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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 24/05/2026.
Case Reference Number: PAX19.324161
(www.lemanaghanwindfarmplanning.ie)

Dear Sir / Madam,

I wish to make a formal objection to the proposed Lemanaghan Wind Farm in Co. Offaly.

I am objecting because the proposed development would have a serious negative impact on the local residents, the wildlife, heritage and overall character of Lemanaghan. My fiancé's family home lies approximately 500 meters away from Lemanaghan Bog where this wind farm has been proposed. Over the past 8 years I have grown to love the area, not just because of the natural and historic beauty it offers, but also due to how the people of Lemanaghan cherish the culture and lands that surround them. In this letter of objection, the intension is to outline the various areas which back up my view that the progression of this project would be detrimental to the quality of life of those who live in Lemanaghan and surrounding areas.

The main grounds of objection that I would like to cover are as follows:

1. Population Health Considerations
2. Heritage and Landscape Impact
3. Disruption to Natural Habitats

1. Population Health Considerations

There are two predominant reasons that the proposed wind farm pose threat to the local residents of Lemanaghan – Turbine shadow flicker and noise.

Shadow Flicker:

A key issue with the proposed project is that it would cause immense visual dominance across the skyline of many homes in the Lemanaghan area. Not only would this take away from the rural beauty and character of Lemanaghan, but it is certain that a large number of homes would experience shadow flicker, and this is confirmed in [Chapter 5 - Population and Human Health](#). As part of this application, the HSE requested that Bord na Mona complete a shadow flicker assessment to assess the impact that the proposed turbines would have on nearby residential dwellings. This project proposes turbines of height 220 meters, the likes of which have never been erected in Ireland. It is difficult to understand how this “desk-based” assessment in [Chapter 5](#) can be reliable, given that it

is fully estimation-based with no previous projects in Ireland for 220-meter turbines. The EIA admits in its own modelling that 128 sensitive receptors may experience some shadow flicker and that 58 sensitive receptors are predicted to exceed the 30 minutes/day guideline threshold before mitigation. Looking at the attached maps in Figure 1 and Figure 2, my fiancé's family home is within the shadow-flicker study area (Property 64 in [Chapter 5](#)), located approximately 1.1km from the closest turbine. The proposed placement of turbines would result in them experiencing shadow flicker due to turbine T05 at any time the sun is low in the sky in the run up to sunset. The following illustration from suncalc.org shows the current projected line of sunset for mid-May.



Figure 1 - Sunset Projection

Overlaying this on the map indicating turbine positions, it's clear from Figure 2 that the marked location (Residence 64) is at high-risk of shadow flicker from turbine T05, but also T04 and T07. As the sun's position lowers along the horizon towards sunset.

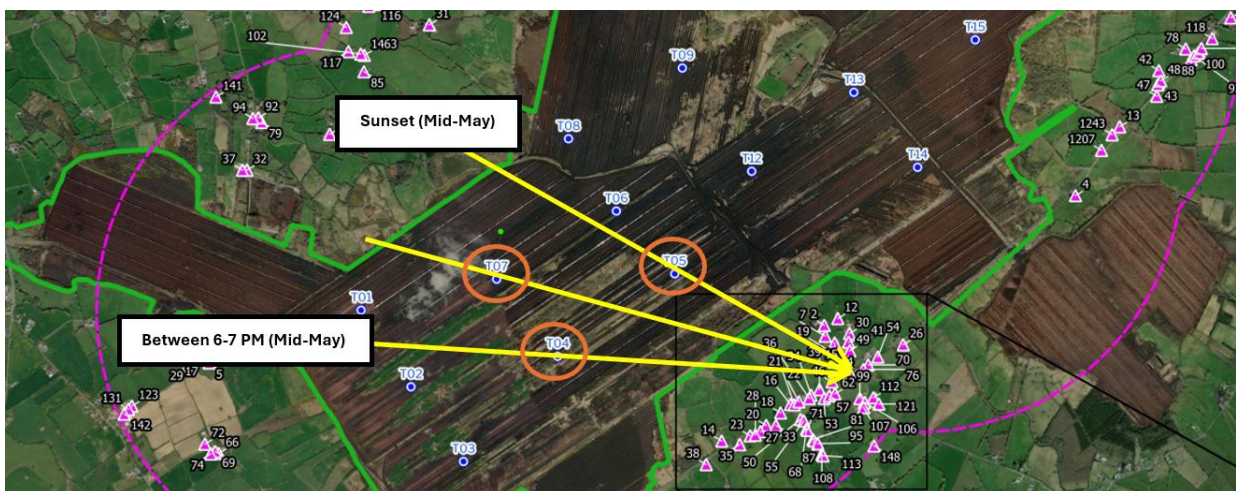


Figure 2 - Projected cause of Shadow Flicker

[Chapter 5](#) relies on the currently adopted 2006 Wind Energy Guideline shadow flicker thresholds of 30 hours per year / 30 minutes per day, but it also notes that the 2019 [draft](#) Wind Energy Guidelines recommend that “*no existing dwelling or property should experience shadow flicker*” as a result of wind energy projects. A point should be emphasised here that there is no updated Wind Energy Guidelines report, the latest version of the guidelines was promised in 2025 and has not yet been published. The EIAR states that the turbines can adhere to the stricter [draft](#) 2019 guidelines through “mitigation/shutdown controls” but this is a vague and unreliable solution, which has insufficient data to show that it would work effectively. To flippantly state that residents “may not witness” the shadow flicker if they are asleep, in another room or close their blinds, is a very weak grounds of defence, which belittles the fear that residents face of the disturbance caused by living so close to such large turbines. The applicant’s own shadow flicker assessment predicts daily exceedances at 58 sensitive receptors, which is unacceptable. It is difficult to accept that shutdown systems, monitoring, or complaint-based mitigation are sufficient protection for nearby residents. Any permission for such a project should not rely on a promise of post-consent reactive mitigation.

[Noise Impacts](#)

Another factor of risk to those living in close proximity to the proposed wind turbines is that of environmental noise produced by them when in operation. The WHO [Environmental Noise Guidelines](#) identify environmental noise as a public health issue and include wind turbine noise within their recommendations. The WHO conditionally recommends reducing wind turbine noise below 45 dB because wind turbine noise above this level is associated with adverse health effects, particularly annoyance.

One major factor that the EIAR fails to acknowledge, is that there are members of our society that this environmental noise from turbines will affect more than others. It is a well-known fact that neurodivergent individuals such as those on the Autism spectrum have heightened sensitivity to sound and light. The EIAR does not adequately assess autistic residents, autistic children, or other neurodivergent people as a vulnerable population. Such people would face the risk of sensory overload, distress, anxiety and reduced quality of life as a result of newly introduced repetitive environmental noise that would be introduced by turbines. A 2026 systematic review in [Frontiers in Psychiatry](#) states that autism is often characterised by hypersensitivity to sensory stimuli and that 70–90% of autistic individuals experience sensory difficulties and atypical auditory responses. This matters for wind turbines because turbine noise is not simply “ordinary background noise”; it can include repetitive, fluctuating aerodynamic sound, sometimes described as swish/thump amplitude modulation, which may be more intrusive than a steady sound for noise-sensitive people.

In [Chapter 12 - Noise and Vibration](#), the 30dB LA90 turbine noise contour extends to about 4.5km from each respective turbine. Looking at Figure 3 and Table 1, it is clear that the majority of the proposed turbines lie within 5km from Boher National School. Seven lie within 3km and T15 is just 1.7km away from the school. The key takeaway from this data though, is that 12 out of 15 turbines are within 4.5 km of Boher National

School. The EIAR clearly states in its turbine noise contour that the noise will extend 4.5km from each turbine. This alone is certainly grounds for a re-assessment of the potential effects on children attending the school's autism support facilities.

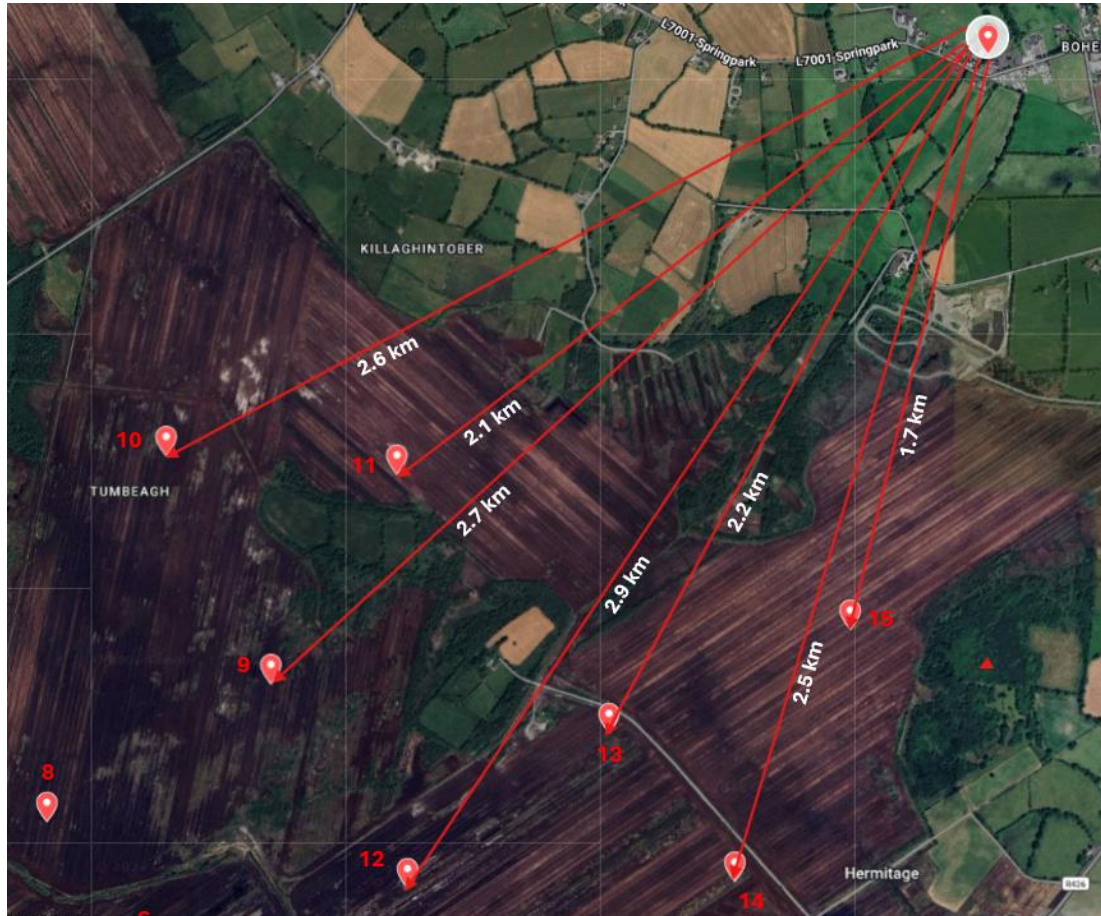


Figure 3 - Turbine Proximity from Boher National School

Turbine	Latitude	Longitude	Distance (km)
1	53.296473	-7.787008	5.049
2	53.292565	-7.782782	5.138
3	53.288756	-7.778332	5.259
4	53.294088	-7.770295	4.463
5	53.298274	-7.760297	3.694
6	53.301483	-7.765259	3.618
7	53.298034	-7.775464	4.364
8	53.305176	-7.769305	3.526
9	53.308752	-7.759593	2.778
10	53.314629	-7.764137	2.650
11	53.314169	-7.754190	2.116
12	53.303482	-7.753726	2.969
13	53.307490	-7.745001	2.287
14	53.303659	-7.739592	2.546
15	53.310146	-7.734646	1.765

Table 1 - Distances from Boher National School

There is no mention whatsoever of this cohort in the applicant's assessment, and it doesn't seem to be something they have thought through fully. The EIAR should identify autistic individuals as a significant sensitive receptor group because many have clinically recognised sensory hyper-reactivity and reduced ability to deal with the introduction of repeated or intrusive sound.

I myself have a relative with Autism, who has extremely heightened hearing ability, and can only imagine how distressed he would be if he was forced to live beside industrial turbines that produced sensory-triggering noise. This point, if nothing else, is a plea on behalf of families living in the area, and those whose children attend Boher National School's Autistic Support Unit. Families cannot afford to move house in the current housing crisis to escape the impact of these turbines on their children. They cannot take their kids out of Boher National School due to this project, as it is extremely difficult to secure places in alternative support centres – this is a known issue country-wide.

2. Heritage and landscape Impact

Another point of objection for the proposed wind farm is that in relation to protecting the cultural heritage of Lemanaghan / St. Manchan's Monastic Complex, which lies within 1.2km from the proposed turbines. This area has had an abundance of archaeological site discoveries, many of them mentioned in [Chapter 13 - Cultural Heritage](#), however it fails to adequately emphasize the importance of discovery of these sacred sites.

Figure 4 below illustrates the magnitude of archaeological sites that Lemanaghan and surrounding areas are home to - 470 known sightings of archaeological material in the Lemanaghan area. To assume that there is no likelihood of future archaeological investigations and progress with this proposed development would be detrimental to further discoveries.

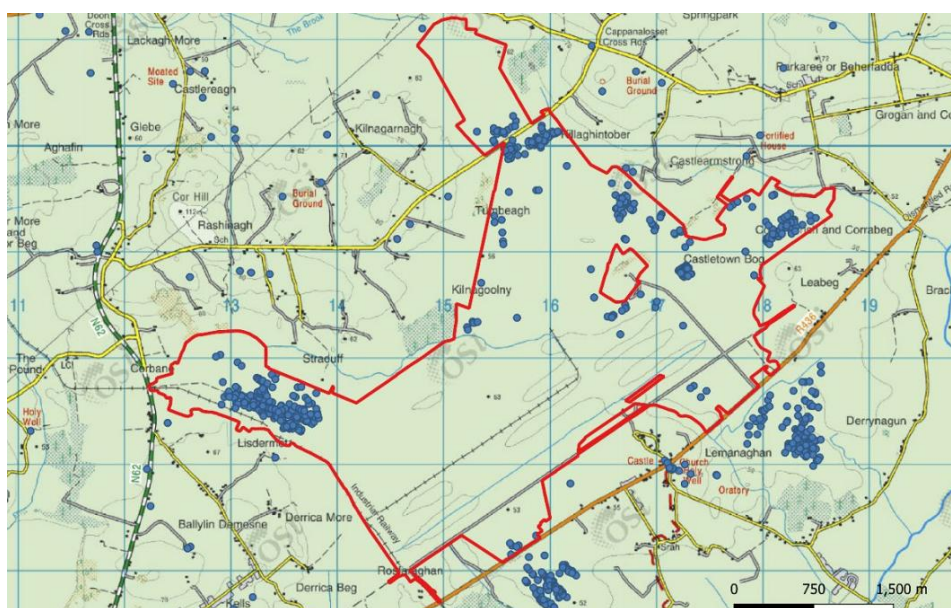


Figure 4 - Archaeological Sites in Lemanaghan (Appendix_13_7)

In 2025, the aftermath of Storm Eowyn unearthed early medieval burials at St. Mella’s Cell, an amazing discovery which gained media coverage from [RTE](#). This finding proves that further significant discoveries remain to be made in Lemanaghan, and if this project were to go ahead, we risk destroying other significant archaeological finds.

In [Chapter 13](#), it states that St Manchan’s Monastic Complex would have moderate potential visual effects, with 12-15 turbines visible from it. This is recorded proof from the applicant themselves that this project would take away from the rural beauty beheld from this cultural site.

Table 13-4: Grading of Potential visual effects according to Distance and No. of proposed turbines visible from Cultural Heritage Assets

No. of Turbines Visible (ZTV)	1-5 (1)	6-10 (2)	11-15 (3)
Distance of asset to turbine			
4-5km (1)	1	2	3
3-4km (2)	2	4	6
2-3km (3)	3	6	9
1-2km (4)	4	8	12
0-1km (5)	5	10	15
Imperceptible (0)	Not Significant (1-5)	Slight (6-10)	Moderate (11-15)

Figure 5 - Visual Effects Grading

[Photomontage VP13](#) illustrates how obstructive the proposed turbines would be to St. Manchan’s Monastic site, and [photomontage VP14](#) shows Mella’s Cell, strategically captured as if to hide the presence of the proposed turbine layout. The landscape that surrounds St. Manchan’s Monastic Complex and Mella’s Cell is truly treasured and cherished by all who live in the surrounding area. Lemanaghan is a place where heritage is thoroughly appreciated, and it is shown in how the residents take such good pride and care in conserving their local history. For these reasons, it is important to consider the impact that this project would have on the cultural landscape of Lemanaghan, by risking future archaeological discoveries but also by diminishing the natural beauty and surrounding views from these historic sites.



Figure 6 - St. Manchan's Monastic Site



Figure 7 - Mella's Cell

3. Disruption to Natural Habitats

A final point in objection to this proposed development is regarding its potential effects on the natural habitats of Lemanaghan Bog and surrounding lands. The provided surveys in [Chapter 7 - Birds](#) shows that this bog is used by protected, red-listed and Annex 1 species of birds for breeding, roosting, hunting and foraging. The EIAR itself identifies wind farm risks to birds as direct habitat loss, disturbance/displacement, barrier effects and collision mortality. This is in alignment with [NatureScot's summary](#) on the main risks that wind farms pose to birds. The proposed "enhancement areas" that the EIAR proposes would not replace the ecological value of this already-established breeding area in Lemanaghan bog, so it would not mitigate the risk of loss of breeding habitat for protected bird species.

Case Study - Birds



Whooper Swan:

The Whooper Swan is an Annex 1 species as indicated in the site survey. It has been recorded to regularly roost across 5 different areas of the project site during the winter (71 birds were recorded roosting). Whooper Swans are known to use open flooded areas for overnight roosting/feeding areas. The construction disturbance that would certainly occur with this project inflicts a high risk to the Whooper Swan species, as it would disturb its roosting habitat, not to mention the obvious collision risk that the physical turbines inflict.



Lapwing

The Lapwing is on the Red-List for birds of conservation concern in Ireland 2020-2026, according to the RSPB. The EIAR records confirmation of Lapwing breeding within the proposed project site, which characterises it as an important asset for the conservation of this protected bird species. Lapwings are open-ground breeders and require large, undisturbed habitats with good visibility to breed. By nature, these birds are sensitive to disturbance, which would be unavoidable collateral of this project's construction – turbine hardstands, access roads/amenity tracks etc.. (Appendix_07_7).



Snipe

Snipes are also Red-listed in Ireland, which means their numbers are already at risk of diminishing. Their presence on this proposed project site was indicated due to the presence of displaying males, which is a key indicator of the presence of breeding. “[Displaying](#)” is how male birds perform instinctive rituals to attract a mate or defend territory.

There is external evidence that presents a [multi-site study](#) of breeding birds in the UK in proximity to wind farms. It recorded reduced occurrences close to turbines for a number of species, and the Snipe was one of these. The findings of the study suggests that the rate of these birds breeding may reduce by as much as 53% within 500m from turbines. This point alone is sufficient to decline this application. If birds are proven to avoid areas around turbines, access tracks or zones of construction, the resulting potential decrease in breeding rates of protected Red-List species such as the Snipe should be significant grounds to reconsider this whole project.

4. Concluding Remarks

To conclude, I respectfully request that An Coimisiún Pleanála refuse permission for the proposed development at Lemanaghan Bog. This development would cause unacceptable harm to the people, landscape, heritage and natural environment of the Lemanaghan area. The scale and proximity of the proposed turbines would introduce immense visual impact to those who treasure the beautiful rural setting in which they live, along with the high-risk of experiencing shadow flicker. This project also threatens the conservation of sacred historic sites, and any future archaeological works in the bog and surrounding areas. The projected disturbance and destruction of natural habitats is confirmed through the applicant’s own surveys. This point alone should prevent the acceptance of this application. Ireland is known for it’s natural beauty and it’s people who admire it. I believe the proposed development is inappropriate for this location and would have long-term negative consequences for residents, cultural heritage and biodiversity, and I strongly request that planning permission for the Lemanaghan Wind Farm be refused.

Yours sincerely,

Robyn Seery