

To: An Coimisiún Pleanála

RE: Case reference: PAX19.324161

Description: Regarding application from Bord na Mona to construction Wind Farm - 15 no. wind turbines, 220m tip height, 220kV on-site substation and associated infrastructure at Lemanaghan Bog, Co. Offaly.

From:

Name: John McEvoy

Address: Lemanaghan, Ballycumber, Co Offaly, R35E623

Personal Objection – Noise and Shadow Flicker Impact on My Home

I John McEvoy object to the proposed Lemanaghan Wind Farm on the grounds that the development would have an unacceptable impact on my home, family life, residential amenity, health and wellbeing.

I wish to make a personal objection to the proposed Lemanaghan Wind Farm. I am extremely concerned that this development would have a serious and unacceptable impact on my home, my family, my sleep, my health and wellbeing, and my peaceful enjoyment of my property. I am the 3rd generation of my family to live in Lemanaghan, I have recently moved back to the area after living in a residential area for the past number of years. As a family it has been our long-term goal to move back to Lemanaghan as it has always been a significant part of our lives.

My home is located based on my Eircode R35E623 with coordinates of:

53.29629354896724, -7.7474252823146

Using these coordinates, my dwelling is approximately:

ITM X: 616,837.80

ITM Y: 727,362.58

Based on the proposed turbine coordinates, the approximate straight-line distances from my home to each turbine are as follows:

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Turbine Approximate distance from my home

T5 886 m / 0.886 km

T12 903 m / 0.903 km

T14 972 m / 0.972 km

T13 1,256 m / 1.256 km

T6 1,322 m / 1.322 km

Three proposed turbines would be within approximately 1 kilometre of my home: T5, T12 and T14. I am also concerned about the combined effect of **all 15 turbines operating together**, not simply the nearest three.

1. Noise – Lack of Certainty for My Actual Home

I have serious concerns about the likely operational noise impact on my home.

I understand that turbine noise before construction is normally assessed by prediction modelling because the turbines are not yet operating. However, that makes it even more important that the modelling is **clear, conservative, dwelling-specific and reliable**.

I do not consider it acceptable that a family home so close to multiple 220 metre turbines should be left uncertain as to the actual level and character of noise disturbance that may be experienced.

It is not clear to me from Bord na Mona's submission that my actual dwelling has been specifically assessed at my exact home coordinates. Bord na Mona appears to rely on representative monitoring locations and modelled receptor points rather than actual noise measurement at my home.

The concern is not simply a single decibel number. Wind turbine noise can include **night-time noise, sleep disturbance, pulsing or thumping noise, low-frequency noise, tonal noise, changes in wind direction, and the cumulative effect of all turbines operating together**.

I request that An Coimisiún Pleanála require Bord na Móna to clearly demonstrate, before any permission is considered, the likely noise impact at my actual dwelling coordinates, including:

- **cumulative operational noise from all 15 turbines;**
- **the individual and combined contribution from T5, T12 and T14;**
- **night-time noise, sleep disturbance and worst-case propagation conditions;**
- **amplitude modulation, tonal noise and low-frequency noise;**
- **modelling uncertainty and confirmation that any receptor used is truly representative of my actual home.**

I do not accept that this should be left to post-operational monitoring or a future complaint process. I should not have to suffer noise disturbance first and then try to prove the harm afterwards.

2. Shadow Flicker on my home– Identified as House No. 2

I am also seriously concerned about shadow flicker.

My home has been identified as **House No. 2** in the shadow-flicker assessment. The predicted shadow-flicker impact for House No. 2 is:

78 hours 49 minutes per year from T5

The relevant Irish planning guidance is the **Wind Energy Development Guidelines 2006**, commonly referred to as the “30/30” shadow-flicker standard. This recommends that shadow flicker at neighbouring dwellings should not exceed:

30 hours per year

or

30 minutes per day

The predicted annual shadow flicker at my home is therefore **48 hours 49 minutes over and above the 30-hour annual guideline.**

This is more than two and a half times the recommended annual limit.

This is not a minor or technical issue. Shadow flicker occurs when turbine blades pass between the sun and a dwelling window, causing moving shadows to flick on and off inside or around the home. This can interfere with ordinary family life, rest, comfort, use of rooms, residential amenity and wellbeing.

I strongly object to any suggestion that this level of predicted shadow flicker could be acceptable at a family home.

3. Cumulative Shadow Flicker from Multiple Turbines

The shadow-flicker impact must not be treated as if it arises from one turbine only.

My home would be approximately **886 metres from T5, 903 metres from T12 and 972 metres from T14**. These three turbines are all within approximately 1 kilometre of my home.

The important planning issue is the **total cumulative shadow flicker experienced at my dwelling**, not merely the effect from the nearest or worst turbine. The 30 hours per year / 30 minutes per day standard is a protection for the **dwelling**, not a separate allowance for each turbine.

If the figure of **78 hours 49 minutes per year** relates to **T5 alone**, then the assessment is incomplete unless it also shows the additional contribution from **T12, T14 and any other turbine capable of affecting my home.**

If the figure is intended to be the total cumulative figure from all turbines, Bord na Móna should be required to state that clearly and provide the full breakdown by turbine, date, time of day, duration and maximum daily impact.

I request that An Coimisiún Pleanála require Bord na Móna to provide, for House No. 2:

- **total cumulative annual and maximum daily shadow flicker from all relevant turbines;**
- **a turbine-by-turbine breakdown, including T5, T12 and T14;**
- **dates, times, duration, rooms/windows assessed and assumptions used;**
- **clear shut-down or curtailment measures;**
- **confirmation that my home will not exceed 30 hours per year or 30 minutes per day.**

Bord na Mona's own figures already show a serious predicted exceedance at my home. This impact must be prevented before permission is granted.

4. Human Health, Home and Family Life

This is my home. It is where my family live, rest and sleep.

Our family members all work full-time in demanding roles involving manual labour, technical qualifications, and infrastructure-related work, where concentration, accuracy, and physical wellbeing are essential on a daily basis. We are concerned that ongoing exposure to turbine noise, shadow flicker, vibration, and sleep disturbance could negatively affect our ability to carry out our work safely, efficiently, and accurately. We are also deeply concerned about the wider impact this development may have on our family life, wellbeing, and ability to enjoy our home environment.

In addition, we have a parent living with dementia, and we are particularly worried about the effect that continuous turbine activity, noise, lighting, and visual movement could have on her condition and overall quality of life. People living with dementia can be especially vulnerable to environmental stressors, confusion, anxiety, agitation, and sleep disruption. We respectfully ask that these potential impacts on vulnerable residents and working families be fully considered as part of the decision-making process.

I am aware from neighbouring areas where wind turbines are already operating that turbine noise, shadow flicker, sleep disturbance, stress, annoyance and loss of residential amenity can have very serious real-world consequences for families.

I have a right to protect my home and my family before harm occurs.

Bord na Mona should not be permitted to rely on generalised modelling, proxy receptors, assumptions or future complaint procedures where people's homes, sleep, health and family life are at stake.

5. Natural landscape, wildlife, Water Systems, Heritage and Biodiversity Impact

Beyond my serious concerns regarding the potential health impacts of the proposed turbines, I also object to the significant environmental damage this development could cause to the surrounding boglands and local ecosystem. The construction of wind turbines in peatland areas is inherently destructive. Disturbance of peat bogs can release large amounts of stored carbon, methane, and dissolved organic carbon into the environment, undermining the very purpose of renewable energy projects by damaging an important natural carbon sink. The excavation required for turbine foundations, access roads, drainage systems, and cable trenches would permanently damage peat-forming habitats and alter the natural hydrology of the area through changes to drainage and water flow. I am also deeply concerned about the potential impact on my private water supply. There is an active well on my property which could be adversely affected by excavation works, silt runoff, water contamination, and drainage disruption associated with the development. In addition, the proposal poses a serious threat to local biodiversity. The boglands provide important habitat for protected wildlife, including eight red-listed bird species such as the endangered breeding Curlew, as well as bats, badgers, foxes,

and the Irish hare. The destruction and fragmentation of these habitats would have long-term ecological consequences for the area.

Finally, the development would permanently alter and industrialise an unspoiled natural landscape. While it has been stated that the turbines themselves may be largely recyclable at the end of their operational life, the extensive road networks and thousands of tonnes of concrete foundations left embedded in the bogland will not be removed without lasting environmental damage. The impact on the landscape and peatlands would therefore be irreversible.

6. Heritage

I believe the historical and archaeological significance of the area has not been given sufficient consideration. Lemanaghan Bog forms part of the ancient Slí Mór pilgrim route linking Lemanaghan with Clonmacnoise, a route dating back to the 7th century and deeply connected to the religious, cultural, and historical heritage of the region.

This landscape is of far greater importance than simply being a location for industrial development. The boglands and surrounding areas form part of a historic setting that has remained largely unchanged for centuries and continues to hold strong cultural significance for local communities. Given this rich historical background, there is clear potential for undiscovered archaeological features, historical pathways, and buried heritage sites within the proposed development area.

The large-scale excavation and ground disturbance required for turbine foundations, access roads, drainage systems, and cable infrastructure could cause irreversible damage to archaeological remains and the wider historical landscape. Once construction begins, any destruction of previously unidentified archaeological features or historic landforms cannot be undone. For this reason, I believe a far more thorough assessment of the archaeological and cultural heritage impact of this development is required before any permission should be considered.

7. Legal and Planning Protections

I request that An Coimisiún Pleanála assess my objection having regard to the following Laws and Guidelines:

EU Environmental Impact Assessment Directive 2011/92/EU, as amended by Directive 2014/52/EU

The likely significant effects of the project on population and human health must be identified, described and assessed, including cumulative effects and interactions.

Planning and Development Act 2000, as amended

The Commission must be able to reach a lawful reasoned conclusion on the significant environmental effects of the proposed development. It should not grant permission where the effects on a dwelling are uncertain or inadequately assessed.

EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports 2022

The EIAR should contain clear, adequate and relevant information to allow likely significant effects to be properly assessed, including effects on population, human health, noise, vibration and sensitive receptors.

Wind Energy Development Guidelines 2006

These guidelines recognise the need to protect neighbouring dwellings from unacceptable noise and shadow flicker, including the 30 hours per year / 30 minutes per day shadow-flicker standard.

WHO Environmental Noise Guidelines 2018

These are relevant to understanding that environmental noise can affect health, sleep and wellbeing, particularly at night.

6. Request to the Commission

For the reasons set out above, I respectfully request that An Coimisiún Pleanála **refuse permission** for the proposed development.

In the alternative, I request that the Commission require substantial redesign of the layout, including removal or relocation of turbines affecting my home, particularly **T5, T12 and T14**, and any other turbine contributing materially to noise or shadow flicker at my dwelling.

I do not accept that post-operational monitoring or complaint procedures are adequate protection. The likely effects on my home must be fully assessed and prevented before consent is granted.

As currently proposed, this development would place **three very large turbines within approximately 1 kilometre of my home** and would expose my dwelling to **predicted shadow flicker far above the applicable guideline**. I believe this is unacceptable and would seriously interfere with my home, family life, sleep, health, comfort and residential amenity.

Yours sincerely,

John McEvoy