Re: Observation on proposed Wind Farm development at Lissinagroagh (Dough Mountain),Co. Leitrim

Reference: PAX12.324290

Submitted by:
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We wish to make an observation on the proposed wind farm development at Lissinagroagh (Dough Mountain), County Leitrim.

At the outset, we wish to state that we support the development of renewable energy and recognise the need for Ireland to increase indigenous renewable electricity generation as part of the transition to a low-carbon future. However, support for renewable energy should not be interpreted as support for every wind farm proposal regardless of location.

In our opinion, Dough Mountain is an unsuitable location for a development of this scale due to the sensitivity of the receiving environment, the importance of the upland landscape, the presence of extensive peatland habitats and the potential impacts on local communities, biodiversity and tourism.

For the reasons outlined below, we respectfully request that An Coimisiún Pleanála refuse planning permission for this proposed development.

1. **Impact on the Character of Dough Mountain and the Wider Landscape**

Dough Mountain forms an important part of the landscape character of North Leitrim and the wider border region. The mountain contributes significantly to the area's sense of place and provides an attractive natural backdrop that is largely free from industrial development.

The proposed turbines, with tip heights of approximately 185 metres, would become dominant features within the landscape and would be visible over a wide geographical area. Their height and scale would fundamentally alter the appearance of the mountain and surrounding uplands.

While the visual impact of renewable energy infrastructure is unavoidable to some degree, there are locations where such impacts can be accommodated more appropriately. In our view, the scale of this proposal is disproportionate to the capacity of the receiving landscape and would result in a permanent transformation of a largely natural environment into an industrial energy site.

The landscape value of Dough Mountain extends beyond scenic considerations. It contributes to recreation, tourism, local identity and residents' quality of life. These are important planning considerations which deserve significant weight.

2. Concerns Regarding Peatland Disturbance and Environmental Risk

A significant concern relates to the nature of the site itself. The proposed development would be located within an upland area characterised by blanket bog and deep peat deposits. These peatlands have developed over thousands of years and provide important ecological, hydrological and carbon sink storage functions.

The construction of turbine foundations, access roads, crane pads, cabling and associated infrastructure will require substantial ground disturbance. While mitigation measures and peat management plans have been proposed, it is difficult to avoid the conclusion that such extensive construction activity will alter the existing peatland environment.

We are also concerned about the long-term implications for peat stability and drainage patterns. Even where engineering assessments suggest that risks can be managed, there remains significant uncertainty when major infrastructure such as the proposed is located within sensitive peatland areas.

The potential consequences of peat failure or altered hydrological conditions could extend beyond the immediate development footprint and affect downstream habitats, watercourses and land uses.

3. Biodiversity and Habitat Protection

The Environmental Impact Assessment documentation identifies a number of ecological sensitivities within the development area.

These include blanket bog habitats, protected bird species including Hen Harrier, bats, marsh fritillary habitats, otter activity and hydrological linkages to designated conservation areas.

We acknowledge that the applicant has proposed a range of mitigation and habitat management measures. However, the extent of the proposed mitigation itself illustrates the ecological sensitivity of the site.

In particular, concerns remain regarding:

- Potential displacement effects on breeding hen harrier;
- Risks to bat populations associated with turbine operation;
- Habitat fragmentation resulting from new infrastructure;
- Impacts on blanket bog ecosystems;
- Changes to drainage patterns and associated ecological effects.

The potential impact of the proposed development on the Hen Harrier (*Circus cyaneus*) is one of the most serious environmental concerns associated with this application.

The Hen Harrier is a species of high conservation concern in Ireland and is protected under Directive 2009/147/EC on the Conservation of Wild Birds (the Birds Directive). It is also protected under the Wildlife Acts 1976–2023. The species has experienced significant population declines across Europe and remains vulnerable to habitat loss, disturbance and fragmentation.

The uplands of Counties Leitrim and Fermanagh represent an important landscape for the species, providing suitable nesting, foraging and hunting habitat. The protection and maintenance of these habitats is essential to achieving Ireland's obligations under Article 2 and Article 4 of the Birds Directive, which require Member States to maintain bird populations at a level corresponding to ecological, scientific and cultural requirements and to protect habitats necessary for their survival and reproduction.

The Environmental Impact Assessment documentation submitted by the applicant acknowledges the likelihood of disturbance and displacement effects on Hen Harrier arising from the proposed development. The fact that significant mitigation and compensation measures are proposed demonstrates the ecological sensitivity of the site and the recognised risk to this protected species.

Scientific studies have demonstrated that large wind energy developments can result in:

- Loss of suitable nesting and foraging habitat;
- Displacement of breeding birds from traditional territories;
- Reduced habitat utilisation due to turbine avoidance behaviour;
- Fragmentation of upland habitats; and
- Disturbance during construction and operational phases.

Of particular concern is the applicant's reliance on compensatory habitat management and long-term monitoring to address impacts on the species. Such measures cannot guarantee that displaced breeding pairs will successfully relocate or maintain breeding success elsewhere. Once a breeding territory is abandoned, there is no certainty that equivalent habitat can replicate the ecological conditions developed over many years.

The importance of the Hen Harrier extends beyond biodiversity alone. It is widely regarded as an indicator species for the health of Ireland's upland ecosystems. A decline or displacement of Hen Harrier populations may signal wider ecological degradation within the surrounding landscape. The protection of this species therefore contributes to the protection of a much broader network of habitats and wildlife.

Given:

- The acknowledged risk of disturbance and displacement;
- The conservation status of the Hen Harrier;

- The dependence of the species on extensive upland habitats such as those found on Dough Mountain;
- The uncertainty surrounding the effectiveness of proposed mitigation measures; and
- The legal obligations arising under the Birds Directive and Irish wildlife legislation,

We submit that the applicant has not demonstrated beyond reasonable scientific doubt that significant adverse effects on the Hen Harrier population can be avoided.

In these circumstances, the precautionary principle should prevail, and planning permission should be refused.

While monitoring and adaptive management can be valuable tools, they do not guarantee that impacts will not occur. Once sensitive habitats are damaged or ecological functions disrupted, restoration may be difficult or impossible to achieve fully.

We believe the ecological value of this upland landscape warrants a greater degree of protection than is afforded by the current proposal.

4. Climate Objectives Must Not Undermine Existing Carbon Stores

We fully support efforts to reduce carbon emissions and increase renewable energy production.

However, Ireland's climate response should not involve unnecessary damage to existing natural carbon sinks. Blanket bogs are recognised as important carbon stores and play a significant role in climate regulation.

It is noteworthy that peatlands occupy only around 3% of the Earth's land area, yet they store more carbon than all of the world's forests combined. In contrast to rainforest carbon, which is largely stored in vegetation above ground, peatlands lock carbon into deep organic soils over millennia. Disturbance of these soils can release carbon that has accumulated for thousands of years, potentially undermining some of the climate benefits that renewable energy developments seek to achieve.

The disturbance of peat through excavation, drainage and construction can result in the release of stored carbon. While the development may generate renewable electricity, it is reasonable to question whether sufficient consideration has been given to the loss of carbon sequestration functions associated with the affected peatlands.

We believe greater weight should be given to protecting intact peatland systems as part of Ireland's overall climate strategy.

5. **Potential Impacts on Residential Amenity**

The proposed development would introduce a substantial industrial element into a rural environment that is currently characterised by tranquillity and limited levels of development.

Residents living in proximity to the turbines may experience impacts arising from:

- Continuous turbine movement;
- Shadow flicker;
- Aviation warning lighting;
- Visual dominance within the landscape;
- Increased traffic and activity during construction.

While compliance with technical standards is important, planning decisions should also consider broader impacts on the enjoyment of homes and the quality of the rural living environment.

We are particularly concerned about the cumulative effect of these factors over the lifetime of the development.

Conclusion

While we support the continued expansion of renewable energy infrastructure across Ireland, we do not believe Dough Mountain is an appropriate location for a wind farm of this scale.

We remain concerned about:

- The permanent alteration of a prominent upland landscape;
- The disturbance of blanket bog and associated carbon stores;
- Potential impacts on biodiversity and protected species;
- Risks associated with peatland construction;
- Effects on residential amenity and
- The overall compatibility of the proposal with sustainable development objectives.

For these reasons, we respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed wind farm development at Lissinagroagh (Dough Mountain), County Leitrim.

Yours sincerely,

Shane & Gráinne Ward