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An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
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Re: Objection to Proposed Lemanaghan Wind Farm, Co. Offaly.

Case Reference Number: PAX19.324161

An Coimisiún Pleanála case number for the SID application: 324161

Dear Sir/Madam,

I hereby submit a formal objection to the proposed Lemanaghan Wind Farm development.

This submission is made on the basis that the proposed development would constitute:

- a serious interference with residential amenity and quality of life
- an inappropriate industrialisation of a uniquely sensitive archaeological, monastic and cultural landscape
- a development carrying significant unresolved ecological and hydrological risks
- and a proposal which fails to satisfy the requirements of Irish planning law, European environmental law, the precautionary principle, and the standards required for lawful Environmental Impact Assessment

The proposed development includes turbines within a highly sensitive bogland landscape surrounding Lemanaghan Monastic Site — a site of exceptional archaeological, spiritual, historical and landscape significance. While I acknowledge the importance of renewable energy and national climate policy objectives, it is well-established in Irish planning law that renewable energy policy does not override sustainable development; constitutional property rights; the protection of archaeological heritage; obligations under the Habitats Directive; or the legal requirements governing Environmental Impact Assessment.

The planning system must ensure that renewable energy projects are developed in suitable locations and in a manner consistent with proper planning, sustainable development, environmental protection and the rights of local residents.

In my view, this proposal fails that test.

1. Interference with residential amenity and quality of life

1.1. Shadow Flicker

The applicant's own Environmental Impact Assessment Report (EIAR) confirms that my home at Eircode R35 K263 falls within the Shadow Flicker Study Area, as seen in Chapter 5 Population and Human Health https://www.lemanaghanwindfarmplanning.ie/wp-content/uploads/sites/52/2026/03/Chapter_05_Population_and_Human_Health.pdf. Additionally, they acknowledge that my home, marked at dwelling 64 in Table 5-9 of Chapter 5 is to be at excess of recommendations for shadow flicker. In this chapter they stated that "even if there is a bedroom on the side of the property affected, the shadow flicker may not be witnessed if curtains or blinds in the bedroom are closed". I find it deeply concerning that they imply closing the curtains in my own home as an appropriate solution to an excess amount of shadow flicker per day than recommended.

The EIAR also acknowledges:

- that shadow flicker is a recognised human health issue;
- that the HSE requested assessment and mitigation;
- and that the Draft Revised Wind Energy Guidelines recommend that no existing dwelling should experience shadow flicker. <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/draft-revised-wind-energy-development-guidelines-december-2019/>

Despite this, the applicant proposes 15 turbines.

I am extremely concerned about the long-term effect this development would have on: daily life within my home; peace and quiet; stress and anxiety levels; and the enjoyment of my property.

I strongly object to the suggestion in the EIAR that impacts can effectively be reduced because:

- residents may not be at home;
- residents may be asleep;
- or residents can close curtains or blinds.

I do not believe local residents should be expected to alter their daily lives or keep blinds closed in order to tolerate recurring shadow flicker from industrial turbines.

The EIAR admits that much of the modelling is based on assumptions and "theoretical" scenarios. The findings of a 2024 research study on residents views on wind farms highlighted that trust in information provided by developers and liaison representatives has lasting implications for community acceptance and perceived impacts over the lifetime of a wind farm project. <https://doi.org/10.1016/j.rser.2023.113839>. Providing theoretical scenarios based on out-dated sunshine averages from 1979-2008 creates significant uncertainty regarding the true level of impact residents will experience over the lifetime of the project.

I am also concerned that:

- shadow flicker impacts may worsen over time if surrounding vegetation changes;
- the modelling relies on historic sunshine averages from 1979–2008;
- and mitigation appears dependent on future operational controls rather than prevention of the impact itself.

In my view, the applicant has not demonstrated that nearby residents will be adequately protected from recurring nuisance and loss of residential amenity.

1.2. Noise, Low Frequency Sound & Loss of Rural Tranquillity

In addition to shadow flicker, I have very serious concerns regarding turbine noise and the long-term loss of rural tranquillity.

The proposed turbines are extremely large industrial structures and will operate continuously both day and night. While the applicant may claim compliance with technical noise limits, I do not believe the EIAR adequately reflects the real lived experience of residents living close to turbines of this scale.

Particular concerns include:

- continuous aerodynamic turbine noise;
- low-frequency noise;
- amplitude modulation (“swishing” or pulsing noise);
- nighttime background noise increases;
- and cumulative sensory disturbance when combined with shadow flicker and turbine movement.

These impacts are especially concerning in a quiet rural bogland landscape where existing ambient noise levels are naturally very low. Even relatively small increases in mechanical or repetitive noise can therefore become highly intrusive. The applicant’s own website confirms that the turbines would operate continuously and dominate a large bogland area extending across approximately 1,200 hectares <https://www.lemanaghanwindfarm.ie/the-project/project-overview/>.

I am concerned that:

- the applicant relies excessively on modelling rather than lived conditions;
- weather conditions can significantly affect turbine noise propagation;
- nighttime noise impacts may be underestimated;
- and cumulative impacts on sleep and mental wellbeing have not been adequately assessed.

The surrounding landscape is currently characterised by silence; openness; natural soundscapes; and absence of industrial activity. This forms part of the essential character of the area and contributes significantly to residents’ quality of life.

Even modest increases in repetitive or tonal mechanical noise therefore have the potential to become highly intrusive. The proposed development would fundamentally alter this environment for decades.

I am also concerned that:

- noise assessments may not adequately account for future maintenance degradation of turbines;
- turbine wear over time may increase operational noise;
- and residents would bear the burden of ongoing monitoring and complaints processes after the development has already been constructed.

The EIAR appears heavily focused on technical compliance thresholds, but I do not believe this sufficiently addresses the reality of living beside multiple industrial turbines in a quiet rural community. The planning system must consider not only whether a development technically complies with numerical limits, but whether it is appropriate for the receiving environment and compatible with long-term residential amenity.

Recent litigation and public controversy surrounding wind turbine nuisance issues in Ireland further demonstrate that technical compliance does not necessarily prevent significant residential impacts <https://www.irishtimes.com/crime-law/courts/2025/06/22/wexford-wind-farm-must-pay-almost-1m-towards-legal-costs-of-couple-who-won-noise-nuisance-case/>.

The Board is respectfully requested to consider the cumulative interaction between:

- noise;
- shadow flicker;
- visual dominance;
- aviation lighting;
- and psychological intrusion.

These impacts cannot properly be considered in isolation.

In my view, this proposal is not compatible with the peaceful enjoyment of nearby homes and would result in a significant and irreversible loss of rural tranquillity.

2. Inadequate human health assessment

The EIAR explicitly confirms that no standalone Health Impact Assessment (HIA) was prepared.

This omission is highly significant given:

- the scale of the turbines proposed;
- proximity to dwellings;
- acknowledged shadow flicker exposure;

- and cumulative visual and sensory impacts.

The EIAR recognises that health encompasses: “physical, mental and social well-being.”

However, the assessment inadequately addresses: chronic stress; sleep disruption; anxiety associated with repetitive shadow flicker; visual dominance; aviation lighting; cumulative psychological burden; and long-term deterioration of residential environmental quality.

The applicant relies excessively upon numerical compliance thresholds rather than lived human experience.

The Board is respectfully reminded that compliance with guidance thresholds does not automatically render impacts acceptable in planning terms. The absence of an independent HIA is particularly concerning given that:

- the development is classified as Strategic Infrastructure
- and the residents within the shadow flicker area, such as myself, will experience direct operational effects.

3. Heritage, archaeology & cultural landscape

3.1. National Importance of Lemanaghan

Lemanaghan Monastic Site constitutes one of Ireland’s most important monastic and bogland archaeological landscapes.

The Lemanaghan Heritage Conservation Plan describes the area as: “a sacred place of great antiquity”; “relatively untouched by modern life”; and possessing a rare atmosphere of peace, remoteness and spiritual isolation.

https://www.offaly.ie/app/uploads/Council/Council_Services_A-Z/Heritage_Conservation/Lemanaghan_Conservation_Plan.pdf?utm_source=chatgpt.com

The significance of Lemanaghan derives not merely from the protected structures themselves but from: the surrounding bogland setting; uninterrupted horizons; historical isolation; pilgrimage associations; and the intact relationship between monument and landscape.

The proposed turbines would irreversibly dominate this setting. Even one wind turbine would dominate the skyline over Lemanaghan monastic site which will undermine the integrity and character of this sacred location.

Additionally, there is a long history of academic and research interest in Lemanaghan and Lemanaghan Bog:

- University College Dublin. Department of **Archaeology** have produced publications about Lemanaghan Bog, with archaeologist Conor McDermott saying; “The IAWU surveys identified over 630 archaeological sites making this one of the highest densities of wetland archaeology in the world.”
 - https://scholar.googleusercontent.com/scholar?q=cache:rZzN1elbr0AJ:scholar.google.com/+Lemanaghan+archaeology&hl=en&as_sdt=0,5

- McDermott, C. (2001). Treckers through time: recent archaeological survey results from Co. Offaly, Ireland. *B. Raftery and J. Hickey (eds.). Recent Developments in Wetland Research.*
- A paper published by The Royal Society of Antiquaries of Ireland in 2020 describes the discovery of an ogham-inscribed beater in Lemanaghan bog:
 - Sikora, M., & Moore, F. (2020). A decorated and ogham-inscribed beater from Leabeg, Lemanaghan Bog, Co. Offaly. *The Journal of the Royal Society of Antiquaries of Ireland*, 150, 63–89.
<http://www.jstor.org.nuigalway.idm.oclc.org/stable/45472826>
- Another paper published by The Royal Society of Antiquaries of Ireland describes numerous slabs with inscriptions in Lemanaghan monastic site which have been linked to Clonmacnoise.
 - Crawford, H. S. (1911). The Early Slabs at Lemanaghan, King’s County. *The Journal of the Royal Society of Antiquaries of Ireland*, 1(2), 151–156.
<http://www.jstor.org.nuigalway.idm.oclc.org/stable/25514149>
- An article in Archaeology Ireland about numerous artifacts and sites discovered in Lemanaghan bog proposed that “The sites recorded to date will be included in the list of Recorded Monuments and Places and will receive protection under National Monuments legislation. It is hoped that some of the archaeological sites might also be protected by the conservation of the bogs.” Conservation of Lemanaghan Bog should involve protecting and restoring peatland ecosystems, preserving biodiversity and managing water and should not involve further destruction of bog sites for foundations of wind turbines.
 - Filling in the Blanks: An Archaeological Survey of the Lemanaghan Bogs, Co. Offaly. (1997). *Archaeology Ireland*, 11(2), 22–25.
<http://www.jstor.org.nuigalway.idm.oclc.org/stable/20562355>
- The Heritage Council in Our Ancient Landscape: Peatland Archaeology highlighted that the Tumbeagh Bog Body found in Lemanaghan is of high significance; “Ireland can also lay claim to one of the very few formal excavations of an in situ bog body, following the discovery of partial human remains in the Lemanaghan Bog complex, Co. Offaly, in 1998, during an archaeological survey of the cut-over surface of Tumbeagh Bog.”. They also referenced other artefacts found in Lemanaghan Bog that can indicate past human activity: “Some objects, for example the Fadden More Psalter, and medieval coins from Lemanaghan could have been deliberately hidden with the intention of later recovery”
 - <https://www.heritagecouncil.ie/content/files/Peatland-Archaeology.pdf>

The applicant even acknowledges the potential for further archaeology at the application site in Chapter 13 Cultural Heritage: “The presence of a large number of recorded monuments previously identified within the Application Site and the stray finds from the area including important items such as the Lemanaghan Crozier suggest that there is still a high potential for the presence of additional archaeological finds, features and structures within the peat.”

https://www.lemanaghanwindfarmplanning.ie/wp-content/uploads/sites/52/2026/03/Chapter_13_Cultural_Heritage.pdf

However, in the effects and mitigation measures to this in Section 13.4 of Chapter 13 Cultural Heritage, the applicant states: “There are a number of instances, however, where Proposed Project infrastructure interacts with the location of recorded monuments”. To build infrastructure on known locations of recorded monuments is unacceptable. The applicant also writes about the potential sub-surface archaeology claiming that if predevelopment archaeological testing and construction phase monitoring are implemented the potential effects is considered “slight or not significant”. These mitigation measures are insufficient and inadequate given the highly dense archaeological nature of Lemanaghan Bog. The ongoing pattern of discovery demonstrates precisely why a precautionary approach is required.

3.2.Failure to Properly Assess Setting Impacts

The applicant appears to substantially underestimate the significance of indirect effects upon: archaeological setting; visual integrity; and intangible cultural heritage.

The Board is respectfully reminded that Irish and European heritage protection extends beyond physical preservation of structures to include: context; visual setting; and cultural landscape character.

The proposal would:

- fundamentally alter the historic skyline;
- introduce aviation lighting into a historically dark landscape;
- and industrialise one of Ireland’s most distinctive monastic bog settings.

The proposal conflicts with:

- The European Landscape Convention; <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=176>
 - The open bog landscape contributes directly to St Manchan’s Monastic Site sense of place, tranquillity, and historical continuity. The proposal therefore conflicts with the European Landscape Convention’s requirement to protect culturally significant landscapes and respect the landscape values of local communities
- The Valletta Convention; <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=143>
 - By introducing permanent industrial infrastructure into this sensitive archaeological landscape of Lemanaghan Bog, rather than avoiding it, the proposal conflicts with the Valletta Convention’s principle that archaeological heritage should be preserved in situ wherever feasible.
- And national policy concerning protection of archaeological landscapes. <https://www.archaeology.ie/app/uploads/2024/12/framework-and-principles-for-protection-of-archaeological-heritage-1.pdf>

- The proposal conflicts with Ireland's archaeological protection framework because it would place large-scale industrial infrastructure within the wider setting of an important early medieval ecclesiastical and archaeological landscape centred on St Manchan's Monastic Site. National policy states that archaeological heritage and its landscape context are resources that should be protected through avoidance and minimal intervention, particularly in highly sensitive peatland environments. The excavation, drainage, and visual dominance associated with the wind farm would risk damaging buried archaeology, degrading the historic bog landscape, and undermining the cultural and research value of the area.

3.3. Intangible Heritage & Spiritual Landscape

The applicant's assessment appears heavily weighted toward measurable physical effects while failing to properly evaluate: spiritual significance; contemplative value; pilgrimage experience; and intangible heritage qualities.

The European Landscape Convention requires landscape to be understood as a product of both physical features and people's perception, identity, and lived experience, meaning non-visual and experiential qualities must be assessed as part of landscape impact. In this context, the Lemanaghan landscape is not merely a visual resource but a historically and spiritually significant monastic setting associated with nearby St Manchan's Monastic Site, where its value derives from centuries of religious association and quiet reflection.

The atmosphere of Lemanaghan is inseparable from: silence; openness; remoteness; and absence of industrial intrusion.

The proposed development would permanently destroy these characteristics.

4. Ecological & Peatland Impacts

The proposed development is located within a highly sensitive peatland landscape near protected bog systems including Clara Bog, Ferbane Bog and Mongan Bog. Peatlands are hydrologically complex ecosystems highly vulnerable to disturbance.

The development would involve excavation; road construction; drainage works; turbine foundations; cable trenching; and heavy construction activity.

Such works create substantial risks including peat instability; hydrological alteration; habitat fragmentation; sedimentation; and carbon release. https://www.ipcc.ie/a-to-z-peatlands/peatland-habitat-types/blanket-bogs/?utm_source=chatgpt.com

The proposal appears fundamentally inconsistent with national and EU peatland restoration policy and biodiversity objectives, and Lemanaghan Bog should be conserved for its high biodiversity value

- https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive_en
- <https://www.npws.ie/sites/default/files/publications/pdf/NationalPeatlandsStrategy2015EnglishVers.pdf>

5. Failure to meet planning requirements

5.1. Failure to Satisfy Proper Planning & Sustainable Development

Under Section 37 of the Planning and Development Act 2000 (as amended; <https://www.irishstatutebook.ie/eli/2000/act/30/section/37>), the Board must assess whether the development constitutes proper planning and sustainable development.

It is respectfully submitted that the proposed development fails this test due to:

- excessive scale;
- unacceptable impacts on residential amenity;
- adverse cultural landscape impacts;
- unresolved environmental uncertainty;
- and cumulative industrialisation of a nationally sensitive landscape.

5.2. Inadequate Environmental Impact Assessment

The Environmental Impact Assessment process must satisfy the requirements of:

- Directive 2011/92/EU as amended by Directive 2014/52/EU <https://eur-lex.europa.eu/eli/dir/2014/52/oj/eng>
- the Planning and Development Act 2000 <https://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/html>
- and relevant Irish and European case law.

It is respectfully submitted that the EIAR is deficient because:

- it relies heavily upon theoretical modelling;
- substantial uncertainty remains regarding actual operational impacts;
- cumulative impacts are inadequately assessed;
- intangible cultural heritage impacts are inadequately assessed;
- and no independent standalone Health Impact Assessment was conducted.

The EIAR repeatedly uses uncertain terminology including:

- “unlikely”;
- “theoretical”;
- “precautionary”;
- and “very low”.

This demonstrates residual uncertainty incompatible with the precautionary principle.

5.3. Precautionary Principle

The precautionary principle forms a cornerstone of European environmental law <https://eur-lex.europa.eu/EN/legal-content/glossary/precautionary-principle.html>.

Where substantial scientific uncertainty exists regarding:

- environmental effects;
- ecological effects;
- or human health impacts,

the burden rests upon the developer to demonstrate absence of harm.

It is respectfully submitted that this burden has not been discharged.

5.4. Failure to Properly Assess Alternatives

The EIA Directive (Directive 2014/52/EU <https://eur-lex.europa.eu/eli/dir/2014/52/oj/eng>) requires genuine assessment of reasonable alternatives.

The applicant appears to proceed from the assumption that the site is suitable rather than objectively evaluating:

- less sensitive locations;
- or alternative configurations avoiding major heritage impacts.

The Board is respectfully requested to critically examine whether meaningful alternatives assessment has genuinely occurred.

5.5. Material Contradiction with Heritage Protection Obligations

The proposal appears materially inconsistent with:

- The Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 <https://www.irishstatutebook.ie/eli/2023/act/26/enacted/en/html>
- the European Landscape Convention <https://www.coe.int/en/web/landscape/the-european-landscape-convention>
- the Heritage Act 2018 <https://www.irishstatutebook.ie/eli/2018/act/15/enacted/en/html>
- and national planning policy concerning archaeological landscapes <https://www.opr.ie/wp-content/uploads/2022/10/Planning-Leaflet-13-Archaeology-in-the-Planning-Process.pdf>

The Board is respectfully reminded that protected archaeological landscapes require heightened protection where developments risk irreversible setting impacts.

5.6. Constitutional Property Rights

The proposed development gives rise to serious concerns regarding:

- interference with peaceful enjoyment of property;
- private nuisance;
- and disproportionate impact upon nearby homeowners.

The Constitution <https://www.irishstatutebook.ie/eli/cons/en/html> protects private property rights subject to principles of proportionality and social justice. It is respectfully submitted that the burden imposed upon nearby residents by turbines of this scale is disproportionate and excessive.

6. Landscape & Visual Impact

The proposed turbines would become dominant industrial features visible across extensive areas of the Midlands landscape. The scale proposed is wholly incompatible with: the low-lying bog landscape; historic landscape character; and the setting of Lemanaghan.

The turbines would fundamentally alter: skyline character; visual amenity; nighttime landscape quality; and cultural landscape integrity.

Conclusion

For all of the reasons outlined above, I respectfully submit that the proposed development would:

- seriously injure residential amenity;

- adversely affect human health and wellbeing;
- irreversibly damage the archaeological and cultural landscape of Lemanaghan;
- industrialise a uniquely sensitive bogland environment;
- create unacceptable visual and cumulative impacts;
- and materially conflict with Irish and European environmental and planning law.

The proposal represents an inappropriate and unsustainable location for industrial-scale wind energy infrastructure.

Accordingly, I respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed development.

Yours faithfully,

Michelle Corcoran

Michelle Corcoran