



Planning Ref: PAX12.324290

10 July 2026

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1
D01 V90

Dear Sir/Madam

RE: PAX12.324290 - 10-year planning permission for Lissinagroagh Wind Farm consisting of 14 no. wind turbines and all associated infrastructure AT townlands of Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shashmore, Tawnyfeacle and Tullysheherny, County Leitrim.

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

Cultural Heritage

The Heritage Council's firm position is that the location of development, as well as the site layout and design of schemes, should be informed by the environmental constraints and heritage sensitivities. Following a review of the Landscape and Visual Chapter and the Cultural Heritage Chapter, we have considerable concern regarding the siting of Turbine T03.

The Department of Housing, Local Government and Heritage highlighted that the proposed project site may be located within a prehistoric landscape. This comprises megalithic tombs and other ceremonial and ritual type prehistoric monuments, located at Lisdarush, Shashmore (Straddle Hill), Kilroosk (Crocknagapple), and Tullysheherny. In a general sense this landscape includes areas to the north and west of the development site, with Kilroosk (LE007-010) having a clear visual connection with Shashmore/Straddle Hill at a similar elevation in an east-west direction.

The EIAR has rightly discussed this landscape in its assessment of impacts. It has also rightly pointed out that Turbine T03 is in a prominent position and is likely to be visible from all directions (See 14.3.11.1). There is also potential for other archaeological features in the area around this turbine. Turbine T03 is located within 146metres of a ring cairn and cist (LE008-006001 and LE008-

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006002), logged as AH01 in the EIAR, and the reporting has correctly stated that there is higher potential for sub-surface archaeological remains in this area.

The Heritage Council acknowledges that while many of the monuments are located to the north/northwest of the development site, there is a strong visual westward connection between Kilroosk (Croknagapple Hill) Barrow (LE007-010), logged AH110 in the EIAR and the ring cairn and cist on Saddle Hill. The construction of Turbine T03 and the associated hardstanding, when considered alongside its prominence at this location, will undoubtedly disrupt the sightlines between the barrow monument at Kilroosk (Croknagapple) and the Cairn and Cist at Straddle Hill. The significance of effect on the setting of the monument at Straddle Hill (AH01) is deemed *moderate indirect negative*. The significance of effect on the corresponding monument at Croknagapple (AH110) is also *moderate indirect* (see section 14.4.4 and also Appendix 14.6).

In general terms, the Heritage Council recommend that this turbine needs to be removed from this location with the primary consideration being the setting of the cairn and cist monument, and its corresponding visual relationship with the barrow on Croknagapple.

We would also point out that the EIAR needs to capture effects in combination. Both AH110 and AH01 have been assessed as experiencing a *moderate indirect* effect. Given that the visual connection between the two monuments is critical to their understanding, a moderate negative effect on both should be considered significant.

We would also point out, with due regard to Table 14-5 that a 'medium' magnitude effect on a 'high' sensitivity receptor should not be confined to 'moderate' significance. In this case, we believe that when the visual connection between both monuments is considered, that there is a higher significance of effect in EIAR terms, and this justifies the removal of Turbine T03.

ARCH OBJ 2 of the adopted Leitrim Development Plan 2023-2029 seeks 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.

Currently, we do not believe that the proposal complies with this policy, due the siting of Turbine T03.

We have also reviewed the Landscape and Visual Chapter. In this case the development is located with Landscape Character Area 4 LCA 4 Arrro and Mountain Outliers. The *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* in the adopted Leitrim Development Plan has noted that this LCA is of some considerable scenic quality and would be **highly sensitive** to wind turbines. **Our emphasis.**

Therefore, we question the 'medium' sensitivity judgement given to the study area, while acknowledging that the Capacity Study also states, "*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*".

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With regards to this final point, we believe the prehistoric landscape and the connections between the summit monuments is one such important constraint that should inform design of any wind farm proposals in this LCA.

Ecology

With respect to large spatial proposals, we concentrate primarily on the retention of existing habitats both within and outside the development site, as opposed to biodiversity enhancement measures. Whilst the latter is welcome as a mitigation measure, the emphasis should be on retaining important habitats that already exist.

We observe in the reporting with this application, and the NPWS's Article 17 reporting that there are several Annex I habitats on site. This includes 7130 Blanket bog (inactive and active), 4030 Dry Heath, and 8240 Limestone Pavement.

0.89 hectares of cutover bog (PB4) habitat which corresponds to Annex I habitat type 7130 Blanket bog (inactive) will be lost (section 5.6.2.3.2). Incidentally, this is the result of Turbine T03, the construction of which will see a direct loss of this habitat. This has resulted in an EIAR assessment of *negative, permanent, irreversible, likely significant effect* at local geographic scale on this habitat. The construction of Turbine T03, along with others (T4 and T10) will also affect the hydrological regime associated with this habitat, and results in a further indirect degradation of 1.65ha of cutover bog (PB4) (Section 5.6.2.3.2.2). Even with mitigation, the reporting concluded potential for *significant residual effects* at a local geographic scale (Section 5.6.2.3.2.9).

In addition, section 5.6.2.3.17.1 notes that 0.55 hectares of upland blanket bog (PB2), which also is identified as corresponding to Annex 1 habitat type 7130, will be lost to the construction of Turbine T03. Again, impacts arising from the construction of T03 and T04 on the wider hydrology is estimated to result in the potential further degradation of 2.64 hectares of this habitat.

With regards to dry siliceous heath (HH1)/dry humid acid grassland (GS3), which corresponds to Annex I habitat type European dry heaths, a total of 0.45ha of the total mosaic will be lost, again due to of the proposed construction of Turbine T03. The EIAR notes that this habitat loss represents a significant portion of the total 1.48ha of the habitat identified within the survey area for the proposed wind farm site. The reporting summarises a potential for significant residual effects at a local geographic scale for this habitat.

The final Annex 1 habitat type is exposed calcareous rock (ER2) corresponding to the priority Annex I habitat type 8240* limestone pavements. A small area of this will be lost due to the access track construction for Turbine T03.

In general terms, the Heritage Council does not support the loss of Annex I habitat. Recent Article 17 Reporting has noted that a significant amount of such habitats are not in favourable condition. The loss of bog habitats in particular may negate the benefits for renewables in terms of a carbon savings balance. In this case, we believe that the location of one of the turbines (T03) is particularly impactful.

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Section 11.5 of the adopted Leitrim County Development Plan 2023-2029 places strong emphasis for biodiversity outside of designated sites. NHPOL6 seeks 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”*.

While Policy NH POL 7 seeks 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”*.

While there are varying impacts on habitats from this application, the location of Turbine T03 is particularly egregious, and its current siting location does not comply with the named biodiversity policies from the adopted Leitrim County Development Plan 2023-2029.

Conclusion.

It is clear to the Heritage Council that the decision to include Turbine T03 is ill conceived and is contrary to the principle of an environmental constraints led approach to siting and design. This specific turbine location will result, in our view, a significant negative effect on an important archaeological landscape, by virtue of the disruption to sightlines between corresponding monuments, while also resulting in significant negative effects on several Annex I habitats. It is clear that this turbine needs to be removed from the scheme design for its combined negative effects on both cultural and natural heritage receptors.

I trust this observation will aid the commission in its determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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