

Submission of Objection
Proposed Lemanaghan Wind Farm
Case Reference: PAX19.324161

To: An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Re: Proposed Lemanaghan Wind Farm development — application by Lemanaghan Wind Farm DAC (a joint venture of Bord na Móna and SSE Renewables) for a 15-turbine wind farm and associated 220 kV substation and works on Lemanaghan Bog, Co. Offaly.

Submitter: Anthony Phelan Sr.
Address: Kilnagarna, Co. Offaly

Eircode: N37 XY71
Date: 25-05-2026

Dear Sir / Madam,

I wish to express my strong opposition to the proposed wind farm development at Lemanaghan Bog, Co. Offaly. I have been born and reared in this area and have lived here all my life, in the townland of Kilnagarna, which lies in the landscape surrounding Lemanaghan Bog. I am writing to formally object to the planning proposals lodged by Lemanaghan Wind Farm DAC under Case Reference PAX19.324161.

My grounds of objection are set out below.

1. Lifelong connection to the area

I was born and reared in Kilnagarna and have lived in this area my entire life. My children were reared here, and they in turn are now raising their own young families within the same locality. Several generations of my family have known and loved this landscape, and I write not as a passing observer but as someone whose family roots are tied to this place. The land around Lemanaghan Bog is one of the last places of quiet and calm wilderness left in the Midlands.

2. Quality of life and the peaceful character of the area

Quality of life in Kilnagarna and the wider Lemanaghan area is good. The area is peaceful, quiet, and offers an everyday tranquillity that has become increasingly rare. From here one can look across Lemanaghan bog and see the Slieve Bloom Mountains — beautiful scenery that would be permanently disfigured by the introduction of 15 industrial-scale turbines. The peace and tranquillity that this landscape brings to me on a daily basis is something I value deeply, and once it is gone it cannot be restored.

3. Visual impact and inconsistency in planning policy

The proposed turbines would each stand approximately 220 metres tall to blade tip, with a hub height of 145 metres and blade length of 75 metres. To put this in context, 220 metres is significantly higher than the Spire of Dublin (120 metres). Fifteen structures of this scale would dominate the skyline of an otherwise flat, open midland landscape and be visible from many kilometres in every direction. Turbines of this scale are not pleasant on the eye and would fundamentally change the character of the area from a quiet rural landscape to one defined by industrial infrastructure. In addition, the proposed 220 kV GIS substation building would stand at 22 metres in height — a structure of that scale and industrial character is wholly out of keeping with the rural landscape it would occupy.

I wish to draw particular attention to a serious and material inconsistency in planning policy. My son was refused planning permission to build a single two-storey family home in this area (Offaly County Council Planning Authority Case Reference 17467; An Bord Pleanála / An Coimisiún Pleanála Case Reference PL19.301833). The reason given on appeal was, in summary, as follows:

“It [was] considered that the proposed development, because of its scale, height and massing, site layout and siting on an undulating and prominent site on approach to Lemanaghan from the south, would be a visually discordant feature in the rural landscape, [would] adversely affect the character and setting of the monastic site to the north, and accordingly would seriously injure the visual amenities of the area and detract from its rural and vernacular character, and would therefore be contrary to the proper planning and sustainable development of the area.”

I respectfully invite the Commission to read that refusal back against the proposal now before it, and to consider each ground in turn:

- **Scale, height and massing** — a single two-storey dwelling is in the order of 8 metres. The proposed development comprises 15 turbines, each at a tip height of approximately 220 metres, together with a 22-metre substation building.
- **Siting on a prominent site on approach to Lemanaghan** — the proposed wind farm extends across approximately 1,200 hectares and would be visible on every approach to Lemanaghan, from every direction, for many kilometres.
- **Visually discordant feature in the rural landscape** — 15 industrial turbines of approximately 220 metres in height in an otherwise flat, open midland landscape cannot reasonably be characterised as anything other than visually discordant.
- **Adversely affect the character and setting of the monastic site to the north** — this is the very point this objection turns on. The significance of that setting has been further underlined by the discovery in 2025 of previously unknown human burials at St Mella’s Cell, radiocarbon-dated to within decades of St Manchán himself.
- **Seriously injure the visual amenities of the area and detract from its rural and vernacular character** — if a single dwelling on this land was held to do so, then 15

turbines of 220 metres and a 22-metre substation building do so by orders of magnitude.

- **Contrary to the proper planning and sustainable development of the area** — for the reasons set out above, and for the further reasons set out elsewhere in this submission.

If the Commission's own settled reasoning was that a single two-storey family home in this landscape was contrary to the proper planning and sustainable development of the area, then granting permission for the proposed development would be inconsistent in principle with that decision. I respectfully ask the Commission to consider the two decisions side by side, and to apply its reasoning consistently.

4. Shadow flicker

Shadow flicker arising from the rotation of large turbine blades in front of the sun is a recognised nuisance impact on residential amenity, on livestock, and on the working environment of farmers. With 15 turbines of 220 metres tip height and 75-metre blade length, the area within which shadow flicker can occur is substantial, and the impact extends well beyond any nominal exclusion contour drawn on a map. Long, flickering shadows passing across kitchens, yards, fields and cattle sheds for periods of the day, on multiple days through the year, would represent a serious diminution of quality of life and of the amenity of working farmland. I do not consider that the application adequately addresses the cumulative shadow-flicker impact across the network of homes and farms that ring the bog, nor the impact on grazing stock that cannot be removed from affected fields.

5. Impact on livestock and farming

I keep a herd of cattle on land in the area. I am very concerned about the impact of construction works, ground disturbance, vibration, noise, low-frequency sound and the long-term operational presence of turbines on the welfare of my animals and on the viability of farming this land. Construction traffic on rural roads not built for that scale of plant, and the multi-year disturbance of a major construction site adjacent to grazing land, raise practical concerns that I do not believe the application adequately addresses.

6. Hydrological impact on surrounding farmland

Lemanaghan Bog is a peatland surrounded by farmland, and any major construction in a peat landscape carries significant hydrological risk to neighbouring lands. Turbine foundations, crane hardstands, access roads, cable trenches and substation works in peat all require excavation, dewatering, and the management of large volumes of water. Changes to the drainage of the bog can alter local water tables on adjoining farmland, leading to either waterlogging or unintended drying of agricultural land, with consequences for grazing, silage, animal health and farm infrastructure (including drains, wells and septic systems). Peat disturbance also risks the discharge of suspended peat and sediment into local watercourses, with potential impacts on water quality, fisheries and downstream landowners. The risk of peat instability and peat slide on bog construction sites is well documented in Ireland, and any such event would be borne directly by surrounding landowners. I am not satisfied that the

Environmental Impact Assessment Report adequately addresses these risks at the scale of individual neighbouring farms.

7. Wildlife, biodiversity and protected species

The bog and surrounding landscape support an extraordinary variety of wildlife and act as a vital corridor for species moving across the Midlands. On my daily walks down near the bog I regularly hear red-listed bird species. The introduction of 15 large turbines, with associated access roads, hard standings, cabling and drainage, will fragment habitat, introduce noise and lighting where there is currently none, and put bird populations at risk through collision and displacement. The cumulative impact on biodiversity, including on red- and amber-listed species of conservation concern, has not in my view been adequately assessed.

8. The regenerating bog and climate considerations

Since the cessation of peat production, Lemanaghan Bog has begun to regenerate. In a few short years the transformation has been remarkable: vegetation has returned, hydrology is recovering, and wildlife has come back. Active and rewetting peatlands are now recognised as critically important habitats for both biodiversity and climate mitigation, locking away carbon and supporting rare species. The construction of 15 turbines, with the foundations, roads, cable trenches and drainage works required, would set this recovery back by decades and release significant stored carbon. This directly undermines the very climate objectives such a project is presented as serving.

9. Sacred landscape and archaeology

Lemanaghan is one of the most archaeologically rich landscapes in Ireland. It contains the early medieval monastic site founded by St Manchán in AD 645, St Mella's Cell, the holy well, the pilgrimage route, and many recorded monuments. The wider bog contains hundreds of archaeological sites of national and international importance, including prehistoric wooden trackways and platforms, with finds such as the Lemanaghan Crozier, Neolithic tools and a medieval silver coin hoard already recovered from the peat. The earliest traces of human activity in the area date back some 5,500 years.

In January 2025, following Storm Éowyn, previously unknown human burials were exposed at St Mella's Cell. Radiocarbon dating has confirmed that these remains date from the time of St Manchán himself, between the 7th and 10th centuries AD. The bones found last year, dating back to St Manchán's time, are an incredible thing to have happened, and it is reasonable to assume that many other significant artefacts remain hidden in the bog awaiting discovery.

This is a sacred landscape. To industrialise it now — after the bones of those who lived alongside St Manchán have only just come to light — would be a profound failure of stewardship. The setting of recorded monuments and their surrounding cultural landscape is, and should be, a material planning consideration — as was indeed the express finding of An Bord Pleanála in the refusal of my son's home (PL19.301833), which cited “the character and setting of the monastic site to the north” as a ground of refusal.

10. Tourism potential

The area has great untapped potential for heritage, pilgrimage and eco-tourism. Monastic sites, holy wells, pilgrimage routes and a recovering bog landscape are increasingly sought-after by visitors. Once the turbines go up, that opportunity is largely lost: the visual and acoustic intrusion of industrial-scale wind energy infrastructure is fundamentally incompatible with the quiet, contemplative tourism this area is so well placed to offer.

11. The irreversible nature of the development

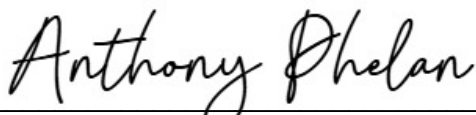
Once the turbines go up, it can't go back. The decision before An Coimisiún Pleanála is therefore not a routine operational matter with a 25- or 30-year horizon; it is, in practice, an irreversible alteration of one of the most historically resonant landscapes in Ireland, with permanent foundations, drainage alterations and disturbance of the peat itself.

Conclusion

I would like my grandchildren and great-grandchildren to see this landscape much as it is today — a haven for wildlife and birds, a place of quiet, and a living link to over fifteen hundred years of Irish history. I do not want my generation to be the ones who allowed it to be spoilt by turbines.

I hope common sense will prevail before it is too late. I therefore formally object to the planning proposals for Lemanaghan Wind Farm, Case Reference PAX19.324161, and respectfully ask An Coimisiún Pleanála to refuse this application.

Yours faithfully,

A handwritten signature in black ink that reads "Anthony Phelan". The signature is written in a cursive style with a horizontal line underneath it.

Anthony Phelan Sr.

Kilnagarna, Co. Offaly