

Observations on the planning application for the proposed Lissinagroagh Wind Farm on Dough Mountain and Saddlehill, Co. Leitrim

Applicant: FuturEnergy Ireland
Development: Proposed Lissinagroagh Wind Farm
Case Reference: PAX12.324290

Locations:

The townlands of Boleyboy, Cashelaveela, Cherrybrook, Coolodonnell, Faughary, Killea, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherny, Co. Leitrim.

AN COIMISIÚN PLEANÁLA	
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By:	hany

To the deciding panel at An Coimisiún Pleanála

I respectfully request An Coimisiún Pleanála to refuse a 10-year planning permission to the above proposed Lissinagroagh Windfarm development of 14 turbines and all associated infrastructure, site, and project works.

Introduction

My background and my main concerns relevant to my request are explained on the following pages.

I am a resident of Tullyskeherny, Rossinver Co. Leitrim and live within 2 km of the proposed wind farm site.

I came to live and work in Rossinver in January 1997. When asked in my job interview how long I could envisage to stay I said, “about 2 years”! The rest is history as they say.

I had never heard of North Leitrim before, never mind been to the area. That was 30 years ago. I never lived anywhere else in Ireland, and I can wholeheartedly say that Rossinver and especially “my” townland of Tullyskeherny is my home.

The peaceful environment without major roads and industrialisation, being surrounded by unspoilt nature and integrated in the social fabric of the wider Manorhamilton communities is priceless and so worth protecting.

I farm in a traditional low input way on about 30 acres and have an extremely big interest and passion for our native Irish wildlife, animals, and plants.

Biodiversity

In 2016 I discovered Marsh Fritillary larval webs on our land. I knew nothing about this protected butterfly. Since then, I gradually learned about its protected status, lifecycle, and reliance on a specific habitat, and I am managing 90% of the farmland in a way to protect the habitat of the legally protected Annex II butterfly. I got support from the Butterfly Conservation in Northern Ireland, and I am monitoring and recording larval webs annually to the National Biodiversity Data Centre (NBDC) for their long-term Marsh Fritillary Monitoring project.

Over the past 10 years I submitted numerous records of common and rare animals and plants, too. Every year I discover a new, not yet recorded, or rare species in our area.

Four years ago, I was privileged to observe my first ever Common Lizard on one of my parcels of land. He did not just show up out of no-where but lived happily, undisturbed, and unnoticed all the time right beside me. And this year I have seen Adder's Tongue, a minute rare fern, growing on a bank on my land.

Dough Mountain and Saddlehill, where the proposed windfarm is planned for, are at first sight not madly spectacular mountains in terms of biodiversity and habitats but a closer and more consistent year round look reveals their outstanding beauty and immense importance to our wildlife: 7 species of bats (of the 9 Irish species) are so far recorded in that area, birds notably the hen harrier, lately the white tailed eagle, the buzzard at least two colonies of migratory sand martins to name the highlights are observed regularly nesting and foraging in that area.

Marsh Fritillary, the Irish Frog, pine marten, otters, badgers, and foxes are known to live or forage there. There are not many records of them though. Two special rare plants, the Small White Orchid and a tiny moss, are legally protected under the Flora Protection Order (FPO) and have been recorded in the area.

There are a couple of unique and special habitats found too, namely non marine caves and blanket and upland bog.

Part of Dough Mountain is a National Heritage Area (NHA).

I looked very closely at the Volume II EIAR chapter 5 Biodiversity of the proposed project. And although initially the sheer quantity of information suggests a thorough investigation of the site by taking my time and reading carefully through the chapter it appears that a lot of survey data are outdated and/ or not relevant to the new wind farm layout, rushed, incomplete, referenced wrongly or not at all. A targeted botanical survey for example for two protected plant species has not taken place at all, despite many pages given over to the importance and relevance in the area to them.

My main concern with the proposed windfarm is therefore mainly in regard to the impact of the proposed project would have on the Biodiversity in the area. And these apply to all phases of construction, operation, and decommissioning.

Ireland's biodiversity is in a serious crisis too with losing unique and important habitats and risking the loss of plant and animal species. The impact projects like the proposed wind farm have on habitats and biodiversity need to be taken very seriously into account if allowing them to go ahead. There can be no ambiguity, wishful thinking or tolerance to oversight.

I politely request An Coimisiún Pleanála to go through the EIAR chapter very carefully and thoroughly on biodiversity.

Over the past 5 years County Leitrim consistently showed up in the lower ranks of the NBCD county league database for recorded animal and plant species. In 2021 Co. Leitrim made it to number 22 the highest ranking and fell to number 28 in 2024 the lowest, out of all 32 counties.

The EIAR for the proposed windfarm is using, amongst other databases, the NBDC database for their desktop study, which has a limited amount of data really.

Our county's biodiversity is definitely under recorded.

The necessary subsequent assessments and mitigation measures are therefore inadequate or downright questionable and flawed.

The cumulative and trans boundary effects are inaccurate.

The boundaries of the site study area and field survey area are depicted the same on some maps but there are contradictions in the report about survey areas and study areas.

Also, at the public clinic the senior ecologist explained to me that the larval webs of the Marsh Fritillary they encounter will be dug up with their food plant and transferred to one of the northerly enhancement areas.

There is no mentioning of moving them to this area in the report but that the "turves" will be trans located within the footprint of the site into a close-by Marsh Fritillary habitat, it is shown on the map 5-37, p. 113 of the EIAR.

These are only a couple of inadequacies, contradictions and faults described and explained that I noticed in the Biodiversity chapter or by speaking with the ecologist. Because of this I am seriously concerned about the quality of environmental assessment report not taking the impact of the development on the biodiversity fully and accurately into account.

I have more questions to the reports accuracy and validity, for example:

- I do not understand why the grid connection route (GDR) was surveyed and studied and is part of this report, given that the GDR is not part of this planning application PA X12.324290.

It is very confusing and questionable.

The “Do- nothing- scenario” described on p133 and 134 in the EIAR chapter on Biodiversity assumes, that if the proposed windfarm project does not go ahead, intensive sheep grazing and commercial forestry will continue. This is a simplistic, backwards, and one-sided statement to put in an EIAR not considering changes to EU law in the near future.

The EU Nature Restoration Law, which will be signed off this September, will require that Ireland restores 20% of its land and sea areas by 2030 and all degraded ecosystems by 2050. This will affect how Ireland manages its ecosystems with direct impact on agriculture, forestry, and the marine environment.

I’m putting out an alternative “do nothing scenario,” that when the proposed Lissinagroagh windfarm does **not** go ahead, that the Dough and Thur Mountain National Heritage Areas are going to be merged, then expanded in all directions and restored and managed by new schemes and incentives under the EU Nature Restoration Law to create a biosphere for all living beings to benefit from and flourish in, financially, socially and legally, a win-win!

Soil and Geology

I have further concerns about the impact the development off the proposed windfarm would have on the **soil and geology**. Mainly in regard to land and peat slides.

IN 2010 a smaller windfarm project was refused planning permission mainly because of the risk of land/ peat slides.

Water Quality

The impact the proposed windfarm will have on **water quality during** construction phase of the two Special Area of Conservation (SAC) lakes Lough Melvin and Lough Gill are a serious concern.

Lough Melvin in particular is a home to unique species of fish, the Sonaghan, Gillaroo and the Ferox , all sub species of trout . The Sonaghan and the Gillaroo are endemic to Lough Melvin. They have not been found anywhere else in the world.

And Lough Gill is the source of our drinking water.

Public Engagement

My concerns about FuturEnergy's **public engagement** are very personal. The community liaison officers (CLO) called at the beginning of the project to our house to introduce the project and we received their letters in 2021 and 2022. Then nothing. I heard neighbours occasionally saying that they see the CLO calling to people and others said they got leaflets or updates.

We got one letter by the company dated November 9th, 2022. After that nothing till a visit in March 2026.

The community liaison officer called to the house with the March 2026 brochure. On leaving, one of the officers asked how the "old man" was doing. The "old man," John, he was asking about, who was born, reared, and lived all his life in Tullyskeherny had passed away in August 2022 I had to inform him.

I am not giving out that the CLO did not know about John's passing but rather that this little personal remark glaringly shows the lack of public engagement over the past 3 and a half years. Their public engagement was very selective and limited.

Another lack of engaging with the public I noticed is that they have not included, never mind informed, landowners with turbary rights during the process when securing land for the enhancement areas. Turf will be not allowed on these enhancement lands.

The public clinic held on two days this spring was an over-the-top show off while at the same time highly intimidating and again a selective and limited affair: by appointment only, blackened out windows, 5 officials busying around with their folders, maps, and photomontages. How can you ask in depth questions on a proposed development you have not been even a tiny bit included in the past 5 years and have not seen the maps and paperwork only on the day for 20 min? And the one specific question I asked the senior ecologist on the day was even answered wrong, see above in reference to Marsh Fritillary.

Another concern I have about public engagement is the accuracy of the map in the March 2026 brochure, Figure 5 p16 and 17. The "Present project layout" omits the construction of a temporary site road to a public road L61844, between T13 and T14. That is very misleading and false information to the public who this publication is aimed at. How can farmers and home and landowners on that road ask relevant questions at clinics if information relevant to them is not presented clearly and accurately?

Project Splitting

I also have concerns regarding **project splitting and prematurity**.

The applicants own document acknowledges that the windfarm and the proposed grid connection route are functionally interdependent and constitute a single project.

However, the grid connections and substation infrastructure are said to “fall under a different part of the Planning and Development Act, s182A, therefore this will be a separate planning application to An Coimisiún Pleanála” quote from project brochure, March 2026, p20. It is inappropriate to seek permission for the windfarm in isolation while leaving the essential grid infrastructure to a future process.

The environment and cumulative impacts of the entire project should be assessed together

Conclusion

I am not against renewable energy projects, but the proposed Lissinagroagh Wind Farm is not the right development for the Dough Mountain area. Dough Mountain is not a suitable location for a windfarm.

What I have seen in the one chapter of the EIAR does not represent a comprehensive, careful, and diligent approach to a honest and critical assessment to the suitability of renewable energy project to its environment. And it raises the questions for me about all the other aspects that have to be considered.

As said at the beginning I respectfully request An Coimisiún Pleanála to refuse a 10-year planning permission to the proposed Lissinagroagh Windfarm development of 14 turbines and all associated infrastructure, site, and project works.

Respectfully,



Sabine Waniek

Address: Tullysheherry, Rossinver, Co. Leitrim

sabinewaniek1@gmail.com