

An Coimisiún Pleanála,  
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AN COIMISIÚN PLEANÁLA	
LDG-	<u>-087901-26</u>
ACP-	_____
18 MAY 2026	
Fee: €	<u>50</u> Type: <u>PMO</u>
Time:	<u>9:15</u> By: <u>RUG POST</u>

Pleanála Ref: ~~PCX19.342161~~ PCX19.324161

Re: Proposed wind farm of 15 turbines, a permanent 220kV on site substation and associated infrastructure etc.  
Applicant: Lemanaghan Wind Farm DAC.

From: Marian Corcoran,  
Lemanaghan,  
Ballycumber,  
Co Offaly.  
R35DN40

Dear Sir/Madam,

I am making a submission/observation on the above SID application. I enclose fee of €50.

**1. Significant visual intrusion Ballylin / Ferbane edge.**

Appendix 14.3, VP09 Ballylin, pp.17-18: 13 of 15 turbines visible, nearest 1.6km away; residential receptors are "High" sensitivity; effect is assessed as = **High x Moderate Moderate = Significant**. This supports refusal on unacceptable local visual amenity impact.

**2. Significant impact at Lemanaghan Monastic Site.**

Appendix 14-3, VP13, pp. 24-26: NMS-requested viewpoint, 1.2km from T5, "High" sensitivity; turbines occupy the whole 53.5- degree field of view; assessed as **Significant**. This is a key landscape/heritage-setting refusal ground.

### **3. Significant residential/school-area impact at Straduff.**

Appendix 14-3, VP16, pp.30-31: 12 of 15 turbines visible, residential receptors “High” sensitivity, local school “Medium”; effect assessed as **High x Moderate = Significant**.

### **4. St Manchan’s Cemetery / Pilgrim’s Road impact is understated.**

Appendix 14-3, VP07, pp.14-15: high-sensitivity cemetery, nearby residences and Pilgrim’s Road; T14 and T15 visible to full extent; effect assessed as Moderate. This can be argued as unacceptable intrusion on a sensitive cultural/recreational landscape, even if the applicant down-rates it after “mitigation”.

### **5. Photomontages appear to understate visual dominance.**

The methodology says turbines are coloured to balance “sufficient contrast” with “life-like” presentation, but the actual images often show pale/low-contrast turbines against bright sky, making 220m turbines look less intrusive than they may appear in real conditions. See VP09 Ballylin and VP13 Monastic Site screenshots.

### **6. Heavy reliance on screening is weak.**

The LVIA itself admits screening depends on vegetation, buildings and seasonal foliage, while winter views at VP13 show increased openness. Such screening is not permanent or reliable mitigation for 220m turbines in a local historic landscape.

The application should be refused because the EIAR itself identifies significant visual effects at Ballylin, Lemanaghan Monastic Site and Straduff, and moderate effects at other highly sensitive cultural receptors. The photomontages and screening assumptions understate the true intrusion of 15 turbines up to 220m high into the local landscape and heritage setting.”

### **Intrusion On Monastic Site**

The photomontage 5a (VP5A) from the St.Manchan's site(a National Monument) Looking northwest toward the proposed wind farm site claim to encompass the complete effect of the visual infringement on the monastic site.

The model utilised by the applicant does not consider the visual

impact from the holiest section of the complex, specifically St. Manchan's holy well, which attracts several hundred worshippers each year.

The photomontage provided by the applicant does not address the visual influence of these gigantic turbines on the most secluded part of the site.

This very secluded area, known as St. Mellas Cell, includes an enclosure and oratory, as well as a newly found medieval burial site, is located 900 meters from the main road.

People visit this site year-round to enjoy its serene and tranquil atmosphere. Partly encircled by mature trees, this location possesses great aesthetic charm.

When visitors gaze to the north across the bog, they can see St. Manchan's church at Boher Fada, which houses the artefact recognised as St. Manchan's shrine.

The shrine is a remarkable example of early Irish metalwork and serves as a connection between Leamonaghan and Clonmacnoise, where it is believed to have been crafted.

The shrine also holds significant importance as a relic, as it contains some of the bones of St. Manchan.

Its existence in the parish demonstrates the ongoing dedication to the remembrance of the saint, a devotion that may extend a thousand years.

If the view of St. Manchan's Church is blocked by the wind turbines, positioned between St. Mellas Cell, which historically served as a safe haven for the shrine during the turmoil of the mid 17th century, and the contemporary church, this will create a disconnection and disrupt a long-standing tradition.

To disrupt this long-standing tradition of observing the modern church-- which contains the shrine-- from the medieval oratory that was once the residence of the artefact for many generations, would violate Article 10 of the European Union's Charter of Fundamental Rights since it would disrupt a customary religious practice.

Both private and public manifestations of religious practice are covered by Article 10 of the Charter.

The applicant neglected to create a photomontage on the public road from the nearby Camworth hill, which provides a broad view of the monastic complex and Leamonaghan bog.

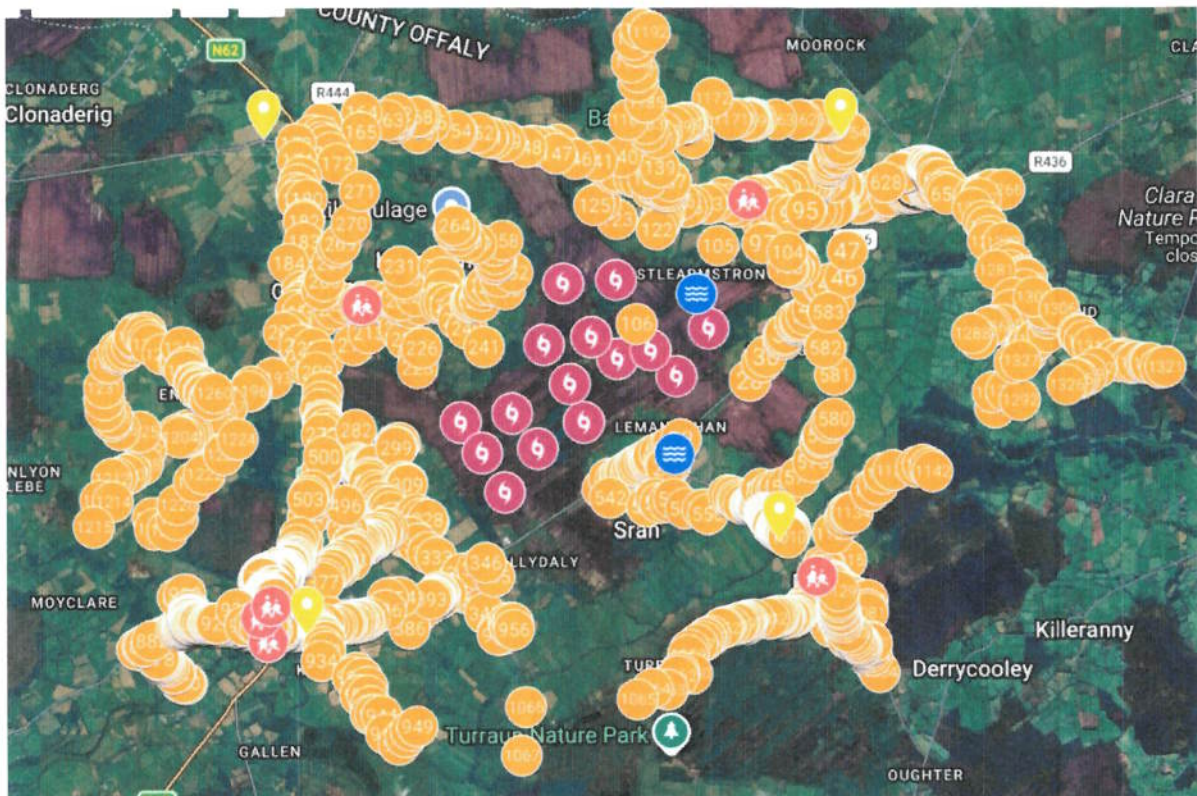
If this were carried out, it would unmistakably show the massive visual intrusion on the Leamonaghan monastic complex.

The substantial detrimental impact on archaeological heritage was one of the reasons the planning board denied planning approval for Kilranelagh wind farm in County Wicklow (Case Ref: PL 27.307372).

Therefore, I propose that the Leamonaghan Wind Farm application should follow the same logic. This application should be denied.

### **Intrusion On Residential Amenities**

The proposed application is in a residential area where there are over 1300 homes within 5 kilometres of the proposed development. As Offaly is one of the counties which is lifting way above its weight in renewable energy, it is paying for this load with a large number of wind farm neighbours who are suffering ill health and nuisance from an overload of wind farms.



Please use the Google map link to clarify.

<https://bit.ly/4nfNpIk>

It is also important to note that there are 6 schools located within 3 kilometres of the proposed development, 4 of which have special units which are very vulnerable to flicker noise and infrasound.

The holy well – St. Manchan’s – and the well serving the local community are also issues of great concern.

### **Health Issues -Due To Intrusion**

I submit that the health dimension must be treated as a central planning issue rather than a secondary amenity matter. The planning material already indicates that the wider project is adjacent to the communities of Ballycumber, Ferbane and Pollagh, and that concerns have been raised locally regarding sleep, health and mental health. The planner’s own report also acknowledges that renewable-energy development in this area must address impacts on human health from noise disturbance, with reference to the World Health Organization’s 2018 Environmental Noise Guidelines for the European Region, together with shadow flicker and related effects.

In those circumstances, there is a clear obligation to carry out a rigorous and evidence-based assessment of likely health effects before any windfarm proposal is advanced or determined.

The principal health concern is sleep disturbance arising from turbine noise, including night-time aerodynamic noise, tonal or amplitude-modulated noise, low-frequency characteristics, and repeated noise events during particular wind conditions. In a quiet rural environment, even modest increases in night-time noise can affect the ability of residents to fall asleep, remain asleep, or achieve restorative sleep. Sleep disruption is not a trivial matter. It has implications for stress, concentration, mood, cardiovascular strain, and overall quality of life. Any assessment should therefore examine predicted internal and external night-time noise levels at all nearby dwellings, not merely average daytime levels or modelled compliance at a small number of representative points.

A second major concern is the effect of chronic noise exposure on mental well-being and community health. Where residents experience ongoing uncertainty, loss of tranquillity, and repeated disturbance, the result may be annoyance, stress, anxiety, reduced enjoyment of home, and deterioration in mental well-being. In rural areas, the home environment is particularly important as a place of quiet, recovery and rest. A planning assessment that focuses narrowly on technical compliance without considering real-life impacts on nearby households would be inadequate.

A third concern is shadow flicker and blade glint. Intermittent shadow effects can be distressing and disruptive, particularly in homes with a direct line of sight to turbines or where windows, living spaces, kitchens, workspaces or bedrooms are affected at certain times of the year. Even where effects are episodic, they may still undermine residential amenity and wellbeing. A proper assessment should identify every dwelling within the relevant study area, model the likely frequency and duration of flicker events, and provide enforceable mitigation and shut-down protocols where necessary.

A fourth concern is visual dominance and the resulting effect on psychological well-being. The planning material for the associated Lemanaghan file already records concerns about visual intrusion and nuisance arising from the existing mast. A wind farm would represent a much larger and more intensive form of infrastructure. Large turbines in an

open bog landscape can alter people's sense of place, increase feelings of industrialisation of the rural environment, and reduce the tranquillity that contributes to mental wellbeing. These effects may be particularly acute where residents have long-standing cultural, historical or family connections to the landscape.

A fifth concern is cumulative impact. The relevant question is not only the effect of each turbine in isolation, but the combined effect of turbine noise, aviation lighting, shadow flicker, construction traffic, road alterations, and ongoing maintenance movements over time. Repeated or overlapping impacts can produce a materially greater burden on health and well-being than each factor considered separately. A cumulative health assessment should therefore be required.

Construction-phase effects also deserve careful attention. These include noise, dust, heavy goods vehicle movements, road safety concerns, vibration, stress associated with prolonged works, and disruption to daily life. For older residents, children, shift workers, people working from home, and those with pre-existing health conditions, these effects may be more significant. Construction management should therefore be assessed not simply as an engineering issue but as a public-health issue.

The peatland setting gives rise to further concern. Disturbance of peatland and associated ground conditions may have implications for dust, water quality, runoff, and habitat disruption, all of which can affect human wellbeing directly or indirectly. In addition, where peatland is culturally and environmentally sensitive, the degradation of that environment may itself have consequences for community wellbeing, recreation, and sense of place.

I submit that the following should be required before any consent is considered:


1. A robust, site-specific human health assessment, not a generic statement that effects will be acceptable.
2. A detailed noise impact assessment that specifically addresses night-time impacts, low-frequency noise, tonal noise, amplitude modulation, and cumulative effects.

3. Explicit assessment against the WHO 2018 Environmental Noise Guidelines for the European Region.
4. A full shadow flicker assessment for all potentially affected dwellings, with enforceable mitigation measures.
5. A clear setback analysis identifying all nearby homes and sensitive receptors.
6. Assessment of aviation and other lighting impacts on night-time amenity, sleep and wellbeing.
7. A construction traffic, dust and vibration assessment focused on nearby residents and vulnerable groups.
8. A cumulative impact assessment covering all phases of development and operation.
9. A complaint-response and post-construction monitoring regime, with independent verification and enforceable corrective measures.

In summary, the likely health concerns associated with the Lemanaghan windfarm include sleep disturbance, noise-related stress, mental-health and wellbeing effects, shadow flicker impacts, lighting nuisance, loss of tranquillity, and cumulative burdens on nearby communities. Given that these issues have already been raised in the associated planning file, and given the planner's own acknowledgement that health impacts from noise and shadow flicker require consideration, it would be premature and unsafe to proceed without a comprehensive and transparent health-focused assessment.

I respectfully request that these health concerns be given substantial weight in the planning process and that no permission be granted unless and until they have been fully examined and shown, on objective evidence, not to give rise to unacceptable effects on residents or nearby communities.

Yours faithfully,

  
[Marian Corcoran]

[Lemanaghan Ballycumber Co. Offaly]

[6<sup>th</sup>. May 2026]