



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

Ian Reams

(b) Observer's
postal address

Derrica Mór, Ferbane, Co. Offaly. R42 RC56

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

Not Applicable

(b) Agent's postal
address

Not Applicable

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)

324161

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

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

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

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

Lemanaghan and surrounding townlands, 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).

Ecology

Otters

The report has undertaken its analysis using selected “survey site” locations, typically accessible by public road. This fails to collate an overarching view of aquatic life using the wider footprint of the area. Notable in this regard is references to Otters. These mammals frequent the river Brosna and use the streams in its vicinity. River sightings and road kills along the R436 in recent years have indicated that the Kilcolgan Beg stream [B9] is a route used, and likely correlated with access to P1, P2, & P3 further supported by evidence of Brown Trout, Three-spined stickleback, and Red-listed European eel. As per the NPWS “Otter Survey of Ireland 2023-24”, siltation and water abstraction poses a substantial risk for these mammals. Unmaintained riverbanks and water courses are preferred routes for Otters and align with the recorded local stream assessments.

Fish and Mussel

Fish routes have not been assessed to demonstrate the overall network of passage corridors regarding recorded Brown Trout and Red-listed European eel and separately, Red-listed duck mussels. Static assessments do not fully consider the importance of passage routes for these species likely effected by the footprint of the proposed development. Impact from construction and drainage on these aquatic sites requires assessment from a wider field of view, especially as siltation is cited as an inhibitor of overall water course quality, with water drainage management e.g. abstraction, also a key consideration.

Birds

Much of the survey analysis focused on breeding bird surveys between April to July, and consultation did not extend to organisations such as the National Association of Regional Game Councils (NARGC) who have ~25k members, and many with intimate knowledge and data of the area. Non-indigenous and migratory species analysis would also have added greater value, as self-restoration of the bogs post-industrial extraction, has resulted in a return of many species benefitting from the renewing habitat. Many of these locations fall within the construction zone of the proposed development. As stated in the “Lemanaghan Draft Decommissioning and Rehabilitation Plan 2024”, the bog plays host to several bird species, many red listed and protected. These numbers are growing post the cessation of peat harvesting practices by BnM.

Woodcock

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The breeding Woodcock survey does not extend to the inner areas of the proposed development where native vegetation and tree establishment has flourished. These strips are located directly within the areas of T01 to T08 inclusive and have not been transect lined within the "Breeding Woodcock Survey Area". Woodcock frequent these natural habitats at both indigenous and migratory levels, and considering their reclusive nature would have been overlooked, especially within the non-breeding winter months.

King Fisher and Barn Owl

These observations in an initial capacity were noted as, "... incidental observation[s]...". Both of these protected and vulnerable listed species have commenced their establishment in the area, mainly due to the habitat of the area becoming less disturbed and especially within the proposed development location. The incidental nature of the encounters would suggest that if undisturbed, these species may be more established than surveyed and would flourish. Development of the site could pose a risk to these protected and vulnerable birds. Effects on these species goes beyond impact strikes, and links also to habitat disturbance and direct food source impacts from the proposed development (Soubelet, et al., 2024).

Crane

Bog sites have recently proven favourable locations for Crane species, especially the Common Crane as now established at Blackwater Bog. The proposed wind farm development at Lemanaghan bog significantly reduces any likelihood of establishment of these rare birds. The BnM Peatland Climate Action Scheme references the benefits of such initiatives when bogs are managed properly and the rate of such wind farm development in Offaly, and this midland locations in particular, undermines these efforts. The survey does not allow for such future inhabiting estimations should the bog be returned to nature.

Bats and Lapwing

The area has a well-established Bat population, and the survey does not report any Bat sightings or attempted assessment of same. Bats are especially susceptible to such developments and their associated impacts and habitat level (Jia, et al., 2024; Sander, et al., 2024). Lapwing populations also benefit from the improved breeding habitat that such bog environments are providing. While the survey assessed Lapwing it indicates a direct impact as population numbers appear increasing in the undisturbed bog, with several sightings in close proximity to the proposed turbine locations in the southwest.

Badgers

The survey data appears not to have reviewed the impact to the local Badger population. The effects of wind turbines on the stress levels of Badgers has been reported as significant (Agnew, et al., 2016). As there is an extensive focus on the effects of TB on the farming population, such stress levels on Badgers could increase the risk of infection and disease. This poses a significant concern for both wildlife and human agricultural activity collectively.

Deer

The bog and area in general now plays host a healthy Fallow Deer population. These have not featured directly in the studies and should be afforded the opportunity to grow naturally. These species have also flourished since BnM peat

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activities have ceased. Similar to Badgers, the effects from wind turbines has not been assessed on these species, or the indirect impact from habitat change (Jia, et al., 2024).

Conclusion

The above represents a spot analysis of the reported findings. The bog assessed is in a cycle of natural regeneration, while what was surveyed represents its current status post-industrial peat extraction which ended only a few short years ago. Should this bog be afforded the opportunity to remain in a natural or supported growth pattern, the coming years will see a habitat establishing that will flourish, and not unlike other bogs in the locality that have been afforded such an opportunity. The interrelationships of collective wind farm development and bog habitat rehabilitation are not positively linked. It should be noted also that preceding industrial peat extraction practices where these bogs were extensively drained by BnM, they held several fish species including Trout. These too should feature in any rehabilitation plan.

Human and Animal Health

Shadow Flicker

Shadow flicker will occur in most homes with windows positioned northeast of the wind turbines, especially T01 to T04 inclusive and T07. These homes will have direct visibility of the turbines with wing tip heights of 220 meters. While mitigations are suggested within the documents, reliance on weather, cloud cover, and room blinds or curtains is insufficient, and there is no natural screening in this vicinity, nor suitable location to create a mitigation. Most of these homes have high usage rooms such as kitchens, bedrooms, and living rooms facing towards the rising sun in the east, with the wind turbines positioned between both. In this case the risk needs to be eliminated, not mitigated through home furnishings. The prevailing wind direction would likely be westerly or south-westerly and face on for these homes. The current likelihood of turbine operational wind speeds should be assessed, in contrast to a theoretical model from the DoEHLG in 2006. The Operational Phase conclusion relating to shadow flicker heavily references cumulative shadow flicker against the Bellair Wind Farm, the individual effects require more detail here. Receptors were not placed in the vicinity of some homes affected.

The report states that, “[t]here is no credible scientific evidence to link wind turbines with adverse health effects” (MKO, 2026, p. 105). Research in this area in at an early stage and any stated absence does not correlate or determine causation with no health effects. Several studies do indicate annoyance and increased stress levels associated with such developments, which by direct effect can cause health issues (Knopper & Ollson, 2011; Jeffery, et al., 2013; Knopper, et al., 2014).

Animals

The report references that no registered equine businesses exist in the area. Regardless of this, animal health should be assessed as they may occupy adjacent lands. Several fields in the area have horses grazing throughout the year.

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Construction Traffic Risk

No assessment has been provided that assess any proposed assess/egress routes for large construction traffic such as raw material trucks entering and leaving the sites. Recent BnM wind turbine developments in the area have created substantial traffic volumes especially from large trucks delivering raw materials such as stone and rock. Many roads in the vicinity are rural, and this poses higher than normal risk.

Local Heritage

Lemanaghan Bog represents a significant archaeological and local heritage site and falls within the proposed development. This is an invaluable archaeological site that is deeply imbedded in Irish history and widely publicised in both media and publication. Recent findings as a result of storm Éowyn has further underpinned its significance as featured in RTE reports (RTÉ, 2026).

House Price Effects

Recent scientific evidence has shown that house prices decline in proximity to operating wind farms with no evidence of price adjustments over time (Anderson, et al., 2026). This is in contrast to the report (MKO, 2026). Again, the proposed development report has stated that, "... there is insufficient evidence from the scientific literature and studies conducted..." (MKO, 2026, p. 80). There are no adequate mitigations presented to that account for this effect.

References

- Agnew, R. C. N., Smith, V. J. & Fowkes, R. C., 2016. Wind turbines cause chronic stress in badgers. *Journal of Wildlife Diseases*, 52(3), pp. 459-467.
- Anderson, M. L., Grimsrud, K. & Lindhjem, H., 2026. The effect of wind power on residential property values in Norway. *Resource and Energy Economics*, Volume 86.
- Jeffery, R. D., Frogg, C. & Horner, B., 2013. Adverse health effects of industrial wind turbines. *Canadian Family Physician*, Volume 59, pp. 473-475.
- Jia, Z. et al., 2024. Localized Eco-climatic Impacts of Onshore Wind Farms: A Review. *Journal of Resources and Ecology*, 15(1), pp. 151-160.
- Knopper, L. D. & Ollson, C. A., 2011. Health effects and wind turbines: A review of the literature. *Environmental Health*, 78(10), pp. 1-10.
- Knopper, L. D. et al., 2014. Wind turbines and human health. *Frontiers in Public Health*, 2(63), pp. 1-20.
- MKO, 2026. *Ch.5 Population and Human Health - F*, s.l.: MKO Consultants.
- RTÉ, 2026. *RTÉ Radio 1*. [Online]
Available at: <https://www.rte.ie/radio/radio1/clips/22590646/>
[Accessed 15 May 2026].
- Sander, L., Jung, C. & Schindler, D., 2024. Global Review on Environmental Impacts of Onshore Wind Energy in the Field of Tension between Human Societies and Natural Systems. *Energies*, 17(3098), pp. 1-33.
- Soubelet, H., Salomon, C. & Silvain, J., 2024. *Impacts of onshore wind energy on biodiversity. Updated knowledge.*, s.l.: Foundation for Research on Biodiversity.

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