



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

David & Emma Larkin

(b) Observer's postal address

Cooldorragh, Ballinahown, Athlone, Co. Offaly,
N37T8N2

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

N/A

(b) Agent's postal address

N/A

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Coimisiún Pleanála case number for the current application (if available)**

(for example: 300000)

PAX19.324161

- (b) **Name or description of proposed development**

Lemanaghan Wind Farm

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Cooldorragh, Kilnagarnagh,
Cappanalosset, Tumbleagh, Killaghintoher,
Castlearmstrong, Leabeg, Cornafurrish and
Corrabeg, Lemanaghan, Kilnagoolny, Straduff,
Lisdermot, Derrica More, Rosfaraghan,
Rashinagh, Cor Mor and Cor Beg, Corbane,
and Ballindown, Co. Offaly.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

As follows.

Planning Observation – Lemanaghan Wind Farm Application

Proposed 220kV GIS Substation and Associated Grid Infrastructure

I wish to make an observation in relation to the proposed Lemanaghan Wind Farm development, specifically regarding the proposed onsite 220kV GIS substation and associated grid infrastructure located in proximity to my residence along the L7001 local road.

My concerns relate primarily to:

- The implications of the proposed development for proper planning and sustainable development;
- The significant and permanent visual impact arising from the proposed substation and associated infrastructure;
- The adequacy and reliability of the Landscape and Visual Impact Assessment (LVIA);
- The adequacy of the proposed mitigation measures;
- Whether reasonable alternative siting and design solutions have been adequately considered.

My dwelling is located approximately 350m north of the proposed onsite substation (Appendix A). Drawing *200804_-_37_GIS_Building_Roof_Plan_and_Elevations* shows the finished floor level for the main switchgear building (GIS building) within the substation at 56.90m OD and an overall height and elevation of approximately 21.61m and 78.51m OD respectively. My dwelling sits at an elevation of approximately 62.75m OD and roof level of approximately 70.68m OD.

While the substation site itself sits at a lower ground elevation, the proposed GIS building roof level would rise approximately 7.83m above the roof level of my dwelling and would form a visually prominent industrial structure within close proximity to an established residential receptor (Appendix B).

Having reviewed the EIAR documentation, particularly Chapter 14 (Landscape and Visual), Chapter 3 (Site Selection and Reasonable Alternatives), and the associated drawings and appendices relating to the proposed 220kV substation and grid infrastructure, I have significant concerns regarding the adequacy of the assessment, the robustness of the proposed mitigation measures, and whether the development as proposed adequately protects residential visual amenity and satisfies the requirements of proper planning and sustainable development.

These concerns are outlined under the following headings.

1. Inadequate Assessment of Existing Visual Screening

The EIAR repeatedly relies on the assumption that nearby residential receptors are substantially screened by existing vegetation.

The LVIA states that:

“many of these residential receptors, as well as the road itself, are surrounded by treelines and hedgerows that will provide visual screening towards the proposed onsite 220kV substation.”

However, this description does not accurately reflect the conditions at my property or along sections of the adjoining L7001 local road.

The Route Screening Analysis within the EIAR identifies sections of the L7001 directly adjoining the proposed substation and nearby residential receptors as “Class 1 – No / Very Little Visual Screening.”

The photographic evidence and annotated drawings submitted with this observation (Appendix C) demonstrate that existing vegetation is either absent, intermittent, immature, or insufficient to materially screen views toward the proposed substation, associated steel structures & telecom tower.

The conclusions reached in the LVIA therefore appear to rely on an inaccurate or overstated baseline assessment of existing screening conditions. Where the underlying baseline is materially inaccurate, the conclusions regarding the significance of visual effects cannot reasonably be considered reliable.

2. Permanent Nature of the Proposed Infrastructure

The EIAR confirms that the proposed onsite substation and associated grid connection infrastructure will remain in place permanently as part of the national electricity grid infrastructure, unlike the turbines themselves which are proposed to be decommissioned following the operational life of the wind farm.

This distinction is significant.

The planning authority should apply a particularly high standard when assessing permanent industrial infrastructure located in close proximity to established residential properties.

The proposed GIS building, associated steel masts, overhead line connections, compounds, lighting, and associated infrastructure would introduce a permanent industrial feature into an existing rural and peatland landscape setting.

The permanent nature of this infrastructure greatly increases the significance of the visual impact on nearby residential receptors.

3. Scale, Skyline Intrusion and Visual Dominance of the GIS Building

The EIAR itself describes the proposed GIS substation as:

- “a tall structure”;
- approximately 21m in height;

- and “one of the larger and more visually prominent elements of the non-turbine infrastructure.”

The scale, height, and industrial character of the proposed infrastructure appear inconsistent with the conclusion that the resulting visual effects are not significant.

The GIS building would rise approximately 7.83m above the roof level of my dwelling despite the lower site elevation. In the context of a relatively open peatland landscape with limited mature screening, the proposed structure would become visually dominant and highly conspicuous from nearby residential properties and the surrounding local road network.

Due to the scale and elevation of the proposed GIS building, the structure would also break the existing horizon line when viewed from nearby residential receptors and sections of the surrounding landscape, introducing visually prominent industrial built form into views currently characterised by open peatland landscapes and distant views toward the townlands of Kilnagarna, Thumbeagh and Rashinagh.

The proposed development would therefore result in a substantial and permanent alteration to the existing visual amenity currently experienced by nearby residential receptors.

4. Overreliance on Future Planting and Deferred Mitigation

The proposed mitigation strategy relies heavily on berm construction and future planting measures intended to reduce visibility of the proposed substation over time.

The EIAR repeatedly refers to visibility being reduced “once vegetation has reached maturity”, including within photomontage VP18 which presents a “10 year growth estimate” for mitigation planting.

However, future planting cannot reasonably be considered equivalent to established existing screening.

The visual impact of the proposed substation and associated infrastructure will arise immediately upon construction and continue for many years until any proposed planting reaches effective maturity, if successful at all.

In addition, the applicant has not adequately demonstrated:

- the likely establishment success of the proposed planting;
- the timeframe required for effective screening;
- the year-round effectiveness of the proposed vegetation;
- or how such mitigation will function within the exposed peatland landscape conditions present at the site.

The proposed mitigation measures therefore appear uncertain, deferred, and insufficient relative to the scale and permanence of the proposed infrastructure.

5. Failure to Demonstrate Adequate Mitigation by Design or Alternative Siting

The EIAR states that three alternative locations for the proposed onsite 220kV substation were considered as part of the design process.

However, the assessment presented appears limited in scope and does not sufficiently demonstrate that a comprehensive evaluation was undertaken to identify the least visually intrusive location for what is acknowledged to be a large-scale and permanent element of infrastructure.

The EIAR confirms that the selected location was strongly influenced by proximity to the existing 220kV overhead line infrastructure and associated grid connection considerations, noting the *“close proximity of its potential grid connection which would provide environmental and project viability benefits.”*

While engineering and grid connection considerations are relevant factors, the EIA process also requires that environmental effects, including visual amenity impacts, are adequately considered in the assessment of reasonable alternatives.

The assessment of substation alternatives appears particularly limited given:

- the substantial scale of the proposed GIS building;
- the permanent nature of the infrastructure;
- the proximity to nearby residential receptors;
- and the acknowledged visibility of the development from elevated local roads and surrounding dwellings.

A more extensive and transparent assessment of alternative siting options and receptor-specific visual impacts would reasonably be expected.

6. Internal Inconsistencies Within the LVIA

The assessment contains apparent inconsistencies regarding the extent of existing visual screening within the surrounding landscape.

For example, in the assessment of Substation Alternative 3, the EIAR states:

“there are open views into the bog from the N62 national road from a number of locations.”

However, elsewhere within the Landscape and Visual chapter, the Route Screening Analysis classifies sections of this same road corridor as “Class 3 – Dense / Full visual screening”, while road sections adjoining the selected substation location and nearby residential receptors are identified as “Class 1 – No / Very Little Visual Screening.”

This apparent inconsistency raises concerns regarding the reliability and consistency of the visual screening methodology applied throughout the LVIA.

Further inconsistencies arise where operational effects associated with the wind farm are defined as “Long-Term” due to the 35-year operational life of the project, while visual effects associated with telecommunications infrastructure (36m network tower location within the 220kV substation compound) are elsewhere described as “Short-Term.”

Such inconsistencies raise concerns regarding the robustness and reliability of the assessment methodology applied throughout the EIAR.

7. Sensitivity of Residential Receptors and Rural Amenity

The EIAR appears to understate the sensitivity of nearby residential receptors.

The proposed substation is located approximately 350m from existing dwellings and would introduce large-scale industrial infrastructure into views currently characterised by a rural landscape with relatively limited built form.

Residential receptors should reasonably be regarded as highly sensitive receptors within a Landscape and Visual Impact Assessment.

The proposed infrastructure would materially alter the existing residential visual environment on both a day-to-day and permanent basis.

In addition, Chapter 12 of the EIAR identifies nearby dwellings as “Noise Sensitive Locations” within an area characterised by low background noise levels. This further reinforces the sensitivity of the receiving residential environment and the importance of protecting existing rural residential amenity.

8. Proper Planning and Sustainable Development

Having regard to:

- the proximity of the proposed infrastructure to existing dwellings;
- the height and visual prominence of the GIS building and associated structures;
- the permanent nature of the infrastructure;
- the apparent overreliance on future planting measures;
- the lack of existing effective screening;
- the visual intrusion on the existing horizon and landscape character;
- and the limited evidence of meaningful alternative siting assessment,

I submit that the proposed development gives rise to significant concerns regarding proper planning and sustainable development of the area.

Conclusion

In light of the above concerns, I respectfully request that the planning authority:

- Reassess the visual impacts arising from the proposed onsite 220kV GIS substation and associated infrastructure on nearby residential receptors;
- Verify the accuracy of the baseline screening assumptions used within the LVIA;
- Require further assessment of alternative substation siting and design options;
- Require more substantial and immediate visual mitigation measures;
- Consider whether the proposed development, as currently designed and located, adequately protects residential visual amenity and therefore constitutes proper planning and sustainable development.

I respectfully request that full consideration be given to the concerns outlined above in determining this application.

Yours sincerely,

David & Emma Larkin

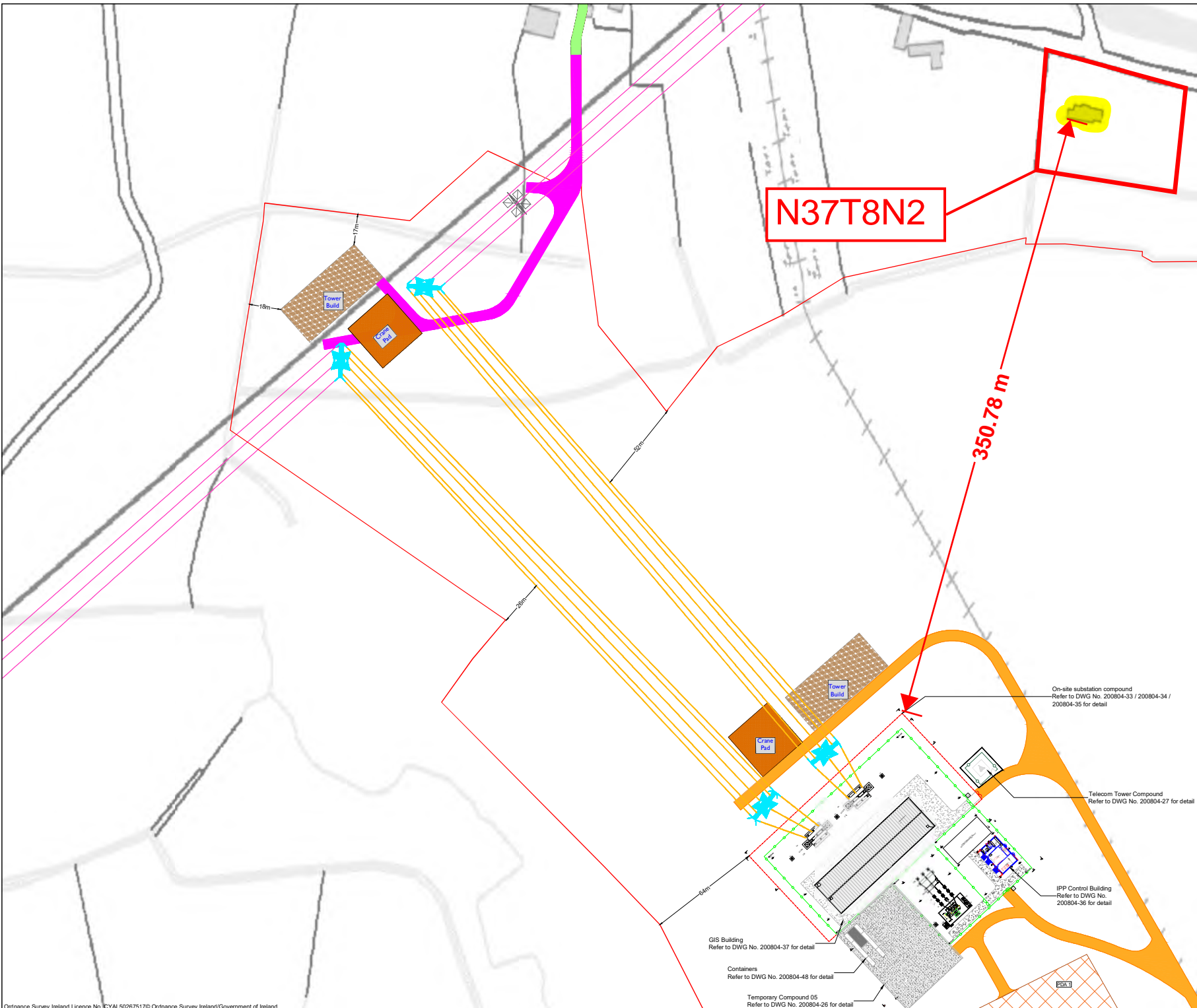
Schedule of Supporting Appendices

Appendix A – Location of N37T8N2 relative to proposed substation

Appendix B – Reference elevations

Appendix C – Route Screening Analysis and Existing Screening Conditions (Dwelling N37T8N2 and L7001)

APPENDIX A



- Project Design Drawing Notes**
1. Drawings issued are for planning application purposes only.
 2. Drawings not to be used for construction/contract conditions.
 3. Copyright, all rights reserved. No part herewith may be copied or reproduced partially or wholly in any form whatsoever without the prior notice of the copyright owner McCarthy Keville O'Sullivan.
 4. Do not scale off this drawing. Figured metric dimensions only should be taken off this drawing.
 5. All contractors, whether main or sub-contractors, must visit the site and are responsible for taking and checking any and all dimensions and levels that relate to the works.
 6. The use of or reliance upon this drawing shall be deemed to be acceptance of these conditions of use unless otherwise agreed in writing, such written agreement to be sought from and issued by the copyright holder to the use or reliance upon this drawing.
 7. Layout plans show typical Turbine rotor diameter as per turbine drawing.
 8. Final levels may vary depending on local ground conditions.

- Drawing Legend**
- Planning Application Boundary
 - Existing Road to be Upgraded
 - Proposed Road
 - Proposed Temporary Access Track
 - ✦ Proposed Steel Mast
 - ✦ Existing Steel Mast
 - — — Proposed OHL
 - — — Existing OHL



PROJECT TITLE:
Lemnaghan Wind Farm, Co. Offaly

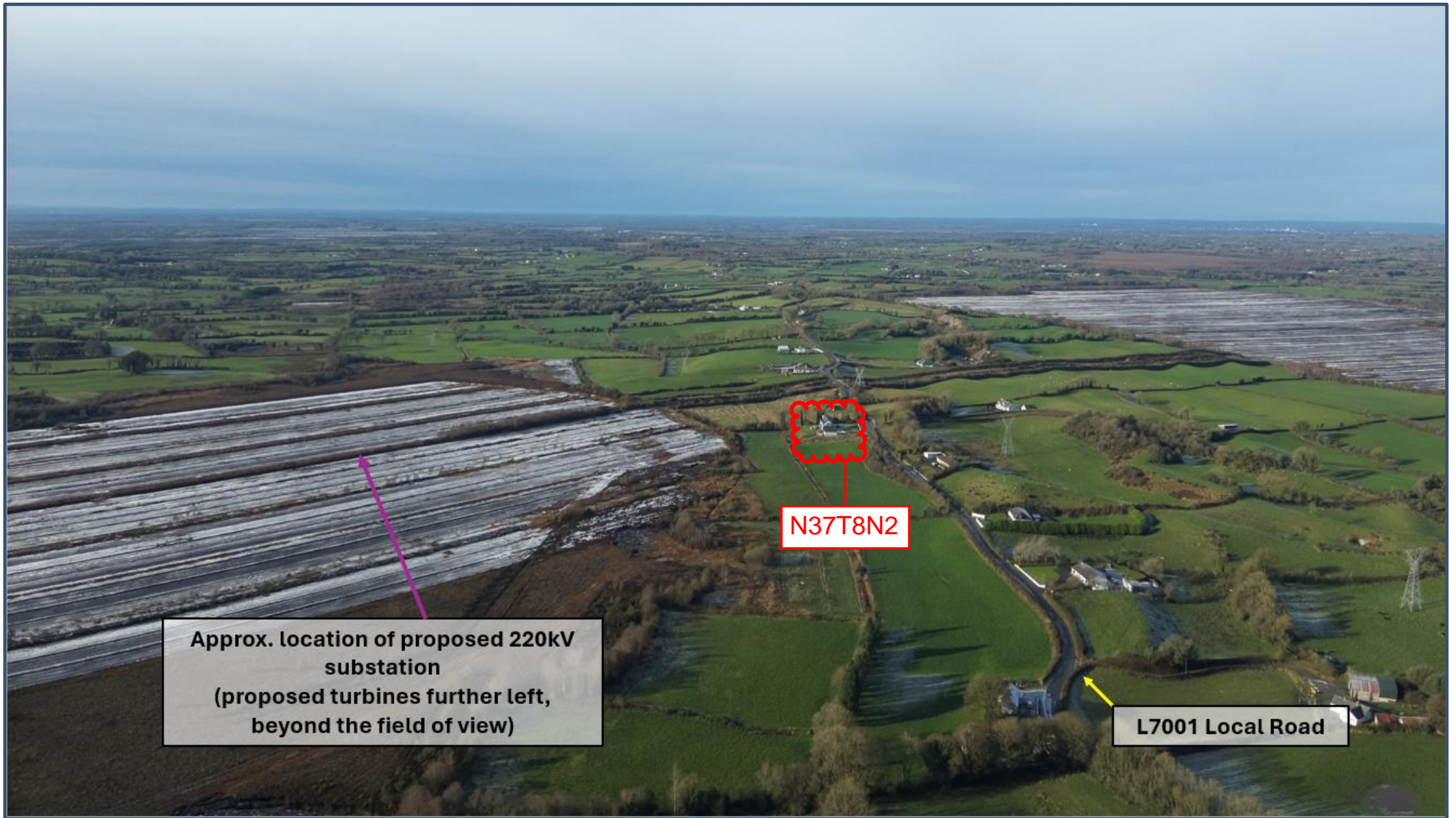
DRAWING TITLE:
Grid Infrastructure Overall Arrangement

PROJECT No.: 200804	DRAWING No.: 200804-46	SCALE: 1:1,000 @ A1
DRAWN BY: GO	CHECKED BY: RD	DATE: 23.03.2026
GS SHEET No.:		REVISION: P01

3302, 3303, 3304, 3365, 3366, 3367, 3428, 3429, 3430



Email: info@www.mkoireland.ie Website: www.mkoireland.ie

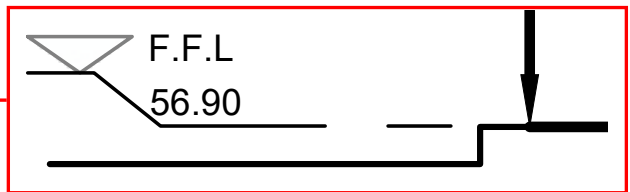
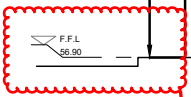
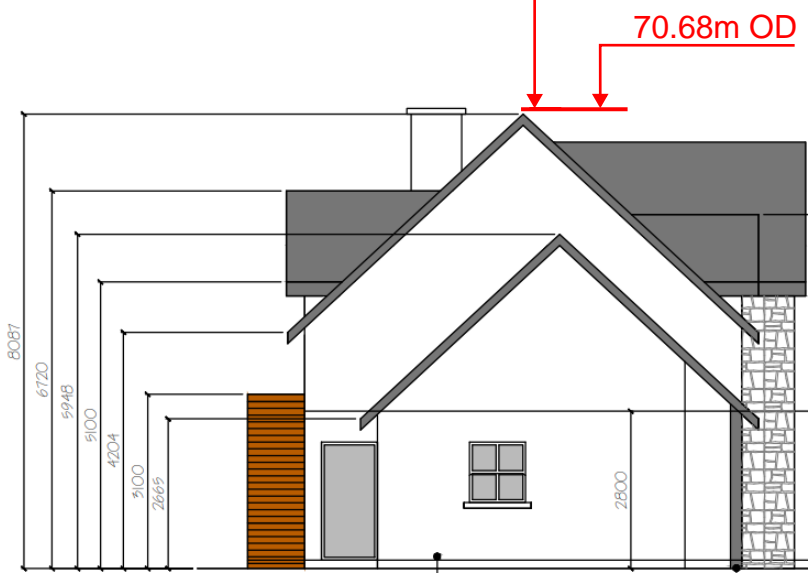
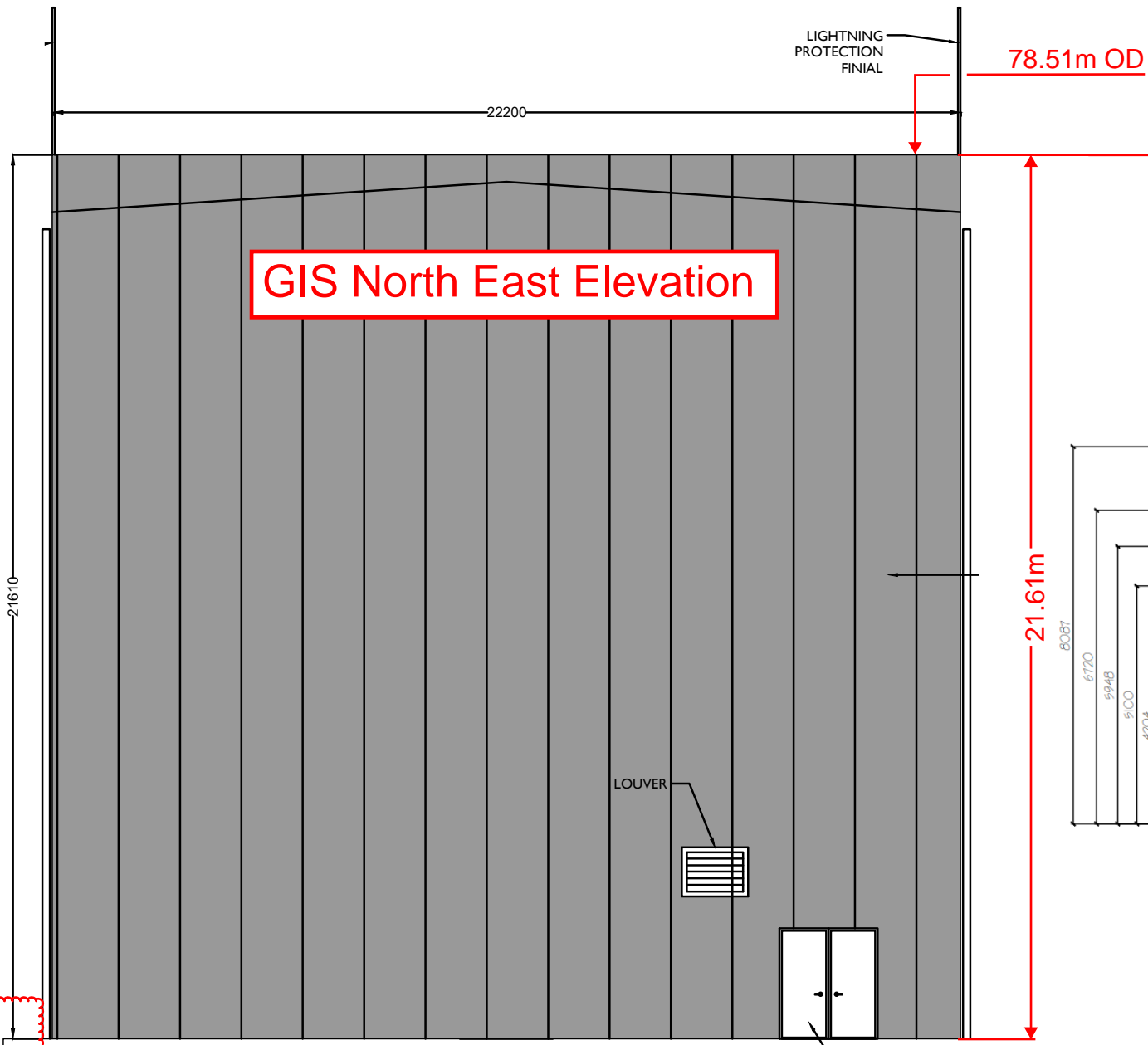


N37T8N2

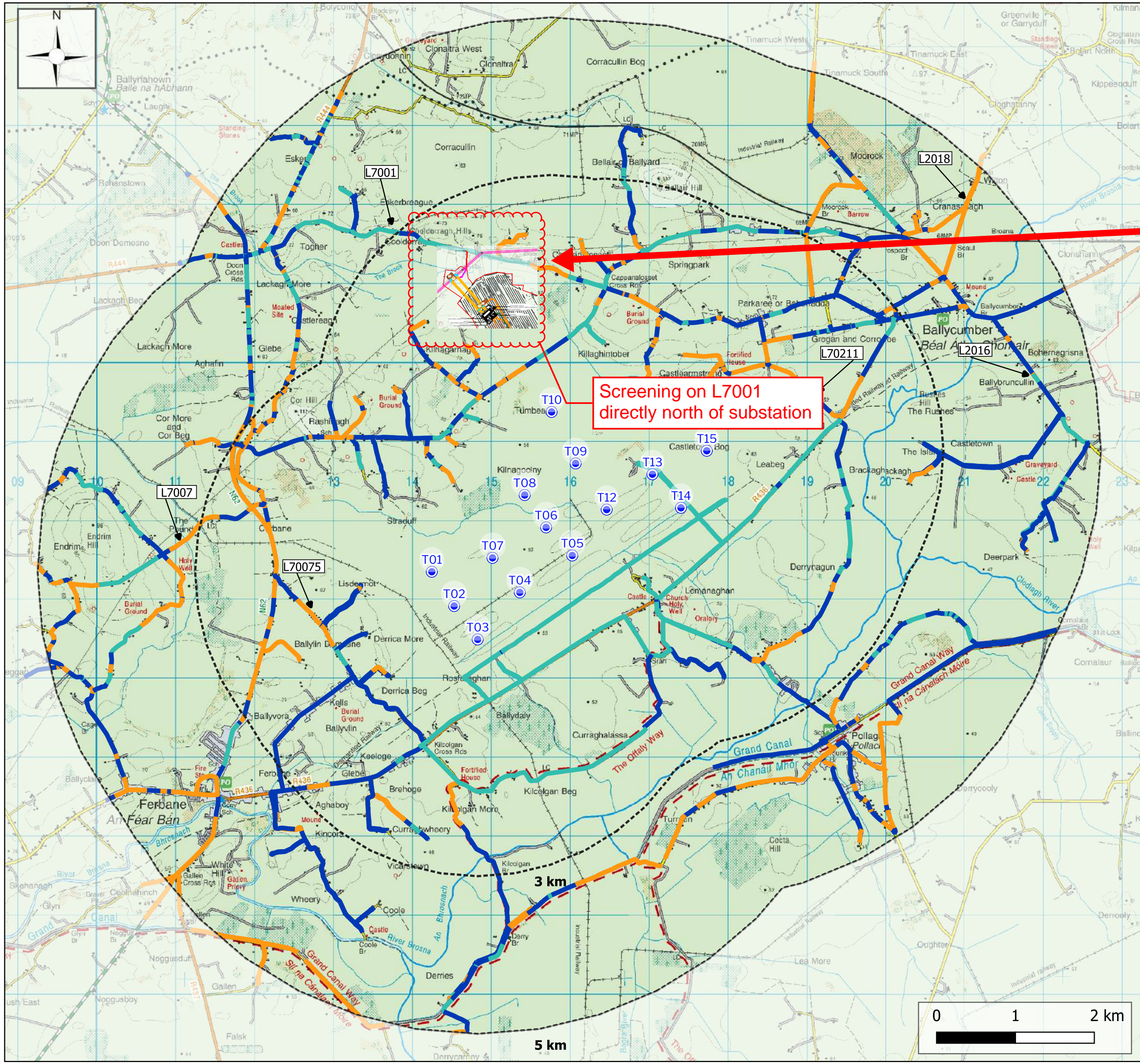
Approx. location of proposed 220kV substation
(proposed turbines further left,
beyond the field of view)

L7001 Local Road

APPENDIX B



APPENDIX C

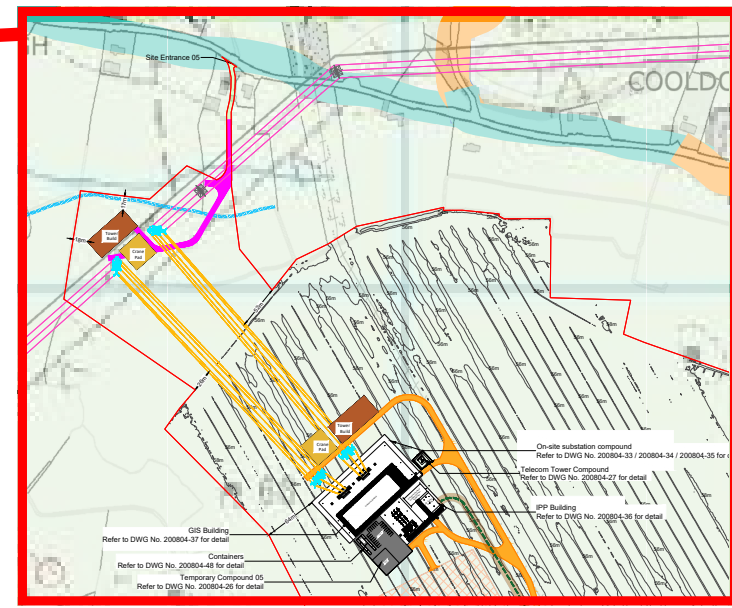


Map Legend

- RSA Extent
- Proposed Turbines

Route Screening Analysis

- Class 1 - No / Very Little Visual Screening
- Class 2 - Partial / Intermittent Visual Screening
- Class 3 - Dense / Full Visual Screening



© Ordnance Survey Ireland. All rights reserved. Licence number CYAL50267517
Drawing No.

Figure 14-4

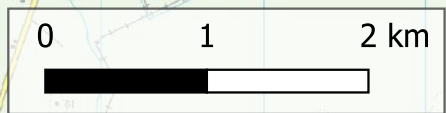
Drawing Title

Route Screening Analysis

Project Title

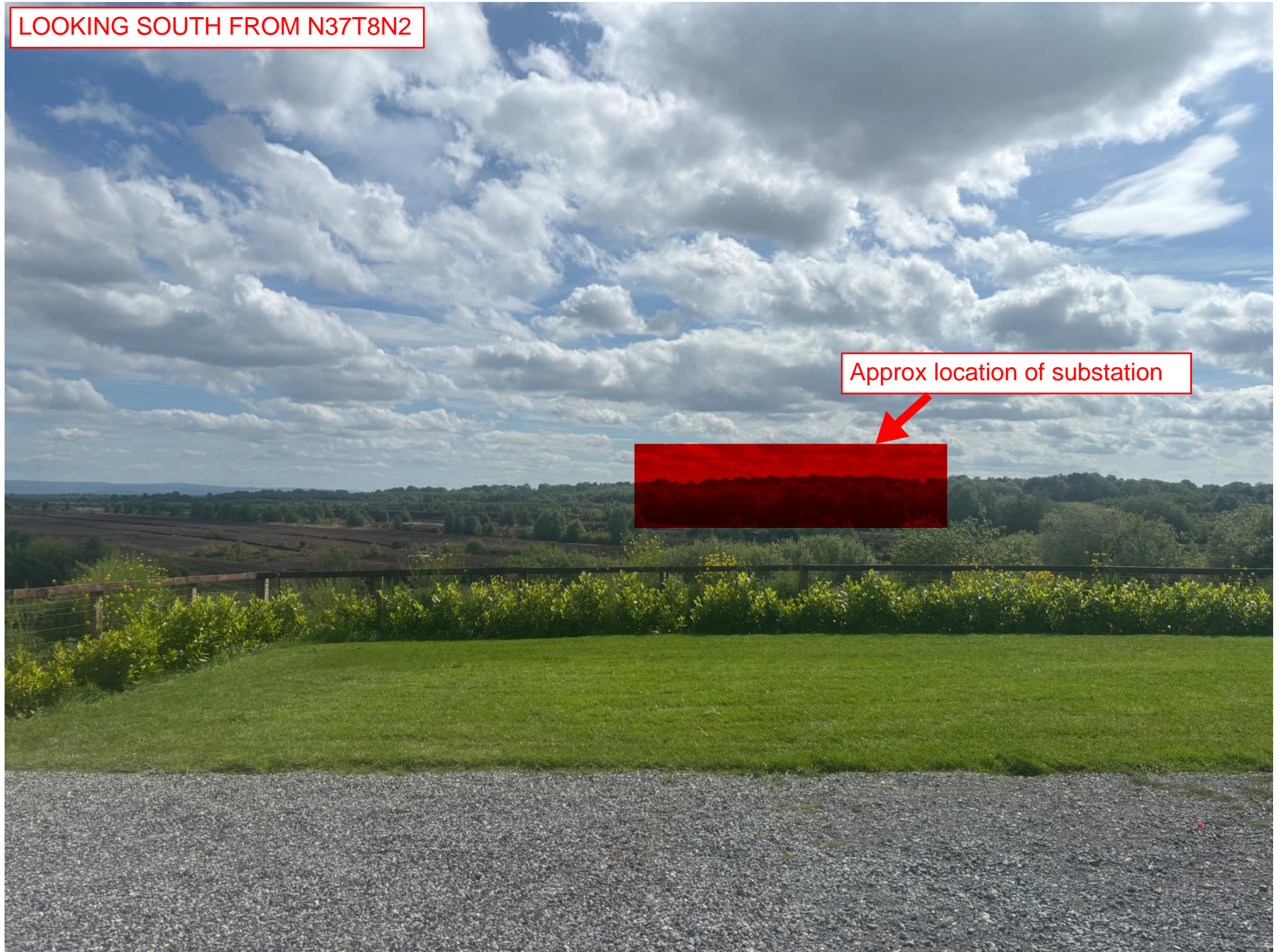
Lemnaghan Wind Farm, Co. Offaly

Scale	Project No.	Date	Drawn By	Checked By
1:47,000	200804	22/01/2026	JC	DM



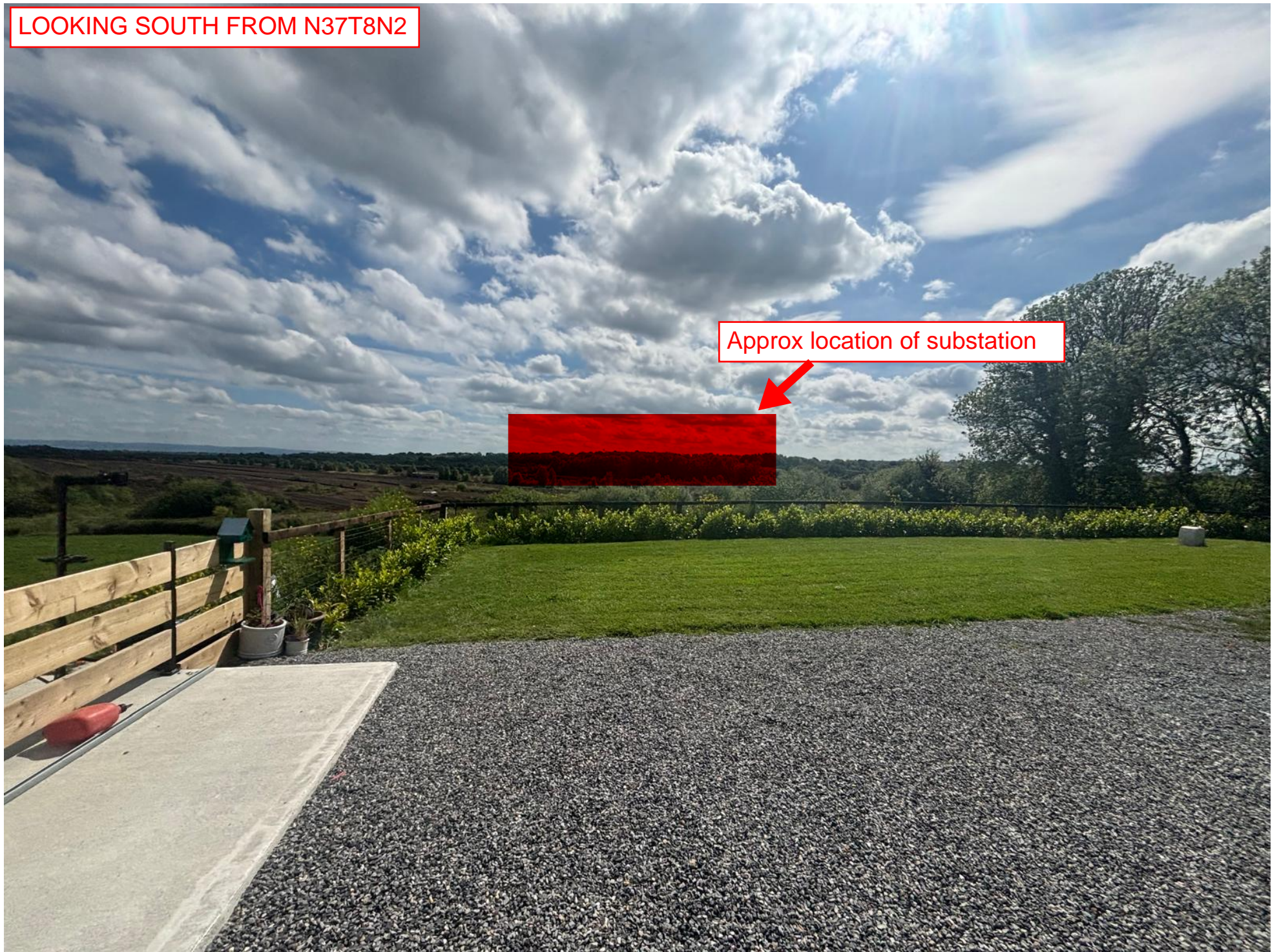
LOOKING SOUTH FROM N37T8N2

Approx location of substation



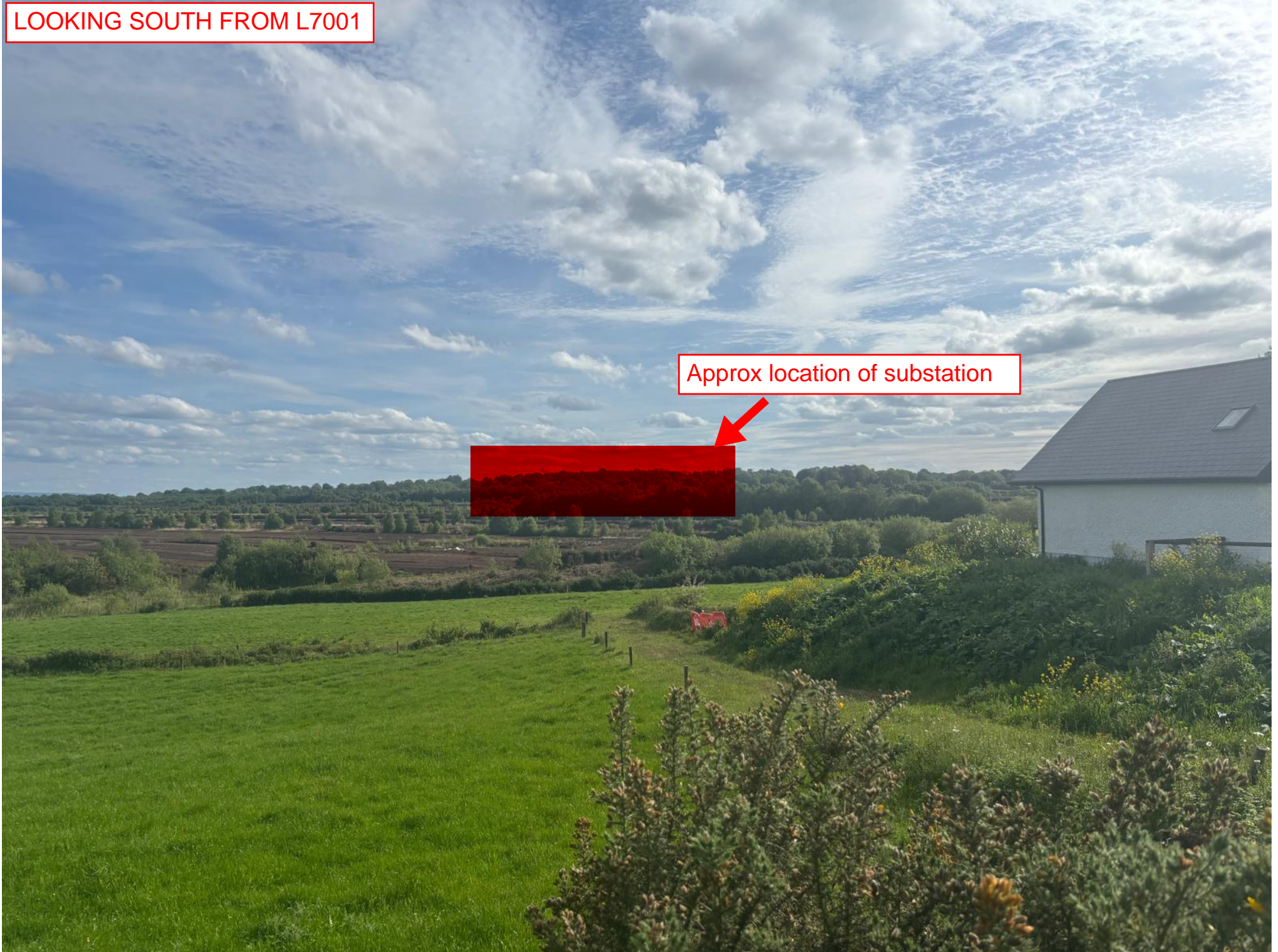
LOOKING SOUTH FROM N37T8N2

Approx location of substation



LOOKING SOUTH FROM L7001

Approx location of substation



Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office.

You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Coimisiún to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes