

## Save Dough Mountain Group

### Submission to Leitrim Draft County Development Plan 2023-2029

Thank you for the opportunity to submit our views on the Leitrim Draft County Development Plan 2023-2029 (hereafter referred to as “the Plan”).

We wish to comment on the Tourism and Wind Generation sections of the plan.

#### Section 5 - Tourism

Tourism is the second biggest employer in the country so this sector is of huge benefit to a county like Leitrim.

Several sections of the Plan refer to the importance of the landscape. The **Strategic Pillar** cites "All investment decisions in product/infrastructure capitalise on, but protect, Leitrim's natural and built assets that give Leitrim a lead within competitive set." All of this, we feel, is negated by monoculture plantations, mining exploration licences and onshore wind farm development on the very hills and waterways that are our tourism offering.

**Tourism Objective 3** should include a reference to Leitrim's Dark Skies status in relation to the feasibility study on Sliabh An Iarainn and North Leitrim as national parks. This dark sky status has been very successful in Mayo and Kerry in the establishment of their national parks. In relation to Dough mountain, there currently exist fantastic cycling routes (it is part of the Leitrim Glens Sportive route) with cycling signage, the only of its type in Ireland in place and further cycling signage to be erected as part of the Recreation Forum development.

There are also walking routes on Dough Mountain with many suitable for dogs in daily use. This could be developed as a recreation area and be of health and economic benefit to the area. Fáilte Ireland statistics show that the main reason visitors cite for visiting Ireland is the unspoiled landscape and 50% of visitors to the country take part in outdoor activities with walking being the main one.

Under **Adventure Tourism**, again it refers to scenic beauty, serene environment and natural heritage and habitat value. This goes on to talk about reanimating the angling sector in Leitrim. Under Policies on this section;

- **Tourism Policy 1 & 3** refer to water quality and sensitive development . They don't mention the major issue in our lakes with blue green algal bloom (cyano scum) which is highly dangerous and likely caused by intensive agriculture and forestry run off. Several lakes were closed last year to swimmers because of this so mitigating that needs to be added as an objective. At a time when water based activities are a growth area, this is a hugely important resource for tourism and locals alike.
- **Tourism Objective 2** states the development of hostels along hiking routes. Hostels, following the pandemic, may not be considered a safe option for walkers so a different type of budget accommodation might be more suitable.
- **Adventure Tourism Policy 3** states; to maintain water quality and develop facilities at designated water bathing sites, again not referencing the current pollution problems.

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- **Tourism Objective 5** talks about development of new tourism products & facilities but we need 'experiences' similar to Fermanagh who are developing very much 'cottage experiences' such as storytelling, crafts etc. This brings much needed income to very remote areas and preserves our cultural heritage.

We also need to add an objective for additional beds in the county. They have always been scarce at certain times of the year, therefore we need to increase tourist beds numbers asap.

### Section 12.6 - Climate Action

There are serious contradictions in **Subsection 12.6.2 Wind Energy** and the objectives are directly at odds with the objectives referred to in Section 5 - Tourism.

In relation to the capacity study as reported in Figure 12.4 in the Plan, 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. On the page following Figure 12.4 in the Plan, it refers to the fact that the Renewable Energy Strategy (**RES0**) has identified the potential for Leitrim to increase its wind energy operational capacity by 90%

There is only one objective in the plan for wind energy and it doesn't mention **offshore wind generation**.

- Looking at the wind speeds off the Sligo, Leitrim & Donegal coasts, the objective should be to develop offshore wind generation. The NW has the highest wind speeds off the coast in the country and huge progress has been made in recent months on the technology for off shore wind generation which is much more efficient than onshore.
- In tandem with the development of technology for offshore wind should be factors to mitigate damage to marine and bird life.
- Further development of onshore wind farms in Leitrim would work against the measures to mitigate loss of biodiversity.
- The wind farms are of no benefit to the local community in job creation or reduction of energy costs.
- On shore wind farms on the typical geology of the Leitrim hills can cause serious landslides with devastating effects on biodiversity, water quality and communities.
- The proximity of **Dough Mountain** to Lough Melvin Special Area of Conservation (SAC) is of huge concern. Dough Mountain has recently, under a 2020 geology study been nominated as an **National Heritage Area of geological importance**. The salmon and trout species in Lough Melvin which gives it its unique status needs the utmost protection.
- The danger of landslides and the inevitable runoff of silt and suspended solids during wind farm construction into the spawning grounds (feeder streams from Dough Mountain into the Lough Melvin Catchment) could spell disaster for the rare fish species in Lough Melvin.

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- Part of Dough Mountain drains towards the **Bonet/Lough Gill Water Catchment/SAC** which is also a major concern regarding biodiversity, water quality and drinking water quality for human consumption.

#### Conclusion

There is a strong need and will within the county to develop our nature based tourism industry and that is in keeping with the focus of Ireland's Hidden Heartlands and the Slow Adventure offering in Leitrim. The need for a pristine, pleasing landscape is fundamental to that offering. The further development of onshore wind farms and monoculture forestry will prevent that development.

This highly incentivised onshore wind industry, using taxpayers money is very damaging to the lives and businesses of those taxpayers and detrimental to biodiversity. There are also a lot of unanswered questions in relation to the sustainability of this energy heavy industry at manufacture and installation stage, the life span of the turbines and the fact that as yet the redundant turbines are not recyclable.

The outdated Wind Energy Guidelines (2006) together with the Draft Wind energy Guidelines (2019) offer no protection to communities, farms, businesses, landscape or waterways. These were developed when turbine sizes were significantly smaller, not the 185m/600 feet size (much higher than the Dublin spire) currently proposed in Leitrim.

A recent CSO statistical publication of 20 January 2022 reported that Electricity consumption by data centres increased by 144% between 2015 and 2020.

Currently data centres account for 15% of the country's energy usage, this is estimated to be 24% by 2030.

None of these data centres are based in the North West yet, Leitrim alone is home to 103 turbines with no advantage to the local community, no employment or no reduction in energy costs. The rates paid to local authorities together with the grants to the industry is really squeezing those communities between two unfair disadvantages.

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Submitted by;

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