

Objection to ABP Case Number 324290 by Scott Coombs

1. INTRODUCTION

This submission constitutes a formal objection to the proposed Lissinagroagh Wind Farm on the grounds that the Environmental Impact Assessment Report (EIAR), specifically Chapter 13 (Landscape and Visual), is materially deficient, methodologically flawed, and fails to comply with statutory requirements under the Planning and Development Acts and the EIA Directive (2014/52/EU).

It is further submitted that the proposed development is inconsistent with the proper planning and sustainable development of the area, having regard to the Leitrim County Development Plan (CDP), particularly in relation to landscape protection, scenic amenity, and rural character.

2. FAILURE TO ADEQUATELY ASSESS THE BOLEYBRACK UPLANDS AONB

The proposed development lies within the Zone of Theoretical Visibility (ZTV) of the Boleybrack Uplands Area of Outstanding Natural Beauty (AONB), a designated high-value landscape under the CDP.

The EIAR fails to meaningfully assess impacts on this designated landscape for the following reasons:

- **Absence of Representative Viewpoints:**
No primary viewpoints are located within the core of the Boleybrack uplands. The only viewpoints (VP25 Tullysheherny and VP26 O'Donnell's Rock) are peripheral and do not represent the most sensitive receptors.
- **Systematic Underrepresentation of Impact:**
By excluding central upland viewpoints—including the L2206 corridor (Glenboy–Gortnalibbert–Meenymore)—the EIAR avoids assessing the most severe and direct visual effects.
- **Contradiction of Capacity Study Guidance:**
Appendix IX (Part B), Section 3.4.3 of the Landscape Capacity Study explicitly states:
“careful design would be needed to limit the visual influence of any wind turbines... on the scenic Boleybrack mountain skyline.”

The EIAR does not demonstrate such “careful design,” nor does it test the proposal against skyline intrusion thresholds.

3. OMISSION OF THE L2206 SCENIC ROUTE AS A HIGH-SENSITIVITY RECEPTOR

The L2206 route from the N16 through Glenboy, Gortnalibbert, and Meenymore:

- Functions as a de facto scenic route under CDP criteria (Table 13-6 equivalent classification)
- Traverses a high-value upland landscape
- Provides direct, open, elevated views toward Dough Mountain and the proposed turbine array

Despite this:

- The route is not assessed as a primary viewpoint
- It is absent from formal scenic route analysis
- It is not classified as a high-sensitivity receptor

This omission is significant and materially undermines the EIAR’s conclusions.

Based on standard methodology, receptors along this route would be classified as:

- High sensitivity
- High magnitude of change
- Significant, negative, long-term effects

The EIAR’s failure to include this receptor constitutes a selection bias in viewpoint methodology, leading to systematic underestimation of impact.

Here are the viewpoints included in the Planning Application:



Significant viewpoints along the L2206 corridor

VP-SC1



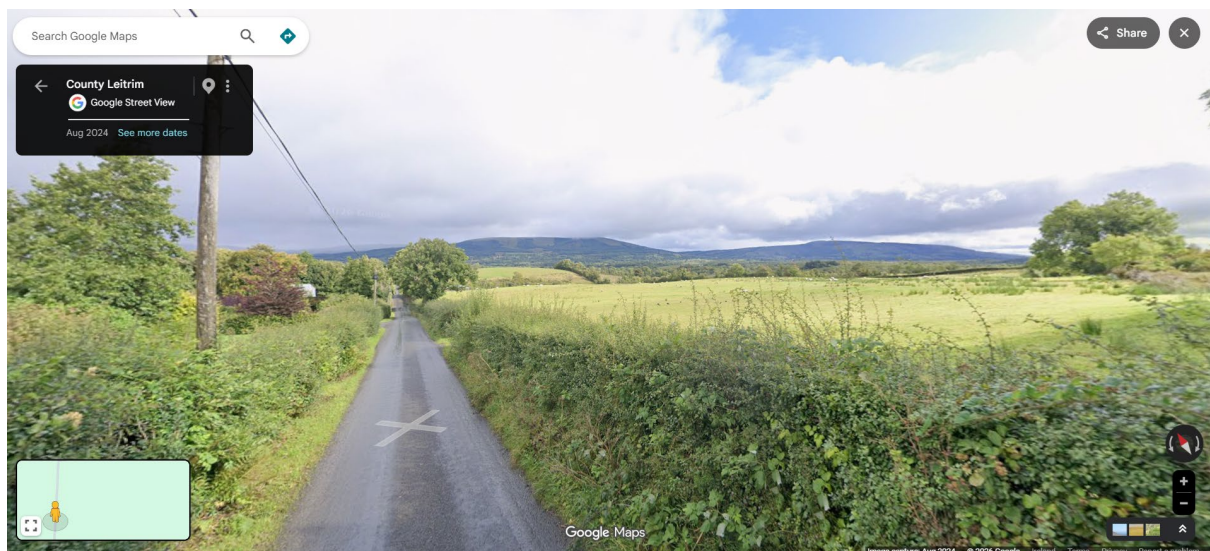
VP-SC2



VP-SC3



VP-SC4



VP-SC5



VP-SC6



VP-SC7



https://www.google.com/maps/d/u/0/edit?mid=1HrswdQF0VSfyxp51d_b2boN5LZXJ9U&usp=sharing

The EIAR's viewpoint selection is flawed in that it:

- This is contrary to best practice guidance (GLVIA3), which requires:

- The result is a non-representative visual assessment, rendering conclusions unreliable.

5. SKYLINE INTRUSION AND LANDSCAPE CHARACTER IMPACT

The proposed turbines, by virtue of their scale and siting:

- Will interrupt and dominate the Boleynbrack skyline
- Will be visible in direct alignment with Dough Mountain
- Will transform a cohesive upland landscape into an industrialised visual field

This represents:

- A breach of landscape character integrity
- A significant adverse effect on a designated AONB
- A failure to respect landscape sensitivity classifications

6. MISUSE OF “AVAILABLE FOR TURBINES” IN THE COUNTY DEVELOPMENT PLAN

The developer’s planning statement appears to rely on the classification of certain areas as “available for wind energy development” within the CDP.

This reliance is misplaced and materially misleading:

- “Available for turbines” is not a presumption in favour of development
- It is a broad spatial filter, not a site-specific endorsement
- It is explicitly subject to:
 - Landscape protection policies
 - Environmental constraints
 - Visual amenity considerations

The CDP clearly requires that:

- All proposals must be assessed on their merits
- Landscape designations such as AONBs take precedence in sensitive areas
- Development must not result in unacceptable adverse visual impacts

The EIAR fails to demonstrate compliance with these overriding criteria.

7. CONFLICT WITH COUNTY DEVELOPMENT PLAN POLICY

The proposed development is contrary to key CDP objectives, including:

- Protection of Areas of Outstanding Natural Beauty
- Preservation of scenic routes and views
- Maintenance of rural landscape character
- Avoidance of visually dominant or intrusive development

The failure to properly assess impacts on the Boleybrack AONB and the L2206 route results in a clear policy conflict.

8. INADEQUACY OF THE EIAR (FORMAL GROUND FOR REFUSAL)

The EIAR is inadequate for the purposes of EIA Directive compliance because it:

- Fails to assess likely significant effects on a designated AONB
- Omits key high-sensitivity viewpoints
- Relies on a non-representative dataset
- Understates magnitude and significance of visual effects
- Does not provide a robust or complete baseline

As such, the Board cannot be satisfied that:

- The environmental effects have been fully identified
- The assessment is complete and reliable
- The proposal complies with statutory requirements

9. CONCLUSION AND REQUEST

Having regard to:

- The failure to assess the Boleybrack uplands AONB
- The omission of the L2206 scenic route as a key receptor
- The flawed viewpoint methodology
- The significant adverse visual and landscape impacts
- The misinterpretation of CDP zoning provisions
- The inadequacy of the EIAR

It is respectfully submitted that:

The proposed development would seriously injure the visual amenities and landscape character of the area, would be contrary to the proper planning and sustainable development of the area, and would materially contravene the policies and objectives of the Leitrim County Development Plan.

Accordingly, it is requested that An Bord Pleanála refuse permission for the proposed development.

Submitted by:

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