannot assume that Coillte forestry will remain in the same condition for the duration of the permission period.

My own photographic evidence supports this concern. The photographs of the forestry at T8 and at the 2021 100 m meteorological mast location show the real condition of the site and the vulnerability of forestry, peat and upland ground in this area.

These photographs are relevant because they show that the EIAR cannot treat mature forestry as a fixed, stable or reliable baseline condition. Forestry may conceal peat, drainage, seepage, slope instability and water movement while standing. However, once forestry is damaged, felled, windthrown or disturbed, the ground conditions can change substantially.

The photographs at T8 show forestry conditions in an upland area close to proposed turbine infrastructure. They support my concern that storm events, windthrow, tree failure and forestry disturbance can expose peat, alter drainage, block water pathways, destabilise slopes and make access more difficult. This is directly relevant to the proposed turbine layout, drainage design, watercourse protection and emergency response planning.

The photographs of the 2021 100 m mast location are also important. They show that works and disturbance associated with wind-farm-related infrastructure can occur in sensitive upland forestry and peat conditions. The mast history is relevant because a 100 m mast was previously proposed in this area and the current Lissinagroagh proposal now includes a permanent 100 m meteorological mast as part of the wider development.

In my submission, this is a fundamental defect. The applicant is asking the Board to approve a development now, but the actual construction may occur years later on a changed mountain, with changed forestry, changed drainage, changed peat condition and more extreme climate pressures. The EIAR cannot provide the necessary scientific certainty for those future conditions.

A long permission would therefore undermine the reliability of the EIAR baseline. It would allow the developer to rely on an assessment that may be outdated before construction begins. For a fragile upland peat, forestry, karst and water-source site like Dough Mountain, that is unacceptable.

The precautionary conclusion should be refusal. At minimum, the Board cannot grant a long-duration permission where the applicant cannot predict the combined effects of climate change, Storm Eowyn-type events, tree felling, forestry windthrow, land-use change, peat movement, altered hydrology, borrow pit uncertainty and construction works over the proposed permission period.

16. Turbine Wake Turbulence, Upland Microclimate and Operational Effects on Dough Mountain

I also object because the EIAR has not adequately assessed the operational turbulence, wake effects and microclimatic changes that would be created by fourteen 185 m turbines on the Dough Mountain upland. Dough Mountain rises to approximately 460 m, while the proposed turbine tips would reach approximately 540 m above sea level. The rotating blades would therefore operate across an exposed upland airspace above and around the mountain, not in a lowland or already-industrial setting.

Wind turbines do not simply occupy a small physical footprint. During operation, turbines extract kinetic energy from the wind, increase turbulence, alter surface roughness and can modify the atmospheric boundary layer. These changes may affect near-surface temperature, humidity, wind speed, fog movement, soil moisture, vegetation conditions and ecological processes around and downwind of wind farms.

This is especially important on Dough Mountain because the receiving environment is an upland peat, heath, forestry and watercourse landscape. Research from a peatland wind farm in Scotland found that wind turbine operation affected ground-level microclimate, with potential implications for biogeochemical processes, ecosystem carbon cycling and the true carbon balance of wind energy. That issue is directly relevant here because the turbines would be placed in and around upland peat, blanket bog, wet heath, forestry, watercourses and sloping ground draining towards sensitive catchments.

Dough Mountain must be assessed as an extensive upland peat and surface-water system, not as a small bog feature at the edge of the mountain. The proposed turbines would not merely affect isolated turbine bases or the immediate bog areas around individual foundations. Their wake turbulence would operate across exposed upland airspace and could extend across the wider peatland, forestry, open heath, slopes, water channels and surface-water drainage network.

The mountain functions as a connected upland hydrological and ecological system. Any alteration to airflow, drying, humidity, fog movement, evapotranspiration or near-surface moisture has the potential to affect the wider upland environment, including areas away from the turbine bases. The EIAR should therefore have assessed turbulence and microclimatic effects across the entire Dough Mountain plateau and associated surface-water catchment, not only within narrow turbine construction footprints.

Earlier project material, including Newsletter 1 and Newsletter 2, showed or referred to a section of Dough Mountain within the wider project area. The public were therefore entitled to understand that the mountain formed part of the environmental setting of the proposed wind farm. However, the Study Area identified in the Planning Application has been reduced and does not scientifically analyse turbine wake turbulence across the full Dough Mountain upland. This is a serious omission.

The proposed turbine layout is particularly concerning because turbines are located to the north-west, west, south and south-east of Dough Mountain. This means the development would not create a single predictable wake in one direction only. Depending on wind direction, wind speed and atmospheric conditions, the turbine array would create artificial cross-turbulence across the mountain on a repeated and continuous operational basis.

Natural wind conditions on an upland mountain are already variable, but nature does not create rotating turbine-blade turbulence from multiple directions on a permanent industrial scale. This is an artificial operational effect created by the proposed development. The EIAR does not provide a reliable site-specific scientific basis to assess or exclude the effects of this continuous cross-turbulence on delicate upland peat, surface water, fog movement, humidity, vegetation, wildlife, insect life, bird flight behaviour and the microclimate of Dough Mountain.

The effects are not limited to human amenity or turbine performance. Scientific literature records that wind farms can alter local temperature and humidity, with potential consequences for soil moisture, vegetation and ecological processes. On Dough Mountain, even small changes in near-ground drying, moisture movement, wind exposure, fog, cloud interaction or evapotranspiration may be significant because upland peatland and wet heath habitats depend on stable waterlogged conditions.

This is also relevant to wildlife. Dough Mountain is part of a wider upland habitat used by protected and sensitive species including Hen Harrier, raptors, hare, upland birds, insects and other wildlife. Turbine wake turbulence, blade-tip vortices and altered wind-flow conditions may affect flight behaviour, foraging patterns, prey distribution and habitat quality. The EIAR should therefore assess not only collision risk, but also the wider ecological consequences of operating large turbines in a sensitive upland airspace above known wildlife habitat.

In my view, the EIAR is inadequate because it fails to provide a site-specific assessment of turbine-induced turbulence and microclimatic effects for this upland peat and mountain environment. The assessment should include modelling of wake behaviour over the actual Dough Mountain terrain; likely downwind wake zones under prevailing wind directions; artificial cross-turbulence from turbines positioned to the north-west, west, south and south-east; effects on near-surface temperature, humidity, fog, soil moisture and evapotranspiration; interaction with forestry edges and cleared areas; and ecological consequences for peatland habitats, protected birds and other wildlife.

In the absence of this assessment, An Bord Pleanala cannot safely conclude that the proposed development would not significantly affect the local environment, wildlife, peatland hydrology, surface-water systems or upland microclimate. The operational turbulence from fourteen 185 m turbines, reaching approximately 540 m above sea level, would not be confined to individual turbine bases or to bog at the edge of the mountain. Given the reduced Study Area, the height of Dough Mountain, the scale of the turbine array, the sensitivity of the peatland and the

importance of the area for protected wildlife, the precautionary approach should apply and permission should be refused.

16A. Recharge News / Cosmo Sanderson Wind-Wake Source and Visual Evidence

I also rely on public reporting by Cosmo Sanderson in Recharge News as supporting evidence that wind-farm wakes and turbulence are recognised operational issues in the wind-energy sector. Recharge identifies Cosmo Sanderson as a journalist covering wind power and other energy-transition technologies.

Cosmo Sanderson, Recharge News, 30 September 2024, reported on wind-farm wake effects in an article titled "Staggering wake losses pose grave threat to offshore wind sector, warn experts". The article states that "Frightening" new data shows wind wakes between offshore wind farms have been massively underestimated. The same Recharge article uses a visual image/caption describing "wind wakes trailing behind turbines".

I do not rely on the Recharge image or article as proof of the exact impact at Dough Mountain. I rely on it as supporting material showing that turbine wakes are a known and visible operational effect of wind farms and that wake behaviour can be significant enough to be reported as a serious issue within the wind industry itself.

The visual image is important because it communicates the issue in a way that words and technical tables may not. It shows that turbine wakes are not confined to turbine bases, turbine foundations or narrow construction footprints. They are an operational air-flow effect created by rotating blades and can extend downwind from turbine arrays.

This is directly relevant to Lissinagroagh. The EIAR should have assessed whether fourteen 185 m turbines around Dough Mountain would create wake turbulence, altered wind-flow conditions, changed local moisture movement, fog interaction, drying effects, vegetation impacts, bird-flight effects, insect effects and peatland microclimate impacts across the wider mountain environment.

The Recharge material should therefore be attached as an appendix item, with full acknowledgement to Recharge News and Cosmo Sanderson, and used only as supporting evidence for criticism and review of the EIAR's failure to assess wind-farm wake turbulence and microclimatic effects at Dough Mountain.

17. Full Life-Cycle Environmental Impact, Waste and Decommissioning Concerns

I object to the presentation of Lissinagroagh Wind Farm as environmentally acceptable simply because it is described as renewable energy. A wind farm is not impact-free. It is a large industrial development requiring major quantities of concrete, steel, copper, composite blade materials, cabling, access roads, hardstands, foundations, borrow pits, forestry clearance, peat disturbance, grid infrastructure, maintenance works and eventual decommissioning.

The transcript “The Dark Side of Green Energy” highlights an important issue directly relevant to this application: the environmental impact of wind energy cannot be measured only at the turbine site or only during the operational phase. The whole system must be considered,

including raw material extraction, manufacturing, transport, construction, operation, maintenance, waste, recycling and decommissioning.

This is especially important for Lissinagroagh because the proposed development is not a small or low-impact project. It proposes fourteen turbines of up to 185 m, large turbine foundations, extensive internal access roads, borrow pits, crane hardstands, compounds, forestry clearance, peat disturbance and associated drainage works on and around Dough Mountain. The claimed climate benefit must therefore be balanced against the local environmental damage caused by construction, peat excavation, hydrological change, biodiversity loss, landscape impact and long-term industrialisation of the mountain.

International case studies referred to in the transcript, including copper mining, rare and specialist metals, contamination zones and turbine-blade waste, show why renewable energy infrastructure should not be accepted uncritically as “green”. Wind turbines, substations, underground cabling and grid infrastructure require substantial materials. The applicant should be required to disclose the expected quantities of copper, steel, concrete, composite blade material, cabling and other critical materials required for the entire project, including the separate grid connection and any wider grid upgrades.

This point is also directly relevant to the design flexibility option. If the final turbine model, generator type, magnet content, material composition and blade specification are not fixed, the public and the planning authority cannot properly assess the real environmental cost of the development. The applicant should not be allowed to rely on design flexibility while avoiding a project-specific assessment of materials, waste and end-of-life obligations.

The EIAR should not be accepted unless it contains a clear, enforceable and fully funded decommissioning plan for the complete removal, recycling or disposal of turbine blades, towers, nacelles, foundations, hardstands, internal roads, cabling, compounds, substation infrastructure and grid-related infrastructure. It should also identify whether turbine foundations, hardstands, roads and underground cabling would be removed or left in the upland peat environment.

The EIAR should provide a full life-cycle assessment for this specific development, including:

- the quantity of concrete, steel, copper, cabling, composite blade material and other critical materials required;
- the source, manufacturing and transport impacts of these materials;
- the carbon cost of turbine manufacture, forestry felling, peat disturbance, road building, borrow pits, grid infrastructure and construction traffic;
- the exact turbine model, generator type, magnet content and blade composition proposed;
- the expected lifespan of turbines, blades, gearboxes, generators, transformers and major components;
- the end-of-life plan for turbine blades, composite materials and specialist metals;
- the method and location for recycling, disposal or storage of turbine and grid components;
- the financial bond or legal mechanism guaranteeing full decommissioning and site restoration;
- the cumulative life-cycle impact of the wind farm, grid connection, turbine delivery route and any wider grid upgrades.

In this case, the proposed development would industrialise an upland peat and water-sensitive landscape. It would not be acceptable for the environmental assessment to focus only on claimed operational carbon savings while excluding the wider environmental chain required to manufacture, build, operate, maintain and decommission the project.

The peat, water, habitats, wildlife, landscape and community around Kiltyclogher should not be sacrificed so that the development can be described elsewhere as clean or green. For these reasons, I submit that the EIAR has not adequately demonstrated the full environmental cost of the proposed development. Permission should be refused unless and until a complete, project-specific life-cycle, materials, waste, grid and decommissioning assessment is provided and independently examined.

18. Wind Energy Ireland Public Attitudes Monitor 2022 - Inadequacy as Evidence of Local Acceptance or Lack of Community Impact

I submit that the Wind Energy Ireland Public Attitudes Monitor, December 2022, cannot be relied upon as evidence that the proposed Lissinagroagh Wind Farm would be accepted by the local population or that towns and villages will not be affected by the wind industry.

The report was prepared for Wind Energy Ireland, which the document itself describes as the representative body for the Irish wind industry with a remit to promote wind energy. It is therefore an industry attitude survey, not an independent assessment of the social, landscape, tourism, health or community effects of this specific development.

The report measures broad attitudes to wind power in Ireland. It does not measure informed local opinion on fourteen turbines of 180 m to 185 m on Dough Mountain and adjoining uplands. It does not ask respondents about turbines of this scale, a permanent 100 m meteorological mast, upland peat excavation, forestry removal, haul roads, borrow pits, hydrology, protected habitats, Hen Harrier, tourism, cultural heritage, visual dominance, night-time aviation lighting, shadow flicker, noise, or cumulative effects with other wind farms.

The distinction between general support for wind energy and acceptance of a specific local industrial wind farm is essential. A person may support renewable energy in principle while still objecting to an inappropriate wind farm in an unsuitable landscape. The survey does not test this distinction.

The report states that 80% nationally are favourable to wind power and that 85% of rural residents are favourable to wind power. However, this is a general question about wind power in the Republic of Ireland. It cannot be translated into support for this particular proposal. When the question changes to having a wind farm in the respondent's "local area," the level of support falls to 58% nationally and 56% among rural residents. This means that a very substantial proportion of people are either opposed, neutral or not clearly in favour when the development becomes local.

The rural sample is also limited. The report refers to 333 rural interviews and identifies a margin of error for rural residents of approximately 5%, with only changes of plus or minus 6% being significant. This rural sample is not evidence of acceptance by the specific affected communities

around Dough Mountain, Kiltyclogher, Glenfarne, Manorhamilton, Rossinver, Lough Melvin or the wider upland border landscape.

The report does not show that respondents had any lived experience of 185 m turbines. Many older wind farms in Ireland were built with much smaller turbines. The visual, acoustic, shadow, aviation-lighting and landscape effects of 185 m turbines on an upland ridge are not comparable to general public awareness of wind energy. The survey does not demonstrate that people understood the height, scale, turbine spacing, rotor diameter, landscape dominance or cumulative industrialisation associated with the proposed development.

The report also fails to assess the effect on towns and villages. Towns and villages do not have to be within a narrow distance band of a turbine to be affected. A wind farm of this scale can affect a community through its visual dominance over the mountain backdrop, loss of rural character, altered sense of place, reduced tourism value, impact on walking routes, river walks, heritage tours, caravan parking areas, holiday accommodation, small-scale farming, wildlife tourism and the general attractiveness of the area.

Kiltyclogher and the surrounding communities rely on landscape, heritage, wildlife, farming, culture and tourism. Dough Mountain is not an empty industrial zone. It forms part of the setting of the village and the wider upland landscape. A national industry poll cannot lawfully or logically replace a proper local assessment of those impacts.

I therefore submit that the Wind Energy Ireland Public Attitudes Monitor should be given little or no weight in determining the acceptability of this development. It does not assess this site, this community, this turbine height, this landscape, this hydrology, this tourism economy, or this rural population. It cannot be used to suggest that the public supports the Lissinagroagh Wind Farm or that nearby towns and villages will not be affected by the wind industry.

19. Appendix 1-5 Community Engagement Report - Shortcomings as Evidence of Public Acceptance or Lack of Community Impact

I submit that Appendix 1-5, described as the Community Engagement Report, should not be treated as evidence of public acceptance or informed public opinion. It is a developer-prepared engagement report, not an independent public-opinion survey.

The proposed development is not a minor local project. It consists of fourteen industrial wind turbines with a blade tip height range of 180 m to 185 m, a permanent 100 m meteorological mast, new and upgraded access tracks, drainage works, watercourse crossings and associated infrastructure. The scale of this proposal is therefore of direct relevance not only to immediate neighbouring houses but to the wider rural population, nearby villages, tourism routes, heritage landscapes and town communities that view and use Dough Mountain and the surrounding uplands.

The report states that there was "very active and extensive community engagement" and that the project team was satisfied that it had "achieved and surpassed" its objectives. However, the figures relied on do not support such a conclusion. The report records only 41 attendees at community engagement clinics. Website visits, virtual exhibition visits, school sponsorship,

brochures, media notices and engagement with elected representatives do not amount to a statistically valid public-opinion assessment. They do not show how many people support the development, how many oppose it, how many did not know about it, how many could not attend, or how many were unable to access online information.

The report also fails to assess those who were effectively excluded from meaningful participation. In a rural county, reliance on websites, local newspapers, appointment-based clinics and a limited venue can disadvantage elderly people, people with disabilities, people without transport, people without internet access, people who do not buy local newspapers, and people who live outside the immediate leaflet-drop area but who are still affected by the development.

The report itself confirms that serious concerns were raised by members of the public, including noise, low-frequency noise, health effects, hydrology, missing streams and springs, visual impact, tourism, archaeology, cultural heritage, landslides, property prices and the adequacy of community engagement. These concerns are not peripheral. They go to the core suitability of the site and the adequacy of the Environmental Impact Assessment.

I further submit that the report does not demonstrate that the community engagement team, or the public information process, had sufficient proven experience of the real-world impact of 185 m wind turbines on small rural towns, villages and upland communities. Experience in forestry, communications, community benefit funds or general renewable-energy development is not the same as demonstrated experience of assessing how turbines of this height affect daily life, residential amenity, tourism, heritage, landscape character and community identity in a sensitive upland border area.

The Population and Human Health assessment is also too narrow. It identifies properties within 2 km and states that the study area may be extended where population centres, receptor density or local considerations require it, but for this proposal the 2 km radius was not extended. That is inadequate. The impact of fourteen 185 m turbines on Dough Mountain cannot be confined to a 2 km housing exercise. Town and village populations may be affected through landscape domination, tourism loss, cultural and heritage impacts, shadow flicker perception, night-time aviation lighting, noise concerns, loss of rural amenity, altered sense of place and the industrialisation of the mountain backdrop.

Kiltyclogher, Manorhamilton, Glenfarne and the wider surrounding population do not have to live within 2 km of a turbine to be affected by this industry. Dough Mountain is part of the visual, cultural, ecological and tourism setting of the area. The Community Engagement Report does not properly assess that wider community impact and should not be relied upon as evidence that the population has been adequately informed, consulted or unaffected.

For these reasons, I submit that the Community Engagement Report is inadequate, developer-led, non-independent and incapable of demonstrating either public acceptance or the absence of significant effects on nearby towns, villages and rural communities.

20. Photographic Evidence of Site Unsuitability

I submit that my photographs support my statement that Dough Mountain, Saddle Hill, Thur Mountain and the surrounding upland environment are not suitable for wind farm development.

The photographs show the real physical conditions on and around the proposed wind farm site, including upland bog, peat, exposed peat faces, steep slopes, water channels, forestry on peat, storm-damaged forestry, bog movement, caves, karst features, swallow holes, flash-flood channels, sensitive habitats, open mountain landscape and the wider visual setting of Kiltyclogher and Lough Melvin.

These photographs are important because they show conditions on the ground that cannot be fully understood from desk-based maps, photomontages or technical drawings. They show that the proposed development is not located in a simple commercial forestry site, but in a complex upland peat, hydrology, karst, forestry, habitat and landscape system.

The photographs also support my concern that the EIAR underestimates the practical difficulty and environmental risk of constructing fourteen 185 m turbines, a permanent 100 m meteorological mast, access roads, crane hardstands, borrow pits, drainage works, watercourse crossings, grid infrastructure and construction compounds in this location.

In particular, the photographs support concerns regarding:

- peat instability and visible bog movement;
- exposed peat and erosion risk;
- steep upland slopes and flash-flood channels;
- high-density surface water drainage;
- caves, swallow holes and karst uncertainty;
- forestry planted on peat and storm-damaged trees;
- sensitive upland bog and heath habitat;
- protected wildlife habitat and bird use;
- visual impact on Kiltyclogher, Lough Melvin and the wider landscape;
- the unsuitability of the terrain for major industrial infrastructure.

I ask the Board to treat these photographs as direct local evidence of the receiving environment. They demonstrate that the site is environmentally sensitive, physically constrained and unsuitable in principle for an industrial wind farm of any scale.

Photographic Evidence - Curlews Feeding at Lough MacNean

Photograph C1 - Curlews feeding on a sandbank at Lough MacNean. This photograph is included as local evidence that the wider receiving environment supports sensitive bird species and that the assessment of the proposed Lissinagroagh Wind Farm should not be confined narrowly to turbine locations or the red-line site boundary.

I also rely on photographic evidence of Curlews feeding on a sandbank at Lough MacNean. This supports my concern that the receiving environment includes wider lakes, wetlands, river corridors and feeding areas used by sensitive bird species. The EIAR should assess not only birds recorded at turbine locations, but also the wider functional landscape used by protected and vulnerable species across Lough MacNean, Lough Melvin, Dough Mountain, surrounding uplands, river corridors and associated wetland habitats.

This photograph is relevant to my objection because Lough MacNean is part of the wider ecological and hydrological context that should be considered when assessing impacts on birds, water quality, peat movement, catchment connectivity and cumulative effects. It reinforces the need for a wider, functional landscape assessment rather than a narrow turbine-footprint assessment.

21. Conclusion and Request for Refusal

For all of the reasons set out above, I ask An Bord Pleanala to refuse permission for Lissinagroagh Wind Farm.

The site is unsuitable in principle because of its upland blanket bog, peat instability risk, karst hydrology, steep slopes, high rainfall, sensitive watercourses, connection to Lough Melvin SAC, protected species, Hen Harrier nesting and foraging activity, Dough Mountain NHA context, heritage features, community impacts, tourism impacts, landscape harm, incomplete grid assessment, EirGrid route constraints regarding woodlands and bogs, the unresolved permanent mast issue and cumulative impact with Faughery Wind Farm.

The EIAR and NIS do not provide sufficient certainty that the project would avoid significant adverse effects. The absence of complete information, testing or records is not evidence of no risk. In this location, uncertainty must weigh against consent.

My photographic evidence supports this conclusion by showing the actual ground conditions, peat, slopes, water channels, forestry damage, bog movement, karst features, sensitive habitats and landscape setting which make this location unsuitable for wind farm development.

The unresolved grid capacity, export route and wider North West reinforcement position further confirms that the application is premature. The Board should not approve the wind farm first and leave the grid, route-specific environmental surveys and cumulative grid impacts to be resolved later.

The scoping defect in the soils, geology and hydrogeology assessment further supports refusal. The assessment should not have primarily focused on the wind farm site where Dough Mountain is an upland peat, karst, groundwater and surface-water source area draining towards sensitive rivers, lakes, SACs, farms, homes and cross-border waters. The failure to complete proper dye tracing and karst investigations before consent means that the full receiving environment has not been proven, surveyed or assessed.

I respectfully request that An Bord Pleanala refuse permission for the proposed Lissinagroagh Wind Farm under Main Planning Application Number PAX12.324290, including the associated Wind Farm Application Reference ACP-323048-25, Design Flexibility and 10-Year Permission Reference ACP-323910-25, and the separate Grid Connection Reference ACP-323353-25. The current wind farm, design flexibility/10-year permission and grid connection should be considered together because they form part of one overall project with connected environmental effects.

Appendix A - FOI / AIE / Correspondence Index

Ref	Document / Evidence	Why attach it
A1	IFI FOI reply, 18 February 2022, stating no site visit had yet been undertaken	Shows limited fisheries assessment and lack of early site verification
A2	IFI correspondence warning against watercourse diversion or increased flow speed	Supports hydrology and fisheries concerns
A3	Coillte AIE 20240086 response	Shows lack of Coillte bog/soil movement policy, maps or records
A4	Leitrim County Council / Bernard Greene correspondence, 5 June 2026, on project splitting	Shows official position on separate wind farm/grid processes and separate submission fees
A5	EirGrid / Connell McLoone correspondence or information request	Supports concerns about grid connection, capacity and lack of information
A6	FuturEnergy response stating it is not subject to AIE	Shows difficulty obtaining environmental information
A7	Leitrim County Council 2021 mast Further Information letter	Shows previous planning concerns and mast history
A8	Refusal of 100 m met mast application	Supports planning history and credibility concerns
A9	29 June 2022 ABP / developer withdrawal or design alteration email	Shows long project history and changing design
A10	Any EPA / IFI / NPWS / Uisce Eireann / Donegal County Council correspondence	Shows statutory body concerns or absence of full consultation
A11	2019 Kiltyclogher Heritage Centre multi-agency meeting notes, if available	Links tomb, cave, water flow and official awareness
A12	Any FOI/AIE records on turbine delivery route	Shows whether route impacts were assessed
A13	EirGrid Powering Up the North West Project Overview, September 2025, Route Options, page 10. Source: https://cms.eirgrid.ie/sites/default/files/publications/Powering-Up-the-Northwest-Project-Overview-September-2025.pdf	Shows EirGrid route constraints, including avoiding towns and villages, maximising distance from houses and avoiding environmental sensitivities such as woodlands and bogs.
A14	Correspondence or public information showing Powering Up the North West is at Stage 4 of a six-stage project	Supports the objection that the grid process is incomplete and landowner negotiations/final routing are unresolved.

Appendix B - EIAR / Planning Document Index

Ref	Document / Evidence	Why attach it
B1	EIAR project description showing 14 turbines, 185 m height and 10-year permission	Establishes scale and duration
B2	EIAR section confirming grid connection is not included / separate reference ACP-323353-25	Supports project-splitting argument
B3	EIAR / NIS hydrology section stating karst tests have not taken place	Central evidence for uncertainty
B4	EIAR geology / peat / landslide sections	Supports peat instability objection
B5	GSI landslide susceptibility map/extract	Independent evidence of ground risk
B6	EIAR drainage maps and watercourse maps	Show connection to Sraduffy, County River, Lattone River and Lough Melvin
B7	EIAR biodiversity / ornithology section confirming Hen Harrier nesting pairs	Central protected-species evidence
B8	EIAR mitigation sections for Hen Harrier habitat loss	Shows acknowledged impact
B9	Faughery Wind Farm bird surveys 2015, 2017 and 2019	Shows Hen Harrier activity in the wider Dough Mountain area
B10	Faughery carcass search / post-construction monitoring records, if available	Relevant to operational collision and displacement risk
B11	Faughery 2014 water monitoring reports and lab certificates	Shows karst features and limits of monitoring
B12	EIAR traffic chapter	Compare with actual likely heavy vehicle movements
B13	EIAR landscape and photomontage chapter	Challenge representativeness of viewpoints
B14	EIAR consultation chapter	Challenge adequacy of appointment-only Rossinver consultation
B15	EIAR cumulative impact chapter	Challenge failure to fully integrate Faughery and nearby proposals
B16	EIAR alternatives/layout evolution chapter	Shows design changes over time
B17	ACP-323910-25 design flexibility material	Supports objection to uncertain final design
B18	Leitrim County Development Plan wind energy map / grey zones	Shows turbines/borrow pits/compounds outside or near approved study areas
B19	Dough / Thur Mountains NHA Site Synopsis, Site Code 002384	Supports upland blanket bog and habitat argument
B20	Lough Melvin SAC Site Synopsis / conservation objectives	Supports downstream Natura impact argument
B21	2021 temporary 100 m meteorological mast application, Further Information request and refusal record	Shows the mast planning history and why the current permanent mast proposal must be assessed carefully.

B22	Current EIAR/planning extracts describing the permanent meteorological mast and its location	Shows that the current mast differs from the 2021 temporary mast application and must be included in cumulative assessment.
B23	EirGrid Powering Up the North West Project Overview route constraints extract	Supports the argument that bogs and woodlands are environmental sensitivities to be avoided, not treated as suitable for major wind farm infrastructure.
B25	EIAR assessment of operational turbine wake effects, turbulence, microclimate, air, peatland hydrology and biodiversity	To show whether the applicant has assessed wake turbulence, artificial cross-turbulence, microclimate, fog, humidity, soil moisture, peatland drying and ecological effects across the full Dough Mountain upland.
B26	Newsletter 1 and Newsletter 2 project material showing or referring to Dough Mountain within the wider project area	To support the point that the public understood Dough Mountain as part of the environmental setting, while the later Planning Application Study Area was reduced.
B27	Scientific research on wind turbine wake turbulence, peatland microclimate and wind-farm effects on temperature, humidity, soil moisture and carbon cycling	To support the objection that operational effects are not confined to turbine bases and require site-specific assessment on an upland peat mountain.

- An Bord Pleanala Croagh Wind Farm refusal extracts - peat, landslide, hydrology, repositories, water crossings, forestry clearance, drainage and upland bog risk pointers relevant to Lissinagroagh.
- GSI landslide susceptibility mapping and historical landslide mapping for the Lissinagroagh / Dough Mountain / Saddle Hill area.
- Peat repository, spoil management, borrow pit and access road drawings, including any retaining buttresses or engineered containment areas.
- Drainage design drawings showing all natural and man-made water channels, crossings, crossing upgrades, outfalls, settlement ponds and discharge points.
- Croagh Wind Farm and Lissinagroagh Wind Farm comparison note - planning comparison showing repeated peat, landslide, drainage, forestry clearance, spoil management, water crossing, habitat and landscape risk factors.

B25. EirGrid Powering Up the North West Project Overview, September 2025 - route status, route constraints and grid reinforcement context.

Purpose: Supports the objection that the grid/export route is not finally selected, that EirGrid seeks to avoid towns, villages, houses, woodland and bogs, and that route-specific bird, bat, watercourse, peat, hydrology, habitat, cultural heritage and traffic assessments are required before the project can be treated as complete.

B26. Renewable constraint, curtailment and grid capacity evidence from EirGrid, Wind Energy Ireland, WindEurope and relevant academic/national sources.

Purpose: Supports the objection that the application is premature because the North West grid requires reinforcement and the wind farm should not be assessed separately from the electricity export route and wider grid works needed to make it operational.

- B25 Garvagh Glebe peat slide emergency response, Forest Service correspondence and turbulence felling records.

Appendix C - Photograph and Map Index

Purpose: To support the observer's statement that the receiving environment is not suitable for wind farm development and is unsuitable in principle for an industrial wind farm of any scale.

- Photographs of visible bog slippage and exposed peat on the lower end of the upland bog adjacent to the road to Kiltyclogher.
- Photographs of steep gorges, flash flood channels, swallow holes, marsh ground, caves and borrow pits within and surrounding the Study Area.
- Photographs of Storm Eowyn and other storm-related tree fall, especially around T7 and T8.
- Panoramic view photographs showing Lough Melvin, Saddle Hill, Shenaun, Farbreague, Sligo Bay, Truskmore, Conway North, Tievebaun, Benwiskin, Gortnagarn, Lackagh Mountain, Manorhamilton, Bembo Mountain, Naweeloge Top, South Leitrim, Fawley Falls, Donegal Bay, Kinlough, Bundoran, Barnsmore Gap, the Donegal Mountains, Garrison, Belles, Glenfarne, O'Donnell's Rock, Arroo Mountain and Cuilcagh Mountain.

Ref	Document / Evidence	Why attach it
C1	Dough Mountain / Thur Mountain skyline from Kiltyclogher	Landscape and tourism impact

C2	Proposed caravan parking view facing mountain	Direct community/tourism impact
C3	Kiltyclogher Heritage Centre / Sean Mac Diarmada tour material	Heritage and tourism evidence
C4	River walk / County River / Sraduffy River photographs	Community amenity and hydrology
C5	County River flooding entering Lough Melvin, dated 30 January 2026	Flash flooding and downstream risk
C6	Sraduffy River route map	Correct hydrological pathway from Dough Mountain
C7	Lattone River / County River confluence map	Shows connection to Lough Melvin
C8	Lough Melvin SAC proximity map	Natura and fisheries impact
C9	Cave / swallow hole / fast-flowing water feature photographs	Karst and monitoring uncertainty
C10	Neolithic tomb / Tullyskeherney National Monument photographs	Heritage and landscape impact
C11	Upland bog / peat / heather photographs	Shows active upland habitat
C12	Bog cotton at Saddle Hill / T2-T3 area	Supports peatland habitat evidence
C13	Exposed peat faces / peat erosion / bog cutting photographs	Supports peat instability risk
C14	Steep slope photographs with camera held level	Shows terrain risk better than maps
C15	Water channels / ravines / flash flood channels	Supports hydrology and erosion risk
C16	Proposed T5 slope / Dough summit view	Turbine-specific terrain evidence
C17	Proposed T7, T8, T13, T14 views towards Dough/Tawnylust Barr	Turbine-specific landscape and habitat evidence
C18	Proposed T9 and T10 site photographs	Supports Hen Harrier and mast-area concerns
C19	Refused mast site / solar panels / cleared works photographs	Planning history and premature works
C20	Female Hen Harrier photograph	Protected raptor evidence
C21	Hen Harrier sighting locations map	Show use of T7/T9/T10/T13 and wider upland
C22	Hare near T6/T4	Local biodiversity evidence
C23	Whooper Swans / Buzzards / wildlife photos, if available	Tourism and biodiversity
C24	Net1 mast photograph	Telecommunications and emergency resilience
C25	ESB lines through Coillte forestry / storm damage photographs	Infrastructure resilience
C26	Narrow local roads / timber haulage photographs	Traffic and construction impact
C27	Borrow pit locations, especially near Lisdarush	Excavation, spoil and peat risk
C28	10 m contour map	Shows slope and upland terrain

C29	Study Area boundary vs townlands map	Shows excluded/edge areas
C30	Leitrim wind energy study area map	Shows relationship to County Development Plan
C31	Faughery Wind Farm and proposed Lissinagroagh overlay map	Cumulative impact
C32	Photos of Lough Melvin, Dean's Lake, Owanmore/Lough Gill if available	Downstream water sensitivity
C33	Bembo Mountain / wider border upland skyline photographs, if available	Supports wider landscape and cumulative visual impact.
C34	2021 temporary 100 m mast site photographs, including site clearance and solar panels	Shows mast planning history and previous works.
C35	Current permanent mast location map/photographs	Shows the changed location and cumulative impact with the fourteen turbines.
C36	Map showing turbines positioned north-west, west, south and south-east of Dough Mountain	To show the potential for repeated artificial cross-turbulence across the mountain under different wind directions.
C37	Dough Mountain plateau / upland peat / surface-water photographs	To show that the mountain is an extensive connected upland peat and surface-water system, not a small isolated bog edge.
C38	Views from Dough Mountain and surrounding slopes showing fog, low cloud, forestry edge, heath, water channels and exposed upland airspace	To support the need for site-specific turbulence and microclimate assessment.

- Photographs showing Dough Mountain, Saddle Hill, Thur Mountain, upland bog, exposed peat, bog movement, steep slopes, water channels, caves, karst features, forestry on peat, storm damage, wildlife habitat, turbine locations, mast location, views from Kiltyclogher, Lough Melvin and the wider landscape.
- Photograph C1 - Curlews feeding on a sandbank at Lough MacNean, showing that the wider receiving environment includes lakes, wetlands and bird feeding areas that should be assessed as part of the functional landscape and catchment context.

Appendix D - Life-Cycle, Waste and Decommissioning Evidence

- Transcript/extract: "The Dark Side of Green Energy" - relied on for the principle that renewable infrastructure should be assessed across the full system, including raw materials, manufacturing, transport, waste and decommissioning.
- Applicant material quantities schedule, if available - concrete, steel, copper, cabling, composite blade materials, foundations, hardstands and grid components.
- Decommissioning plan and financial bond/legal guarantee for turbine blades, towers, nacelles, foundations, access roads, hardstands, cabling, substations and grid-related infrastructure.
- Design flexibility details - final turbine model, generator type, magnet content, blade composition, recycling method and end-of-life destination.

- Life-cycle carbon assessment covering manufacture, transport, forestry felling, peat disturbance, road building, borrow pits, grid connection and decommissioning.

Appendix E - Wind Energy Ireland Public Attitudes Monitor Evidence

- Wind Energy Ireland Public Attitudes Monitor, December 2022 - to be attached as an industry attitude survey which should be challenged, not relied upon as proof of local acceptance.
- Marked extract showing the report is prepared for Wind Energy Ireland, the representative body for the Irish wind industry with a remit to promote wind energy.
- Marked extract showing national favourability figures, rural sample size, rural margin of error and the reduced support when the question concerns a wind farm in the respondent's local area.
- Local evidence bundle showing that the survey does not assess Kiltyclogher, Dough Mountain, Lough Melvin, tourism, heritage, 185 m turbines, the permanent 100 m mast, peat excavation, Hen Harrier, shadow flicker, night lighting, hydrology or cumulative effects.

Appendix F - Appendix 1-5 Community Engagement Report Evidence

- Appendix 1-5 Community Engagement Report - to be attached as a developer-prepared engagement report, not an independent public-opinion survey.
- Marked extract showing the report claims "very active and extensive community engagement" and that the project team considered its objectives achieved and surpassed.
- Marked extract showing only 41 attendees at community engagement clinics, with website visits, virtual exhibition visits and other developer-led communications not proving informed acceptance.
- Marked extract listing public concerns about noise, low-frequency noise, health, hydrology, missing streams and springs, visual impact, tourism, archaeology, cultural heritage, landslides, property prices and adequacy of engagement.
- Marked extract from Population and Human Health assessment showing the 2 km focus and the statement that the study area may be extended for population centres or local considerations, but was not extended for this proposal.
- Local evidence bundle showing the wider affected communities, including Kiltyclogher, Manorhamilton, Glenfarne, tourism routes, heritage sites, caravan parking area, river walks, caving and landscape views of Dough Mountain.

Appendix G - Soils, Geology, Hydrogeology, Study Area and Karst Evidence

- TOBIN scoping report, Section 7.2 Study Area - extract stating that the EIAR study area for soils, geology and hydrogeology will primarily focus on the wind farm site, with adjacent lands and downstream environs considered to an appropriate extent.
- Marked extract identifying karst features within the limestone bedrock formation, blanket peat, Dough/Thur Mountains NHA, Lough Gill SAC, Lough Melvin SAC and Northern Ireland Lough Melvin SAC as relevant receptors.
- GSI landslide susceptibility mapping showing moderate to high susceptibility in central and northern parts of the study area, together with local photographs of bog movement, exposed peat, steep slopes and flash-flood channels.
- Karst, cave, swallow hole, spring and groundwater evidence, including the Tullyskeherney cave/water feature and Faughery water monitoring material identifying a swallow hole and spring.
- Evidence that dye tracing and full karst connectivity investigations were not completed before the EIAR/NIS and mitigation conclusions were finalised.
- Purpose: To support the objection that the soils, geology and hydrogeology assessment is fundamentally deficient because the receiving environment should have been defined by hydrological, geological, peatland, karst, ecological and downstream pathways, not primarily by the wind farm site boundary.

Appendix H - Marsh Fritillary, Bird, Bat and Cumulative Effects Evidence

Include targeted Marsh Fritillary habitat/larval web survey evidence or note absence of such surveys; Faughery Wind Farm bird survey extracts from 2015, 2017 and 2019; Hen Harrier sighting records; bat survey evidence; maps showing turbines, access roads, drainage, forestry clearance, grid route, turbine delivery route and replacement forestry lands; and evidence of cumulative effects with Faughery Wind Farm, mast works, forestry operations and grid/export infrastructure.

Purpose: To show that the EIAR has not adequately assessed the full biodiversity and cumulative zone of influence, including Marsh Fritillary, Hen Harrier, bats, bird displacement, habitat fragmentation, peatland ecology and the combined effects of the wind farm, grid connection, mast, roads, borrow pits, drainage, forestry clearance and turbine delivery route.

Appendix H/X - Recharge News / Cosmo Sanderson wind-wake article and image. Source: Cosmo Sanderson, Recharge News, 30 September 2024, article on wind-farm wake effects and wake losses. Purpose: Supports the point that wind-farm wake turbulence is a recognised operational issue and that the EIAR should have provided site-specific wake, turbulence and microclimate assessment for Dough Mountain. The image should be attached with source, author and date clearly acknowledged, and used only as supporting evidence for criticism and review of the EIAR.

Suggested Attachment Bundle Order

1. Main written objection.
2. One-page summary of key refusal reasons.
3. FOI/AIE correspondence bundle.
4. EIAR extract bundle with highlighted passages.
5. Hydrology / karst / water map bundle.

Appendix I - Weather, Climate Change, Rainfall, Storm and Leitrim Risk Evidence

Sources include Met Eireann material confirming 2023 as Ireland's wettest and warmest year on record; Met Eireann Annual Climate Statement for 2025; Met Eireann Climate Statement for January 2026; Met Eireann Storm Eowyn material; EPA material on projected increases in heavy precipitation; and the County Leitrim Climate Change Risk Assessment.

Purpose: Supports the submission that the proposed wind farm is located in a climate-sensitive upland environment where high rainfall, prolonged wet periods, flash flooding, severe windstorms, forestry windthrow, peat movement, drought, fire risk, drainage failure, access disruption and changing climate baselines must be assessed with a precautionary approach.

6. Peat / landslide / geology bundle.
7. Hen Harrier / ornithology bundle.
8. Faughery Wind Farm comparison bundle.
9. Community / tourism / Kiltyclogher bundle.
10. Heritage / cave / tomb bundle.
11. Photo appendix, labelled by location and turbine number.
12. Wind Energy Ireland Public Attitudes Monitor rebuttal bundle.
13. Appendix 1-5 Community Engagement Report rebuttal bundle.
14. Soils, geology, hydrogeology, karst and dye-testing study area defect bundle.

Appendix J - Garvagh Glebe Peat Slide, Turbulence Felling and River-Risk Evidence

Documents include:

- AGEC Ltd, August 2009, Peat Slide Emergency Response Plan for Rivers at Risk from Peat Failure as a Result of Tree Felling Operations - Garvagh Glebe Wind Farm.
- Forest Service correspondence regarding Coillte GFL application for Garvagh Glebe turbulence felling.
- Forest Service / Sligo-Leitrim bog slide correspondence.
- Coillte Resource Management, Turbulence Felling for Garvagh Glebe Wind Farm, 20 April 2009.

Purpose: Supports the submission that peat slide, forestry felling, turbulence felling, water quality, river risk, soil stability, SAC/SPA/NHA screening, worker isolation, emergency rescue, pollution barriers, monitoring difficulty and cumulative effects are known and documented risks in Coillte upland wind farm forestry settings in County Leitrim. This evidence is directly relevant to the proposed Lissinagroagh Wind Farm on Dough Mountain.

Leitrim County Council Scoping Response, Site and Surrounding Area, and Grid Route Uncertainty

Leitrim County Council Scoping Response Confirms the EIAR Had to Assess the Full Receiving Environment, Peat Risk, Material Storage and Grid Infrastructure

I submit that the Leitrim County Council scoping response of 27 January 2025 is highly significant because it confirms that the applicant and its consultants were expressly warned of the matters that had to be fully assessed in the EIAR.

TOBIN's consultation email of 3 December 2024 stated that the proposed Lissinagroagh Wind Farm would involve all associated infrastructure including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110 kV electrical substation and an underground grid connection. This confirms that the project being scoped was not limited to turbine bases. It included grid infrastructure, borrow pits, hardstands, access tracks and all associated infrastructure.

Leitrim County Council's response required the EIAR to include all areas that would be impacted directly or indirectly by the proposed development. The Council stated that the information in the EIAR should be based on comprehensive surveys of the area and should accurately describe the receiving environment in terms of geology, geomorphology and hydrology, as well as the physical site proposed for development.

This directly supports my objection that the EIAR cannot be treated as adequate if it mainly confines assessment to the wind farm site or defined Study Area. Dough Mountain is an upland peat, forestry, karst and hydrological source area. The receiving environment includes rivers, streams, drains, springs, swallow holes, caves, downstream catchments, Lough Melvin SAC, Lough Gill SAC, the Dough/Thur Mountains NHA, local watercourses, forestry lands, grid infrastructure and surrounding lands that may be affected directly or indirectly.

The Council also required assessment of materials storage and containment within the site. It required information on the nature, quantities and source of materials to be used, the volumes and nature of waste materials likely to be generated during construction, and the proposed means of disposal or relocation within the site boundary. This is directly relevant to the proposed borrow pits, peat/spoil movement, stone and rock fill, repository capacity, emergency stone supply, storage constraints, and the ability to contain material in an upland peat and water-sensitive environment.

In my submission, the applicant cannot meet this requirement unless it can scientifically quantify the amount of peat, bog material, saturated soil, spoil, stone, rock fill and emergency material required for the full project. If the company cannot be certain of the amount of bog and peat to be moved to the borrow pits, then it cannot scientifically quantify the effects of that movement, the capacity of the borrow pits, the stability of stored material, the drainage burden, the number of barriers required, or the risk to watercourses.

Leitrim County Council also required the EIAR to assess the vulnerability of the project to major accidents and disasters relevant to the project. This is directly relevant to peat failure, bog movement, landslide, flash flooding, karst pollution, forestry windthrow, storm damage, emergency access failure, worker isolation and pollution entering watercourses. These matters cannot be left to a general construction management plan or emergency response plan after permission is granted.

The Council specifically identified the need to assess impact on peat stability and to provide a robust geotechnical assessment of potential for peat slippage. It also required assessment of impacts on water quality, ecology, soil, hydrology, groundwater, ground conditions and geology. These are the

same issues raised by the Garvagh Glebe peat-slide material, the Croagh Wind Farm refusal, the Shass Mountain peat slide and my local photographic evidence.

The Council further noted that the GSI landslide susceptibility mapping identified the central and northern part of the study area as moderate to high in landslide susceptibility. This is a serious warning. The Council directed TOBIN to examine recent Leitrim wind farm refusals carefully in relation to landslide susceptibility, landslide history, tension cracks, rainfall, upland and sloping site conditions, the density of drainage channels, peat and spoil volumes, storage and management of material, peat depth and nature, drainage impacts, and pollution risk to waterbodies.

This means the applicant was on notice before the EIAR was finalised that landslide, peat, drainage, spoil, storage, hydrology, water quality and previous refusal issues were central matters. These were not late concerns raised only by objectors. They were expressly identified by the Planning Authority during scoping.

Leitrim County Council also referred to the 2020 Shass Mountain peat landslide and stated that, given the proximity and severity of that event, significantly robust and extensive geotechnical and hydrogeological investigations should be undertaken and documented in the EIAR, with conclusions underpinned by the precautionary principle. This strongly supports my submission that the EIAR cannot rely on narrow study-area assumptions, incomplete bog movement records, or post-consent monitoring.

In my submission, the final EIAR should be tested against the Council's scoping requirements. If the EIAR has not fully assessed all direct and indirect receiving environments, the grid connection, borrow pits, material quantities, waste volumes, peat/spoil storage, emergency risks, landslide susceptibility, hydrology, hydrogeology, drainage changes, climate impacts and cumulative effects, then it has not complied with the very matters identified by the Planning Authority at scoping stage.

The Council's scoping response supports refusal because it confirms the seriousness of the receiving environment and the level of assessment required. On the evidence now available, the EIAR has not provided the necessary certainty that this development can be constructed and operated without unacceptable risk to peat stability, watercourses, karst, downstream SACs, habitats, fisheries, local communities and the wider North Leitrim catchment.

TOBIN's Own Scoping Email Confirms Surveys Were Required at the Site and Surrounding Area

I submit that TOBIN's own scoping consultation email of 3 December 2024 is highly significant. In that email, TOBIN stated that detailed surveys and studies were being undertaken at the site and surrounding area.

This wording matters. It confirms that the applicant and its consultants understood at scoping stage that the environmental assessment could not be confined to the turbine bases, internal roads or a narrow red-line boundary. The surrounding area was part of the assessment context from the outset.

That is directly relevant to my objection. Dough Mountain is not an isolated construction platform. It is an upland peat, forestry, karst and hydrological source area connected to surrounding lands, watercourses, gorges, springs, swallow holes, caves, downstream rivers, Lough Melvin SAC, Lough Gill SAC, Dough/Thur Mountains NHA, local communities, tourism routes and cross-border catchments.

Leitrim County Council's scoping response supports this interpretation. The Council stated that the EIAR should include all areas impacted directly or indirectly by the proposed development and that the information should be based on comprehensive surveys of the area. The Council also required

the receiving environment to be accurately described in terms of geology, geomorphology and hydrology.

In my submission, this means the EIAR should be judged against the wider survey obligation that was identified at scoping stage. If the final EIAR is mainly confined to the wind farm site, selected turbine locations, or the applicant's Study Area, then it has not followed the logic of TOBIN's own consultation email or Leitrim County Council's scoping response.

This is especially serious where the risks are landscape-wide: peat movement, slope instability, karst pollution, watercourse contamination, forestry felling, borrow pit impacts, grid infrastructure, turbine delivery, downstream hydrology, cumulative effects with Faughery Wind Farm, and impacts on Lough Melvin SAC and Lough Gill SAC.

The phrase at the site and surrounding area should therefore be treated as an admission that a wider environmental assessment was required. If comprehensive field surveys were not carried out across the surrounding Dough Mountain system, including adjacent watercourses, gorges, karst features, forestry, peatland, rivers, downstream pathways and sensitive receptors, then the EIAR cannot be accepted as a comprehensive assessment of the receiving environment.

In my submission, this supports refusal. The applicant recognised that the surrounding area was relevant, Leitrim County Council required all direct and indirect receiving environments to be assessed, but the EIAR has not demonstrated the level of comprehensive, site-and-surrounding-area assessment required for a development of this scale and risk.

Grid Connection Identified, but No Clear Statement that Surveys Extended to the Full Grid Route

I submit that TOBIN's scoping consultation email creates a serious uncertainty regarding the grid connection.

The email states that the project would involve the wind farm and all associated infrastructure, including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110 kV electrical substation and an underground grid connection. However, when the email refers to detailed surveys and studies, it states that these were being undertaken at the site and surrounding area. It does not clearly state that detailed surveys and studies were being undertaken along the full underground grid connection route.

This distinction is important. A grid connection is not a minor or optional element. It is essential infrastructure without which the wind farm cannot operate. If the grid connection was part of the project being scoped, then it should have been assessed as part of the same complete project, including ecology, hydrology, peat, watercourses, roads, traffic, landowners, cultural heritage, habitats, invasive species, construction impacts and cumulative effects.

The phrase at the site and surrounding area does not, by itself, prove that the full grid route was included in the environmental survey work. It could refer only to the wind farm site and immediately surrounding lands. If the grid route was not fixed, surveyed and assessed at that time, then the public, prescribed bodies and planning authority were not being given the full environmental picture.

This is particularly serious because Leitrim County Council's scoping response required the EIAR to include all areas that would be impacted directly or indirectly by the proposed development and to be based on comprehensive surveys of the area. If the grid connection is associated infrastructure, then lands along the grid route are directly or indirectly impacted areas and should not be excluded from the main environmental assessment.

In my submission, the applicant cannot rely on the grid connection when describing the project, but then fail to clearly demonstrate that the full grid route was surveyed and assessed as part of the EIAR. That would fragment the project and prevent a complete assessment of the real environmental effects.

This supports my objection that the EIAR is incomplete. The wind farm, substation and underground grid connection should be assessed as one complete project. If the surveys were limited to the wind farm site and surrounding area, without full grid-route assessment, then the EIAR cannot be accepted as comprehensive and permission should be refused.

Grid Connection Mentioned by TOBIN but Not Clearly Scoped by Leitrim County Council

I submit that there is a serious uncertainty in the scoping process regarding the underground grid connection.

TOBIN's consultation email of 3 December 2024 stated that the proposed development would include all associated infrastructure, including turbine foundations, hardstanding areas, borrow pits, access tracks, a 110 kV electrical substation and an underground grid connection. However, the same email stated that detailed surveys and studies were being undertaken at the site and surrounding area. It did not clearly state that surveys were being undertaken along the full extended grid route.

Leitrim County Council's scoping response required the EIAR to include all areas directly or indirectly impacted by the proposed development and to be based on comprehensive surveys of the area. It also required accurate description of the receiving environment in terms of geology, geomorphology and hydrology. However, the Council's response does not appear to specifically address the extended grid route as a separate linear project with its own landowners, watercourses, roads, habitats, ecology, archaeology, construction impacts and cumulative effects.

This is important because the grid connection is essential infrastructure. The wind farm cannot operate without it. It is therefore not a minor secondary matter. If the underground grid route was part of the project being scoped, then it should have been clearly identified, mapped, surveyed and assessed as part of the complete project.

The absence of clear reference to the extended grid route in the Council's scoping response suggests that the consultation may not have presented, or at least did not result in, a full route-specific scoping assessment of the grid connection. That means prescribed bodies, landowners and the public may not have been asked to consider the full environmental footprint of the project at scoping stage.

This reinforces my objection to project splitting. The applicant cannot describe the grid connection as associated infrastructure when introducing the project, but then proceed in a way that leaves the full grid route outside the clear scope of the main EIAR. If the grid route was not fixed, surveyed and assessed with the wind farm, then the EIAR does not assess one complete project.

The issue is not merely procedural. A grid route can affect watercourses, roadside drains, peat, hedgerows, trees, habitats, protected species, private wells, fisheries, archaeology, traffic, road safety, communities and cumulative construction impacts. If the full route has not been environmentally assessed with the wind farm, the Board cannot know the total effects of the development.

In my submission, this is a fundamental defect. The scoping material identifies an underground grid connection, but the available correspondence does not show that the extended grid route was fully scoped, fixed, surveyed or assessed as part of the same EIAR. Permission should not be granted for a wind farm where an essential part of the project remains environmentally uncertain.

Appendix K - TOBIN and Leitrim County Council Scoping Correspondence

Documents: TOBIN consultation email of 3 December 2024 to Leitrim County Council and Roads, and Leitrim County Council response to Request for Scoping, dated 27 January 2025.

Purpose: Supports the submission that the project was scoped as including turbine foundations, hardstands, borrow pits, access tracks, a 110 kV substation and an underground grid connection; that detailed surveys were described as taking place at the site and surrounding area; and that Leitrim County Council required all directly and indirectly impacted areas, comprehensive surveys, geology, geomorphology, hydrology, materials storage and containment, peat stability, landslide susceptibility, hydrology and hydrogeology to be assessed. It also supports the submission that the available correspondence does not clearly demonstrate full route-specific scoping of the extended grid connection.

Additional Evidence: AIE/FOI Correspondence, Community Engagement and 2021 Mast Further Information

The following additional section should be read with the earlier sections on project splitting, scoping, public participation, peat stability, hydrology, karst, protected birds and the suitability of Dough Mountain. It relies on correspondence and records obtained through AIE/FOI and on Leitrim County Council correspondence relating to the 2021 temporary 100 m meteorological mast application P.21/110.

Community Engagement - Leitrim County Council AIE 11/26, Item 28

I submit that the inadequacy of community engagement is confirmed by information released to me by Leitrim County Council under AIE 11/26, in its reply dated 9 June 2026. The relevant document is Item 28, which contains Leitrim County Council's response/submission on the proposed Lissinagroagh Wind Farm.

Under Section 7: Community and Public Engagement, Leitrim County Council stated: "Meaningful consultation with local stakeholders is essential to ensure transparency and address community concerns about the project's potential impacts."

Leitrim County Council further requested: "We encourage the implementation of a robust consultation process that includes workshops, public forums and transparent reporting of feedback from local communities and landowners."

This is important because it shows that the Planning Authority itself identified the need for meaningful consultation, workshops, public forums, and transparent reporting of feedback from local communities and landowners.

In my submission, that standard was not met. The consultation process for this development was limited, developer-controlled and did not provide the affected communities with a full, open and transparent opportunity to discuss the wind farm, grid connection, turbine delivery route, borrow pits, peat stability, water risks, karst, landscape impacts, tourism, roads, local homes, farming, heritage and cumulative effects.

The AIE 11/26 Item 28 material is therefore directly relevant. It confirms that meaningful engagement was not optional. It was identified by Leitrim County Council as necessary to ensure transparency and to address community concerns about the project's potential impacts.

This strengthens my objection because the developer has not demonstrated that it carried out the robust consultation process requested by the Council, including public forums, workshops and transparent reporting of feedback. That failure undermines public participation and means important local knowledge may not have been properly gathered or assessed.

2021 Temporary 100 m Mast Application P.21/110 - Further Information Request

I submit that the Further Information request issued by Leitrim County Council on 9 July 2021 in respect of planning application P.21/110 is directly relevant to the present Lissinagroagh Wind Farm application.

That application concerned a temporary 100 m meteorological mast at Boleyboy, Co Leitrim. It was not an application for fourteen 185 m turbines, borrow pits, access roads, hardstandings, peat excavation, grid infrastructure or major wind farm construction. Yet even for that smaller preliminary mast proposal, Leitrim County Council considered it necessary to request Further Information to allow proper assessment of the proposed development. The Council's letter stated that the further information requested was essential for a full and proper evaluation of the submitted planning application.

The Council requested further consideration of the impact of the proposed development on bird species including Peregrine Falcon and Chough, identified within the Sligo/Leitrim Uplands SPA. The Council accepted that the SPA was more than 11 km west of the proposed mast site and that there were no ordinary hydrological, physical or ecological pathways for direct or indirect effects. However, the Council correctly noted that these are not waterbirds and fly through the air. On that basis, the Council did not accept that the conclusion in the Appropriate Assessment Screening Statement was sufficiently precise and definitive.

This is extremely important for the present wind farm application. It shows that Leitrim County Council had already identified that protected bird species cannot be dismissed simply because a designated site is some distance away or because there is no water pathway. Birds move through the air and can be affected by tall structures, turbine collision risk, displacement, disturbance, habitat loss and barrier effects.

The Council also noted that Coillte's own newsletter for the proposed wind farm specifically mentioned Hen Harrier, a bird of prey, within the study area of the proposed wind farm development. The Council therefore requested a more thorough and detailed assessment of the proposed development on all bird species afforded protection under the Habitats Directive, to allow the Planning Authority to make a definitive determination from an Appropriate Assessment perspective.

The Planning Authority also requested clarification of the details and specifications of the proposed meteorological mast, noting that the submitted drawing referred only to a "typical meteorological mast". This is significant because the current wind farm application also relies on technical descriptions, layout drawings, turbine specifications, design flexibility and future construction detail. Where a structure is proposed, the Planning Authority is entitled to require precise details, not generic or typical descriptions.

The Planning Authority further stated that the submitted documentation had not adequately considered the ground conditions of the proposed meteorological mast. The Council noted that the documentation indicated that ground conditions would be confirmed before construction commenced. Having regard to the setting of the proposal in an area of upland bog, and in light of recent events at Shass Mountain, the Council stated that this was unacceptable. The Council therefore requested that ground conditions be adequately investigated to ensure that there was no danger of bog slippage, and that a report of such investigations, prepared by a suitably competent professional, be submitted to the Planning Authority.

Leitrim County Council also stated that it had received a significant number of submissions on the proposed mast application and invited the applicant to comment on those submissions so that an informed final assessment could be made. This shows that public submissions and local concerns were material to the planning assessment even for a temporary mast. For the current wind farm, meaningful public participation is even more essential.

Study Area, Protected Birds and Appropriate Assessment Defect

I submit that the 2021 Further Information request is highly relevant because Leitrim County Council had already identified bird, Appropriate Assessment, upland bog and ground-condition issues at the early-stage wind farm study area. The Planning Authority was not dealing with an abstract or unknown location. It had before it the mast application connected to the proposed Lissinagroagh / Dough Mountain wind farm project and was therefore aware of the general study area being promoted by Coillte/FuturEnergy at that time.

That earlier study area is important because it does not appear to be the same as the Study Area examined in the current planning application. The developer cannot use one study area for early-stage project promotion, newsletters, mast assessment and scoping, and then rely on a reduced or altered study area in the planning application if that change removes or weakens assessment of sensitive bird, peat, hydrology, karst, NHA or surrounding-environment issues.

The EIAR should clearly explain how the original study area, the mast-related study area, the scoping study area and the final EIAR Study Area relate to each other. If they differ, the EIAR should explain why, what was excluded, and whether any excluded areas contain sensitive receptors, protected bird records, hydrological features, bog, karst, watercourses or other relevant ecological information.

The 2021 Further Information request specifically raised protected bird species and required a more thorough and detailed assessment of the proposed development on all bird species afforded protection under the Habitats Directive, so that the Planning Authority could make a definitive determination from an Appropriate Assessment perspective. The Council did not ask only for a narrow review of Peregrine Falcon and Chough. It widened the issue to all protected bird species relevant to the project and expressly linked this to Appropriate Assessment.

In my submission, the EIAR and bird surveys should therefore be tested against the Council's 2021 requirement. The question is not simply whether the applicant carried out bird surveys. The question is whether the surveys and assessment properly answered the specific concern raised by the Planning Authority: whether all relevant protected bird species, including birds moving through the air from wider protected upland areas, were assessed in a way that allowed a precise and definitive Appropriate Assessment conclusion.

The bird survey should therefore explain how it addressed the Council's 2021 concerns regarding Peregrine Falcon and Chough; how it assessed birds moving through the air from the Sligo/Leitrim Uplands SPA and wider upland landscape; how it dealt with Coillte's own reference to Hen Harrier within the study area; whether the same study area referred to in 2021 was used in the final bird assessment; whether any part of the original or surrounding study area was later excluded from the planning application assessment; whether all relevant protected bird species were assessed; whether collision risk, displacement, disturbance, habitat loss, barrier effects and cumulative effects were considered; and whether the final Appropriate Assessment conclusion is genuinely precise and definitive.

If the final bird survey did not directly address the Planning Authority's 2021 concerns, then the EIAR has a serious weakness. The applicant was on notice from 2021 that bird movement through the air,

not just hydrological or physical pathways, had to be assessed. It was also on notice that Hen Harrier was already identified within the study area from Coillte's own project material.

This supports refusal because the applicant has not demonstrated that it properly addressed concerns raised by Leitrim County Council as far back as 2021 regarding the study area, protected bird species, Hen Harrier, airspace movement and the need for a precise and definitive Appropriate Assessment conclusion.

Repeated Defect: Ground Conditions and Karst Studies Deferred Until After Consent

I submit that the 2021 correspondence on planning application P.21/110 is directly relevant to the present Lissinagroagh Wind Farm application because it shows that Leitrim County Council had already rejected the practice of deferring critical ground investigations until after consent.

In the 2021 temporary 100 m meteorological mast application, the Planning Authority noted that the submitted documentation had not properly considered the ground conditions for the proposed mast. The Council further noted that the information indicated ground conditions would be confirmed before construction commenced. Having regard to the siting of the proposal in an area of upland bog, and having regard to the recent events at Shass Mountain, the Planning Authority stated that this approach was unacceptable.

This is a crucial planning point. Leitrim County Council did not accept that ground conditions could be left to be confirmed after permission, even for a temporary 100 m mast. The Council required the applicant to adequately investigate the ground conditions in advance, to ensure that there was no danger of bog slippage, and to submit a report by a suitably competent professional before the planning application could be properly assessed.

In my submission, TOBIN and the applicant have repeated the same defective approach in the current planning application for the fourteen-turbine wind farm. The current application is far larger, more permanent and more environmentally risky than a temporary mast. It involves fourteen turbines up to 185 m high, turbine foundations, crane hardstands, access roads, borrow pits, drainage works, forestry felling, peat excavation, spoil management, a permanent 100 m mast, a substation, grid infrastructure and construction across an upland peat, forestry, karst and hydrological source area.

The same principle applies with even greater force to the karst issue. The applicant cannot state or imply that critical karst studies, dye tracing, groundwater connectivity investigations, or final ground-condition confirmation can be completed after planning permission. These matters go to the heart of whether the proposed development is environmentally acceptable at all.

Karst is not a minor construction detail. It determines whether pollutants, concrete washout, hydrocarbons, sediment, peat-contaminated water or disturbed drainage could enter underground pathways and travel rapidly towards springs, streams, rivers, wells, Lough Melvin SAC or other sensitive waters. If karst connectivity is unknown, the Board cannot safely assess hydrology, hydrogeology, Appropriate Assessment, pollution risk, mitigation, emergency response or downstream effects.

The Planning Authority's 2021 position is therefore highly important. If it was unacceptable to confirm ground conditions only before construction for a temporary 100 m mast in upland bog, then it is plainly unacceptable to defer karst studies or essential ground investigations until after permission for a fourteen-turbine wind farm.

This is not just a technical omission. It affects the legal and scientific basis of the EIAR and Appropriate Assessment. The Board must be able to assess the real effects of the project before

consent is granted. It cannot grant permission first and allow the applicant to discover later whether the ground, peat, bog, karst and hydrological system can safely accommodate the development.

The 2021 mast correspondence shows that the applicant and its consultants were on notice from an early stage that upland bog ground conditions, bog slippage and Shass Mountain were central concerns. They were also on notice that post-consent confirmation of ground conditions was not acceptable to Leitrim County Council.

In my submission, the current application has not learned from that warning. It repeats the same flaw on a much larger scale by leaving critical karst and ground-condition certainty unresolved. This is especially serious because the proposed turbines, borrow pits, roads and hardstands are located in a landscape of upland bog, steep slopes, watercourses, caves, swallow holes, karst features and downstream protected waters.

The conclusion is clear. The EIAR cannot rely on later studies, later confirmation, later construction-stage investigation or later mitigation to answer fundamental questions about ground conditions, karst connectivity, bog slippage and water pollution risk. These matters had to be investigated and resolved before permission was sought. This supports refusal.

Published Scientific Evidence on Irish Peat Landslides, Forestry, Wind Farm Roads and Watercourse Pollution

I submit that the paper by Dykes (2022), 'Landslide investigations during pandemic restrictions: initial assessment of recent peat landslides in Ireland', is directly relevant to the proposed Lissinagroagh Wind Farm.

This paper confirms that peat landslides, including bogflows and bog slides, are recognised phenomena in Ireland, particularly in upland blanket peat landscapes. It records that several peat landslides occurred in 2020, including a bogflow at a wind farm, and that forestry operations probably contributed to two of the landslides.

The relevance to Dough Mountain is clear. The proposed development is located in an upland blanket peat, forestry, watercourse, karst and slope-risk environment. It involves turbine foundations, crane hardstands, borrow pits, roads, drainage works, tree felling, storage of materials, movement of peat and spoil, and construction traffic across sensitive ground. These are the same types of landscape and disturbance factors that make peat failure risk a serious planning issue.

Dykes records the 2020 Boleybrack Mountain / Shass Mountain bogflow in County Leitrim. That event occurred in upland blanket bog influenced by commercial forestry and rainfall. This is important because Leitrim County Council specifically referred to Shass Mountain when it stated in 2021 that it was unacceptable to leave ground-condition confirmation until before construction for the temporary 100 m mast in upland bog.

Dykes also records the Meenbog Wind Farm bogflow in County Donegal. This is particularly important because the paper states that the failure appears likely to have been associated with construction of a new access road. The paper also notes that turbine-base construction was not directly relevant because there were no turbines within 300 m of the landslide source area. This supports my submission that peat failure risk is not confined to turbine foundations. Access roads, floating roads, drainage, forestry, storage, loading and construction sequencing can also trigger or contribute to peat instability.

This is highly relevant to Lissinagroagh because the proposal includes extensive access roads, hardstands, borrow pits, drainage works and construction traffic across upland peat and forestry. The risk cannot be assessed only by looking at individual turbine bases. The entire construction

system must be assessed, including roads, turning areas, storage areas, emergency stone supply, material loading, drainage changes and watercourse pathways.

The paper also supports my concern that peat failure can pollute watercourses many kilometres downstream. This is directly relevant to the connected water system below Dough Mountain, including underground water, groundwater, karst pathways, springs, swallow holes, caves, the Lattone River, County River, Dooard River SAC, Sraduffy River, Lough Melvin SAC, Owenmore River, Lough Gill SAC, Glenfarne River and Lough MacNean.

In my submission, this scientific evidence reinforces the precautionary case for refusal. The proposed development is located in the type of upland blanket peat and forestry environment where peat failures are known to occur. The development would add roads, drainage, borrow pits, excavations, heavy materials and construction disturbance to that environment. The EIAR cannot rely on general mitigation or post-consent investigation where published evidence shows that peat failure can be triggered by construction activity, forestry influence, drainage changes and rainfall, and can cause serious downstream pollution.

This paper should be included in the technical evidence bundle as Appendix L - Dykes (2022), Peat Landslide Investigations in Ireland.

Additional Grounds - Dough Mountain NHA, Hen Harrier Compensation and Corralled Water Risk

Habitat Compensation, Legal Uncertainty and Failure to Avoid Effective Loss of Hen Harrier

I submit that the applicant's proposed habitat compensation strategy is one of the weakest parts of the entire Lissinagroagh Wind Farm application. It does not overcome the ecological objection. On the contrary, it confirms that the proposed development is predicted to cause serious harm to an established Hen Harrier breeding and foraging landscape.

The applicant's own Outline Biodiversity Management Plan contains a major admission. It states that the Ornithology Chapter of the EIAR concludes that breeding Hen Harriers are likely to be disturbed by the Proposed Project, leading to potential displacement from nesting and foraging areas and possibly resulting in the effective loss of the species from the site. It further states that, in the absence of mitigation, disturbance is predicted during both construction and operational phases, particularly due to the presence of operating wind turbines.

This is not a minor or theoretical impact. It is an admission that the proposed wind farm may remove Hen Harrier from a landscape that the applicant's own surveys show they have repeatedly used. The OBMP records that bird surveys from 2020 to 2025 consistently recorded one to two nesting Hen Harrier within the site and/or surrounding area, including a northern and southern pair. It also records that the southern pair attempted to nest annually between 2020 and 2025 and used a corridor approximately 2.5 km in length, shifting nest locations within that area.

This confirms that the proposed wind farm site and surrounding Dough Mountain, Saddle Hill, Faughery, Killea, Boleyboy and wider upland landscape are not marginal or occasional Hen Harrier habitat. They are part of a repeated, multi-year breeding and foraging territory.

The OBMP also accepts that current guidance recommends a disturbance-free buffer of up to 750 metres around nesting sites to avoid impacts, and that nesting locations are likely to shift over the lifetime of the wind farm due to forestry cycles. It further states that a single breeding pair of Hen Harrier is considered of national importance.

These admissions should lead to refusal. If Hen Harrier require disturbance-free buffers, if their nest locations shift, and if even one breeding pair is nationally important, then it is not acceptable to place fourteen large turbines, roads, borrow pits, compounds, drainage works, forestry clearance and operational turbine disturbance into the same landscape.

The applicant estimates that 109 hectares of currently suitable Hen Harrier foraging habitat may be lost due to displacement. When future forestry cycles are considered, the estimated loss rises to 140 hectares over the lifetime of the project, including approximately 76 hectares of higher-suitability habitat and 64 hectares of lower-suitability habitat.

This is a very substantial predicted loss. The applicant is not showing that there will be no meaningful effect. It is accepting that a large area of functioning Hen Harrier foraging habitat may be effectively lost and then proposing compensation to try to offset that loss.

I submit that this approach is wrong. Compensation is not avoidance. The existing habitat is already functioning. It is isolated, lightly disturbed, connected to Dough Mountain, connected to extensive upland bog, forestry edge, rough grassland and watercourses. Hen Harrier are already using it because it works. The planning authority should not permit the applicant to damage or displace this proven habitat and then attempt to recreate or encourage replacement use elsewhere.

The company's proposal to move habitat function approximately 700 metres away, including onto farming land not owned by Coillte, is not ecologically certain. Farming land has different disturbance levels, different management pressures, different ownership, different future land-use risks and different enforcement problems. A managed compensation field or farm plan cannot be assumed to replace an established upland breeding territory.

The OBMP itself recognises that compensation is uncertain. It states that compensation measures must support two pairs of Hen Harrier because a maximum of two pairs has been recorded breeding within the site over the last five years. It also states that compensation habitats must be located to maximise the chances that they will be used by Hen Harrier, that habitat types must be proven to be used by the species, that deliverability and landowner agreements must be demonstrated, and that most habitats take time to establish, sometimes several years. It also states that compensation areas need to be available at the time the existing habitats are lost.

This wording exposes the weakness of the plan. The applicant cannot guarantee that Hen Harrier will use the proposed replacement lands. It can only try to maximise the chances. Hen Harrier are wild birds. They may return to the existing Dough Mountain, Saddle Hill, Faughery, Killea or Boleyboy territories because those areas are already proven habitat.

The application also fails to answer a fundamental operational question: will the company stop the turbines if Hen Harrier return to their original nesting or foraging sites? If the answer is yes, the application must identify the shutdown trigger, the buffer distance, the breeding-season period, the decision-maker, the enforcement body, and whether the shutdown would apply for the full operational life of the wind farm. If the answer is no, then the compensation scheme cannot protect Hen Harrier from displacement, disturbance or collision risk.

The legal control over the proposed compensation lands is also uncertain. The applicant refers to legal agreements with landowners, but the public has not been shown who the contracts are between, whether they bind future owners, whether they are registered on the land folio, whether they survive sale, lease, inheritance or transfer, whether payments are index-linked for 30 to 35 years, or who enforces a breach if farming practice changes.

Only statutory protection can provide proper long-term legal certainty for biodiversity land. A developer, landowner or forestry company can call land a biodiversity area, but that is not the same as an NHA, SAC, SPA or other statutory conservation designation. This weakness is already proven

locally. Coillte identified six biodiversity areas without proper public or statutory protection, and those areas are now within the proposed wind farm site. This shows that private or internal biodiversity commitments can be overridden or absorbed into later development proposals.

There is also a serious EIAR issue. If the compensation lands are part of the environmental case for permission, then those lands must be assessed as part of the EIAR and Appropriate Assessment. Their current habitats, hydrology, drainage, farming practices, peat condition, species use, land ownership and long-term management risks should be before the public now. It is not adequate to say that detailed Farm Plans or a final Biodiversity Management Plan will be prepared after consent.

The weakness is made even more serious by the proposed borrow pit and construction traffic near Hen Harrier habitat close to T8. The risk to Hen Harrier is not only from the operating turbines. The construction phase itself would involve roads, borrow pits, excavation, machinery, stone extraction, loading, vehicle movements, personnel, noise, dust, vibration, drainage works and repeated disturbance. If a borrow pit is close to the Hen Harrier nesting or foraging area near T8, and if construction traffic will use the same road, the disturbance would be direct, repeated and foreseeable.

The applicant's compensation strategy should therefore be treated as evidence that the proposed turbine layout is fundamentally unsuitable. If the project requires the displacement of a nationally important Annex I raptor from an established breeding and foraging landscape, and then relies on uncertain future compensation on privately managed lands, the correct planning response is not to condition or modify the proposal. The correct response is to refuse permission because the impact should be avoided at source.

Dough Mountain NHA Site Synopsis - Blanket Bog, Heath, Streams, Flushes and Peat Stability Risk

I submit that the Dough Mountain Natural Heritage Area Site Synopsis is directly relevant to the proposed Lissinagroagh Wind Farm and strongly supports refusal.

The Site Synopsis describes the southern side of Dough Mountain as steeper and more exposed, supporting more heath vegetation with exposed rock. It states that the intact blanket bog supports a good heath and moss cover, with peat depths of up to 2 metres. This is highly relevant because the proposed development is not located in a stable, low-risk industrial landscape. It is located within and beside an upland peat, heath, forestry and hydrological system.

The Site Synopsis also records that swards of upland grassland occur on the lower slopes and as patches within the heath and blanket bog mosaic. It states that these areas feature many narrow streams and flushed channels, characterised by rushes, grasses and frequent Heath Spotted-orchid. This confirms that the site is hydrologically sensitive and that water movement across the mountain is part of the ecological value of the area.

This directly supports my concern that turbines, access roads, borrow pits, hardstandings, drainage works, forestry felling, cable trenches, storage areas and construction traffic could interfere with the natural water system of Dough Mountain. The hydrology is not separate from the habitat. The streams, flushed channels, wet cutover areas, bog mosses, heather, cotton grasses and peat are part of one connected upland system.

The Site Synopsis also records very wet regenerating cutover areas on the margins of the site, with good cover of Ling Heather, Purple Moor-grass, cotton grasses and carpets of bog mosses. This is important because it shows that even previously disturbed peat areas can remain wet, sensitive and capable of regeneration. Such areas should not be treated as suitable for further industrial disturbance.

The Site Synopsis identifies Red Data Book species within the site, including Irish Hare, Common Frog and Red Grouse. This confirms that the area has recognised biodiversity value beyond individual habitats. It supports my objection that the EIAR should assess the wider ecological system, including species, habitats, watercourses, peatland condition, forestry edge, heath, grassland and connected upland areas.

The Site Synopsis also states that current land use on the site consists of sheep grazing, and that adjacent land uses include extensive conifer afforestation, peat cutting and grazing. It records that these activities have already resulted in habitat loss and damage to the hydrological condition of the site. This is highly significant. The correct response should be protection, restoration and sensitive management - not the addition of fourteen 185 m turbines, access roads, borrow pits, hardstandings, drainage works and permanent infrastructure.

Most importantly, the Site Synopsis specifically warns about wind energy development. It states that Dough Mountain may be under consideration for wind energy development, and that the placement of access road networks and turbine foundations associated with such developments causes habitat loss and disturbance and can destabilise the peat and lead to erosion.

This is a direct warning. It identifies the exact type of development now proposed and the exact risks now raised in this objection: habitat loss, disturbance, peat destabilisation and erosion.

The Site Synopsis further states that Dough Mountain NHA is of considerable conservation significance. It contains an extensive area of upland blanket bog with associated upland heath and grasslands. It describes blanket bog as a globally scarce resource. The current area of intact upland blanket bog in Ireland represents only a fraction of the original resource due to afforestation and overgrazing, and intact examples are therefore extremely valuable for nature conservation. Their long-term survival requires sensitive management.

In my submission, the proposed Lissinagroagh Wind Farm is the opposite of sensitive management. It would introduce major industrial infrastructure into and beside a vulnerable upland blanket bog and heath system already identified as sensitive to wind energy development. The applicant has not demonstrated that fourteen 185 m turbines and associated infrastructure can be reconciled with the conservation significance, hydrological sensitivity, peat stability risk and restoration needs of Dough Mountain NHA.

T5, T13 and T14 - Narrow Streams, Flushed Channels and Corralled Water Risk

I submit that the proposed locations of T5, T13 and T14 are especially unsuitable because planning permission is being sought to build major turbine infrastructure in areas associated with steep upland ground, forestry, narrow streams, flushed channels, peat, bog vegetation and natural water movement from Dough Mountain.

The Site Synopsis describes areas of Dough Mountain with many narrow streams and flushed channels, characterised by rushes, grasses and Heath Spotted-orchid. These are not dry or insignificant landscape features. They are part of the living hydrological system of the upland bog, heath and grassland mosaic.

Photograph: Upland bog, heath and mossy wet ground on Dough Mountain. This supports the Dough Mountain NHA Site Synopsis evidence regarding intact blanket bog, heath, wet flushes and sensitive hydrology.

Photograph: Forestry, peat and drainage feature showing exposed ground and water movement. This supports the objection that forestry, peat and drainage changes interact and cannot be assessed as isolated construction points.

T5, T13 and T14 must therefore be assessed not simply as turbine points on a map, but as major industrial structures proposed within a sensitive upland water and peat system. Turbine foundations, hardstandings, access tracks, drainage works, felling, stone placement, culverts, cable trenches,

storage areas and construction traffic would all interfere with the natural movement of water through these narrow streams, flushed channels, forestry drains and seepage routes.

My concern is that the proposed works at T5, T13 and T14 could corral water into confined spaces, instead of allowing water to spread naturally through the bog, flushes, forestry ground and narrow channels. This could increase the force of water on the surrounding bog, raise pressure within the peat, create erosion points, and contribute to peat instability or bog slippage.

By placing turbine foundations, hardstands, access tracks, drains, culverts and stone infrastructure in areas of narrow streams, flushed channels and sensitive sloping forestry ground, the development could corral natural water movement into confined artificial routes. This would increase the force of water against the surrounding bog and embankments, potentially destabilising peat, accelerating erosion and increasing the risk of bog movement downslope from Dough Mountain.

That increased force is important. In an upland blanket bog, water pressure is not a minor issue. Concentrated water can erode peat, undercut channels, increase saturation, destabilise banks, create new flow paths, increase pore-water pressure and weaken the surrounding bog structure. Where water is confined by roads, hardstands, foundations or drains, the surrounding peat may be placed under greater pressure than existed naturally.

This is especially serious because T13 and T14 are in isolated and sensitive locations near watercourses, while T5 is located on sensitive sloping ground associated with Dough Mountain and forestry. If natural flushes, seepage routes, forestry drains and narrow streams are altered, blocked, culverted or redirected, the effect could be to place more pressure on adjacent bog, embankments and downstream channels. The development could therefore increase the risk of erosion, peat movement, bog slippage and pollution of connected waters.

The risk is not only during construction. Once turbine foundations, hardstands, roads and drains are installed, they become long-term artificial features within the upland hydrological system. They may continue to redirect and concentrate water for the operational lifetime of the wind farm. This could alter the hydrological condition of the bog for decades.

The Dough Mountain NHA Site Synopsis is directly relevant because it states that access road networks and turbine foundations associated with wind energy development can cause habitat loss and disturbance, destabilise peat and lead to erosion. That is exactly the risk at T13 and T14. The proposed works would not merely sit beside the bog system; they would interfere with the water movement that supports the bog system.

In my submission, the EIAR has not demonstrated that T5, T13 and T14 can be constructed without damaging narrow streams, flushed channels, wet bog vegetation, forestry seepage routes, peat stability and downstream water quality. The applicant must prove how natural water movement will be maintained, how water will not be corralled into confined spaces, how peat will not be destabilised, how flushes will not be drained or blocked, and how erosion will be avoided over the full lifetime of the development.

If this cannot be proven with certainty before permission is granted, the precautionary conclusion is refusal. T5, T13 and T14 are proposed in the wrong locations, in a hydrologically sensitive upland bog, forestry and flush-channel system where construction could increase water force, destabilise peat and damage the very habitat features for which Dough Mountain is recognised as being of conservation significance.

Appendix B - Schedule of Information Completeness, Townlands and Planning Information

I submit that Appendix B, Schedule of Information Completeness, should not be treated as proof that the planning application is complete in substance or environmentally adequate.

The Schedule states that it seeks to provide details to facilitate An Coimisiun Pleanala in undertaking the Completeness Check required by Section 37JA of the Planning and Development Act 2000, as amended, in order to process the application. It also states that it shall not be construed as comprising an assessment of the application documentation or a consideration of the merits of the proposed development.

This wording is highly significant. It means Appendix B is a processing checklist, not an environmental assessment and not a confirmation that the EIAR, NIS, planning statement, public notices, planning history, EIA Portal material or townland information are accurate, complete or adequate.

Under the public notice information, Appendix B refers to all townlands within the site boundary being correctly named. That is a narrow requirement. It concerns townlands inside the site boundary. It does not mean that all townlands affected by the proposed development have been identified.

This is a major distinction. The effects of the proposed Lissinagroagh Wind Farm would not stop at the site boundary. The development may affect surrounding and downstream townlands through surface water, underground water, karst pathways, peat movement, sediment release, construction traffic, turbine delivery, grid connection, shadow flicker, noise, landscape impact, tourism, biodiversity, Hen Harrier movement, Curlew movement, emergency access and cumulative effects with Faughery Wind Farm.

In my submission, the application should not merely identify townlands within the site boundary. It should also identify the wider affected townlands, including townlands adjoining the site, downstream of Dough Mountain, along the Lattone River, County River, Dooard River SAC, Sraduffy River, Lough Melvin SAC, Owenmore River, Lough Gill SAC, Glenfarne River and Lough MacNean, and along the separate grid connection and turbine delivery routes.

The same concern applies to the references in Appendix B to the EIA Portal, Planning Statement and Planning History. The fact that these items may be listed for completeness-check purposes does not prove that they have been properly recorded, fully assessed or adequately explained.

The planning history is highly material in this case. It should include and properly address the 2009 Dough Mountain refusal, the 2021 P.21/110 temporary 100 m mast Further Information request, the Planning Authority's concerns about upland bog and Shass Mountain, the Croagh Wind Farm refusal, the Letter Wind Farm refusal, Garvagh Glebe peat-slide evidence, Shass Mountain and other relevant peat, landslide, hydrology and ecological cases. If the application does not clearly identify and assess this planning history, then the completeness schedule cannot cure that defect.

The reference to the EIA Portal is also not enough by itself. EIA Portal notification is an administrative step. It does not prove that the EIAR has assessed the full project, including the current wind farm application, the requested ten-year/design flexibility application, the separate grid connection, turbine delivery, borrow pits, receiving water environment, underground water, karst, protected species, downstream SACs and cumulative effects.

In my submission, Appendix B confirms a weakness rather than resolving one. It shows that the application is being checked for processing purposes, but it expressly does not amount to an assessment of the merits. Therefore, An Coimisiun Pleanala must still examine whether all information has been properly recorded and whether the EIAR and NIS are substantively complete.

The applicant should be required to demonstrate clearly whether all townlands within the site boundary are correctly named; whether all directly and indirectly affected townlands outside the site boundary are identified; whether the full planning history has been recorded and assessed; whether the EIA Portal description reflects the whole project; whether the grid connection, design flexibility and ten-year permission are properly cross-referenced; whether the public notices allow the public to understand the full environmental footprint of the project; and whether the EIAR assesses the complete development and receiving environment.

A completeness-check schedule cannot replace a full assessment of accuracy, adequacy and environmental effects. If the application only identifies townlands within the site boundary and fails to identify the wider affected townlands, then the public notice and application documentation are too narrow. This undermines public participation and supports refusal.

Appendix A1 - Photograph Evidence: GSI Landslide Mapping, Upland Bog Slippage and River Pathways

These photographs should be read together with the GSI landslide/slippage mapping and the main objection. They show that the risk is not theoretical. The upland bog and NHA landscape contains steep ground, wet channels, visible slippage-prone areas and rivers directly below the slopes. Proposed turbine locations including T1, T2, T3, T4, T5 and T6 are within or adjacent to this wider slope, peat and drainage system. Any disturbance to peat, forestry, drainage or water movement could increase the risk of sediment, peat and polluted runoff entering downstream watercourses.

Photograph A1 - Upland bog slippage/GSI mapped area near proposed T1

This photograph shows the upland bog landscape adjacent to the proposed turbine areas, including ground conditions associated with the GSI slippage evidence. I rely on this photograph to show that peat instability and slope risk are visible in the receiving environment and should be assessed with the GSI landslide mapping.

Photograph A2 - Upland bog slippage adjacent to proposed T1 area

This photograph shows visible bog/peat disturbance and slippage in the upland area adjacent to the proposed T1 turbine location. I rely on this photograph together with the GSI landslide susceptibility mapping to show that the development is proposed in a landscape where peat instability is not theoretical but visible on the ground.

Photograph A3 - Bog slippage descending towards watercourse

This photograph shows bog/peat movement descending towards a watercourse. It supports my concern that peat disturbance or slippage from the wind farm area could enter streams and downstream waters, including the connected catchments leading towards the Lattone River, County River, Sraduffy River, Lough Melvin SAC and other protected waters.

Photograph A4 - Steep drainage channel crossing upland bog

This photograph shows a steep drainage route crossing upland bog. I rely on this as evidence that water movement on Dough Mountain is active, steep and connected. Any turbine foundation, hardstand, access track, culvert or drainage alteration could concentrate water, increase erosion force and destabilise peat.

Photograph A5 - Flash-flood water descending from Dough Mountain

This photograph shows fast water movement descending from Dough Mountain. It supports my concern that the EIAR underestimates flash-flood risk, emergency access difficulty, erosion risk and the speed at which sediment or pollution could be carried from turbine and borrow pit areas into downstream watercourses.

Photograph A6 - Saddle Hill upland bog descending towards mapped slippage area

This photograph shows the upland bog landscape descending from the Saddle Hill/Faughery direction towards the area identified on GSI mapping. It supports my objection that the proposed turbines at T2, T3 and nearby locations are within a connected slope, peat and drainage system, not isolated construction points.

Photograph A7 - Upland bog/NHA area, wind farm landscape and steep slippage above river

This photograph shows upland bog/NHA ground in the wider wind farm landscape, with steep ground and visible slippage above a river. I rely on this photograph with the GSI landslide/slippage mapping to show that peat instability, slope, water movement and downstream river risk are already present in the landscape adjacent to proposed turbine areas including T1, T2, T3, T4, T5 and T6.

Photograph A8 - River in flood below steep upland slippage

This photograph shows a river in flood below steep upland bog and slippage-prone ground. It supports my concern that any peat movement, sediment release, drainage failure or construction disturbance upslope could quickly enter watercourses and travel downstream through the connected catchment.

Additional Photograph Evidence - Slippage, Bembo, Thur, Lough Melvin and Faughery

The following additional photographs are included to support the observation with local visual evidence. They should be read with the written sections on peat instability, GSI landslide/slippage mapping, Dough/Thur Mountains NHA, Lough Melvin SAC, cumulative impact with Faughery Wind Farm, and the wider landscape including Bembo Mountain and Thur Mountain. The photographs are relied upon as local evidence that the proposed development would substantially alter and industrialise a sensitive upland peat, forestry, water, habitat and landscape system.

Photograph A10 - Faughery Wind Farm, Saddle Hill and adjoining upland bog

Caption: This photograph shows existing wind energy development in the wider Saddle Hill and upland bog landscape. I rely on it to show cumulative landscape and environmental impact, and to show that further turbines would extend industrialisation across a sensitive upland peat landscape.

Photograph A11 - Upland bog/NHA overlooking forestry and Lough Melvin

Caption: This photograph shows upland bog and NHA landscape overlooking forestry and Lough Melvin. I rely on it to show the connection between the proposed wind farm landscape, forestry, upland peat, scenic views and the protected Lough Melvin receiving environment.

Photograph A13 - View over Manorhamilton and Bembo Mountain from the upland landscape

Caption: This elevated photograph shows the wider receiving landscape from the Dough/Thur upland area, including views towards Manorhamilton and Bembo Mountain. I rely on it to show that the visual and landscape impact is not confined to the turbine bases or site boundary.

Photograph A14 - Wider Lough Melvin and border upland landscape from the wind farm area

Caption: This photograph shows the wider upland and Lough Melvin landscape context from the wind farm area. I rely on it to show that the proposed development would affect a broad scenic, ecological and hydrological landscape, not ordinary industrial land.

Photograph A15 - Slippage on GSI mapping context with Lough Melvin direction

Caption: This photograph shows visible slippage and upland peat disturbance in the wider GSI mapping context, with the Lough Melvin direction in the receiving landscape. It supports my objection that peat instability, slope, water movement and downstream risk must be assessed together.

Photograph A16 - Upland bog and slippage area corresponding with GSI mapping

Caption: This photograph shows upland bog and visible ground disturbance corresponding with GSI landslide/slippage mapping. It supports my submission that the GSI mapping should be treated seriously and tested against real ground conditions.