

Submission to An Coimisiún Pleanála
Request for Refusal of Planning Permission for the Proposed Wind Farm Development
at Lissinagroagh (Dough Mountain), County Leitrim

Case reference: PAX 12.324290

1. Introduction

My name is Rita McNulty and I am a native of Lissinagroagh, County Leitrim. I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Future Energy wind farm at Dough Mountain, County Leitrim. While renewable energy and climate action are essential national objectives, this proposal represents an inappropriate and excessive industrial-scale development on a highly sensitive upland peat landscape. The applicant has not demonstrated, to the strict legal and scientific standard required under Irish and European environmental law, that the project can proceed without unacceptable impacts on peatland, hydrology, protected species, landscape, local amenity and the wider sustainable development of North Leitrim. The applicant, Future Energy cites a range of complex and constraining issues related to environment, hydrology, peatland, flora and fauna which would all require mitigation. However, the mitigation outlined in the planning application documentation is inadequate and impossible to guarantee which clearly suggests that the location is entirely unsuitable for a large industrial construction.

2. Planning Policy

The Leitrim County Development Plan (LCDP) 2023-29 supports renewable energy in line with national policy and is aligned to our responsibility as citizens to address the climate crisis. However, the LCDP states clearly that support for renewable energy is subject to proper planning and environmental requirements. The Leitrim Renewable Energy Strategy which is an appendix to the LCDP, states that the opportunities for new wind farms are limited and require assessment on both planning and environmental grounds. The proposed Lissinagroagh Wind Farm does not demonstrate the suitability of Dough mountain in line with planning and environmental requirements.

2.1 Previous refusal of a wind farm on this mountain

In 2010 An Bord Pleanála refused planning permission for a wind farm on Dough Mountain (PL.12.2347410). There were two main reasons for the refusal which were firstly, the location is a protected blanket bog and secondly, the wind farm

would result in an unacceptable obtrusive feature on the landscape and visual amenity of the area.

The current proposal from Future Energy is a much larger development which would have an even greater negative impact on the carbon sink than the 2010 proposal. The community finds it hard to understand how a much bigger and more intrusive wind farm could be considered as the mountain and the conditions that pertain have not changed since 2010.

2.2 Scale and Visual Impact of the Development

The proposed development consists of fourteen wind turbines with blade tip heights of up to 185 metres, together with turbine foundations, crane hardstands, access roads, borrow pits, drainage infrastructure, underground cabling, turbine delivery route works and biodiversity enhancement lands. These structures would permanently transform the character of Dough Mountain and the surrounding North Leitrim landscape. The turbines would dominate views across the area, industrialising a landscape valued for its openness, scenic quality, quietness and recreational amenity appeal.

3. Peatland and Bog Stability Concerns

My central concern and that of the community is the vulnerability of the upland blanket bog and peatland system. Dough Mountain is a steep-sided upland landscape with clear hydrological pathways feeding into rivers, streams and downstream water systems. The applicant's own documentation recognises peatland sensitivity, peat stability concerns and hydrological connections to protected European sites, including Lough Gill SAC and Lough Melvin SAC. The construction of turbine foundations, access roads, drainage systems and borrow pits on peatland terrain carries serious risks including peat instability, bog slide, drainage alteration, sediment release, carbon loss and long-term degradation of ecological function.

We have experience of bog landslides in County Leitrim particularly those caused by tree planting and other developments. The Shass mountain bog slide in June 2020 on Shass mountain near Drumkeeran released approximately 160,000 tonnes of peat causing severe damage to surrounding farmlands, local streams and the Dawn of Hope bridge. While it was triggered by torrential rain, the slide was exacerbated by mounds and drainage systems from Coillte's 140 hectare upland conifer plantation at the top of the mountain.

In 2008 the Owengar river suffered severe ecological destruction due to a major peat landslide which is linked to the site of a wind farm development on Corry Mountain , near Arigna, in Co Leitrim. Our neighbours in Co Donegal experienced the same

negative impact which occurred on Meenbog wind farm in Barnesmore Gap, Co. Donegal.

It is clear from these examples and others around the country that upland bog terrain is wholly unsuitable for large-scale, industrial-type constructions and can cause more harm in the long term albeit appearing to address our need for alternatives to fossil fuel.

4. Impact on Protected Species

The proposal raises serious concerns in relation to protected habitats and species. The applicant acknowledges likely significant pre-mitigation effects on breeding hen harrier due to operational displacement from nesting and foraging habitat. Rather than avoiding these impacts at source, the proposal relies heavily on compensation measures, habitat enhancement, monitoring and adaptive management over the lifetime of the project. In my submission, this approach does not remove reasonable scientific doubt as required under Article 6(3) of the Habitats Directive.

Similarly, the applicant's bat assessment records seven bat species within the study area, including activity at or near all turbine locations and one bat roost within the development area. Four turbines are identified as High Risk and three as Medium Risk in relation to bats. The proposed mitigation measures, including curtailment, acoustic monitoring and post-construction surveys, amount to risk management after permission rather than certainty that impacts will be avoided.

The application also identifies marsh fritillary butterfly as part of the ecological baseline. The proposal relies on habitat management, exclusion zones and possible translocation of larval webs if discovered during construction. Again, this demonstrates uncertainty and reliance on future management rather than true avoidance of impacts.

5. Hydrology and Water Quality

Hydrology is another major issue. The site is hydrologically connected to sensitive European-designated water systems, including Lough Gill SAC and Lough Melvin SAC. Construction activities on upland peatland carry risks of sediment release, pollution and water quality deterioration. While the applicant proposes mitigation measures such as drainage controls, sediment management and monitoring, these measures cannot eliminate all uncertainty, particularly given increasing extreme weather events linked to climate change.

6. Landscape, Tourism and Recreational Amenity

The proposal would significantly damage landscape character, recreational amenity and tourism potential in North Leitrim. Dough Mountain forms part of the setting of

Manorhamilton and contributes to the unique identity of the North Leitrim Glens. The area is valued for walking, cycling, quiet roads, green lanes and nature-based recreation.

I am a member of the local Holey Soles Walking Club and Dough mountain and environs is part of our walking territory that we appreciate both for ourselves, locals and visitors. We hold an annual Hillwalking Festival at Easter attracting tourists which is part of the 'green, slow adventure, nature-based tourism' offering that County Leitrim provides and promotes. This is in keeping with the County Leitrim Tourism Strategy.

The construction and operation of turbines of this scale would permanently alter the visual and environmental character of the area and undermine efforts to promote Leitrim as a destination for tourism, remote working and quality rural living.

7. Grid Connection and Prematurity

There are also serious concerns regarding project-splitting and prematurity. The applicant's own documents acknowledge that the wind farm and the proposed grid connection are functionally interdependent and constitute a single project. However, the grid connection and substation infrastructure are not included within the present application. It is inappropriate to seek permission for the wind farm in isolation while leaving the essential grid infrastructure to a future process. The environmental and cumulative impacts of the entire project should be assessed together.

8. National Energy Policy Considerations

The proposal must also be considered in the wider national energy context. Ireland is already experiencing significant renewable energy curtailment due to grid constraints and insufficient storage infrastructure. Large quantities of available wind energy are currently being dispatched down because the system cannot use or store it effectively. Before sensitive upland peatlands and high-value landscapes are industrialised, greater emphasis should be placed on offshore wind, rooftop solar, grid reinforcement, energy storage, retrofitting and community energy systems.

9. Light Flicker, Shadow Flicker and Human Health

The potential impact of shadow flicker, turbine lighting and visual disturbance on human health and wellbeing is also a serious concern in this application.

Turbines of the scale proposed, standing up to 185 metres in height, have the potential to create repeated moving shadow effects on nearby homes, roads, farms and outdoor spaces during periods of sunlight. Shadow flicker can be intrusive and distressing for residents, particularly where it occurs regularly over long periods or during sensitive times of the day. Even where technical thresholds are claimed to comply with guidance standards, the lived experience for nearby residents can still be significant.

The issue is not solely one of numerical compliance. The cumulative impact of large moving structures, rotating blades, flashing aviation lights, night-time visibility and constant visual motion can contribute to stress, anxiety, sleep disturbance and reduced enjoyment of the home environment. In a rural area characterised by low background light levels, dark skies and tranquillity, the introduction of industrial-scale lighting and turbine movement would fundamentally alter the character and atmosphere of the area.

The Board should also consider the psychological impact of visual dominance and the loss of control residents may feel over their surrounding environment. Rural communities value peace, quietness and the ability to enjoy their homes and outdoor spaces without persistent industrial intrusion. The continuous presence of four turbines' movement and lighting can have a cumulative effect on mental wellbeing, particularly for families living in close proximity to the development.

Residents living near the proposed development would experience these impacts not as isolated technical matters, but as part of an overall deterioration in residential amenity and quality of life. The effects of shadow flicker, aviation lighting, visual dominance, turbine movement and associated stress should therefore be assessed together when considering the impact of the proposal on human health and wellbeing.

The general community and particularly those living close to Dough mountain are very worried about this issue. We have heard first hand from people living near the Faughery wind farm, which overlooks Manorhamilton, that their lives have been very negatively impacted by the proximity of the turbines. This is not a theoretical issue, it is a day-to-day experience for the residents whose lives, farms and property has changed for the worse .

In my submission, the scale and elevated location of the proposed turbines would create unacceptable impacts on the health and quality of life of people living beside the turbines. It would also be contrary to the proper planning and sustainable development of the area.

9. Support for Climate Action but Opposition to this Proposal

I wish to emphasise that this objection is not opposed to renewable energy or climate action. Ireland must transition to a low-carbon future. However, renewable development must be planned in a way that protects sensitive landscapes, peatlands, biodiversity, water systems and rural communities. Poorly sited renewable infrastructure risks undermining public confidence in climate policy and causing irreversible environmental damage. It is imperative that the public and in this case the community of North Leitrim, have trust in national climate change policies and feel that as citizens their concerns and rights are upheld and respected.

10. Conclusion

For these reasons, I submit that the proposed development is contrary to the proper planning and sustainable development of the area. The applicant has failed to remove reasonable scientific doubt regarding ecological, hydrological and peatland impacts. The development would industrialise a sensitive upland landscape, damage visual amenity and recreational value, and create unacceptable risks to protected species and habitats.

Accordingly, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed wind farm development at Dough Mountain, including all associated infrastructure, the proposed 10-year permission period and the proposed 35-year operational lifespan.

Yours truly,

Rita McNulty
Rosses Lower, Rosses Point, Co. Sligo.