

**To:** An Coimisiún Pleanála

**Re:** Proposed Lemanaghan Wind Farm, Co. Offaly

**Applicant:** Bord na Móna / SSE

**Case Reference:** PAX19.324161

**State the subject matter of the observation:** Third Party Observation To An Coimisiún Pleanála In Respect Of An Coimisiún Pleanála

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**For** Proposed Development Of 15 No. Wind Turbines, A Permanent 220kv On-Site Substation, And Associated Infrastructure At Lemanaghan And Surrounding Townlands, Co. Offaly. ([Www.Lemanaghanwindfarmplanning.ie](http://www.Lemanaghanwindfarmplanning.ie))

**Location Of Development:** Lemanaghan And Surrounding Townlands, Co. Offaly. ([Www.Lemanaghanwindfarmplanning.ie](http://www.Lemanaghanwindfarmplanning.ie)).

**Local Authority Area:** Offaly County Council.

**Name Of Assessing Authority:** An Coimisiún Pleanála.

**Enclose/Pay The Correct Fee For The Third Party Observation:** Based On The Renewable Energy Directive (Red) Iii Information Guide Published In March 2026, The Fee For Making A Submission Or Observation On A Renewable Energy Development Application Is €50.

**Submitted by:** Maura & Stephen Higgins

**Address:** Grogan, Ballycumber, Co. Offaly

**Eircode:** R35 FK49

Dear An Coimisiún Pleanála,

We wish to formally object to the proposed Lemanaghan Wind Farm development and respectfully request that An Coimisiún Pleanála **refuse** planning permission for this project.

Our objection is based on concerns regarding cultural heritage, landscape character, community identity, biodiversity, peatland protection, residential amenity, human wellbeing and the long-term sustainability of this unique environment.

We are a farming family and have spent our lives living and working within this landscape. Farming is not simply our occupation; it is our way of life. We work with animals, care for land and spend long hours outdoors from early morning until late evening. We live with nature and alongside nature. The rhythm of our lives follows the seasons, weather patterns and the landscape itself.

This land was our inheritance, passed down through generations before us. We always hoped that one day it would become our children's inheritance too — not an industrial landscape overshadowed by wind turbines and associated infrastructure, but a living, workable farm where future generations can continue to live, work and remain connected to the land, heritage and community that shaped them.

This landscape is not an empty site available for industrial development.

This is our home.

It is a living cultural landscape shaped by people, faith, nature and community over thousands of years.

The area surrounding Lemanaghan, Boher and St Manchan's monastic landscape represents one of Offaly's most important interconnected cultural and historical environments. The relationship between St Manchan's Shrine, Boher Church, Lemanaghan Monastic Site and the surrounding landscape demonstrates that these places are not isolated monuments but form part of a wider cultural system that evolved together over centuries.

The ancient Slí Mhór route connected people and communities across Ireland and passed through this landscape, linking monastic settlements and pilgrimage routes. Ancient pathways crossed through bog landscapes long before modern roads existed. People travelled through these landscapes for prayer, pilgrimage and community gathering.

The bog itself has therefore never been separate from our community. It has always formed part of our identity.

Boher Graveyard and Lemanaghan Graveyard are not merely geographical sites; they remain active places of memory, family connection and community significance.

Lemanaghan continues to function as a place of gathering and spirituality today. Easter morning dawn Mass held in Boher area demonstrates the continuing importance of this landscape to local communities. Families gather in the early morning surrounded by quietness, birdsong and a peaceful atmosphere unique to this place.

The sound of birds across the bog, the open landscape and the peace of the environment itself form part of that experience.

This cannot be measured in drawings, noise contour maps or visual assessments.

The proposed development would fundamentally alter the character of this environment.

The introduction of fifteen industrial-scale turbines together with associated roads, concrete foundations, substations, lighting and infrastructure would transform a peaceful cultural landscape into an industrial energy landscape.

People choose to live in rural communities because of:

- peace and quiet;
- connection to nature;
- dark skies;
- landscape character;

- cultural identity;
- family and community connections.

We did not choose industrialisation.

We never asked for this development.

We feel strongly that meaningful engagement has not occurred. Since this proposal first emerged in 2021, many residents have repeatedly expressed concerns. However many people feel that their concerns have not been genuinely listened to or addressed.

Letters being distributed to some households cannot be considered meaningful consultation.

Meaningful consultation requires dialogue and engagement with communities rather than presenting communities with proposals that appear predetermined.

Large developers should not be permitted to fundamentally alter how communities live without genuinely listening to those communities.

As a farming family our concerns are not limited to what we see and hear from our windows. We work outdoors daily and spend long periods within the landscape surrounding our homes and lands. Farming families experience the rural environment continuously and may be exposed to operational effects for significantly longer periods than standard residential assumptions may consider.

We are deeply concerned regarding:

- turbine noise;
- low frequency sound concerns;
- shadow flicker impacts;
- aviation lighting;
- cumulative effects;
- loss of peace and tranquillity;
- effects on residential amenity and quality of life.

We have listened to residents living near operational wind farms elsewhere in Offaly and have heard concerns regarding sleep disturbance, headaches and reduced quality of life. These concerns should not simply be dismissed. Human wellbeing and residential amenity are legitimate planning considerations and where uncertainty exists a precautionary approach should apply. Turbines of this size, 220meters have never been seen before so close to residential properties – the impacts of them cannot be left to chance.

We are also deeply concerned regarding impacts on wildlife and biodiversity.

Lemanaghan bog and the surrounding landscape support an extraordinary range of wildlife that has been nurtured and respected by local communities for generations.

Residents regularly observe curlew, lapwing, whooper swans, buzzards and kestrels moving across the landscape. Mammals including Irish hare, badgers and bat species utilise the habitats surrounding the boglands and agricultural lands.

The area also supports pollinators, butterflies, moths and countless other invertebrate species including the bog lizard (Ireland's only native reptile ) are essential components of wider ecological systems.

The flora of the bog itself — including mosses, heathers, wetland vegetation and wildflowers — sustains these ecosystems and contributes to pollinator populations already under pressure nationally.

This landscape is not merely beautiful; it is a functioning ecological system.

Ireland is currently experiencing a biodiversity crisis.

Nature needs space to breathe and recover.

We are concerned that large-scale excavation works, concrete foundations, roads, drainage interventions and turbine operation may impact wildlife movement, breeding behaviour, feeding areas and habitat connectivity.

Lemanaghan also represents an important peatland environment.

Peatlands function as major carbon sinks and play an important role in climate regulation. Disturbance of peat systems can release stored carbon and undermine broader environmental objectives.

The proposal should also be considered having regard to relevant legal and policy obligations including:

- Planning and Development Act 2000 (as amended);
- EU Birds Directive (2009/147/EC);
- EU Habitats Directive (92/43/EEC);
- Wildlife Acts 1976–2023;
- National Biodiversity Action Plan 2023–2030;
- EU Nature Restoration Regulation;
- European Landscape Convention;
- National Climate Action and Peatland Restoration objectives.

We further request that the Board consider the proposal in light of the Wind Energy Development Guidelines for Planning Authorities (2006), which remain the principal adopted national guidance and emphasise the protection of residential amenity, landscape character, cumulative impacts and community considerations.

We also ask the Board to consider the significance of the Draft Revised Wind Energy Development Guidelines (2019). Although these revised guidelines were not formally adopted, they recognised evolving concerns regarding residential impacts and proposed stronger protections relating to noise assessment, residential amenity and community wellbeing.

The existence of these revised proposals demonstrates acknowledgement that previous approaches may not fully reflect evolving understanding regarding impacts on communities.

Where uncertainty exists, a precautionary approach should apply.

We wish to make clear that we are not opposed to renewable energy.

We recognise the need for climate action and cleaner energy generation.

However renewable energy should not come at the expense of communities, biodiversity, heritage, peatland recovery and people's quality of life.

Climate action and nature protection must work together.

Communities should not be expected to sacrifice sacred landscapes and their wellbeing for developments in unsuitable locations.

Lemanaghan Bog is not simply land.

- It is our home.
- It is our history.
- It is our heritage.
- It was our inheritance, and someday it will be our children's and grandchildren's inheritance.
- It is our place of prayer, memory and belonging.

For these reasons we respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Yours faithfully,

*Maura Higgins & Stephen Higgins.*