

To: An Coimisiún Pleanála

Planning Reference: 324161 - An Coimisiún Pleanála - Case reference: PAX19.324161

Re: Proposed development of 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure

Date: 25-May-2026

On behalf of: Pamela & Andre McQuaid

Introduction

I wish to lodge a formal objection to the Proposed development of 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure.

I wish to make the following objections against the proposed development for the following reasons outlined below:

1.0 Water Courses

These watercourses flow through agricultural lands and are used directly as drinking water sources for livestock before discharging into the Shannon–Brosna catchment. Any degradation at source will have immediate and cumulative downstream impacts.

- hydrological integrity
- water quality
- peatland stability
- risks to agriculture and animal welfare including livestock, the Hen harrier and Badgers
- non-compliance with Irish and European environmental law

Lemanaghan Bog functions as the potential hydrological source and water shed of several water bodies, including:

- River Boor (020)
- Brosna (100)
- Brosna (110)
- Lemanaghan Stream (010)

Non-Compliance with the EU Water Framework Directive (2000/60/EC) and the Derrybrien Precedent

Under the Water Framework Directive (WFD), Ireland is legally obliged to:

- **Prevent deterioration** in the status of all surface waters
- **Protect, enhance, and restore** water quality

The proposed development presents a clear and unacceptable risk of:

- **Increased sedimentation** due to upland peat disturbance
- **Contamination from construction materials** (including alkaline cement, fuels, and oils)
- **Disruption of natural hydrological pathways** across sensitive peatlands
- **Elevated levels of dissolved organic carbon** entering downstream watercourses

As the affected rivers originate within the development footprint, any deterioration would represent a direct breach of Article 4 of the WFD, which strictly prohibits the degradation of water body status. The catastrophic, real-world reality of these technical risks is definitively established in Irish planning history by the **Derrybrien Wind Farm case (An Bord Pleanála Case 308019)**. The state's own remedial

environmental records prove that upland wind farm construction on peatland can trigger massive terrain instability, causing severe long-distance sedimentation that decimated aquatic life and heavily contaminated downstream agricultural water systems. Because the downstream rivers in this instance serve as the primary, irreplaceable drinking source for local livestock, any replication of the Derrybrien pollution event would severely threaten animal welfare, cause toxic chemical or sediment ingestion, and breach the Animal Health and Welfare Act 2013.

Critically, in line with the high evidentiary standards demanded in *Roache v An Bord Pleanála*, the applicant has failed to demonstrate—with the required level of absolute scientific certainty—that the hydrological and ecological integrity of these vital agricultural waters can be safeguarded. In the presence of such profound scientific doubt, and given the strict, non-negotiable non-deterioration mandate of Article 4 of the WFD, An Bord Pleanála is legally bound to apply the precautionary principle and refuse planning permission.

Watercourses originating in Lemanaghan Bog supply untreated drinking water to livestock across extensive farmland.

The proposed development introduces significant contamination risks, including:

- increased turbidity
- hydrocarbon pollution
- cementitious runoff
- elevated organic loading from disturbed peat

Such impacts may result in breaches of:

- Animal Health and Welfare Act 2013
- Food safety and traceability standards

No robust or credible mitigation strategy has been provided to ensure protection of agricultural water quality.

The Precautionary Principle

Under EU law, where there is:

- scientific uncertainty
- risk of serious or irreversible environmental harm

the **precautionary principle** must apply.

Given:

- the hydrological sensitivity of the site
- the presence of multiple river sources within the development area
- the direct dependency of downstream agriculture and ecosystems

the burden of proof rests with the developer to demonstrate absence of harm.

This burden has not been met.

Planning and Development Act 2000 (as amended)

Under Section 34(3), planning authorities are required to ensure that development does not:

- cause environmental pollution
- endanger public health
- contravene EU law

The risk of contamination of watercourses used for livestock drinking water raises clear concerns regarding:

- public and animal health
- agricultural sustainability

Additionally, the Act requires proper consideration of **cumulative impacts**. The Shannon and Brosna catchments are already under environmental pressure. The introduction of a large-scale industrial

development at their hydrological source is inconsistent with sustainable planning and environmental protection principles.

Environmental Impact Assessment Directive (2014/52/EU) Deficiencies in the EIAR

Developments on peatlands require particularly rigorous assessment. The Environmental Impact Assessment Report (EIAR) submitted is materially deficient and fails to adequately address:

- peat stability risks, including the potential for peat slippage
- hydrological connectivity between the bog and downstream systems
- impacts on agricultural water supplies
- cumulative impacts on the wider Shannon–Brosna catchment
- worst-case scenario analysis, as required under established EU case law (including *People Over Wind* and *Sweetman*)

The EIAR does not meet the legal standard of “**complete, precise and definitive findings**” as required by the Court of Justice of the European Union.

1.4 Peatland Protection and National Climate Policy

The proposed development conflicts directly with national policy, including:

- the National Peatlands Strategy (2015)
- Ireland’s Climate Action Plan

These policies recognise peatlands as critical assets due to their:

- carbon storage capacity
- hydrological sensitivity
- ecological and biodiversity value

Construction activities—including excavation, road building, and turbine foundations—will result in irreversible damage to peat structure, undermining both climate and environmental objectives.

2.0 Animal habitats

2.1 Hen Harriers

While the environmental Impact Assessment report appears to confirm sightings of Hen Harrier, observations only appear to have been made during the period September to March.

Hen Harrier Roosting season is generally between the months July to March. We would therefore have to question how a full assessment of Hen Harrier during its roosting season could be carried out, when an assessment of the full roosting season does not appear to be being conducted.

Secondly, we would have question if the presence of Hen Harrier in the area of the proposed windfarm, would in fact indicate the presence of an established hen harrier roosting site close to the intended site.

We would therefore conclude on this point that the proposer has failed to conduct a comprehensive assessment of hen harrier roosting sites in the vicinity.

2.2 Badgers

The principal legislation protecting badgers in Ireland is the [Wildlife Act, 1976](#), alongside its subsequent major update, the [Wildlife \(Amendment\) Act, 2000](#). Together, these pieces of legislation are collectively known as the **Wildlife Acts**.

According to the Department of Agriculture mapping of badger setts there are 27 badger setts

situated within 500m of Lemanaghan bog and the proposed wind farm. Large scale infrastructure development and disturbance of habitat have a detrimental effect on badger health and disease levels.

However, according to the Non-Technical Summary of the planning application page 18 only 1 badger sett has been identified. This would suggest that **the applicant's ecological assessment is fundamentally flawed, deficient, and based on inadequate field surveys.**

A single identified sett across a large-scale industrial wind farm footprint contradicts established badger biology and territory sizes. This major undercount strongly indicates that the developer has failed to conduct comprehensive, season-aligned ecological surveys, thereby underreporting the true presence of a protected species to circumvent strict statutory protections under the Wildlife Acts.

Key Concerns

Physiological Stress

Research indicates that badgers living close to operational wind farms (within 1k) of a wind farm exhibit a 264% higher cortisol level than those living more than 10km away, indicating physiological stress. This stress is attributed to the turbines sound which affect the badgers immune system's, leading to increased risk of infection and disease (TB).

Habitat loss & Fragmentation: Clearing trees and undergrowth, laying underground cables, and building access roads can disrupt established badger territories, foraging grounds, and commuting routes.

Sett Disturbance: The use of heavy machinery during the construction phase can cause structural damage to underground setts or trigger severe disturbance to breeding badgers.

3.0 Landscape and Visual Impact – Deficiencies in EIAR Assessment

The Environmental Impact Assessment Report (EIAR) contains significant deficiencies in its assessment of landscape and visual impact, particularly in its reliance on “theoretical visibility” and its interpretation of topographical screening.

The EIAR states that certain landforms create “pockets of no theoretical visibility.” However, this reliance on Zone of Theoretical Visibility (ZTV) mapping is insufficient and potentially misleading for the following reasons:

- **Theoretical visibility does not reflect real-world conditions.**
ZTV mapping assumes idealised conditions and does not account for seasonal vegetation loss, atmospheric clarity, or elevated viewpoints (e.g. upper floors of dwellings, roadways, or heritage sites). As such, actual visibility is likely to be significantly greater than presented.
- **Underestimation of long-distance and cumulative visibility.**
Given the exceptional scale of the proposed turbines (up to approximately 220m), visibility is likely to extend well beyond the 10km study area referenced. The EIAR fails to adequately assess long-distance views or the cumulative visual impact in the wider landscape.
- **Overreliance on minor topographical screening.**
The EIAR places undue emphasis on relatively modest landforms (e.g. Endrim, Cor, and Bellair Hills) as effective screening features. Given the height of the proposed turbines, such features cannot reasonably be considered sufficient to mitigate visual intrusion, particularly where turbines will project above the skyline.
- **Failure to assess worst-case visibility scenarios.**
There is no clear evidence that the EIAR has assessed visibility under worst-case conditions,

including winter (leaf-off) scenarios and clear atmospheric conditions, when visibility would be at its greatest.

- **Inadequate consideration of sensitive receptors.**

The EIAR refers generally to “receptors” but does not adequately demonstrate how visibility from sensitive locations—such as residential properties, heritage landscapes, and amenity routes—has been assessed. This is particularly concerning given the recognised cultural and archaeological significance of the Lemanaghan area.

- **Landscape character impacts not addressed.**

The existence of “pockets of no visibility” does not mitigate the overall impact on landscape character. The proposed turbines represent large-scale industrial structures that will dominate the skyline and alter the character of the receiving environment.

- **Omission of night-time visual impact.**

The EIAR does not adequately assess the impact of aviation lighting, which can significantly extend visibility at night and introduce persistent visual intrusion over a wide area.

- **Use of minimising and subjective language.**

Terms such as “minor topographical elevations” and “only notable features” suggest a downplaying of landscape sensitivity and may indicate bias in the assessment.

Protected Structures within the amenity of the proposed windfarm.

It is noted that the **Offaly County Council** Development Plan (including previous plan reference O16-01) sets out a clear objective:

“To preserve and enhance the character of the County’s landscape where, and to the extent that, in the opinion of the Council, the proper planning and sustainable development of the area require it.”

This objective reflects the statutory obligations of the planning authority under the **Planning and Development Act 2000**, which requires that all development be assessed in the context of the proper planning and sustainable development of the area.

In this context, Bellair Hill represents a prominent elevated landform within an otherwise relatively flat surrounding landscape. Due to this topographical prominence, the area is particularly sensitive to large-scale vertical development. The introduction of turbines of the scale proposed would result in significant skyline intrusion and visual dominance, fundamentally altering the character of the landscape.

Furthermore, Bellair House is a protected structure (Ref: 11-07) and is also located within a designed landscape recorded in the **National Inventory of Architectural Heritage** (Inventory of Historic Gardens and Designed Landscapes, Ref: OF-48N-186318). As such, it benefits from statutory protection under Part IV of the Planning and Development Act 2000.

In addition, the trees and wider demesne at Bellair are afforded specific protection under Section 15.12 of the Offaly County Development Plan. These protections recognise the architectural, historical, and landscape significance of the site as a unified heritage asset.

The proposed wind farm would introduce large-scale industrial structures into the setting of this protected structure and designed landscape, resulting in significant adverse impacts on its character, setting, and visual integrity. Such impacts would materially diminish the heritage value of Bellair House and its associated landscape.

Under Section 34(2) of the Planning and Development Act 2000, the planning authority is required to have regard to the protection of architectural heritage and the preservation of the character of protected structures and their settings. The proposed development fails to demonstrate how these statutory protections would be upheld.

It is further submitted that the Environmental Impact Assessment Report (EIAR) is deficient in that it fails to adequately assess these impacts, including the effects on the setting of protected structures and designed landscapes, as required under the **EIA Directive 2014/52/EU**.

In light of the above, the proposed development would:

- conflict with the landscape protection objectives of the Offaly County Development Plan
- adversely impact a protected structure and its setting
- undermine the integrity of a nationally recognised designed landscape
- fail to comply with statutory obligations under Irish and EU planning law

Accordingly, the proposed development is contrary to the proper planning and sustainable development of the area.

It is noted that the **Offaly County Council** Development Plan, including previous Development Plan reference O16-01, contains a clear objective:

“To preserve and enhance the character of the County’s landscape where, and to the extent that, in the opinion of the Council, the proper planning and sustainable development of the area require it.”

The proposed wind farm would introduce substantial industrial infrastructure into the immediate setting of this protected structure and designed landscape, fundamentally altering its visual integrity and historic character. Such impacts would materially diminish the heritage value of Bellair House and its associated landscape and would therefore be contrary to the proper planning and sustainable development of the area.

The Irish courts have repeatedly confirmed that the protection of environmental and landscape interests requires a rigorous and legally compliant assessment process.

In **Sweetman v An Bord Pleanála**, the Court of Justice of the European Union confirmed that where there is reasonable scientific doubt regarding environmental impacts, consent cannot lawfully be granted. The Court emphasised that competent authorities must be certain that no lasting adverse effects on protected interests will arise before granting permission.

Similarly, in **People Over Wind and Sweetman v Coillte**, the Court reaffirmed that mitigation measures cannot be relied upon at screening stage to exclude the possibility of significant effects and stressed the requirement for complete, precise, and definitive findings capable of removing all reasonable scientific doubt.

In **O’Grianna & Others v An Bord Pleanála**, the Irish High Court held that environmental assessment must consider the entirety of a project and its associated impacts rather than artificially limiting the scope of assessment. This principle is particularly relevant where the EIAR appears to minimise cumulative landscape and visual impacts through reliance on selective theoretical visibility analysis.

Furthermore, in **Kelly v An Bord Pleanála**, the courts recognised the importance of adequately assessing impacts on landscape character and visual amenity as integral components of lawful planning assessment.

It is submitted that the Environmental Impact Assessment Report (EIAR) accompanying the proposed development fails to satisfy these legal standards. In particular, the EIAR:

- relies excessively on “theoretical visibility” mapping rather than real-world visual assessment
- underestimates the visual impact of turbines of this scale on an elevated and visually sensitive landscape
- fails to adequately assess cumulative and long-distance visibility impacts
- does not properly evaluate impacts on the setting of Bellair House and the associated designed landscape

- fails to provide complete, precise, and definitive findings sufficient to remove reasonable scientific doubt regarding the extent of landscape and heritage impacts

The proposed development therefore conflicts with:

- the Offaly County Development Plan
- statutory protections for architectural heritage and protected structures
- obligations under the Planning and Development Act 2000
- principles established under Irish and EU environmental jurisprudence

Accordingly, the proposed development would be contrary to the proper planning and sustainable development of the area and should be refused.

4.0 Cumulative negative effects on County Offaly

County Offaly is already experiencing significant cumulative negative impacts from over 200 existing wind turbines, **and that the addition of this large-scale development would** exacerbate an already unsustainable concentration of wind energy infrastructure.

This objection is based on the cumulative effects on **population and human health, landscape, peatlands, hydrology, roads and traffic, and social equity**, all of which are required to be assessed under the EIA Directive and EPA Guidelines (2022). These cumulative impacts have **not been adequately assessed** in the EIAR.

4.1 Cumulative Noise, Health and Amenity Impacts

Offaly already hosts one of the highest densities of wind turbines in Ireland. Communities in north and west Offaly have been exposed to **layered turbine noise** from multiple operational wind farms for over a decade.

The cumulative effects include:

- Chronic sleep disturbance – as referenced in the case by *Margaret Webster & Keith Rollo & Ross Shorten & Joan Carty v. Meenacloghspar (Wind) Limited (2024–2025)*
- Persistent low-frequency noise exposure – as referenced by *Byrne & Anor v ABO Energy Ireland Limited & Ors (2025)*
- Stress, annoyance, and reduced quality of life as per *Webster v Meenacloghspar (Wind) Limited [2024] IEHC 136*.
- Loss of quiet rural amenity. A quiet rural landscape deserves specific legal protection against industrial encroachment is *Byrne & Anor v ABO Energy Ireland Limited & Ors [2025]*, building directly upon the foundational principles of *Webster v Meenacloghspar (Wind) Limited [2024]*

The EIAR treats noise impacts **in isolation**, ignoring the reality that residents are already surrounded by turbines in multiple directions. The addition of 15 more turbines at Lemanaghan would **intensify cumulative noise exposure**, contrary to the requirement to protect human health.

4.2 Cumulative Landscape and Visual Saturation

Offaly's bog landscapes have undergone a **dramatic industrialisation** due to wind energy development. With over 200 turbines already constructed, many communities now experience:

- Turbines visible from multiple directions
- Loss of open horizon and dark-sky character
- Visual dominance of industrial structures in formerly quiet boglands

The Lemanaghan proposal would extend this industrialisation into one of the **last remaining intact bog landscapes** in the county. The EIAR fails to acknowledge that Offaly is already **visually saturated**, and that further development would cause disproportionate cumulative harm.

4.3 Cumulative Peatland Loss, Carbon Emissions and Habitat Fragmentation

Offaly's wind farms are overwhelmingly located on **peat soils**, including cutaway and active bogs. Each project involves:

- Peat excavation
- Drainage
- Road construction
- Hydrological alteration

Individually, these impacts may be assessed as “manageable”, but cumulatively they represent:

- Large-scale peat oxidation and carbon emissions
- Permanent loss of peatland habitat
- Fragmentation of remaining bog ecosystems
- Increased vulnerability to peat instability

The Lemanaghan site is a **deep peat landscape** with known archaeological and ecological sensitivity. Adding another major peat-disturbing project to an already heavily impacted county is **not environmentally sustainable**.

4.4 Cumulative Hydrological and Flood-Risk Impacts

Wind farms across Offaly have introduced:

- New drainage networks
- Hardstanding areas
- Cable trenches
- Altered water pathways

Cumulatively, these changes:

- Increase runoff
- Reduce natural water storage capacity
- Alter bog hydrology
- Increase uncertainty around local flooding

The EIAR does not assess how the Lemanaghan project interacts with **existing hydrological alterations** from other wind farms in the county. This is a **serious omission**.

4.5 Cumulative Traffic, Road Damage and Construction Burden

Communities in Offaly have endured repeated cycles of:

- HGV traffic
- Abnormal turbine loads
- Road widening
- Road deterioration
- Construction noise and dust

Local councillors have already stated that north Offaly is “**saturated**” with energy projects and that the road network is “**among the worst in the country**”.

Adding another major construction project would impose **further cumulative strain** on already overburdened rural roads.

4.6 Social Equity and Disproportionate Burden on Offaly

Offaly has become a **national energy sacrifice zone**, hosting:

- Wind farms
- Solar farms
- Battery storage
- Biomass plants

- Grid infrastructure

Meanwhile, other counties host far fewer energy projects.

This raises legitimate concerns about:

- Fairness
- Social licence
- Community wellbeing
- Planning balance

The cumulative burden on Offaly is **disproportionate**, and the Lemanaghan proposal would worsen this imbalance.

4.7 Failure of the EIAR to Assess Cumulative Impacts

The EIAR for Lemanaghan repeatedly concludes “Not Significant” without:

- County-wide cumulative modelling
- Cross-project hydrological assessment
- Landscape saturation analysis
- Cumulative noise mapping
- Assessment of cumulative peat disturbance
- Consideration of community fatigue or social equity

This is **not compliant** with the EIA Directive, which requires cumulative impacts to be assessed **explicitly and transparently**.

Conclusion

County Offaly has already absorbed more than its fair share of wind energy development. The cumulative negative effects on landscape, peatlands, hydrology, health, roads, and community wellbeing are **significant, ongoing, and unaddressed**.

The Lemanaghan Wind Farm would **exacerbate these cumulative impacts** and further industrialise a county that is already saturated with turbines.

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

For these reasons, and in the interests of protecting the wellbeing of my family, my home, and my community, I respectfully ask An Coimisiún Pleanála to refuse permission for the proposed Lemanaghan Wind Farm.

5.0 Failure to capture the importance of local Heritage

The Rich Heritage Around Lemanaghan Cemetery

Both Clonmacnoise and Lemanaghan represent exceptionally sensitive, interconnected early medieval monastic landscapes in County Offaly.

The proposed windfarm will cause irreversible harm to the integrity, landscape value, and archaeological preservation of two interconnected early medieval monastic landscapes of international and national importance: **Clonmacnoise** and **Lemanaghan**. However, according to the Non-Technical Summary of the planning application Clonmacnoise is left out.

The unique cultural, spiritual, and historical significance of this specific midland corridor mandates a refusal of permission on the following specific planning grounds.

Lemanaghan Bog and Graveyard is not just a local cemetery; it is an archeological landscape of **international and European significance**, boasting an extraordinary concentration of early Christian artifacts.

Core Heritage Assets to Highlight in an Objection:

- **The Monastic Foundation:** Founded in 645 AD by **Saint Manchán**, the site includes a highly revered early medieval church ruin, an active graveyard, two ancient bullaun stones, and a rare collection of over a dozen early Christian grave slabs.
- **The "Togher" (Stone Pilgrim Path):** A unique, fully intact ancient stone trackway (*togher*) cuts directly through the surrounding peat bog, linking the main monastery to **St. Mella's Cell** (the saint's mother) and a preserved holy well.
- **Recent Discoveries of Human Remains:** Recent environmental weathering and scientific tracking uncovered older, sub-surface medieval remains. Carbon dating confirmed these individuals were laid to rest between **662 AD and 939 AD**, proving that the surrounding bogland is effectively a widespread, unexcavated early Christian cemetery network.
- **The Shrine of St. Manchán:** The site is directly linked to the world-famous 12th-century **Shrine of St. Manchán**. This masterwork of Romanesque bronze and yew wood was created at Clonmacnoise specifically to house his relics, permanently bonding the heritage of Lemanaghan and Clonmacnoise together.

Crucial Grounds for Refusal

- **Breach of the Zone of Theoretical Visibility (ZTV):** Given that modern wind turbines feature tip heights exceeding 150m–180m, their rotating blades will aggressively breach the flat, open horizon of the River Shannon basin. When viewed from the elevated viewpoints within Clonmacnoise—specifically its round towers and historical churches—these industrial structures will permanently fracture the pristine, "pure" landscape setting that has drawn pilgrims for over a millennium.
- **Risk to Unexcavated Human Remains:** As established by recent environmental weathering and carbon dating, the peatlands surrounding Lemanaghan cemetery contain unexcavated human remains dating securely between **662 AD and 939 AD**. The surrounding bog is effectively an expanded, sub-surface early medieval burial ground. Subjecting this sensitive peatland matrix to intense industrial piling, foundation pouring, and heavy goods vehicle (HGV) traffic risks the permanent, illegal destruction of unrecorded national monuments and human graves.
- **The Clonmacnoise Link (The Shrine of St. Manchán):** The heritage of Lemanaghan and Clonmacnoise is fundamentally inseparable. The world-famous 12th-century *Shrine of St. Manchán* was crafted at Clonmacnoise specifically to house the relics of Lemanaghan. To insert a massive grid of industrial wind turbines between these two historically unified monastic sites is an affront to the cohesive archaeological integrity of County Offaly.
- **Impact on the Ancient Pilgrim Path and Cultural Network:** Clonmacnoise does not exist in isolation. It is the anchor point of a vast, interconnected network of early Christian routes, including the ancient *Slighe Mhór*. Placing massive industrial infrastructure within this visual envelope degrades the wider cultural landscape corridor, violating the heritage preservation objectives of the *Offaly County Development Plan*.
- **Precedent of Severe Landscape Impact:** In parallel visual cases, such as the landmark *Gougane Barra Valley High Court Judicial Review*, the courts and the Board established that wide-scale public policy supporting renewable energy **does not outweigh** a development that unacceptably degrades or visually obtrudes upon a designated landscape of national or international importance.
- **Violation of Planning Precedent (The Maighne Precedent):** In *An Bord Pleanála Case ABP-PA0041 (The Maighne Wind Farm)*, the Board explicitly established that renewable projects must be refused if they dominate or visually clutter views from designated heritage assets across a wide catchment area. The scale of these turbines treats the wider Shannon catchment as a utility zone rather than a protected cultural corridor.
- **Environmental Harm to the Shannon Callows:** Wind farm construction on adjacent peatlands requires thousands of heavy goods vehicle (HGV) movements and massive soil extraction. This creates high risks of siltation and run-off polluting the **Shannon Callows Special Area of Conservation (SAC)**, which wraps around Clonmacnoise

1. Visual Intrusion and Degradation of the Setting of Clonmacnoise Monastic Site

The proposed development, despite sitting approximately 13.5 kilometres from the Clonmacnoise monastic cemetery, will cause an unacceptable visual intrusion upon this premier heritage asset.

Irreversible Archaeological Destructiveness within the Lemanaghan Complex

The proposed development poses an immediate, existential threat to the **Lemanaghan Monastic Complex and Cemetery Landscape**. This area is an unexcavated, internationally significant archaeological sanctuary, not a standard brownfield site.

- **Physical Interruption of the Early Christian Landscape:** Founded by Saint Manchán in 645 AD, Lemanaghan comprises a dense concentration of early Christian grave slabs, bullaun stones, and church ruins. Crucially, the surrounding bogland acts as an intact preservation matrix for the ancient **Stone Togher Path** (pilgrim trackway) connecting the main monastery to St. Mella's Cell. Heavy excavation, piling, and road-laying will physically disrupt and sever these ancient, sacred connections.
- **Risk to Unexcavated Human Remains:** As established by recent environmental weathering and carbon dating, the peatlands surrounding Lemanaghan cemetery contain unexcavated human remains dating securely between **662 AD and 939 AD**. The surrounding bog is effectively an expanded, sub-surface early medieval burial ground. Subjecting this sensitive peatland matrix to intense industrial piling, foundation pouring, and heavy goods vehicle (HGV) traffic risks the permanent, illegal destruction of unrecorded national monuments and human graves.
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Light Pollution in a Pristine Landscape: The mandatory installation of high- Cumulative Industrialization of Quiet Peatlands and Dark Sky Destruction

- **Loss of Open Horizons:** The flat, low-lying, open topography of the local boglands lacks the natural vegetation or terrain required to screen structures of this scale. The turbines will achieve a state of total visual dominance, permanently changing the area's classification from a quiet rural amenity to a heavy utility zone.
- intensity, flashing red aviation warning lights on top of the turbine hubs will introduce severe night-time light pollution. This will permanently destroy the "Dark Sky" character and natural nocturnal peace of both the Lemanaghan and Clonmacnoise environments.

Conclusion and Request for Refusal

As established by the Irish courts—most notably in the landmark **Gougane Barra Valley High Court Judicial Review**—the public interest in developing renewable energy **does not override** the state's duty to protect landscapes of exceptional national and international heritage value.

The proposed development represents an incompatible, highly destructive industrial intrusion into an interconnected medieval landscape. It threatens unexcavated early Christian archaeology at Lemanaghan and permanently compromises the visual purity of Clonmacnoise.

The idyllic village of Ballinahown, Co. Westmeath, is located less than 8 kms from the proposed site. This village has been omitted by the current planning application. This Village has achieved **extraordinary national and international recognition**.

National Tidy Towns Triumphs

Ballinahown is one of the most prolific contenders in the history of the SuperValu Tidy Towns competition, culminating in historic victories:

- **Ireland's Tidiest Village (2024):** The village reached its ultimate national milestone by being officially crowned Ireland's Tidiest Village at Croke Park, defeating over 900 competing communities across the country.
- **Regional and County Winner:** The village secured the **Midlands & East Regional Award** and has repeatedly claimed the title of **Westmeath County Winner**.
- **Gold Medal Status:** It achieved and retained the highly coveted Tidy Towns **Gold Medal standard**.
- **Water & Communities Award:** The village was **Highly Commended** for its independent, proactive local water protection and conservation efforts.

European and Community Awards

Beyond domestic success, Ballinahown has proven its sustainable framework on an international level:

- **Entente Florale Europe Gold Medal (2024):** Nominated to represent Ireland, Ballinahown won a prestigious Gold Medal at the Entente Florale in Szekesfehervár, Hungary. It made history as the **smallest Irish village ever** to enter the competition.
- **Special Characteristic Prize:** The international Entente Florale jury awarded Ballinahown a special prize specifically recognizing the exceptional **energy, enthusiasm, and involvement** of the local community.
- **Westmeath Independent Sports and Community Awards:** The village development network captured the **Club of the Year** title and took home the **Overall Community Award**.
- **Westmeath Cathaoirleach Awards:** Honored by Westmeath County Council as the **Overall Winner** of the Westmeath Tidy Towns Awards. [[1](#), [2](#), [4](#)]

Key Project Achievements

Judges frequently praise Ballinahown for its "bottom-up" approach to environmental engineering. Key projects that secured these awards include: [[1](#)]

- A newly developed **village wildlife and biodiversity park**.
- An extensive local **Biodiversity Action Plan** and native hedgerow restoration.
- The construction of a **new village walkway** integrated with traditional Irish architecture and green spaces.

Devaluation of the Historic Pilgrimage Corridors: The development directly encroaches upon the ancient monastic heritage landscape that structurally connects Lemanaghan to Clonmacnoise and Ballinahown via the Pilgrims' Road. This industrial installation irreversibly degrades the visual and spiritual character of this linked tourism amenity.

Detriment to National and European Ecological Investments: The village of Ballinahown is the reigning title holder of 'Ireland's Tidiest Village' (2024) and the European Entente Florale Gold Medal, awarded largely for its community biodiversity and conservation networks [ballinahownvillage.com]. Large-scale industrial peatland modification within an 8km **radius poses severe, unmitigated threats to the shared regional water tables, bird flight paths, and wildlife corridors**.

Ballinahown, Lemanaghan, and Clonmacnoise are explicitly bound by the historic **Pilgrims' Way / Clonmacnoise Cycle Route Network**. Installing 220-metre-tall industrial structures directly inside this medieval corridor creates irreversible visual and spatial degradation. It fragments the historic context that local communities have worked to preserve. **It introduces major visual dominance, ruining the rural, untouched landscape value of the wider community.**

6.0 Project Splitting

In August 2023, the proposed developer registered a company called 'Bellair Wind Farm' and in May 2025 the proposed developer of Lemanaghan Wind Farm officially announced the proposal to develop a wind farm on Bellair Bog, which lies approximately 2 kilometres to the north, and adjacent to Bellair Bog.

The intended substation planned for Lemanaghan Bog is approximately 1.5 Kilometres from Bellair bog.

The proposed developer of Lemanaghan Wind Farm does not appear to have addressed this in the Environmental Impact Assessment Report, the future cumulative effects, of this project or their future plans in relation to the overall plan for the infrastructure for either or both Windfarms.

This in our view, amounts to 'Project Splitting'.

The Core Rule of Project Splitting

A project must be evaluated as a whole. Segmenting projects to solely avoid triggering EIA requirements or local council thresholds violates planning. (The Office of the Planning Regulator).

Core Irish Planning Precedents to Cite

- Grid Connection as an Integral Whole (*Ó Grianna v. An Bord Pleanála [2014] IEHC 632*): The High Court ruled that a wind farm and its grid connection are a single integrated project. They cannot be evaluated in isolation. If the grid route is ambiguous or deferred, the entire environmental assessment is legally flawed.
- Prohibition of "Project Splitting" (*Daly v. Kilronan Windfarm Ltd [2015] IEHC 390*): Confirmed that developers cannot isolate ancillary infrastructure (like a substation or its grid corridor) to bypass strict Environmental Impact Assessments (EIA).
- The Derrybrien Precedent: The catastrophic peat landslide at Derrybrien Wind Farm established strict planning expectations regarding structural risks in deep peat. Siting heavy infrastructure on deep blanket or deep cutaway peat without absolute field validation is viewed by planning boards as an unacceptable risk to local habitats and watercourses.

Point 1: Fundamental Project Splitting and Inadequate EIA of Grid Connection

"We object to the Proposed Project on the grounds of unlawful 'Project Splitting,' which violates the EU EIA Directive and established Irish case law. In *Ó Grianna v. An Bord Pleanála [2014] IEHC 632*, the High Court established that a wind farm and its grid connection form a single integrated project for the purposes of Environmental Impact Assessment.

Chapter 4 of the EIAR fails to properly detail, map, or environmentally assess the 0.4km grid corridor linking the proposed 220kV substation in Cooldorragh to the existing Shannonbridge-Maynooth 220kV Overhead Line (OHL). By describing this crucial 0.4km connection as an ancillary matter dependent on 'preliminary assessments' by the TLI Group, the applicant is attempting to defer the complete environmental analysis of the grid connection. Leaving this corridor vague prevents the public and the

Planning Authority from assessing cumulative environmental impacts, rendering the EIAR legally deficient under the *Ó Grianna* precedent."

Point 2: Structural Unfeasibility and Extreme Geotechnical Risk (Peat Failures)

"The decision to site the massive 220kV onsite substation on the deepest peat layer found anywhere across the development site (5.0m to 5.5m depth) creates an unacceptable geotechnical risk. The applicant's Non-Technical Summary explicitly states: *'Where possible the deeper peat areas have been avoided by the Proposed Project layout.'* Yet, contradicting this mitigation principle, the heaviest single component of critical electrical infrastructure is positioned on the maximum peat depth recorded.

Siting a heavy substation compound, including 4 steel masts, 2 gantry structures, and crane pads, on 5.5m of unstable peat presents a severe threat of shear failure, bog bursts, and peat slides. The applicant has failed to provide a site-specific foundation engineering design or show how structural integrity can be safely achieved without triggering localized peat failure. This lack of concrete technical design creates a direct threat to the safety of the surrounding environment."

Point 3: Deficient Site Selection Methodology

"The alternative site selection process for the substation infrastructure is legally and technically flawed. The applicant notes that the TLI Group utilized a basic *'desktop analysis'* to determine three potential substation locations.

Relying on macro-level desktop data rather than localized field data for siting highly sensitive infrastructure on a peatland ecosystem is a major oversight. The fact that the chosen location coincides with the deepest, most vulnerable peat deposits (5-5.5m) proves that the desktop appraisal model failed to properly identify engineering constraints. The Planning Authority should request further information requiring the applicant to publish full field data and engineering parameters for the other two rejected alternative locations, which likely offered superior geological stability."

Point 4: Failure to Quantify Spoil and Sequestered Carbon Releases

"The EIAR fails to calculate or declare the volume of peat and subsoil 'spoil' resulting from the excavation of the 220kV substation. To safely sit a heavy electrical substation on a site underlain by limestone bedrock, massive volumes of deep peat (up to 5.5m deep) must be cleared down to the bedrock layer.

The absence of precise volumetric calculations for this specific excavation zone makes it impossible to evaluate where this unstable, liquefied peat will be stored, how it will be managed, or how its breakdown will be prevented. This creates a risk of catastrophic sediment runoff into local drainage systems. Furthermore, excavating 5.5m of deep peat strips away its carbon-sink status and releases significant amounts of sequestered carbon. This undermines the project's stated objective of lowering greenhouse gas emissions."

Point 5: Hydrological Destabilization and Conduiting Effects

"The concentration of 1.2-meter deep cabling trenches routing all 15 turbines and the met mast into the 220kV substation will cause severe hydrological disruption to the Cooldorragh townland.

Because the substation serves as the central hub for the 17.1km internal road and network system, multiple deep cable trenches will intersect at this single deep-peat area. Cutting multiple 1.2m deep channels directly into a 5.5m deep peat ecosystem will create artificial drainage conduits. This layout will continuously pull water away from the surrounding bog, lowering the localized water table, drying out adjacent peatlands, and causing differential ground subsidence that threatens the long-term structural integrity of the substation foundations."

7.0 Devaluation of Homes in the Area:

I am deeply concerned that the area I live in will be changed from a rural setting within a picturesque and idyllic countryside to an industrial landscape with towering Wind turbines disturbing the peace and tranquillity of the area. Localised property valuation studies show that the "viewshed" disruption—and associated price impacts of 5% to 14%—can extend significantly up to a 2km to 3km radius if the 220m turbines dominate a home's unobstructed panoramic view.

This proposed windfarm represents a severe visual overdevelopment that will result in a significant loss of residential amenity for established properties in the surrounding rural townlands. The exceptional vertical scale of these industrial structures will introduce an overwhelming visual dominance and irreversible viewshed disruption within a 2km to 3km radius, fundamentally fracturing the established rural character, peace, and tranquillity of the low-lying midlands landscape. Because the flat topography of the Lemanaghan Bog basin offers zero natural topographic screening, the industrialisation of this sensitive viewshed creates an unavoidable injury to the visual amenities of the area. This profound change from an idyllic rural landscape to an industrial aesthetic introduces severe, long-term market resistance, altering the material fabric of the local community. Furthermore, the resulting degradation of the residential environment conflicts directly with the landscape protection and rural preservation objectives set out under the Offaly County Development Plan.

We as a family and for the local people of this community truly believe there is nothing to recommend this application. We call on An Coimisiún Pleanála to refuse permission for this application for all the reasons outlined above.

Regards

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