

Submission by Treasure Leitrim in Relation to Planning Application

PAX12.324290

To:

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 9 July 2026

Re: Proposed Lissinagroagh Wind Farm, near Manorhamilton, County Leitrim

A chara,

Treasure Leitrim is a voluntary environmental organisation working to safeguard the natural landscapes, water resources, biodiversity and communities of North Leitrim. While originally established in opposition to proposed gold mining in the region, the organisation advocates for the protection of the county's natural heritage from developments that may result in irreversible environmental damage.

Treasure Leitrim recognises the importance of renewable energy in addressing climate change and reducing dependence on fossil fuels. However, support for renewable energy must be accompanied by careful site selection and responsible planning. Developments should avoid locations where the environmental, ecological and social costs outweigh the benefits.

Having examined the application, Treasure Leitrim submits that the proposed development is unsuitable for this location for the following reasons.

Environmental Impact

The proposed wind farm is to be constructed within an area of blanket bog, one of Ireland's most important peatland habitats. These ecosystems have developed over thousands of years and perform essential environmental functions that cannot be readily replaced once disturbed.

Blanket bog stores significant quantities of carbon, regulates natural water movement, reduces flood risk and supports specialised plant and animal communities. The excavation required for turbine foundations, access roads, drainage channels, cable routes and associated infrastructure would permanently alter this fragile environment.

Interference with the peatland will inevitably release stored carbon into the atmosphere while changing the natural hydrology of the site. Lowering groundwater levels can accelerate peat drying, shrinkage and oxidation, reducing the bog's capacity to function as a long-term carbon store.

Changes to drainage patterns may also increase the likelihood of peat instability and erosion, with consequences extending well beyond the immediate construction footprint.

The long-term environmental cost of damaging an intact blanket bog should be carefully weighed against the anticipated benefits of the proposed development.

Biodiversity

The proposed site lies within an upland landscape recognised for its ecological richness and diversity.

Dough Mountain and Saddle Hill provide habitat for numerous protected species, including seven of Ireland's nine bat species, Pine Marten, Otter and Irish Hare. The surrounding uplands also support important bird populations, including Hen Harrier, Red Grouse, Meadow Pipit, White Tailed Eagle, Skylark and Sand Martin. Reports of Golden Eagles dispersing into the area further demonstrate the ecological significance of the wider landscape.

The blanket bog and associated heath habitats also sustain a wide variety of mosses, lichens, orchids, heathers and wildflowers, which in turn support pollinating insects and other invertebrates.

Among these is the Marsh Fritillary butterfly, one of Ireland's most protected butterfly species under both national and European legislation. Habitat fragmentation, increased disturbance and infrastructure development have the potential to affect this species together with many others that depend upon relatively undisturbed upland environments.

Given the cumulative ecological value of the area, Treasure Leitrim believes that the precautionary principle should guide decision-making in this case.

Impact on the Local Population

Treasure Leitrim is concerned that the planning documentation may not accurately reflect the number and location of residential properties surrounding the proposed development. Local residents have raised concerns that occupied dwellings were omitted from maps used during the planning process, calling into question the reliability of residential impact assessments.

The proposed turbines would reach a maximum blade tip height of approximately 185 metres, making them among the tallest onshore turbines proposed in Ireland. Their scale represents a significant industrial presence within an otherwise rural landscape.

Residents living nearby may experience operational noise, shadow flicker and substantial visual impacts. Shadow flicker is capable of affecting homes during certain weather conditions and times of the year, reducing residential amenity and, in some circumstances, posing difficulties for individuals with photosensitive epilepsy.

Treasure Leitrim is also concerned that prolonged exposure to large industrial infrastructure may adversely affect quality of life for nearby residents, particularly where healthcare and mental health services are limited by the rural nature of the area.

Before any decision is reached, all occupied and potentially habitable dwellings should be accurately identified, mapped and assessed to ensure that the impacts of the proposal have been fully evaluated.

Geological Concerns

The geological characteristics of Dough Mountain raise additional questions regarding the suitability of this location.

According to *Leitrim's Geological Heritage – An Exploration of the Geology of County Leitrim* (Leitrim County Council, 2022), the mountain contains numerous underground limestone cavities and swallow holes, some extending to considerable dimensions. These features demonstrate that the underlying geology is naturally complex and vulnerable.

The excavation required for foundations, together with drainage works and increased water movement through peat, may accelerate the natural dissolution of limestone caused by acidic bog water. This process could enlarge existing underground cavities and contribute to increased ground instability over time.

The area also contains an interconnected system of springs, streams and underground watercourses. Any sediment or pollution generated during construction has the potential to travel through these networks and affect downstream rivers and lakes, including Lough Melvin and Lough Gill.

The geological and hydrological sensitivity of the site should therefore be regarded as a significant planning consideration.

Conclusion

Treasure Leitrim believes this proposal would introduce an intensive industrial development into one of North Leitrim's most environmentally valuable upland landscapes.

The proposal has the potential to permanently alter blanket bog habitats, release stored carbon, affect protected species, disturb sensitive geological formations and diminish the quality of life of nearby residents. These impacts are compounded by the exceptional scale of the fourteen proposed turbines.

It is also significant that an earlier proposal for considerably smaller turbines within the same locality did not receive planning permission because of concerns regarding its impacts. The current proposal is substantially larger and has the potential to result in even greater environmental and community effects.

For these reasons, Treasure Leitrim respectfully requests that An Coimisiún Pleanála refuse planning permission for the proposed Lissinagroagh Wind Farm and ensure that the environmental, ecological, geological and community concerns identified in this submission are given full consideration during its assessment.

Cllr James Gilmartin

Chairperson

Treasure Leitrim

Pollboy, Manorhamilton, Co.Leitrim