

Observation on the Proposed Dough Mountain (Lissinagroagh) Wind Farm
Application Reference: PA12.324290

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I am writing in my capacity as Chairperson of Our Native Glens, a community-led environmental organisation dedicated to restoring native woodlands, protecting biodiversity, conserving our natural heritage and reconnecting people with nature across North Leitrim. Our work is founded on the belief that climate action and biodiversity protection must go hand in hand. I therefore support the transition towards renewable energy; however, renewable energy developments must be located in places where they do not cause unacceptable and irreversible harm to environmentally sensitive landscapes and ecosystems.

Having reviewed the planning application, I wish to object to the proposed Dough Mountain Wind Farm for the following reasons.

1. An Environmentally Sensitive Landscape

Dough Mountain is one of the defining landscapes of North Leitrim. It forms part of an extensive upland mosaic of blanket bog, heath, streams, native woodland remnants and semi-natural habitats that support a rich diversity of wildlife.

The application itself demonstrates that this is an environmentally complex site requiring extensive mitigation, habitat management, compensation measures, hydrological controls and long-term monitoring. In my view, the need for such extensive mitigation is evidence that this landscape is inherently unsuitable for industrial-scale development.

Planning policy should prioritise avoiding impacts on sensitive landscapes rather than attempting to compensate for damage after it has occurred.

2. Biodiversity Loss

Our Native Glens has been established specifically because biodiversity loss has become one of the greatest environmental challenges facing Ireland.

The uplands around Dough Mountain provide habitat for numerous protected and declining species, including birds of prey, upland breeding birds, bats, mammals and specialist peatland flora and fauna.

Large wind energy developments inevitably result in habitat fragmentation through:

- construction of access roads;
- excavation for turbine foundations;

- drainage networks;
- borrow pits;
- crane hardstands;
- underground cabling;
- forestry removal where required; and
- increased long-term human disturbance.

Even where habitats are restored following construction, restored ecosystems rarely replicate the ecological complexity that has developed naturally over centuries.

The precautionary principle should therefore apply where uncertainty exists regarding long-term ecological impacts.

3. Peatlands are Climate Assets

Ireland's peatlands represent one of our most important natural carbon stores.

Healthy peatlands actively store carbon, regulate water, improve water quality and support specialised biodiversity. Disturbing peat through excavation and drainage can release significant quantities of stored carbon while reducing the ecosystem services these habitats naturally provide.

There is an inherent contradiction in addressing climate change by damaging ecosystems that already play an essential role in climate regulation.

The protection and restoration of peatlands is recognised nationally and internationally as a critical climate action measure.

4. Hydrology and Water Quality

Dough Mountain forms part of an interconnected upland catchment.

Extensive excavation, drainage and alteration of natural water flows have the potential to affect streams, groundwater and downstream aquatic habitats.

Even where mitigation measures are proposed, there remains uncertainty regarding long-term impacts resulting from:

- peat disturbance;
- sediment release;
- altered groundwater movement;
- changes in natural drainage patterns; and
- cumulative impacts during extreme rainfall events.

Given increasing rainfall intensity associated with climate change, protecting intact upland hydrology should be considered a priority.

5. Native Woodland Connectivity

One of the principal objectives of Our Native Glens is reconnecting fragmented native woodlands across North Leitrim.

The Dough Mountain landscape contributes to wider ecological connectivity between habitats, allowing wildlife movement and maintaining resilient ecosystems.

Industrial-scale infrastructure within this landscape has the potential to increase habitat fragmentation and reduce ecological connectivity, undermining many years of conservation work undertaken by local communities, volunteers and environmental organisations.

Habitat networks are increasingly recognised as essential for allowing species to adapt to climate change.

6. Landscape Character

The landscape surrounding Dough Mountain possesses exceptional scenic value, tranquillity and a strong sense of place.

Turbines approaching 185 metres in height would permanently alter the skyline and fundamentally change the character of one of North Leitrim's most distinctive upland landscapes.

Unlike many other forms of development, wind turbines remain visually dominant over extensive distances and their cumulative impact extends well beyond the immediate site.

The landscape itself represents an important environmental resource deserving protection.

7. Recreation and Wellbeing

The mountains and uplands of North Leitrim provide invaluable opportunities for walking, nature appreciation, photography, environmental education and quiet recreation.

These experiences depend upon wildness, natural soundscapes, dark skies and relatively undeveloped landscapes.

Industrialisation of this environment risks diminishing both the recreational experience and the mental health benefits that many local residents and visitors derive from spending time in nature.

8. Impact on Nature-Based Tourism

Increasing numbers of visitors are attracted to North Leitrim because of its landscapes, biodiversity and peaceful rural character.

Community organisations, accommodation providers, guides and local businesses increasingly promote the area's natural heritage as an economic asset.

Large-scale industrial development within this landscape has the potential to undermine the area's attractiveness for nature-based tourism, outdoor recreation and environmental education.

These sectors provide sustainable long-term economic benefits while depending upon the conservation of the very landscapes that make the area distinctive.

9. Community Stewardship

Over many years local communities have invested significant voluntary effort into restoring habitats, planting native trees, improving biodiversity and encouraging greater appreciation of our natural heritage.

Our Native Glens alone has committed considerable time and resources towards restoring native woodland and strengthening ecological resilience across the region.

Developments of this scale risk undermining those efforts by introducing industrial infrastructure into landscapes that communities have worked hard to conserve.

Climate action should strengthen community-led conservation rather than place it at risk.

10. Climate Action Must Deliver Multiple Environmental Benefits

Addressing climate change cannot be achieved solely through renewable energy generation.

Successful climate action also requires:

- protecting biodiversity;
- restoring degraded ecosystems;
- safeguarding peatlands;
- enhancing woodland connectivity;
- improving water quality; and
- increasing ecosystem resilience.

These objectives should complement rather than compete with one another.

Developments that require extensive ecological compensation indicate that the chosen location is fundamentally constrained.

Conclusion

My objection is not to renewable energy itself.

Rather, it is to the selection of an environmentally sensitive upland landscape that supports important habitats, peatlands, ecological connectivity, recreational value and community stewardship.

In my opinion, the planning application demonstrates the environmental sensitivity of the site through its extensive reliance on mitigation, habitat compensation, hydrological management and long-term ecological monitoring.

I respectfully submit that Dough Mountain is not an appropriate location for industrial-scale wind energy development and that the precautionary principle should be applied.

Ireland urgently needs renewable energy infrastructure, but it should be delivered in locations where it avoids significant harm to biodiversity, landscape character, peatland integrity, water resources and community amenity.

For these reasons, I respectfully request that An Coimisiún Pleanála refuses permission for the proposed development.

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