

An Coimisiún Pleanála  
64 Marlborough St  
Dublin 2

26<sup>th</sup> May 2026

## Observation on Proposed Lemanaghan Wind Farm SID Application

Dear Sir / Madam,

**Applicant:** Lemanaghan Wind Farm DAC  
**Case Reference Number:** ACP-324161-26  
**Development:** Lemanaghan Wind Farm, Co. Offaly  
**Observer:** Midlands Airport Developments Ltd

On behalf of Midlands Airport Developments Ltd, O'Moore Hall, O'Moore Street, Tullamore, Co. Offaly. I wish to make an observation in relation to the above Strategic Infrastructure Development application. In respect of this observation we have paid the prescribed fee of €50 via the online submission portal.

It is our opinion that the proposed development seriously impacts on our ability to deliver our project to construct an airport in Offaly which was confirmed as Strategic Infrastructure Development in 2010 ref: 19.PC0074.

Our development is an international airport handling approximately 2.5 million passengers per annum can support between 5,000 and 7,000 jobs and generate in excess of €600 million in annual economic activity, with significant additional catalytic benefits in tourism, investment and business development. It is our opinion that this is a more sustainable, economically beneficial and proper planning use for the geographical advantage that Offaly represents than to consume the carrying capacity of the landscape with wind turbines.

Our proposal will generate significant employment for the region and add significantly to the regional economy far in excess of that of the proposed windfarm development. Whilst we understand the importance of wind energy for the sustainability of Irish Energy it should not be to the detriment to the development of the county of Offaly.

Our proposal is supported by Section 8.7 of the Offaly County Development Plan 2021-2027

## 8.7 Air Transport

Connectivity and access through international and regional airports are vital for our tourism industry in particular. Offaly County Council recognises the significant role that regional airports have in promoting balanced development and supports the location of an airport in the county or within the midlands.

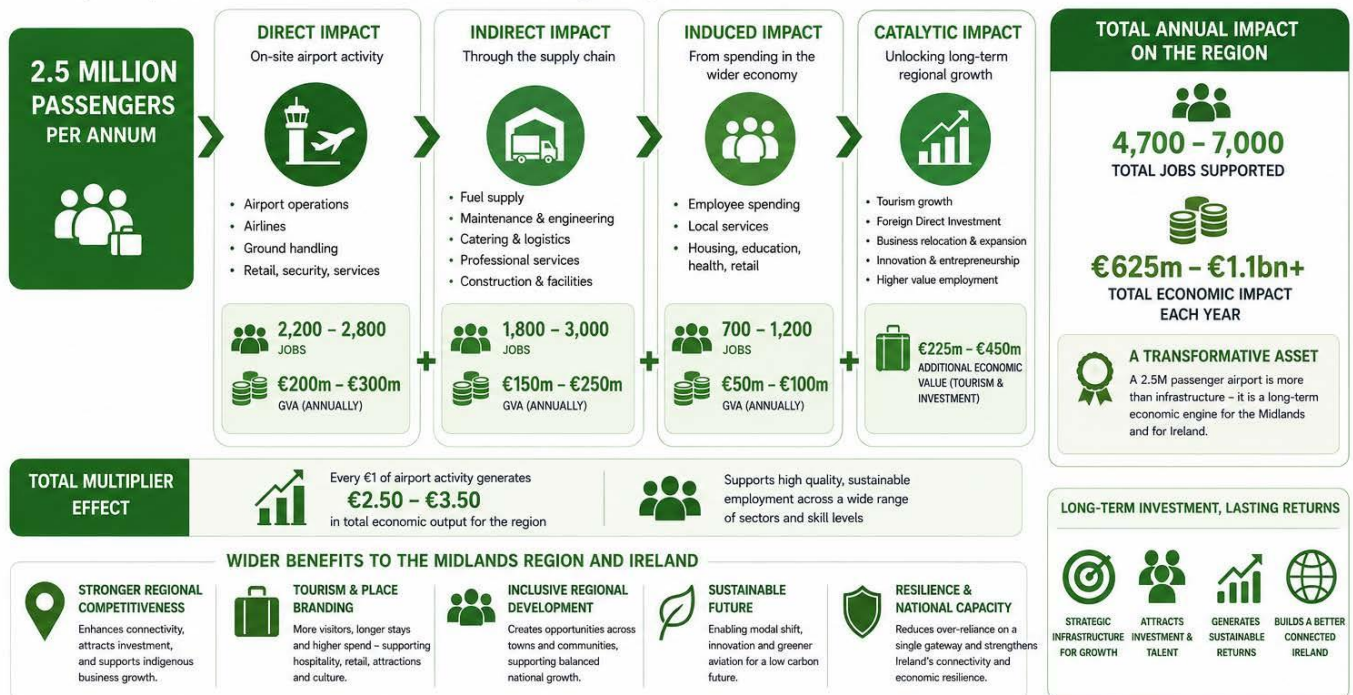
In this case we believe that the proposed development should be refused as it will significantly impact the potential of the county to grow in the future.

Our 2026 viability study confirms that our proposed development has the ability to create between 5000 and 7000 jobs for the region. It will also add between €600 million and €1billion to the regional economy every year.

# THE POWER OF CONNECTIVITY

## ECONOMIC IMPACT OF A 2.5 MILLION PASSENGER AIRPORT

A catalyst for jobs, investment, tourism and sustainable regional growth



“ A 2.5 million passenger airport is a catalyst for prosperity – connecting people, business and opportunity, and delivering lasting economic, social and environmental value for Ireland.

SOURCES:  
Airports Council International (ACI) Europe, Eurocontrol, UK CAA Airport Economic Impact Study, InterVISTAS, CSO, tourism research and regional airport benchmarks.

In contrast the Applicants Planning report states that the construction phase of the proposed development will create between 100-120 jobs for the two years of the construction phase. The report does not state a specific figure of long term jobs post construction.

The report also refers to the significant investment being made but only identifies approximately €8million over the first 15 years (€533,333 per annum) in local community benefit.

In addition we have two main points to our objection to the proposed development. These are as follows

1. Conflict with Midlands Airport Airspace
2. Project splitting.

- **1. Conflict with Midlands Airport Airspace Safeguarding**

The proposed development raises serious concerns regarding its potential impact on the safeguarded airspace associated with the proposed Midlands Airport development. The scale of the turbines proposed, specifically 15 no. turbines with a blade tip height of 220 metres, together with associated telecommunications and grid infrastructure, has the potential to materially interfere with aviation safeguarding surfaces, obstacle limitation surfaces, radar operations, navigational procedures and future operational flexibility associated with the airport proposal.

The Irish Aviation Authority recommend the use of the ICAO technical Annex 14 and 15 in defining the obstacles within airspace around airports. Their guidance material has been prepared for use with Statutory Instruments S.I. 423 of 1999 Irish Aviation Authority (En Route Obstacles to Air Navigation) Order 1999 and S.I. 14 of 2002 Irish Aviation Authority (Obstacles to Aircraft in Flight) Order 2002 for the definition of protected surfaces in the vicinity of aerodromes.

In addition to the requirements prescribed in their guidance material they note it may be necessary to call for other restrictions to development on and in the vicinity of the aerodrome in order to protect the performance of visual and electronic aids to navigation and to ensure that such development does not affect instrument approach procedures and associated obstacle clearance limits.

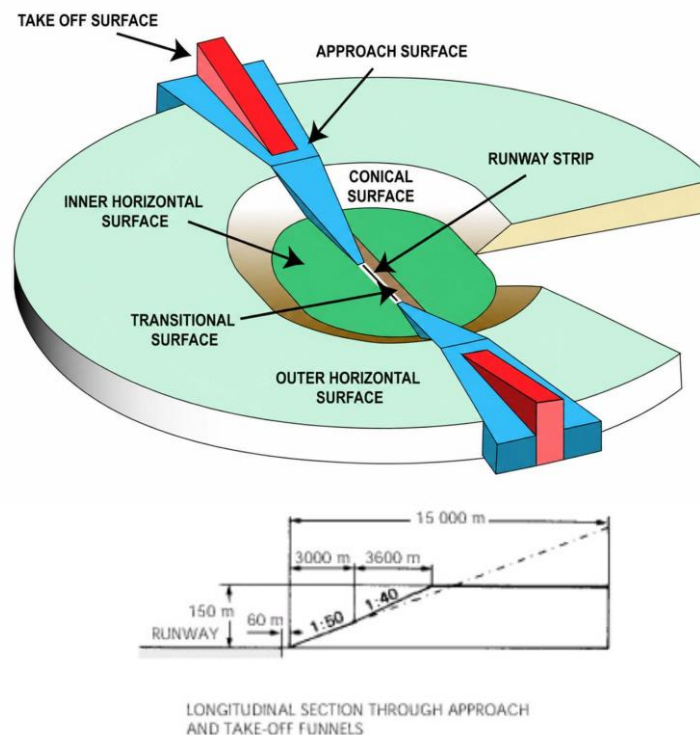
The objectives of the specifications in this guidance material are to define the airspace around aerodromes to be maintained free from obstacles so as to permit the intended airplane operations at the aerodromes to be conducted safely and to prevent the aerodromes from becoming unusable by the growth of obstacles around the aerodromes. This is achieved by establishing a series of obstacle limitation surfaces that define the limits to which objects may project into the airspace.

An outer horizontal surface is a specified portion of a horizontal plane around an aerodrome beyond the limits of the conical surface. It represents the level above which consideration needs to be given to the control of obstacles in order to facilitate practicable and efficient instrument approach procedures and together with the conical and inner horizontal surface to ensure safe visual maneuvering in the vicinity of the aerodrome.

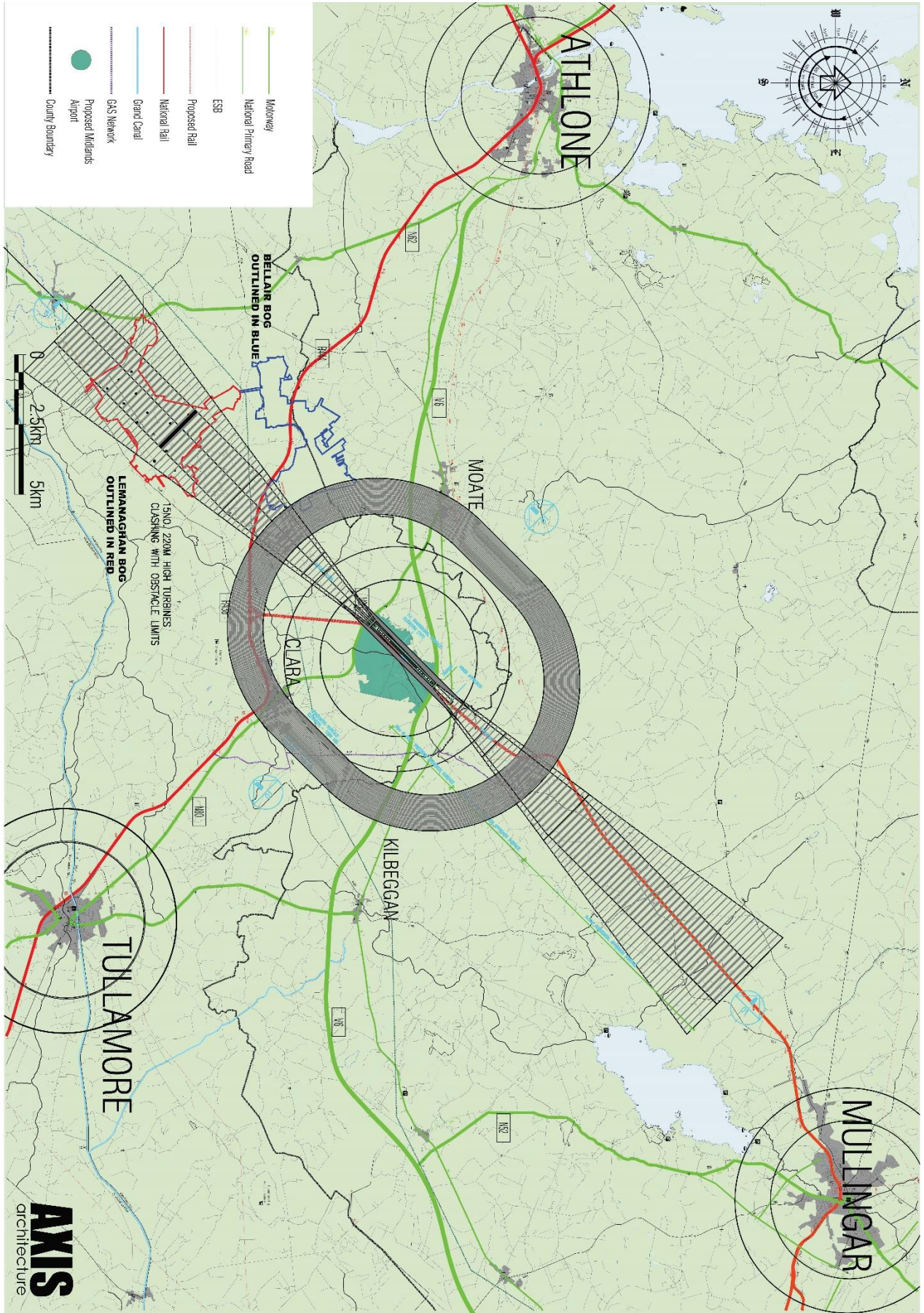
As a broad specification, the outer horizontal surface should extend from the periphery of the conical surface to a minimum radius of 15,000 m from the aerodrome reference point where the runway code number is 3 or 4 such as the one proposed at the Midlands Airport. It may need to be extended to coincide with the obstacle accountable areas of PANS-OPS for the individual approach procedures at the aerodrome under consideration.

These obstacles free zones can be represented in the diagram below made up of the

- Runway strip: 3600m runway length
- Transitional surface : 60m sloped
- Inner Horizontal surface : 45m High at Radius 4000m
- Conical Surface : 155m
- Outer Horizontal Surface : 150m high
- Approach Surface : 150m high total length 15000m
- Take off Surface : sloped total length 15000m



The specific geographic areas are represented in the map below. This map shows the location of the airport, the runway and the obstacle free zone. From assessment of this it can be clearly seen that all 15 of the proposed 220m turbines are located within the obstacle free zone.



The applicants Planning Report references aviation as a topic discussed during pre-application consultation with An Coimisiún Pleanála, however there is insufficient evidence that the cumulative implications for the proposed Midlands Airport development have been properly assessed.

Given the strategic significance of Midlands Airport to regional connectivity, economic development and national aviation infrastructure, the Board must ensure that renewable energy development does not sterilise or prejudice the future operation or expansion of aviation infrastructure in the Midlands region.

The EIAR and Planning Report fail to adequately demonstrate:

- that the proposed turbines will not interfere with safeguarded aviation corridors;
- that aviation radar and navigation impacts have been fully assessed;
- that future aviation operational constraints have been considered; and
- that cumulative aviation impacts arising from multiple proposed wind energy developments in the Midlands have been comprehensively evaluated.

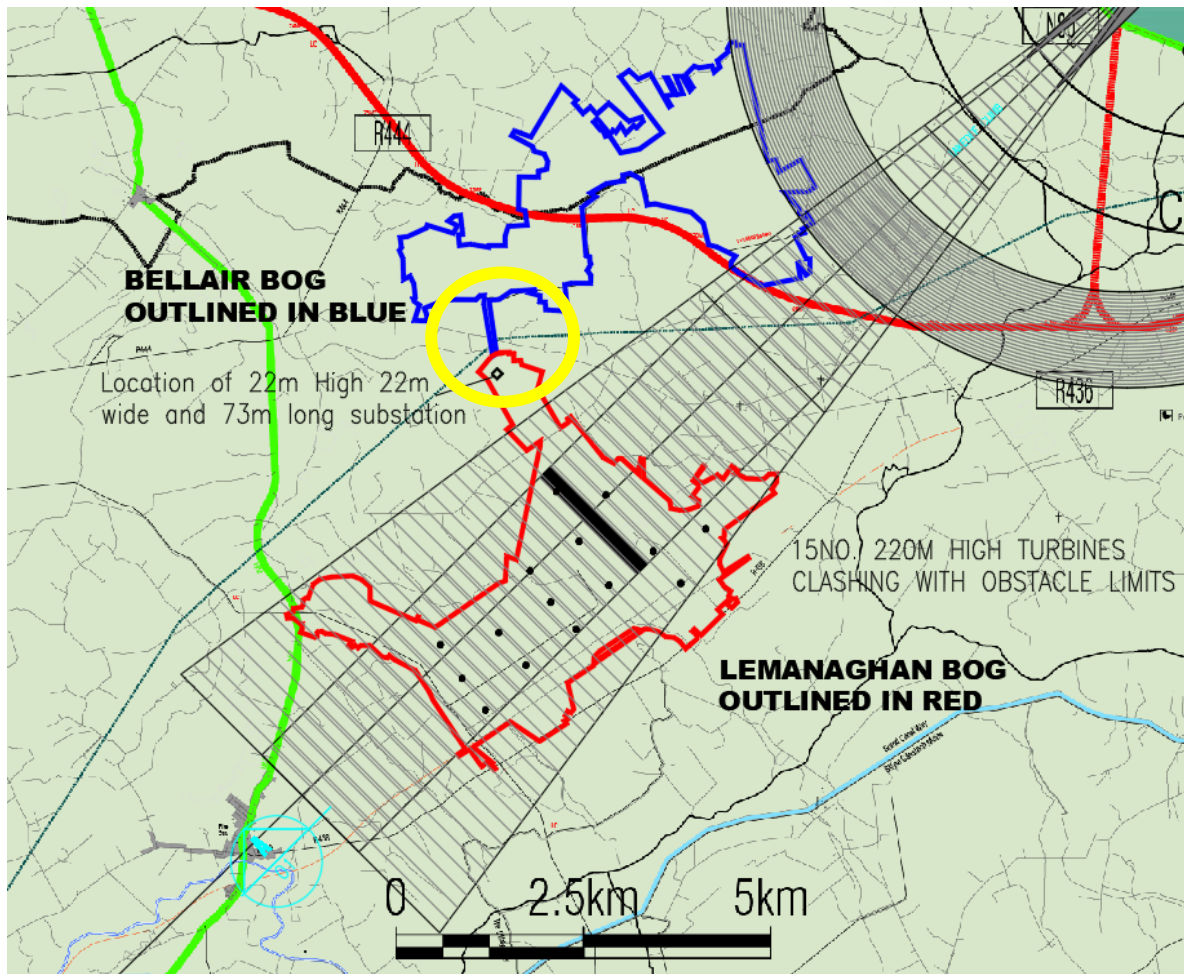
In the absence of a robust aviation safeguarding assessment, the Board cannot be satisfied that the proposed development would not materially conflict with the proper planning and sustainable development of the area.

## • **2. Project Splitting / Inadequate Cumulative Assessment**

A significant concern also arises regarding potential project splitting in relation to the proposed Bellair Wind Farm development.

The Planning Report explicitly identifies Bellair Wind Farm as a related wind energy development within close proximity to the site, noting that Bellair Wind Farm is located approximately 2.7km north of the nearest proposed turbine.

Furthermore, the report confirms that Bellair Bog is one of a number of Bord na Móna / SSE joint venture bogs being progressed for wind energy development as part of a broader coordinated strategy. It is important to note that the two sites have been strategically linked via a narrow strip of land (highlighted in the yellow circle in the map below) adjacent to the proposed substation location. The proposed substation appears very large for a 15 turbine development. This leads us to believe that this project has been designed as a larger development but the impacts are not being fully considered within the EIAR. This in our opinion constitutes project splitting and is a direct contravention of the EIA Directive.



The documentation also demonstrates that the proposed Lemanaghan development has been specifically designed around strategic grid infrastructure and future renewable energy expansion in the region, including:

- the proposed 220kV onsite substation;
- the loop-in connection to the Shannonbridge-Maynooth 220kV line; and
- the broader renewable energy strategy for Bord na Móna peatlands.

Despite these clear interrelationships, the EIAR fails to assess the combined environmental impacts of the Lemanaghan and Bellair projects as a single coordinated renewable energy scheme.

This raises serious concerns under the EIA Directive regarding unlawful project splitting, whereby a larger coordinated project is artificially divided into separate planning applications to avoid assessment of the full cumulative environmental effects.

The cumulative impacts that appear inadequately assessed include:

- combined landscape and visual impacts;
- cumulative aviation and radar impacts;
- ecological and ornithological impacts;
- hydrological impacts across interconnected peatlands;
- cumulative grid infrastructure impacts;

- cumulative traffic and construction impacts; and
- the overall industrialisation of the Midlands peatland landscape.

The Court of Justice of the European Union has consistently held that project splitting is contrary to the objectives of the EIA Directive where connected projects are functionally interdependent and form part of a wider coordinated scheme.

In this instance:

- the projects involve the same strategic developers;
- are located in close geographic proximity;
- are associated with the same peatland transition strategy;
- rely upon coordinated transmission infrastructure; and
- form part of a broader renewable energy rollout across Bord na Móna lands.

Accordingly, the Board should require:

1. A full cumulative assessment of the Lemanaghan and Bellair projects as an integrated development strategy;
2. A detailed assessment of impacts on Midlands Airport safeguarded airspace;
3. Further information regarding coordinated grid and infrastructure planning across the Midlands peatlands; and
4. Clarification as to whether the proposed development constitutes impermissible project splitting under the EIA Directive.

In the absence of such information, the Board cannot be satisfied that the environmental effects of the proposed development have been fully identified, assessed and evaluated in accordance with the requirements of the Planning and Development Acts and the EIA Directive.

Accordingly, permission should be refused unless these significant deficiencies are adequately addressed.

## Conclusion

It is our opinion that the proposed development of 15no. Turbines at 220m high on the Lemanaghan Bog would seriously injure the Midlands regions ability to achieve balanced regional development. This means that the region as a NUTS III region within the EU must be allowed to make the most of its geographical advantages without impediment as enshrined within the Lisbon Treaty.

The proposed development is in direct conflict with the obstacle free zones of the Midlands Airport Proposal. This location has been identified as the best location and supported by an approval as Strategic Infrastructure Development.

The economic impact of the Airport far outweighs that of the windfarm and as such should be protected for the people of Offaly.

We respectfully request that An Coimisiún Pleanála refuses permission for this development on the two grounds

1. That the proposed development would seriously injure the regions potential to accommodate a new international airport
2. The proposed development represents project splitting as is not consistent with the EIA Directive.

Thanks you for your time and consideration of this proposal. Should you require any additional supporting material please do not hesitate to contact us directly

Yours sincerely



Patrick Little  
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CEO  
Midlands Airport Developments Ltd