

Submission to An Coimisiún Pleanála

Re: Proposed Lissinagroagh Wind Farm, Co. Leitrim

Case Reference: PAX12.324290

From: Mihaela Davidescu and James McMorrow

Date: 10 July 2026

We object to the proposed development for the reasons set out below.

1. The proposal is premature pending completion of the updated regional planning framework.

Section 29 of the Planning and Development Act 2024 requires each Regional Spatial and Economic Strategy to include a **strategy relating to onshore renewable energy** (section 29(1)(e)) and a **strategy relating to landscape and landscape character** (section 29(1)(m)).

The latter is intended to coordinate the categorisation of landscapes “*in terms of their capacity to absorb particular types of development, across the region so as to ensure a consistent approach to the protection of the landscape*”.

The Northern and Western Regional Assembly is currently reviewing its Regional Spatial and Economic Strategy, with the pre-draft consultation having closed on 22 May 2026. The renewable energy and landscape strategies required by section 29 have not yet been adopted.

The revised National Planning Framework (NPO 74 and Table 9.1) similarly requires Regional Assemblies to plan how and where regional renewable energy capacity is to be delivered, including allocations for each constituent local authority.

Responsibility for delivering regional renewable energy targets should not fall disproportionately on any single county or landscape.

Less environmentally and visually sensitive locations may exist elsewhere within the region, further from settlements and rural dwellings and outside designated Areas of High Visual Amenity.

Such matters are more appropriately considered through the regional, plan-led process now underway.

In these circumstances, granting permission at this stage would risk pre-empting the outcome of that strategic planning process.

2. The assessment of alternative sites appears to have been limited.

Chapter 3 of the EIAR explains that the assessment of “Alternative Locations” consisted of GIS screening exercises undertaken in 2014 and 2017 across Coillte’s own landholding of approximately 441,000 hectares. The screening applied a number of commercial and technical criteria, including minimum wind speeds, minimum site size, wind energy zoning and proximity to available grid capacity.

The EIAR does not describe any assessment of locations outside the applicant's landholding, nor does it present a comparative environmental assessment of alternative sites across the wider region. It also states that the selection of alternative technologies "was carried out after the proposed project site was chosen" (Section 3.8).

The EIA Directive requires a description of the reasonable alternatives studied together with the main reasons for selecting the preferred option, "taking into account the effects of the project on the environment".

Based on the information presented in the EIAR, the site selection process appears to have been driven primarily by land ownership and commercial considerations rather than by a comparative assessment of reasonable alternatives based on environmental effects.

3. The Landscape and Visual Impact Assessment excludes a candidate World Heritage landscape.

The methodology in Chapter 13 of the EIAR provides for a 25-km study radius "where landscape features of national and international importance exist". However, a 20-km study area was adopted on the stated basis that "there are no landscape features of national or international importance between 20–25 km". Chapter 14 likewise states that "There are no UNESCO World Heritage sites within the 30km of the proposed wind farm. Additionally, there are no sites included on the tentative list located within 30km."

These statements cannot be reconciled with the **Passage Tomb Landscape of County Sligo**, which was submitted to UNESCO for Ireland's World Heritage Tentative List in January 2023. (Please refer to <https://www.worldheritageireland.ie/tentative-list/the-passage-tomb-landscape/> and <https://whc.unesco.org/en/tentativelists/6635/>)

Using the turbine coordinates provided in Table 2-1 of the EIAR, the **Carrowmore passage tomb complex** lies approximately 27–28 km from the nearest proposed turbine and therefore falls within the 30-km radius referred to in Chapter 14.

The great cairn on Carns Hill, overlooking Lough Gill, is less than 23 km from the nearest turbine and therefore lies within the very 20–25 km distance band where Chapter 13 claims that there are no landscape features of national or international importance.

These Neolithic monuments were deliberately located to maintain extensive intervisibility across the surrounding landscape, and that wider landscape setting forms an important component of the proposed Outstanding Universal Value of the tentative World Heritage property. The potential effects of turbines with a maximum tip height of 185 metres on that wider landscape setting have not been assessed.

The Landscape and Visual Impact Assessment also relies on separate county landscape character assessments prepared at different times across five counties and two jurisdictions. This further illustrates the absence of the consistent, region-wide approach to landscape categorisation and protection now required by section 29(1)(m) of the Planning and Development Act 2024.

4. Effects on the Dough Mountain Area of High Visual Amenity will be negative.

The proposed turbines are sited across the 'B3 – Dough Mountain' Area of High Visual Amenity identified in the Leitrim County Development Plan. The EIAR itself describes the project as "situated partially in and adjacent to" this designated area. The Plan describes this landscape as generally remote and tranquil, characterised by a "smooth rounded mountain skyline... conferring a sense of place on the local area", with panoramic views enjoyed from its elevated locations.

The area is highly valued for outdoor recreation, including walking and enjoyment of its open upland landscape.

The introduction of turbines up to 185 metres in height would represent a substantial, negative and permanent change to the character of this landscape by placing intrusive, large-scale engineered structures into an upland area specifically recognised for its natural skyline, tranquillity and scenic quality.

5. Sequential views experienced by road users have not been fully considered.

The EIAR's Zone of Theoretical Visibility mapping shows a "star-like pattern" of visibility extending from Manorhamilton along the surrounding valleys. Chapter 13 classifies residual visual effects on the N16 National Primary Route as ranging between Moderate and Slight, with the greatest effects occurring on the sections closest to the site and east of Manorhamilton.

Road users approaching the application site from either direction on the N16, together with those travelling on the R280, R282, R283 and R286, would experience repeated and sequential views of the turbine array. These views would include designated Scenic View V16 and the Area of Outstanding Natural Beauty at O'Donnell's Rock, approximately 4 km south of the site.

The cumulative experience of travelling through this landscape would therefore be materially altered, extending beyond the individual viewpoints assessed within the EIAR.

Conclusion

For the reasons set out above, we respectfully request that An Coimisiún Pleanála refuse permission for the proposed development or, at a minimum, defer its determination pending the adoption by the Northern and Western Regional Assembly of the onshore renewable energy and landscape strategies required by section 29 of the Planning and Development Act 2024, and require a revised Landscape and Visual Impact Assessment based on a 25-km study area.

Yours faithfully,

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