

From: [Bernard Greene](#)
To: [Communications](#)
Cc: [SIDS](#); [Kate Bradley](#); [Liam Flynn](#)
Subject: ACP-324290-26 Lissinagroagh Wind Farm SID / RED III application
Date: Tuesday 21 July 2026 15:45:06
Attachments: [Cover Letter Lissinagroagh Wind Farm 21.07.2026.pdf](#)
[CE Report - Lissinagroagh Wind Farm SID - Final - ACP.pdf](#)
[Microsoft PowerPoint - Lissinagroagh Wind Farm SID RED III 20.07.2026.pdf](#)
[Meetings Administrator Record of Special Meeting 20th July 2026.pdf](#)

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Good afternoon,

Please find attached copy of report prepared by Leitrim County Council with respect to the proposed Lissinagroagh Wind Farm SID / RED III application submitted by FuturEnergy Lissinagroagh Designated Activity Company (DAC) further to our obligations under the provisions of 37E of the Planning & Development Act 2000, as amended.

Please find copy of record of special meeting of Leitrim County Council which was held yesterday to consider said report and the resolutions approved by the members to make a number of recommendations to the Commission with regard to the report prepared by the Chief Executive. A copy of the Powerpoint Presentation which I gave at the meeting yesterday is included for completeness.

Kind regards,

Bernard Greene MIPI
Senior Planner
Planning Department

Áras an Chontae, Carrick on Shannon, County Leitrim, N41 PF67

Phone: +353 (0)71 9620005 Ext 502
Mobile: (087) 2307374
Email: bgreene@leitrimcoco.ie
Website: www.leitrimcoco.ie



Comhairle Chontae Liatroma
Leitrim County Council

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**An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902**

Reference: ACP-324290-26
Leitrim County Council Report – Proposed ‘Lissinagroagh Wind Farm Development’ (Application for Strategic Infrastructure Development under Section 37E of the Planning and Development Act 2000 (as amended)).

Date: Tuesday, 21 July 2026

A chara,

I refer to your notification dated 19th May 2026, as updated by your subsequent notification dated 16th July 2026, with respect to the submission of an application for consent to the Commission by FuturEnergy Lissinagroagh Designated Activity Company (DAC) under the provisions of 37E of the Planning & Development Act 2000, as amended. It is also noted that the application is subject to the provisions of the Renewable Energy Directive III.

In accordance with the requirements of Section 37E of the Act, the attached report was prepared by the Chief Executive and submitted to the Members of the Authority for their consideration on Wednesday 14th July 2026. The report sets out the position of the Local Authority that it is not considered that the proposed wind energy development can be endorsed by Leitrim County Council on the basis of the detail, analysis and justifications presented to date. The report was considered and was formally discussed at a special Council meeting held yesterday on Monday 20th July 2026. I attach separately a draft record of the meeting as prepared by the Meetings Administrator in which the Members set out their views on the submitted report and resolved to make a number of recommendations to the Commission. The record also includes a submission made by Cllr. Irene Guckian Rabbitte who was unable to attend but the Members agreed to include said submission with the record of the meeting. The presentation given at yesterday's meeting is also included for completeness.

Please note that this draft record will not be finalised under agreed with the Members at the next scheduled meeting of the Council, dated Monday 7th September 2026. Should any amendments be made to this draft record, the Local Authority will notify the Commission.

Le meas,

Bernard Greene,
Senior Planner



Comhairle Chontae Liatroma
Leitrim County Council

Chief Executives Report

FuturEnergy Lissinagroagh Designated
Activity Company (DAC)

Strategic Infrastructure Development
/ RED III Application

www.leitrim.ie

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 Comhairle Chontae Liatroma Leitrim County Council	Leitrim County Council Planning Report
Planning Reference No:	PAX12.324290 / ACP-324290-26
Applicant:	FuturEnergy Lissinagroagh Designated Activity Company (DAC)
Location:	Located in the townlands of Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherny, Co. Leitrim
Application Type:	Strategic Infrastructure Development / RED III Application – A 10-year planning permission is being sought.
Proposed Development	• Fourteen (14) no. wind turbines with a blade tip height range of 180m to 185m inclusive, a rotor diameter range from 149m to 163m inclusive, a hub height range from 101m to 110.5m inclusive, a minimum ground clearance of 22m, and all associated foundations, hardstanding and assembly areas; • A permanent meteorological mast with a height of 100m, with a lightning finial extending above the mast; • Modifications to an existing site access on the L61801 local road in the townland of Faughary in the west of the site, to be used as a permanent access during construction and operation; • A new temporary access on the L6184 local road in the townland of Cherrybrook for use by turbine delivery vehicles during construction only, and subsequent reinstatement; • Modifications to an existing site access on the L61844 local road in the townland of Lissinagroagh in the southeast of the site, to be used as a temporary access during construction phase only; • Approximately 7.95 km of new internal access tracks to include passing bays and associated drainage; • Upgrade of approximately 8.35 km of existing access tracks, to include passing bays and associated drainage; • Temporary and permanent drainage and sediment control systems; • Ten (10) no. clear span bridges and one (1) no. existing culvert extension at watercourse crossings by access tracks; • Three (3) no. borrow pits with a total available area of 63,352 m² for temporary use during construction. The borrow pits will subsequently be used for storage of excavated material; • Two (2) no. temporary construction compounds each on an area of 9,100 m² to contain site offices, storage containers, banded fuel storage, waste storage, parking areas and security fencing; • Seven (7) no. permanent controlled access points on the L61801 and L6184 Local Roads in the townlands of Faughary and Boleyboy to facilitate turbine delivery and construction works which will remain in place after the construction period;

- A temporary crossing of unnamed local road in the townland of Cherrybrook to facilitate turbine delivery vehicles during construction only;
- All associated underground electrical and communications cabling connecting the wind turbines to the on-site substation (the substation is subject to a separate planning application);
- All related site works and ancillary development including landscaping and soil excavation;
- Biodiversity enhancement areas (218.5 ha) to provide nesting and foraging habitat for birds and other land improvements; and
- Ancillary forestry felling to facilitate construction and operation of the proposed project.

Please note that a separate application to obtain approval for a proposed grid connection and 110 kv substation will be submitted to An Coimisiún Pleanála. This application, and the proposed grid connection application are functionally interdependent and constitute a single project. Notwithstanding separate consent application processes, the entirety of the development has been considered in the submitted Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

1. Introduction

An application for permission for the proposed development was submitted directly to An Coimisiún Pleanála under section 37E of the Planning and Development Act 2000, as amended (hereafter referred to as 'the Act'). The application is also the subject of the provisions of the Renewable Energy Directive (RED) III (hereafter referred to as 'RED III'). An Coimisiún Pleanála notified the Planning Authority of the receipt of this application in correspondence dated 19th May 2026.

The Planning Authority was requested to make the application documentation available for public inspection / purchase at our offices in accordance with the terms of the public notice. The Planning Authority received 2 no. hard copies of the complete application documentation along with a number of electronic copies. One hard copy was retained in the Planning Authority offices in Carrick-on-Shannon with the second hard copy placed on public display in Manorhamilton library. The application was also available to view electronically from the Commission's own website and a link to same was placed on our own website. The applicants also have all of the submitted documentation available on a dedicated website.

In accordance with Section 37E of the Act, the Chief Executive must submit a report to An Coimisiún Pleanála setting out the views of the Planning Authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area. This report is prepared to satisfy this legal requirement. The Act provides that the report must have particular regard to the matters specified in section 34(2) of the Act. The Planning Authority is restricted to considering the following when making its decision:

- i. The provisions of the development plan – in this case the Leitrim County Development Plan 2023-2029;
- ii. The provisions of any Section 28 Guidelines – the most relevant would include the Wind Energy Development Guidelines (2006) and revised draft Guidelines (2019);
- iii. The provisions of any special amenity area order relating to the area – there are no such orders affecting Co. Leitrim;
- iv. Any European site or other area prescribed for the purposes of section 10(2)(c) – there are a number of such sites in proximity to the site and with hydrological connections to / from the site;

- v. Where relevant, the policy of the Government, the Minister or any Minister of the Government – there are a number of such policies of relevance with the most relevant considered the Climate Action Plan (2025);
- vi. The matters referred to in subsection (4)- (i.e. conditions);
- vii. Previous developments by the applicant which have not been satisfactorily completed – no permission has been granted to the applicant to date so this is not considered relevant;
- viii. previous convictions against the applicant for non-compliance with this Act, the Building Control Act 2007 or the Fire Services Act 1981 – as above, and;
- ix. Any other relevant provision or requirement of this Act, and any regulations made thereunder.

Section 34E(5) of the Act requires that the Chief Executive of the Planning Authority, shall, before submitting their report to the Commission, submit the report to the Members of the Planning Authority and seek their views on the proposed development. A Special Meeting of the Council is arranged for Monday 20th July 2026 in this regard.

Section 34E(6) of the Act provides that the members of the Planning Authority may, by resolution, decide to attach recommendations specified in the resolution to the report of the Authority; where the members so decide those recommendations (together with the meetings administrator's record) shall be attached to the report submitted to the Board under subsection (4).

2. Site Location and Context

The proposed Lissinagroagh wind farm site is located in north Leitrim within the townlands of Boleyboy, Cashelaveela, Cherrybrook, Coolodonnell, Faughary, Killea, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle, and Tullyskeherny. The closest proposed turbine is located approximately 3km northeast of Manorhamilton and approximately 4km southwest of Kiltyclogher. The proposed biodiversity enhancement lands are located to the north and south of the wind farm in the townlands of Raheelin, Killea, Lugasnaghta, Cooloodonnell and Tullyskeherney and Cashelaveela. The location of the proposed development is shown in Figure 1 overleaf.

The proposed landholding within which the wind farm is located extends to approximately 1,096 ha, of which 785 ha are currently commercial forest owned and managed by Coillte. The remaining 311 ha are largely privately-owned third-party lands and comprise a mix of coniferous forestry, marginal agricultural land, peatbogs and transitional scrub. The planning application site boundary (red line) extends to 389 ha. The site is located in close proximity to the Co. Fermanagh border in Northern Ireland which is approximately 3 km to the north.

The proposed wind farm site is located in a relatively mountainous area, with Saddle Hill in the northwest of the site and Dough Mountain located within and along the eastern site boundary. The proposed wind farm site stretches through the valley between these two elevated areas and gently rises to the north. The southern portion of the site is where elevation is lowest. As the site extends northwards through the valley between the two mountains, the elevation rises steadily. The site ranges in elevation from 170 to 380 m AOD, with the eastern part of the site bordering Dough Mountain (462m).

The land use activities within the site are primarily commercial forestry, with expanses of wet grassland in the centre, northwest and southeast and upland blanket bog / open peatland particularly in the north and northwest. The area surrounding the proposed wind farm application site can be described as rural with a dispersed settlement type. The nearest residential dwelling is 763 metres from a proposed turbine. Residential

dwelling are broadly aligned with the local road network in the area surrounding the site and, for the most part, the site is relatively remote from settlement.

The application site can be accessed from the south east via the L61844 Local Road diverging from the L6184 off the N16 National Road east of Manorhamilton at Cherrybrook and from the west via the L61801 diverging from the R282 Regional Road. The local roads are linked to a network of existing Coillte and private forestry tracks, which provide good coverage and are maintained in a variable condition.

There is one operational wind farm located immediately west of the proposed wind farm site, namely Faughary Wind Farm, comprising three turbines, 119 m in height to tip height.

The proposed Turbine Delivery Route commences at the port of entry in Killybegs Co. Donegal and extends southeast around Donegal town before travelling southwest towards Sligo before approaching Manorhamilton and the proposed wind farm site from the south. The total length of the route is 122 km. Minor accommodations are potentially required at fifty-seven (57) no. locations along the 122 km route to facilitate the delivery of oversize turbine components to the site. These include temporary vegetation management, local strengthening of road edges and street furniture management to facilitate the transport of oversize turbine components to the wind farm site and subsequent reinstatement.

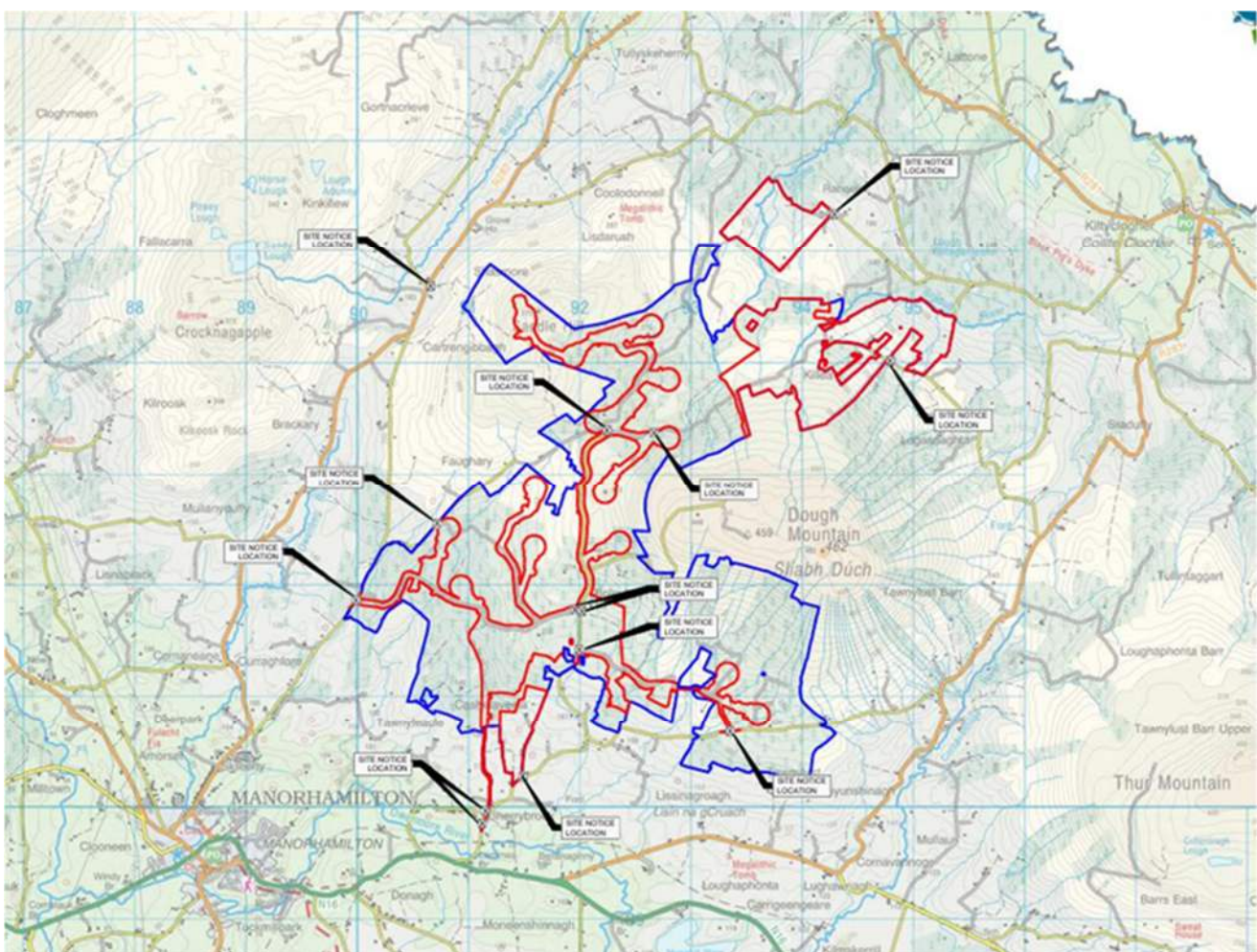


Figure 1: Application Site Boundary

The Grid Connection Route extends from the proposed 110 kv substation (subject to a separate planning application) southwest along the public road network for approximately 32km to the existing ESNB 110/220kV Srananagh substation in Co. Sligo. The proposed Grid Connection Route utilises the existing public road network where possible prioritising the use of Local and Regional roads to reduce likely significant effects. There are two bridge locations where the cable will extend offroad onto private lands to facilitate Horizontal Directional Drilling (HDD) beneath the River Bonet.

3. Planning Application History and Applicant's History

Section 2.3 of the submitted '*Planning Statement*' report documents the planning application history within the general application site. The Planning Authority would accept the accuracy of this assessment noting that the only planning permission granted within the application site relates to a new forestry road entrance and security barrier at Lissinagroagh. The other 2 no. planning applications seeking permission for new forestry road entrance and security barriers were withdrawn before decisions were made. An application, ref. P21/110, seeking permission for the erection of a 100m meteorological mast together with all ancillary site works for a period up to 2 years for the purpose of measuring local climate conditions and collecting meteorological data at Boleyboy was similarly withdrawn following a request for Further Information from the Planning Authority. The proposed mast was east of turbine no. 10.

There would be a very low level of planning applications in the general area as a result of the nature of the land use, topography and underlying soil types. As already mentioned, the area is characterised by a low density of dispersed population with sheep farming visible in the upper slopes with afforestation.

This is the first planning application submitted by FuturEnergy in Co. Leitrim.

4. National and Regional Policy Context

The Planning Authority is generally satisfied that the Planning and Development Legal and Policy Context contained in Section 3 of the submitted *Planning Statement* in conjunction with the legislation, policy and guidance contained in Section 12.3 of Chapter 12 '*Climate*' of the submitted EIAR provides an accurate summary of the international, national and regional policy framework against which consideration of the proposed development would be assessed against. The Planning Authority sees no merit in repeating this narrative within this report. This report will therefore concentrate on the national Climate Action Plan 2025 as the most pertinent policy framework based on a recent Supreme Court decision on the Coolglass wind farm.

4.1 Climate Action Plan 2025

The most recent Climate Action Plan (CAP), CAP25 was the third update to the plan since the amended Climate Act was signed into law in 2021. CAP25 builds on CAP24, and together they provide a substantial national programme of measures to achieve a significant reduction in emissions to 2030 and beyond. Consultation on the next iteration is presently underway, closing on Monday 17 August 2026. The next CAP may well be in place when the Commission assesses the proposed Lissinagroagh wind farm development application.

CAP 25 lays out a roadmap of actions which will ultimately seek to lead Ireland to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

CAP25 reaffirms Ireland's commitment to transforming the electricity sector through a major expansion of renewable energy, with wind energy remaining the cornerstone of the strategy. The Planning and Development Act 2024 (as amended), the Renewable Energy Directive III and the revised National Planning Framework together will ensure greater alignment between national, regional, and local authority levels to deliver on the renewable electricity ambition.

Key relevant Wind Energy Provisions in CAP25

1. Onshore Wind Expansion

- CAP25 maintains the target of 9 GW of installed onshore wind capacity by 2030.
- Onshore wind is expected to provide a substantial share of the renewable electricity needed to achieve Ireland's target of 80% renewable electricity by 2030.
- Continued support is provided through planning reform, grid development and renewable electricity support schemes.
- Lifetime extensions and repowering at existing sites will be critical to ensuring that the 80% renewable electricity target is reached.

2. Offshore Wind Development

- Ireland retains its target of at least 8 GW of offshore wind capacity by 2030.
- CAP25 identifies offshore wind as critical for decarbonising electricity generation and enhancing energy security.
- Priority actions include:
 - Progressing offshore wind projects through planning and consenting processes.
 - Developing offshore transmission infrastructure.
 - Expanding port capacity to support construction and maintenance activities.
 - Advancing future offshore renewable energy auctions

3. Grid Infrastructure and Transmission

- CAP25 recognises that achieving wind energy targets depends on significant upgrades to the national electricity grid.
- The Plan supports:
 - Reinforcement of the transmission network.
 - Delivery of major grid projects by EirGrid and ESB Networks.
 - Increased grid capacity to connect new onshore and offshore wind farms.
 - Enhanced interconnection with neighbouring markets.

4. Renewable Electricity Target

- The Plan continues Ireland's objective of reaching 80% renewable electricity generation by 2030, with wind expected to provide the largest contribution.
- Wind generation already supplies a significant proportion of electricity demand, with CAP25 noting that wind generated almost 40% of Ireland's electricity in the first half of 2024.

5. Planning and Consenting Reform

- CAP25 supports reforms to accelerate renewable energy development, including:
 - Alignment of the planning system with climate objectives.
 - Implementation of provisions under the revised National Planning Framework.
 - Faster consent processes for renewable energy projects while maintaining environmental safeguards.

6. Renewable Electricity Support Scheme (RESS)

- The Plan continues the use of competitive auctions and support mechanisms to bring forward additional wind energy projects.
- RESS remains a key tool for attracting investment in both onshore and offshore wind developments.

7. Energy Security and Economic Benefits

- CAP25 highlights wind energy's role in:
 - Reducing dependence on imported fossil fuels.
 - Improving national energy security.
 - Lowering electricity-sector emissions.
 - Supporting regional economic development and employment.

In summary, CAP25 is primarily focused on delivering 9 GW of onshore wind and at least 8 GW of offshore wind by 2030, supported by accelerated planning processes, major grid investment, offshore infrastructure development, and renewable energy auctions. Wind power is expected to be the single most important technology in achieving Ireland's target of 80% renewable electricity by 2030 and meeting national climate obligations.

4.2 Conclusion

The Planning Authority would be satisfied that the principle of the proposed development is supported by the national and regional planning policy framework for renewable energy development. The proposed wind farm is also compatible with European, national and local climate change and renewable energy policy and legislation. Consequently, the Planning Authority considers that the principle of the use of the site for the purposes of wind energy generation to be an acceptable and sustainable use of the land from such a policy framework perspective.

5. Local Policy Context

5.1 Leitrim County Development Plan 2023-2029

This section provides a summary of the main provisions of the County Development Plan which are considered to be of particular relevance in the consideration of the submitted wind farm development. Whilst the Planning Authority are in the process of making Variation No. 1 to the County Development Plan 2023-2029, it does not have any material effect on the proposed development.

Section 2.2 – Vision and Strategic Aims sets out a range of strategic aims and complementary strategic objectives for the sustainable development of the county, including “*development that addresses climate change in terms of adaptation and mitigation measures including increasing flood resilience, the promotion of sustainable transport options and the development of renewable energy technologies where possible to achieve a successful transition to a low carbon economy*”.

Section 4 – Economic Development – sets out the policy framework for the economic development of the county across a number of sectors including tourism, rural-based enterprise and employment, infrastructural and renewable energy.

Section 5 – Tourism contains a number of policies and objectives targeting tourism development within the county including the development of amenity and recreational assets / facilities and harnessing the county's natural and heritage resources in a sustainable manner for tourism activities.

Section 9 – Infrastructure and Energy – sets out the policy framework aimed at supporting and further developing the physical infrastructure within the county across a number of services such as water supply, wastewater, surface water and flood alleviation infrastructure, telecommunications and energy supply, including infrastructure associated with renewable energy development.

This includes Energy Networks Infrastructure whereby the development of secure and reliable electricity transmission infrastructure is recognised as a key factor in supporting economic development and attracting investment to an area.

The following policy is of relevance:

ENI POL 2 To co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure that the energy needs of future population and economic expansion within designated growth areas and across the wider region can be delivered in a sustainable and timely manner, which minimises impacts on environmental sensitive and high visual quality areas and that capacity is available at local and regional scale to meet future needs.

This section also deals with *Water Quality* in Section 9.5. The section outlines that Leitrim County Council has an important role to play in the protection, maintenance and improvement of water quality through the planning and management of future development.

The following policies and objectives are of relevance:

WQ POL 1 To protect existing groundwater sources and aquifers in the county and to manage development in a manner consistent with the protection of these resources.

WQ POL 2 To support the preparation of Drinking Water Protection Plans and Source Protection Plans to protect sources of public water supply, in accordance with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, the Council supports mitigation and protection measures for all protected areas, including Drinking Water Protected Areas.

WQ POL 9 To permit new development only in instances where it has been demonstrated to the satisfaction of Irish Water that there is sufficient capacity (in compliance with the Water Framework Directive and River Basin Management Plan) for appropriate collection, treatment and disposal of wastewater to cater for the anticipated loading arising from the proposed development.

WQ POL 10 To assess proposals for development in terms of their impact on human health to include, inter alia, the potential impact on existing adjacent developments, on existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation measures shall be introduced in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level.

- WQ OBJ 2** To achieve our targets of attaining and maintaining a minimum of 'good status' in all water bodies in compliance with the Water Framework Directive and to co-operate with the implementation of the National River Basin Management Plan 2018-2021, and subsequent replacement plans. This includes contributing towards the protection of Blue Dot catchments and drinking water resources whilst having cognisance of the EU's Common Implementation Strategy Guidance Documents No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.
- WQ OBJ 4** To ensure that development will not have an unacceptable adverse impact on water quality including surface water, ground water, designated source protection areas, river corridors and associated wetlands.

Flood Risk Management is also contained within this section of the Development Plan.

- FRM POL 2** To ensure that a flood risk assessment is carried out for any development proposal, in accordance with the Planning System and Flood Risk Management (DoEHLG/OPW 2009) and Circular PL2/2014. This assessment shall be appropriate to the scale and nature of risk to the potential development.
- FRM POL 9** To ensure that in assessing applications for developments, that consideration is had to the impact on the quality of surface waters having regard to targets and measures set out in the River Basin Management Plan for Ireland 2018-2021 and any subsequent local or regional plans.
- FRM POL 10** Development proposals will need to be accompanied by a Development Management Justification Test when required by the Guidelines. Where only a small proportion of a site is at risk of flooding, the sequential approach shall be applied in site planning, in order to seek to ensure that no encroachment onto or loss of the flood plain occurs and/or that only water compatible development such as 'Open Space' would be permitted for the lands which are identified as being at risk of flooding within that site.

Section 10 – Rural Development – addresses a number of rural-based economy sectors including agriculture, forestry, extractive industries, and renewable energy.

Section 11 – Heritage & Biodiversity – addresses the built, cultural and heritage assets of the county and sets out the policy framework for the protection and sustainable management of such assets. This section also references two separate plans, the Leitrim Heritage Plan 2020-2025 and the Leitrim Biodiversity Action Plan 2022-2027. Please note that both of these plans remain effective with the replacement Leitrim Heritage Plan 2025-2030 due to be approved in September.

Section 11 also addresses and provides policy content in relation to various land cover types within the county such as wetlands, woodlands/forestry areas and peatlands. Moreover, **Section 11.13 – Landscape** provides the policy framework for the conservation of landscape character areas, designated sensitive landscape and protected views and prospects. Related to this section, the assessment of the proposed development shall also have regard to the contents of the following appendices to the Leitrim County Development Plan 2023-2029: **Appendix VII – County Leitrim Landscape Character Assessment; Appendix VIII – County Leitrim Landscape Designations and Appendix IX – County Leitrim Views and Prospects**, which inform the policy framework provided in Section 11.13 of the Plan.

County Leitrim Landscape Character Assessment

In the case of this subject application, the proposed wind farm site is located within Landscape Character Type 5 (Moorland Plateau), Type 6 (Moorland Hills) and Type 7 (Upland Farmlands and Foothills) with the area of the proposed access road and upgrade of existing access road in Cherrybrook located in Type 8 (Valley Farmland).

Considered of more significance, the vast majority of the application site is located in Character Area (LCA) 4 – Arroo and Mountain Outliers. LCA 4 is described as *“a large mountain complex which rises above Lough Melvin, Glenade and Lough MacNea Upper. It has contrasting elements of moorland plateaus, moorland hills and farmed slopes. The area is dominated by Arroo Mountain, which rises to 523m AOD. Other summits include Sheenun, Dough Mountain and Thur Mountain reaching 421, 462 and 410 m AOD respectively. These summits are separated from each other by high, remote, settled valleys. The range and quality of habitats and the variety of rare species has resulted in Arroo Mountain being designated as a Special Area of Conservation and proposed Natural Heritage Area and along with Ben Bulbin has been called the botanically richest mountain in Ireland. The moorland plateaus associated with these mountains is remote and relatively inaccessible although appreciated visually from the valleys below and lowland areas further south. Field pattern is generally absent at the higher elevations. On lower slopes, field pattern is defined by hedgerows and in some cases post and wire fencing. The screening effect of hedgerows and woodlands creates more intimate landscapes.”* It is not considered that the element of the application site contained immediately north of the N16 National Primary Road has any particular significance from a landscape assessment viewpoint noting that this is located in Character Area 9 – The Northern Glens and Central Lowlands.

On Dough and Thur Mountains, sandstone and shale predominate, creating smoother profiles and a gentler plateaus landscape. Rocky streams draining off the sodden hills have cut narrow valleys. Waterfalls tend to be found where streams cross harder layers. Fowley's Falls, a series of cascades on Glenaniff River are one of the best known of these features. The lower hill slopes and valleys are more gently sloping and shelve gradually into the drumlin farmland, glens and loughs which fringe the upland. Aughty Series peat soils occupy the moorland plateaus and hills. On the lower slopes, there are gley soils originating from the underlying bedrock. The land cover of Dough and Thur mountains feature large tracts of commercial coniferous forestry in regular blocks of uniform age on large proportions of the moorland hill slopes and lower gentle farmed slopes. These tend to mask the underlying features and varied terrain which are crucial in the appreciation of the landscape.

With regard to landscape quality, condition and sensitivity of LCA 4, the County Leitrim Landscape Assessment states

“The upland part of this landscape, comprised of mountain moorland, features remote, wild, windswept and relatively undeveloped areas which have a particular unique scenic quality.

This landscape is generally considered to be in good condition albeit with some signs of dereliction in the lowland farmed areas where post and wire fences have replaced hedgerows. Wind turbines in the vicinity of Saddle Hill confer a developed character to this particular area which affects the underlying landscape character. The extensive and largely inaccessible plateaus are generally in good condition although overgrazing and peat extraction threatens delicate and sensitive habitats. The condition and true character of the landscape around Dough Mountain is considerably undermined by extensive commercial coniferous forestry. This has eroded the key landcover characteristics such as vegetation patterns and field boundaries.

The landscape is valued as recognised in the County Designations and the valued and sensitive attributes documented above.

The areas of moorland plateaus are particularly sensitive to change owing to the distinctive character of the mountain skylines, scenic quality, wilderness like quality and visual openness. These landscapes present as distinctive skylines and landmarks viewed from much of the surrounding lowlands. They are sensitive to changes which would interfere with important unique skyline views available from the lowlands."

With respect to *Forces for Change* currently visible in the landscape in addition to commercial forestry plantations in the vicinity of Dough Mountain and Saddle Hill, the LCA states:

"Areas of search for wind turbines have been identified within this LCA according to the Leitrim Renewable Energy Strategy indicating potential for future development in the form of additional wind farms and single wind turbines. This would need to have regard to the sensitive upland landscapes and cliff slopes together with the adjacent lowlands including Lough Melvin and Glenade Valley."

Finally, with respect to Conservation Objectives, specific recommendations, in addition to the need to conserve sensitive and valued landscape attributes identified above, the LCA states:

- Traditional stone wall boundaries and hedgerow boundaries are preferable to post and wire fences;
- Manage peat extraction and other activities to conserve the moorland and mountain habitats. Maintain ecological value of habitats by establishment of a sustainable grazing regime on the mountains;
- Retention of open areas of mountain moorland, heath and grassland. Retain views to and from these mountain skylines and lowland farmland; and
- Management and control of invasive alien plant species (IAPS).

County Leitrim Landscape Designations

The County Development Plan 2023-2029 identified designated areas of landscape (Appendix VII), distinguishing between Areas of Outstanding Natural Beauty (AONB) and Areas of High Visual Amenity (AHVA).

AONB (Area of Outstanding Natural Beauty) – A landscape of outstanding natural beauty attributed largely to natural characteristics such as landform, vegetation cover and habitat, geological features, scarcity or absence of development or man-made built elements and areas of wilderness.

AHVA (Area of High Visual Amenity) – A landscape of high visual amenity owing to a range of factors including natural, cultural and man-made influences.

There are no Special Amenity Area Orders in Co. Leitrim.

B3 Dough Mountain encompasses most of the application site of the proposed wind farm application. The area is shown by the black dashed line in Figure 2 overleaf. Delete blank page

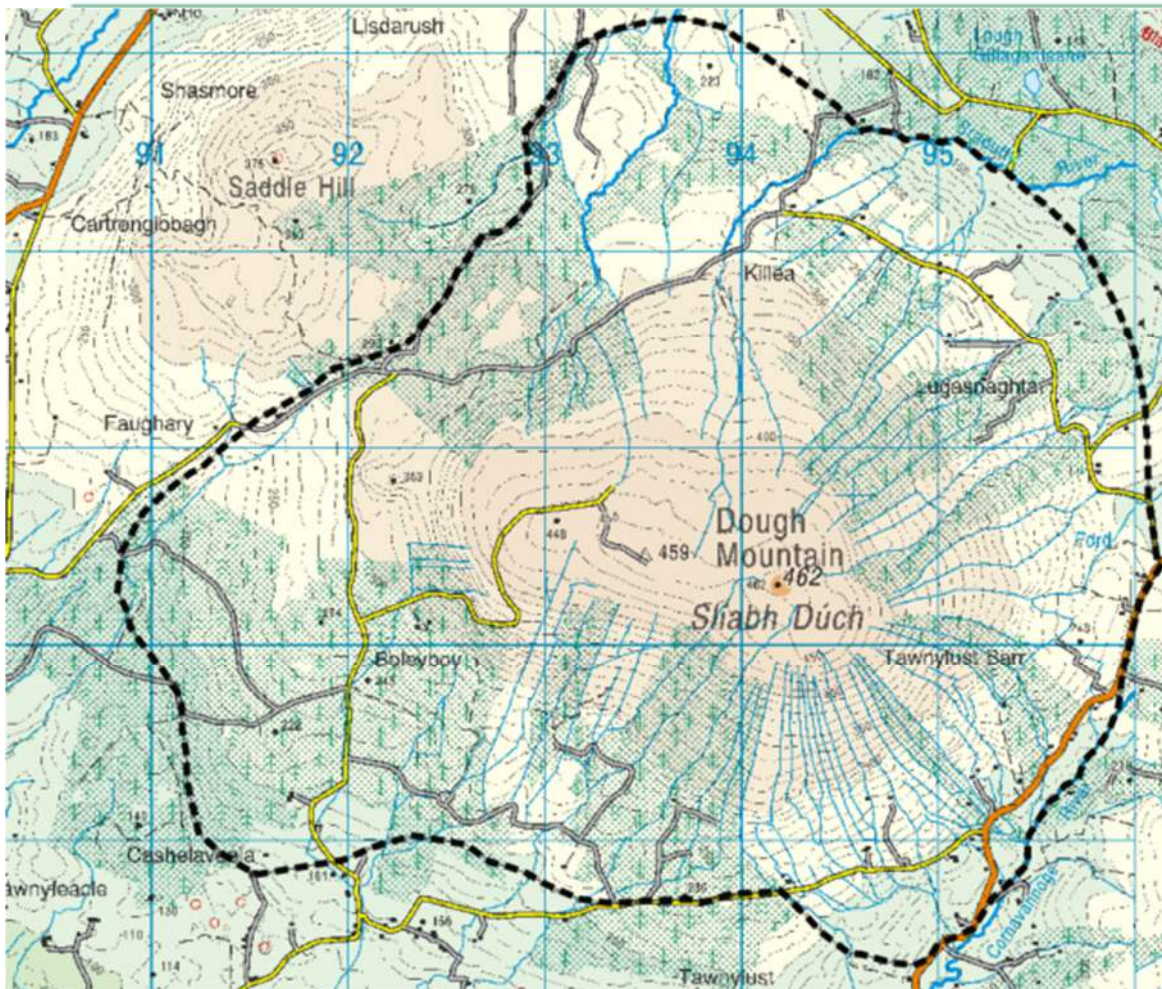


Figure 2: B3 Dough Mountain, Area of High Visual Amenity – Appendix VIII County Leitrim Landscape Designations

The Key Characteristics are stated as follows:

The moorland plateau associated with the summit of this mountain (above the 450m contour) is a remote and visually open area due to the scarcity of woodland vegetation. The main landcover is bog and there is very little built development thereby conferring a sense of wildness to this area. The summit of the mountain presents an important scenic skyline as backdrop to the surrounding valleys. The visual openness of this landscape facilitates long range dramatic views towards adjacent mountain ranges. The landscape is rural and remote with high levels of tranquillity away from roads.

The landscape below the 450m contour features extensive plantation coniferous forestry which is a detracting element. The presence of an extensive network of small roads within the commercial plantation forestry and also wind turbines are detracting elements which undermine the scenic quality as purpose of the designation.

Section 4.6.4 provides the recommendation of the Landscape Designation:

Whilst the assessment indicates that panoramic views are attained of the surrounding landscape from the summit, there is a locked field gate which prevents access to the summit. Dough mountain has a rounded profile which is recognisable and confers a sense of place to the surrounding local area. A sense of remoteness and tranquillity is experienced away from minor roads, wind turbines on Saddle Hill and plantation coniferous forest.

The designation of this area stands due to its key characteristics, in particular, the mountain summit and surrounding elevated areas with the outlook towards adjacent hills and valley landscapes. Despite the detracting influence of the wind turbines on Saddle Hill and plantation coniferous forest on the lower slopes which have partially altered the character of the landscape, the boundary of the AHVA remains in recognition of the skyline of the mountain summit which is deserving of protection.

The Special Qualities and Statement of Importance in section 5.2.3 is as follows:

Dough Mountain is an upland landscape with a smooth rounded mountain skyline which overlooks the valley landscape to the south presenting a recognisable skyline and conferring a sense of place on the local area. Visitors at elevated locations can enjoy panoramic views of the adjacent hills and lowlands. The mountain summit and surrounding elevated areas features a landcover of peat bog and is generally remote and tranquil. The importance of this landscape and hence its inclusion in an AHVA designation is attributed to the following special qualities:

- *Mountain moorland landscape at higher elevations is remote and tranquil away from minor roads;*
- *Panoramic views of the valley landscapes and surrounding hills from elevated locations;*
- *Moorland landscape features naturally occurring peat bog landcover; and*
- *High levels of tranquillity and sense of remoteness away from settlements and roads and wind turbines on the adjacent Saddle Hill.*

AHVA B4 Thur Mountain is located to the east of the R282 linking Manorhamilton to Rossinver. The importance of this landscape and hence its inclusion in an AHVA designation is attributed to the following special qualities:

- Mountain moorland landscape at higher elevations is remote and tranquil away from minor roads;
- Panoramic views of the valley landscapes and surrounding hills, including Dough Mountain from elevated locations;
- Moorland landscape features naturally occurring peat bog landcover throughout along with small areas of heathland;
- Cullentragh Lough is a naturally occurring lake in the upland moorland landscape; and
- High levels of tranquillity and sense of remoteness away from settlements and roads.

County Leitrim Views and Prospects

Appendix IX of the County Development Plan contains 'County Leitrim Views and Prospects' which are protected in the plan. The statement on the special qualities associated with each of the proposed views is documented along with a photograph of the view. The County Development Plan states in *Section 11.16.1 Development Management* that the landscape of the county has many vantage points which offer attractive panoramic views of high-quality landscapes. These scenic views are of amenity and tourism value and contribute to our quality of life. It is not envisaged that the designation of a protected view would prohibit all development within the view, rather any development proposed within the view should be designed and located so as not to obstruct the view or be unduly intrusive in the landscape as seen from these vantage points.

Landscape Policies and Objectives

The relevant policies and objectives contained in the County Development Plan in relation to *Landscape* are as follows:

- LCA POL 1** To conserve and enhance the high nature conservation value of the Landscape Character Areas in order to create/protect ecologically resilient and varied landscapes.

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- LCA OBJ 1** To protect and enhance the quality, character, and distinctiveness of the physical, visual and scenic character of landscapes of the county in accordance with national policy and guidelines and the recommendations of the Leitrim Landscape Character Assessment (2020) which forms Appendix VII of this Plan.
- LCA OBJ 2** To ensure that the management of development will have regard to the value of the landscape, its character, importance, sensitivity and capacity to absorb change as outlined in Appendix VII of this Plan - Leitrim Landscape Character Assessment (2020) and its recommendations.
- LD POL 1** To safeguard the protected views and prospects contained in Table 11.8 and identified on Map No. 11 (Volume III - Book of Maps) from intrusive development which would interfere unduly with the character and visual amenity of the landscape.
- LD POL 2** To protect areas of Outstanding Natural Beauty and Areas of High Visual Amenity from inappropriate development and reinforce their character, distinctiveness and sense of place.
- LD POL3** To permit development in an area of High Visual Amenity only where the applicant has demonstrated a very high standard of site selection site layout and design and where the Planning Authority is satisfied that the development could not be accommodated in a less sensitive location.
- LD POL4** To require that a landscape and visual impact assessment, prepared by a suitably qualified professional, be submitted with planning applications for development which may have an impact on the landscape character of the area.
- LD POL5** To ensure that development proposals have regard to the Landscape Character Assessment, the value of the landscape, its character, importance, sensitivity and capacity to absorb change.
- LD OBJ 1** To protect the quality, character and distinctiveness of the landscapes of the county.
- LD OBJ 4** To protect areas of Outstanding Natural Beauty and Areas of High Visual Amenity from inappropriate forms of development. These areas are identified in Table 11.6 and Table 11.7 of this plan and shown graphically on Map No. 10 '*Landscape Designations*' shown in Volume III (Book of Maps).

Heritage & Biodiversity Policy Framework

Other relevant policy context associated with the Leitrim CDP 2023-2029 in respect of the proposed development include the policy framework outlined in **Chapter 11 – Heritage & Biodiversity**. The following policies and objectives are relevant in the context of the proposed development:

- NH POL 1** To protect and conserve Special Areas of Conservation and Special Protection Areas.
- NH POL 2** To implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive, to ensure that Appropriate Assessment is carried out in relation to works, plans and projects with the potential to impact European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, and the Planning and Development Act 2000, as amended as relevant.

- NH POL 3** To protect designated Natural Heritage Area (NHA) sites, including proposed Natural Heritage Area sites (pNHA) and seek to develop linkages between designated sites and other non-designated sites of ecological importance, where feasible and as resources permit.
- NH POL 4** To consult with relevant prescribed bodies, such as the National Parks and Wildlife Service (DoHLGH), and take account of any licensing requirements when undertaking, approving and authorising development which is likely to affect plant, animal or bird species or habitats protected by law.
- NH POL 5** To ensure that development does not have a significant adverse impact on plant, animal or bird species or habitats protected by law, subject to satisfactory mitigation measures.
- NH POL 6** To protect and where possible enhance wildlife habitats and landscape features which act as ecological corridors/networks and stepping stones, such as river corridors, hedgerows and road verges, and to minimise the loss of habitats and features of the wider countryside (such as ponds, wetlands and trees) which are not within designated sites.
- NH POL 7** To treat the uplands of North Leitrim located above the 160 metre contour, as an ecologically-sensitive entity, where these uplands are not already designated as such.
- NH POL 8** To protect ecological networks linking protected and designated important sites within the county, in accordance with Article 10 of the *Habitats Directive*.
- NH POL 9** Biodiversity: To ensure that appropriate mitigation and/or compensation measures... are required where habitats are at risk or lost as part of a development.
- NH POL 10** To ensure the protection, conservation and enhancement of the biodiversity of the county.
- NH OBJ 1** To ensure that no project or programme giving rise to significant adverse, direct, indirect, secondary or cumulative impacts on the integrity of any Natura 2000 site(s), having regard to their qualifying interests and conservation objectives, arising from their size, scale, area or land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either alone or in combination with other plans or projects)¹.
- NH OBJ 2** To protect and conserve those sites designated as Special Areas of Conservation (SACs) during the lifetime of this Plan. The list of current SACs is contained in Table 11.1 of this Chapter.
- NH OBJ 3** To protect and conserve those sites designated as Special Protection Areas during the lifetime of this Plan. There is current one SPA in Co. Leitrim which is contained in Table 11.2 of this Chapter.
- NH OBJ 4** To protect and conserve Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) that become designated and notified to the Local Authority during the lifetime of this

¹ Except as provided for in Article 6(4) of the Habitats Directive which states that there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

Plan. The list of current NHAs and proposed NHAs are contained in Table 11.3 and 11.4 of this Chapter.

- NH OBJ 5** To protect the character, appearance and quality of the habitats and semi-natural features in Co. Leitrim such as woodlands, hedgerows, peatlands, wetlands and artificial waterways of historic or ecological importance.
- AGI POL 2:** To protect County Geological Sites from inappropriate development.
- PEAT POL 1** To conserve peatlands and protect peatland landscapes within the county.
- PEAT POL 2** To seek hydrological reports for significant developments within and close to peatlands, to assess potential impacts on the integrity of the peatland ecosystems.
- TWH POL 1:** To discourage felling of healthy mature trees and encourage retention within developments to the maximum extent practicable.
- TWH POL 2:** To require planting of native broadleaved species and species of local provenance in new developments as appropriate.
- TWH POL 3:** To support schemes and initiatives that establish/enhance woodlands for recreational and wildlife benefits.
- TWH POL 4:** To protect and preserve existing hedgerows and minimise their removal; where removal is necessary, seek replacement with new native hedgerow material.
- IS POL 1** To require relevant development proposals to address the presence or absence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan where such a species exists to comply with the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011-2015 and the EU Regulation on Invasive Alien Species 1143/2014.
- ARCH POL 1** To secure the preservation (i.e. preservation in-situ or in particular circumstances where the Council is satisfied that this is not possible, preservation by record as a minimum) of all archaeological remains and sites of importance such as National Monuments, Recorded Monuments, protected wrecks and underwater archaeological heritage, to include their setting and context.
- ARCH OBJ 2** To ensure that any development (above or below ground or underwater), within the vicinity of a site of archaeological interest or protected wreck or area of underwater archaeological heritage shall not be detrimental to the archaeological remains, character of the site or its setting.
- ARCH OBJ 3** To require, where appropriate, that an archaeological assessment or underwater archaeological impact assessment be carried out by a suitably qualified person prior to the commencement of any activity that may impact upon archaeological heritage, including underwater archaeological heritage.

Section 12 – Climate Action & Renewable Energy – addresses the various policy instruments associated with this development theme and sets out the various climate action measures, underpinned by a series of policies and objectives, aimed at mitigating and adapting to the effects of climate change. This includes policies and objectives relating to the renewable energy developments as informed by **Leitrim County Renewable Energy Strategy** and its companion document **Landscape and Visual Capacity Study for Wind Farms and Wind Turbines** which together form **Appendix X** of the Plan.

A number of overarching policies and objectives in relation to climate action mitigation and adaptation, including renewable energy development, are provided in Section 12 of the Plan, with the following policies and objectives considered to be of relevance in relation to the proposed development:

- CA POL 1** To support the implementation of the European, national, regional and local objectives for climate adaptation and mitigation detailed in Section 12.2.2 and Section 12.2.3 of this Plan.
- CA POL 2** To support the transition of the county towards a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050 by providing for consolidated development forms which facilitate the reduction of energy demand and greenhouse gas (GHG) emissions, and which supports sustainable travel patterns in line with the Core Strategy.
- RE POL 1** To encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.
- RE POL 2** To promote and support developments and actions that assist in achieving the national targets for energy from renewable resources and reducing greenhouse gas emissions associated with energy production.
- RE POL 3** To ensure environmental assessments for new energy developments should address reasonable alternatives for location. Where existing infrastructural assets such as sub-stations, powerlines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.
- RE OBJ 1** To seek to achieve a minimum of 200 MW of renewable electricity in the county by 2030, by facilitating renewable energy developments, including micro-generation renewable technologies incorporating solar, wind, hydro-electric and bioenergy.

Leitrim County Renewable Energy Strategy

To facilitate the sustainable growth of renewable energy technologies within the county, the *Leitrim County Renewable Energy Strategy* (RES) was prepared as part of the Plan and is included in Appendix X. The RES was prepared with the overall aim of the strategy to provide a plan led approach to renewable energy development in Co. Leitrim.

The RES is underpinned by an agreed vision as follows:

“To encourage and support the transition of Leitrim to a carbon neutral county through community engagement, energy efficiency and the sustainable development of renewable energy, whilst providing environmental and economic benefit at a local and national level and preserving the cultural heritage and visual amenity of the county”.

The RES contains a comprehensive assessment and spatial evaluation of the county to identify the most suitable locations for renewable energy technologies, taking account of available natural resources, grid infrastructure, environmental considerations, impacts on local communities and quality of life. It identifies the energy potential from different renewable resources to investors and communities which can be harnessed subject to detailed assessment at planning application stage. It states that:

Having combined the technical and mapping analysis (Step 1) and the Landscape and Visual Capacity Assessment (Step 2), opportunities for new wind farm are limited. There are no areas where new wind turbines would be considered 'acceptable in principle'

The basis for this conclusion is expanded upon and explained below.

A sieve analysis was undertaken to identify those areas which are potentially accessible for wind development (viable wind speed greater than 7.6 m/s) having regard to environmental, heritage and amenity features, but excluding landscape and visual amenity. This analysis took the following matters into consideration:

- wind speed and resource;
- environmental, ecological, heritage and amenity constraints by applying an exclusion zone around key biodiversity and physical attributes. Special Protection Area (SPA) and Special Area of Conservation (SAC) sites were excluded, however Natural Heritage Area (NHA) and proposed Natural Heritage Area (pNHA) sites were not excluded. Watercourses and physical constraints were also excluded using buffer distances related to construction activities and safety;
- land take being > 5 km² to take into account the spatial requirements generally for commercially scaled wind farm developments;
- set-back distances from housing using the minimum separation distance of 500m from all sensitive receptors as identified in the 2006 Wind Energy Development Guidelines (WEDG) and the 2019 Draft WEDG and as a means of identifying sites of strategic scale for the purposes of determining, more practically, the renewable energy target for the county as required under item (2) of the Specific Planning Policy Requirement (SPPR) prescribed in the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (2017), and;
- availability of grid infrastructure.

Figure 4 shows those areas in dark blue that are available, taking into account constraints posed by features such as European and Ramsar protected sites (also including waterbodies), heritage and monuments, settlements and existing infrastructure/ material assets. They also take into account a setback distance of 500m from all sensitive receptors consistent with the Wind Energy Development Guidelines (2006) and the draft revised iteration (2019). They do not take into account landscape/visual constraints amongst other environmental considerations. This is an important consideration which will be returned to in the assessment of the proposed development.

In Figure 5 (overleaf), the colour ramp displaying risk level in available areas has been defined by adding up the risk levels (5 for High, 3 for medium and 1 for Low) at certain distances from material assets, sensitive receptors, European Sites and from natural physical attributes (such as groundwater vulnerability, geological heritage sites, soil drainage, landslide and flooding susceptibility). The risk levels are aggregated and displayed on a scale ranging from High (maximum risk) to Low (minimum risk). However, the presence of a risk category in and of itself does not support nor preclude wind energy development. It is a tool which flags areas of having a higher or lower concentration/distance from various sensitive receptors.

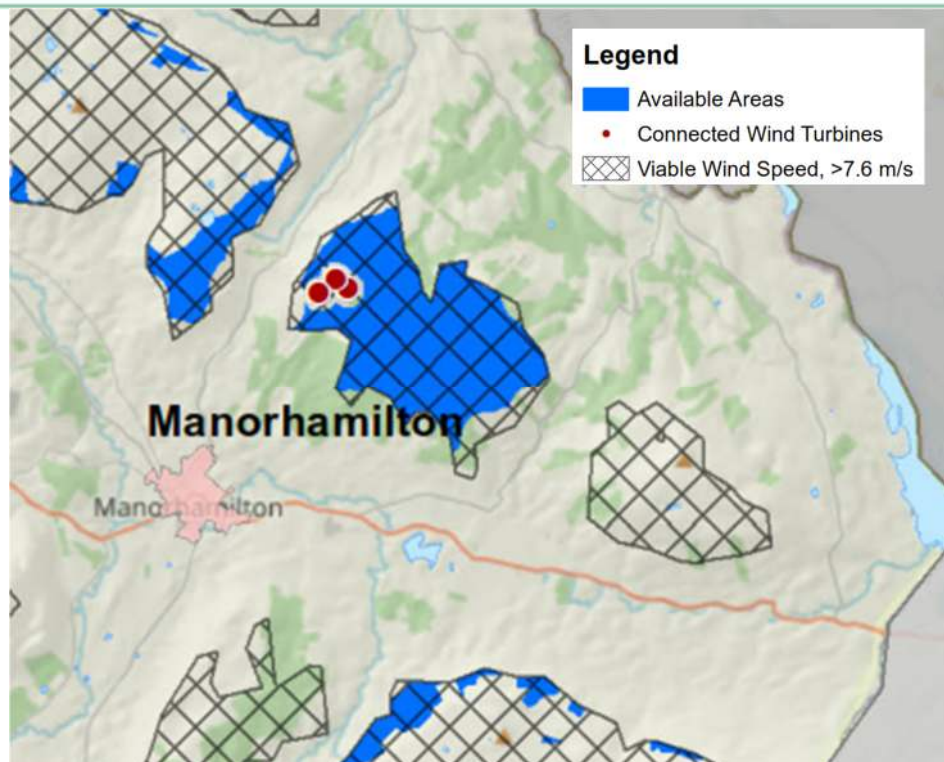


Figure 4: Wind Opportunities & Constraints, Leitrim Renewable Energy Strategy

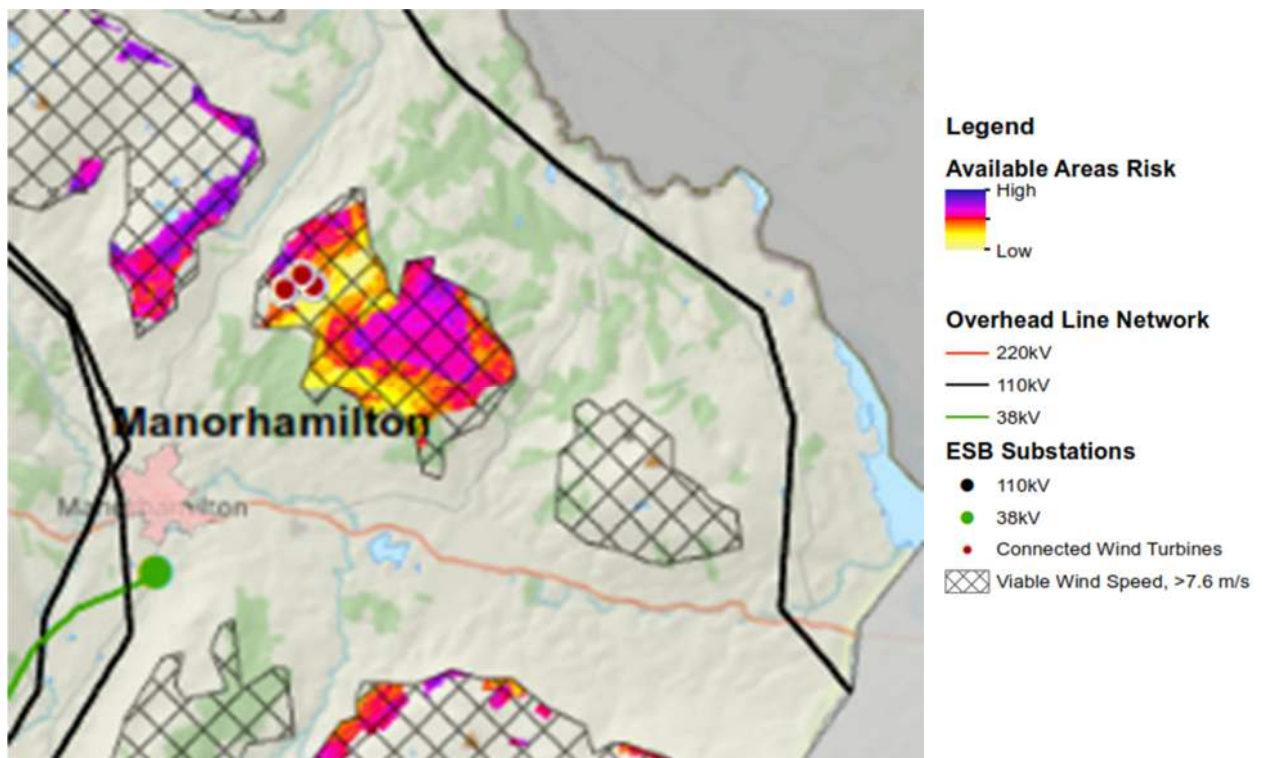


Figure 5: Wind Opportunities & Constraints – Risk Rating of the Available Areas, Leitrim Renewable Energy Strategy

A *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* was undertaken and provides a robust Landscape and Visual Capacity Study to specifically evaluate the respective capacities of various landscapes in the county to potentially accommodate larger scale wind energy development proposals.

The capacity study concludes that there is very limited capacity to absorb future large scale proposed developments in the form of multiple wind turbines and wind farms. This is due to a number of factors relating to landscape quality and scenic quality as follows:

- Scenic quality and expansive nature of these landscapes;
- Remote, tranquil and wild quality where the absence of man-made influences is a key characteristic;
- Intervisibility and relationship with adjacent landscapes for which the uplands are important to setting and present as a distinctive skyline or mountain backdrop;
- Presence of complex, distinctive and rugged landform;
- Landscape scale, at locations where field patterns defined by hedgerows convey a sense of a small-scale landscape in which the presence or visibility of wind turbines would dominate; and
- Proximity of settlements for which upland moorland and mountain areas are an important setting, which would be adversely affected by future wind turbines or wind farms.

The capacity study concludes that although scope for future wind energy development would be limited, each planning application for proposed development of this kind would have to be judged individually on its own merits.

The *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* provide the following summary and recommendations in respect of LCA 4 – Aroo and Mountain Outliers:

“The areas of search in the Aroo and Mountain Outliers LCA comprise upland landscapes, namely moorland plateaux, moorland hills and farmed foothills LCTs. These areas are generally open with little or no screening in views from the lower lying valleys and Lough Melvin. Landform varies from rolling, smooth rounded moorland hills to rugged mountain, cliffs and scree slopes which present as distinctive landforms throughout. The LCA overall is of some considerable scenic quality and would be highly sensitive to wind turbines. Some limited moorland areas in the vicinity of Dough Mountain and Saddle Hill may be considered subject to detailed design, having regard for landscape and visual constraints including potential cumulative effects with other wind turbines.”

The *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* states in the *Summary and Conclusions* section that there is “limited capacity to accommodate future development in the form of wind turbines and wind farms”. It is however acknowledged that areas of upland moorland where rolling landform and consistency of landcover could be deemed worthy of further assessment to ascertain capacity to accommodate a limited number of wind turbines. Such areas may also comprise altered landscapes due to man-made influences such as commercial forestry. These areas may include “Some limited moorland areas in the vicinity of Dough Mountain and Saddle Hill within LCA 4 Aroo and Mountain Outliers”. These are important considerations which will be returned to in the assessment of the proposed development.

The capacity study concludes overall that the areas of search comprise landscapes of considerable scenic quality for which, the introduction of wind turbines and wind farms would, in many cases, result in likely significant effects. However, each future planning application for proposed development of this kind would have to be judged individually on its own merits with reference to a landscape and visual impact assessment report (LVIA) undertaken in line with best practice guidance by an appropriately qualified landscape architect. The LVIA would also demonstrate that the design of the proposed development, in terms of number, hub height, tip height and siting of individual wind turbines has regard for the baseline landscape character and visual amenity of the study area in which the development would be located

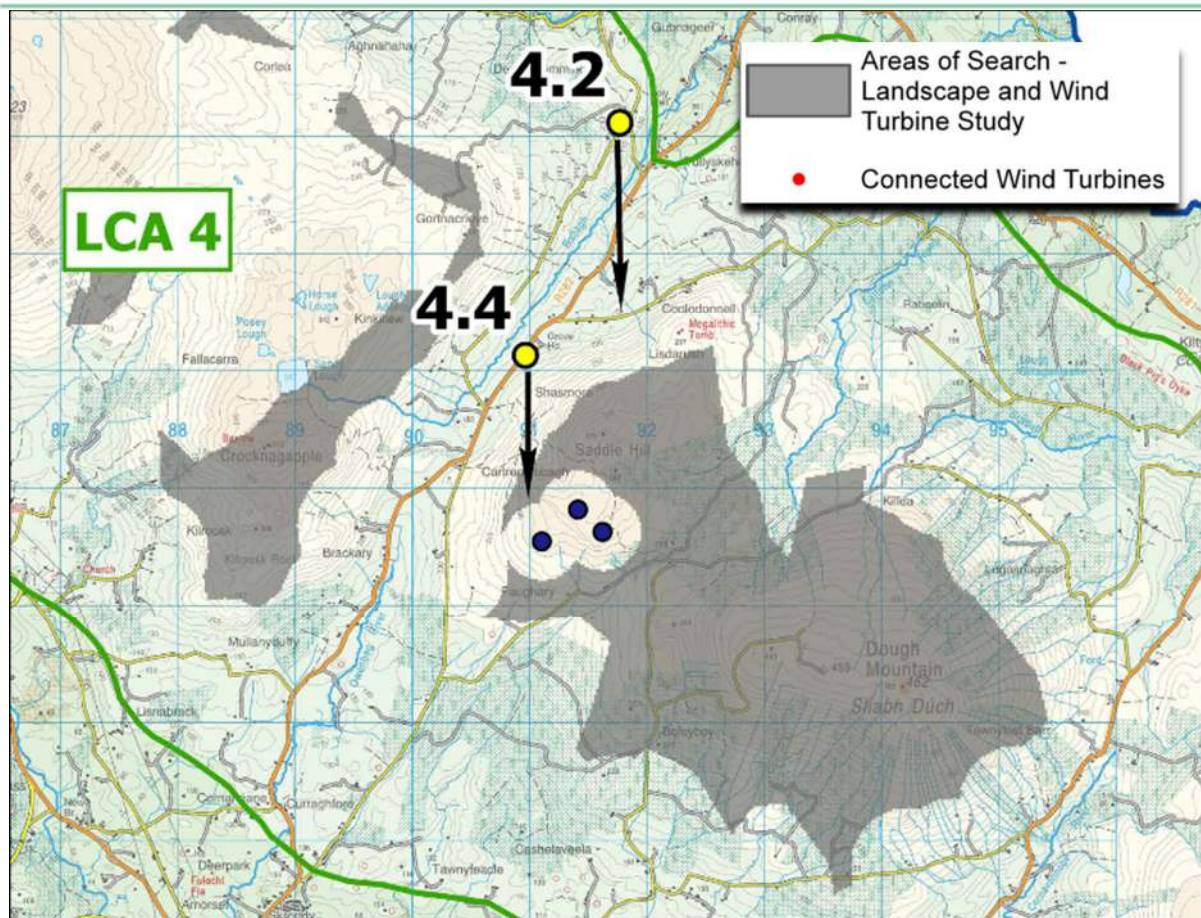


Figure 6: Extract from LCA 4 – Figure 1.2 Arroo and Mountain Outliers (Landscape Capacity Assessment for Wind Turbines).

Section 12.6.2 of the Plan directly relates to Wind Energy generation. It acknowledges that the Climate Action Plan (2019) included a target to expand onshore wind energy generation to 8,200 MW by 2030 (approximately doubling current installed capacity which sits at around 4,000 MW). An assessment of Leitrim's potential contribution to this target (up to 2030) is set out in Table 12.2 (see Figure 7) and corresponds with the estimated wind capacity / potential presented in the accompanying RES. The RES has identified the potential for Leitrim to increase its wind energy operational capacity by 90% in the period up to 2030, through a combination of repowering and extending existing wind farms and new wind farms. This aligns well with the national target for growth in onshore wind energy.

The Plan acknowledges that the figures provided do not represent a 'ceiling' or 'cap' on the potential of renewable energy that can be generated in the county up to 2030. The figures provided are seen as practicable and achievable targets for the county over this period. Moreover, the Plan notes the provisions of Action 102 of the Climate Action Plan 2021 which includes an objective to develop a new spatial policy for large scale wind and solar development, in support of the target to increase the share of electricity demand generated from renewable sources to up to 80% and that this will be implemented through a regional planning initiative. When implemented, this will give counties like Leitrim the platform to review and if necessary, revise upward the renewable electricity targets contained in this Plan. The updates to this Climate Action Plan and the National Planning Framework review will be dealt with in the next section.

This section emphasises that *"site suitability is an important factor in determining the suitability of wind farms, having regard to possible adverse impacts associated with, for example, residential amenities, landscape, including views and scenic routes, wildlife, habitats, designated sites, protected structures or bird migration paths,*

and compatibility with adjoining land uses. The Council is required to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the county to be harnessed in a manner that is consistent with proper planning and sustainable development.”

Existing Connected Wind Energy (2021)	92 MW
Additional indicative/ potential capacity included in the RES up to 2030.	83 MW (90% increase of existing)
Total 2030 Operational	175 MW

Figure 7: Co. Leitrim Wind Energy Target Potential to 2030 (Table 12.3 County Development Plan 2023-2029 Volume I Written Statement)

The following policies and objective from the Plan relate to wind energy development proposals:

- WE POL 1** To acknowledge the importance of wind energy in Co. Leitrim as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions.
- WE POL 2** To encourage the development of wind energy in suitable locations and in an environmentally sustainable manner to ensure the security of energy supply, in accordance with Government policy and the Leitrim County Renewable Energy Strategy.
- WE POL 3** To ensure that the assessment of wind energy development proposals will have regard to the following:
- sensitivities of the county's landscapes.
 - visual impact on protected views, prospects, designated landscapes, as well as local visual impacts.
 - impacts on nature conservation designations, archaeological areas, county geological sites, historic structures, public rights of way and walking routes.
 - local environmental impacts, including those on residential properties, such as noise and shadow flicker.
 - visual and environmental impacts of associated development, such as access roads, plant and grid connections from the proposed wind farm to the electricity transmission network.
 - scale, size and layout of the project and any cumulative effects due to other projects.
 - the impact of the proposed development on protected bird and mammal species.
- WE POL 6** To have regard to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to 'Wind Energy Development' and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance which may be issued.

WE OBJ 1 To secure the maximum potential from the wind energy resources of Co. Leitrim commensurate with supporting development that is consistent with proper planning and sustainable development of the area.

Section 13 – Development Management Standards sets out the general Development Management principles and standards that will be applied by the Council to ensure that future development is in accordance with the policies and objectives set out elsewhere in the Plan. Development Management Standards specific to energy, telecommunications and services, including wind energy development, are set out in Section 13.20.

The Standards reiterate that when assessing planning applications for wind energy development, the Planning Authority shall have regard to national guidance and the policy framework provided in Section 12 of Volume I - Written Statement and Appendix X of the Plan.

In addition, the following considerations will be taken into account by the Planning Authority in relation to any planning application for wind energy development:

- Impact on the visual amenities of the area.
- Impact on the residential amenities of the area.
- Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape.
- Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- Impact on nature conservation, water quality, ecology, including an assessment of impacts on collision risk species (birds and bats), soil, hydrology, groundwater, air quality, archaeology, built heritage and public rights of way.
- Impact on ground conditions and geology.
- Impact on peat stability and robust geotechnical assessment of potential for peat slippage.
- Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines.
- Impact of development on the road network in the area.
- Impact on human health in relation to:
 - Noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region).
 - Shadow flicker (for wind turbine developments, including detailed Shadow Flicker Study).

This list is not exhaustive, and the Planning Authority may consider other requirements in relation to traffic and transport assessments, road safety audits/road safety impact assessments, access onto public roads, haul route assessment etc. Section 13 sets out development management standards in relation to such items.

Section 13.20.4 of the Plan outlines the Development Management Standards relating to the undergrounding of cables. Proposals should demonstrate that environmental impacts including the following are minimised:

- Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties).
- Short to medium term impacts on the landscape where, for example, hedgerows are encountered.
- Impacts on underground archaeology.
- Impacts on soil structure and drainage.
- Impacts on surface waters as a result of sedimentation.

Conclusion

In general, the Leitrim County Development Plan 2023-2029 endorses the national and regional policies in terms of renewable energy. The Leitrim County Development Plan 2023-2029 contains a number of policies and objectives aimed at mitigating and adapting to the effects of climate change. This includes policies and objectives relating in support of suitable and sustainable renewable energy developments, including wind energy development, as informed by the *Leitrim County Renewable Energy Strategy* and its companion document *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* which together form Appendix X of the Plan. Specifically, RE OBJ 1 seeks to achieve a minimum of 200 MW of renewable electricity in the county by 2030, by facilitating renewable energy developments including micro-generation renewable technologies incorporating solar, wind, hydro-electric and bioenergy.

In this regard, it is noted that the majority of the site of the proposed wind energy development is located within an identified potential 'Available Area' as per Figure 6.3 (b) in Appendix B of the *Leitrim County Renewable Energy Strategy*. Such areas do not equate with an 'acceptable in principle' status for wind energy development. They take account of constraints for wind energy development such as certain distances from material assets, sensitive receptors, European Sites and from natural physical attributes and to highlight areas of the county with the potential to accommodate wind energy development subject to significant landscape / visual constraints amongst other environmental considerations.

Supplementing this spatial guidance contained in the *Leitrim County Renewable Energy Strategy*, is the *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines*. As noted in the policy context section of this report, the capacity study concludes that although scope for future wind energy development would be limited, each planning application for proposed development of this kind would have to be judged individually on its own merits. In the case of this subject application, the proposed wind farm site is primarily located within Landscape Character Area 4 – Arroo and Mountain Outliers. The *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* states that there is "limited capacity to accommodate future development in the form of wind turbines and wind farms, it is acknowledged that areas of upland moorland where rolling landform and consistency of landcover could be deemed worthy of further assessment to ascertain capacity to accommodate a limited number of wind turbines. Such areas may also comprise altered landscapes due to man made influences such as commercial forestry". These areas may include the following:

Some limited moorland areas in the vicinity of Dough Mountain and Saddle Hill within LCA 4 Arroo and Mountain Outliers.

Set within the aforementioned policy context and noting the location of the subject site within an area where there is identified potential for wind energy development and having regard to the presence of some limited capacity for such development in the general area of the subject site, it is considered that the general principle of the proposed development is acceptable to the Planning Authority. However, the suitability is predicated on other planning and environmental considerations being satisfied along with due consideration of the visual and landscape assessment of the scale of wind farm development now proposed.

5.2 Leitrim Climate Action Plan 2024-2029

In line with Section 14B of the Climate Action and Low Carbon Development Act 2015, as amended, and the Local Authority Climate Action Plan Guidelines; Leitrim County Council adopted the Leitrim County Council Local Authority Climate Action Plan 2024-2029 by resolution at a full plenary Council meeting on 19 February 2024.

The vision of the Climate Action Plan is aligned to the Government's National Climate Objective which seeks to achieve the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The Climate Action and Low Carbon Development (Amendment) Act 2021 frames Ireland's legally binding climate ambition to deliver a reduction in greenhouse gas emissions by 51% by 2030.

Leitrim County Council Climate Action Plan aims to enhance climate resilience, increase energy efficiency, and reduce greenhouse gas emissions, across Leitrim County Council's own assets, services, and infrastructure, whilst also demonstrating a broader role of inspiring, leading and facilitating other sectors, to meet their own climate targets and ambitions.

The Plan provides that Leitrim County Council supports development of renewable energy generation in accordance with the *Renewable Energy Strategy* and the development of a secure and renewable energy infrastructure that can contribute to national electricity grid decarbonisation targets and to support community-based renewable energy projects. This will include focusing on opportunities such as

- Support the development of renewable electricity generation in accordance with national and local policies.

The Actions on Sustainability & Resources Management include a series of objectives and actions to achieve same. One objective is to "*Support renewable electricity generation, transmission and use within the County in line with national and regional policy including the Electricity Storage Policy Framework*".

This includes Mitigation Action No. SR23

Renewable Electricity to be developed in accordance with Leitrim County Council's Renewable Energy Strategy (RES) and the National Renewable Electricity Spatial Policy Framework, to support sustainable development of renewable electricity. Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.

Mitigation Action No. SR24

Support safe, secure, reliable electricity grid infrastructure within the County to support renewable electricity generation, reinforcement, strengthening and integration of the transmission network to allow linkages with renewable electricity proposal consistent with RES. Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.

6. Legal Considerations

The Planning Authority would have expected that an application of this nature would have been accompanied by a map which would clearly outline the ownership of all of the lands included in the red line boundary of the proposed development and the blue line boundary of the submitted overall landholding included in the application for consent. What has been submitted is a series of letters which outlines land folios and the consent of the various landowners to the making of the application to An Coimisiún Pleanála. It is something which the Commission should give some thought to in their pre application consultations with perspective applicants. Again, without sight of the completeness assessment undertaken by the Commission, it is unclear if this matter was considered.

Nonetheless, the Planning Authority has examined each of the stated folios which are provided in Appendix IV of this report. What is clear from this assessment is that the applicants do not have the apparent consent of any

landowner to undertake alterations to roadside boundary treatments outside of the defined application site, which alterations, in the opinion of the Planning Authority, may be necessary to bring the turbines to their intended locations via the Turbine Delivery Route. This matter will be dealt with separately in the consideration of the roads and transportation elements of the proposed development.

7. Consideration of Alternatives

7.1 Overview

A review of reasonable alternatives was undertaken for the proposed Lissinagroagh wind farm to identify the option that best achieves the project objective of renewable energy generation while avoiding, reducing and managing potential environmental effects. The alternatives assessment considered the main options available in respect of site selection, wind farm layout and scale, associated infrastructure, grid connection, turbine delivery arrangements, technology choice, construction methodology and mitigation by design.

At site selection stage, the applicant undertook a structured screening exercise across the wider Coillte national landholding using environmental, planning, technical and commercial criteria. Sites were discounted where they were constrained by ecological designations, incompatible planning policy designations, inadequate wind resource, insufficient site area, or the absence of feasible grid access. On this basis, the subject site was identified as a suitable location for wind energy development due to its strong wind resource, relatively low density of nearby residential receptors, compatibility with the local renewable energy policy framework, absence of direct overlap with designated ecological sites, and practical access to both the road and electricity networks.

The alternative of not proceeding with the development was also considered. While this would avoid any project-related construction or operational effects, it would also result in the loss of an opportunity to generate renewable electricity at this location and to contribute to national climate action, energy security and greenhouse gas reduction objectives. It would also mean that the associated local employment, investment and community benefit opportunities arising from the project would not occur.

The design of the wind farm evolved through an iterative constraints-led process. It is stated in the submitted chapter of the EIAR that an initial layout of 20 no. turbines was refined to an 18-no. turbine layout and subsequently to the final 14-no. turbine design. The principal reason for this design evolution was to avoid or reduce potential impacts on identified environmental sensitivities, including sensitive habitats, hen harrier nesting and foraging areas, watercourses and more difficult terrain in the southeast of the site. The final layout was selected because it achieves a more balanced outcome, reducing the development footprint, excavation requirements, traffic volumes, visual influence and potential ecological effects when compared to the earlier alternatives.

It is outlined that alternative options for site infrastructure were similarly examined. Existing forestry tracks were utilised where possible in preference to constructing an entirely new internal road network, thereby minimising land disturbance, reducing the extent of excavation and limiting the number of watercourse crossings required. Alternative substation locations were also considered, with the preferred western location selected due to its flatter topography, greater separation from sensitive receptors, proximity to the principal site entrance, and more efficient connection to the selected grid route. This option was considered to represent the least environmentally constrained and most technically suitable location for the substation.

In relation to turbine delivery, alternative ports of entry and route options were assessed. Killybegs Port was selected as the preferred port of entry in preference to Galway, as it is closer to the site and allows for a shorter and more practical route for abnormal load deliveries. Alternative road based delivery routes were also

examined, including routes via the R280 and R282; however, these were discounted due to narrow carriageways, poor alignment, village constraints, greater need for temporary accommodation works and increased reliance on third-party lands. The selected turbine delivery route was considered the most feasible and least impactful option overall.

Several grid connection options were also studied. Loop-in options to the existing overhead line network were discounted due to insufficient available capacity. Several underground cable route options to the existing Srananagh substation were then assessed. Although the selected route was not the shortest available, it was preferred because it involved fewer bridge crossings, less horizontal directional drilling, fewer environmental constraints and reduced interaction with designated ecological areas when compared to the alternative routes. It was therefore identified as the most appropriate option from both a technical and environmental perspective. The applicant also considered alternative renewable energy technologies. Solar photovoltaic development was examined in principle but was discounted on the basis that it would require a substantially greater land take to achieve a similar electricity output, with correspondingly greater forestry felling, land disturbance and associated environmental effects. Wind energy was therefore considered the most effective and appropriate technology for the site. In addition, less intrusive construction techniques and best-practice mitigation measures were selected wherever feasible to minimise potential effects on watercourses, habitats and other environmental receptors.

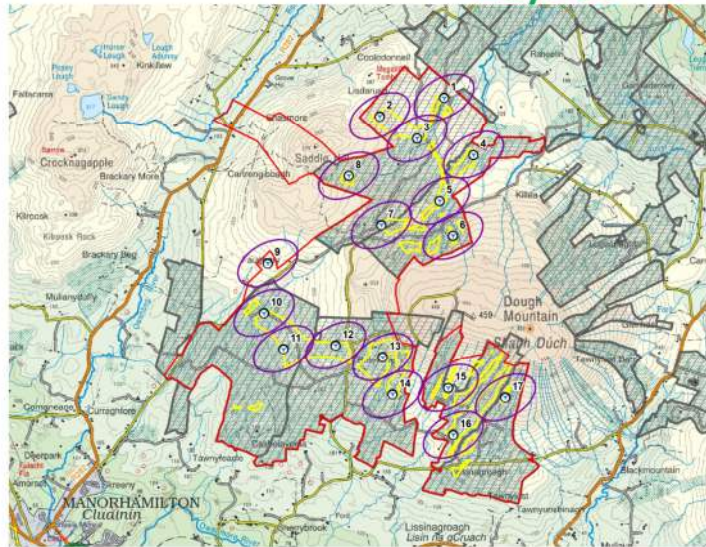
Overall, it is presented that the chosen development is the outcome of a robust alternatives assessment and iterative design process. The final proposal represents the option that best balances the efficient harnessing of the site's renewable energy resource with the avoidance and minimisation of environmental effects. The development has therefore been advanced on the basis that it constitutes the most suitable, feasible and environmentally acceptable option identified through the alternatives assessment process.

7.2 Assessment

The Planning Authority would accept that having regard to the scale of the landholding owned and managed by Coillte that this allows a more robust consideration of reasonable alternatives that would be presented in most EIARs. The EIAR describes the alternatives that were considered under the headings of '*Future Baseline*' i.e. without the proposed project proceeding which is akin to the 'do nothing' option, '*alternative locations*', '*alternative design / layouts*', '*alternative technology*', '*alternative timelines and construction methodology*' and '*alternative mitigation measures*'.

The Planning Authority were aware of the outcome of the 2014 Coillte screening process for wind farm suitability of their landbank initially through consultations on the Croagh wind farm development which remains before the Commission. The siting and design of the proposed wind farm has evolved through the consideration of alternative layouts some of which were presented at pre application consultations with the Planning Authority. Reference is made to an initial layout of 20 no. turbines which was refined to an 18- no. turbine layout and subsequently to the final 14-no. turbine proposal. The Planning Authority were presented with slightly different options than those stated in this chapter. In December 2020, initial indicative layouts for 17 no. and 22 no. turbines were presented to the Planning Authority. These slides are presented in Figures 8. At the next pre application consultation meeting with the Planning Authority in October 2021, the design had changed to 18 no. turbines as outlined in the chapter of the submitted EIAR (Figure 9). The design and layout of the submitted application was presented to the Planning Authority on 11th March of this year. Based on our discussions, the Planning Authority accepts that the final submitted layout and design was the outcome of an iterative process in relation to the number and positioning of the proposed wind turbines, substation and other infrastructure, as well as the interconnecting access tracks and other required infrastructure i.e. substation, grid connection and turbine delivery route.

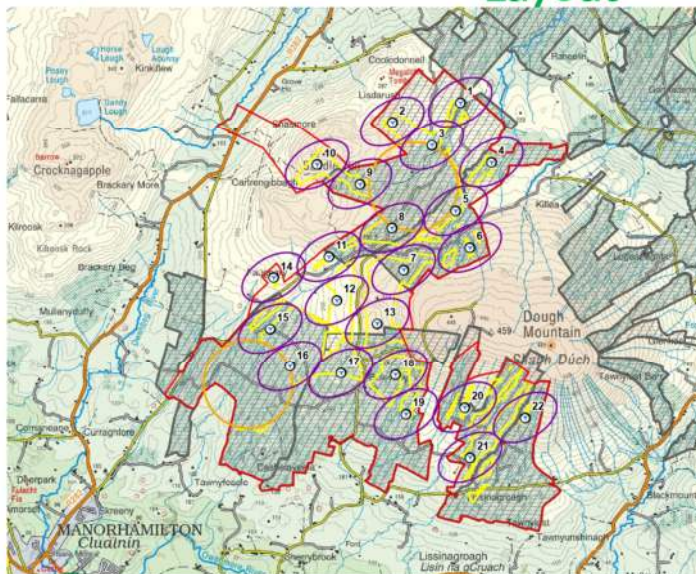
Indicative 17 WTG Layout



- Indicative layout
- Subject to refining based on finding of Baseline Surveys
- To be updated in Jan 21

TOBIN
CONSULTING ENGINEERS

Indicative 22 WTG Layout



- Indicative layout
- Subject to refining based on finding of Baseline Surveys
- To be updated in Jan 21

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Figure 8: Indicative 22 and 17 Turbine Layout (December 2020)

The Planning Authority is satisfied that the submitted chapter has clearly and sufficiently outlined the reasonable alternatives that were considered, including a 'do nothing' alternative, and sets out the reasons for selecting the chosen option, based on consideration of the environmental effects.

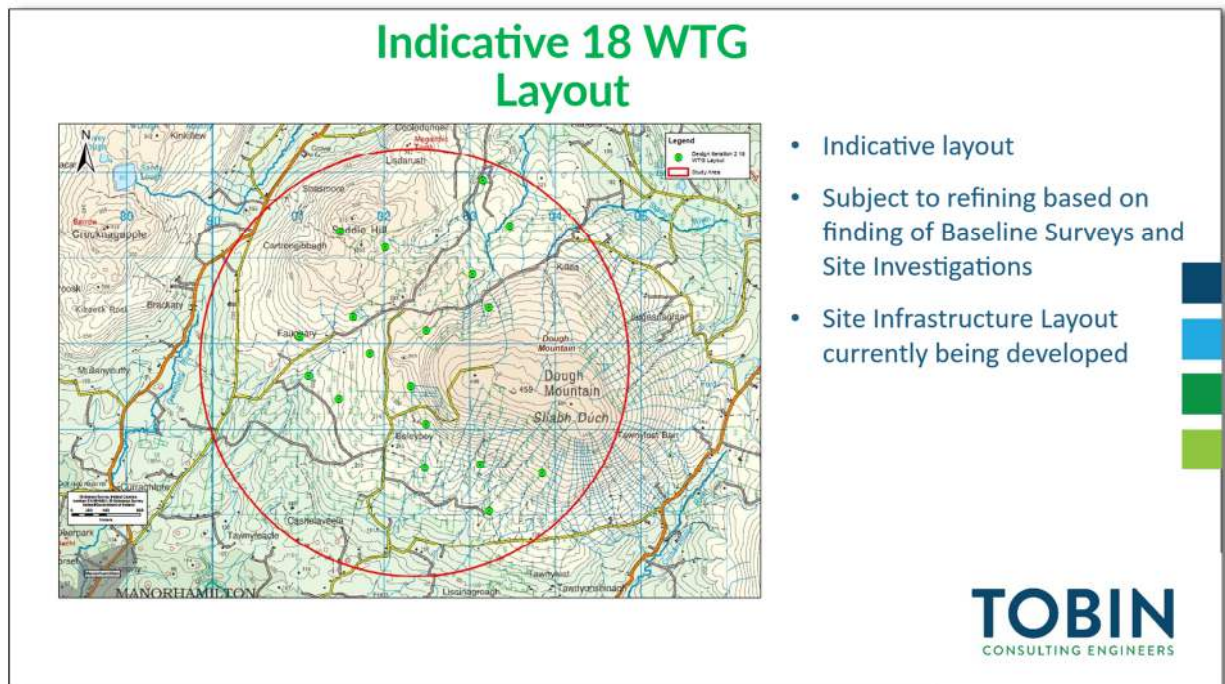


Figure 9: Indicative 22 Turbine Layout (December 2020)

8. Traffic Considerations

8.1 Construction Traffic

The application documentation states that it is estimated that construction will commence in March 2028 and will take approximately 24 months from initial site clearance and enabling works to commissioning. Figure 10 provides an overview of the local road network and the location of permanent and temporary accesses to the proposed wind farm site.

Access to the site for construction will be via a series of existing and proposed accesses off the local road network described as follow:

- Permanent Site Entrance 1 (Faughary Td.) will use an existing forestry site entrance on the L61801 which will be modified. The L61801 is a local road located directly to the west of the proposed project. The carriageway is approximately 4 metres wide in the vicinity of the site. This road connects the site of the proposed wind farm to Manorhamilton via the R282 Rossinver Regional Road. It branches off to form the L61802 which provides access to Faughary Wind Farm.
- Permanent Site Entrance 2 (Boleyboy Td.) is off the L1684 which is a local road connecting the project site to the N16. This will provide access to one of the proposed Borrow Pits.
- Permanent Site Entrance 3 (Boleyboy Td.) is also off the L6184 and is an existing forest access which will be modified and serves an existing internal roadway which connects back onto the L61844 again to an existing forest access. Both of these accesses will also be used for construction purposes.
- Permanent Site Entrance 4 (Boleyboy Td.) is also off the L6184 and will serve turbine no. 8 via a permanent site access parallel to the L61843 which travels to the summit of Dough Mountain until a gateway prevents onward travel.
- Permanent Site Entrance 5 & 6 (Boleyboy Td.) which will serve turbines 5 & 7 will also be accessed from the L6184 via a permanent site access which already exists.

- Permanent Site Entrance 7 (Faughary Td.) is north of the junction of the L6184, L61802 and L61803. It will use an existing access for construction and operation to serve turbines 1, 2, 3, 4 & 6. This is not off the L6184 as stated in Section 16.4.1 Accesses but not considered significant.

At Cherrybrook, located to the south of the proposed project, the proposal will include a temporary site access 1 for use during the construction phase. This is located opposite the entrance to Brookfield House. A new temporary road is proposed for construction purposes which will traverse the L6184 (referred to in the EIAR as an 'unnamed road') and then cross agricultural lands before connecting with existing internal forestry roads within the Coillte landholding. These crossings are designed to facilitate turbine component deliveries by avoiding a tight bend on the existing road and eliminating difficult turning manoeuvres, thereby minimising the extent of use of the public road network. Temporary Site Access 2 (Lissinagroagh Td.) will consist of a modified existing temporary entrance onto the L6184 to be used during construction and is referred to above in connection with Permanent Site Access 3.

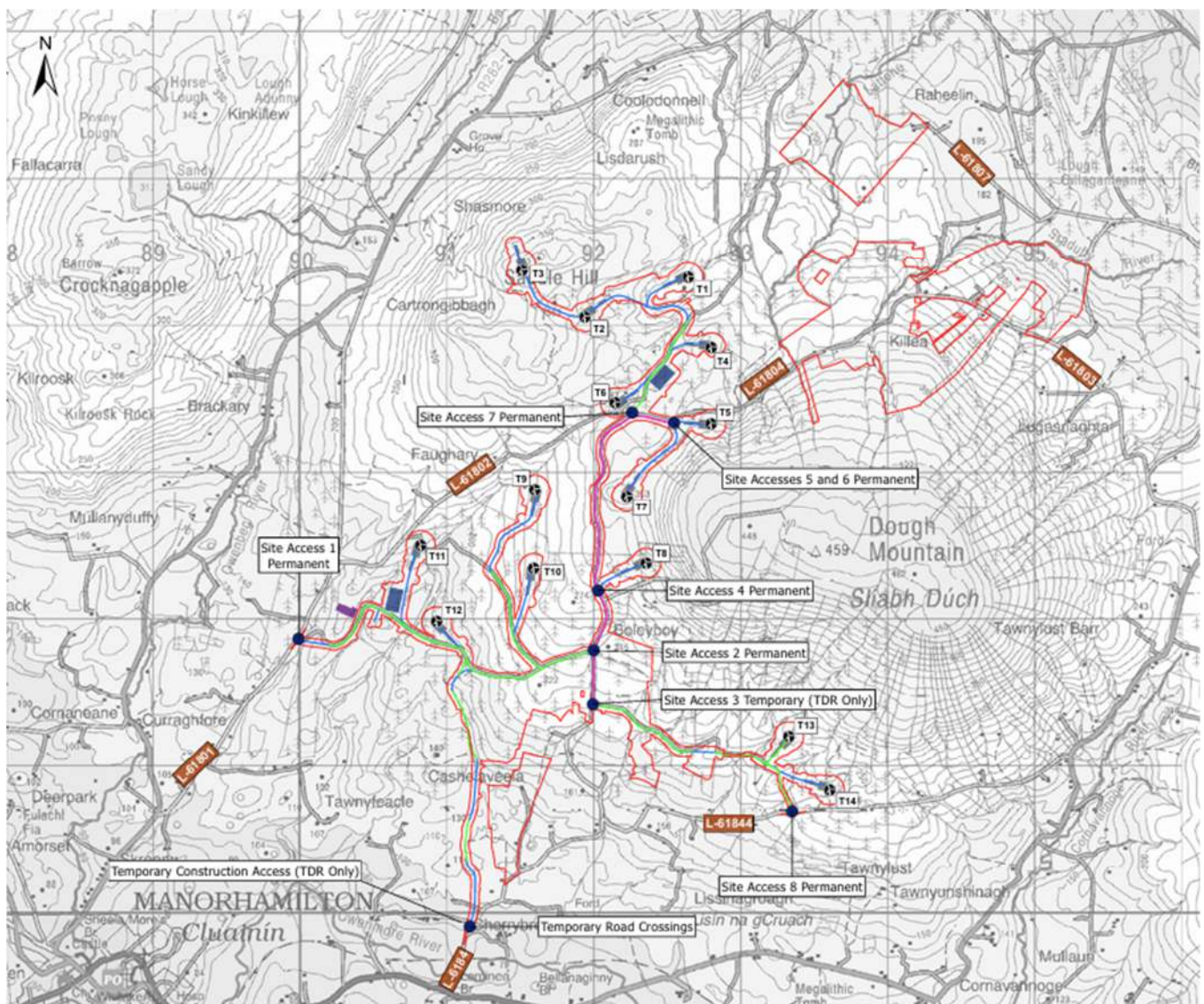


Figure 10: Road Network and Proposed Sites Entrances (Source: Figure 16.4 of EIAR)

A total of eight (8) no. passing bays are proposed along the L6184 to facilitate the safe movement of construction traffic and general road users along this section of the local road network. Drawings showing their location have been provided.

Approximately 7.95km of new access tracks and 8.35km of upgraded existing tracks will be constructed. Site access tracks will have a running width of approximately five metres (5.5 m including shoulders), with wider sections (which vary but are up to approximately 10.0m) at some corners and on the final approaches to turbine hardstands and are shown on the drawings accompanying the application. The proposed new tracks will include passing bays to allow traffic to pass easily.

A number of haul routes to the site have been considered with the source of the quarry material will be determined on appointment of a contractor. They are not therefore definitive.

8.2 Abnormal Indivisible Load (AIL) Haul Route

Killybegs Port is the anticipated port for the import of the AILs. The route selected for the AILs utilises the national road network as much as feasible from the port to the site. It is estimated that 23-38 no. delivery events will be needed on a maximum of 23-38 no. days for delivery of these oversized loads. The delivery route is expected to begin at the port of entry in Killybegs, Co. Donegal and proceeds southeast along the N56 around Donegal town. From there, it continues southwest on the N15 towards Sligo, before connecting to the N16 and approaching Manorhamilton, running along the N16 for approximately 2km before joining the L6184 to the proposed project site from the south. Turbine deliveries will take place outside of normal construction hours, primarily during nighttime, to take advantage of lower traffic volumes on public roads. These movements will be carried out under traffic management measures and accompanied by a Garda escort. Accommodation works along a significant portion of the route will not be required for the delivery of the AILs, as they have already been implemented as part of projects of a similar nature. A swept path analysis has been undertaken and is included in Appendix 2-1 of the EIAR.

8.3 Report from Roads Authority

A report has been prepared by the Mr. Darragh O'Boyle, Senior Engineer, Sustainable Transport following discussions with Mr. Paul McMahon, Senior Executive Engineer, South Leitrim District Engineer's Office. This report is contained in Appendix I of this report but is summarised herein. The report expresses a view that it would be advantageous if all construction traffic to the development was from the southern side along the N16 which would minimise the damage to the local road network. The report outlines that using the L-6180-0 at Skreeny Td. should not be permitted as this public road will not be able to survive platoons of HGV's and will require high investment to rectify any damage. The section of public road between the L-6184-0 and the L-6184-2 is not indicated as a haul route, however, the Roads Authority would need clarification that the private connector haul route between these sections of public road will be constructed and used to minimise damage.

The Roads Authority has concerns on how the developer proposes to strengthen the existing local road network that is proposed to carry construction traffic as some of these local roads are less than 3m wide with no verge or verge supports in place.

The report outlines that there are a number of small culverts along the haul route that will need to be surveyed, however, there is only one stone arch bridge (Leminea Bridge) which crosses the Owenmore River. The Roads Authority requires clarification on how the developers propose to protect this stone arch structure.

The report requires that quarry / concrete haulage during construction should remain on the national and regional road networks where possible. It is outlined within the application documentation that the L-4135 will be used for quarry supplies to the site. This will need to be clarified, and a possible alternative route will need to be identified.

The report recommends that the TII are consulted as part of the overall submission.

The report requires clarification of the permanency of the junction realignments on the local road L-6184-0/2/3 as the submitted drawings identify bollards and boundary fencing to re-establish the junctions once the development is complete. The report notes that passing bays are a welcome addition to any local roads and will need to be established for the proposed development HGV traffic. Again, the Roads Authority will require information of permanence and construction details. Liaison and accommodation of landowners will be the developer's responsibility.

The location of proposed Borrow Pits along the public road network will require a detailed entrance arrangement and a decommissioning method statement.

Drainage along the local road network primarily relies on an open drainage network and therefore requires the road edge drain system to be maintained. There is a risk, with large amounts of HGV traffic, that these open drains may be compacted or throttled resulting in excessive rainwater remaining on the road surface. The Roads Authority will need to know how this is either prevented or maintained. Culverts at proposed junction widening will have to be designed to allow unimpeded flows.

The report states that the overall environmental issues associated with possible construction contamination of watercourses will be dealt with by LCC Environmental department.

The report outlines a number of comments on the submitted EIAR which include the suitability of Park Road and its junction with the regional road being used for construction purposes, the specific actions required for public realm alterations, confirmation of whether access along the R-282 and L-6180-0 is required, the width of the L-6180-1 is not 4.0 metres in cross section as stated, clarification in relation to the temporary works required for AIL and clarification of how the developer has addressed the Stage 1 Road Safety Audit concerns. The Planning Authority is disregarding any comments in relation the grid connection which requires a separate consent for the purposes of this report.

Finally, the report outlines the requirements of the Roads Authority with respect to damage caused by the proposed development on the local roads network. The Roads Authority will be seeking a detailed plan of action for the following:

- Upkeep of public road network during the development.
- Maintaining the public road network to allow safe and unimpeded access to private dwellings.
- Reinstatement of public network to its original condition once the development is completed.

8.4 Assessment

It is the construction of the proposed wind farm, to include turbine delivery, which will result in the greatest impact on the local road network. These impacts primarily relate to the temporary increase in traffic volumes and the specific geometric requirements necessary to accommodate abnormal indivisible loads (AIL) associated with turbine components. The actual operation of the proposed wind farm gives rises to negligible traffic movements and will not be considered any further in this report.

During the peak construction period, approximately 139 no. staff are expected to be on site, reducing to approximately 50 personnel during off-peak activities. The EIAR adopts a precautionary approach of a worst-case scenario, an occupancy of 1 person per vehicle, as such a total of 278 trips (two-way) can be expected during peak construction and 100 trips (two-way) daily during off-peak.

A total of 43 standard heavy vehicles (HV) one-way (86 no. trips total) have been estimated at peak construction time (excluding the concrete pour volumes) and an average of 22 HV during off-peak (44 trips total). The peak movements are anticipated to occur from September to November 2028 when the site compounds, site roads, turbine hardstands, and turbine foundations are occurring simultaneously. The report from the Environment Department correctly identifies inconsistencies in the number of such movements in the narrative of chapter 16 of the submitted EIAR and Table 16.7 and Table 16.10 where this number has been reduced to 29 HGV one-way movements / 58 two-way trips. This is a material discrepancy because the subsequent traffic impact assessment appears to be based on the lower figure of 29 rather than 43.

The second greatest impact arises from the concrete pours for the turbine foundations, as each foundation requires a continuous single pour completed within one day. The construction methodology for the concrete turbine foundations occurs over 14 days, with each foundation poured in a single day, resulting in 230 HVs arriving on site per day. Considering the working hours, it is expected that an average of 19 HVs will arrive on site per hour. The total number of daily trips associated in and out of the site for each turbine foundation is $230 \times 2 = 460$ no. movements. It has been assumed in Chapter 16 that when this activity occurs, all other activities requiring deliveries are restricted, with the exception of essential deliveries. It is not clear how this daily impact has been assessed against local road capacity, resident disruption, school-time restrictions, and the proposed HGV peak-hour restrictions. The Commission shall satisfy itself in this regard as the Planning Authority is not satisfied that this impact has been adequately considered in Chapter 16 and its accompanying appendices.

Leitrim County Council and the TII both raise the need to assess bridges and culverts along construction and delivery routes, including confirmation of structural carrying capacity. While this requirement is acknowledged in the consultation summary, a clear section in the chapter providing the results of such structural assessments could not be identified. The assessment is therefore deficient in this regard.

Excavation of stone material from the borrow pits within the proposed project site to provide construction material will reduce the HV volumes. The internal access tracks have been designed to utilise existing forestry access tracks where feasible, reducing the volume of materials required for importation to the site.

For Heavy Goods Vehicles (HGVs), it is assumed that approximately 70% of trips will access the site via the primary site access on the L61801 (Site Access No. 1), with the remaining 30% accessing the site via access points on the L6184 or L61844. For Light Vehicles (LVs), it is assumed that approximately 90% of trips will access the site via the primary site access on the L61801 (Site Access No. 1), with the remaining 10% accessing via the L6184 or L61844. In terms of trip origins, it is anticipated that the majority of staff movements will approach the site via the N16, originating from the west, north, and south through Manorhamilton town centre, with a smaller proportion arriving from the east. Accordingly, the assessment assumes that 80% of staff trips originate from the west, north, and south via Manorhamilton town centre, with the remaining 20% originating from the east. It is only the increase in projected traffic volumes at the junction of Park Road with the Skreeny Road (12.1% during peak construction phase) which required a more detailed junction analysis. This further analysis demonstrated that the Ratio to Flow Capacity of 0.21 remains well below the critical rate of 0.85.

The submitted *Traffic Management Plan* outlines a series of mitigation measures to minimise likely significant effects of construction traffic. These measures are noted.

A Stage 1 Road Safety Audit (April 2026) was undertaken of the proposed project site accesses, and sections of the AIL haul routes where temporary accommodations are required. The recommendations of the Road Safety Audit have been incorporated into the scheme design.

The Road Safety Audit states (Section 4.1.2) that “No swept path analysis of the turbine delivery vehicle has been provided”. This would cause an obvious concern to the Planning Authority.

In the submitted Swept Path Analysis (Appendix 2.1), it states in section 1.2:

Overhead utility cables have been identified as they cross or run alongside the road however their height was not measured as part of the SPA, therefore prior to delivery of the blade the utility cables should be measured, and the utility companies should be contacted regarding heights of the cables and potential remedies. Utility poles have also been identified and where required recommended to be removed. Prior to removal consultation with the relevant utility companies is required.

The Planning Authority has considered only the proposed pinch points which are contained in Co. Leitrim, namely Locations 01-12 and 25-34.

The turbine blades have been indicated as being the largest single component to be delivered to the site. The swept path analysis indicates locations where temporary accommodations are required to accommodate the component deliveries. This shows a vehicle length of 92.85 metres (blade length 81.5 metres) and a width of 4.4 metres. Table 16.16 shows a series of accommodation works to accommodate the AIL along the route including temporary hardstanding areas, temporary removal or relocation of existing signage, and pruning of vegetation. The hardstanding areas will be laid in advance of the delivery of the Abnormal Indivisible Loads. The road edge strengthening works at each pinch point is stated to vary between 1 – 4 days. The hedgerow and minor vegetation cutting, required as a result of the AIL over sail, will be carried out using a single tractor with minimal traffic management requirement.

Location 34 is on the western approach to Manorhamilton within the 50 km / hr speed limit of the N16 National Primary Road. No clearance is required for oversailing by load and no ground works are proposed to enable the vehicular axles to pass. Location 4 is the next in logical sequence on the other side of the town through the signalised junction with Main Street / Sráid Sheáin Mhic Dhiarmada. The same conclusion is presented as in Location 34 above. The Swept Path Analysis does not seem to take into account cars which may be parked along the side of Gurns pub or on the other side of the New Line from the bus stop as far as The Bee Park Community Centre. There is marking for parallel car parking on both sides of the New Line at the Methodist Church. This seems a considerable oversight. To accommodate the convoy of AIL through the town on 23-38 no. days for delivery of these oversized loads would require no car parking to be permitted along the New Line. This would be a considerable undertaking for the Local Authority / An Garda Síochána to achieve.

Location 5 at the curve at the junction to Cemetery Road / in front of St. Clare's Church is the first location in the town where the load oversails to such an extent as requiring both clearance of obstructions along with levelling and strengthening. The drawing shows oversailing through the wall and shed of the Bee Park grounds to the west of the junction with Cemetery Road along with the boundary wall in front of the presbytery and St. Clare's Church. There are a number of mature deciduous trees within the grounds of the parish owned lands. It could be argued that the presbytery is within the attendant grounds and curtilage of St. Clare's Church which is a Protected Structure, RPS No. 57 (NIAH No. 30805029). The presbytery itself is also included in the NIAH, no. 30805028. The NIAH appraisal of the presbytery notes that is part of a group of ecclesiastical structures including St. Clare's Church to the south-east. The presbytery is set back from road within mature gardens, bounded by rendered and random stone walls with cast-iron gate piers and gates. Path links house to Roman Catholic church. There is no detail submitted of what extent of pruning of lower hanging branches would need to be removed or of the extent of hedgerow opposite noting that it does not currently protrude onto the public road. The legal entitlement of the applicants to undertake these works is seriously questioned and it is the view of the Planning Authority that these works of themselves, namely the altering of existing roadside boundary

walls, require planning permission. Their impact has not been assessed in the submitted application documentation to include Chapter 14.

At Location 06, the works required are within the public road adjoining the existing roundabout.

At Location 12, the junction of the N16 with the L-6184, works are proposed to roadside fence boundary along with road signage and bollards. The consent of the landowner would be required in this regard. It is not apparent if such consent has been obtained.

At Location 01 which is just east of Location 12, the drawing shows oversailing (orange) requiring clearance of obstructions to facilitate turbine delivery. This would appear to impact on the existing agricultural roadside boundary (hedgerow, embankment and agricultural gateway) along with the front wall of a dwelling, which is currently for sale (Sale agreed). The legal entitlement of the developer to undertake these works is also questioned. This is shown in Figure 12 below.



Figure 11: Existing boundary treatment in front of Parochial House and St. Clare's Church



Figure 12: Extract from Location 01, Appendix 2.1 Turbine Delivery Route



Figure 13: Leminea Bridge



Figure 14: Extract from Location 02, Appendix 2.1 Turbine Delivery Route

No impact is shown on Leminea Bridge noting that the road has a width of approximately 5.4 metres at this location. Similar clearance works are required beyond the bridge in relation to an existing field roadside boundary (hedgerow). The structural integrity of the bridge to withstand the extent of weight in the AIL and of the volume of construction materials envisaged has not been considered. The consent of the homeowner to alter the existing roadside boundary treatment to the west would also be required. This is shown in Figure 14.

The proposed access road from Cherrybrook to connect with existing forest access tracks is stated in the EIAR to be 860 metres in length. It traverses across a local road which the EIAR states is not named. It is a named roadway as outlined earlier in this report. The Site Layout Plan (Sheet 9 of 9) has 2 no. annotations shown with respect to this access road, 'Proposed Temporary Site Access 1 (Refer to Drg. No: 10955-2078 for details, Turbine delivery only)' and 'Proposed Site Access Road (Refer to Drg. No: 10955-2033 for details)'. The drawing also shows that the entirety of this track is shown in dark grey which from the legend corresponds with '*Proposed Permanent Access Road*' although considered an oversight. The former drawing referenced in the annotations is a generic drawing titled 'Proposed Track Construction Details'. It refers to 3 types of Access Track – Excavate & Replace; Standard Access Road Construction; and Widening of Existing Track (outside of peat areas). It is assumed that the subject roadway is Type 2 although an EIAR should not rely on a consenting authority having to make assumptions. The latter drawing is not a standard road design drawing and shows minimal detail on an aerial overview. There is no legend shown on this drawing. No details of the road construction, width, finished ground levels, treatment with existing public roads, etc. are provided. No contours are provided to allow the Planning Authority to present an informed view to the Commission. The access roadway does appear from examination of mapping that it traverses across a drain with no details of proposed culverting. This is shown in the green oval overleaf in Figure 15.

The details submitted in this regard are sub standard and do not allow an informed opinion of the impact of such a roadway on the landscape to be formed notwithstanding it's temporary impact or the traffic safety impacts for both local roads affected by this proposal. The details have not demonstrated the achievement of the requisite sight distances for vehicles exiting onto the L6184 local roadway. If this is only used for turbine delivery, it will be presumed that there will be temporary traffic management measures in place for access and

egress which would be closed off for all other purposes. The only drawing that shows any contours for this access roadway is within the Swept Path Analysis (Location 03 - L6184 Site Entrance). This does not conform to the guidance provided for Wind Energy developments in that *“Access roads/tracks should relate to key characteristics of landscape, e.g., the roads should not follow a straight line up a Mountain Moorland slope directly to the wind energy development, but rather a diagonal line following the contours.”*

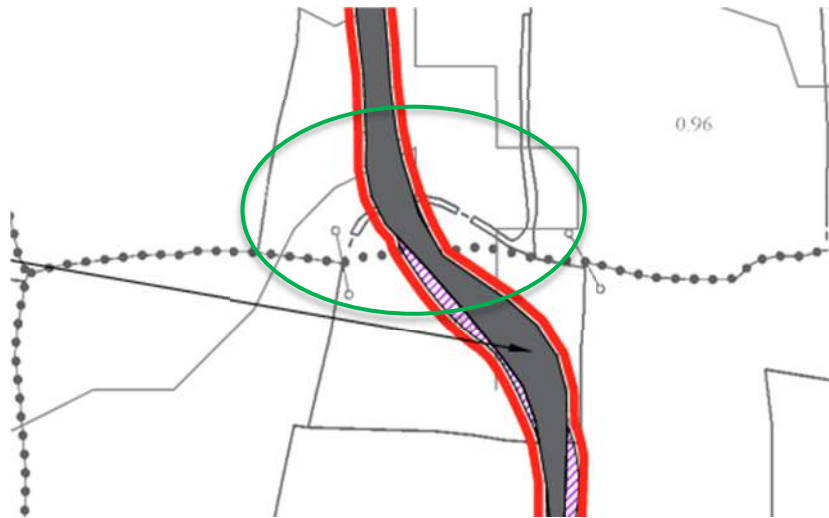


Figure 15: Extract from Site Layout Plan Sheet 9 of 9



Figure 16: Approximate position of proposed new temporary roadway at Cherrybrook with Faughary Windfarm visible in the background

The passing bays will require the consent of the adjoining landowners. It is unclear if such consent has been obtained.

It is unclear if the traffic associated with the felling of the considerable extent of forestry has been included in the submitted Traffic and Transportation section of the EIAR and accompanying appendices.

The Planning Authority would concur with the Senior Engineer that the issues identified in the Road Safety Audit have not been rectified in the submitted drawings. The Road Swept Analysis should have formed part of this assessment but the Analysis was completed in April 2026 whereas the Road Safety Audit was completed in January 2026. It is therefore an incomplete assessment.

Permanent Site Access Location 2 - Temporary Over-run Area. This access is also to serve Proposed Borrow Pit 2 off the L1684. The access details are shown to the west of the local road only and no details of the proposed upgrade works if any, have been shown. The Planning Authority does accept that the access to serve the Borrow Pit already exists and serves the forestry. The submitted drawing should show details of proposals to provide for requisite sight distances. There are issues in relation the vertical alignment of the roadway at this location (see Figure 17). No long section of the access has been submitted. The issue identified in the Road Safety Audit for this junction remains unaltered (see Section 4.15 Site Access – Temporary Over-run Area).

Site Access 4 does not include a proposed culvert of the existing roadside open drain. (see Section 4.22 Site Access 4 - Drainage).

Site Access 5 & 6 – the details shown do not take the vertical alignment of the roadway into account. (see Section 4.2.3 Site Access 5 & 6 – Junction Visibility). The minor realignment of the junction does little to alleviate this stated concern. It addresses concern 4.2.4 but not the previous comment 4.2.3 in the Road Safety Audit.



Figure 17: Road alignment from access to Borrow Pit 2 in a southern direction

In the Background Section of Chapter 1 of the EIAR Introduction, it stated that the “*Proposed Project*” includes any works being carried out within the public road corridor (i.e. localised road widening or works to facilitate delivery of components to the site), which are not subject to planning consent but are assessed as part of the proposed project. The Planning Authority would disagree with this statement based on my consideration of the submitted Swept Analysis report but also of boundary treatments along the roadways being in private

ownership and outside of the application site boundaries. The Planning Authority is also aware for instance of current planning applications having been lodged by Bord na Móna Powergen Ltd. with Mayo, Sligo and Donegal County Councils for such accommodation works to facilitate turbine component delivery to the consented Owninny Wind Farm Phase 3 in Co. Mayo. The submitted planning application does not therefore address the full extent of works required to allow the wind farm to be constructed. The submitted application is therefore incomplete.

8.5 Conclusions

On the basis of the foregoing, the Planning Authority is not satisfied that the application documentation, although voluminous in nature, has included the full extent of works required to accommodate the Turbine Delivery Route through the town of Manorhamilton in particular, to include its potential impact on important heritage elements associated with St. Clares Catholic Church and Presbytery but also from the junction of the N16 at Cherrybrook to the proposed temporary road crossing. It is the view of the Planning Authority that these works require planning permission and sufficient legal interest to make such a planning application. This is not evident in the application documentation submitted. It is unclear if all of the recommendations from the Road Safety Audit have been included in the submitted application drawings. The Planning Authority is not satisfied that the analysis of all of the site entrances have taken into account the vertical and horizontal alignment of the local roads in their vicinity and as such, constitute traffic hazards. The Turbine Swept Analysis was not available to the engineers who prepared the Road Safety Audit and is a significant omission. The Roads Authority are not satisfied that the local road network, the L-6180 in particular and Leminea Bridge, can accommodate the volume of construction related traffic associated with the proposed wind farm development. The impact of the proposed Borrow Pit related traffic or of forestry clearance related traffic on the local road network have not been assessed in the submitted application.

9. Impact on Residential Amenity

9.1 Shadow Flicker

Shadow flicker is addressed in Chapter 10 of the submitted EIAR. Only residential dwellings and potential for future residential dwellings (residential planning applications) have been identified have been identified as sensitive receptors within the study area. This excludes the impact of shadow flicker on users of the road network in the vicinity of the site.

Shadow flicker effects were considered within a study area of 1.63 km of the proposed turbine locations which equates to 10 times the maximum rotor diameter. This is in accordance with the WEDG 2006, which states that the potential for shadow flicker at distances greater than that is very low. The 2006 WEDGs recommended maximum thresholds of 30 hours per year or 30 minutes per day which have been applied to all sensitive receptor locations within 1.63 km of a proposed turbine location in order to identify any shadow effect requiring mitigation.

In terms of modelling, the Planning Authority notes that the modelling software used to calculate shadow flicker includes a number of conservative assumptions, including a '*bare earth scenario*', constant wind speed and direction, and realistic sunshine hours.

Based on the worst-case conditions (and without any mitigation), it is predicted that 59 no. of the 84 no. receptors included in the modelling assessment will experience some level of shadow flicker, with 29 no. of these in excess of the 2006 WEDGs threshold of 30 minutes per day at certain times of the year. A total of 25 no. receptors will not experience any shadow flicker. The technical assessment shows that the guideline threshold limit of 30 hrs per year is predicted to be exceeded at 28 no. receptors in the worst-case scenario and is expected

to be exceeded at no receptors when the statistical sunshine probability is taken into account. Therefore, significant shadow flicker effects will occur at sensitive receptors where the 2006 WEDGs recommended limits of 30 mins per day or 30 hours per year are exceeded before mitigation measures are applied.

The Planning Authority acknowledges the applicant's commitment to having zero shadow flicker at any occupied dwelling house within 1.63 km of the proposed turbine locations. Where shadow flicker is likely to exceed the threshold limit values, there are a range of control/mitigation measures that will be implemented. A shadow flicker control system will be installed on each of the wind turbines that have the potential to cause shadow flicker for sensitive receptors, namely the turbines to the west (T2, T3, T9, T11) and south (T13, T14).

In order to mitigate the potential shadow flicker impact, it is proposed to implement control modules in the turbines with software to prevent turbine operation during the specific periods when shadow flicker exceeds the thresholds. The use of such control mechanisms to address potential shadow flicker is a relatively standard feature in modern wind turbines and, given that shadow flicker effects, by their nature, lend themselves to accurate prediction, there is no reason to believe that the shut-down protocols would be ineffective in mitigating the potential impacts in the limited cases where they arise. The turning off of particular turbines at certain times is explicitly referenced in the WEDG 2006 as an example of a measure to prevent or ameliorate the potential effect of shadow flicker on nearby sensitive receptors.

Subject to implementation of these mitigation measures, the Planning Authority does not consider that the proposed development would result in significant shadow flicker impacts at residential receptors within a distance of 10 rotor diameters of the proposed wind turbines. A suitable condition can be imposed in relation to shadow flicker thresholds, control measures and the submission of a report to the Planning Authority to establish compliance with these requirements. The Planning Authority notes the comment of the Environment Department that where a shadow flicker problem persists at an affected property and following the monitoring of agreed screening measures, the effectiveness of the measures are not functioning to the satisfaction of the property owner/occupant, the turbines creating the issue should be included in the Turbine Shutdown Scheme.

9.2 Noise

Noise is addressed in Chapter 9 of the submitted EIAR along with Vibration.

The WEDG 2006 guidelines outline the following guidance to identify appropriate wind turbine noise criteria curves at NSLs:

- An appropriate absolute limit level in the range of 35 – 40 dB LA90 for quiet daytime environments with background noise levels of less than 30 dB LA90,10min;
- 45 dB LA90,10min or a maximum increase of 5 dB above background noise (whichever is higher), for daytime environments with background noise levels of not less than 30 dB LA90,10min and;
- 43 dB LA90,10min for nighttime periods.

While the caveat of an increase of 5dB(A) above background for night-time operation is not explicit within the 2006 WEDGs, an allowance for same is commonly applied in noise assessments prepared and considered best-practice. The '*study area*' for background noise surveys (and noise assessment) should, as a minimum, be the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10 m/s wind speed.

Section 9.4.1.2 (Operational Phase Noise) states that the operational phase study area should cover, at a minimum, the area predicted to exceed 35 dB LA90 from all existing, permitted, and proposed wind turbines. In

this instance the noise study area is defined as the cumulative 35 dB LA90 noise contour due to the proposed wind turbines along with the operational Faughary wind turbines to the west.

Baseline noise surveys were undertaken at 11 no. representative locations around the wind farm site, with the monitoring locations selected to represent nearby receptors and informed by preliminary noise modelling, site inspection and mapping review.

In relation to construction, the assessment concluded that the majority of works would remain below the relevant construction noise thresholds. Some short duration works, particularly close-range internal track construction and grid connection works, may temporarily exceed the linear works threshold at very close receptors; however, due to the progressive and short-term nature of these activities, the effects are assessed as not significant. The chapter concludes that, given the separation distances between the proposed works and nearby receptors, vibration levels are expected to remain well below thresholds associated with building damage or perceptible significant effects.

Overall, the submitted noise assessment demonstrates that the proposed development, regardless of hub height, complies with the daytime and night-time noise limit criteria at noise sensitive receptors as per the WEDG 2006. In the cumulative impact scenario, operational noise levels of the proposed and adjacent wind farm at Faughary will meet the daytime and night-time noise limit derived using WEDG 2006 for 149 no. of the 159 no. Noise Sensitive Locations (NSLs) within 2km of a proposed turbine for a range of operational speeds. This is based on the worst-case operating turbine noise levels.

Operational turbine noise modelling was undertaken using a worst-case assessment turbine based on the highest sound power levels across the candidate turbine types within the proposed design flexibility range. The cumulative assessment included the existing operational Faughary Wind Farm, as it has potential to contribute to cumulative turbine noise levels. The results show that predicted cumulative operational turbine noise levels are below the applicable noise criteria at all NSLs. Differences between the upper and lower ends of the turbine design flexibility range were found to be negligible.

The Environment Department outlined a need for clarification with regard to the location of each of the noise sensitive locations used for measurement purposes. The elevation of each location, the distance in metres from the wind turbine site boundary and the distance to the nearest turbine(s) should be clearly provided. Noise Monitoring Locations NML-10, NML-2, NML-4 and NML-5 (Figure 9.2) were not the nearest that would be considered the nearest sensitive receptors to some of the turbines. It appears there is a dwelling west of Turbines T11 and T12 which the noise monitoring assessment did not take into consideration. The Commission shall satisfy itself that the submitted Noise Impact Assessment adequately assesses the likely impact on residential amenity of the nearest noise sensitive locations by reason of noise.

The noise limits shall be set at the WEDG 2006 guidelines limit which corresponds to the suggested condition contained in the Environment Department report in Appendix II. The other suggested conditions in relation to noise shall be included as outlined at the end of this report.

10. Visual Impact

10.1 Introduction

Chapter 2 of the EIAR (Description of the Proposed Project) identifies the ground levels of the proposed turbines as follows

- **Turbine T1, 2, 4, 5, 6:** located in the north of the site in coniferous forestry at elevations ranging from approximately 270 m AOD (T1) to 350 m AOD (T5).
- **Turbine T3:** on the southwestern slope of Saddle Hill at an elevation of 350-360 m AOD in upland blanket bog.
- **Turbines T7, T9:** located in the central section of the site in marginal land/wet grassland at elevations of approximately 350 m AOD and 245m AOD, respectively.
- **Turbines T8, T10, T11, T12:** located in the southwest of the site in coniferous forestry at elevations ranging from 175 m AOD (T12) to 320 m AOD (T8).
- **Turbine T13 and T14:** located in the southeast of the site in coniferous forestry that ranges in elevation from 200m AOD to 280m AOD.
- **Meteorological Mast:** a 100m-high mast will be installed east of the substation and west of T12.

Specific finished floor levels of the proposed turbines are not provided as they straddle across contours within the landscape.

The application site is stated to range in elevation from 170 to 380 m AOD, with the eastern part of the site bordering Dough Mountain (462m). The northern turbines are situated within the Saddle Hill (375m) Coillte property at elevations between 280 and 310 m AOD generally in undulating terrain. The southern turbines are located between 170 m and 380m AOD. The adjoining Thur Mountain rises to an elevation of 432 metres in height.

The applicants have outlined in their submitted Landscape and Visual Assessment the manner in which they have considered the findings of visual and landscape considerations in their siting and design of the submitted wind farm layout. This is outlined in Section 13.7.1 *Embedded Mitigation/Mitigation by Design*. While it was considered that a wind energy development could be accommodated within this modified transitional upland setting, the initial-stage wireframe photomontages identified the potential for more pronounced visual effects to occur at certain scenic designations and sensitivity landscape within the study area. Most notably, there was potential for significant visual effects along a designated scenic view located to the south of Manorhamilton and within the surrounds of O'Donnell's Rock to the south of the proposed project. The submitted layout does demonstrate a reduced visual presence of the development from surrounding receptors.

Principal mitigation measures that will be implemented to make the proposed project less intrusive and less prominent at a localised level consist of: -

- The colour will be industry standard off-white/light grey semi-matt non-reflective finish;
- Electricity lines between individual turbines and the substation, and the grid connection infrastructure, will be placed underground;
- Special care will be taken to preserve any features, in so far as possible, which contribute to the landscape character of the study area - such as the retention of existing hedgerows and vegetation, insofar as possible, to maintain existing levels of screening within the immediate study area.
- Counter rotation of blade sets will be avoided.

The 2019 Draft Wind Energy Development Guidelines (WEDG) outline that the first consideration in the siting of wind energy developments is a sieve mapping process which takes account of landscape character assessment in the identification within the Local Authority Development Plan of areas which are ‘*acceptable in principle*’ for wind energy development, where they would be ‘*open for consideration*’, and where they would be ‘*not normally permissible*’. On satisfying this prerequisite, the guidance then provides indicative and general advice in considering the most appropriate location, design and layout for the development, taking into account the type of setting. The guidance does not suggest that wind energy developments are appropriate or inappropriate in any given situation. These questions can be informed and/or qualified by the values people attach to landscape and by evaluating their sensitivity.

10.2 County Development Plan Considerations

It is useful to again summarise the main findings from the consideration of the County Development Plan at an earlier stage of this report. As outlined in the section of this report dealing with Local Policy Context, the County Development Plan 2023-2029 does not identify any areas of Co. Leitrim whereby wind farms would be ‘*acceptable in principle*’. This was informed by *A Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* which was undertaken by RPS and provides a robust landscape and visual capacity study to specifically evaluate the respective capacities of various landscapes in the county to potentially accommodate larger scale wind energy development proposals. In general, the capacity study concluded that:

- there is very limited capacity to absorb future large scale proposed developments in the form of multiple wind turbines and wind farms;
- the areas of search comprise landscapes of considerable scenic quality for which, the introduction of wind turbines and wind farms would, in many cases, result in likely significant effects, and;
- although scope for future wind energy development would be limited, each planning application for proposed development of this kind would have to be judged individually on its own merits with reference to a landscape and visual impact assessment report (LVIA) undertaken in line with best practice guidance by an appropriately qualified landscape architect. The LVIA would also demonstrate that the design of the proposed development, in terms of number, hub height, tip height and siting of individual wind turbines has regard for the baseline landscape character and visual amenity of the study area in which the development would be located.

It is however acknowledged that areas of upland moorland where rolling landform and consistency of landcover could be deemed worthy of further assessment to ascertain capacity to accommodate a limited number of wind turbines. Such areas may also comprise altered landscapes due to manmade influences such as commercial forestry. These areas may include “*Some limited moorland areas in the vicinity of Dough Mountain and Saddle Hill within LCA 4 Arroo and Mountain Outliers*”.

It is clear that the majority of the application site coincides primarily with areas of coniferous forestry and was largely within the area of search associated with LCA 4 Arroo and Mountain Outliers (see Figure 2 above). Proposed turbine no. 11 & 12 and their associated infrastructure along with the proposed 110 kv sub station and compound area adjoin this area of search to the south west. The associated infrastructure with proposed turbine no. 13 and 14 are also outside this area of search along with the proposed temporary site access 1. Both of these turbines are marginally within the area of search.

The suitability of the proposed development therefore hinges on whether the submitted Landscape and Visual Impact Assessment has demonstrated that the submitted design and siting of the proposed development would not adversely impact on the landscape character and visual amenity of the wider area in which the development would be located.

10.3 Assessment

From the submitted documentation, turbine T3 is proposed at the highest elevation of 350-360 metres. At their maximum scale, the turbines would have a hub height of 110.5 metres and a rotor diameter of 163 m giving a tip height of 185 metres. The hub of T3 and T7 will be above the summit of Dough Mountain along with T1 on Saddle Hill. From lower ground looking upwards, e.g. along the N16 or from within Manorhamilton, these and other turbines will break the skyline. The 3 no. existing turbines at Faughary Wind Farm on Saddle Hill are sited in open moorland as there is no coniferous forestry at this location. In comparison, the majority of the proposed turbines in Lissinagroagh Wind Farm are located within existing coniferous forestry with the exception of T3, T7 and T9. T11 is located quite close to the local road and will be quite prominent along the roadway. The adjoining coniferous forestry is approximately 15 years planted on the basis of Google Streetview imagery. The existing turbines at Saddle Hill are very visible at this location albeit in the background. T9 is not located within existing forestry and is located in a downslope from the local roadway. T7 is located on the opposite side of the local roadway on an upslope of Dough Mountain. The landscape is quite open and vast at this general location with the main exceptions being the regimental planting blocks of conifers and the existing turbines in the landscape. T9 will have a more significant impact as a result when viewed from the L-61842-2 which does provide very scenic views over the wider landscape. T3 is located on Saddle Hill at a higher elevation than the existing turbines. It is sited at a height of 340-350 metres which will tower above the summit of Saddle Hill (375 metres). The majority of the turbines do attempt to sweep around the lower to mid slope of Dough Mountain such that their visual impact for example from the R283 will be minimal to slight.



Figure 18: Faughary Wind Farm visible from Ben View housing development

In terms of location, the Planning Authority would consider that the siting comprises some turbines located lower down on the sweeping Dough mountain, some turbines located in a saddle between Dough Mountain and Saddle Hill and some turbines located on the peak of Saddle Hill. The layout appears random with irregular

spacing. The Planning Authority would consider that the scale of the landscape can accommodate this siting and design option due to the scale of the plateau of Dough Mountain but would express concern in relation to Saddle Hill which is much smaller in scale. No attempt has been made to provide a rhythmic grid layout where it relates to the geometric block of conifers nor to confine the development within such planting.

It is accepted that whilst the proposed project represents a long-term project, it is likely to be a reversible built feature within the landscape. Within a period of two to three years following decommissioning, the visible evidence of the wind farm is expected to be minimal, with the exception of the on-site substation, underground grid connection, and any retained access tracks that continue to serve practical or management functions as part of the enduring upland working landscape. Nonetheless, the impact on both the landscape and visual amenity is long term from an EIA perspective.

The Planning Authority accepts that there will be some temporary landscape impacts during the construction phase including along the Turbine Delivery Route and Grid Connection Route, but agrees with the submitted assessment that such impacts are modest, temporary in nature, not significant and overall, of moderate significance. This assessment therefore focuses on the proposed wind turbine structures themselves which will be a permanent feature in the landscape for at least 35 years. The greatest potential for landscape impacts occurs as a result of the change in character of the immediate area with the introduction of 14 no. tall structures with moving components.

There is no view or prospect identified within the County Development Plan towards Dough Mountain, Saddle Hill or Thur Mountain. All of the views and prospects identified in Figure 3 are in a direction away from the proposed wind farm development. There are no protected views or prospects in the immediate vicinity of the site or towards the proposed wind farm development. The Planning Authority does not believe therefore that the proposed wind farm development will adversely affect any designated view or prospect in the County Development Plan. As outlined in the submitted Landscape and Visual Assessment, no view or prospect is centred on or features Saddle Hill, Dough Mountain or Thur Mountain. Whilst some of the turbines may be visible from the location of a protected view or prospect identified in the County Development Plan, the direction of the protected view or prospect is in a different direction. The proposed wind farm development will not therefore adversely impact upon any view or prospect and is therefore compliant with LD POL 1. No further consideration of such an impact is required.

The Planning Authority has examined the character of the landscape and outlined areas of particular landscape quality, distinguishing between Areas of Outstanding Natural Beauty (AONB) and Areas of High Visual Amenity (AHVA). The majority of the subject site is located in an AHVA, B3 Dough Mountain. The entrance and the initial part of the access road from the L61801 (Permanent Site Access 1) along with turbines T01-T03 and their associated access roads are outside but immediately contiguous to the AHVA. The local road, L61802, is the boundary, with all of this infrastructure proposed north of the roadway. The temporary site access (1) and temporary road crossings 1 & 2 along with the temporary access road at Cashelaveela and onwards to Boleyboy are similarly outside but immediately contiguous to this AHVA. The adjoining Thur Mountain is also an Area of High Visual Amenity, ref. B4.

The County Development Plan has determined that whilst the landscape in an AHVA is of a high visual amenity owing to a range of factors including natural, cultural and man-made influences, it is not as sensitive as that of Areas of Outstanding Natural Beauty although still recognised as a landscape of notable scenic and visual value. The County Development Plan identifies that the moorland plateau associated with the summit of Dough Mountain (above the 450m contour) is a remote and visually open area due to the scarcity of woodland vegetation whilst the summit presents an important scenic skyline as backdrop to the surrounding valleys. The visual openness of this landscape facilitates long range dramatic views towards adjacent mountain ranges. The

County Development Plan notes that landscape below the 450m contour features extensive plantation coniferous forestry which is a detracting element. The presence of an extensive network of small roads within the commercial plantation forestry and also wind turbines are detracting elements which undermine the scenic quality. The Planning Authority does therefore accept that due to the extent of coniferous afforestation within the lower and mid slopes of Dough Mountain and the presence of the existing wind farm at Faughary, that the sensitivity of the landscape of the site and of the central study area (5km from the nearest turbine) is medium. The Planning Authority also accepts for the reasons outlined in the submitted Landscape and Visual Assessment that the wider study area is more diverse than the central study area, incorporating a broader range of landforms and landscape types, containing areas of high sensitivity that would be particularly susceptible to change, while other parts exhibit a similar degree of robustness to the central study area. As a result, the overall sensitivity of the receiving landscape within the wider study area is assessed as Medium to High, with the western extent demonstrating High and, in some cases, Very High sensitivity.



Figure 19: View of Faughary wind farm from within the Star Fort, recorded monument, Manorhamilton

In section 13.8.2.2 *Operational Stage Effects on Landscape Character*, the assessment states

“While the proposed project will result in a further intensification of wind energy development within the central study area, it does so within a landscape that has demonstrated capacity to accommodate such infrastructure – reflected in the available areas designation in the current CDP”.

This is a misrepresentation of what ‘Available Areas’ are in the County Development Plan. The *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* was a subsequent step following the identification of *Available Areas* and concluded that there is very limited capacity to absorb future proposed development in the form of wind turbines and wind farms. The Planning Authority would not accept the statement that the “proposed turbines are therefore consistent in both scale and function with existing development patterns”; they are not. The *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* made reference to

moorlands in the vicinity of Dough Mountain and Saddle Hill having the potential to accommodate a limited number of turbines. The Planning Authority would consider that an ordinary interpretation of the term '*in the vicinity*' means in the surrounding area or nearby. It did not specifically state for example on Saddle Hill or on Dough Mountain. The Planning Authority would also strongly question if a wind farm of 14 no. turbines would be considered a '*limited number*'. It is not considered that a development of the scale proposed was envisaged at this location as if it had been, it would not have been qualified in the manner stated.

The Planning Authority would consider that too great an emphasis is placed on the prevailing pattern of large-scale managed forestry on Dough Mountain and existing renewable energy infrastructure adjoining in Saddle Hill. The Planning Authority does not accept that coniferous forestry which reads from a distance as ground cover albeit breaking the skyline on occasion and of a different colour to the existing moorland necessarily assists in assimilating the proposed wind farm within the receiving environment. This is a commercial crop which will be harvested leaving a devastated landscape in its wake and exposing the full extent of the turbines within the landscape. By virtue of their scale, the Planning Authority considers that the proposed wind farm development, as presented, will give rise to significant conflicts of scale, form and land use compatibility.

The submitted LVIA concludes that the significance of the operational effect is considered to be Substantial-moderate / Negative / Long term within and immediately around the proposed wind farm site. The Planning Authority fails to then understand how the assessment can conclude that the effects overall when one considers all aspects of the development, to include construction, operation and decommissioning are deemed **Not Significant**. It is the operational impact which has the most profound and long term impact on the landscape of the area.

No turbine is proposed above the 450 metre contour in which the open moorland is referred to in the landscape designation assessment although parts of the turbines will be visible at this height to include parts of their towers, nacelle, hubs and rotating blades. The Planning Authority is satisfied that we have considered the landscape sensitivity as an important consideration in determining the appropriateness of the development of a wind farm but do not consider the receiving landscape as being necessarily unique, LCA POL 3 refers. The application has been accompanied by a landscape and visual assessment prepared by suitably qualified professionals to include photomontages of the impact of the wind farm in the receiving landscape, LCA POL 5 refers. The assessment of the proposal must have regard to the value of the landscape, its character, importance, sensitivity and capacity to absorb change as outlined in Appendix VII of the County Development Plan - Leitrim Landscape Character Assessment (2020) and its recommendations, LCA OBJ 2 refers. The Planning Authority are equally required to seek to ensure that the quality, character and distinctiveness of the physical, visual and scenic character of the landscape is protected and enhanced, LCA OBJ 1 refers and that such areas of scenic and visual amenity are protected from inappropriate development, LD POL 2 refers. Finally, LD POL 3 seeks to only permit development in an area of High Visual Amenity only where the applicant has demonstrated a very high standard of site selection site layout and design and where the Planning Authority is satisfied that the development could not be accommodated in a less sensitive location.

The Planning Authority fail to understand the rationale for the inclusion of proposed turbines T13 & T14. They present as outliers in most views of the proposed development as presented in the submitted photomontages. The Planning Authority would question if their inclusion is due to their location proximate to borrow pit 3? Indeed, they present at a number of occasions in the submitted LVIA as requiring specific comment – referred to as the eastern most turbines rather than by their numbers. The manner in which this has been described as introducing a slight sense of visual tension is subjective.

One such example is the following (Pg 61 - 13.9.2.2.2 Effects at Designated Views):

While there would be some minor negative aesthetic effects associated with limited instances of turbine stacking, the proposed array will generally appear in a legible manner, with the two easternmost turbines reading as slight outliers. The existing Faughary turbines will likely be perceived as part of the same development, and although the proposed turbines are of a larger scale, the perceived difference in size is relatively limited, resulting in little sense of visual or scale conflict.

The proposed turbines are 1.5 times the height of the existing turbines at Faughary Wind Farm. From certain longer distance viewpoints, the Planning Authority would accept that most of them (with the exception of T13 and T14), they will read as being part of the one overall wind farm but from other closer views (within 5 km), they will not. The Planning Authority would similarly question the rationale for the siting of T03 at such a height in comparison to the existing turbines at Faughary and their landscape and visual impact on the adjoining Saddle Hill.

The nearest dwelling is 763 metres from a proposed turbine. The distance exceeding the required WEDG guidelines is used as justification for proximity and the visual impact from such residential receptors is downplayed in my opinion. The submitted Landscape and Visual Assessment places recurring emphasis on the landscape already being influenced by wind energy development. The existing Faughary wind farm consists of 3 x 2 MW turbines (6 MW output) operated by Gaelectric. The existing Enercon E82 turbines have an overall tip height of 119.3 metres, hub height 78.3 metres with a rotor diameter of 82 metres. The visual and landscape impact of the existing 3 turbines in comparison to an additional 14 no. turbines which are much taller than those which exist will likely cause visual confusion. It is inevitable that a 14 no. turbine wind farm of considerably greater scale (14 no. 185 metres to tip height vs 3 no. 119 metres to tip height) will have a more pronounced landscape and visual effect.

Effectively from a potential landscape and visual impact, the proposed development represents a significant intensification of wind energy development within the wider local landscape. There is no wind energy development of a comparable scale, existing or proposed, within this area of north Leitrim. With the exception of the existing 3 no. turbines at Faughary, there is limited intervention in upper slopes of Dough Mountain and Saddle Hill. The impact of coniferous forestry is considerable and an expansive existing man-made intervention on Dough Mountain on effectively all sides albeit not on a blanket basis but on regular shaped sites extending 400 metres in places. Such planting is less plentiful on Saddle Hill with the exception of the eastern area adjoining Dough mountain and almost absent in comparison on the neighbouring Thur Mountain. However, the Planning Authority does not believe that the presence of the existing turbines at Faughary impact on the setting and character of Dough Mountain and when viewed from Thur Mountain. The designation of Dough Mountain as an Area of High Visual Amenity stands due to its key characteristics, in particular, the mountain summit and surrounding elevated areas with the outlook towards adjacent hills and valley landscapes. The County Development Plan therefore provides that it is the recognition of the skyline of the mountain summit which is deserving of protection. On balance, the Planning Authority do not consider that the majority of the proposed development would therefore adversely impact on the preservation of the summit of Dough Mountain or of its relationship with Thur Mountain which is similarly an Area of High Visual Amenity.

In terms of the significance of the potential landscape impacts, the proposed development would have an impact on the landscape but noting the nature and characteristics of the receiving landscape as outlined above, the Planning Authority concurs with the conclusion of the EIAR that the proposed development would have a moderate landscape impact within the 5km central study area, reducing beyond this as it becomes a smaller element of what is a complex and varied landscape. The Planning Authority therefore considers that the proposal would not have an unacceptable impact on the wider receiving landscape.

The Planning Authority would point out that the submitted maps which indicate the actual location from which the Photo Montages are taken are of limited use to an ordinary resident not familiar with being able to locate a site using national grid references. The LVIA viewpoint locations selected are similarly of limited use from a navigation perspective. The manner in which this has been presented by MacroWorks could have been greatly improved.

It is beyond question that the height and scale of the proposed wind turbines are such that they undoubtedly have the potential to impact on the visual amenities and character of the area much more than 3 no. turbines which are 66% of their height and less than 25% of their scale. Furthermore, due to their scale, these impacts cannot be effectively mitigated (such as by screening vegetation). The careful siting, design and layout of the turbines is therefore the only effective means of reducing the significance of impact. The Planning Authority has to accept that the separation distance from the nearest residential receptor at 763 metres is more than 4 times the proposed maximum tip height. The draft revised Wind Energy Development Guidelines (2019) state that *“a setback distance for visual amenity purposes of 4 times the tip height should apply between a wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development, subject to a mandatory minimum setback of 500 metres.”* It is a specific planning policy requirement of said draft revised Guidelines under Section 28(1C) of the Planning and Development Act 2000, as amended, that, in both their development planning and management functions, Planning Authorities shall not apply a setback distance that exceeds these requirements.

With regard to the proximity of the proposed windfarm site to Manorhamilton, which is 3 km distant, there are a number of locations from within the town from which a large number of turbines will be visible and more prominently than that shown for VP 18 (Manorhamilton Castle) and VP 19 (Cloneen Park) such as from the Star Fort, from Ben View Park, the roadway adjoining the Famine Graveyard and Our Lady's Hospital beyond Taobh Tire and from the Skreeny Road, the Planning Authority does not consider this to be a significant adverse visual impact. This impact is more pronounced due to the elevated nature of the application site and the juxtaposition of the town at a much lower elevation. In most other cases, views of the proposed windfarm from the nearby population centres (all at least 3km from the development site) will be screened either by existing buildings or vegetation. The exception to this is from the nearby village of Lurganboy from which an open panoramic view is enjoyed opposite the Church of Ireland, from the R280 south of the town and from the N16 to the east of the town. The Planning Authority does accept that these vantage points have been considered in the Photo Montages submitted. Closer to the site, in my opinion, the wind turbines will dominate and intrude on views of Dough Mountain / Saddle Hill from a southern and western approach.

Having regard to the extent of the established working character of this upland plateau, dominated by coniferous forestry in the lower to mid slopes and which hosts an existing small windfarm, and which is not considered unique or rare from a landscape perspective, the Planning Authority is satisfied that the proposed development would not result in a significant cumulative landscape impact. The Planning Authority would however consider that the siting of the proposed turbine no's 3, 13 and 14 to cause visual disruption to the scenic quality of this Area of High Visual Amenity allied to the differing size of turbines having the potential to cause visual confusion and conflict. Subject to these turbines being omitted, the Planning Authority would be satisfied that the proposed development would not cause an unacceptable, direct, adverse impact on the considerable visual amenities of the area and would be generally in accordance with LCA POL 3, LD POL 2, LD POL 3, LD POL 5 and LD OBJ 4.

Based on the foregoing, the Planning Authority would consider that the Commission should omit proposed turbines 03, 13 and 14 due to their adverse landscape and visual impact.

11. Land, Soils and Geology

11.1 Overview

The submitted assessment notes that the dominant soil type at the proposed wind farm comprises poorly drained acidic soils to the south and cutover blanket peat to the north. The soils underlying the proposed substation area are classified as deep, well-drained mineral soils corresponding to surface water gleys. The subsoils of the majority of the northern portion of the site are mapped as blanket peat, with the southern section of the site dominated by till derived from Namurian sandstone and shales. Site investigations undertaken within the proposed wind farm site indicate that peat depths vary from 0.1 m to 4.5 m in the north and 0.1 m to 1.8 m in the south. Bedrock outcrops are present across the proposed wind farm site, particularly concentrated to the north and centre. This was evident from site inspection of the general application site. Additionally, a number of geological faults runs through the proposed wind farm site, often delineating bedrock formations. The bedrock geology is varied and includes limestone, sandstone, shale and associated geological formations.

Karst features are formed from the dissolution of soluble rocks such as limestone and dolomite and characterised by underground drainage systems with sinkholes and caves. According to the GSI online viewer, there are no mapped karst features present with the proposed wind farm site boundary. Site surveys indicated there are 76 no. possible karst features present within the study area. The proposed wind farm infrastructure footprint will not intercept any identified karst features, thereby avoiding potential impacts on these karst landforms which often function as important conduits for surface water recharge to the underlying aquifer system.

According to the GSI, there is a designated Geological Heritage Site (GHS) which overlaps the eastern section of the proposed wind farm, namely Dough Mountain (Site Code: LM009) site. Dough mountain GHS covers an area of 10.26 km². GSI describes Dough Mountain as “a particularly complex site in terms of its’ geological history, and has an array of unusual karst features, upland ribbed moraines and straight-as-an-arrow stream gullies”.

Important receptors in terms of sensitivity and potential for significant effects are the karst features and peat stability (due to their susceptibility to disturbance and potential for ground instability) and the Geo-heritage site at Dough Mountain, which is a designated geological heritage feature.

The soils present within the proposed wind farm application site, Grid Connection Route works areas and Turbine Delivery Route accommodation areas are classified as being of low to medium sensitivity on a local scale. Peat within the footprint was previously drained for forestry, agricultural activity and turbary use.

11.2 Borrow Pits

Three no. borrow pit areas have been identified within the development footprint, borrow pit 1 located west of Turbine 1, borrow pit 2 located to the south of Turbine 8, and borrow pit 3 southwest of Turbine 13. These locations were selected based on geological mapping and site investigations with areas of shallow bedrock, or suitable material present.

Based on peat probe data and site observations, rock is shallow at Borrow Pit 1. Geological mapping and data from the GSI suggest that the underlying bedrock comprise of Medium grained sandstone and shale. The potential volume to be extracted is 21,600 m³ following removal of 13,500m³ of over burden.

Borrow Pit 2 is the largest of the borrow pits on site. Medium grained sandstone was observed from 2.5 metres below ground level in close proximity to the central borrow pit location. Laboratory testing on the recovered core samples indicates that the material is suitable for reuse in construction, particularly in hardstand areas

and along access roads. Groundwater levels are >8 m below ground level at Borrow Pit 2. The potential volume to be extracted is 174,720 m³ following removal of 50,400m³ of over burden.

Borrow Pit 3 is located to the south of the wind farm site. Weathered sandstone bedrock and thinly to medium bedded sandstone, interbedded with dark grey fine grained thinly bedded siltstone. Bedrock varies from 2.3 to 8.8 metres below ground level. Laboratory testing on the recovered core samples indicates that the material is suitable for reuse in construction, particularly in hardstand areas and along access roads. The potential volume to be extracted is 51,847 m³ following removal of 21,603 m³ of over burden.

The overlying peat cover at Borrow Pit 2 site is shallow (<1m), and its removal is expected to have minimal environmental impact. It is similar at Borrow Pit 1 whilst no peat was encountered in the testing of Borrow Pit 3. Overall, the borrow pits were deemed viable sources of suitable aggregate for on-site construction needs.

The combined volume to be extracted is 240,000 m³. A large, heavy-duty road-legal dump truck typically holds between 15 and 22 m³. This would remove between 11,000 - 16,000 such truck movements of having to pass through local urban centres bringing material from quarries to the site.

The total excavated material from hardstanding is 120,608 m³ comprising 67,672 m³, for the turbine foundation is 25,760 m³, for the proposed substation (not part of this application) is 4,465 m³, for access tracks is 22,531 m³ and for the temporary compounds is 10,511 m³.

11.3 Peat and Slope Stability

Using the GSI Landslides Database, there are no landslide events recorded within the proposed wind farm site boundary. The nearest recorded landslide event occurred 2.7 km south of the southern study area boundary. The southern slopes of Dough Mountain are characterised by two scree fall events, which are also recorded on the GSI database. These are located 2 km to the east of proposed turbine T14.

The GSI's landslide susceptibility mapping was used at a high level to assist in the identification of areas which are subject to landslides and is measured from low to high. The landslide susceptibility mapping is based on high level topographical, regional soils, geological and morphological information and is a good guide in the absence of more detailed site information. However, assessment of more detailed site information provides more a more robust representation of landslide susceptibility. The southern and central parts of the proposed wind farm site have been identified to be generally low in landslide susceptibility. The central and northern part of the proposed wind farm site have been identified as moderate to high susceptibility. Landslide susceptibility across the proposed wind farm is generally low at the proposed wind farm infrastructure locations. All turbine base locations and substation footprint are mapped as having 'Low' landslide susceptibility, except for T3, T4, T5, T7 and T8 turbine base locations mapped as having 'Low to Moderately High' landslide susceptibility.

Site investigations indicate that peat depths vary from 0.1 m to 4.5 m in the north and 0.1 m to 1.8 m in the south. The peat becomes deeper near T2 and T3, with depths varying between 0.2 and 4.5 meters. T4 also shows a range of peat depths from 0.3 to 2.55 meters. Towards the centre of the proposed wind farm site, from T5 to T10, peat depths vary between 0.3 and 2.0 meters. The southern area, near T13, has relatively shallow peat, with depths ranging from 0.2 to 0.4 meters. Finally, T14 exhibits peat depths ranging from 0.3 to 0.9 meters.

The ground investigations indicated that the proposed wind farm site is generally covered in a thin layer of shallow peat which often overlies sandy, gravelly and silty clay.

In relation to peat and slope stability, the chapter concludes that peat is generally shallow and has been modified by forestry, agriculture and local turf cutting. A dedicated Peat Stability Risk Assessment found the site to have an acceptable over-design factor, with a low to negligible peat failure risk following mitigation.

11.4 Dough Mountain Geological Heritage Site

The Dough Mountain geological heritage site is of scientific and educational importance and is therefore classified as a high-sensitivity receptor in this assessment. The proposed wind farm intersects only a small peripheral portion of the heritage site and does not require removal or alteration of key geological features or exposures. The overall integrity, visibility and interpretative value of the site will therefore be maintained. With the implementation of standard good-practice construction measures, the magnitude of impact on the Dough Mountain geological heritage receptor is assessed as low.

11.5 Assessment

There will be a change in land use associated with the proposed project. A total of 49.0 ha will be utilised for the construction phase on the proposed wind farm site, with 39.3 ha utilised for the operational phase. The main impact of the proposed project with regard to land use is the removal of topsoil, peat and vegetation (including forestry) along with some agricultural land. Calculated volumes of peaty podzol soils and peat to be excavated are 101,911 m³. There is no loss of peat or subsoil, as it will all be permanently relocated within the proposed wind farm site to the proposed borrow pits.

No likely significant effects were identified on land use, contaminated sites/potential for contamination, soil compaction, soil erosion, geohazards or geological heritage sites during the operational or decommissioning phase. No likely significant effects were identified on land use, contaminated sites, mineral/aggregate resources, or geological heritage sites during the construction phase. Soil compaction/erosion and geohazards were assessed as slight and slight-moderate effects respectively which are not considered likely significant per the adopted EIAR significance matrix. The Planning Authority would accept these conclusions based on the evidence presented.

The management of peat stability will be ongoing throughout the construction and operational stages of the project and will be managed through the use of a geotechnical risk register. Following application of mitigation measures, including consideration to the siting of infrastructure to minimise the risk, the findings of the planning stage PSRA (Appendix 7-1) indicate a “low” to “negligible” hazard ranking for instability related to the requirement for excavations on the proposed project subject to appropriate mitigation measures.

The removal of natural soil, subsoils, and rock and replacement with gravels and concrete for the construction of the infrastructure (temporary and permanent) will result in a change in ground conditions within the proposed wind farm site. During the operational phase, effects on land, soils and geology are assessed as limited. No further significant land use change is expected beyond that established during construction. Potential contamination risks are limited to occasional maintenance access and oil-containing equipment, which would be controlled through bunding and routine maintenance procedures. Effects on soil compaction, erosion, mineral resources, geohazards and geological heritage are assessed as imperceptible or not significant. Decommissioning effects are expected to be similar to construction effects but of lower magnitude. This is because below-ground foundations, access tracks, drainage infrastructure and the substation are proposed to remain in place, thereby reducing the extent of future ground disturbance.

The overburden material generally consists of shallow peaty soils underlain by stiff bluish grey slightly sandy gravelly silty clay with occasional angular to subangular cobbles and boulders. The soft peat conditions require removal for the wind turbine foundations. Deeper excavations to more competent material may be required to

construct the turbine foundations. Based on the ground investigation, the proposed foundations will be gravity foundations. For gravity type turbine foundations, unsuitable material will be excavated and replaced by structural fill and excavated material will be placed in the deposition areas i.e. the borrow pits.

The submitted assessment places strong emphasis on embedded mitigation and good construction practice. Key mitigation measures include implementation of the Spoil and Peat Management Plan, bunded fuel and chemical storage, separate storage of topsoil and subsoil, hydrocarbon interceptors, trenchless techniques at key crossings, concrete management controls, weather-related restrictions on earthworks and geotechnical supervision.

A Peat Stability Risk Assessment (PSRA) has been undertaken for the proposed project by Ciaran Reilly and Associates and is contained within Appendix 7-1 of the submitted EIAR. It is noted that the PSRA has been prepared in accordance with the document '*Peat Landslide Hazard and Risk Assessments, Best Practice Guide for Proposed Electricity Generation Developments – Second edition*' (Scottish Government, 2017) (hereafter known as the Scottish Guidance).

The PSRA documents that 5 no. shallow peat landslide events are recorded in the vicinity of the subject site and 2 no. shallow screes slides to the south of the site from an examination of the *Landslide Susceptibility Index* published by Geological Survey Ireland (GSI). In this regard, it is noted that proposed turbines T1 and T2 are located approximately 300m southwest of the nearest recorded landslide event, with proposed Borrow Pit 1 located approximately 200m southwest of the nearest landslide event. Similarly, it is noted that the hardstanding area for T1 and Borrow Pit 1 coincide with areas mapped as '*high*' landslide susceptibility based on GSI data. The remaining items of proposed wind farm infrastructure are mapped as being in areas ranging from '*Low*' to '*Moderately High*' levels of landslide susceptibility.

The PSRA does not provide further analysis on these recorded events in terms of failure mechanisms, runout behaviour, peat characteristics and similarities/differences with these events and the proposal site conditions. It is noted that section 3.2.2 of the Scottish Guidance requires an examination of previous landslide events. Set within this context, the lack of a more comprehensive analysis in this regard is concerning.

Site investigations over the years of 2022, 2024 and 2025 involved 46 no. trial pits, of which 31 no. trial pits encountered peat which ranged from depths of between 0.2m to 3.5m. The site investigations were used to guide the proposed location of infrastructure on the site (including micro siting) to minimise risk both in terms of peat stability and karst risk.

In accordance with the Scottish Guidance, a Qualitative Peat Stability Assessment was undertaken based on:

Hazard Ranking = Hazard x Exposure

Where:

- Hazard = The likelihood of the landslide event occurring
- Exposure = The effect and consequences that the event may have

Table 7 of the PSRA relates to the *Peat Stability Risk Register Summary* which identifies pre-control measure risk ratings and post-control measure risk ratings based on proposed wind farm infrastructure element locations which range from '*medium*' (for T1, T2, T3, T4, Borrow Pit 1, T6, T7, T8) in respect of pre-control measure risk ratings to '*Low*' for the remaining infrastructure elements. The detail provided in relation to control measures is considered very generalised and amounts to standard construction practices such as "*stepping or battering back of excavations to a safe angle (as determined through a slope stability assessment by a competent temporary*

works designer)", or "a temporary sheet pile wall or rock fill berm will be used to support the peat during construction". The lack of clearly identified and bespoke mitigation or control measures specific to the ground conditions of the relevant wind farm infrastructure elements gives rise to concerns surrounding the generalisation of this *Qualitative Peat Stability Assessment*, given the proximity of recorded landslide events, the extent of watercourses within the general area, the upland nature of the site and measured peat depths of 4.5m within areas of the subject site.

The PSRA also details a *Deterministic Peat Stability Assessment* which appropriately provides for an undrained and drained analysis in accordance with *Eurocode 7* requirements to determine the stability of the peat slopes on site. In this assessment, it is noted that possible effects of peat deposition in the short term in the case of temporary storage of peat "have been considered by the application of a 1m surcharge loading of peat in the calculations". No rationale or reference to applicable standards has been given for this value which further raises concerns regarding the application of generalised criteria in this assessment.

The stability analysis was completed with characteristic loads and soil strength parameters. The calculated over-design factor (ODF) must be greater than or equal to 1.0 for the design. The findings of the peat stability assessment showed that the proposed wind farm site has an acceptable ODF (1 or greater), is suitable for the proposed project development and is considered to be at low risk of peat failure. The sensitivity is considered high due to the presence of peat on the wind farm site. Due to the limited depth of peat and the PSRA results, the magnitude is low adverse. Potential effects are considered, slight, (not significant) long term, negative, direct and indirect with very low probability.

Specific peat stability measures include placing excavated peat in borrow pits below surrounding ground level, battering excavations back to safe angles, constructing access roads as founded roads, and installing monitoring posts in more peaty areas to detect movement. Emergency procedures, including the use of check barrages and catch ditches, are also proposed in the unlikely event of peat instability. The PSRA concludes with a series of recommendations for the construction, operational and decommissioning phases of the proposal. Such construction phase recommendations include the appointment of "an appropriately qualified Geotechnical Engineer for the construction stage to review and update the mitigations proposed in this planning stage PSRA. Detailed design stage PSRA to be developed. At this stage the geotechnical designer may require additional site investigations to refine the design". Another construction stage recommendation advises the development of "a Method Statement for the works to be carried out in each of the PSRA areas cognisant of the required mitigating measures", with the "Geotechnical Site Geotechnical Supervisor to approve the method statement".

Notwithstanding the extensive site investigation and planning-stage peat stability assessment undertaken, concern remains with the Planning Department regarding the extent to which critical aspects of peat stability management are deferred to post-consent stages of the project. The PSRA repeatedly identifies the need for further design-stage peat stability assessments, additional geotechnical review, site-specific temporary works designs, construction-stage supervision, monitoring regimes and ongoing risk reassessment. While such measures may form part of a robust construction management approach, they indicate that important elements of the peat stability evaluation remain to be completed after the grant of consent rather than informing the consent decision itself.

In particular, the assessment concludes that the development is acceptable on the basis that detailed design-stage mitigation measures will subsequently be prepared by suitably qualified geotechnical engineers and implemented during construction. The PSRA envisages future refinement of the design, potential additional site investigations, temporary works design for deeper peat areas, movement monitoring and ongoing review

of peat stability risks. This raises the question as to whether sufficient information has been provided at planning stage to conclusively establish the effectiveness of those measures and the residual level of risk.

There also appears to be a lacuna in the information presented regarding the precise implications of the proposed development for peat stability across the wider receiving environment. While the assessment considers stability at individual infrastructure locations, it provides comparatively limited analysis of the potential wider effects arising from cumulative excavation activities, peat excavation and storage, hydrological modification, drainage interventions, borrow pit operations and changes in groundwater conditions across the peatland system as a whole.

The Planning Authority requested a copy of the submission from the Development Applications Unit, Department of Housing, Local Government and Heritage to the proposed windfarm development and obtained a copy late on Monday 13th July. The view of the Planning Authority is supported by concerns raised by the Development Applications Unit in their submission.

“The Department therefore highlights the potential effects of the proposed development upon peat stability and the associated risks to dependent upslope habitats (i.e. upland Blanket Bog within the Dough/Thur Mtns NHA) and to protected downstream habitats and species in the Lough Gill SAC (site code: 001976) and Lough Melvin SAC (000428). The Department highlights that recent peat slippage incidents in Leitrim and Donegal (e.g. Meenbog wind farm) indicate that the ability of standard mitigation methods to cope with extreme dry and wet periods is unclear. Accordingly, the Department is concerned that the proposed design and citing of the turbines is not sufficiently cautionary and the EIA lacks sufficient evidence to support the efficacy of proposed mitigation measures during extreme dry and wet conditions as well as ‘normal’ conditions.”

Similarly, although the assessment acknowledges the presence of watercourses throughout the site and proposes mitigation measures to maintain hydrology, the analysis of wider catchment scale consequences, including the potential effects of any peat instability on downstream receptors and watercourses, is relatively limited. The assessment relies principally on mitigation and monitoring measures to control such risks rather than demonstrating in detail the extent to which those risks have been eliminated through design.

The proposed management of excavated peat also illustrates the degree of reliance on post-consent measures. While broad principles are identified, including use of borrow pits for peat storage, limitations on temporary stockpiles and geotechnical supervision, the detailed mitigation measures for peat placement, long-term storage stability, sequencing, capacity and associated geotechnical verification remain matters to be addressed at post-consent stage.

Accordingly, while the PSRA demonstrates a substantial level of planning stage assessment and is generally consistent with the Scottish Government methodology, there remains an arguable concern that aspects of peat stability assessment have been deferred beyond the consent stage. The resultant information gap limits the ability of the Commission, as competent authority, to fully evaluate the precise nature, extent and significance of potential peat stability impacts within the wider peatland environment and downstream catchments, and to assess with certainty the effectiveness of the proposed mitigation strategy.

In the report prepared by the Environment Department, a number of further observations and recommendations have been made, in relation to:

1. Temporary Waste Storage

Chapter 7 states that surplus excavated bitmac material will be brought to a recycling facility for processing and that all waste generated on site will be segregated and removed by licensed waste hauliers to appropriate facilities. It also notes that bitmac and similar materials will be dealt with under a circular-economy approach. However, the submitted assessment does not clearly say whether excavated road planings / tarmac will be temporarily stockpiled on site, and, if they are, under what waste authorisation or transfer arrangements that this would occur. The chapter covers final off-site disposal/recycling, but it does not expressly address the legal basis for any interim storage or handling before removal.

The Environment Department recommends that any temporary on site storage of waste, including excavated bitmac/tarmac, spoil or construction waste, shall occur only in designated areas and in accordance with waste legislation and any required waste authorisation. This matter could be addressed by condition.

2. Excavated Peat and Spoil

Excavated peat and spoil shall be managed strictly in accordance with the *Spoil and Peat Management Plan* and deposited only in approved areas under geotechnical supervision.

3. Hazardous Waste

The developer shall be required to provide a hazardous waste protocol including:

- identification of hazardous waste streams,
- bunded storage arrangements,
- spill kit waste procedures,
- licensed receiving facilities,
- transport and tracking arrangements.

4. Decommissioning Waste

The developer shall be required to provide a Decommissioning Waste Plan for agreement with the Planning Authority at least 12 months prior to decommissioning, detailing all waste streams, including turbine blades.

5. Record keeping

The developer shall be required to maintain records of all waste movements (quantities, EWC codes, collectors, receiving facilities) and make them available for inspection.

6. Peat Excavation

Excavation activities can have the effect of dewatering the peatland and its surrounding areas causing the water table to drop. The Environment Department is concerned that this presents a high risk of catastrophic peat slope failure if the mitigation measures outlined in Chapter 19 and the CEMP are not prioritised.

12. Hydrology and Hydrogeology

The chapter considers the impact of the proposed development on hydrology, hydrogeology, Water Framework Directive (WFD) compliance, flood risk, hydrologically connected designated sites, and potential transboundary effects due to the site's proximity to Northern Ireland and the hydrological connection to Lough Melvin. The assessment is built around identifying sensitive receptors, pathways and potential pollutant or flow-related impacts during construction, operation and decommissioning.

The site itself is characterised by a dense network of small upland streams, man-made forestry drains and modified drainage channels, reflecting its upland topography, forestry land use and steep to undulating terrain. These watercourses are generally flashy, eroding streams with moderate to steep gradients, and a number of them are already associated with existing forestry road crossings. Their morphology and topographic setting enhance their capacity to mobilise surface-derived pollutants, particularly during rainfall events. Within the site, drainage generally flows south and west toward the Owenmore (Manorhamilton) and Brackary systems linked to Lough Gill, and north/northeast toward the Lattone and Ballagh systems linked to Lough Melvin. A total of 11 no. watercourse crossings will be required within the wind farm site. The most credible contaminant migration pathway identified is surface water runoff. This pathway presents a risk of transporting pollutants off-site and into adjacent surface waters.

Project-specific field sampling at the proposed wind farm site and in associated streams recorded water chemistry broadly consistent with upland catchments influenced by limestone and mixed bedrock geology, including alkaline pH values, low to moderate suspended solids under normal conditions, and variable turbidity linked strongly to rainfall and discharge. Continuous turbidity monitoring since early 2025 confirmed that turbidity remains low in dry periods but can increase significantly during heavy rainfall events, which is typical of flashy upland systems.

A Stage 1 Flood Risk Assessment concluded that the wind farm site and principal infrastructure, including the substation, are not at significant flood risk, and that the development would not materially increase flood risk elsewhere provided the proposed drainage design is implemented. Some historic flood incidents are noted in the wider area, but these are outside the development footprint and do not place the site itself within Flood Zones A or B. No further consideration is required in this regard.

The report from the Environment Department notes that the hydrogeological setting of the proposed wind farm is more complex. The site overlies a mix of regionally important, locally important and poor aquifers, reflecting the varied bedrock geology. Of particular significance is the Dartry Limestone Formation, which is mapped as a regionally important karstified conduit aquifer. Other formations beneath or near the site include sandstone, shale and limestone units that range from moderate local productivity to generally poor groundwater productivity. The site and surrounding area overlie several groundwater bodies, including Glenaniff, Kiltyclogher, Kilcoo, Killarga South, Killarga, Dromahair and Glencar, all of which are classified as 'Good' status WFD and 'Not at Risk' for the current WFD cycle.

Groundwater vulnerability across the site varies from 'Low' to 'Extreme', depending on subsoil thickness, peat cover, bedrock exposure and the presence of karst. The northern and northeastern parts of the site, where blanket peat is more extensive, have relatively low recharge and lower permeability, whereas other parts of the site, especially areas with shallow limestone bedrock or karst features, have significantly higher recharge and greater vulnerability. Recharge rates across the site are therefore highly variable, ranging from very low values in peat-dominated zones to very high values where karstified or shallow bedrock conditions occur. Groundwater flow broadly follows local topography and drains toward local streams and watercourses, with some perched groundwater in peat and shallow subsoils, but deeper regional groundwater generally lies well below ground level. Groundwater is treated as medium to high sensitivity depending on aquifer classification, vulnerability and karst presence.

The report from the Environment Department notes that a particularly important hydrogeological issue is the presence of karst. Although no formal GSI-mapped karst features occur directly within the site footprint, field surveys identified 76 no. possible karst features within the study area, including dolines and swallow holes. The most notable is Polldough swallow hole/cave, located near the centre of the site, which demonstrates a

hydraulic linkage to a nearby stream. These karst features represent potential direct recharge pathways to groundwater and therefore increase sensitivity. However, the submitted assessment notes the proposed layout has been specifically designed so that no turbines, borrow pits, compounds or substation infrastructure are located within the required setback distances of identified karst features, substantially reducing direct risk.

Lough Gill SAC, Lough Melvin SAC, Lough Melvin SAC (Northern Ireland), the Dough/Thur Mountains NHA, and the Lough Melvin pNHA are all highly sensitive hydrological sites which are connected via downstream rivers such as the Owenmore, Brackary, Lattone and Ballagh. Their qualifying conservation interests include sensitive aquatic habitats, otter, crayfish, lamprey and peatland habitats. Downgradient streams and connected aquatic receptors are classed with a high sensitivity within the submitted assessment.

The construction phase is identified as the stage of greatest potential effect. The main identified risks are to surface water quality, through sediment-laden runoff, disturbed soil and peat, accidental fuel or oil spills, wet concrete contamination, and changes to local drainage patterns during earthworks, turbine foundation excavation, road construction, and bridge/crossing works. Indirect effects downstream may include altered drainage patterns, increased erosion, and pollutant mobilization that can affect water quality beyond the immediate construction area and over an extended period. Direct effects are immediate and localised impacts from construction activities, while indirect effects arise later and farther downstream due to changes in hydrology and pollutant transport pathways. Groundwater quality could also be affected if overburden removal or excavation were to open pathways to vulnerable aquifers, particularly in karst areas, while local groundwater levels may be influenced by temporary dewatering of turbine bases or borrow pits. Pre-mitigation, the chapter assesses construction effects on surface water quality and groundwater quality as potentially slight to moderate/significant negative, mainly because of the sensitivity of downstream waters and the possibility of short-term pollution events. Effects on water flow and flood risk are assessed as lower magnitude and generally slight or not significant.

Dewatering will likely be required during construction operations including turbine foundations and borrow pits. To minimise the potential effects associated with dewatering, there are no turbines or borrow pits proposed within 500 m of any well. This is sufficient distance to ensure no interaction with drawdown within the cone of depression. Borrow pits are proposed to be excavated up to 7m deep and this has potential to therefore locally affect groundwater levels, during construction. Turbine foundations will be excavated up to 4 metres below ground level. No groundwater was observed during the trial pit investigation works; however, perched groundwater may form at the upper contact of less permeable fine-grained soils following periods of sustained precipitation. Any such inflows will be managed through temporary local dewatering and collection, with subsequent discharge via onsite settlement and attenuation measures. Dewatering will be short term and highly localized and, combined with the 500 m buffer to all wells and the low permeability of the subsoils/bedrock, is not expected to cause any significant or measurable drawdown of groundwater.

The key potential operational risks are minor contamination from the substation or maintenance activities, local runoff from hardstands, and any slight changes in infiltration or runoff patterns caused by permanent infrastructure. However, because runoff is controlled using SuDS and operational traffic is limited, the likely operational effects on both surface water and groundwater are assessed as not significant, with only slight or imperceptible changes anticipated. During decommissioning, effects are expected to be similar to but less severe than those during construction.

A substantial number of embedded mitigation measures are outlined in the submitted assessment, supplemented by further construction-stage mitigation. Key measures include a *Surface Water Management Plan* (SWMP); *Spoil and Peat Management Plan*; hydrocarbon interceptors at construction compounds and the substation; off-site concrete drum washout; separate storage of topsoil and subsoil; setbacks from karst

features; clear-span bridges and limited culvert works; Horizontal Directional Drilling trenchless crossings for major Grid Connection Route crossings; sediment traps, silt fencing and settlement infrastructure; good forestry practice and brash mats during felling; and a full SuDS network including interceptor drains, swales, check dams and settlement ponds.

A particularly important feature of the drainage design is the provision of 25 no. settlement ponds to manage runoff and reduce hydraulic loading to receiving waters during rainfall events. The spoil deposition areas are also described as being set back from rivers, relatively flat, and topographically constrained, with controlled drainage routed through settlement ponds and overflow systems prior to discharge. Additional measures include infiltration basins at turbine locations, lined treatment measures where soils are limited, strict fuel and chemical management, and the ability for the Environmental Manager to stop works if mitigation is not being properly implemented.

The assessment concludes that, with the embedded design measures and proposed mitigation in place, the project will not cause significant adverse effects on surface water quality, surface water flow, groundwater quality or groundwater flow. It also concludes that there will be no significant flood risk effects, no significant residual effects, and no significant cumulative or transboundary effects, including in relation to Northern Ireland. Importantly, the chapter states that the proposed development will not compromise the achievement of WFD objectives for any relevant surface water or groundwater body. Overall, the Environment Department does not raise any serious concerns with regard to the submitted hydrology and hydrogeology assessment from a water environment perspective, provided that the identified control measures are implemented throughout construction, operation and decommissioning. A number of specific comments from the Environment Department are as follows:

1. Provide a Method Statement for the clear-felling activities which includes detailed reference to the timing of the works, the various approval stages including those from Inland Fisheries Ireland and the surface water drainage plan. Details shall include specific details of the surface water monitoring to be carried out during the clear-felling, the chemical, physical and biological monitoring proposed and identify responsibilities for this work. Split-sampling of monitoring samples may be required by the Environment Department in interests of water protection. It is recommended that this sampling should be continued for the duration of the clear felling and construction works.
2. Clarify, if it is proposed to incorporate a 50m buffer zone during the wind turbine construction phase for all streams. The Environment Department considered that further detail should be provided as to how these zones will be delineated, installed and managed within the site.
3. Locations agreed where continuous monitoring equipment shall be installed to monitor flow, turbidity and depth should be installed and retained in situ in the sampling locations on the Killanummery River_010, the Arigna River_010 and the Owengar River _010.
4. Clarify if silt fences will be installed on all the treated water outlets on all the proposed collector drains.

The Planning Authority would consider that all of these matters could be dealt with by way of conditions in the event of permission being forthcoming.

13. Biodiversity

The EIAR outlines that a comprehensive biodiversity impact assessment was undertaken using detailed desk studies, multi-year field surveys, and consultation with relevant statutory bodies to identify ecological constraints to development and to assess likely significant effects during the construction, operational and decommissioning phases of the proposed wind farm development. The design has applied the avoidance, mitigation and compensation hierarchy and best practice guidance. The baseline receiving environment

includes a range of important ecological features of variable ecological value from local to international importance, including peatland habitats and protected species such as bat species, otter, and marsh fritillary butterfly. In addition, the development site is hydrologically connected to protected European sites, most notably Lough Gill SAC and Lough Melvin SAC.

The EIAR notes that turbines, tracks and infrastructure have been sited to avoid likely significant effects on European sites, active peatlands and sensitive habitats and the breeding/resting sites of protected species. An Ecological Clerk of Works will supervise all works to ensure compliance and to implement adaptive mitigation where required. Protected species will be safeguarded through pre-construction surveys, exclusion zones and carefully timed works. For example, the project design avoids direct impacts on all known locations of the larval webs of the marsh fritillary butterfly. In addition, exclusion zones and solid screen barriers will be used to protect breeding habitat for the species.

In order to protect water quality and ensure no likely significant effects on downstream watercourses and European sites, construction activities will be controlled through best-practice environmental management, including strict surface-water protection measures, appropriate buffers will be maintained around watercourses, sediment and erosion control, surface water drainage systems, and the use of clear-span bridges and horizontal directional drilling. Dough/Thur Mountains NHA is located upslope of the proposed wind farm site. The potential significant effects which have been assessed for the NHA, include the degradation of peatland habitat associated with peat instability, drainage impacts, and dust deposition. The nearest wind farm infrastructure is located approximately 80 m from the boundary of the Dough/Thur Mountains NHA, exceeding the 30m buffer recommended to avoid indirect hydrological impacts on peatlands. Dust effects are also not anticipated, as the zone of influence for dust deposition is 50 m and intervening areas of conifer plantation provide additional screening. Accordingly, no direct or indirect effects on peatland habitats within the NHA are predicted.

An Invasive Species Management Plan will control and prevent the spread of invasive species throughout the proposed wind farm site and along the Grid Connection Route.

During operational phase of the wind farm, active wind turbines present a potential collision risk to local bat populations. The collision risk model has evaluated all proposed turbines as low, medium or high risk to local bat populations as appropriate. Effective industry standard mitigation measures to reduce the risk of collision will be implemented.

Activities associated with decommissioning are predicted to be of a substantially lower intensity than those during the construction phase. Furthermore, in most cases, the effects are expected to be of a similar type and magnitude to those anticipated during the operational phase. The decommissioning phase will not result in any significant effects on water quality as the drainage system, sediment traps, and clear span bridges will remain in place to serve the access roads.

To off-set potential likely significant effects on important ecological features, a number of habitat enhancement measures will be implemented within the enhancement lands, namely;

- Planting of 1.53km of Hedgerows (WL1)/Treelines (WL2) habitat to improve connectivity within the landscape; Management of 5.4ha of Upland blanket bog (PB2) and Wet heath (HH3) for peatland species;
- Management of 2ha of Wet grassland (GS4) for marsh fritillary;
- Planting of 2.3ha of (Mixed) broadleaved woodland (WD1) to compensate for loss of suitable foraging habitat for bat species.

Following mitigation and compensation, the EIAR concludes that no significant residual effects on biodiversity are anticipated as a result of the proposed development. The biodiversity assessment demonstrates that, although potential significant effects could arise in the absence of controls, following the full implementation of the proposed mitigation and compensation measures, the proposed wind farm development will not result in residual significant effects on habitats, species or European sites during construction, operation or decommissioning.

The comments included in the Environment Department report for this chapter of the EIAR have been prepared by the Biodiversity Officer, Ms. Rebecca Cogan. The *County Leitrim Biodiversity Action Plan 2026 – 2031* sets out a strategic framework to protect, restore and enhance biodiversity across the county, recognising its importance for ecological resilience, climate action and community wellbeing. The Plan adopts a partnership approach involving the Local Authority, communities and stakeholders, and is guided by national and EU biodiversity policy. It prioritises the conservation of priority habitats such as peatlands, wetlands and upland landscapes, the protection of species of conservation concern, and the strengthening of ecological networks and water quality, while promoting biodiversity awareness and integrating nature into land-use planning and development management. The plan is available at:

<https://www.leitrim.ie/council/services/biodiversity/county-leitrim-biodiversity-action-plan/>

In the view of the Biodiversity Officer, the submitted chapter on Biodiversity within the EIAR raises the following key potential areas of concern / likely non-alignment with the County Leitrim Biodiversity Action Plan (BAP):

1. Peatland Loss & Degradation Risk

The Leitrim BAP strongly prioritises protection, restoration, and avoidance of further damage to peatlands, especially Annex I blanket bog. The proposed development includes direct footprint impacts on blanket bog (PB2) including:

- Active blanket bog (Annex I priority habitat)
- Additional inactive/degraded bog with restoration potential

Even with micro-siting, the Biodiversity Officer notes that the proposed scheme still involves turbines, tracks, borrow pits and drainage within peatland areas.

Cutover bog is recognised as degraded but with restoration potential. However, emphasis within the submitted assessment is on impact management rather than net restoration gain. No clear commitment to peatland restoration at any meaningful scale or long-term biodiversity net gain is included therein. The loss/fragmentation of peatland has the potential to undermine county-scale restoration objectives.

2. High Sensitivity of SAC Linkages (especially Lough Gill)

The Leitrim BAP strongly supports Natura 2000 network protection beyond minimum compliance. The Lough Gill SAC is only 165 m from the proposed wind farm and direct overlap by Grid Connection Route (GCR) on multiple pathways, namely hydrological, hydrogeological and ecological. Other SACs are linked via groundwater (karst systems) and mobile species (otter, salmon). The density of pathways and proximity presents a high cumulative risk profile.

It is respectfully considered that An Coimisiún Pleanála, as competent authority, must be satisfied with regard to the potential impact of the proposed development on the qualifying interests and conservation objectives of Natura 2000 sites.

3. Hydrological Risk to High-Value Catchments

The Leitrim BAP prioritises water quality protection and safeguarding SAC-linked river systems (e.g. Lough Gill, Melvin) and aims to improve water status, not just to maintain their current status.

The Biodiversity Officer expresses a concern due to the extensive hydrological connectivity (22 river waterbodies + 3 lakes + estuarine systems) and direct links to highly sensitive SACs, especially Lough Gill SAC. Some downstream receptors are already at *Moderate* or *Poor* Water Framework Directive status. The submitted EIAR relies heavily on construction-phase mitigation assumptions, which are difficult to enforce long-term rather than avoiding the impact.

4. Fragmentation of Ecological Connectivity

The Leitrim BAP typically emphasises landscape connectivity (hedgerows, wetlands, peatland mosaics). The infrastructure footprint of the proposed development includes tracks, grid connection, Turbine Delivery Route works which will affect hedgerows, treelines, scrubland and peatland-heath mosaics. Linear features are acknowledged as important in the EIAR but are still subject to removal/alteration in places. The incremental fragmentation of habitats could undermine species movement (e.g. bats, otter, marsh fritillary.)

5. Over-Reliance on Mitigation vs Avoidance

The Leitrim BAP aligns with precautionary principle and avoidance hierarchy, especially for Annex I habitats and SAC pathways and would favour design-led avoidance of sensitive systems entirely. For multiple impacts (peatland, water, species), the submitted EIAR concludes “*no adverse effects after mitigation*”. It is the opinion of the Biodiversity Officer that there is heavy reliance on buffer zones, construction controls and good practice measures. This approach may be seen as optimistic / compliance-led rather than ecological-led. The EIAR references compensation and enhancement lands but there is no clear indication of measurable net biodiversity gain arising from their inclusion.

6. Species Risk – Particularly Marsh Fritillary & Aquatic Species

The Leitrim BAP highlights safeguarding of pollinators, freshwater species and Annex II species. There are records of Marsh fritillary (Annex II species) along site boundary. In addition, there are aquatic species at risk: salmon, lamprey, eel, white-clawed crayfish. Potential impacts primarily controlled via timing, buffers and mitigation.

7. Invasive Species – Risk of Spread via Construction

Invasive species management is a key Leitrim BAP action area. The EIAR states the existing presence of Japanese knotweed, rhododendron, balsam and American mink. Extensive earthworks and movement of material increase spread risk across catchments. The EIAR sets out that invasive species management will be addressed through a dedicated Invasive Species Management Plan (ISMP). However, the plan focuses mainly on preventing spread, rather than eradication or long-term control and relies heavily on contractor biosecurity compliance during construction.

14. Ornithology

14.1 Scope of Assessment

The potential for displacement and collision risk on hen harrier, listed under Annex I of the EU Birds Directive and amber-listed under BoCCI4, has been considered in the EIAR, with assessment detailed in Section 6.4.5.5. Nesting and foraging displacement have been assessed, and the resulting habitat loss estimates are presented in Appendix 6-12. The Leitrim Uplands non-designated important breeding area overlaps with the proposed wind farm site (only c. 2% of total non-designated important breeding area), and the breeding hen harrier

present form part of the Leitrim Uplands breeding population. Therefore, there are pathways for effects and so this ornithological feature was scoped in for detailed assessment. Effects on a small regional population have the potential to contribute to national population status. Surveys recorded regular breeding activity associated with the Leitrim Uplands non-designated Important Breeding Area, with up to two breeding pairs present in most years and occasional evidence of a third pair in the wider area. Nest locations varied between years, and all confirmed nests during the last four seasons were off-site. The number of breeding pairs recorded represents >1% of the national breeding population. No winter roosts were identified on or near the site but still likely some functional usage by foraging birds.

Other birds scoped in for more detailed assessment (breeding season and in some cases non breeding seasons too) included the common snipe, European golden plover, Lesser black-backed gull, White-tailed eagle, common kestrel, Eurasian woodcock and Whooper swan. Curmeen Strand SPA in Co. Sligo was also included as it comes within 20 metres of the Turbine Delivery Route.

It is stated in the submitted EIAR that while some of the adjacent landowners have signed up to hen harrier related prescriptions under agri-environment schemes, there is currently no concerted conservation action in place at the proposed wind farm site for breeding hen harrier, beyond the general measures that Coillte recommends for hen harrier management within its lands. While the *Hen Harrier Threat Response Plan* (NPWS, 2024) does mention overarching actions to minimise disturbance caused by forestry-related activities to hen harrier in non-designated important breeding areas, there are currently no plans to implement specific conservation actions in the future at the proposed wind farm site.

14.2 Mitigation by Design

It is indicated that the layout of the proposed wind farm has been specifically designed as part of the overall mitigation strategy for breeding hen harrier. It is contended that it is not appropriate to design the turbine layout around historical nesting sites as the nest sites varied year on year likely reflecting ongoing forestry cycles. However, turbines have been sited to maintain a minimum separation distance of 750 m from the two *Nesting Enhancement Areas*, ensuring that operational turbines will be located well outside zones likely to support hen harrier breeding activity. This buffer is considered sufficient to minimise disturbance to nesting birds, reduce the risk of displacement, and prevent behavioural disruption during the breeding season. Construction of the proposed project will lead to a total direct loss of 152.29 ha of habitats. Most of the habitats to be lost are commercial conifer plantation WD4 (133.1 ha), which are generally of lower value to biodiversity and important ornithological features (IOF) species more generally. Direct habitat loss could affect IOF species breeding within the proposed wind farm site, which include hen harrier, common snipe and Eurasian woodcock. None of the habitats to be lost are of particular importance for wintering IOFs because there were no large aggregations of wintering wildfowl or waders recorded foraging or roosting within the proposed wind farm site. There were also no winter roosts for raptors recorded during surveys.

14.3 Hen Harrier Compensation and Enhancement - Additional Compensation Measures

Potential loss of hen harrier foraging habitats due to operational displacement has been assessed comprehensively in the Hen Harrier Foraging Habitat Loss Report (Appendix 6-12). The analysis integrated desk-based research, field surveys, and GIS-based assessment to quantify habitat displacement effects based on both current and future habitat suitability over the lifespan of the proposed project. When planned forestry cycles were accounted for, it was predicted that up to 140 ha of foraging habitat could be lost to foraging hen harrier over the lifespan of the proposed project, which corresponded to 76 ha and 64 ha of higher and lower suitability habitats, respectively. This could potentially have a significant effect on up to two pairs of foraging hen harrier. Given the national importance of even a single breeding pair of hen harrier, a precautionary approach to compensation has been adopted, assuming the need to compensate for the potential loss of two

breeding pairs and approximately 140 ha of foraging habitat. Two dedicated nesting enhancement areas (NEAs) will be established, comprising 18.3 ha and 35.85 ha respectively, giving a combined total of 54.15 ha. These areas have been strategically located at least 750 m from all proposed turbine locations and positioned near known nest sites to maximise the likelihood of uptake by breeding hen harrier. The NEAs will be created from low-yield conifer plantation and will be managed to comprise of a mosaic of heath and scrub habitats. Although pre-thicket conifer plantations are also used for nesting, the available evidence indicates that breeding success is higher in open-moorland habitats (heath/shrub and bog) than in forestry habitats, which tend to provide suitable structure only during the early pre-thicket phase. This suggests that maintaining and restoring open habitats is likely to be more beneficial for breeding hen harriers than the rotational forestry currently present on site.

An *Outline Biodiversity Management Plan* (OBMP) (Appendix 6.13) has been prepared. The OBMP also proposes the enhancement of three folios of land totalling 164.25 ha to compensate for the predicted loss of foraging habitat. These lands are all located within 2 km of the NEAs, so are within the core foraging range of breeding hen harrier while also being located at least 450 m from all proposed turbine locations so are unlikely to be affected by disturbance from turbines. Enhancement measures will include inter alia changes to grazing regimes, rush management, hedgerow establishment and improvement, scrub development, and reduction or cessation of fertiliser application. Peatland habitats within the enhancement lands will also be restored through hydrological management, control of invasive species, and sensitive vegetation management. These measures are fully consistent with the habitat management actions promoted through national hen harrier conservation policy, including the *Hen Harrier Threat Response Plan* (NPWS, 2024). Together with the NEAs, which will also provide suitable foraging habitat as well as nesting habitat, the total area of land enhanced for foraging hen harrier will amount to 218.4 ha, significantly exceeding the estimate of the area of lands from which they are likely to be displaced.

Overall, taking account of the scale of habitat provision (218.4 ha enhanced relative to an estimated 140 ha foraging habitat loss), the siting and disturbance buffers, the evidence base for habitat selection and responsiveness, and the long-term security and management of the measures, and the commitment that the managed areas would provide better quality habitat than that which is present currently, the likelihood of success for the proposed compensatory measures is considered high and no likely significant effects on hen harrier remain.

14.4 Conclusions

The EIAR concludes that with embedded mitigation and good practice measures applied including turbine siting, seasonal timing of works, confirmatory pre-construction checks, disturbance-free buffers, pollution prevention measures, precautionary mitigation to reduce collision risk, operational monitoring and a compensation package for hen harrier, the proposed project is predicted to give rise to no significant residual effects on all assessed IOFs.

The proposed comprehensive compensation package has been designed to offset any potential effects relating to possible displacement of nesting hen harrier and a reduction in functional foraging habitat. This package will support hen harrier breeding productivity within the Leitrim Uplands non-designated important breeding area.

Cumulative and transboundary assessments conclude that no significant cumulative or transboundary effects are expected. A structured post-construction monitoring programme will be implemented to monitor the effectiveness of the mitigation measures.

In summary, subject to the implementation of all embedded and additional mitigation, monitoring, and the committed compensation measures, the proposed project is not predicted to result in any significant adverse residual effects on ornithological receptors at the population levels relevant to the EIAR.

14.5 Report from Biodiversity Officer

The comments included in the Environment Department report for this chapter of the EIAR have been prepared by the Biodiversity Officer, Ms. Rebecca Cogan.

In the view of the Biodiversity Officer, the submitted Ornithology chapter of the EIAR raises a number of key potential areas of concern / likely non-alignment with the County Leitrim Biodiversity Action Plan (BAP). This chapter raises significant concerns on ornithological grounds, specifically in relation to hen harrier (*Circus cyaneus*) and its supporting habitat. Hen harrier is a species of high conservation concern, listed on Annex I of the EU Birds Directive, and is a priority species under national biodiversity policy and the County Leitrim Biodiversity Action Plan.

1. Significant Impact on Hen Harrier

Hen harrier is an Annex I species under the EU Birds Directive, requiring strict protection of breeding sites and maintenance of sufficient habitat area and quality. The *Hen Harrier Threat Response Plan (2024–2028)* recognises that the species has declined significantly and may face extinction risk without intervention. Irish objectives are to “*cease, avoid, reverse, reduce or prevent threats*” to the species and its habitats. The protection of Hen Harrier strongly aligns with the Leitrim BAP objectives (upland biodiversity, raptor protection, habitat management).

The subject site overlaps with the Leitrim Uplands which are a nationally important breeding area for Hen Harrier. 1–2 breeding pairs have been recorded on/adjacent to site annually. The EIAR acknowledges a significant impact before compensation and predicts up to 140 ha functional habitat loss for Hen Harrier, which is a significant, long-term negative impact at national scale (pre-compensation). The Biodiversity Officer considers that site selection does not avoid core Hen Harrier territory. Development that causes known habitat loss or functional displacement directly conflicts with national conservation policy.

2. Reliance on Compensation Rather Than Avoidance

The Leitrim BAP emphasises firstly the avoidance of impacts on key species and enhancement as net gain, not a trade-off. The BAP aims to strengthen existing populations, not relocate or offset them. The Biodiversity Officer considered that significant hen harrier impact is not avoided and instead is offset by compensatory measures. However, compensation may not replicate functional habitat loss in the same ecological context. These measures offer a biodiversity trade off rather than protection. Compensation cannot fully replace lost or disrupted functioning territories.

3. Development in a Key Upland Bird Area

The Leitrim BAP strongly supports protection of upland habitat and maintenance of open peatland/heath bird assemblages. EU guidance for wind farm development is clear, and they must seek to avoid impacts on protected species and Natura networks. Bird sensitivity mapping in Ireland was specifically developed to prevent inappropriate siting in key bird areas [birdwatchireland.ie].

The subject site is located within an important non-designated upland breeding landscape. There are sensitive bird species present e.g. hen harrier, snipe, woodcock and red grouse. It is the view of the Biodiversity Officer that sensitive breeding landscapes should be avoided, not mitigated.

4. Disturbance & Displacement Effects During Construction and Operation

The Leitrim BAP emphasises not just habitat retention but the functional use of land by species and protection of viable breeding territories. Disturbance during construction as well as operational turbines can cause displacement of breeding and foraging birds which leads to effective habitat loss. The EIAR states that territory disruption is accepted and compensated.

5. Underestimation of Importance of Non-Designated Areas

The Leitrim BAP places strong value on locally important biodiversity areas and ecological networks. Farmland birds and other passerines are in serious decline and also need protection. The County Leitrim Biodiversity Action Plan emphasises the protection of upland habitats, the conservation of birds of prey and declining bird species and maintaining ecological integrity and connectivity of key landscapes.

The submitted EIAR recognises the upland area of the subject development site as important but relies on designation-driven protection and underplays local biodiversity value outside of the Natura 2000 sites. The EIAR explicitly does not treat passerines as primary targets and does not refer to passerine conservation priorities (BoCCI red/amber list).

6. Displacement and Habitat Loss

The project is sited within an active hen harrier landscape, leading to acknowledged significant impacts that are managed through compensation rather than avoided. It is the view of the Biodiversity Officer that functional loss of breeding/foraging habitat will have a real ecological impact. The EIAR concludes that there is no significant collision risk for all species based on modelling assumptions. However, surveys in the vicinity have recorded high-sensitivity species e.g. hen harrier, whooper swan and white-tailed eagle. For raptors, displacement and habitat change are often more important than collision. Key findings from the UCC WINDHARRIER project show that prey availability (small birds) decreased near turbines, especially within ~100 m. This directly affects foraging success, which is critical for breeding success. Reduced prey leads to reduced territory quality and eventual territory abandonment. This is functional habitat loss, even without direct mortality.

7. Cumulative Effects Possibly Underplayed

The Biodiversity Officer states that Leitrim has a growing wind energy footprint in addition to sensitive upland bird populations. The Hen Harrier Threat Response Plan explicitly recognises wind energy development as a pressure affecting hen harrier populations. Wind development is listed alongside forestry and agriculture. Hen harrier populations are already small (~108–157 breeding pairs nationally) and are declining and spatially restricted. Even moderate additional pressures (e.g. local displacement from wind farms) can be significant at population level.

The EIAR finds that there are no significant cumulative effects despite multiple nearby wind farms and commercial forestry nearby. The Biodiversity Officer replies that there is clear scientific and policy evidence that hen harriers require large, undisturbed upland habitats, and that wind farm development can reduce habitat quality, prey availability, and territory function. National policy explicitly seeks to avoid threats and restore habitats. Locating wind turbines within an active breeding landscape—where significant habitat loss and displacement are predicted—conflicts with both the precautionary principle and the objectives of the Hen Harrier Threat Response Plan and County Leitrim Biodiversity Action Plan.

14.6 Report from Development Applications Unit

The Department notes the proposed creation of two Nesting Enhancement Areas (NEAs) respective to two pairs of breeding Hen Harriers regularly utilising the site via the conversion of coniferous plantation. While the

Department expresses a preference for such forest to bog/heath restorations over the use of short-term management activities, the Department notes that the one-year lead-in time for the commencement of felling and enhancement works within the proposed NEAs in advance of construction activities is unlikely to provide suitable nesting alternatives as adequate mitigation for potential disturbance/displacement effects arising. Ongoing enhancement works would therefore be concurrent with construction related disturbances.

The precautionary requirement for a maximum disturbance distance buffer of up to 1km from known breeding sites is recommended during highly disruptive activities such as construction works with the associated increased audial disturbances. Notwithstanding any potential habituation to prior human activity that may currently exist (i.e. local roads), this is judged to be of a low-level in contrast to more substantial disturbances imposed by large construction projects such as windfarm developments. Whilst nesting locations have been noted to alter in response to the temporal availability of suitable habitat within conifer rotations cycles, the southern pair is noted to have remained largely within a core breeding area in close proximity to a number of proposed turbines. The CEMP states that works will commence at the southern end of the proposed wind farm site and therefore would be within the likely disturbance distances of nesting attempts by the southern pair in advance of any future relocation.

The Department notes that the creation of high-quality optimal nesting habitat will require sustained management to ensure the provision of adequate heather growth over a number of years and may not be suitable as alternatives within the short-term. Faster-growing species such as dense-sward grasses and thicket-stage scrub may render habitats as suboptimal for Hen Harrier in the absence of adequate ongoing management. Conifer seeding from adjacent plantations is also expected to occur. Expected timelines for the successful provision of optimal NEAs should therefore be realistic and deliverable. It is therefore recommended that the lead-in time for nesting enhancement works in providing suitable alternatives should be adequately progressed in advance of any potential displacement effects on Hen Harrier from known breeding areas during the construction phase. In addition, the efficacy of successful habitat management within the lifetime of the development should also be deliverable, i.e. the prevention of habitat deteriorations and nesting disturbance/displacement activities.

14.7 Planning Authority Response

The response prepared by the Biodiversity Officer is duly noted. The comments are largely based on the need to conserve and avoid impact, grounded in the actions and objectives contained in the Leitrim Biodiversity Action Plan (BAP) 2026-2031 which Plan was approved after the County Development Plan 2023-2029 was brought into force. The Leitrim BAP in turn is embedded in the County Development Plan 2023-2029, NH OBJ 10 refers.

NH OBJ 10 To support the implementation of the actions contained in the Co. Leitrim Biodiversity Action Plan 2022-2027 when finalised, or any successor plan, in partnership with all relevant stakeholders and subject to the availability of the necessary funding sources.

The overriding policy in relation to biodiversity in the County Development Plan 2023-2029 is provided in NH POL 10:

NH POL 10 To ensure the protection, conservation and enhancement of the biodiversity of the county.

The County Development Plan seeks the protection and sustainable management of the heritage of Co. Leitrim for the benefit of current and future generations. However, it also seeks to support renewable wind energy developments as outlined in the assessment of the principle of the proposed development against the policy framework contained in the County Development Plan. These two objectives may not always be mutually

compatible with each other and requires careful balancing of competing objectives in reaching decisions on development proposals.

15. Air Quality

Air quality sampling was not undertaken, on the basis that the receiving environment is expected to have good air quality due to the lack of major air pollution sources in the areas. This is considered to be a reasonable assumption. The submitted assessment indicates that there is a high risk of dust soiling impacts, a medium risk of dust-related human health impacts and a high risk of ecological impacts associated with the proposed works. As a result, best practice dust mitigation measures associated with high-risk works will be implemented to ensure there are no significant impacts at nearby sensitive receptors. In the absence of mitigation, dust impacts are predicted to be direct, short-term, negative and slight, which is overall not significant in EIA terms.

Best practice mitigation measures are proposed for the construction phase of the proposed project which will focus on the pro-active control of dust and other air pollutants to minimise generation of emissions at source. The mitigation measures that will be put in place during construction of the proposed project will ensure that the impact of the project complies with all EU ambient air quality legislative limit values which are based on the protection of human health. Therefore, the residual effect of construction of the proposed project will be short-term, direct, negative and not significant with respect to human health and ecology.

When the dust mitigation measures detailed in the mitigation section of this report are implemented, the residual effect of fugitive emissions of dust and particulate matter from the site will be short-term, direct, localised, negative and not significant in nature and will pose no nuisance at nearby human receptors and sensitive designated habitats. This is in line with the IAQM guidance (IAQM,2024) which states that significant effects on receptors will be prevented by the use of effective mitigation and hence, the residual effect will be not significant.

There will be indirect beneficial impacts to air quality from the generation of renewable electricity from the proposed project. There will be NO_x emission savings which may otherwise have been generated from fossil fuels. This is an indirect, long-term, slight, positive effect on air quality.

The report prepared by the Environment Department does not raise any issues with the submitted assessment which concludes that the proposed development will not result in any likely significant adverse air quality effects during construction, operation or decommissioning. With the implementation of the proposed mitigation measures, all residual effects are not considered likely to be significant. The Planning Authority is satisfied that construction effects will not be significant, and the Planning Authority fully accepts that there will be minimal operational emissions. The operational phase is expected to provide a modest long-term positive contribution to air quality through the displacement of fossil fuel electricity generation and corresponding reductions in NO_x emissions.

The Planning Authority notes from Chapter 7 (Soils & Geology) reference to any moderately weathered/fractured rock will be marginally rippable to requiring breaking/blasting if within proposed construction depth. Slightly weathered/fractured to fresh rock will require breaking/blasting. There is no consideration in this Chapter of the effect on air quality arising from possible blasting activities on site. In Chapter 9 (Noise), reference is made to a mobile crusher and rock breaker providing construction material and temporary storage of excavated material. There is no reference to blasting in Chapter 9. There is therefore an inconsistency in this regard between the overall assessment. The Commission shall satisfy itself in relation to whether blasting is proposed at the Borrow Pits and the air quality and noise impacts associated with such activities.

16. Climate

The assessment of climate has focussed on GHG (Greenhouse gas) emissions from the proposed project, over its lifetime and climate change risk assessment, that considered the proposed projects vulnerability to climate change. The EPA state that Ireland had total GHG emissions of 57.6 Mt CO₂e in 2024. This is 1.03 Mt CO₂e higher than Ireland's annual target for emissions in 2024. EPA projections indicate that Ireland has used 82.5% of the 295 Mt CO₂e Carbon Budget for the five-year period 2021-2025. This leaves 17.5% of the budget available for 2025, requiring a substantial 10.3% annual emissions reduction for 2025 to stay within budget.

The impact to climate as a result of a proposed project has been assessed as a whole for all phases. The proposed project will result in some impacts to climate through the release of GHGs due to its construction.

The proposed project has been designed to maximise its contribution to renewable electricity generation, significantly reducing climate impacts during operation. The total annual GHG emission savings will amount to 51,333 to 67,373 tonnes of CO₂e. By producing clean energy, the proposed project will directly support Ireland's transition to a low-carbon economy and help mitigate climate change. The project will have a positive annual impact on Ireland's overall GHG emissions of at least 0.4% per year of the national ETS target for 2030.

The proposed project has incorporated some minimal measures to reduce climate change impacts. Once mitigation measures are put in place, the effect of the proposed project in relation to GHG emissions is considered direct, positive and long-term. Guidance states that this is appropriate for a project which:

- The project's GHG impacts are mitigated through 'good practice' measures.
- The project has complied with existing and emerging policy requirements; and
- Fully in line to achieve Ireland's trajectory towards net zero.

Ireland's trajectory to net zero requires significant renewables generated from on and offshore wind farms and sets a high bar for projects with respect to assessment criteria. When considering climate change risk, with design mitigation in place, there are no significant risks to the project as a result of climate change however some vulnerability will remain. Where additional information becomes available, such as updated Eurocodes for design practices, these will be followed during detailed design to ensure the proposed project is robust in its residual climate vulnerability. In accordance with the EPA Guidelines (EPA, 2022), the significance of effect of the impacts to the project as a result of climate change are direct, long term, negative and not significant. No likely significant transboundary effects are predicted.

It is the view of the Environment Department that the proposed wind farm development generally aligns with the Leitrim Climate Action Plan's objectives to reduce greenhouse gas emissions, support renewable energy deployment, enhance climate resilience, and promote resource efficiency. The proposed wind farm is presented as contributing positively to national renewable electricity and emissions reduction targets, and Chapter 12 expressly acknowledges the relevant local climate policy context.

The report from the Environment Department also identified a number of matters which the Commission should satisfy itself in relation to:

1. Annualised Construction Emissions are used inconsistently

The chapter states total construction phase GHG emissions of 13,530 tCO₂e. Annualised over the stated 35-year project lifespan, this equates to approximately 387 tCO₂e per annum. However, Table 12-10 uses 566 tCO₂e as the "annualised GHG emissions due to construction phase". These figures would not tally with each other.

2. No GHG Emissions from Operation

The chapter states that there will be no greenhouse gas emissions from the operation of the wind turbines. It later scopes out operational vehicle emissions due to the low volume of maintenance traffic. Strictly speaking, the operation of the turbines themselves may not generate direct combustion emissions, but the operational phase may still involve minor emissions from maintenance vehicles, replacement parts, servicing, and ancillary activities. It shall be a matter for the Commission to consider the importance of this omission in the overall scale of the proposed development.

3. Decommissioning Emissions are scoped out but still relevant

The chapter states that decommissioning emissions are scoped out because they are expected to be a small proportion of total GHG emissions and are partly considered in turbine lifecycle assessments. This is not necessarily incorrect, but given the scale of the development, decommissioning should at least be clearly addressed through a qualitative commitment to resource recovery, recycling, waste management and responsible disposal. The chapter does refer to recycling of metal components, but the approach could be strengthened.

It is the view of the Environment Department that this chapter should confirm that a decommissioning-stage resource/waste management plan will be prepared and that reuse/recycling principles will be applied in accordance with circular economy objectives. This matter could be included as a condition by the Commission.

17. Archaeological, Architectural and Cultural Heritage

This chapter assessed the potential effects of the Lissinagroagh Wind Farm, Grid Connection Route (GCR), and Turbine Delivery Route (TDR) on archaeological, architectural, and cultural heritage resources.

As previously outlined, a 860m section of the proposed internal access road (within the townland of Cherrybrook) extends through previously undisturbed pasture fields to the south of the proposed wind farm site.

There are two recorded Archaeological Heritage sites within the proposed wind farm site. These consist of a ring-cairn and cist (RMP no. LE008-006001 and RMP no. LE008-006002, both located 146m to the northeast of the nearest proposed turbine (T03). There are a further 122 no. archaeological sites, or groups of sites, within the 5km study area (of the proposed turbines), 8 no. of which include redundant records. Five megalithic structures are located within the 5km study area of the proposed wind farm site, including two court tombs, a wedge tomb, an unclassified tomb and an unclassified megalithic structure. The nearest is a wedge tomb, located 1.1km to the northwest of T01. The proximity of the various archaeological heritage sites is identified in Table 14.7 of the EIAR.

The proposed wind farm site occupies marginal upland, with limited archaeological evidence for past human activity within the development boundary. Much of the proposed wind farm site has subject to commercial forestry activities, which are likely to have disturbed potential sub surface archaeological remains. As such, the overall archaeological potential of the wind farm site is considered low. However, it remains possible that some previously unknown archaeological sites and features may survive below the current ground level across the proposed wind farm site, particularly in areas of rough pasture and bog that has not been disturbed by commercial forestry (T03, T07 and T09). T03 is located within 146m of a ring cairn and cist, with several prehistoric ceremonial sites located within 1.5km to the north. T03 therefore has a higher potential for sub-surface archaeological remains to be present.

There are 12 no. recorded structures of architectural merit, or groups of structures, within the 5km study area of the proposed turbines, including nine no. protected structures, or groups of structures. The proximity of the various built heritage sites is identified in Table 14.8 of the EIAR. The nearest feature of a worker's house in Lissinagroagh townland located 1.65 km southwest of T14. Additionally, 66 no. previously unrecorded sites of cultural heritage significance have been identified within the 2km study area of the proposed turbines as part of this assessment. A number of these are within the site and included dry stone walls, lazy beds, hut sites, buildings and sites on 1908 OS maps marking well, buildings and lime kiln (no upstanding remains evident or not accessible). The construction of the proposed wind farm site will result in direct effects on nine previously unidentified Cultural Heritage sites which are situated within proposed works associated with the project.

Infrastructure associated with the proposed wind farm site intersects eight no. townland boundaries while both the proposed Turbine Delivery Route and the proposed Grid Connection Route each intersect one such boundary.

The construction of the proposed wind farm site will not result in any direct, negative effects on the upstanding remains of recorded archaeological or built heritage resource as none of these sites are located within the footprint of the development that require excavations and ground works. It would be a matter for the National Monuments Service to confirm to the Commission that they are satisfied with this conclusion. The proposed wind farm site is partially located within a prehistoric landscape, which incorporates several monuments with ceremonial/ritual associations. In addition to the individual setting of these monuments, intervisibility between them has been considered. It is concluded that the proposed turbines will not significantly impact the visual relationship between these monuments although proposed T03 and associated hardstand will interrupt sightlines between these two monuments. The construction of the Turbine Delivery Route through green fields in Cashelaveela townland will alter the setting of the adjoining ringfort. A track will be located in the previously greenfield space c. 25m to the west of the ringfort. The operational phase of the proposed wind farm and Turbine Delivery Route will result in indirect effects ranging from imperceptible to moderate.

Prior to the commencement of construction, a programme of archaeological test trenching will be carried out at the greenfield locations across the proposed wind farm site. This work will be carried out under licence to the National Monument Service. Dependent on the results of the testing assessment, further mitigation will be implemented as required and agreed with the National Monuments Service. A large portion of the proposed wind farm site is dominated by forestry, which is not suitable for archaeological test trenching. Archaeological monitoring of topsoil stripping will be carried out at these locations of the proposed wind farm site, including areas adjacent to watercourses. This includes T03.

The Chapter identified that a c. 20m length of the wall of the Leminea Bridge may be required to be lowered to accommodate oversail. This bridge carries the L6184 over the Owenmore River. The bridge walls consist of square-cut stone blocks. No other built heritage elements in Manorhamilton are identified in this regard which is an oversight in my opinion based on consideration of the submitted Swept Path Analysis Report. The remains will be subject to a detailed photographic and written record prior to the construction of the proposed project, carried out by a suitably qualified archaeologist. Following the delivery of the turbine components, it is stated that the wall will be reinstated. The Planning Authority is not aware that Leitrim County Council has consented to such works occurring to the bridge. The assessment also indicates that a section of a dry stone wall at Cashelaveela will have to be demolished to facilitate the Turbine Delivery Route. This is within the new section of track constructed from Cherrybrook to the wind farm site.

The Turbine Delivery Route travels through Manorhamilton town and there is potential for accidental damage to the built heritage within the ACA. There are a number of RPS/NIAH buildings along the streets immediately adjacent to the haul route in particular, the milestone (RPS No. 37 / NIAH 30805007), The Glens Centre (RPS No.

36 / NIAH 30805024), Presbytery (NIAH 30805028), St. Clares Church (RPS No. 57 / NIAH 30805029) and the Water Pump in front of Hospital (NIAH 30805032). The report has already dealt with this matter in the section of the report which deals with Traffic and Transportation. The Planning Authority is not satisfied that adequate consideration of the built heritage impacts of the Swept Path Analysis has been undertaken in this chapter which deals with archaeology in a more comprehensive manner than built heritage.

The Environment Report has also identified a couple of inconsistencies in this chapter but nothing which the Planning Authority would consider significant.

18. Material Assets

The Material Assets assessment focuses on potential interference with telecommunications and aviation activity, possible disruption to utility assets and service provision, and the generation and management of waste during the construction, operational and decommissioning phases. The assessment outlines the extent of consultation which took place with aviation, telecommunications and utility stakeholders.

During construction, potential effects on aviation are considered unlikely to be significant to include Sligo Airport. The aviation assessment also notes that the proposed turbines are outside Irish Air Corps restricted areas and are unlikely to affect the Garda Air Support Unit or Emergency Aeromedical Service.

Telecommunications interference during construction is generally considered unlikely and would mainly be confined to the final stages when cranes are used for turbine erection. The main identified potential construction-phase issue relates to the 2RN VHF off-air radio link between Truskmore and Monaghan, where excavation, crane operations and turbine erection could affect signal quality and service reliability if unmitigated.

Telecommunications effects during operation are more relevant because turbines can cause electromagnetic interference, reflect signals or physically obstruct microwave links. The Telecommunications Impact Assessment identified a potential effect on the 2RN VHF off-air radio link between Truskmore and Monaghan, with 3D analysis indicating that turbines T05 and T06 would obstruct the Fresnel Zone of the link. Without mitigation, this could degrade signal quality and reduce service reliability, resulting in a moderate, negative effect over the operational life of the wind farm.

The assessment also identified that, while there would be no direct impact on the Adelphi/Net1 link between Dough Mountain and O'Donnell's Rock, the clearance between turbine T13 and the link's Fresnel Zone would be relatively small. Potential operational interference could therefore arise without mitigation.

Operational effects on other material assets are limited. No significant excavations or works are proposed during operation, and no effects on underground services are predicted. The wind farm is expected to support 2–3 long-term technical roles in operation and maintenance. Wastewater generation is estimated at approximately 1,800 litres per year, based on up to three staff visiting once per month, and municipal waste generation is estimated at approximately 922.5 kg per year. Waste and wastewater quantities are therefore substantially lower than during construction and are assessed as giving rise to a long-term, imperceptible, negative effect on local waste services, permanent only for any waste sent to landfill.

Mitigation during operation includes inclusion of turbines in the IAA Electronic Air Navigation Obstacle Dataset, agreement of aviation lighting with the IAA and Irish Air Corps, and provision of as-constructed turbine co-ordinates to the IAA. For telecommunications, further consultation will take place with 2RN and Adelphi/Net1, and mitigation options include re-routing links, using fibre circuits, replacing existing links with alternative

point-to-point links, increasing antenna height, or relaying links via a mast within the wind farm site. With these measures in place, no significant residual effects on aviation, telecommunications, utilities, waste services or other material assets are predicted.

The report prepared by the Environment Department considers that the waste assessment presented in Chapter 15 of the EIAR is not sufficiently detailed to demonstrate compliance with EPA guidance or to support the conclusion that waste impacts will be “*not significant*”. It is considered that the chapter provides only high-level estimates and does not include the level of quantification, waste-stream analysis, or mitigation detail expected for a project of this scale. This is elaborated further:

1. Insufficient Waste Quantification

- Construction waste is presented as a single municipal waste figure (61,500 kg) with no breakdown by waste type.
- No quantification of construction and demolition (C&D) waste, including timber, metals, plastics, concrete washout, cable offcuts, turbine packaging, or hazardous waste.
- Operational waste quantities are similarly high-level and lack waste-stream detail.

2. Absence of Resource and Waste Management Plan (RWMP) - Aligned Structure

Chapter 15 does not reflect a RWMP content. The identified elements include:

- Waste hierarchy application;
- Design-stage waste prevention;
- Detailed waste stream identification;
- Reuse/recycling targets;
- End-destination facilities and capacity assessment, and;
- Waste tracking and record-keeping arrangements.

3. Hazardous Waste is not addressed

The chapter does not identify or assess:

- Oils, lubricants, hydraulic fluid;
- Spill kit residues;
- Transformer-related waste, and;
- Hazardous waste arising during decommissioning.

4. Decommissioning Waste Omitted

There is no assessment of:

- Turbine dismantling waste volumes;
- Foundation removal waste;
- Cable recovery waste, and;
- Turbine blade end-of-life management.

5. Receiving Facility Assessment Absent

The EIAR identifies nearest EPA waste licenced sites but does not:

- Confirm acceptance of specific waste types;
- Assess facility capacity;
- Consider regional constraints, and;
- Provide contingency arrangements.

6. Mitigation Measures Generic

Mitigation is limited to segregation and use of permitted collectors.; the assessment lacks

- Waste prevention measures;
- Hazardous waste storage protocols;
- Spill response procedures, and;
- RWMP implementation and monitoring.

The conclusion therefore that wastes impacts are “*not significant*” is not evidence-based due to:

- Lack of detailed quantification;
- Lack of waste-stream analysis;
- No assessment of receiving facility capacity, and;
- No cumulative impact consideration.

In order to meet with EPA and Leitrim County Council expectations, the developer should be required to provide:

1. A full RWMP-aligned waste assessment, including detailed waste stream identification and quantification.
2. A breakdown of all construction, operational and decommissioning waste types, including hazardous waste.
3. Identification of permitted waste collectors and licensed receiving facilities, with confirmation of acceptance and capacity.
4. A commitment to prepare and implement a full RWMP prior to the commencement of construction.

19. Major Accidents and Disasters

Chapter 17 of the submitted EIAR deals with Major Accidents and Natural Disasters and assesses both the vulnerability of the proposed project to major accidents and/or natural disasters, and the potential for the project itself to cause such events during the construction, operational and decommissioning phases.

The chapter identifies that the project is located in a geographic context where extreme natural hazards such as earthquakes and tsunamis are not considered materially relevant. However, it acknowledges that severe weather events, including high temperatures, drought, heavy rainfall, snow and extreme winds, may increasingly occur and could disrupt project activity. Climate change-related risks were considered therein, including increased storm frequency or intensity, heightened flood risk and extreme temperatures. However, the *Climate Change Risk Assessment* did not identify any residual medium or high risks to the proposed project, and this risk was therefore screened out from further major accident/disaster assessment.

Flooding was assessed as a potential risk during construction, operation and decommissioning. The *Flood Risk Assessment* determined that the proposed project is located within Flood Zone C, where flood risk is highly unlikely, and that the project will not increase flood risk elsewhere. Fluvial, coastal, groundwater and pluvial flooding risks were therefore screened out from further assessment.

Ground or surface water contamination during construction was identified as a potential risk, with possible causes including heavy rainfall, excavation works, fuel spills, seepage, exposed sediment from stockpiles and erosion. However, this matter was assessed in the hydrology and hydrogeology chapter, and with mitigation measures in place no likely significant effects were anticipated. It was therefore screened out from further assessment.

Peat movement or landslide risk was considered, particularly in relation to excavation, mismanagement of material, storm events or flooding. The *Peat Stability Risk Assessment* concluded that, following mitigation, the hazard ranking for instability is low to negligible, and this risk was screened out from further assessment.

The project is not a COMAH/Seveso establishment, and no Upper or Lower Tier COMAH establishments are located close to the proposed wind farm site. The closest identified COMAH establishment is the Lower Tier Lough Gill Distillery in Hazelwood, Co. Sligo, located approximately 20 km from the wind farm site, approximately 11 km from the Grid Connection Route at its nearest point and approximately 1 km from the Turbine Delivery Route at its nearest point. No likely significant interaction with a COMAH site is anticipated.

Aviation-related collision risk involving low-flying aircraft was considered. The chapter relies on the aviation assessment in the Material Assets chapter and Appendix 15-2, which concluded that no significant aviation effects are anticipated. This risk was therefore screened out from further consideration.

The risks therefore carried forward for detailed assessment were:

1. Striking major infrastructure;
2. Major construction traffic accidents;
3. Collapse or damage of turbine or substation structures;
4. Fire at turbines, substation or forestry; and
5. Ice fall from turbine blades.

The risk of striking major infrastructure during construction was screened in for detailed assessment. This risk relates mainly to potential interaction with unknown strategic underground services, such as power, water, gas and telecommunications infrastructure, particularly during Grid Connection Route works and Turbine Delivery Route accommodation works. Possible consequences include infrastructure damage, disruption to services, injuries or fatalities. Following mitigation, the risk of striking major infrastructure is assessed as very unlikely, with a serious consequence rating and a risk score of 6, placing it in the green/low-risk category. Mitigation includes preliminary desktop utility review, confirmatory checks for water, gas and electricity services before construction, continued consultation, and inclusion of emergency protocols within the Construction Environmental Management Plan and Emergency Response Plan.

Major traffic accidents during construction were also screened in for further assessment. This risk arises from heavy vehicles using narrow roads, temporary traffic management measures, driver error, or failure to follow re-routing or traffic management instructions. The potential severity was considered high enough to require further assessment. Following mitigation, the risk of major construction traffic accidents is assessed as very unlikely, with a serious consequence rating and a risk score of 6, placing it in the green/low-risk category. Mitigation includes implementation of a construction Traffic Management Plan, reduced heavy vehicle movements through use of onsite borrow pits, and ongoing consultation with the Local Authority, An Garda Síochána, emergency services and other stakeholders.

Collapse or damage of turbine structures or substation infrastructure was screened in for further assessment. Potential causes include heavy vehicle collision and severe weather. The risk was considered relevant because of the potential for serious injury or structural damage should such an event occur. Following mitigation, the risk of turbine or substation collapse/damage is assessed as very unlikely, with a serious consequence rating and a risk score of 6, placing it in the green/low-risk category. The chapter notes that confirmatory ground investigation will inform detailed design, competent contractors will be appointed, turbines are designed for high-wind environments, and no dwellings are located within 760 m of the proposed turbine locations.

Fire at turbines, the substation or onsite forestry was screened in for further assessment. Potential causes include lightning strike, equipment failure or wildfire, with possible consequences including infrastructure damage and/or injuries. Following mitigation, the fire risk is assessed as very unlikely, with a serious

consequence rating and a risk score of 6, placing it in the green/low-risk category. Mitigation includes turbine lightning conductors, substation fire safety measures, fire walls and shut-off systems, forestry firebreaks, ongoing forestry management and an Emergency Response Plan addressing fire protocols.

Ice fall from turbine blades was screened in for further assessment because of the potential for injury or damage from falling or flying ice. The chapter notes that recognised wind energy guidance refers to the possibility of injury from ice or damaged blade fragments as very remote. Following mitigation, the ice fall risk is assessed as very unlikely, with a limited consequence rating and a risk score of 4, placing it in the green/low-risk category. The chapter notes that modern wind turbines include anti-vibration sensors to detect imbalance caused by blade icing and prevent start-up, and that modern turbines may include anti-icing systems using electro-thermal blade heating elements.

The chapter concludes that, with mitigation measures implemented, there will be no significant residual effects from the proposed project in relation to major accidents or natural disasters. It also concludes that no significant cumulative or transboundary effects are anticipated.

No comments or observations was raised in any of the accompanying reports prepared by individual departments within the Planning Authority with respect to the methodology, the risks carried forward for further assessment, the mitigation measures proposed and the overall conclusions reached. The Planning Department has already raised questions with regard to the adequacy of the *Peat Stability Risk Assessment* which was accepted by the authors of this chapter and screened out for further assessment. This is considered as the real risk of a major disaster occurring and the Planning Authority notes the comments of the DAU in their submission in this regard. The comments of the Fire Office are noted. This report forms Appendix III of this report.

20. Natura Impact Statement

20.1 Overview

The Natura Impact Statement (NIS), prepared by TOBIN, assesses the potential effects of the proposed Lissinagroagh Wind Farm, Co. Leitrim, on European sites. The project comprises 14 no. wind turbines, associated access tracks and drainage, an on-site 110kV substation, an underground Grid Connection Route to Srananagh substation in Co. Sligo, and Turbine Delivery Route accommodation works from Killybegs, Co. Donegal to the wind farm site. The submitted NIS supports the Stage 2 Appropriate Assessment process for An Coimisiún Pleanála.

The approach to preparing the NIS is summarised therein as follows:

- Describe how the proposed project will affect the key species and key habitats of the European sites;
- Describe how the integrity of European sites is likely to be affected by the proposed project;
- Describe what measures are to be introduced to avoid, reduce or remedy the adverse effects on the integrity of the European sites; and
- Consider findings and determine if potential for adverse effects on European sites remains after such measures have been implemented and in-combination with other plans and projects.

The Appropriate Assessment Screening concluded that likely significant effects could not be excluded, in the absence of mitigation, for a number of European sites within the Zone of Influence. It concluded:

“Likely significant effects on the European sites within the ZoI of the Proposed Project, individually or in combination with other plans and projects, cannot be excluded beyond reasonable scientific doubt, in view

of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites. This conclusion has been reached without taking any mitigation measures into account. Therefore, it is considered that the Proposed Project should progress to the next stage of the appropriate assessment process to determine if it will adversely affect the integrity of thirteen European sites and to propose mitigation.

We therefore submit that the competent authority, in this case An Coimisiún Pleanála, can determine that an Appropriate Assessment is required for the following European sites:

- Arroo Mountain SAC;
- Ballysadare Bay SAC;
- Ballysadare Bay SPA;
- Ben Bulbin, Gleniff and Glenade SAC;
- Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC;
- Cummeen Strand SPA;
- Donegal Bay SPA;
- Drumcliff Bay SPA;
- Glenade Lough SAC;
- Lough Derg (Donegal) SPA;
- Lough Gill SAC;
- Lough Melvin SAC;
- Lough Melvin SAC (NI); and,
- Unshin River SAC.”

The main potential impact pathways identified are habitat loss, groundwater contamination or alteration of groundwater flow, sedimentation or contamination of surface waters, disturbance or displacement of qualifying interest and special conservation interest species, bird collision risk, and the spread of invasive alien species. The most significant risks are associated with the construction phase, particularly excavation, dewatering, forestry felling, vegetation clearance, trenching along the Grid Connection Route, watercourse crossings and temporary works along the Turbine Delivery Route.

The habitat loss at construction phase is not within the proposed wind farm site but rather the Grid Connection Route will result in the loss of 10m of Hedgerow (WL1) habitat within the boundaries of Lough Gill SAC to facilitate the proposed temporary launch pit at Horizontal Directional Drill Site 1. A further 0.01ha of (Mixed) broadleaved woodland (WD1) c. 70m beyond the boundary of Lough Gill SAC in Milltown Forest Recreation Area will also be lost. This habitat may be of value for commuting and/or resting European otter, which is a QI species for the SAC.

Groundwater effects are a key issue due to the presence of karstified aquifers. In the absence of mitigation, excavation and dewatering could affect groundwater-dependent habitats and species in SACs such as Arroo Mountain, Ben Bulbin, Gleniff and Glenade, Glenade Lough and Lough Gill. Potentially affected receptors include petrifying springs, wet heath, blanket bog, alkaline fens, transition mires, eutrophic lake habitat, slender naiad and white-clawed crayfish. Vulnerability depends on the quantity of contaminants that can reach the groundwater, the time taken by water to infiltrate to the water table and the attenuating capacity of the geological deposits through which the water travels. Groundwater flow through karst areas is extremely complex and difficult to predict. The NIS considers the potential for adverse effects on ground water dependant QI habitats through groundwater contamination associated with site excavation works at T3 and the road cuttings associated with the western site entrance, as well as T11 and the nearby substation and construction compound with regard to the Arroo Mountain SAC. Dewatering to accommodate construction activities at T3

and T11 has potential to cause measurable drawdown of groundwater, which constitutes a potential for adverse effects on the hydrological regime of groundwater dependant habitats.

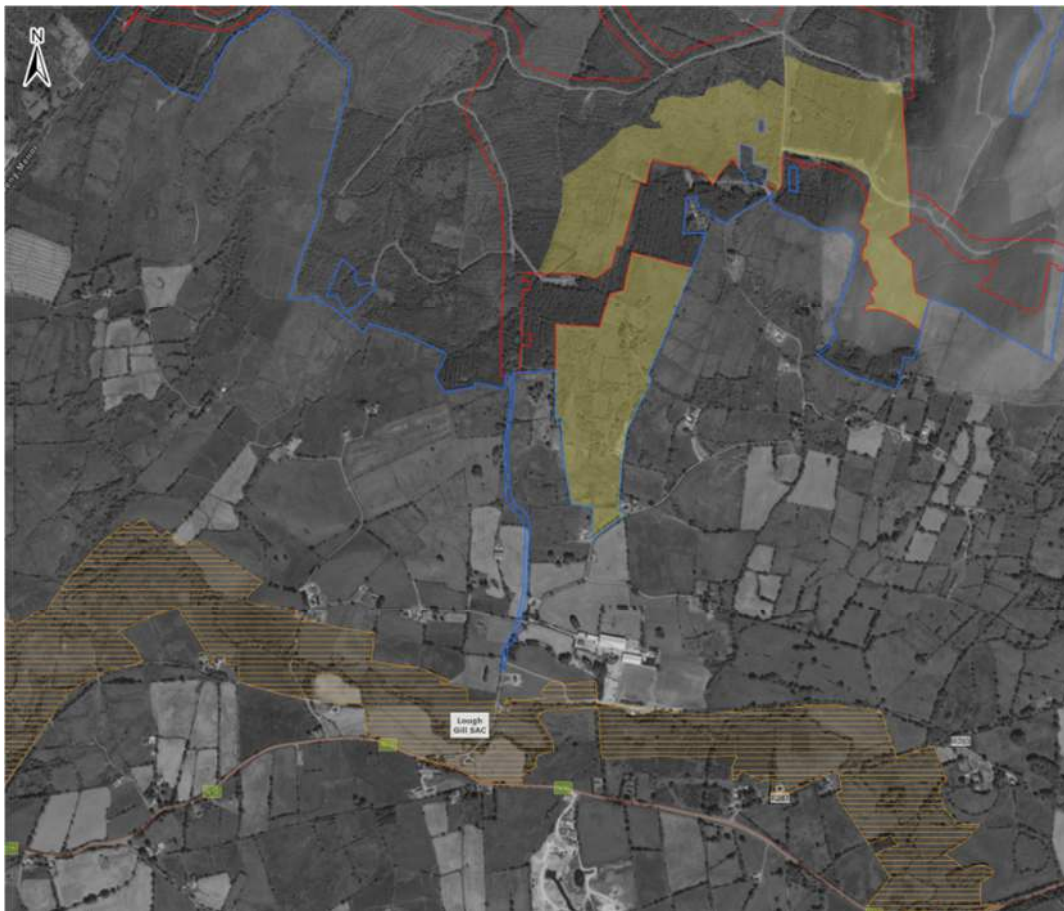


Figure 20: Lough Gill SAC and the southern entrance to the proposed Wind Farm Site (Source: NIS, Figure 8)

From a Co. Leitrim perspective, the NIS acknowledges the potential contamination from site excavations and dewatering during the construction phase and/or alterations to groundwater flow would constitute the potential for adverse effects on the integrity of **Arroo Mountain SAC** by undermining the conservation objectives for the Annex I habitat type 7220 Petrifying springs with tufa formation (Cratoneurion), for the Annex I habitat type 4010 Northern Atlantic Wet Heath with *Erica tetralix* and for the Annex I habitat type 7130 Blanket bog (*if active).

With regard to the **Ben Bulbin, Gleniff and Glenade SAC**, dewatering at T11 as well as potential contamination from site excavations at T11 as well as the nearby substation, construction compound, and western site entrance, constitutes potential for adverse effects on the integrity of the SAC by undermining the conservation objectives for the Annex I habitat type 7220 Petrifying springs with tufa formation (Cratoneurion), for the Annex I habitat type 7230 Alkaline fens, for the Annex I habitat type 4010 Northern Atlantic wet heaths with *Erica tetralix*, for the Annex I habitat type Blanket bog (* if active), for the Annex I habitat type 7140 Transition mires and quaking bogs, for the Annex I habitat type 6430 Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels and for the Annex II species 1355 European otter.

The construction phase of the proposed wind farm site, specifically the site excavations along the western site entrance towards the nearby substation and construction compound as well as the turbine hardstand at T11, constitute a source of potential contamination of the Glencar Ground Water Body (GWB). Karstification is extensive throughout the Glencar GWB. As the Glencar GWB also encompass Glenade Lough SAC, this

constitutes potential for adverse effects on groundwater dependent receptors within the SAC. As such, there is potential for adverse effects on the QI habitats and species for Glenade Lough SAC which are groundwater dependent as a result of alterations to groundwater quality, flow, and drawdown during the construction phase of the Proposed Project, namely 3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation; 1092 White-clawed crayfish; 1833 Slender naiad.

Lough Gill SAC [001976] is located c. 165m south of the application site boundary for the proposed wind farm site. The proximity of the proposed wind farm site to the SAC is shown in Figure 20. There will be no loss of QI habitat within the SAC. As such, there is no potential for adverse effects on QI habitats, in light of their conservation objectives, or the overall integrity of Lough Gill SAC as a direct loss of habitat. There is no potential for adverse effects on the groundwater dependant habitats of Lough Gill SAC, namely 3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation; and 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, *Alnus incanae*, *Salix albae*).

The NIS considers that there is potential for adverse effects on the integrity of Lough Gill SAC during the construction phase, by undermining the conservation objectives for QI species:

3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation;
91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, *Alnus incanae*, *Salix albae*); 1092 White-clawed Crayfish;
1095 Sea Lamprey;
1096 Brook Lamprey;
1099 River Lamprey;
1106 Atlantic Salmon ; and,
1355 European otter.

In addition, the presence of Invasive Alien Species along the Grid Connection Route constitutes potential for adverse effects on the integrity of Lough Gill SAC.

Lough Melvin SAC (000428) is located 6.4km downstream of the proposed wind farm site and hydrologically connected via the Lattone 35_010. As such, a hydrological pathway exists between the SAC and the proposed project. There is potential for adverse effects to QIs, specifically those which are sensitive to water quality, namely 3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoetes-Nanojuncetea; 1106 Salmon (*Salmo salar*); and 1355 Otter (*Lutra lutra*). A similar finding was found with regard to the first two QIs in the Lough Melvin SAC (NI).

Hydrological pathways exist to Lough Gill SAC, Lough Melvin SAC, Lough Melvin SAC (NI), Ballysadare Bay SAC/SPA, Cummeen Strand/Drumcliff Bay SAC/SPA, Donegal Bay SPA and Unshin River SAC. Without mitigation, sediment or accidental pollution could affect aquatic habitats, wetlands, salmon, lamprey species, otter, white-clawed crayfish and supporting habitats for waterbirds.

The NIS identifies European otter as a key species requiring protection, particularly along the Grid Connection Route and near certain Turbine Delivery Route locations. Potential impacts include disturbance from noise, lighting, vibration and human activity, as well as the possible presence of unidentified holts or couches. Bird disturbance risks are generally considered limited due to existing traffic disturbance, screening, separation distances and the short-term nature of works. Collision risk for Lesser Black-backed Gull and Herring Gull was assessed, but no functional link with Lough Derg SPA breeding populations was established.

The mitigation measures proposed have regard to the European Commission 2021 Guidance (EC, 2021) and the mitigation hierarchy more generally. The guidelines states that:

“The hierarchy of mitigation measures suggests first avoidance (i.e. preventing significant impacts from happening in the first place) and then reduction of impact (i.e. reducing the magnitude and/or likelihood of an impact)”.

In addition to accepted standard good practices, the proposed mitigation measures (summarised in Table 5.1 of the NIS) includes implementation of the Construction Environmental Management Plan, Surface Water Management Plan, Spoil and Peat Management Plan, SuDS drainage, interceptor drains, settlement ponds, silt fencing, no refuelling or stockpiling within 50m of watercourses, groundwater monitoring, buffers from karst features, spill kits and road sweeping. Other mitigation includes pre-construction surveys, exclusion zones, works restrictions near holts, NPWS consultation and derogation licensing where required.

The NIS also provides for an Invasive Species Management Plan to control Japanese Knotweed, Himalayan Balsam and Rhododendron during construction, operation and decommissioning. The in-combination assessment considered forestry, other wind farms, quarrying, flood relief works and wastewater treatment infrastructure and concluded that no adverse cumulative effects are anticipated with mitigation. Transboundary effects on Lough Melvin SAC (NI) were also assessed, and no residual effects are predicted.

The NIS concludes that following the application of the detailed mitigation measures, in view of best scientific knowledge, on the basis of objective information, it has been concluded that there is no potential for adverse effects on the identified Qualifying Interests and Special Conservation Interest species and their associated targets and attributes, or on overall site integrity, either alone or in combination with other plans or projects, in light of the conservation objectives of these European sites.

The impact assessment has considered all elements of the proposed project in full, inclusive of the Turbine Delivery Route and Grid Connection Route as well as the design flexibility in relation to turbine models. The in-combination effects assessment, concludes that the proposed project, either individually or cumulatively with other projects, is not anticipated to result in adverse effects on any of the identified European sites. The potential for transboundary effects has been assessed and, taking account of the proposed mitigation measures, no adverse effects on European sites within Northern Ireland or any other neighbouring jurisdictions are anticipated. In summary, there will be no adverse effects on the integrity of any European sites during the construction, operational and decommissioning phases of the proposed project, either alone or in-combination with any other plans or projects.

20.2 Assessment

The Planning Authority would agree with the conclusions of the Appropriate Assessment Screening Statement.

The Planning Authority would consider that the applicant has carried out sufficient and robust mammal and bird surveys in accordance with best practice and guidance to demonstrate that the development on the site would not have an adverse impact on the site integrity of the nearby sites within the Natura 2000 network.

The Planning Authority does not have an evidential basis to dispute the conclusions of the submitted NIS that following mitigation, the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the European sites. This conclusion is based on a complete assessment of all aspects of the proposed project, both alone and in combination with other plans and projects, and it has been established beyond scientific reasonable doubt that there will be no adverse effects. On the basis of the submitted NIS, the Planning Authority is satisfied that the proposed development, by itself or in

combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the sites' conservation objectives.

The report from the Environment Department concludes that An Coimisiún Pleanála should satisfy itself that adequate detail has been given, in terms of various method statements, design details yet to be provided in order to ensure a full Appropriate Assessment can be carried out by the Commission to determine if the development is likely to have direct, indirect or '*in combination*' impacts on the habitats and/or species for which the nearest Natura 2000 sites are designated.

The Planning Authority would concur with the view of the Environment Department that the Commission, as competent authority, is required to undertake a Habitats Directive assessment of the proposed project noting the employment of specialist ecologists by the Commission to assist in the undertaking of this task. Leitrim County Council has not employed an ecologist to assess the submitted NIS. The Planning Authority notes that there are no comments from the National Parks and Wildlife Service in the submission from the Development Applications Unit in relation to the conclusions of the submitted NIS.

Of significance to the consideration of the proposed development are the provisions of the Renewable Energy Directive (RED) III Directive from the EU. Broadly speaking, the Directive has taken a three-pronged approach to speed up permit granting for renewable energy projects by providing for an application '*completeness check*', prescribing mandatory permit granting timelines and including specific provisions which target environmental assessments. In EU planning law, IROPI stands for Imperative Reasons of Overriding Public Interest. Under the RED III, IROPI is a critical legal threshold. It allows renewable energy projects to proceed in designated protected areas (such as Natura 2000 sites) if the public benefit of the clean energy outweighs the environmental impacts. Article 16f requires that renewable energy plants be presumed as being in the overriding public interest for the purpose of appropriate assessment under the Habitats Directive. This was transposed into Irish law via the European Union (Planning and Development) (Renewable Energy) Regulations 2025. The Planning Authority is conscious aware therefore of the ability of the designers to compensate for adverse impacts which could not be mitigated against, relying on the IROPI provisions and address remaining residual adverse impacts through compensatory measures, similar to that proposed with respect to the hen harriers in the Ornithology chapter of the EIAR. The submitted NIS does not rely on such IROPI provisions which is duly noted by the Planning Authority.

21. Development Contributions

The Leitrim Development Contributions Scheme was adopted in 2023 and remains in effect. With regard to Wind Farm Developments, the scheme provides for the following:

Where tip height is <130m: €8,000 per MW subject to minimum of €20,000 per turbine.

Where tip height is >130m: €10,000 per MW subject to minimum of €25,000 per turbine.

In this instance, the tip height is well above 130 metres in height, so the latter provision is applicable. As the actual range of power to be generated by the proposed wind farm is not definite but rather within a range, the Planning Authority would request that the Commission include an appropriately worded condition in the event of permission being forthcoming that the development shall be subject to the provisions of the Leitrim Development Contributions Scheme (2023).

The Roads Department have not required a Special Development Contribution. The Planning Authority would request that a condition be included in the event of permission being forthcoming, following the undertaking

of a detailed pre and post construction condition survey of proposed haul routes, bridges/structures along the route, weight of abnormal loads, and arrangements for maintenance of routes/structures during construction and repair of any damage caused by the proposed development.

In addition, prior to commencement of development, the developer shall be required to lodge with the Planning Authority a cash deposit, a bond of an insurance company, or such other security as may be acceptable, to secure the reinstatement of public roads which may be damaged by the transport of materials to the site, coupled with an agreement empowering the Local Authority to apply such security or part thereof to the satisfactory reinstatement of the public road. The form and amount of the security shall be as agreed between the Planning Authority and the developer or, in default of agreement, shall be referred to An Coimisiún Pleanála for their determination. A similar requirement with regard to the decommissioning of the proposed development should be included.

22. Community Benefit Fund

The Planning Authority would request that the Commission, in the event of planning permission being forthcoming, would include a condition requiring the developer to adhere to the Community Benefit Fund As outlined in the application documentation submitted for the operational life of the wind farm. The fund shall be administered in accordance with the Renewable Electricity Support Scheme (RESS) Community Benefit Funds Good Practice Principles, 2021, prepared by the Department of the Environment, Climate and Communications.

23. Conclusions and Recommendations

The report prepared has outlined herein that there are a number of areas of considerable concerns for the Planning Authority with regard to the adequacy of the submitted documentation to the Commission which would allow for a positive decision to be made on the proposed Lissinagroagh Wind Farm. The Planning Authority had sought sight of the report which was undertaken by the Commission inspectorate with regard to the completeness check undertaken but no response to this request had been received from the Commission at the date this report was submitted to the Elected Members for their consideration (July 15th).

The identified shortcomings in the submitted application includes, inter alia, the following:

- The proposed development has not considered the full extent of the impact of the proposed development on the local road infrastructure in terms of assessing bridges and culverts along the construction and delivery routes to confirm their structural carrying capacity with particular concerns expressed in relation to the structural integrity of Leminea Bridge with regard to the proposed Turbine Delivery Route;
- The proposed Traffic and Transportation Assessment would appear to have failed to have considered the impact on the local roads network of the proposed turbine foundation pours scheduled to occur over a 14 day period consisting of 460 no. movements per day;
- The Road Safety Audit has not considered in full the delivery of Abnormal Indivisible Loads to the proposed development site as the Swept Path Analysis was not complete at that time it was prepared;
- Measures deemed necessary in the Road Safety Audit for Permanent Site Access Location 2 and for Permanent Site Access Location 5 & 6 have not been addressed, and both proposed entrances are considered to constitute traffic hazards;
- The proposed application does not include the full extent of works required to allow the wind farm to be constructed with reference to the temporary works required for the Turbine Delivery Route and the details of the proposed construction of an 860-metre access roadway at Cherrybrook are seriously lacking in detail;

- The impact of the proposed Borrow Pit related traffic or of forestry clearance related traffic on the local road network have not been assessed in the submitted Traffic and Transportation Assessment;
- The submitted Noise Impact Assessment does not appear to have considered the nearest noise sensitive locations of residential properties for all of the proposed turbines;
- There is no consideration in the submitted Air Quality Assessment of the effect arising from possible blasting activities on site (Borrow Pits) nor of the noise associated with such activities in the submitted Noise Impact Assessment;
- Concerns in relation to the submitted Peat Stability Risk Assessment with regard to proximity to recorded landslide events and scree falls close to a number of turbines, the extent of reliance placed on standard construction practices rather than on bespoke mitigation or control measures specific to the ground conditions of the relevant wind farm infrastructure elements, the deferral of critical aspects of peat stability management to post-consent stages of the project, and provision of comparatively limited analysis of the potential wider effects arising from cumulative excavation activities, peat excavation and storage, hydrological modification, drainage interventions, borrow pit operations and changes in groundwater conditions across the peatland system as a whole;
- The proposed design and siting of the turbines is not sufficiently cautionary and the EIA lacks sufficient evidence to support the efficacy of proposed mitigation measures during extreme dry and wet conditions as well as 'normal' conditions;
- Adequate consideration of the built heritage impacts of the Swept Path Analysis within Manorhamilton have not been undertaken in the chapter dealing with Archaeological, Architectural and Cultural Heritage;
- The waste assessment presented in the Material Assets chapter of the EIAR is not sufficiently detailed to demonstrate compliance with EPA guidance or to support the conclusion that waste impacts will be "*not significant*";
- The chapter dealing with Biodiversity within the EIAR raises a number of potential areas of concern / likely non-alignment with the County Leitrim Biodiversity Action Plan 2026-2031 to include direct footprint impacts on blanket bog; hydrological risk to high value catchments; fragmentation of ecological connectivity; species risk; over reliance on mitigation rather than avoidance and risk of spread of invasive species;
- The chapter dealing with Ornithology fails to address the concerns of the Biodiversity Officer and the Development Applications Unit of the Department of Housing, Local Government and Heritage with regard the impact of the proposed development on the hen harrier, an Annex I protected species under the EU Birds Directive and that the proposed development causes known habitat loss or functional displacement directly conflicting with national conservation policy, and;
- The siting of proposed turbines 03,13 and 14 would adversely impact on the considerable visual amenity of Dough Mountain, and of Dough Mountain when viewed from other upland receptors including the adjoining Thur Mountain; in so doing the proposed development fails to adhere to the policy framework contained in the County Development Plan 2023-2029 with regard to protecting areas of High Visual Amenity.

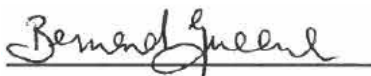
At a strategic level, Leitrim County Council clearly supports wind energy development as outlined in the policy support contained in our County Development Plan informed by our Renewable Energy Strategy and Climate Action Plan. Renewable energy projects are recognised as providing an opportunity to reduce our dependency on non-renewable resources for energy production and contribute to achieving a greater degree of energy security than is presently the case. However, that broad policy support does not necessarily render all renewable energy proposals acceptable. The development proposal presented, whilst comprehensive and voluminous, is lacking in sufficient detail and evidence to demonstrate to the satisfaction of the Planning Authority that the scale of the proposed wind farm can be accommodated at this location with regard to the proper planning and sustainable development of the area.

Having regard to all of the foregoing considerations, it is not considered that the proposed wind energy development can be endorsed by Leitrim County Council on the basis of the detail, analysis and justifications presented to date.

It is recommended to the Elected Members that this report and the concerns detailed herein, be endorsed as representing Leitrim County Council's consultation response, for issue to An Coimisiún Pleanála.

In addition to the foregoing, the report from the Environment Department highlights quite a significant number of inconsistencies between various aspects of the proposed development within individual chapters and between chapters. The report also outlines a series of concerns in relation to the adequacy of the submitted Construction and Environmental Management Plan in relation to, inter alia, incorrect categorisation of wastes, quantification of waste streams, inadequate detail on temporary waste storage and authorisation, hazardous waste procedures are generic in nature and that the decommissioning waste section is minimalist in nature. The report also outlines that a full Resource & Waste Management Plan (RWMP) is required for the proposed development and what such a plan should include.

Should the Commission decide to grant planning permission following the resolution of the above stated concerns, the Planning Authority would refer the Commission to the various suggested conditions contained in the reports prepared by the Environment Department, Roads Department and Emergency Services Department in their respective reports along with those also mentioned in the body of this report.



Bernard Greene

Senior Planner

Date: 14th July 2026



Mary Quinn

Deputy Chief Executive / Director of Services

Housing, Planning, Corporate Services and Transformation
and Carrick-on-Shannon Municipal District

Date: 14th July 2026

24. Addendum to Chief Executives Report

In his presentation to the Elected Members at the Special Council Meeting, the Senior Planner addressed an issue not included in the submitted report and outlined that an addition addendum in this regard would be included for completeness. Section 3 of the submitted report deals with the planning application site history and the applicant's history. The section dealt only with the planning application history in relation to the submitted application site. In previous consultations with the applicant's, the previous planning application for a wind farm further up the slopes of Dough Mountain was discussed and again mentioned in the response from the Planning Authority to the EIAR scoping request. I refer to the attached record, dated 18th December 2020, Appendix V. The record notes

The planning history associated with the previous proposal of 8 no. turbines at Dough Mountain was discussed (P09/260). It was indicated that the promoters of this development contacted the Planning Authority a number of years ago to explore the prospect of developing a wind farm on the adjoining Thur Mountain. Having considered the reasons for refusal and the quality of the previous application and EIS, the Planning Authority discouraged the proposal. Contact was made less than one month ago again trying to resurrect the proposal on Thur Mountain. Particular attention to the previous reasons for refusal for a considerably smaller development at this location should be taken by the promoters.

In the response to the request for scoping, dated 27th January 2025, the Planning Authority noted

In addition, please be advised that a proposed windfarm development was refused previously at Dough Mountain by An Bord Pleanála (ref. PL 12.234741 / LCC P09/260). The applicants were 'An Dough Windfarm limited' and the proposed development sought planning permission to erect a windfarm on a 140 hectare area close to the summit of Dough Mountain. The proposed development consisted of eight turbines, a transformer compound, an electrical control building, inter-turbine service roadways, eight hardstand areas and ancillary works such as underground electrical ducting, etc. Each turbine would have a three megawatt power rating. There will be a hardstand area at each turbine. The total power output capacity of the proposed windfarm was 24 megawatts. The turbines would be 80m in height and the rotor blades will be 45m each in length. An environmental impact statement formed part of the documentation required by this application.

Permission was refused by the Board for 2 no. stated reasons, the first of which is relevant in this context:

1) The site is located within the Dough/Thur Mountains Natural Heritage Area (number 2384) which comprises an extensive area of intact upland blanket bog in association with Dry and Wet Heath. Blanket Bog is listed in Annex I of the EU Habitats Directive 1992 and Active Blanket Bog is listed as a Priority Habitat. Having regard to the location of the proposed wind farm centrally within the proposed Natural Heritage Area near the summit of the hill, within an area of relatively intact bog, the depth of peat on the site, the slope of blanket bog and the wet nature of the bog, it is considered, on the basis of the information submitted with the planning application and the appeal, that the proposed development would pose an unacceptable risk of degradation of the priority habitat. Furthermore, the Board is not satisfied that the proposed development would not lead to surface pollution and risk of slope instability. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

The above reason shall be considered carefully in the preparation of the EIAR and the reason for refusal clearly addressed and mitigated.

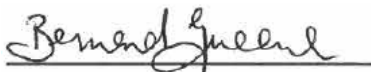
In section 16 of said scoping response in relation to Landscape and Visual Impact Assessment, the submission stated

As previously advised, the previous wind farm proposal at Dough Mountain was refused planning permission by An Bord Pleanála (ref. PL 12.234741 / LCC P09/260). The second reason for refusal was

2) The site is located in an elevated position on Dough Mountain, an area of high visual amenity within a designated scenic view as set out in the current development plan for the area. Having regard to the nature and extent of the proposed development close to the ridge line of the Mountain, which is a focal point for panoramic views over long and short distances, it is considered that the proposed development would constitute an unacceptable obtrusive feature on the landscape and would seriously injure the visual and recreational amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Having regard to the current proposal which proposes a turbine tip height of 185m, which is 2.3 times taller than the previous unsuccessful proposal and in the absence of knowledge of the exact location proposed for the windfarm and individual turbines, the EIAR shall be cognisant of the visual sensitivities of the area and demonstrate the likely impact of the proposal in the receiving landscape. The assessment shall also consider the landscape character and landscape sensitivity and relevant wind energy capacity studies which were published in the Leitrim County Development Plan 2023-2029. In this regard, the baseline shall consider landscapes within Co. Leitrim and adjoining counties together with designated landscapes, designated scenic routes and protected views and prospects.

Whilst the submitted planning application relates to an entirely different site, the section dealing with the planning application history should have referred to this previous application in the vicinity of the application site.



Bernard Greene

Senior Planner

Date: 21st July 2026



Appendix I Report from Road Design Department

Review of Strategic Infrastructure Development Application – Lissinagroagh Windfarm by Leitrim County Council Infrastructural Department:

NOTE: The following is a review of the above application from the roads department of Leitrim County Council (LCC). It will highlight concerns that the roads authority have with the proposal from an infrastructure point of view only. There are a number of private connections and haul routes, but this review will deal with public infrastructure only.

Application and Scope of SID:

Future Energy Ltd. have applied under the provisions of Strategic Infrastructure Development (SID) for a proposed windfarm development northeast of Manorhamilton to An Coimisiún Pleanála. The proposed windfarm consists of 14 no. wind turbines with a development boundary for infrastructure of 170.5 ha within an overall boundary of 389 ha including biodiversity enhancement lands. The wind turbines have a blade tip height range of 180m to 185m inclusive; a rotor diameter range from 149m to 163m inclusive, a hub height range from 101 m to 110.5 m inclusive, a minimum ground clearance of 22 m, and all associated foundations, hardstanding and assembly areas.

Construction Traffic Assessment and Management:

The proposed SID is accompanied by several maps which highlight the layout and access points to the elevated sites. The roads authority (LCC) has a number of public roads within the Dough Mountain region where the proposed 14 no. wind turbines are located (Tobin Drawing 10922-2070).

The access to the SID is shown to follow the N16 to Cherrybrook Td. 2.5km from the town of Manorhamilton. It then veers north on the local road L-6184-0 for 600m. The proposed haul route then enters private property and continues north. The proposed route then rejoins the L-6184-2/3 for approximately 2.2km. The SID then continues north along an existing private haul route. There is a small spur off this route along the L-61803-2 for 0.3km.

In total, we have 5km of public road network that will be affected by the SID construction traffic. However, the maps indicate a service entrance to wind turbine T11 and T12 which is on the western site of the Dough Mountain. We need clarification if the developers are proposing to use this as a haul route. It would be advantageous if we could minimise the damage to road network by ensuring that all construction traffic access the development from southern side along the N16.

Haulage along the L-6180-0 at Skreeny Td. Should not be permitted as this public road will not be able to survive platoons of HGV's and will require high investment to rectify any damage.

The section of public road between the L-6184-0 and the L-6184-2 is not indicated as a haul route, however, we will need clarification that the private connector haul route between these sections of public road will be constructed and used to minimise damage

The roads authority will seek clarification on how the SID developers will ensure that all they contractors and subcontracts will adhere to the N16 access only.

The roads authority has concerns on how the SID will strengthen the existing local road network that is proposed to carry the construction traffic as some of these local roads at less than 3m wide with no verge or verge supports.

There are a number of small culverts along the haul route that will need to be surveyed, however, there is only one stone arch bridge (Leminea Bridge) which crosses the Owenmore River. The roads Authority will seek clarification on how they intend to protect this 5.5M stone arch structure.

Quarry/Concrete haulage during construction should remain on the national and regional road networks where possible. It is identified within the SID development submission that the L-4135 will be used in quarry supplies. This will need to be clarified and a possible alternative route will need to be identified.

It is recommended that the TII are consulted as part of the overall submission. Although the roads authority maintain the national roads, the TII own the asset and will need consulting.

Construction of Junctions, Passing Bays and Borrow Pits.

The SID has provided drawings (Tobin drawings 10955-2071 to 10955-2090) of the proposed junction realignments, passing bays and borrow pits.

The junction realignments on the local road L-6184-0/2/3 are created to allow the large payload access to the mountainous areas. The roads authority requires clarification of the temporary status of these proposed junction layouts. Confirmation of the permanency and detail construction is needed to allow us to adjudicate this proposal. The SID submission mentions bollards and boundary fencing to re-establish the junctions once the development is complete.

Passing bays are a welcome addition to any local roads and will need to be established for the proposed development HGV traffic. Again, the roads authority will require information of permanence and construction details. While the road authority can discuss locations of passing bays etc., liaison and accommodation of landowners will be the developers responsibility.

The location of proposed Borrow Pits along the public road network will require a detail entrance arrangement and a decommissioning method statement.

Drainage:

Drainage along the local road network, which is identified within the SID application, relies on an open drainage network and therefore requires the road edge drain system to be maintained. There is a risk, with large amounts of HGV, that these open drains may be compacted or throttled resulting in excessive rainwater remaining on the road surface. The roads authority will need to know how this is either prevented or maintained.

Culvert at proposed junction widening will have to be designed to allow unimpeded flows.

The overall environmental issues associated with construction contamination of watercourses will be dealt with by LCC environmental department.

EIAR Comments:

16.1.1 has outlined the swept path assessment and has identified Park Lane in Manorhamilton. Again, the roads authority has concerns with access to the overall site from this location (see above). The auto track system has identified areas where actions must be taken for the delivery of the large turbines. The roads authority will require specific actions needed for any public realm alterations.

16.2.1 Traffic Management Plan needs to highlight all public roads that will be used for the construction of the proposed development. It is unclear whether access along the R-282 and L-6180-0 is required.

16.2.3 Junction detail designs will be required to assist in our review of the proposed development. The EIAR has identified junction 4 and 3 along Park Road Manorhamilton, which is a concern for the road's authority.

16.3.2.2 The local road L-6180-1 is described as having a 4m wide carriageway. This is not the case

16.8.2.4 AIL deliveries will require temporary accommodation to allow components to be delivered to site. We need clarification on what duration will these temporary works be in place and any remedial works to restore to original layout.

16.8.2.5 Grid connection route has not been identified in this submission and will require a large amount of information to allow proper governance with respect to road opening licencing or section 254 licencing.

16.9.2.4 Clarification is needed to identify how the developer has addressed the Stage 1 Road Safety Audit.

16.9.2.6 This section has mentioned trench reinstatement. The roads authority will need clarification where road trenches are being constructed. It is not clear from SID application.

Reparation of Public Road Network:

Due to the nature of this proposed development, excessive wear and tear of the public network, however curtailed, will occur.

The roads authority has a PSCI which identifies and surveys the public network on a 2-year rotational system and thus have an up-to-date survey of the asset. The roads authority will be seeking a detailed plan of action for the following:

- Upkeep of public road network during the development.
- Maintaining the public road network to allow safe and unimpeded access to private dwellings.
- Reinstatement of public network to its original condition once the development is completed.



Darragh O'Boyle, C. Eng.

Senior Engineer

Leitrim County Council Sustainable Transport



Appendix II Report from Environment Department

Lissinagroagh Windfarm SID Application - Internal Referral Response

Environment Section

The applicant has sought permission from An Coimisiún Pleanála under the Strategic Infrastructure Development provisions. The proposed development is described above under Proposed Development. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in relation to the project and accompanies this planning application.

The following are a collation of all Environment Responses of the EIAR and the Construction Environmental Management Plan (CEMP):

EIAR

Chapter 3 Reasonable Alternatives - Environment Response:

1. Inconsistent MW Output for the Final 14-Turbine Layout

The chapter gives different output ranges for the proposed project:

- The future baseline section states the proposed project has a power output ranging from **77–110.8 MW**.
- Table 3-3 states the final 14-turbine layout has a potential output of **77–100.8 MW**.

This requires clarification.

2. Grid Connection Lengths Are Inconsistent

The chapter variously describes the grid connection as:

- approximately **32 km** from the onsite substation to Srananagh substation;
- **30.6 km** within the public road corridor; and
- **UGC Route Option 1** as **33.5 km**, which is the option being carried forward.

This requires clarification.

3. Alternative TDR Assessment May Need Supporting Lengths

The turbine delivery route assessment states that alternative TDR options are considerably longer than the chosen route and that the chosen TDR is the shortest by approximately **9 km**. However, the chapter does not clearly set out the lengths of each alternative route in the comparison table.

The table should include the approximate length of each alternative TDR option, the number of pinch points and the extent of accommodation works required.

Chapter 4 Population and Human Health - Environment Response:

1. Inconsistent setback/buffer wording

The chapter identifies:

1. a closest sensitive receptor approximately **763 m** from turbine T14;
2. a second closest sensitive receptor approximately **784 m** from turbine T3;
3. a Draft 2019 WEDG setback requirement of **740 m**, based on 4 times the 185 m tip height;
4. a proposed **minimum 750 m buffer** from turbines to sensitive receptors;
5. elsewhere, a minimum setback of **740 m**.

Comment: This needs clarification. If the applicant is committing to a **750 m minimum buffer**, all references should consistently state this. If the actual design commitment is only **740 m**, the references to a 750 m buffer could be misleading.

2. Typographical error regarding distance to residential receptor

Section 4.4.2.1.3 states that access road works will take place at a minimum distance of “**c. 250m**” from the nearest residential building. Later in the same section, upgrade works at the L6184 site entrance are stated to be located **c. 25 m** from the closest residential building.

Comment: This requires correction. The difference between **25 m** and **250 m** is material in terms of residential amenity, construction noise, dust and traffic disturbance.

3. Wind farm/site area figures are unclear

The chapter states that the proposed wind farm has an area of approximately **231 ha**. Later, it states that the total site area is **389 ha**, of which **170.5 ha is the proposed wind farm**.

Comment: These figures may relate to different boundaries, e.g. application boundary, wind farm lands, infrastructure footprint or developable area. However, this is not clearly explained in the chapter and could give rise to confusion or perceived inconsistency.

Chapter 5 Biodiversity - Environment Response - Comments from Biodiversity Officer, Leitrim County Council:

The County Leitrim Biodiversity Action Plan 2026 – 2031 sets out a strategic framework to protect, restore and enhance biodiversity across the county, recognising its importance for ecological resilience, climate action and community wellbeing. The Plan adopts a partnership approach involving the local authority, communities and stakeholders, and is guided by national and EU biodiversity policy. It prioritises the conservation of priority habitats such as peatlands, wetlands and upland landscapes, the protection of species of conservation concern, and the strengthening

of ecological networks and water quality, while promoting biodiversity awareness and integrating nature into land-use planning and development management.

<https://www.leitrim.ie/council/services/biodiversity/county-leitrim-biodiversity-action-plan/>

The EIAR raises the following key potential areas of concern / likely non-alignment with the County Leitrim Biodiversity Action Plan (BAP):

(i) Peatland Loss & Degradation Risk

Leitrim BAP strongly prioritises protection, restoration, and avoidance of further damage to peatlands, especially Annex I blanket bog.

Concerns:

The project includes direct footprint impacts on blanket bog (PB2) including:

- Active blanket bog (Annex I priority habitat)
- Additional inactive/degraded bog with restoration potential

Even with micro-siting, the scheme still involves turbines, tracks, borrow pits and drainage within peatland areas.

Cutover bog recognised as degraded but with restoration potential. However, emphasis is on impact management, not net restoration gain. No clear commitment to peatland restoration at meaningful scale or long-term biodiversity net gain. Loss/fragmentation of peatland could undermine county-scale restoration objectives.

(ii) High Sensitivity of SAC Linkages (especially Lough Gill)

Leitrim BAP strongly supports Natura 2000 network protection beyond minimum compliance.

Concerns:

Lough Gill SAC is only 165 m from wind farm and direct overlap by Grid Connection Route (GCR) on multiple pathways: hydrological, hydrogeological and ecological

Other SACs are linked via groundwater (karst systems) and mobile species (otter, salmon)

The density of pathways and proximity presents a high cumulative risk profile.

(iii) Hydrological Risk to High-Value Catchments

Leitrim BAP prioritises water quality protection and safeguarding SAC-linked river systems (e.g. Lough Gill, Melvin). Leitrim BAP aims to improve water status, not just maintain status.

Concerns:

Extensive hydrological connectivity:

22 river waterbodies + 3 lakes + estuarine systems

Direct links to highly sensitive SACs, especially Lough Gill SAC. Some downstream receptors are already at Moderate or Poor WFD status. EIAR relies heavily on construction-phase mitigation assumptions, which are difficult to enforce long-term risk-based rather than impact-avoiding

(iv) Fragmentation of Ecological Connectivity

Leitrim BAP typically emphasises landscape connectivity (hedgerows, wetlands, peatland mosaics).

Concerns:

Infrastructure footprint includes tracks, grid connection, Turbine Delivery Route (TDR) works which will affect hedgerows, treelines, scrubland and peatland-heath mosaics. Linear features are acknowledged as important in the EIAR but are still subject to removal/alteration in places.

Incremental fragmentation of habitats could undermine species movement (e.g. bats, otter, marsh fritillary.)

(v) Over-Reliance on Mitigation vs Avoidance

The Leitrim BAP aligns with precautionary principle and avoidance hierarchy, especially for Annex I habitats and SAC pathways and would favour design-led avoidance of sensitive systems entirely.

Concerns:

For multiple impacts (peatland, water, species) the EIAR concludes “no adverse effects after mitigation”

There is heavy reliance on buffer zones, construction controls and good practice measures. This approach may be seen as optimistic / compliance-led rather than ecological-led. The EIAR references compensation and enhancement lands but there is no clear indication of measurable net biodiversity gain.

(vi) Species Risk – Particularly Marsh Fritillary & Aquatic Species

The Leitrim BAP highlights safeguarding of pollinators, freshwater species and Annex II species.

Concerns:

There are records of Marsh fritillary (Annex II species) along site boundary.

In addition there are aquatic species at risk: salmon, lamprey, eel, white-clawed crayfish. Potential impacts primarily controlled via timing, buffers and mitigation.

(vii) Invasive Species – Risk of Spread via Construction

Invasive species management is a key BAP action area.

Concerns:

EIAR states existing presence of Japanese knotweed, rhododendron, balsam and American mink. Extensive earthworks and movement of material increase spread risk across catchments. The EIAR sets out that invasive species management will be addressed through a dedicated Invasive Species Management Plan (ISMP). However, the plan focuses mainly on preventing spread, rather than eradication or long-term control and relies heavily on contractor biosecurity compliance during construction.

Chapter 6 Ornithology - Environment Response - Comments from Biodiversity Officer, Leitrim County Council:

The County Leitrim Biodiversity Action Plan 2026 – 2031 sets out a strategic framework to protect, restore and enhance biodiversity across the county, recognising its importance for ecological resilience, climate action and community wellbeing. The Plan adopts a partnership approach involving the local authority, communities and stakeholders, and is guided by national and EU biodiversity policy. It prioritises the conservation of priority habitats such as peatlands, wetlands and upland landscapes, the protection of species of conservation concern, and the strengthening of ecological networks and water quality, while promoting biodiversity awareness and integrating nature into land-use planning and development management.

<https://www.leitrim.ie/council/services/biodiversity/county-leitrim-biodiversity-action-plan/>

The EIAR raises the following key potential areas of concern / likely non-alignment with the County Leitrim Biodiversity Action Plan (BAP):

This chapter raises significant concerns on ornithological grounds, specifically in relation to hen harrier (*Circus cyaneus*) and its supporting habitat. Hen harrier is a species of high conservation concern, listed on Annex I of the EU Birds Directive, and is a priority species under national biodiversity policy and the County Leitrim Biodiversity Action Plan.

(i) Significant Impact on Hen Harrier

Hen harrier is an Annex I species under the EU Birds Directive, requiring strict protection of breeding sites and maintenance of sufficient habitat area and quality.

The Hen Harrier Threat Response Plan (2024–2028) recognises that the species has declined significantly and may face extinction risk without intervention. Irish objectives are to “cease, avoid, reverse, reduce or prevent threats” to the species and its habitats.

Protection of Hen Harrier strongly aligns with Leitrim BAP objectives (upland biodiversity, raptor protection, habitat management).

Concerns

The site overlaps Leitrim Uplands which are a nationally important breeding area for Hen Harrier. 1–2 breeding pairs have been recorded on/adjacent to site annually.

The EIAR acknowledges a significant impact before compensation and predicts up to 140 ha functional habitat loss for Hen Harrier, which is a significant, long-term negative impact at national scale (pre-compensation). Site selection does not avoid core Hen Harrier territory. Development that causes known habitat loss or functional displacement directly conflicts with national conservation policy.

(ii) Reliance on Compensation Rather Than Avoidance

Leitrim BAP emphasises avoidance of impacts on key species first and enhancement as net gain, not trade-off. The BAP aims to strengthen existing populations, not relocate or offset them.

Concerns:

Significant hen harrier impact is not avoided and instead is offset by compensation measures. However, compensation may not replicate functional habitat loss in the same ecological context. These measures offer a biodiversity trade off rather than protection. Compensation cannot fully replace lost or disrupted functioning territories.

(iii) Development in a Key Upland Bird Area

Leitrim BAP strongly supports protection of upland habitat and maintenance of open peatland/heath bird assemblages. EU guidance for wind farm development is clear and they must avoid impacts on protected species and Natura networks. Bird sensitivity mapping in Ireland was specifically developed to prevent inappropriate siting in key bird areas [birdwatchireland.ie]

Concerns:

The site is located within an important non-designated upland breeding landscape. There are sensitive bird species present e.g. hen harrier, snipe, woodcock and red grouse. Sensitive breeding landscapes should be avoided, not mitigated.

(iv) Disturbance & Displacement Effects During Construction and Operation

The Leitrim BAP emphasises not just habitat retention but functional use of land by species and protection of viable breeding territories.

Concerns:

Disturbance during construction as well as operational turbines can cause displacement of breeding and foraging birds which leads to effective habitat loss. The EIAR states that territory disruption is accepted and compensated.

(v) Underestimation of Importance of Non-Designated Areas

The Leitrim BAP places strong value on locally important biodiversity areas and ecological networks. Farmland birds and other passerines are in serious decline and also need protection. The County Leitrim Biodiversity Action Plan emphasises the protection of upland habitats, the

conservation of birds of prey and declining bird species and maintaining ecological integrity and connectivity of key landscapes.

Concerns:

The EIAR recognises the upland area as important but relies on designation-driven protection and underplays local biodiversity value outside of the Natura 2000 sites. The EIAR explicitly does not treat passerines as primary targets and does not refer to passerine conservation priorities (BoCCI red/amber list).

(vi) Displacement and Habitat Loss

The project is in an active hen harrier landscape, leading to acknowledged significant impacts that are managed through compensation rather than avoided. Functional loss of breeding/foraging habitat will have a real ecological impact.

Concerns:

The EIAR concludes that there is no significant collision risk for all species based on modelling assumptions. However, surveys in the vicinity have recorded high-sensitivity species e.g. hen harrier, whooper swan and white-tailed eagle.

For raptors, displacement and habitat change are often more important than collision. Key findings from the UCC WINDHARRIER project show that prey availability (small birds) decreased near turbines, especially within ~100 m. This directly affects foraging success, which is critical for breeding success. Reduced prey leads to reduced territory quality and eventual territory abandonment. This is functional habitat loss, even without direct mortality.

(vii) Cumulative Effects Possibly Underplayed

Leitrim has a growing wind energy footprint in addition to sensitive upland bird populations.

Concerns:

The Hen Harrier Threat Response Plan explicitly recognises wind energy development as a pressure affecting hen harrier populations. Wind development is listed alongside forestry and agriculture. Hen harrier populations are already small (~108–157 breeding pairs nationally) and are declining and spatially restricted. Even moderate additional pressures (e.g. local displacement from wind farms) can be significant at population level.

The EIAR finds that there no significant cumulative effects despite multiple nearby wind farms and commercial forestry nearby.

There is clear scientific and policy evidence that hen harriers require large, undisturbed upland habitats, and that wind farm development can reduce habitat quality, prey availability, and territory function. National policy explicitly seeks to avoid threats and restore habitats. Locating wind turbines within an active breeding landscape—where significant habitat loss and displacement are

predicted—conflicts with both the precautionary principle and the objectives of the Hen Harrier Threat Response Plan and County Leitrim Biodiversity Action Plan.

Chapter 7 Land, Soils and Geology - Environment Response:

1. Temporary Waste Storage

Observations

Chapter 7 states that surplus excavated bitmac material will be brought to a recycling facility for processing and that all waste generated on site will be segregated and removed by licensed waste hauliers to appropriate facilities. It also notes that bitmac and similar materials will be dealt with under a circular-economy approach.

However, the chapter does not clearly say whether excavated road planings / tarmac will be temporarily stockpiled on site, and, if they are, under what waste authorisation or transfer arrangements that would occur. In other words, the chapter covers final off-site disposal/recycling, but it does not expressly address the legal basis for any interim storage or handling before removal.

Comment

Any temporary on-site storage of waste, including excavated bitmac/tarmac, spoil or construction waste, shall occur only in designated areas and in accordance with waste legislation and any required waste authorisation.

2. Excavated Peat and Spoil

Comment

Excavated peat and spoil shall be managed strictly in accordance with the Spoil and Peat Management Plan and deposited only in approved areas under geotechnical supervision.

3. Hazardous Waste

Provide a hazardous waste protocol including:

- identification of hazardous waste streams,
- bunded storage arrangements,
- spill kit waste procedures,
- licensed receiving facilities,
- transport and tracking arrangements.

4. Decommissioning Waste

Observation

Decommissioning waste is not assessed.

Comment

A Decommissioning Waste Plan shall be submitted for agreement at least 12 months prior to decommissioning, detailing all waste streams, including turbine blades.

5. Record keeping

Comment

The developer shall maintain records of all waste movements (quantities, EWC codes, collectors, receiving facilities) and make them available for inspection.

6. Peat Excavation

Excavation activities can have the effect of dewatering the bogland and its surrounding areas causing the water table to drop.

The Environment Section is concerned that this presents a high risk of catastrophic peat slope failure if the mitigation measures outlined in chapter 19 and the CEMP are not prioritised.

Chapter 8 Hydrology and Hydrogeology - Environment Response:

1. Provide a Method Statement for the clear-felling activities which includes detailed reference to the timing of the works, the various approval stages including those from Inland Fisheries Ireland and the surface water drainage plan. Include specific details of the surface water monitoring to be carried out during the clear-felling, the chemical, physical and biological monitoring proposed, identify responsibilities for this work. Please be specific as split-sampling of monitoring samples may be required by the Environment Section in interests of water protection. It is recommended that this sampling should be continued for the duration of the clear felling and construction works.
2. Clarify, if it is proposed to incorporate a 50m buffer zone during the wind turbine construction phase for all streams. Can further detail be provided as to how these zones will be delineated, installed and managed within the site.
3. Propose locations and submit a map where continuous monitoring equipment to monitor flow, turbidity and depth should be installed and remain insitu in the sampling locations on the Killanummery River_010, the Arigna River_010 and the Owengar River _010.
4. Clarify if silt fences will be installed on all the treated water outlets on all the proposed collector drains.

Chapter 9 Noise and Vibration - Environment Response:

- Clarify by providing a clearly labelled map to show each of the noise sensitive locations, noise measurement locations. The elevation of each location, the distance in metres from the wind turbine site boundary and the distance to the nearest turbine(s) should be clearly provided.
- Clarify with regard to the Noise Monitoring Locations Map (Figure 9-2) NML-10, NML-2, NML-4 and NML-5 were not located between the nearest proposed turbine and the nearest dwelling that would be considered the Nearest Sensitive Receptor. Also from the map it appears there is a dwelling West of Turbines T11 and T12 which the noise monitoring assessment did not take into consideration.
- Clarify if piling, explosives or blasting are required; such activities could void noise modelling and require remodelling.
- Prior to the commissioning of the wind farm, the operator shall submit a Noise Compliance Monitoring Programme (NCMP) to the planning authority for written agreement. The NCMP will include a detailed methodology for all noise measurements, including frequency or monitoring procedures for recording results and a protocol for managing complaints.
- A full noise survey shall be submitted to the Local Authority within six months of the wind farm being commissioned in order to verify noise conditions applied to this development.
- Following commission the following noise limits should apply:
 1. 40 dB $L_{A90,10min}$ for daytime in quiet environments with background noise below 30 dB $L_{A90,10min}$;
 2. 45 dB $L_{A90,10min}$ for daytime in other environments or 5 dB above background noise, whichever is higher,
 3. 43 dB $L_{A90,10min}$ during night-time periods. These criteria were assigned to representative receptors based on the measured background noise curves.
- Where a noise problem persists at any affected property that additional environmental noise monitoring should be carried out at the Wind Farm operator's expense. The Wind Farm operator is required to liaise directly with the affected parties, the affected members of the community and communicate with all affected parties and should appoint an independent noise monitoring consultant to conduct noise monitoring or other environmental monitoring as required at the site for the lifetime of the project and be required to implement all the actions of the relevant independent consultant.

Noise Complaints During Operational Stage:

- It is recommended and should be mandatory in the planning conditions in any grant of planning permission for the proposed Wind Farm that where a noise problem persists at any affected property that additional environmental noise monitoring should be carried out at the Wind Farm operator's expense.
- The Wind Farm operator should be required to liaise directly with the affected parties, the affected members of the community and communicate with all affected parties and should appoint an independent noise monitoring consultant to conduct noise monitoring or other environmental monitoring as required at the site for the lifetime of the project and be required to implement all the actions of the relevant independent consultant which may include "switching off" the affected noise/nuisance source if no other satisfactory, practical solution can be agreed; and all of this will be at the Wind Farm operator's expense.

Chapter 10 Shadow Flicker - Environment Response:

Where a shadow flicker problem persists at an effected property and following the monitoring of agreed screening measures, the effectiveness of the measures are not functioning to the satisfaction of the property owner/occupant, the turbines creating the issue must be included in the Turbine Shutdown Scheme.

Chapter 12 Climate - Environment Response:

1. Alignment with Leitrim County Council Climate Action Plan 2024-2029

This proposed windfarm generally aligns with LCC Climate Action Plan's objectives to reduce greenhouse gas emissions, support renewable energy deployment, enhance climate resilience, and promote resource efficiency. The proposed wind farm is presented as contributing positively to national renewable electricity and emissions reduction targets, and Chapter 12 expressly acknowledges the relevant local climate policy context.

2. Annualised Construction Emissions Are Used Inconsistently

The chapter states total construction phase GHG emissions of **13,530 tCO₂e**. Annualised over the stated 35-year project lifespan, this equates to approximately **387 tCO₂e per annum**.

However, Table 12-10 uses **566 tCO₂e** as the "annualised GHG emissions due to construction phase".

Please clarify.

3. "No GHG Emissions from Operation"

The chapter states that there will be **no greenhouse gas emissions from the operation of the wind turbines**. It later scopes out operational vehicle emissions due to the low volume of maintenance traffic.

Strictly speaking, the operation of the turbines themselves may not generate direct combustion emissions, but the operational phase may still involve minor emissions from maintenance vehicles, replacement parts, servicing, and ancillary activities.

4. Decommissioning Emissions Are Scoped Out but Still Relevant

The chapter states that decommissioning emissions are scoped out because they are expected to be a small proportion of total GHG emissions and are partly considered in turbine lifecycle assessments.

This is not necessarily incorrect, but given the scale of the development, decommissioning should at least be clearly addressed through a qualitative commitment to resource recovery, recycling, waste management and responsible disposal. The chapter does refer to recycling of metal components, but the approach could be strengthened.

This chapter should confirm that a decommissioning-stage resource/waste management plan will be prepared and that reuse/recycling principles will be applied in accordance with circular economy objectives.

Chapter 13 Landscape and Visual – Environment Response:

1. Cumulative wind farm count/status inconsistency

The chapter first states that the study area contains **six operational wind farms, two consented wind farms and one wind farm in planning**. Table 13-11 supports that description, listing six operational, two consented and one in planning.

However, the text later states that the study area comprises **six operational and three consented wind farm developments**, which conflicts with Table 13-11 because Croagh Wind Farm is listed as **In Planning**, not consented.

Please clarify

2. Cumulative ZTV description may not align with the developments included

The cumulative assessment says the ZTV relates to **existing and consented wind farms**. However, Table 13-11 also includes Croagh Wind Farm as **In Planning**.

The chapter should clarify whether Croagh was included in the cumulative ZTV and assessment.

Chapter 14 Archaeological, Architectural and Cultural Heritage - Environment Response:

1. Inconsistent Counts of Archaeological Sites

The chapter gives different totals for archaeological sites within the 5km study area. In Section 14.3.1 it states there are **“a further 122 archaeological sites... within the 5km study area... 8 of which include redundant records”**, whereas Section 14.3.4.1 later states there are **“a further 119 archaeological sites... seven of which include redundant records.”**

Please clarify

2. Cultural Heritage Sites Within the Footprint — Internal Conflict

Section 14.3.8 states that **14 cultural heritage sites are within the footprint of proposed works associated with the proposed wind farm site**, but the list includes **CH50, CH67, CH69, CH74 and CH76**, which are associated with the TDR/GCR rather than the wind farm site itself.

Please clarify

3. “No Predicted Effects” Conflicts with Later Direct Effects

Section 14.4.2 lists **CH66–CH75** among receptors for which **no predicted direct or indirect effects** are identified. However, Section 14.4.3 later identifies a direct effect on **CH74, Leminea Bridge**, where a c.20m length of bridge wall may be lowered to accommodate turbine oversail.

Please clarify

Chapter 15 Material Assets - Environment Response:

Summary of Review

The waste assessment presented in Chapter 15 of the EIAR is not sufficiently detailed to demonstrate compliance with EPA guidance or to support the conclusion that waste impacts will be “not significant”. The chapter provides only high-level estimates and does not include the level of quantification, waste-stream analysis, or mitigation detail expected for a project of this scale.

1. Insufficient Waste Quantification

- Construction waste is presented as a single municipal waste figure (61,500 kg) with no breakdown by waste type.
- No quantification of construction and demolition (C&D) waste, including timber, metals, plastics, concrete washout, cable offcuts, turbine packaging, or hazardous waste.
- Operational waste quantities are similarly high-level and lack waste-stream detail.

2. Absence of RWMP-Aligned Structure

Chapter 15 does not reflect RWMP content. Missing elements include:

- Waste hierarchy application
- Design-stage waste prevention
- Detailed waste stream identification
- Reuse/recycling targets
- End-destination facilities and capacity assessment
- Waste tracking and record-keeping arrangements

3. Hazardous Waste Not Addressed

The chapter does not identify or assess:

- Oils, lubricants, hydraulic fluids
- Spill kit residues
- Transformer-related waste
- Hazardous waste arising during decommissioning

4. Decommissioning Waste Omitted

There is no assessment of:

- Turbine dismantling waste volumes
- Foundation removal waste
- Cable recovery waste
- Turbine blade end-of-life management

5. Receiving Facility Assessment Absent

The EIAR identifies nearest EPA waste licenced sites but does not:

- Confirm acceptance of specific waste types

-
- Assess facility capacity
 - Consider regional constraints
 - Provide contingency arrangements

6. Mitigation Measures Generic

Mitigation is limited to segregation and use of permitted collectors.

Missing:

- Waste prevention measures
- Hazardous waste storage protocols
- Spill response procedures
- RWMP implementation and monitoring

The conclusion that wastes impacts are “not significant” is not evidence-based due to:

- Lack of detailed quantification
- Lack of waste-stream analysis
- No assessment of receiving facility capacity
- No cumulative impact consideration

Required Actions

To meet EPA and local authority expectations, the applicant should be required to provide:

1. A full RWMP-aligned waste assessment, including detailed waste stream identification and quantification.
2. A breakdown of all construction, operational and decommissioning waste types, including hazardous waste.
3. Identification of permitted waste collectors and licensed receiving facilities, with confirmation of acceptance and capacity.
4. A commitment to prepare and implement a full RWMP prior to commencement of construction.

Chapter 16 Traffic and Transport - Environment Response:

1. Peak HGV Traffic Figures Are Inconsistent

There is a significant inconsistency between the narrative and the traffic generation tables. The text states that peak construction traffic is estimated at 43 HV one-way movements per day / 86 two-way trips, but Table 16-7 and Table 16-10 use a peak of 29 HGV one-way movements / 58 two-way trips. This is a material discrepancy because the subsequent traffic impact assessment appears to be based on the lower figure of 29 rather than 43.

Please clarify

2. Concrete Pour Traffic Impact Needs Further Clarification

The chapter states that each turbine foundation pour will generate 230 HVs arriving onsite per day, equating to approximately 19 HVs per hour, and concludes that this is lower than the assessed peak-hour construction traffic of 68 two-way trips. However, if 230 HV arrivals occur in one day, the total two-way daily movement could be very substantial, and it is not entirely clear how this daily impact has been assessed against local road capacity, resident disruption, school-time restrictions, and the proposed HGV peak-hour restrictions.

The applicant should clarify the concrete pour traffic assumptions, including whether 230 HVs refers to arrivals only, total vehicles, or two-way movements, and how this interacts with the proposed restriction on HGV movements during peak network hours.

3. Junction 4 Naming / Description Is Inconsistent

Junction 4 is described in different ways throughout the chapter. It is referred to as "R282 Castle View / Park Road / N16 Sligo Road" in one section, but elsewhere as "Cluain Oir / Castle View / R282 Park Road". This creates uncertainty as to the exact junction being assessed and modelled.

Please clarify

4. Grid Connection Watercourse Crossings Contradiction

The grid connection section states that the GCR includes "sixteen (11) watercourse crossings", which is an obvious internal contradiction.

Please clarify

5. Bridge and Culvert Structural Capacity Not Clearly Addressed

Leitrim County Council and TII both raised the need to assess bridges and culverts along construction and delivery routes, including confirmation of structural carrying capacity. While this requirement is acknowledged in the consultation summary, a clear section in the chapter providing the results of such structural assessments could not be identified.

The chapter should either include a summary of bridge/culvert capacity findings or clearly cross-reference the relevant appendix/drawing/report where this assessment is provided.

6. Legal Status of Non-Public Roads Not Clearly Resolved

Leitrim County Council noted that certain areas highlighted on submitted drawings appeared to be non-public roads, and that their legal status and accessibility should be verified. The chapter acknowledges this consultation point, but it is not clear if this matter has been resolved.

The applicant should confirm the legal status and access rights for any non-public roads included in haul routes, site access arrangements, or turbine delivery arrangements.

Chapter 19 Summary of Mitigation Measures - Environment Response:

1. Schedule of Mitigation Measures: Clarify with regard to each of the proposed Mitigation Measures MM2, MM4, MM8, MM10, MM37, MM39, MM47, MM56, MM58 inclusive who will be the responsible personnel. (MM2: Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage) (PSCS), MM4: Ecological Clerk of Works, MM8 and MM10: Suitably Qualified Ecologist, MM37: Geotechnical Risk Engineer, MM39: Environmental Manager, MM47: Site Manager, MM56: Suitably Qualified Archaeologist, MM58: Competent Traffic Management Coordinator
2. Schedule of Mitigation Measures: Submit a Mitigation Measure for Post – Construction Surface Water Monitoring, this will be required by the local authority to be carried out after the construction works are completed and should be continued until the surface water monitoring results of the chemical and biological monitoring indicate that there is no adverse impact on the surface water rivers draining the site. The timing of the survey, the sampling required will be agreed with the local authority to ensure that all rivers and surface water quality are not impacted.
3. Schedule of Mitigation Measures: Please provide full details of an environmental complaint handling procedure for all stages of the project.

CEMP

CEMP Environment Response:

The CEMP contains operational procedures for handling materials, concrete, hydrocarbons and general waste.

Observation

The CEMP lists “common wastes” and “hazardous wastes” but does not assign European Waste Catalogue (EWC) codes.

This is a regulatory requirement under:

- Waste Management Act 1996
- Waste Collection Permit Regulations
- EPA RWMP Guidelines

Comment

The CEMP cannot function as a compliant RWMP with EWC coding.

Observation

The CEMP does not quantify bitmac/tarmac planning, concrete washout volumes, timber waste, cable offcuts, packaging waste and hazardous waste.

Comment

Authorisation needs and suitability of a receiving facility cannot be accessed without the quantification of waste streams.

Observations

No detail on temporary waste storage or authorisation.

The CEMP states that waste will be segregated and stored in designated areas before transport to licensed/permitted facilities, that waste hauliers will require collection permits, and that waste movements will comply with relevant regulations. It does not expressly state whether temporary on-site waste storage requires a waste permit or exemption. This should be clarified by the applicant/contractor in the final CEMP.

Hazardous waste procedures are generic and lack receiving facility detail

The CEMP states that contaminated material from oil leaks/spills will be removed from the area and disposed of at a licensed facility, and that a detailed spill response and control procedure will be developed in the Contractor's CEMP. However, it does not include a standalone RAMS for removal, classification, temporary storage, transport and disposal of contaminated material. This should be added.

Decommissioning waste section is minimal and lacks turbine blade/cable waste assessment.

Comment

Resource & Waste Management Plan (RWMP)

A full Resource & Waste Management Plan (RWMP) is required for the proposed development. The RWMP shall be prepared in accordance with EPA RWMP Guidelines (2021) and shall include:

- Full identification of all waste streams (construction, excavation, operational, and decommissioning).
- EWC codes for each waste type.
- Estimated quantities (tonnes/m³) of each waste stream.
- Proposed management routes (reuse, recycling, recovery, disposal).
- Identification of permitted waste collectors and licensed receiving facilities.
- Waste tracking and record-keeping procedures.

CEMP Specific Observations - Water

1. Dewatering Measures are generic and not site specific. Within the CEMP please provide detailed site specific dewatering methodologies for each turbine and borrow pit.
2. Borrow pit and turbine excavation dewatering should explicitly detail silt and turbidity management strategies. (The CEMP does not provide borrow-pit-specific or turbine-excavation-specific turbidity thresholds, treatment trains, settlement sizing or emergency response triggers.)
3. CEMP does not provide specifications for silt fencing or settlement tanks sized to relevant drainage/dewatering areas.
4. Spill kits may be ineffective on unsealed pavement; alternatives needed to protect streams.
5. How will constructed swales/open drains along access roads and hardstands be secured from erosion, especially on steep ground?
6. Aquatic buffer zones should be clearly marked before works.
7. Buffer zones and methodology to install/manage them should be included in the CEMP.
8. Clarify discharge of silt-laden runoff and clean water near streams or within buffer zones.
9. Provide RAMS for removal of contaminated material after hydrocarbon spill.
10. Concrete lagoon details conflict with references to bins/skips versus lined lagoons.
11. Confirm system and how excessive truck volumes will be managed during large concrete pours.
12. Borrow pit reinstatement should detail compaction methodology and chemical compatibility of placed soils.

13. Final CEMP should fully detail HDD mitigation and bentonite slurry reclamation/disposal.
14. Soil movements along the TDR are not understood; soils should be retained within field of origin or disposed as clean waste if appropriate.
15. Refuelling details are not site-specific and no hardstanding/interceptor is identified.
16. Reliance on drip trays and good practice; applicant should discuss options to address omission.
17. Mobile plant should be refuelled at a refuelling hub where possible; large plant refuelled at workplace by trained operator or fuel delivery agent under supervision.
18. Include elaborate site-specific RAMS for refuelling activities.

Asbestos

- It is recommended and should be mandatory in the planning conditions in any grant of planning permission for the proposed Wind Farm that that all contractors shall take every reasonable step necessary to ensure that any material used during the construction, operational and/or decommissioning phases of the project shall not contain either or both asbestos or materials containing asbestos.
- All work shall be conducted in accordance with S.I. No. 386/2006 - Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006 with particular regards to regulation no.7 of these regulations which state;
 - “An employer shall not undertake any work which would expose or would be liable to expose an employee to dust arising from either or both asbestos or materials containing asbestos at any premises unless he or she has either
 - (a) Carried out a risk assessment as to whether asbestos or materials containing asbestos is present or is liable to be present in those premises; or
 - (b) if there is doubt as to whether asbestos or materials containing asbestos is present in those premises he or she shall -
 - (i) assume that asbestos or materials containing asbestos is present, and
 - (ii) comply with the provisions of these Regulations as appropriate”
- Any demolition works required at the facility should be fully assessed for the presence of asbestos and if identified on the site a site specific Asbestos Management Plan shall be submitted regarding the effective removal of asbestos from the site.
- Prior to the commencement of the removal works on site, the applicant shall employ a specialist asbestos contractor who shall submit a detailed proposal to the Planning

Authority to be agreed, prior to commencement of the work to ensure that asbestos materials will be removed in accordance with all relevant legislation.

- The specialist contractor shall be present on site during this work and shall determine the extent of the removal required.
- Details to include the name of the company responsible for transporting the asbestos off site including their Waste Collection Permit Number.
- The details of the facility where the asbestos is to be transported to include the EPA waste licence number of this facility should be included in the Plan.



Adrian Kielty

Senior Engineer

8th July 2026



Appendix III Report from Emergency Services Department

To: Senior Planner

From: Nathan Gregg, SACFO

Planning Ref. PAX12.324290 - Lissinagroagh Wind Farm

Date: 13/07/2026

Based on the planning documentation available please note the views of the Fire Authority in respect of the proposed Wind Farm referenced above:

1. The proposed Substation Building, is indicated to be the subject of a separate planning application. Accordingly, every works or building to which the requirements of the Building Regulations, 1997 applies, shall be designed and constructed in accordance with the appropriate requirements of the 2nd Schedule to the Building Regulations, and, no works shall be carried out to a building which would cause a new or greater contravention in the building with regards to any provision of these regulations.

2. The development shall be so designed and constructed that there is adequate provision for Fire Brigade vehicle access and such other facilities as may be reasonably required to assist the fire service in the protection of life and property.

The proposed works should be in accordance with Table 5.2 of Technical Guidance Document B Fire Safety, 2006, and, in particular roadways should be provided with a minimum carrying capacity of 26 tonnes in accordance with the heaviest appliance operated by Leitrim Fire Service.

3. A suitable and adequate water supply complete with hydrants installed in accordance with IS 391: 2020 should be considered in respect of any proposed buildings. Any water supply to industrial developments should have a minimum nominal diameter of 150mm and have a water supply capable of delivering a minimum of 20 to 35 litres per second through any hydrant.

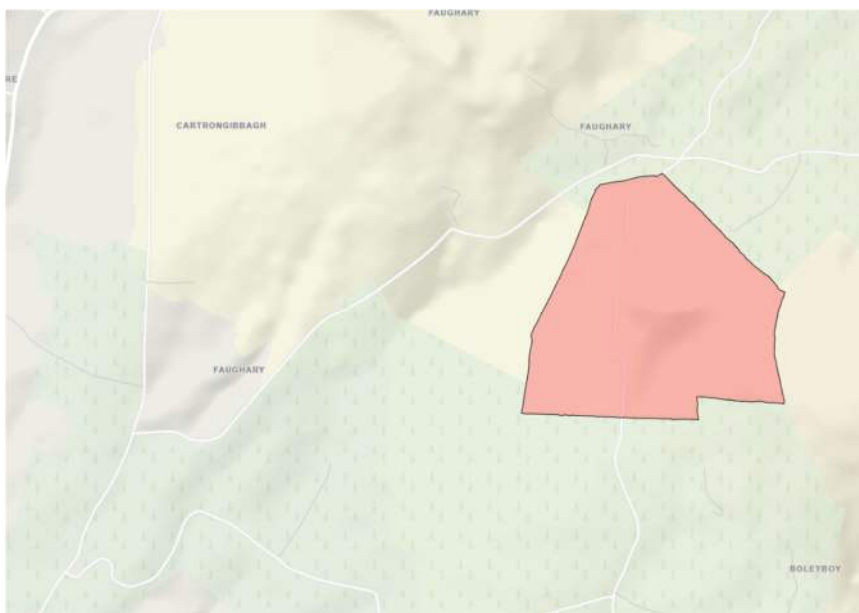
Nathan Gregg

**Senior Assistant Chief Fire Officer
Leitrim County Fire Service**

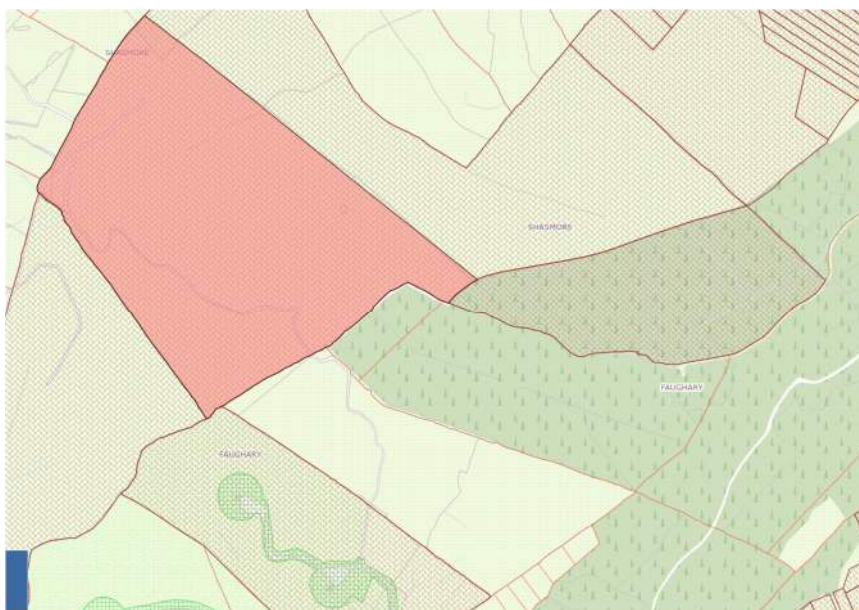
Appendix IV Landownership

The application form states that a signed consent letter on behalf of the Landowners is enclosed at Addendum 2 of the application form. The quality of the submitted map from Coillte as main landowner is limited in its legibility. Turbines 3, 7 and 9 are not included in this landholding.

Folio LM12366N and LM19126F are in the ownership of Mr. Eugene Fox. Their extent is shown below with the latter being located north of the existing Faughary wind farm. This is the location of proposed turbine no. 3. The former folio contains the site of proposed turbine no. 7.

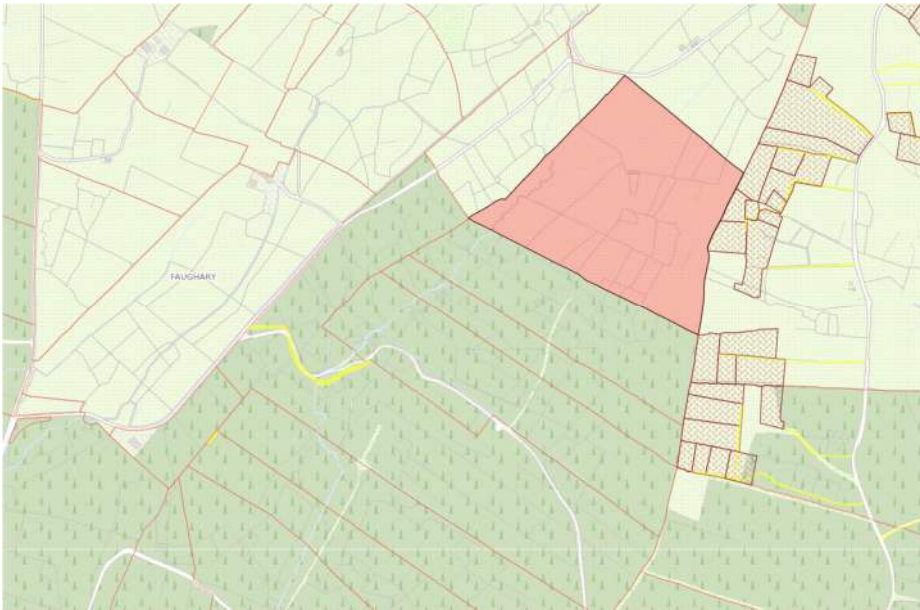


Folio LM12366N



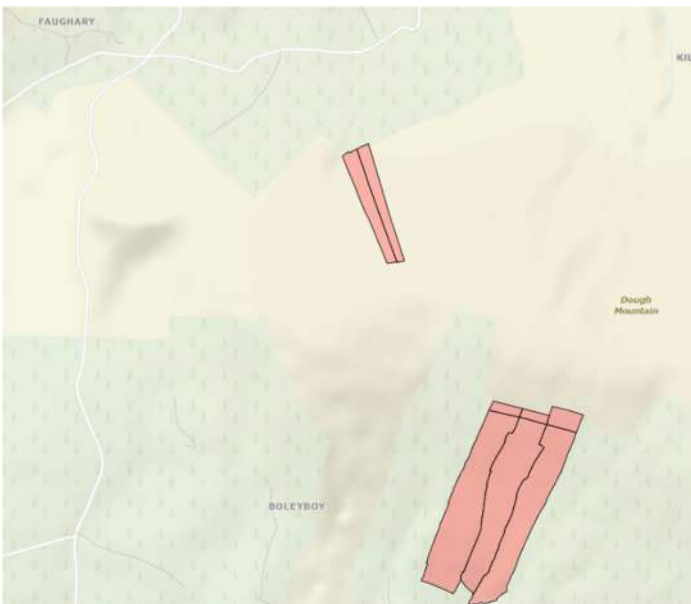
Folio LM19126F

Folio No. LM8611 is in the ownership of Ms. Margaret Walsh deceased. This is the location of proposed turbine no. 9.

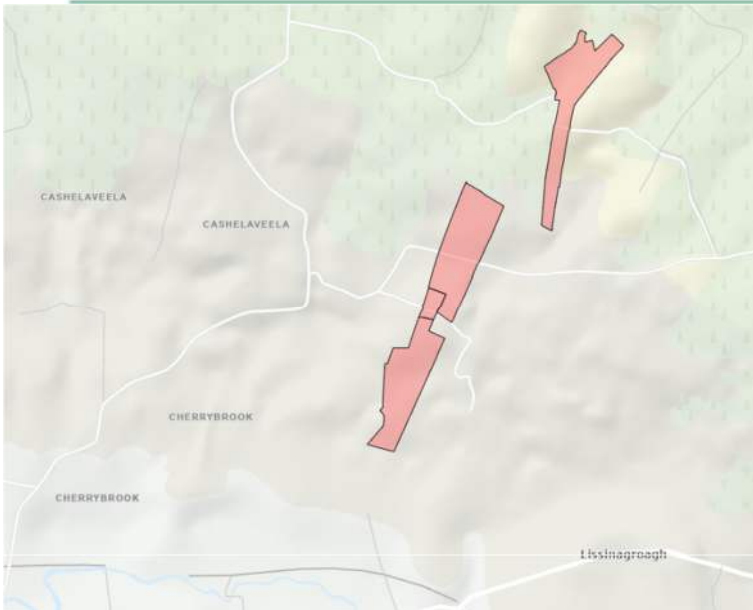


Folio No. LM8611

Folio No. LM910F is in the ownership of Mr. Gerard Crowley. This relates to 4 separate parcels of land. The southern most parcel is not included in the red line boundary of the application site. The second most southern parcel is partially included as part of the access road widening to serve proposed Borrow Pit No. 3 is located immediately to the west. Neither of the northern parcels are included in the red line boundary of the application site.

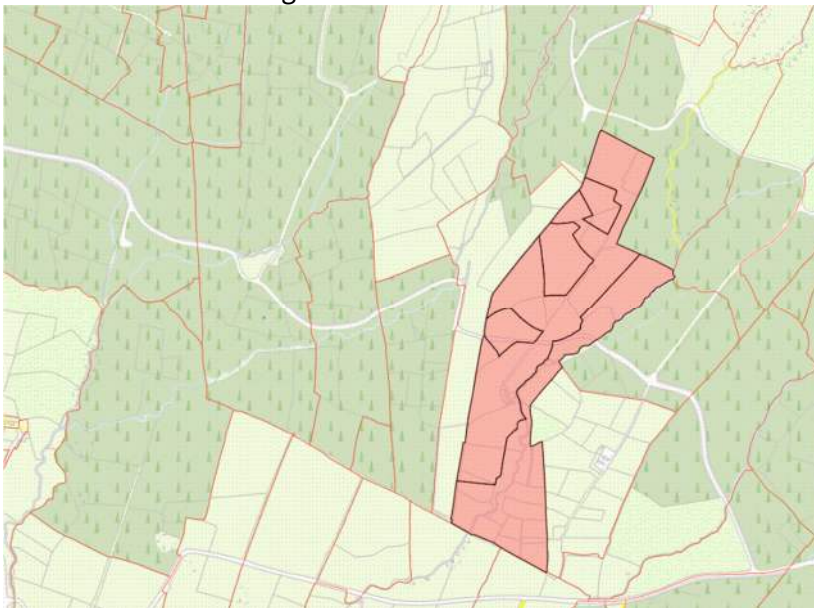


Folio No. LM910F northern parcels



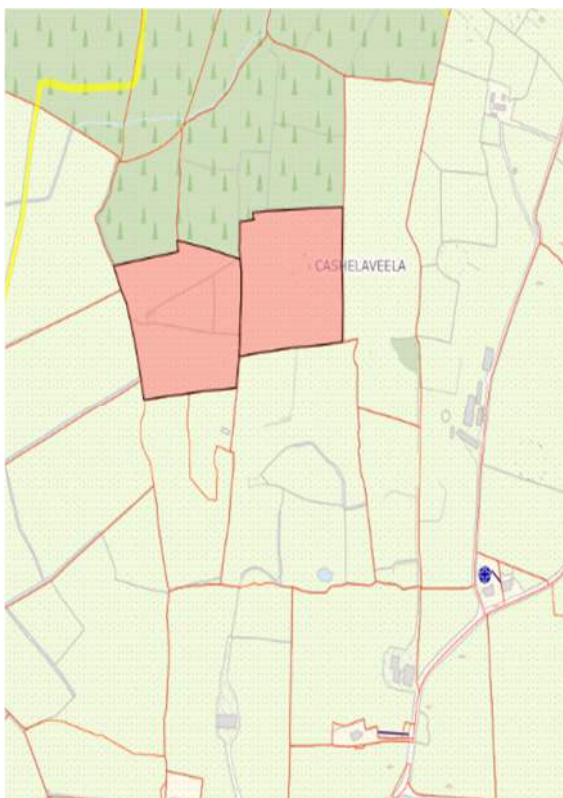
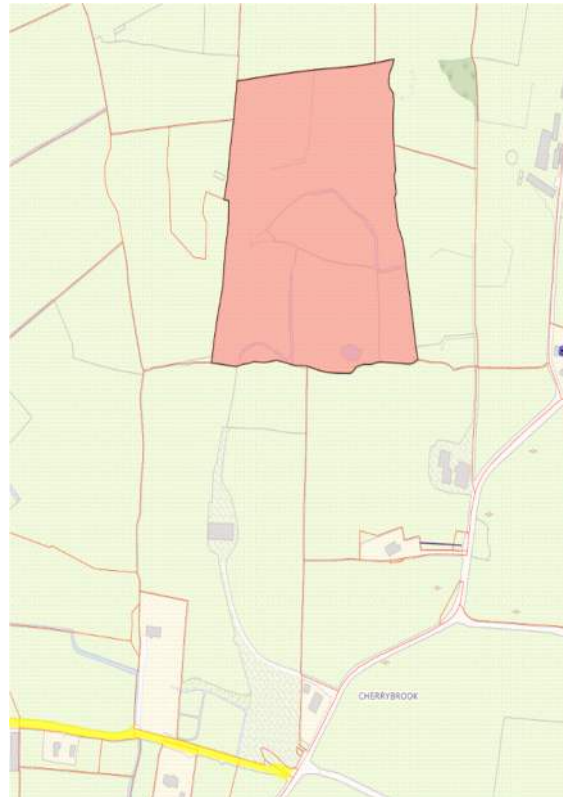
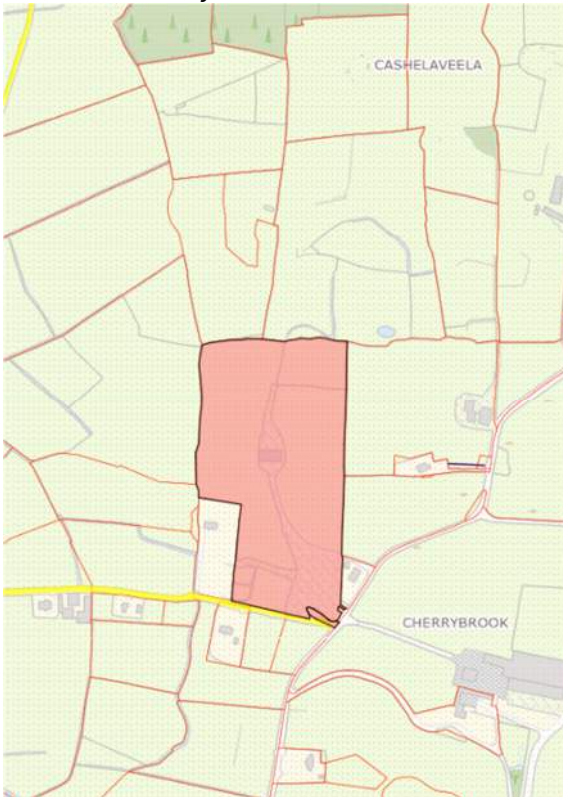
Folio No. LM910F southern parcels

Folio No. LM3854F (below) is in the ownership of Mr. Michael Vincent McMorrow deceased. It contains part of the site of T13 including access roads.

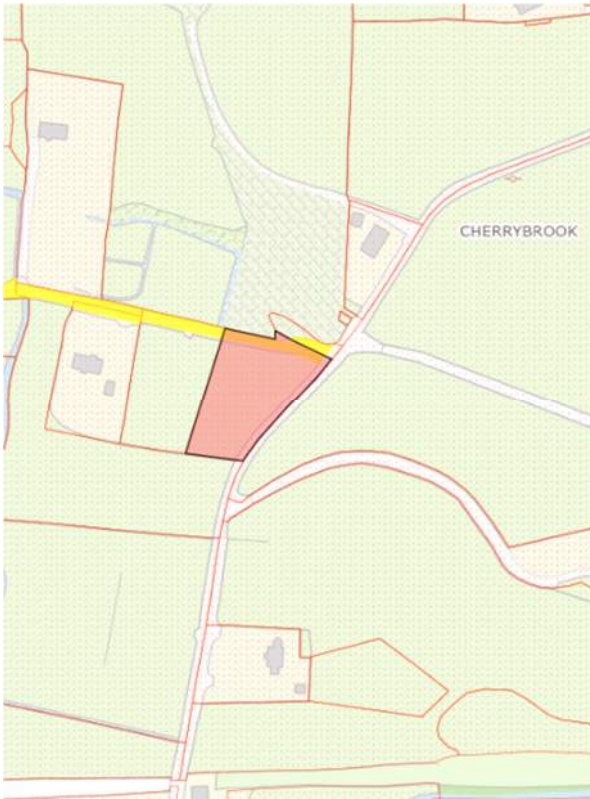


Folio No. LM3854F

Folio LM718F, LM10480 and LM15947 are in the ownership of Michael and Caitriona Clancy. All of the folios are provided below and are contiguous to each other. They relate to the construction of the proposed access road from Cherrybrook.

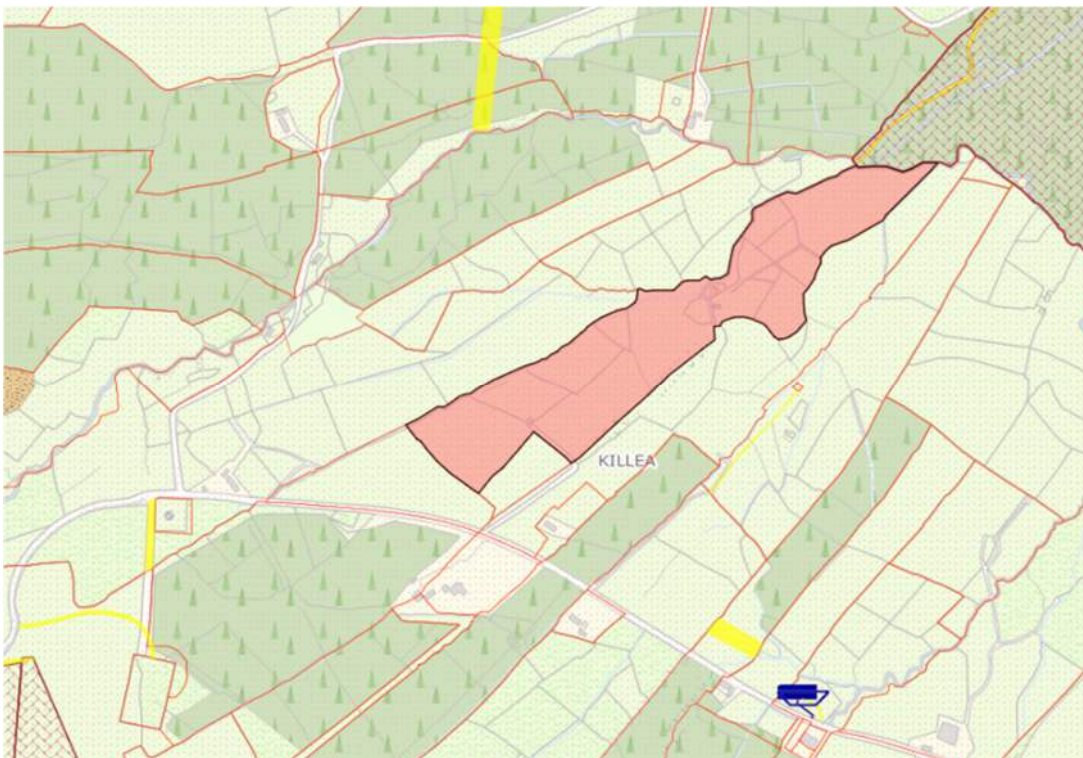


Folio LM12569F is in the ownership of Gerard and Goretti Keaney. It is south of the previous landholding and relates to the temporary road crossing.



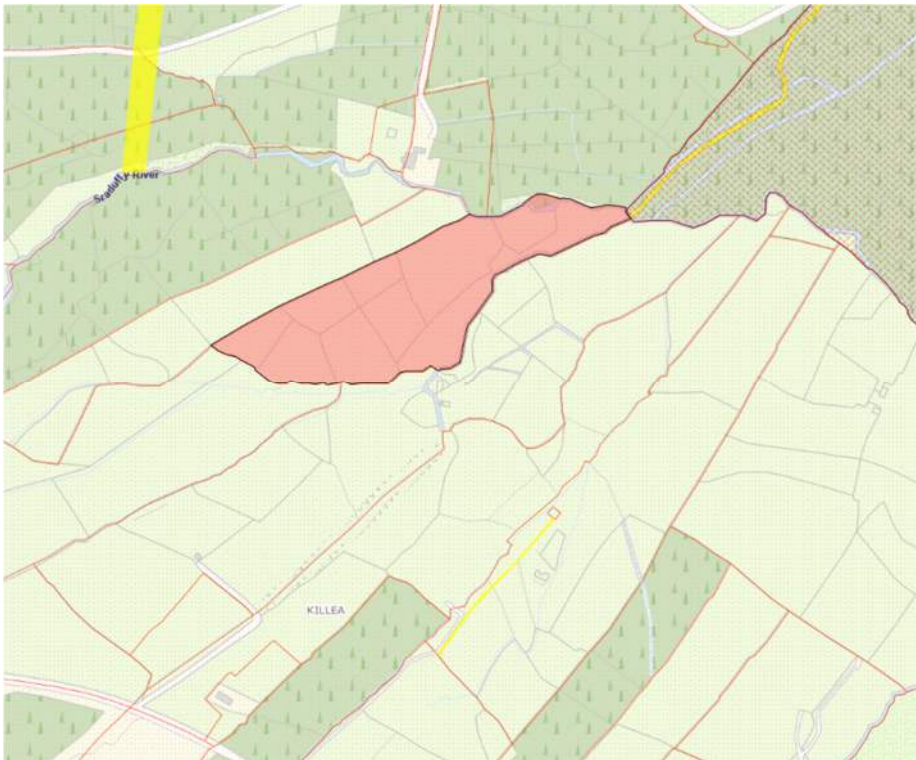
Folio LM12569F

Mr. Gerard Rooney is the landowner of a number of Folios, ref. LM12251N, LM12250N, LM12708N, LM12252N, LM15913N, LM17071N, LM13474N, LM17211F and LM12420N.



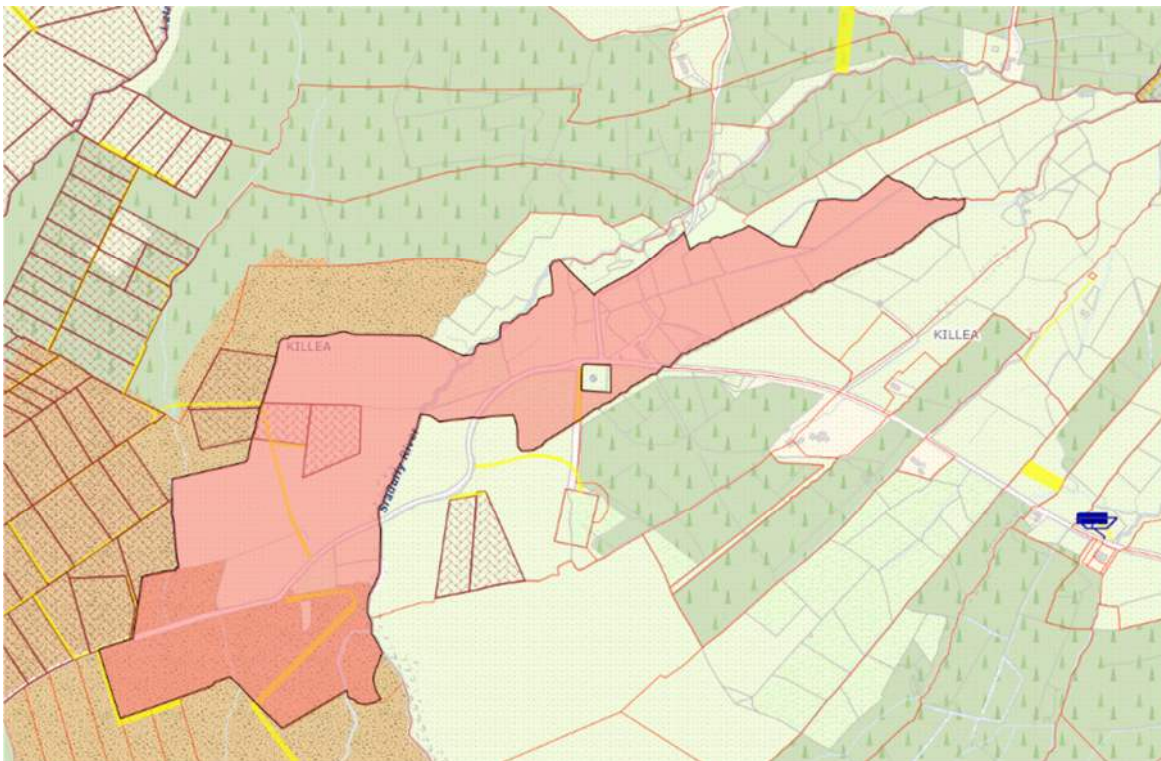
Folio LM12251N

Biodiversity Management Area

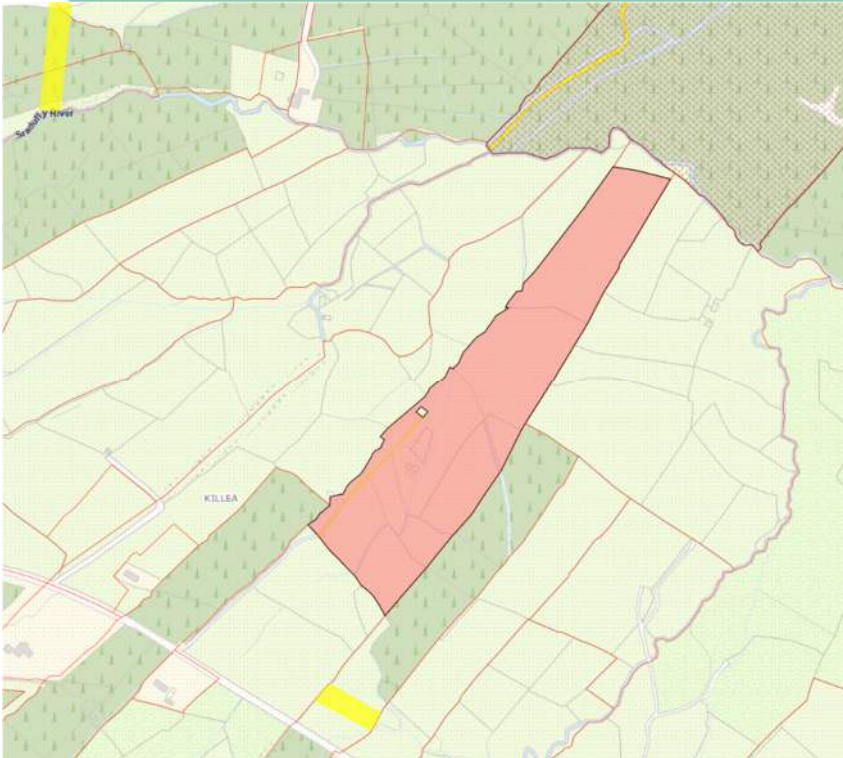


Folio LM12250N

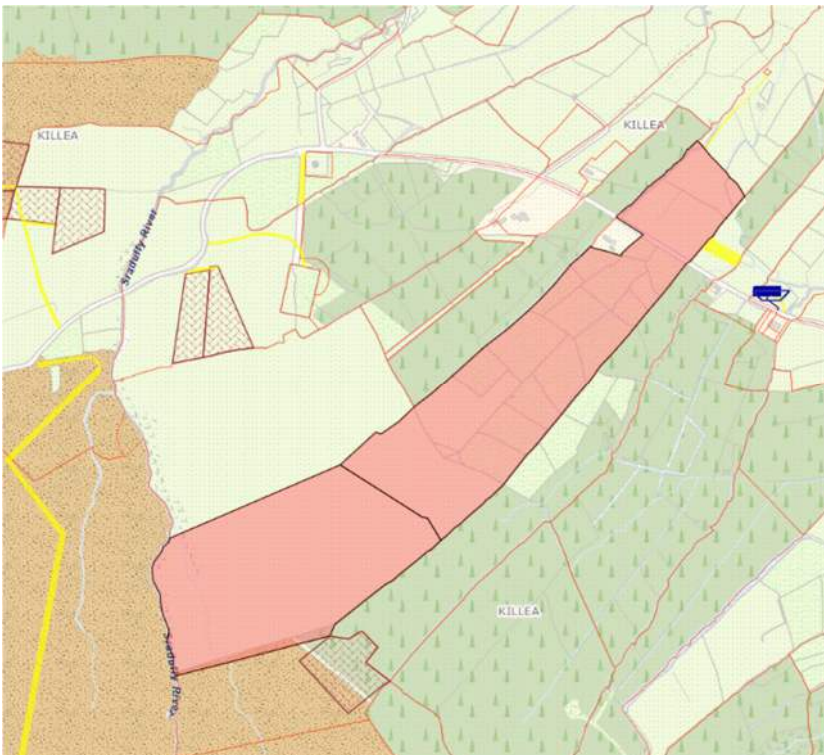
Biodiversity Management Area



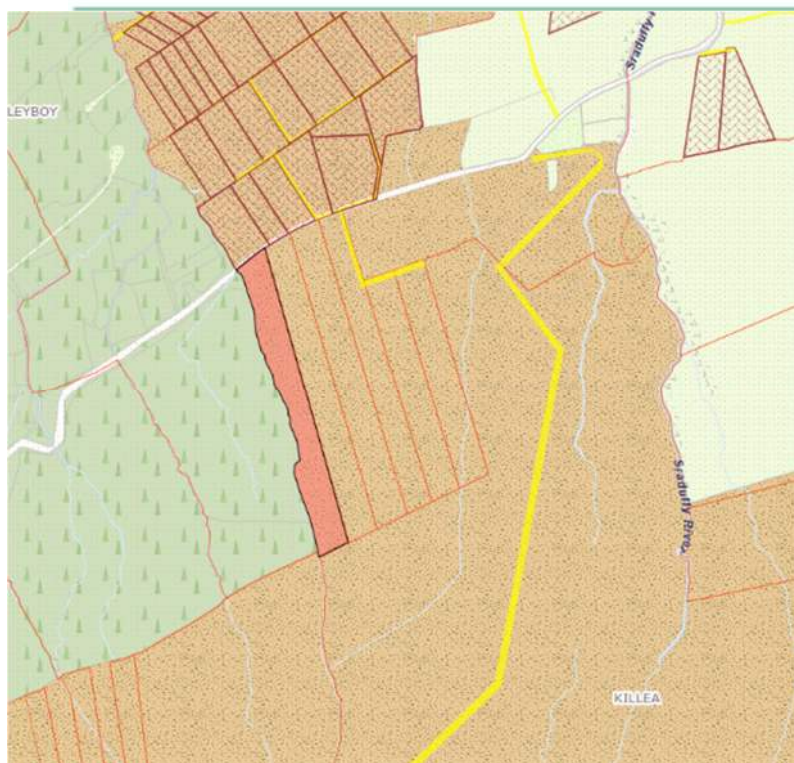
LM 12708N Biodiversity Management Area



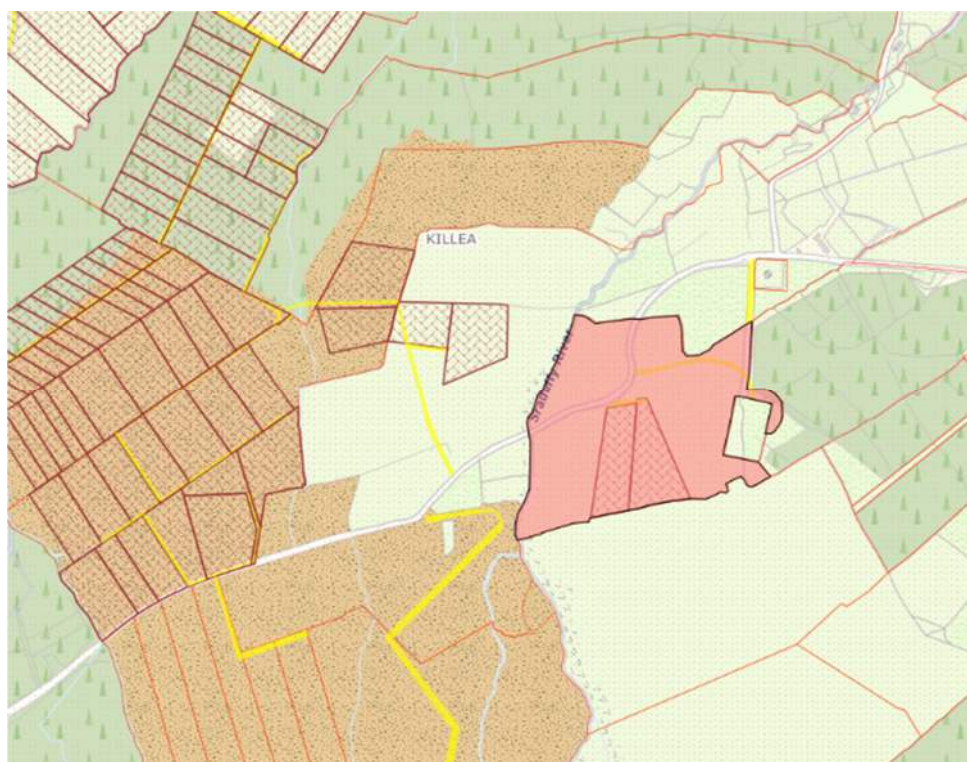
LM 12252N Biodiversity Management Area



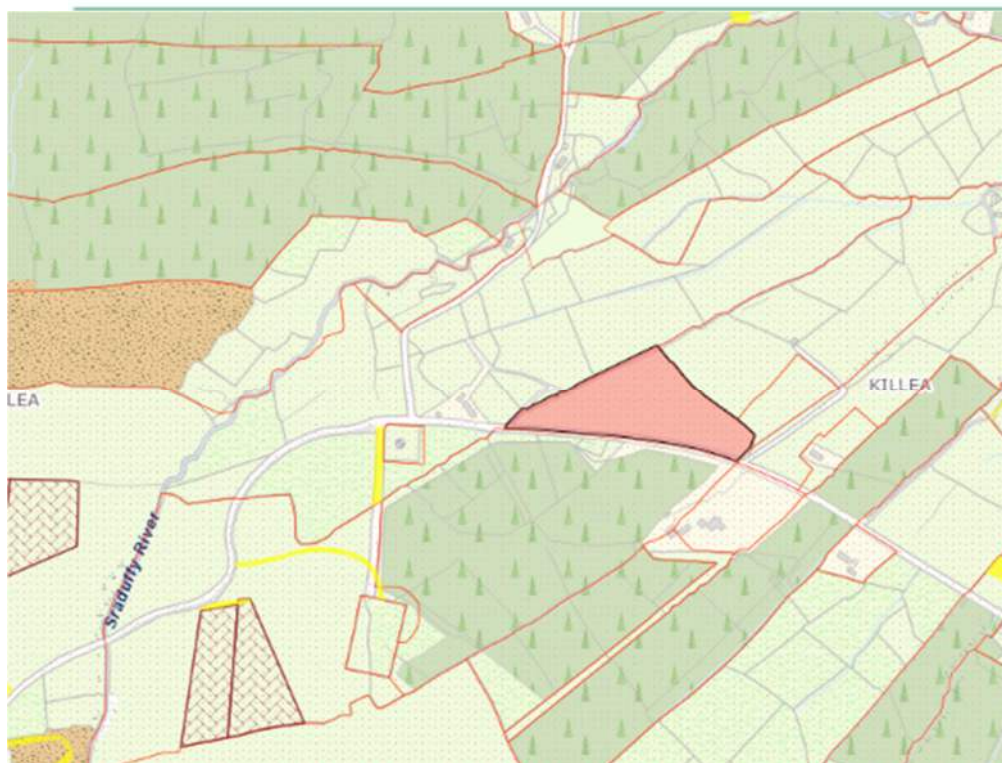
LM15913N Biodiversity Management Area



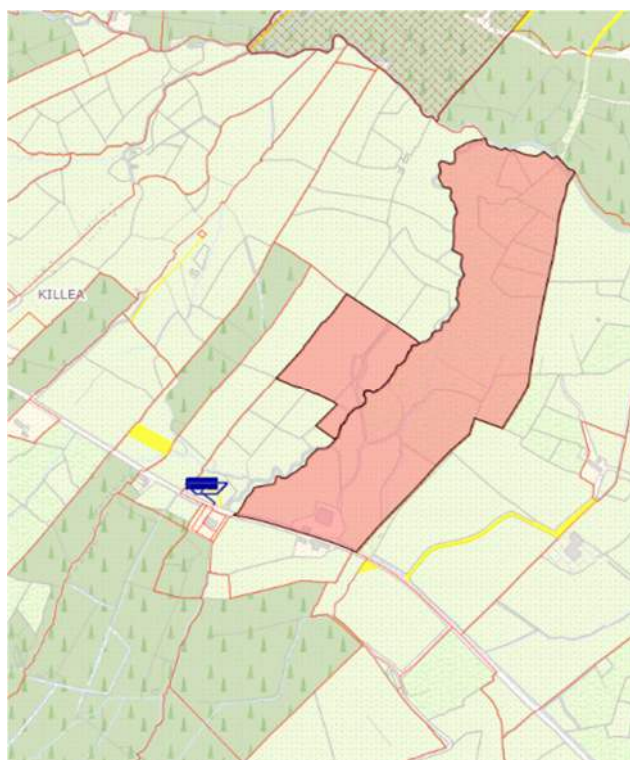
LM17071N Biodiversity Management Area



LM13474N Biodiversity Management Area

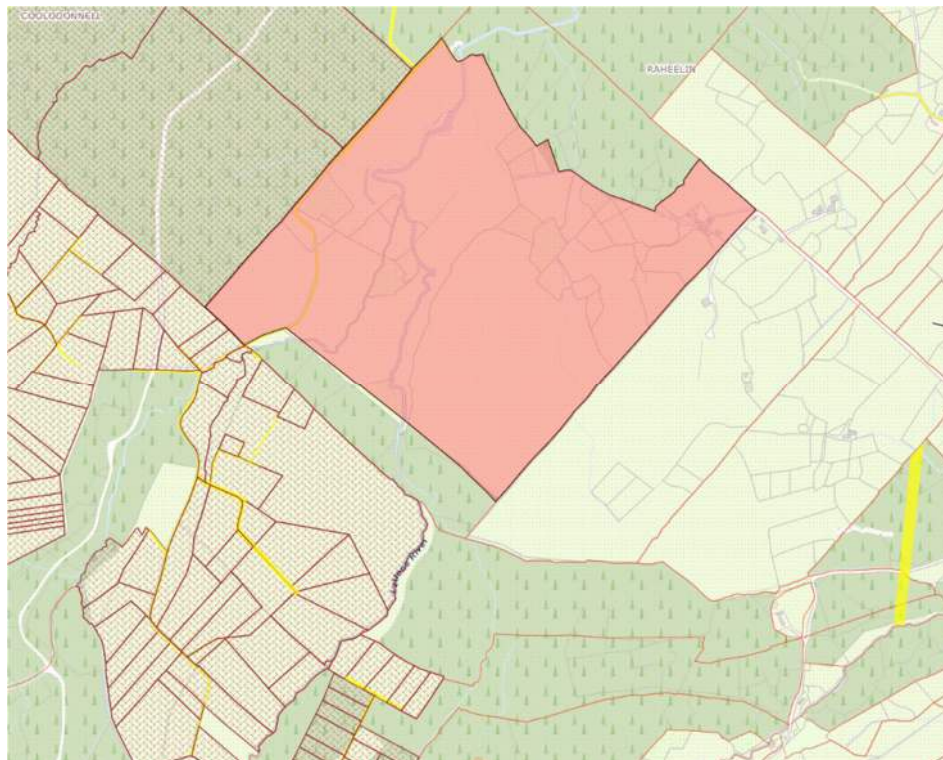


LM17211F Biodiversity Management Area



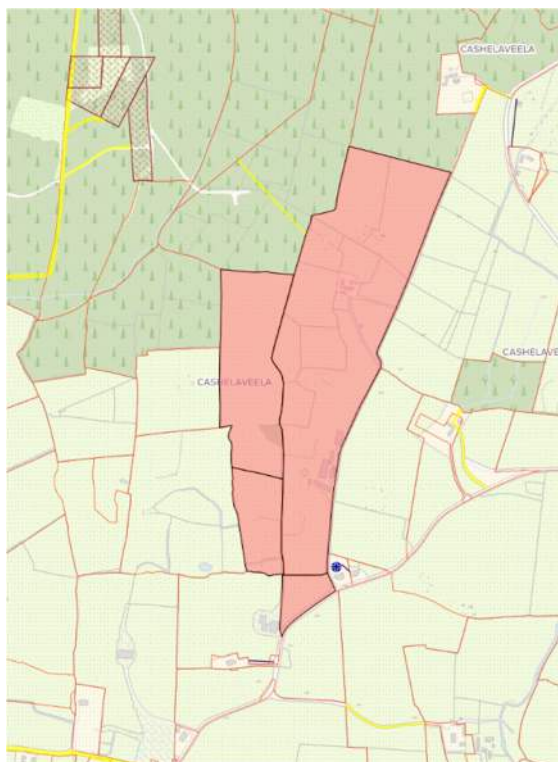
LM12420N Biodiversity Management Area

Ms. Margaret Mulkeen is the registered landowner of Folio LM9736. This is a proposed Biodiversity Management Area



Folio LM9736

Mr. James Tracey is the registered landowner of Folio LM3385F. This is a proposed Biodiversity Management Area



Folio LM3385F



Appendix V Copy of Record of Meeting dated 18.12.2000 with Coillte and Tobins

Information meeting held between Coillte and Leitrim County Council – Friday 18th December 2020 at 2.00 p.m. via Microsoft Teams.

In attendance:

- Mark McCarthy, Project Manager and Planner, Tobins Consulting Engineers
- Emmet McLoughlin, Project Manager, Coillte
- Sinead O'Malley, Planning Manager, Coillte
- Bernard Greene, Senior Planner, LCC
- Vivienne Egan, Senior Executive Planner, LCC

Mark McCarthy gave a presentation on the proposed Lissinagroagh Wind Farm which would comprise possibly between 17 – 22 wind turbines and all associated infrastructure. No details on the proposed means of connecting to national electricity transmission network was outlined or discussed. The number of turbines is currently under consideration, but it is considered likely that it would exceed Strategic Infrastructure thresholds as set out in the Planning Acts, i.e. *"An installation for the harnessing of wind power for energy production (a windfarm) with more than 25 turbines or having a total output greater than 50MW"*. If, over the course of the design and Environmental Impact Assessment (EIA) process, the size of the project is reduced and falls below this threshold then the planning application would be directed towards Leitrim County Council. This was considered unlikely on the basis of the information presented.

The project itself is at an early stage. Whilst ornithological survey work has been ongoing since 2017, the EIA Reporting process only commenced in recent months and the overall programme for this project is to complete the EIAR and submit the planning application for statutory approval in October 2021.

The presentation outlined:

- The Site - its land use characteristics, constraints, etc.
- The Proposed Wind Farm – the wind turbines, number, size and scale.
- The EIA process – the environmental work completed to date and the nature of ongoing and future environmental assessment work which will be carried out as part of the preparation of the EIAR.
- Community Engagement.
- Planning Consents Route.
- Programme.

Following the presentation, the following general opinion was presented by Bernard Greene / Vivienne Egan:

- Clarification that a considerable portion of the study area was contained within Dough Mountain High Visual Amenity Area in the County Development Plan (CDP Ref. B3).
- That the boundary of the study area was immediately adjacent to Dough / Thur Mountain NHA.
- The timeline to publish a draft County Development Plan was behind schedule, likely to be published at some stage next summer. Having regard to the proposed submission of the SID application in Q4 2021, the current CDP would be the statutory plan against which the proposal was likely to be assessed.

- That national, regional and local planning policy was supportive of the principle of renewable energy including wind energy. The project would therefore be determined against its impact on natural heritage, visual amenity, the setting of Manorhamilton and potential impact on residential amenity.
- That Leitrim County Council as part of the preparation of the new County Development Plan have undertaken a review of the Landscape Character Assessment although this would not be considered to affect the assessment of the proposed development.
- A review of the designated landscapes / views and prospects is ongoing but that the extent of Dough Mountain High Visual Amenity Area would remain unchanged.
- A Renewable Energy Strategy has been prepared which includes examining the potential for onshore wind energy. A sieve analysis was undertaken in accordance with the recommendations of the draft Wind Energy Guidelines which excluded areas with a wind speed of less than 7.6 m/s, Natura 2000 sites, areas of landscape designation and also considered the proximity of the electricity transmission network. To refine these areas of search, a landscape capacity assessment to consider the impact of further wind energy developments was considered. This included acknowledging that an area west of Dough Mountain could possibly have some potential. It was clarified that the Renewable Energy Strategy did not indicate any areas where further wind energy proposals were acceptable in principle due to the number of constraints identified. These documents would be published as part of the County Development Plan and would be subjected to SEA / AA which has not yet occurred. There was no 'show stopper' in the various documents which would prevent consideration of a proposed wind farm at this location, each would be assessed on its own merits.
- Proximity to Saddle Hill Windfarm was queried. The view was expressed that there is concern with regard the siting of wind farms of 2 different turbine sizes in close proximity causing confusion in the landscape.
- The planning history associated with the previous proposal of 8 no. turbines at Dough Mountain was discussed (P09/260). It was indicated that the promoters of this development contacted the Planning Authority a number of years ago to explore the prospect of developing a wind farm on the adjoining Thur Mountain. Having considered the reasons for refusal and the quality of the previous application and EIS, the Planning Authority discouraged the proposal. Contact was made less than one month ago again trying to resurrect the proposal on Thur Mountain. Particular attention to the previous reasons for refusal for a considerably smaller development at this location should be taken by the promoters.
- Concern was raised due to the proximity of the proposed development to the town of Manorhamilton which is being promoted for its intrinsic built and cultural heritage. The separation distance of 3km could result in the development dominating this urban settlement and was likely to generate significant opposition.
- The promoters were advised to include the Elected Members of the Manorhamilton MD in their consultation programme so that they would be aware of the proposal when contacted by constituents. The promoters were advised to contact Kieran Brett, Meetings Administrator in order to arrange an informal briefing. This should be separate from an MD meeting as the local media would be in attendance at such meetings.
- LCC assured that a copy of the assessment undertaken by RPS would be made available which dealt with the bogslide at the Dawn of Hope bridge if publicly available.
- The contours at which the proposed wind farm would be located at were discussed and it was confirmed that they would be sited between 108 – 308 metres AOD.
- A buffer of 750 metres would be ensured between nesting hen harriers although this needed to be clarified as such nesting areas are not indefinite in nature.

- The layouts presented are fluid and still depend on agreement being reached with individual landowners.
- It was suggested that as 2 of the proposed vantage points to assess the project are located in Fermanagh that Fermanagh and Omagh District Council along with the Northern Ireland Environment Agency should be consulted with.
- An application for a 100 metre meteorological mast will be submitted in January.

The next contact will be in February when scoping of the EIAR will be tabled with LCC.

Actions

- A copy of the presentation will be forwarded to LCC.
- LCC will provide shapefiles of the existing designated landscapes and boundaries of LCA upon request.
- LCC to provide copy of the RPS report on bogslide if publicly available.
- LCC to provide contact details for Kieran Brett, Meetings Administrator, Manorhamilton MD.
- LCC to provide contact details for Fermanagh and Omagh District Council and the Northern Ireland Environment Agency.

Bernard Greene,
Senior Planner.

Lissinagroagh Wind Farm Strategic Infrastructure Development / RED III Application

Bernard Greene
Senior Planner



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Strategic Infrastructure Development Application

- What is it?
- Section 37A Planning & Development Act 2000, as amended - special application process
- Categories of development specified - 7th Schedule of Act
 - Windfarm development where generated energy >50 MW
- Commission then decides
 - a) Would it be strategically, economically or socially important to the state or the region **OR**
 - b) Would it contribute substantially to fulfilling any of the objectives of the NPF or RSES **OR**
 - c) Would have a significant effect on the area of more than one Planning Authority
- All SID applications must be accompanied by EIAR; may require NIS

SID Process

- Confirmation by An Coimisiún Pleanála that proposal is SID - ACP-32-323048 - 22.04.2026
- Leitrim County Council were notified of decision on 24.04.2026
- Direct application lodged to An Coimisiún Pleanála - who will determine the application and undertake the EIA and Habitats Directive Assessment - 14.05.2026
- All documentation available on the Commission's website
- Public consultation period was 8 weeks - ended on Friday 10.07.2026
- Consultation process with Prescribed Bodies by applicant with responses to the Commission
- Leitrim County Council is a Prescribed Body i.e. a consultee but given 10 weeks to reply – 22.07.2026

SID Process - Leitrim County Council's role

- Required to make all documents available for public inspection
- Section 37E - Chief Executive must submit a report to An Coimisiún Pleanála setting out the views of the Planning Authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area.
- Section 34E(5) - Chief Executive, shall, before submitting their report to the Commission, submit the report to the Members of the Planning Authority and seek their views on the proposed development.
- Report was circulated to the Members on Wednesday evening, 15.07.2026
- Section 34E(6) - provides that the Members may, by resolution, decide to attach recommendations to the report of the Authority;
- Such recommendations (together with the meetings administrator's record) shall be attached to the report submitted to the Commission by Wednesday.

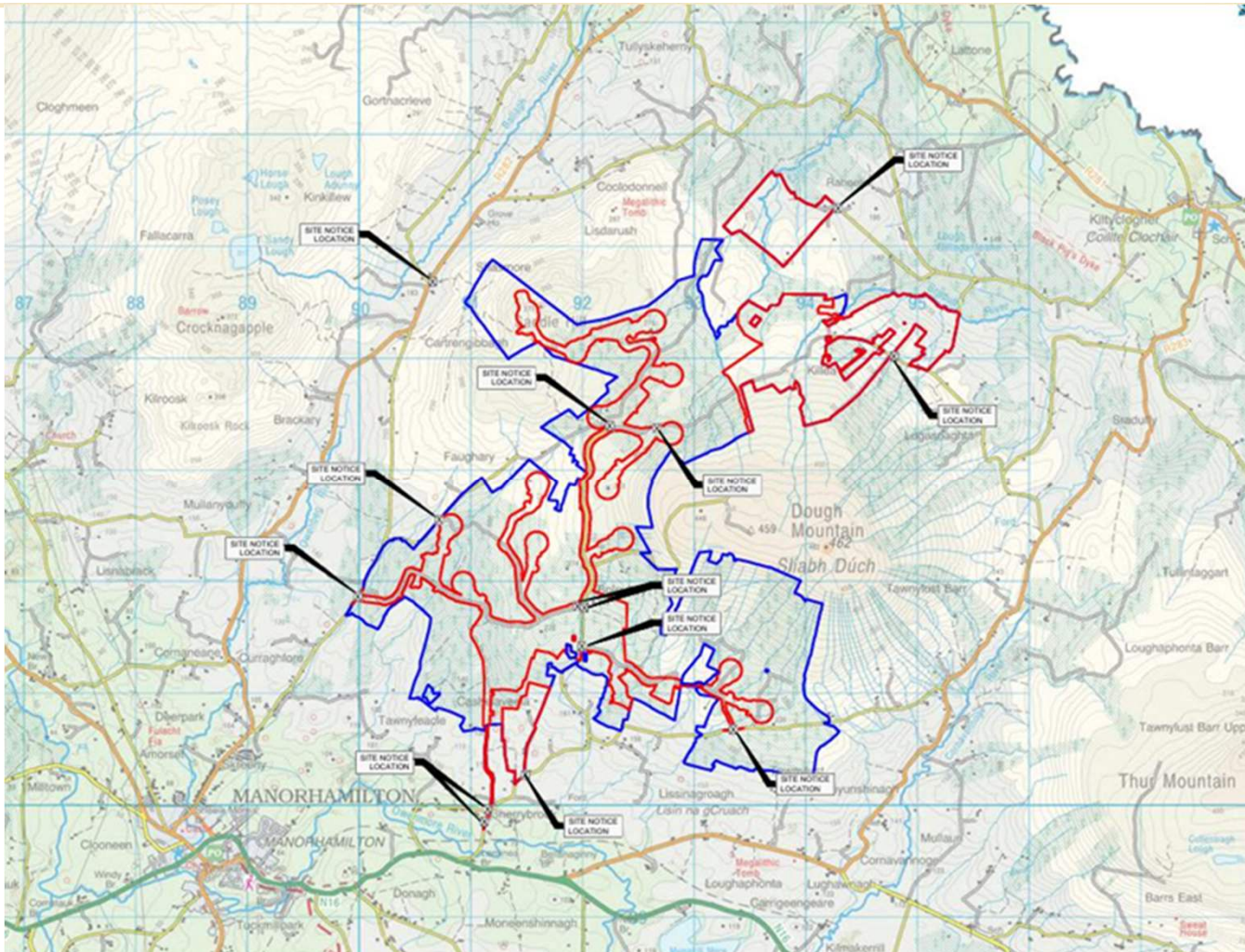
Lissinagroagh Wind Farm – Description of Development

- 14 no. wind turbines - blade tip height 180 - 185m, a rotor diameter 149m - 163m inclusive, a hub height 101m - 110.5m;
- Permanent meteorological mast with a height of 100m;
- Modifications to an existing site accesses & creation of new temporary accesses;
- Approximately 7.95 km of new internal access tracks to include passing bays and associated drainage;
- Upgrade of approximately 8.35 km of existing access tracks, to include passing bays and associated drainage;
- 10 no. clear span bridges and 1 no. existing culvert extension at watercourse crossings by access tracks;
- 3 no. borrow pits with a total available area of 63,352 m² for temporary use during construction;
- 2 no. temporary construction compounds each on an area of 9,100 m²;
- 7 no. permanent controlled access points on the L61801 and L6184 Local Roads to facilitate turbine delivery and construction works;
- A temporary crossing of unnamed local road in the townland of Cherrybrook to facilitate turbine delivery vehicles during construction only;
- Biodiversity enhancement areas (218.5 ha) to provide nesting and foraging habitat for birds, and;
- Ancillary forestry felling to facilitate construction and operation of the proposed project.



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Location

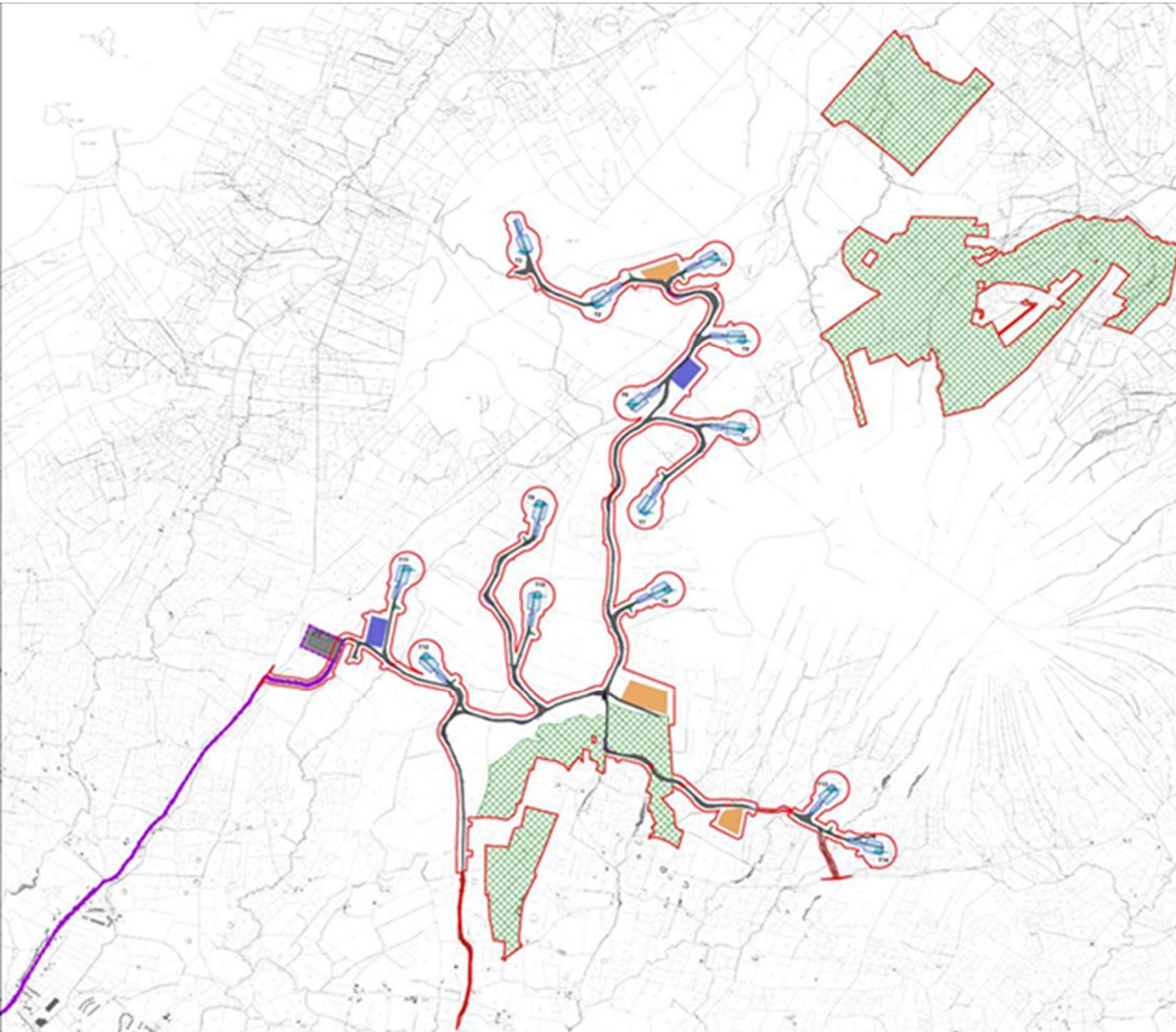


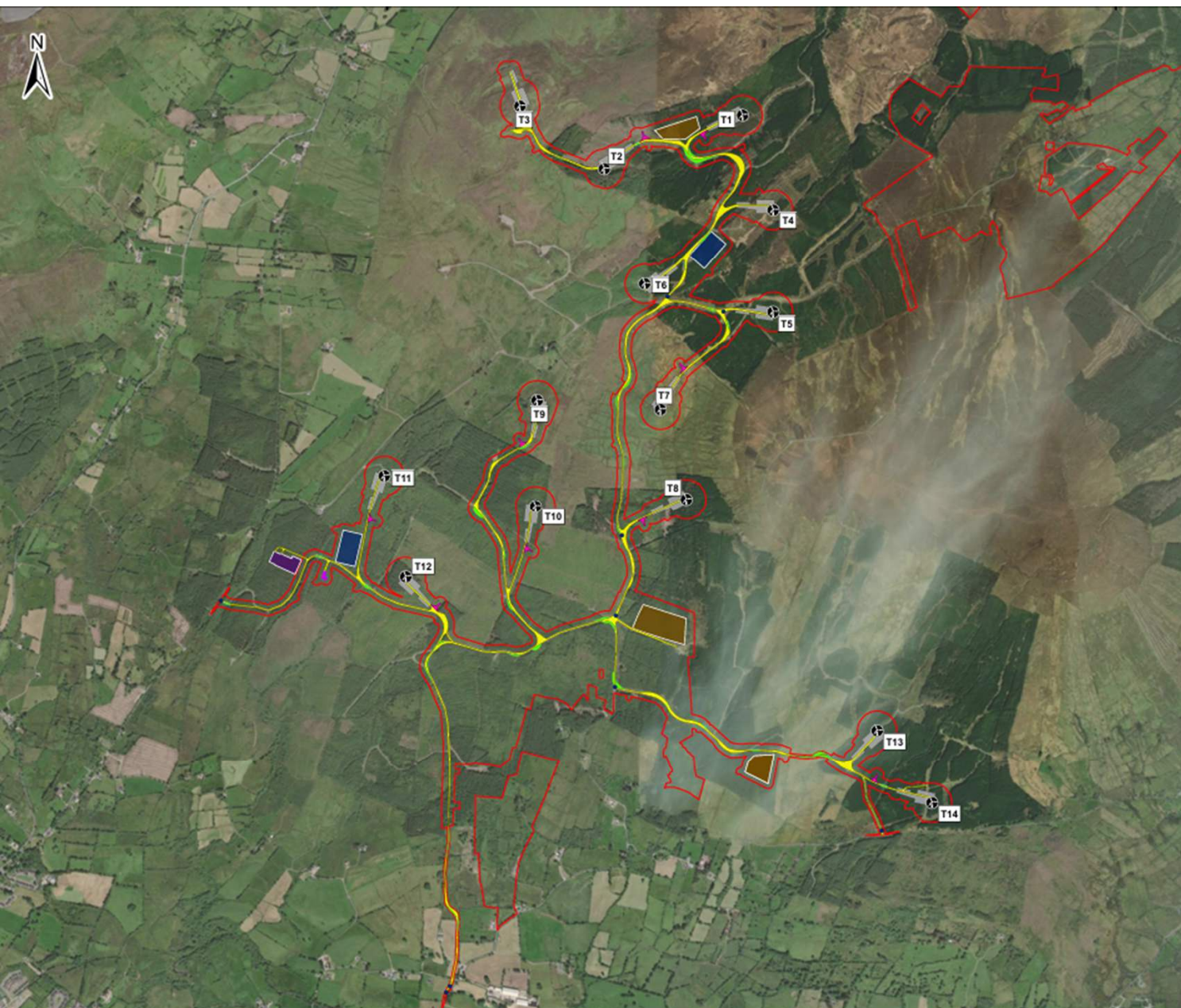
- Application Site - 389 ha
- Wider landholding – 1,096 ha (Coillte 785 ha)
- 3 km from Manorhamilton
- 4km from Kiltyclogher
- Wraps around west of Dough Mountain
- Adjoins existing Faughary windfarm on Saddle Hill
- Coniferous forestry land use
- 170 – 380 m AOD elevation



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Site Layout



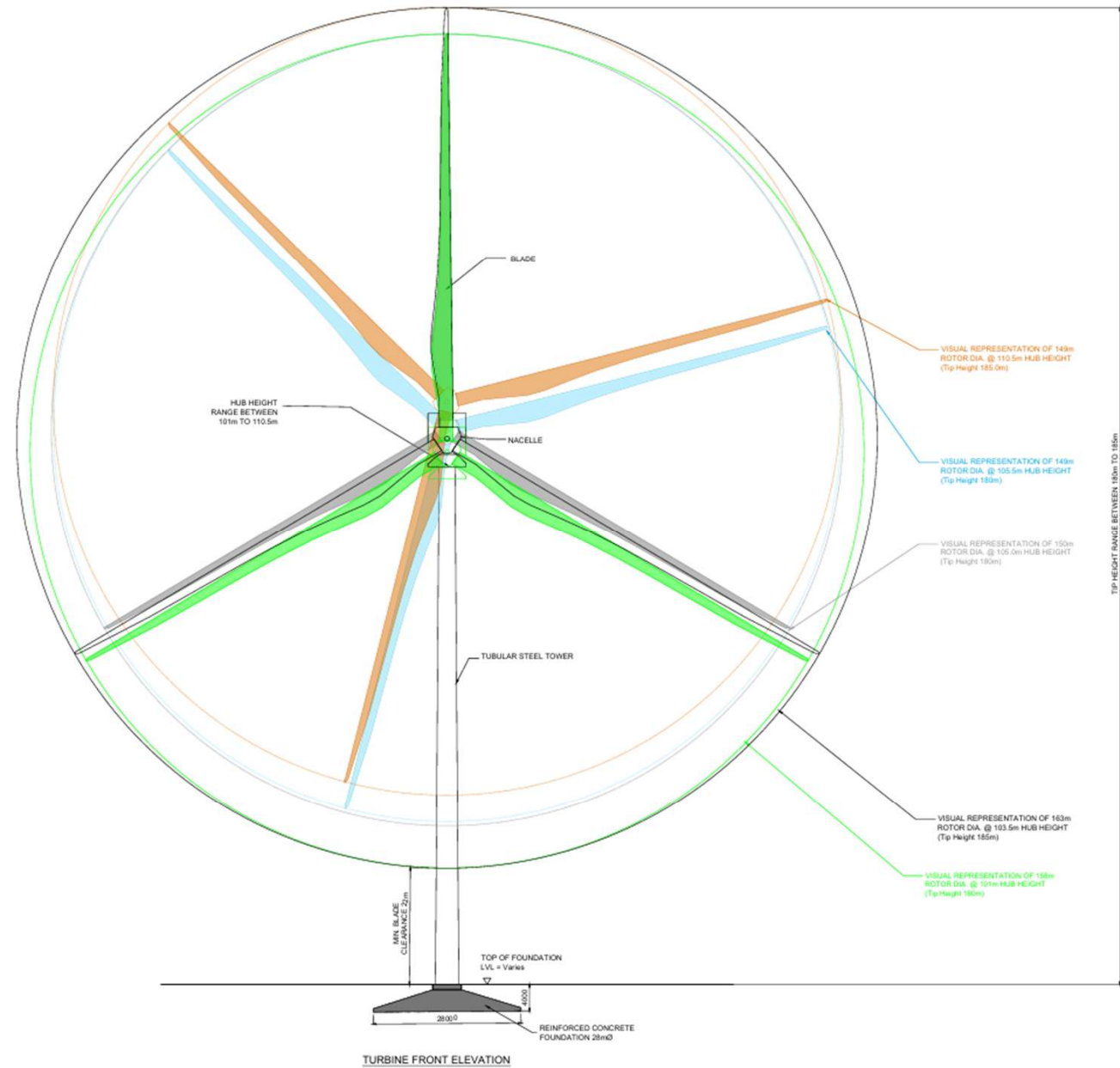
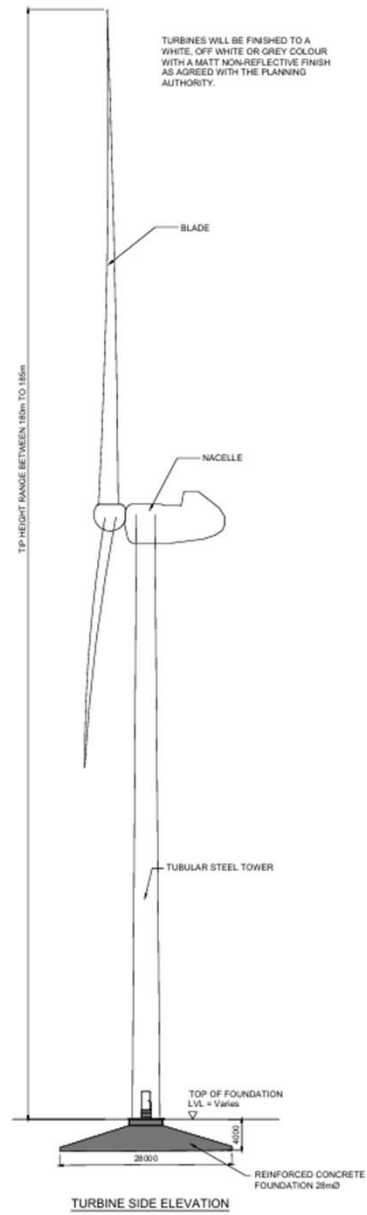


Site Layout



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Strategic Site Selection

- FuturEnergy Lissinagroagh Designated Activity Company is owned by FuturEnergy Ireland, jv company Coillte and ESB
- 2014 - detailed screening process of their land portfolio (c. 441,000 hectares) using GIS software
 - Min wind speed of 6.5 m/s at height of 100 metres; >300 hectares contiguous site area; Viable distance to grid;
- Identified Croagh in initial screening in 2014 and Lissinagroagh in Phase II screening in 2017
- Contributes towards meeting our legally binding objectives to reduce CO₂ emissions by 2030 & net zero no later than 2050 – 80% of electricity generation by renewables by 2030
- Contributes towards Climate Action Plan 2025 target of 9GW of onshore wind energy generation by 2030
- Essential for achieving the strategic goal of transitioning to an economically competitive, secure, low-carbon climate resilient environment
- 10 year permission period sought - 35 year operational period
- Supply between 77 – 100.8 MW of renewable energy produced (each turbine 5.5 – 7.2 MW)

Site Selection Justification – Embedded Mitigation

The development design was informed by the following key constraints:

- Turbines were sited a minimum of 740 m (four time the maximum proposed tip height) away from residential dwellings;
- No works within 50m of EPA-mapped watercourses;
- No works within sensitive ecological sites (i.e. SAC, SPA, NHA, pNHA);
- No works within identified flood risk zones;
- Avoidance of recorded monuments;
- Avoidance of telecommunications infrastructure and links, where possible;
- Avoidance of existing electricity, gas and water supply infrastructure.



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EIAR Considerations

1. Introduction
2. Description of the proposed Project
3. Reasonable Alternatives
4. Population & Human Health
5. Biodiversity
6. Ornithology
7. Lands, Soils & Geology
8. Hydrology & Hydrogeology
9. Noise & Vibration
10. Shadow Flicker
11. Air Quality
12. Climate
13. Landscape & Visual
14. Archaeological, Architectural & Cultural Heritage
15. Material Assets
16. Traffic & Transportation
17. Major Accidents & Major Disasters
18. Interaction of the Foregoing
19. Schedule of Mitigation Measures
 - Non Technical Summary
 - Appendices (76 no.)



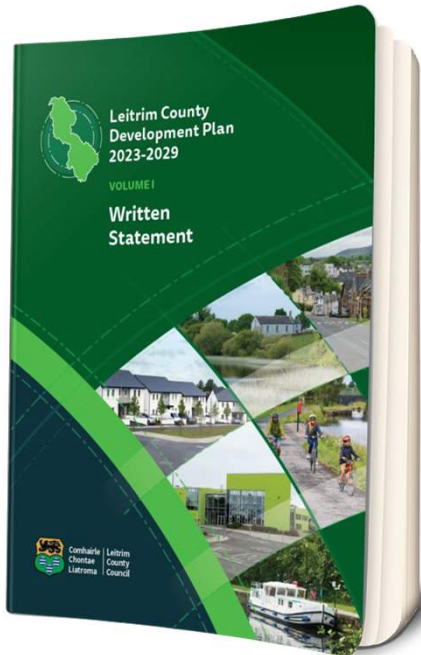
Appropriate Assessment Considerations

1. *Arroo Mountain SAC;*
2. *Ballysadare Bay SAC;*
3. *Ballysadare Bay SPA;*
4. *Ben Bulbin, Gleniff and Glenade SAC;*
5. *Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC;*
6. *Cummeen Strand SPA;*
7. *Donegal Bay SPA;*
8. *Drumcliff Bay SPA;*
9. *Glenade Lough SAC;*
10. *Lough Derg (Donegal) SPA;*
11. *Lough Gill SAC;*
12. *Lough Melvin SAC;*
13. *Lough Melvin SAC (NI); and,*
14. *Unshin River SAC.*

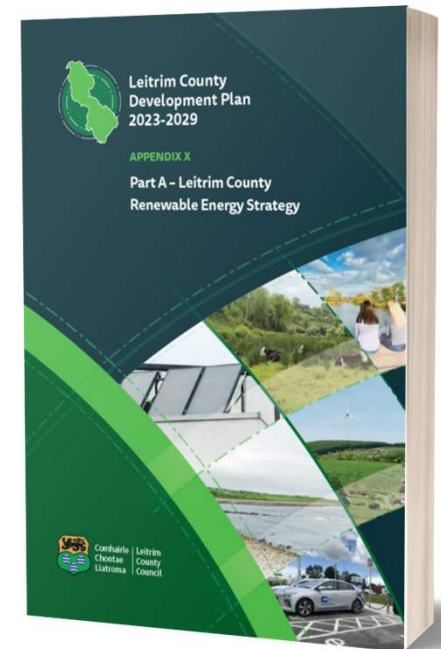
- The main potential impact pathways identified
 - habitat loss
 - groundwater contamination or alteration of groundwater flow
 - sedimentation or contamination of surface waters
 - disturbance or displacement of qualifying interest and special conservation interest species,
 - bird collision risk, and
 - the spread of invasive alien species.
- The most significant risks are associated with the construction phase, particularly excavation, dewatering, forestry felling, vegetation clearance, trenching along the Grid Connection Route, watercourse crossings and temporary works along the Turbine Delivery Route.



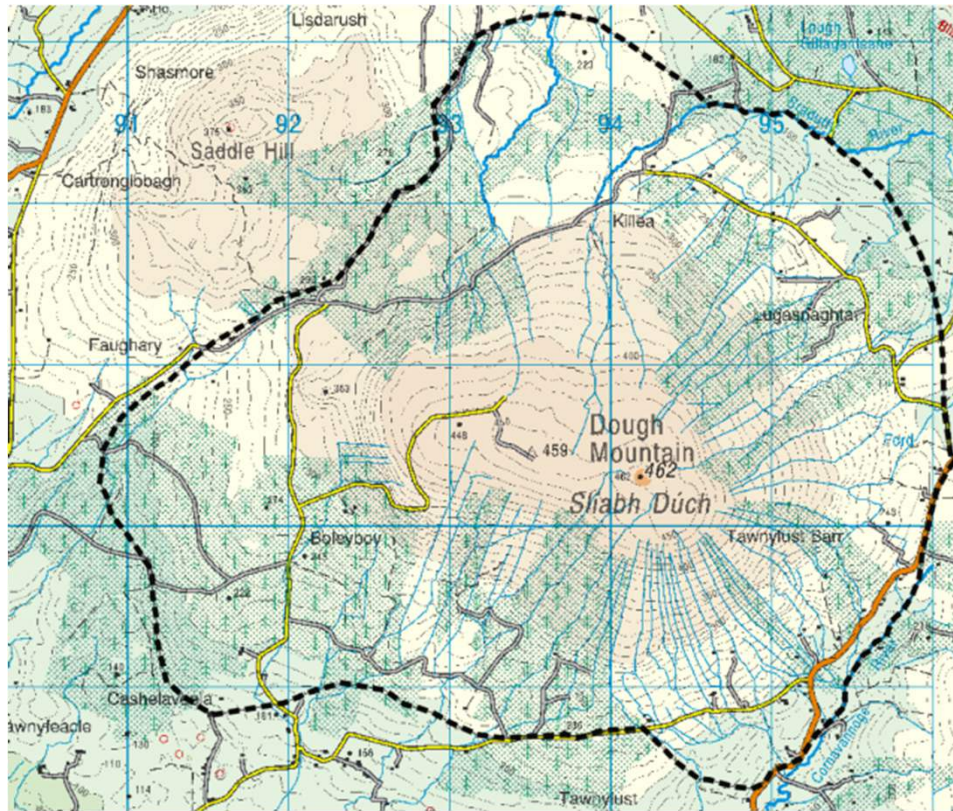
Development Plan Considerations



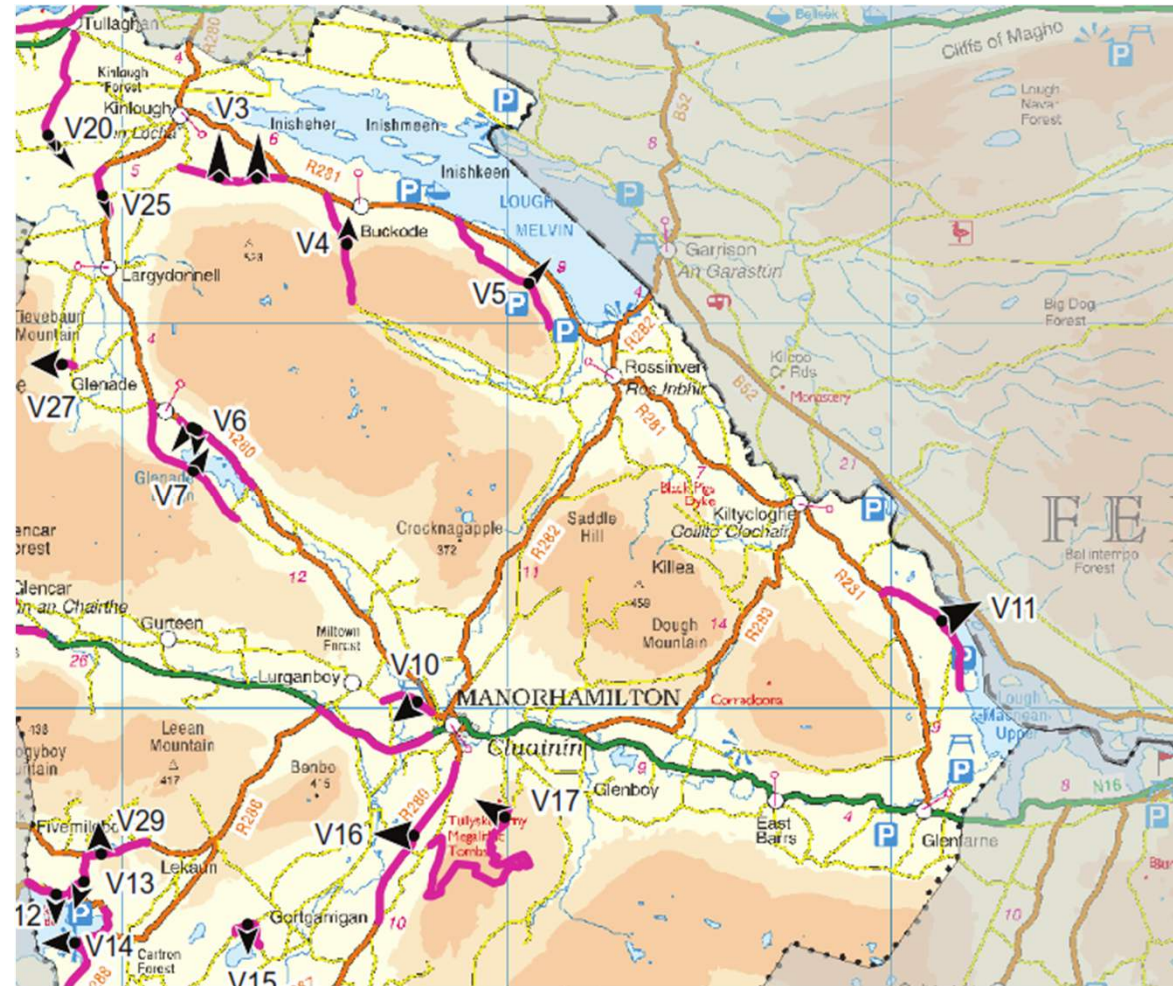
- CDP endorses the national and regional policies in terms of renewable energy development albeit to 2023
- LCC Climate Action Plan 2025-2031
- Landscape Character Assessment
- Renewable Energy Strategy
 - Available Areas
 - Landscape and Visual Capacity Study for Wind Farms and Wind Turbines



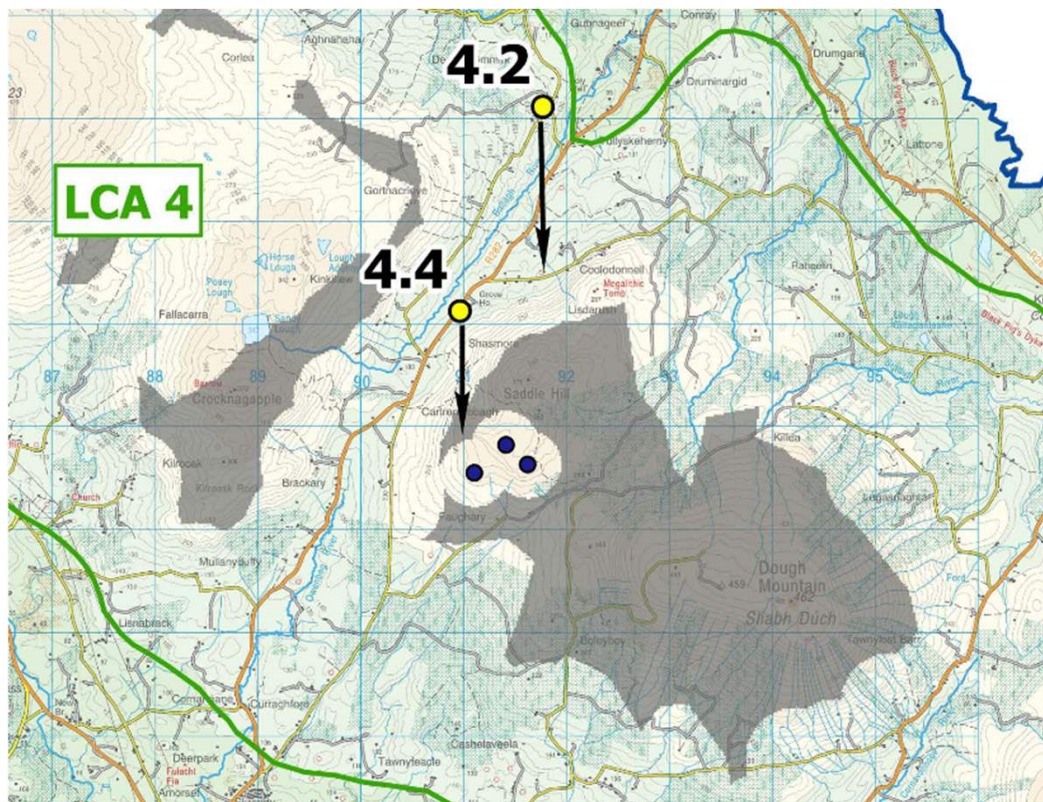
Development Plan Designations



- AHVA B3 Dough Mountain
- Protected Views & Prospects



Renewable Energy Strategy



- Sieve Analysis
- Step 1 – identified Available Areas
- Step 2 - Landscape and Visual Capacity Assessment
 - No areas where new wind turbines would be considered 'acceptable in principle'
 - *Limited capacity to accommodate future development*
- LCA 4 Aroo and Mountain Outliers
 - *The LCA overall is of some considerable scenic quality and would be highly sensitive to wind turbines. Some limited moorland areas in the vicinity of Dough Mountain and Saddle Hill may be considered subject to detailed design, having regard for landscape and visual constraints including potential cumulative effects with other wind turbines*



Considerations - Roads

- Has not considered the full extent of the impact of the proposed development on the local road infrastructure in terms of assessing bridges and culverts along the construction and delivery routes to confirm their structural carrying capacity with particular concerns expressed in relation to the structural integrity of Leminea Bridge with regard to the proposed Turbine Delivery Route;
- TTA does appear to have considered the impact on the local roads network of the proposed turbine foundation pours scheduled to occur 14 day period consisting of 460 no. movements per day;
- The impact of the proposed Borrow Pit related traffic or of forestry clearance related traffic on the local road network have not been assessed in the submitted TTA;
- Road Safety Audit has not considered in full the delivery of Abnormal Indivisible Loads as the Swept Path Analysis was not complete at that time it was prepared;



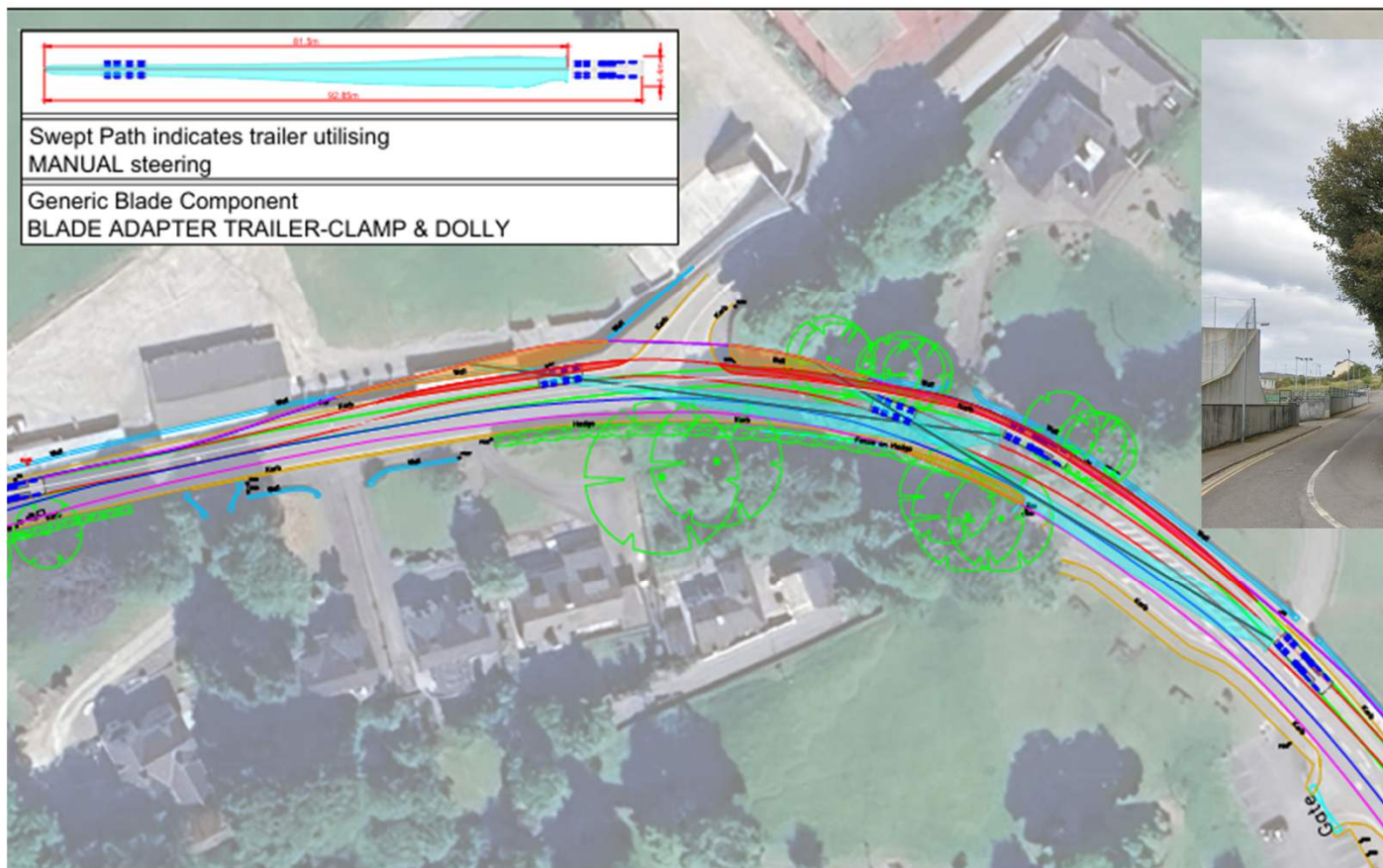
Considerations - Roads

- Measures deemed necessary in the Road Safety Audit for Permanent Site Access Location 2 and for Permanent Site Access Location 5 & 6 have not been addressed, and both proposed entrances are considered to constitute traffic hazards;
- Does not include the full extent of works required to allow the wind farm to be constructed with reference to the temporary works required for the Turbine Delivery Route and the details of the proposed construction of an 860-metre access roadway at Cherrybrook are seriously lacking in detail.



Considerations – Built Heritage

Inadequate consideration of the built heritage impacts of the Swept Path Analysis within Manorhamilton



Considerations - Peat Stability

- Submitted Peat Stability Risk Assessment
 - Insufficient regard of proximity to recorded landslide events and scree falls close to a number of turbines
 - Extent of reliance placed on standard construction practices rather than on bespoke mitigation or control measures specific to the ground conditions
 - Deferral of critical aspects of peat stability management to post-consent stages of the project,
 - Provision of comparatively limited analysis of the potential wider effects arising from cumulative excavation activities, peat excavation and storage, hydrological modification, drainage interventions, borrow pit operations and changes in groundwater conditions across the peatland system as a whole;
- DAU - The proposed design and siting of the turbines is not sufficiently cautionary and the EIA lacks sufficient evidence to support the efficacy of proposed mitigation measures during extreme dry and wet conditions as well as 'normal' conditions;

Considerations – Biodiversity & Ornithology

- Potential areas of concern / likely non-alignment with the County Leitrim Biodiversity Action Plan 2026-2031
 - Direct footprint impacts on blanket bog;
 - Hydrological risk to high value catchments;
 - Fragmentation of ecological connectivity;
 - Species risk;
 - Over reliance on mitigation rather than avoidance and risk of spread of invasive species.
- Impact of the proposed development on the hen harrier, an Annex I protected species under the EU Birds Directive and that the proposed development causes known habitat loss or functional displacement directly conflicting with national conservation policy.



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Considerations – Visual Impact

- Siting of proposed turbines 03,13 and 14 would adversely impact on the considerable visual amenity of Dough Mountain, and of Dough Mountain when viewed from other upland receptors including the adjoining Thur Mountain; in so doing the proposed development fails to adhere to the policy framework contained in the County Development Plan 2023-2029 with regard to protecting AHVA.

Photomontage



View flat at a comfortable arm's length

Considerations – Visual Impact

Photomontage

Part 1 of



View flat at a comfortable arm's length



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Recommendations & Conclusions

- At a strategic level, Leitrim County Council clearly supports wind energy development as outlined in the policy support contained in our County Development Plan informed by our Renewable Energy Strategy and Climate Action Plan.
- Renewable energy projects are recognised as providing an opportunity to reduce our dependency on non-renewable resources for energy production and contribute to achieving a greater degree of energy security than is presently the case.
- However, that broad policy support does not necessarily render all renewable energy proposals acceptable.
- The development proposal presented, whilst comprehensive and voluminous, is lacking in sufficient detail and evidence to demonstrate to the satisfaction of the Planning Authority that the scale of the proposed wind farm can be accommodated at this location with regard to the proper planning and sustainable development of the area.

Recommendations & Conclusions

- Having regard to all of the foregoing considerations, it is not considered that the proposed wind energy development can be endorsed by Leitrim County Council on the basis of the detail, analysis and justifications presented to date.
- It is recommended to the Elected Members that this report and the concerns detailed herein, be endorsed as representing Leitrim County Council's consultation response, for issue to An Coimisiún Pleanála.
- Report from the Environment Department highlights quite a significant number of inconsistencies between various aspects of the proposed development within individual chapters and between chapters. The report also outlines a series of concerns in relation to the adequacy of the submitted CEMP and that a full RWMP is required for the proposed development.



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Go raibh maith agaibh

Minutes of Leitrim County Council Special Meeting held in Áras an Chontae, Carrick-on-Shannon, Co. Leitrim on Monday 20th July 2026

Members Present: Councillor Seán McGowan
Councillor Enda McGloin
Councillor Brendan Barry
Councillor Padraig Fallon
Councillor Paddy O'Rourke
Councillor James Gilmartin
Councillor Enda Stenson
Councillor Cormac Flynn
Councillor Roisin Kenny
Councillor Eddie Mitchell
Councillor Gary Prior
Councillor Maeve Reynolds
Councillor Felim Gurn
Councillor Mary Bohan
Councillor Ita Reynolds Flynn
Councillor Paddy Farrell

Councillor Mary Bohan (Cathaoirleach) presiding

Apologies Joseph Gilhooly, Chief Executive
Councillor Justin Warnock
Councillor Irene Guckian Rabbitte

Officials Present: Mary Quinn, Deputy Chief Executive and Director of Services, Housing, Planning, Corporate Services and Transformation
Vincent Dwyer, Director of Finance, Environment, Community
David Minton, Director of Services, Economic Development, Regeneration, Sustainable Transport and Emergency Services
Bernard Greene, Senior Planner
Pio Byrnes, Senior Executive Planner
Liam Flynn, Senior Executive Planner
Adrian Kielty, Senior Engineer.
Paul McMahon, Senior Executive Engineer,
Nicola McManus, Meetings Administrator
Aoife McDermott, Assistant Staff Officer

The meeting commenced at 11.00 a.m.

MM..26 To consider the report prepared by the Chief Executive with respect to the Lissinagroagh Wind Farm Strategic Infrastructure Development application which has been lodged with An Coimisiún Pleanála pursuant to Section 37E of the Planning & Development Act 2000, as amended and to outline the views on the proposed development by the Elected Members prior to the submission of said report to the Commission.

Senior Planner, Mr. Bernard Greene, delivered a presentation to the members on the proposed Lissinagroagh Wind Farm, a Strategic Infrastructure Development (SID) / RED III application submitted directly to An Coimisiún Pleanála. This presentation is attached to the meeting record. Mr. Greene outlined the SID application process, noting that Leitrim County Council, as a prescribed body, acts as a consultee in the process and that An Coimisiún Pleanála will determine the application. Mr. Greene indicated that the members may, by resolution, make additional comments to the Chief Executive's Recommendation as outlined in their report but that the Council is not the decision-making authority / competent authority in this instance.

Mr. Greene outlined for the members that a SID proposal is a large-scale infrastructure project that sits under the provisions of Section 37A of the Planning and Development Act 2000, as amended. Categories of development are specified within the 7th Schedule of the Act – Windfarm development of more than 25 no. turbines or having a total output greater than 50MW.

The proposed development is comprised of 14 no wind turbines - blade tip height 180 - 185m, a rotor diameter 149m - 163m inclusive, a hub height 101m - 110.5m and associated infrastructure including modifications to existing site accesses, access roads, etc. with the development wrapping around the west of Dough Mountain and being 3 km from Manorhamilton and 4km from Kiltyclogher.

The rationale for the proposed site selection was noted as having min wind speeds of 6.5m/s at a height of 100 metres, >300 hectares contiguous site area, viable distance to the grid and contributes to meeting our legally binding objectives to reduce CO₂ emissions by 2030 and net zero no later than 2050 with each turbine producing between 5.5-7.2 MW of energy.

Mr. Greene outlined the key considerations for the Planning Authority including roads, built heritage, peat stability, biodiversity and ornithology and visual impact. He further outlined the Chief Executive's report in terms of the recommendations and conclusions having regard to the Leitrim County Development Plan 2023-2029 and it's associated Renewable Energy Strategy, the Leitrim County Council Climate Action Plan 2025-2031, the Regional Spatial and Economic Strategy and the National Planning Framework.

He further indicated that there are a number of areas of considerable concern for the Planning Authority with regard to the adequacy of the documentation submitted to the Commission which would allow for a positive decision to be made on the proposed Lissinagroagh Wind Farm. The development proposal presented, whilst comprehensive and voluminous, is lacking in sufficient detail and evidence to demonstrate to the satisfaction of the Planning Authority that the scale of the proposed wind farm can be accommodated at this location with regard to the proper planning and sustainable development of the area.

An Cathaoirleach, Councillor Mary Bohan, thanked Mr. Greene for the presentation and acknowledged the significant work that has gone into the report. The Cathaoirleach invited members to raise any questions they might have in relation to the SID, following this she indicated the any potential resolutions could then be discussed.

Members discussed the following:

- The ability of the roads infrastructure in the area to cater for the delivery of the size of the blades to the wind farm site with discussions ensuing in relation to the turbine delivery route previously for Faughary Wind Farm. The assessment on the roads infrastructure wasn't adequate to give clarity on whether or not the current roads structure is sufficient to cater for the potential loads when bringing blades, etc. to the site.
- The extent of references to '*mitigation*' in the submitted EIAR exceeded 3,000 no. with the impact on biodiversity requiring a trade off by compensation rather than avoidance of the impact as outlined in the report prepared by the Biodiversity Officer.
- Individual councillors in the Manorhamilton Municipal District had made individual submissions to the Commission.
- The extent of effort and work undertaken by the Save Dough Mountain Group, a voluntary organisation, was noted and commended by all.
- Clarification was requested in relation to the Completeness Check referenced in the Chief Executive's report.
- The previous refusal of planning permission for a wind farm on Dough Mountain was outlined and a lack of understanding how the current proposal could seek to overcome the previous reasons for refusal. This was supported by reference to the DAU submission. The members were not satisfied that the EIAR had successfully overcome such issues.
- The view was expressed that Co. Leitrim has already accommodated a number of wind farms articulating the view that we have already shouldered this county's responsibility for renewable energy.
- Clarification of what happens after the 35 year operational phase of the Wind Farm.
- Clarification on the scale of the actual foundations and hard standings for each turbine.
- Concerns raised about the scale of the excavations and the potential for landslides. The west coast was considered to be the best location for wind farms of this scale.
- The visual impact of the proposed wind farm on the sensitive scenic area and the impact of the wind farm residents of the area.
- An unacceptance of the assessment of the effect of the proposed development on the karst geology of the area and the expected impact of the development on the hydrogeology of the area.
- Disagreement with the manner in which the view of the Biodiversity Officer was not accepted in the report by the Chief Executive.

The Senior Planner in response outlined

- The Commission had replied to the Senior Planner's enquiry in relation to the completeness check. There was no report undertaken but rather a check by the

inspectorate that the various reports and matters to be included in the application as outlined by the Commission when confirming the proposal was a SID project had been included in the application. This appeared to be a check list rather than any qualitative assessment of what had been submitted.

- No structural assessment of the existing roads and bridges for haul routes and turbine delivery routes had been requested by the Commission and alarmingly such a requirement has been included in decisions by the Commission for wind farm developments by condition.
- The RED III provisions allow for fast tracking of consent for SID applications which are renewable energy proposals with the Commission having one year to deal with such applications which wasn't previously the case.
- After the 35-year operational phase, the existing turbines would be decommissioned and removed off site with the extensive hard standings and foundations along with access roads and 110kv substation remaining in place.
- The scale of the turbine foundations is 4 metres deep with a radius of 14 metres.
- The Planning Authority takes all of the views expressed by individual departments into account and makes an informed assessment. It is accepted that there is an energy crisis as well as a biodiversity crisis and reference to the RED III Directive was in relation to renewable energy projects being presumed to meet the threshold for IROPI. In so doing, the EU are deciding that such energy considerations are seen to trump biodiversity considerations moving towards compensation rather than avoidance. This is the point which the Chief Executive's report was making. The view of the Biodiversity Officer was included, supported by the DAU, in the final conclusions and recommendations.
- For the country to meet their targets for reduction in greenhouse gas emissions and renewable energy generation, the existing level of on shore wind energy electricity generation has to more than double by 2030. The existing wind energy developments are located in less sensitive sites from a landscape and visual impact perspective along with ecological sensitivity. To meet our targets will require such developments having to be located in more sensitive sites than in the past.

The Cathaoirleach thanked the members for raising the issues and informed the members that a submission had been received from Councillor Irene Guckian Rabbitte who has sent her apologies. The Cathaoirleach acknowledged the submission and members agreed to note and add it to the record of the meeting.

Mr. Greene thanked the members for their contributions and asked if they wish to put forward any resolutions to the CE's report. The following were then proposed:

Resolution 1

The Council does not agree that the proposed windfarm is compliant with LCA POL 1 which seeks *"To conserve and enhance the high nature conservation value of the Landscape Character Areas in order to create/protect ecologically resilient and varied landscapes"* because we believe that the project as proposed will have a significant negative effect on the high nature

conservation value of the Dough Mountain Landscape and compromise an otherwise ecologically resilient and varied landscape.

On the **PROPOSAL** of Councillor Eddie Mitchel and **SECONDED** by Councillor James Gilarmatin Resolution 1 was passed and will be addended to the Chief Executive's Report for submission to An Coimisiún Pleanála.

Resolution 2

The Council does not accept that the carbon sink associated with existing peatland on site is degraded to the extent as indicated by the applicant in the submitted EIAR. The submitted application does not consider the overall carbon footprint of the loss and relocation associated with peatland removal, drainage and risk of slippage. The Commission must fully satisfy itself that the overall impact of the proposed development on climate and peatland is fully considered in their assessment.

On the **PROPOSAL** of Councillor Felim Gurn and **SECONDED** by Councillor Padraig Fallon resolution 2 was passed and will be addended to the Chief Executive's Report for submission to An Coimisiún Pleanála.

Resolution 3

On the basis of information submitted, the Elected Members do not consider that the submitted assessments adequately satisfy the Council so that it can rely on mitigation alone to protect the 2 Special Areas of Conservation hydrologically linked to the proposal, namely Lough Melvin and Lough Gill.

On the **PROPOSAL** of Councillor Sean Mc Gowan and **SECONDED** by Councillor Ita Reynolds Flynn resolution 3 was passed and will be addended to the Chief Executive's Report for submission to An Coimisiún Pleanála.

Resolution 4

The Elected Members fully endorse the report made by the Biodiversity Officer and acknowledge the importance of biodiversity. There must be no loss associated from the proposed development to the habitat of known breeding hen harriers.

On the **PROPOSAL** of Councillor Ita Reynolds Flynn and **SECONDED** by Councillor Enda Stenson resolution 4 was passed and will be addended to the Chief Executive's Report for submission to An Coimisiún Pleanála.

Resolution 5

The Elected Members would request that An Coimisiún Pleanála to fully satisfy themselves that the reasons for the previous refusal of planning permission for a wind farm application further up the slopes of Dough Mountain have been overcome in the submitted application including visual impact, slope instability and the potential risks of landslide.

On the **PROPOSAL** of Councillor Gary Prior and **SECONDED** by Councillor Felim Gurn resolution 5 was passed and will be addended to the Chief Executive's Report for submission to An Coimisiún Pleanála.

With the exception of the matters included in the Resolutions, the Members agreed with the recommendations and conclusions contained in the Chief Executive's report.

On the **PROPOSAL** of Councillor Felim Gurn and **SECONDED** by Councillor James Gilmartin the Members endorsed the recommendations of the Chief Executive Report with the exception of the matters included in Resolutions 1 -5.

On the **PROPOSAL** of Councillor Eddie Mitchell and **SECONDED** by Councillor James Gilmartin the Members endorsed the Submission made to An Coimisiún Pleanála by the Dough Wind Farm Group.

Mr. Greene thanked the members for all their input. He advised that the Chief Executive's report will now be submitted along with resolutions 1-5 as approved to An Coimisiún Pleanála. All of the submissions received by the Commission will then be forwarded to the applicants for their response. He noted the Coimisiún may issue a decision or have the provision to request further information which could include requesting a revised EIAR. They must work within the condensed timeframes provided by RED III.

This concluded the business of the meeting at 1.30pm.



Nicola McManus
Meetings Administrator

Date: 21st July 2026

To whom it concerns,

Monday 20th July 2026

(Leitrim County Council, Special Meeting)

Please see my comments on the proposed 14 turbine windfarm by FuturEnergy Lissinagroagh Designated Activity Company, Strategic Infrastructure Development/ Red III Application, Dough Mountain, Co. Leitrim.

I have huge concerns regarding this proposal. I reject the proposed wind farm based on concerns expressed in the C.E. submission and primarily to protect the visual amenity, ecology, water quality, upland peat bog, biodiversity, tourism and local quality of life for the people residing in the area.

I believe that the application for the wind turbines should be kept separate from the 110 kv substation.

I would be concerned about the site's proximity to the towns of Kiltyclogher which is 4km away and Manorhamilton 3km from the proposed site. These are two historical towns with many archaeological features. The increase in traffic as part of construction and commissioning may have adverse effects on these towns.

Has consultation been carried out with neighbouring councils such as Sligo, Fermanagh and Cavan Councils due to the site's proximity to these neighbouring counties and the risks they would face, especially regarding water and water sources?

Has the applicant carried out consultations with people of the area to their satisfaction?

Water

I would have major concerns on this project's location. There are a number of water bodies such as the Rosfriar and the Lattone which are currently showing good status under the 3rd River Basin District shown on the 'catchment.ie' website. Ireland must continue to ensure all waterbodies are good or excellent. This project will increase the risk of contamination of groundwater. The site comes within 200 metres of the Lough Gill SAC. In fact, there are several SACs in the vicinity i.e. Arro Mountain Sac and Lough Melvin SAC. Lough Melvin and Lough Gill have qualifying interests such as salmon, otters, and in the latter the freshwater crayfish and lampreys which are also at risk. It is also my understanding that there are approximately 76 karst features in the area.

The soil in the area is a mix of peatland and thin soils. Therefore, there is a high groundwater vulnerability. It is my understating that the applicants plan to carry out a number of water crossings thereby further increasing the risk to the waterbodies and to the disturbance of the surrounding soils and general area.

The local communities in Leitrim, Sligo, Fermanagh and Cavan rely heavily on water in this area. Lough Gill is the source of potable water for Sligo Town. This project will increase the risk of contamination of this water source.

Noise

The nearest dwelling is reported as 763 metres away. The whooshing should would be a concern. The vibrational pitch and frequency is intrusive and cannot be tuned out easily. Has vibrational and tonal analysis, plus background noise monitoring, being considered as part of this project?

Wind Turbine height

The applicant isn't conclusive with the height of the turbine. The nearby 3 turbines at Faughary are roughly 119 metres in height. The proposed 14 will be roughly 185 metres high. The applicant isn't accurate with their proposal. This represents close to doubling of height of the existing 3 turbines. Questions regarding asbestos coating and toxic paint coating, on blades in particular, have been raised in other countries, and where is the specific Asbestos Management Plan for this site should this windfarm be decommissioned in future years or the blades or other parts need to be replaced or upgraded? Have the shadow flicker concerns been addressed?

The applicant mentions that they're proposing a "limited" number of wind turbines. I wouldn't agree that limited would equate to 14? This is a contradiction in itself.

Landscape

North Leitrim and tourist efforts would be undermined by this proposed 14 wind turbines. The landscape character of Saddle Mountain and Dough Mountain would be reduced by this application. I find it hard to believe that there are a number of restricted views around the site but not at the site for the application.

Soil:

The soil in the area consists of a large number of karstified features, peaty soil and poor soil such as gleys. The area has been forested and would be weak. The presence of large turbines would increase the risk of landslides. I understand that there have been a number of landslides in the area in the last few years. Nobody wants another Derrybrien or Dawn of Hope ecological disaster! Also add to this, the risk, during the construction phase, of the release of peat particles and an increase in PH levels, in salmonid waters such as Lough Melvin, resulting in fish kills.

Biodiversity

The Hen harrier has been spotted in the area, and many conservation works are ongoing to improve its numbers in the area. The siting of these turbines will reduce its feeding and breeding grounds and run contrary to the efforts of Leitrim County Council's Biodiversity plan.

The flight pathways for bat species, and birds such as swans and geese, would be hampered by these turbines. I would also be concerned about the destruction of hedgerows and the spread of invasive species Rhodendron, Japanese Knotweed, Himalayan Balsam and American Mink.

Roads

The proposal to bring trucks carrying turbines through Manorhamilton town would mean that on certain days parking would have to be restricted thereby having a negative economic effect on business in the town.

The weight of these trucks and their loads would have a huge effect on local roads, buildings and other structures. Does the applicant propose to pay for the strengthening of local roads and any damage that may arise due to excess truck movements? This cost may fall back on a hard-pressed Leitrim County Council. The reports mention a 4.4m truck width versus roads that are 3m wide and contain a large number of twists and turns. There is also an old bridge at Leminea which may not be able to take the weight of said movements. I believe that the path analysis reports are lacking. In summary the road network structure is inadequate to cater for the movement of wind turbine equipment prior to installation and all the associated traffic afterwards. Have road safety audits been undertaken at the various sites?

Borrow Pits

These are a concern as they will be used for storing waste and removal of soil for the various sites. Has there been a Resource Waste Management Plan submitted and proper permitting of sites and vehicles? I would have concerns regarding waste concrete and refuelling measures and how they would affect the groundwater and aquifers at the site.

Is there a need for this capacity

By 2030 Ireland to have 9 GW of inland power from Wind. What capacity is this currently at? The Oweninny site at Bellacorrick in Mayo and a number of other applications in Connaught and Ulster may fill this gap.

Conclusion

My overriding feeling is that this application is testing the waters. There isn't enough accurate information on the turbine height; not enough noise surveys - what tonal and impulsive noise there would be; it poses a huge risk to groundwaters- there is a high risk to Lough Gill due to hydro connectivity of smaller rivers to this SAC; concerns about the feeding grounds of the hen harrier and the efforts to increase its presence (This project is contrary to conservation projects) along with the conservation of the sand martin and the white-tailed eagle; the width of local roads vs width of trucks 3m vs 4.4m, risk of damage to local roads, structures and buildings and any repairs falling back on Leitrim County Council; damage/loss to businesses in Manorhamilton, tourism reduction, reduction in scenic viewing in the area; shadow flicker concerns; impact on local people/ farmers and their lives and livestock etc.

In conclusion, there are more questions than answers. I cannot, in good conscience, support this windfarm application. This area, this site, is not suitable for this development. Once done it cannot be undone and as such, considerable care is warranted.