

PERSONAL OBSERVATION / OBJECTION

Proposed Lemanaghan Wind Farm, Co. Offaly

To: An Coimisiún Pleanála

Re: Proposed Lemanaghan Wind Farm, Co. Offaly

Applicant: Lemanaghan Wind Farm DAC, Bord na Móna / SSE Renewables joint venture

Case Reference: PAX19.324161

Description: Proposed development of 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure.

Submitted by: Denise Casey and Simon Casey

Address: Lemanaghan, Ballycumber, Co. Offaly

Eircode: R35 KN52

Date: 21st May 2026

Dear Sir / Madam,

We are both local people. We both grew up in this area, and Denise grew up in Lemanaghan itself. We chose to build our home here because we love this place — its peace, its wildlife, its history, its community and its deep sense of belonging. We walk this bog every day. Our children have grown up breathing its air and hearing its birds. What is now being proposed for this landscape fills us with genuine dread. Fifteen industrial turbines, up to 220 metres high — structures on the scale of a 60-storey building — imposed over a living bog, a sacred monastic landscape, and our family home. We are not given to exaggeration. But we cannot find words strong enough to express how wrong we believe this to be, and how much we fear what will be lost if it is permitted. We are asking this Commission, respectfully but with the deepest sincerity, to refuse permission.

We, Denise Casey and Simon Casey, make this personal observation and objection to the proposed Lemanaghan Wind Farm. We are not opposed to renewable energy or climate action. However, we strongly and unreservedly object to this proposal, in this place, at this scale.

Lemanaghan is not empty land or wasteland. It is a living bog, a place of Red-listed birds and protected animals, a place of important and still-emerging archaeology, and a place of daily life and deep meaning for local families. Its history of industrial peat extraction does not make it suitable — in planning, environmental or community terms — for a second wave of heavy industrialisation.

1. Our Home and Our Children: A Sensitive Residential Receptor

Our home is located at approximately 53.292573238321495, -7.7470829817836995. Using the Applicant's turbine coordinates from Table 4-1, the nearest proposed turbines to our home are:

- **T05 — approximately 1.086 km**
- T12 — approximately 1.292 km
- T14 — approximately 1.331 km
- T4 — approximately 1.557 km
- T6 — approximately 1.566 km

We are not distant observers. We are a family living within the real receiving environment of this development. Our children live, sleep, play and grow up within approximately 1.1 kilometres of the nearest proposed turbine.

We want the Commission to hold that image. A family. Children sleeping at night. 1.1 kilometres from a 220-metre industrial turbine, spinning through the night, generating low-frequency rhythmic noise in a landscape that is otherwise silent. That is what is being proposed. That is what we are being asked to accept.

We ask that our home be formally treated as a specific sensitive residential receptor for the purposes of noise assessment, shadow flicker, visual impact, residential amenity, human health, children's wellbeing, cumulative effects and loss of rural tranquillity.

We are deeply distressed that a place which has sustained local people for generations — a place of birds, bog, prayer and belonging — could be transformed into an industrial energy site with 15 turbines, access roads, hardstands, concrete foundations, substations, construction compounds, security fencing and restricted access.

The Commission must not assess this development only from maps, models and technical drawings. It must consider the lived experience of the families who are here, who will remain here, and who will live with the permanent consequences of whatever decision is made.

2. Red-Listed and Protected Wildlife: A Landscape of Irreplaceable Species

Over many years of daily walking and running on Lemanaghan Bog, we have personally witnessed some of Ireland's most precious, rare and protected birds and animals in this landscape. These are not records from a consultant's report. These are creatures we have watched, heard and known over years:

- Curlew (*Numenius arquata*) — Red-listed in Ireland, a species of the highest conservation concern, whose haunting call defines the spirit of this bogland and which faces an existential threat to its survival as a breeding bird in Ireland
- Hen Harrier (*Circus cyaneus*) — Amber-listed in Ireland, listed on Annex I of the EU Birds Directive, and a highly sensitive protected raptor species
- Whooper Swan (*Cygnus cygnus*) — listed on Annex I of the EU Birds Directive, a large, slow-flying bird at serious risk of turbine blade collision
- Lapwing (*Vanellus vanellus*) — Red-listed in Ireland
- Grey Heron (*Ardea cinerea*)
- Badger (*Meles meles*) — protected under the Wildlife Act 1976
- Common Lizard (*Zootoca vivipara*) — Ireland's only native reptile, protected under the Wildlife Act 1976
- Otter (*Lutra lutra*) — fully protected under Annex II and Annex IV of the Habitats Directive, Appendix III of the Bern Convention, and the Wildlife Act 1976
- Irish Hare (*Lepus timidus hibernicus*) — a distinct subspecies unique to Ireland, protected under the Wildlife Act 1976

These species are not theoretical assessment points. They are living creatures that are part of the heart and character of this place, and their presence here is part of why Lemanaghan matters and why its destruction would be so profound.

We are genuinely alarmed that the construction and operation of 220-metre turbines, with spinning blades, access roads, drainage works, concrete foundations, lighting, noise,

traffic and permanent habitat alteration, would risk displacing, disturbing or killing wildlife that Irish and European law specifically requires to be protected.

The Wildlife Act 1976 protects wild birds and animals and includes serious offences relating to disturbance. The European Communities (Birds and Natural Habitats) Regulations 2011 protect species and their breeding and resting places. The Birds Directive and Habitats Directive impose precautionary obligations on competent authorities.

We ask the Commission to treat the Applicant's Appendix 7-6 Collision Risk Assessment as a serious and material warning, not as a compliance formality. Where that assessment appears to predict potential bird collision mortality involving Red-listed and/or Annex I species, including Curlew and Hen Harrier, this should weigh strongly against the grant of permission.

3. Biodiversity, EIA and the Legal Requirement for Certainty

The EIA Directive requires likely significant effects to be assessed before consent is granted, including effects on population and human health, biodiversity, land, soil, water, climate, landscape, material assets and cultural heritage, and the interaction between those factors.

Where European sites, protected habitats or protected species are concerned, the Commission must apply the precautionary approach and must be satisfied on legally robust evidence. In *Holohan v An Bord Pleanála*, Case C-461/17, the Court of Justice confirmed the need for complete, precise and definitive findings capable of removing reasonable scientific doubt in the Appropriate Assessment context.

If uncertainty remains about protected birds, displacement, collision mortality, habitat loss, drainage impacts, peat disturbance, water quality, archaeological damage, fire risk, noise, shadow flicker or human health, that uncertainty must not be pushed onto local families, wildlife and the bog after permission is granted. The Applicant must provide sufficient information before consent so that the Commission can reach a lawful and reasoned conclusion.

4. Peatland, Carbon, Water and Bog Fire Risk

Lemanaghan Bog is a peatland landscape with clear ecological, hydrological and restoration importance. In our view, it should be treated as a landscape for recovery and protection — not as a platform for further large-scale industrial development.

Restored and protected peatlands can function as significant carbon stores, contributing to Ireland's legally binding obligations under the Climate Action and Low Carbon Development (Amendment) Act 2021, including the target of a 51% reduction in emissions by 2030 and net-zero no later than 2050. Bord na Móna itself has publicly acknowledged the climate value of peatland restoration.

We are deeply concerned that turbine foundations, access roads, drainage trenches, borrow pits, dewatering operations and associated works would disturb peat at depth, release stored carbon, alter the hydrology of the bog and potentially convert a recovering carbon store into a source of carbon emissions. That outcome would be the opposite of climate action.

We are also concerned about downstream water quality. The Water Framework Directive imposes a strict no-deterioration obligation, confirmed in relation to individual project authorisation by the Court of Justice in the *Weser* case, Case C-461/13. We ask the Commission to be satisfied, on robust evidence, that this development will not cause deterioration in any waterbody, aquatic receptor or hydrologically connected habitat.

We also raise a serious and personal concern about bog fire risk. Over many years, we have personally witnessed bog fires on Lemanaghan Bog. Some have lasted for days and continued to smoulder underground for weeks. Bog fires can be extremely difficult to

control, can damage habitats, affect local air quality, threaten wildlife and create serious emergency-access challenges in a remote peatland landscape.

We have witnessed these fires with our own eyes. We know how fast they can spread and how long they can burn underground. The introduction of 15 turbines, electrical infrastructure, construction machinery, hardstands and access roads into this bog significantly changes the fire-risk environment. We do not believe the application has clearly demonstrated a completed, detailed and site-specific bog fire and turbine fire emergency plan for Lemanaghan Bog. That plan should exist and should be assessed before consent is granted, not deferred to a later stage.

5. Noise, Shadow Flicker, Sleep and the Health of Our Family

We are extremely and genuinely frightened about noise, shadow flicker and the real effect this development would have on our health, our sleep, our peace and the daily quality of our family life. These are not abstract or theoretical concerns. They are the fears of parents who understand what persistent night-time disturbance does to a family.

We have spoken to families living near existing wind turbines in Offaly, including residents near Cloghan, who have described persistent rhythmic thumping, low-frequency noise that penetrates walls, shadow flicker that intrudes into rooms, sleep disturbance and difficulty getting complaints resolved in any meaningful way. Those residents have told us that complaints were made to Offaly County Council regarding wind-farm noise, shadow flicker and related amenity impacts. We are also aware that complaint records relating to existing Offaly wind farms may be sought or reviewed through Freedom of Information. We are not relying on those records as a separate appendix to this personal objection, but the fact that local residents have reported and complained about these impacts reinforces our genuine concern that noise, shadow flicker and sleep disturbance are real-world issues which must be assessed seriously before permission is granted.

The proposed Lemanaghan turbines, at up to approximately 220 metres, would be materially larger than any turbines currently operating in Offaly. We refuse to accept that our family should become a test case for turbines of this unprecedented scale in a quiet rural bogland setting.

The High Court's decisions in **Webster and Anor v Meenacloghspar (Wind) Limited; Shorten and Anor v Meenacloghspar (Wind) Limited**, including the liability judgment [2024] IEHC 136 and the later judgment [2026] IEHC 154, demonstrate that planning noise conditions and modelled compliance do not necessarily answer whether wind-turbine noise may cause actionable nuisance in practice. Those cases concerned real-world wind-turbine noise impacts, including the character of turbine noise, rhythmic disturbance, unpredictability and night-time effects. This is directly relevant to our concern that paper compliance cannot be treated as proof that our family home will not suffer unacceptable noise impact.

In our submission, these cases show that a wind farm may be presented as compliant with planning noise limits and may still give rise to serious real-world disturbance and nuisance. That is why we are so frightened for our family, and why the Commission should not rely on modelling alone when assessing likely significant effects on residential amenity, sleep and human health.

We ask the Commission to look beyond paper compliance and consider how turbine noise and shadow flicker would affect real families at real homes, at night, during quiet waking hours, and over the full operational lifetime of this development. Sleep deprivation is not a minor inconvenience. For a family with children, persistent night-time noise, thumping, flicker, disturbance and stress can cause lasting harm to physical and mental health.

Likely significant effects on human health must be assessed before permission is granted. It is not acceptable to leave families to discover the true impact after construction, when the turbines are built and the harm is already done.

6. Sacred and Archaeological Heritage: A Landscape Still Yielding Its History

Lemanaghan is one of the most spiritually and historically significant bogland landscapes in Ireland. St Manchán's Church, St Mella's Cell, the ancient holy wells, the old monastic routeways and the wider sacred landscape are not simply heritage assets in a planning database. They are living places of faith, visited and venerated by local people, pilgrims and visitors. We bring our children there. We feel their connection across fifteen centuries.

Our children were among those who recently discovered uncovered human remains at Lemanaghan following Storm Éowyn. Bones of people who lived and died in this sacred place, revealed following Storm Éowyn in January 2025, with subsequent carbon-dating and media coverage in January 2026. That discovery changed something in us. It told us, in the most direct and undeniable way possible, that Lemanaghan is still revealing itself. We do not yet know what lies beneath this bog. And if we do not know, neither does the Applicant.

If a storm can expose human remains, turbine foundations, access roads, borrow pits, drainage works and deep excavations may destroy archaeological material that has survived for over a thousand years before it is ever found, recorded or protected. Once archaeology in a bog is destroyed, it is gone forever. There is no mitigation for that loss.

When we built our own family home in Lemanaghan between 2005 and 2007, Offaly County Council required us to have a qualified archaeologist present during all site excavation works. This was for an ordinary family home. If that level of archaeological supervision was required for a domestic dwelling in Lemanaghan, we cannot understand how anything less than the highest and most rigorous standard of continuous archaeological supervision, by suitably licensed archaeologists, during every phase of intrusive works, could be considered acceptable for a large industrial wind farm involving extensive excavation across a known and sensitive archaeological bog landscape.

We are also deeply concerned about the effect of 220-metre turbines on the setting, character, spiritual atmosphere and cultural significance of the Lemanaghan monastic landscape. This harm is not limited to physical disturbance. It includes the permanent visual, atmospheric and experiential damage to a sacred place. No planning condition can restore what is lost.

7. T05, the Development Plan and the Protection of the Monastic Landscape

We are particularly concerned about turbine T05, the nearest turbine to our home at approximately 1.086 kilometres. We understand from the Applicant's own documentation that T05 infrastructure is located approximately 1.9 metres outside the boundary of the 'Open to Consideration' wind-energy zoning, and that this zoning alteration was introduced to protect the character and setting of the Lemanaghan Monastic Site.

If the Applicant's own documentation shows that T05 infrastructure lies approximately 1.9 metres outside the 'Open to Consideration' wind-energy zoning boundary, this is not a minor mapping issue. It is, in our submission, a direct conflict with a development-plan boundary drawn specifically to protect the Lemanaghan Monastic Site. T05 should not be permitted, and the wider project should be refused unless the Commission can lawfully, transparently and expressly address this development-plan conflict. In our submission, the proper planning response is refusal.

8. Grounds for Refusal

We respectfully submit that permission should be refused on the following grounds:

- Population and human health under the EIA Directive, including noise, shadow flicker, sleep disturbance, stress, children's wellbeing, residential amenity and quality of life. By reference to **Webster and Anor v Meenacloghspar (Wind)**

Limited; Shorten and Anor v Meenacloghspar (Wind) Limited, including [2024] IEHC 136 and [2026] IEHC 154, paper compliance with noise limits should not be treated as conclusive proof that turbine noise will not cause unacceptable real-world disturbance, nuisance or harm to residential amenity.

- Biodiversity and protected species: the Applicant's own Collision Risk Assessment appears to predict potential mortality of Red-listed and/or Annex I species, including Curlew and Hen Harrier. This is a material ground for refusal.
- The Wildlife Act 1976, the European Communities (Birds and Natural Habitats) Regulations 2011, the Birds Directive and the Habitats Directive, including mandatory species protection obligations and the precautionary approach.
- The requirement that EIA be completed before development consent is granted: Wells, Case C-201/02.
- The need for complete, precise and definitive findings capable of removing reasonable scientific doubt in Appropriate Assessment matters: Holohan v An Bord Pleanála, Case C-461/17.
- The Water Framework Directive no-deterioration obligation and its application to individual project authorisation: Weser, Case C-461/13.
- The seriousness of EIA compliance for peatland wind farm development: Commission v Ireland, Case C-215/06 (Derrybrien).
- The T05 zoning issue: infrastructure located outside the 'Open to Consideration' zoning boundary introduced to protect the Lemanaghan Monastic Site.
- The absence of a clearly demonstrated and site-specific archaeological protection plan requiring continuous licensed archaeological supervision during all intrusive works in this known archaeological bog landscape.
- The absence of a clearly demonstrated and site-specific bog fire and turbine fire emergency plan for a peatland landscape where we have personally witnessed bog fires lasting for days and smouldering underground for weeks.
- The risk of irreversible harm to undiscovered archaeology, demonstrated by the exposure of human remains at Lemanaghan following Storm Éowyn and the subsequent 2026 carbon-dating/media coverage confirming early Christian / early medieval significance.
- The carbon and climate impact of peatland disturbance, inconsistent with Ireland's obligations under the Climate Action and Low Carbon Development (Amendment) Act 2021.
- The cumulative and irreversible transformation of Lemanaghan from a peaceful, sacred and biodiverse bogland into an industrial energy site.

Conclusion

We are not opposed to renewable energy. We are opposed to the industrialisation of this sacred, irreplaceable and living landscape.

Lemanaghan is our home. It is our children's place. It is a place of Red-listed birds whose survival is already under threat. It is a place of protected otters, hares, lizards and badgers who ask nothing of us except to be left in peace. It is a place of bog, of memory, of faith, of archaeology, of the bones of people who lived here over a thousand years ago. It is a place that survived centuries of human pressure — the drainage, the cutting, the industrial extraction — and which deserves, at last, to breathe and recover. We are devastated at the thought of 220-metre machines rising over this landscape, visible from every direction, spinning day and night, casting shadow over our home, making noise that will enter our walls and disturb our children as they sleep. We are frightened for our health. We are heartbroken for the wildlife. We are horrified that, in a bog so near where human remains were exposed following

Storm Éowyn and later confirmed by carbon-dating as early Christian / early medieval, further undiscovered archaeology could be damaged by turbine bases and excavation works. We are ordinary people. We are not developers or experts or lobbyists. We are a family who chose Lemanaghan because we love it. And we are asking this Commission, with everything we have, to protect it. Please refuse this permission.

Yours faithfully,

Denise Casey

Simon Casey

Lemanaghan, Ballycumber, Co. Offaly

R35 KN52

List of Appendices

The following appendices are submitted with this personal observation and objection and form part of our submission to An Coimisiún Pleanála:

Appendix A — Photographs of Lemanaghan Bog and Our Daily Life There

A series of personal photographs taken by Denise Casey and Simon Casey during walks on Lemanaghan Bog and along the Banagher Line. These images illustrate the open, peaceful and biodiverse character of the landscape, the scale of the receiving environment, and the nature of our daily family life in and around the bog. Each photograph is individually captioned with location and approximate date.

Appendix B — Photographs and Media Record: Archaeological Discovery at St Mella's Cell Following Storm Éowyn, January 2025, and Subsequent 2026 Media / Carbon-Dating Coverage

Photographs and images relating to the discovery of uncovered human remains at St Mella's Cell, Lemanaghan, following Storm Éowyn in January 2025, together with subsequent 2026 RTÉ/media coverage and carbon-dating information. The storm uprooted mature trees at the ecclesiastical site, exposing human remains. Scientific analysis reported in 2026 placed one burial between AD 662 and AD 817 and another between AD 707 and AD 939, confirming the early Christian / early medieval significance of the remains. This appendix is submitted in support of our submission that Lemanaghan is an actively and incompletely understood archaeological landscape.

Appendix C — Applicant's Shadow Flicker Study Area Map Showing Our Home as Sensitive Receptor No. 62

An annotated map showing the location of our family home at Lemanaghan, Ballycumber, Co. Offaly (Eircode R35 KN52) in relation to the proposed turbine positions as set out in the Applicant's Table 4-1. The map clearly identifies the nearest proposed turbine (T05, approximately 1.086 km), T12 (approximately 1.292 km), T14 (approximately 1.331 km) and the other nearest turbines. This map is submitted in support of our request to be treated as a specific sensitive residential receptor for the assessment of noise, shadow flicker, visual impact, residential amenity and human health.

Each appendix is clearly labelled, captioned and paginated. The appendices are intended to support and illustrate the grounds set out in the body of this personal observation and objection. Denise Casey and Simon Casey, Lemanaghan, Ballycumber, Co. Offaly, R35 KN52.

APPENDIX A

Photographs of Lemanaghan Bog and Our Daily Life There

A series of personal photographs taken by Denise Casey and Simon Casey during walks on Lemanaghan Bog and along the Banagher Line. These images illustrate the open, peaceful and biodiverse character of the landscape across all seasons, the scale of the receiving environment, and the nature of our daily family life in and around the bog. Each photograph is individually captioned with location and approximate date.

Section 1 — The Roadway and the Bog in All Seasons



The Banagher Line roadway looking west across the bog — early spring



Spring gorse in full bloom along the roadway verge, Lemanaghan Bog



The bog at sunrise on a winter morning — frost across the cutaway peat



The cutaway bog in late spring — the vast open landscape stretching to Bellair Hill



Gorse and heather in frost and snow — Lemanaghan Bog in deep winter



Flooded bog pools reflecting the winter sky — a wetland of international importance



Autumn heather and bog cotton along the roadside — mist on the bog



Winter flooding across the bog pools — a landscape full of wildlife and heritage



Bog pool at dusk — standing water across the cutaway after heavy rain



A still pool on the bog reflects the autumn sky — Lemanaghan, Co. Offaly

APPENDIX B

Photographs and Media Record: Archaeological Discovery at St Mella's Cell Following Storm Éowyn, January 2025, and Subsequent 2026 Media / Carbon-Dating Coverage

Photographs and images relating to the discovery of uncovered human remains at St Mella's Cell, Lemanaghan, following Storm Éowyn in January 2025, together with subsequent 2026 RTÉ/media coverage and carbon-dating information. The storm uprooted mature trees at the ecclesiastical site, exposing human remains. Scientific analysis reported in 2026 placed one burial between AD 662 and AD 817 and another between AD 707 and AD 939, confirming early Christian / early medieval significance.

These images show the fallen trees at the site of discovery, our children being interviewed by RTÉ News television, the children pictured with their cousins at the site where the bones were found, and the RTÉ News Facebook post reporting the discovery.

Section 2 — St Mella's Cell: The Trees, the Discovery and the RTÉ Coverage



The mature trees uprooted at St Mella's Cell, Lemanaghan, following Storm Éowyn — storm event January 2025



Our children at the base of the fallen trees where early Christian / early medieval human remains were uncovered



RTÉ News television crew filming at St Mella's Cell with our family & neighbours following the discovery — Jan.2026



Our daughter Mella being interviewed by RTÉ News at St Mella's Cell about the archaeological discovery



Our children interviewed by RTÉ News at St Mella's Cell, Lemanaghan — January 2026



Our children with their cousins at the site where early Christian / early medieval human remains were uncovered

RTÉ News — Media Coverage of the Discovery



RTÉ News Facebook post dated 23 January 2026: "Remains uncovered at a monastic site in Co Offaly following Storm Éowyn last year have been carbon dated to the early Christian period." The discovery at St Mella's Cell, Lemanaghan — reported by RTÉ News — demonstrates that this archaeological landscape continues to yield significant finds.

APPENDIX C

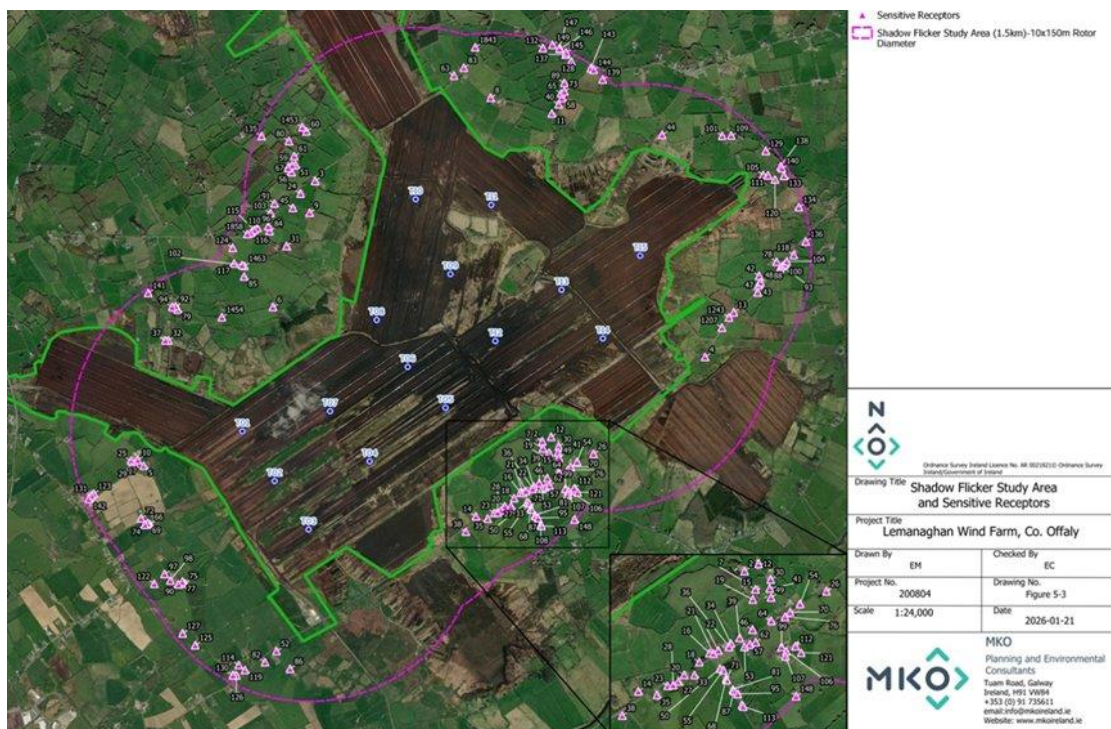
Applicant's Shadow Flicker Study Area Map Showing Our Home as Sensitive Receptor No. 62

Lemanaghan Wind Farm, Co. Offaly — Shadow Flicker Study Area (MKO, Figure 5-3, January 2026)

The maps below are reproduced from Chapter 5, page 55 of the Applicant's Environmental Impact Assessment Report, prepared by MKO Planning and Environmental Consultants (Figure 5-3, Drawing No. 200804, dated 21 January 2026). The maps show the Shadow Flicker Study Area (1.5 km radius, 10×150 m rotor diameter) and all identified Sensitive Receptors within that zone.

Our family home at Lemanaghan, Ballycumber, Co. Offaly (Eircode R35 KN52) is identified as Sensitive Receptor No. 62 in the Applicant's own assessment. As is clearly visible in the zoomed map below, house No. 62 falls within the Applicant's Shadow Flicker Study Area and is identified by the Applicant as a sensitive receptor requiring assessment. This is the Applicant's own mapping and demonstrates that our home is a directly relevant residential receptor for the assessment of shadow flicker, human health, residential amenity and cumulative effects. If the Applicant's detailed shadow-flicker tables predict actual flicker at Receptor No. 62, those figures should be read together with this appendix.

Figure 5-3 (Full) — Shadow Flicker Study Area and Sensitive Receptors



Shadow Flicker Study Area (1.5 km, 10×150 m rotor diameter) and all Sensitive Receptors identified by the Applicant. Source: MKO Planning and Environmental Consultants, Figure 5-3, Lemanaghan Wind Farm EIA Report, January 2026.

Figure 5-3 (Zoomed) — Our Home: Sensitive Receptor No. 62



Close-up of the Applicant's Shadow Flicker map showing the cluster of sensitive receptors in our area. Our family home is identified as Sensitive Receptor No. 62, clearly falling within the Shadow Flicker Study Area. The Applicant's own mapping confirms that house No. 62 is within the Shadow Flicker Study Area and should be treated as a directly relevant receptor for assessment.

This appendix is submitted in support of our request to be treated as a specific sensitive residential receptor for the assessment of noise, shadow flicker, visual impact, residential amenity and human health. The nearest proposed turbine to our home is T05, at approximately 1.086 km.

Denise Casey and Simon Casey, Lemanaghan, Ballycumber, Co. Offaly, R35 KN52.