

Name: Tom Corcoran, Leamonaghan, Ballycumber, Tullamore, Co. Offaly. R35 k263

Case Reference Number: PAX19.324161 at Lemaghan and surrounding townlands, Co. Offaly (www.lemanaghanwindfarmplanning.ie) Proposed development of 15 no. wind turbines, a permanent 220kv on-site substation, and associated infrastructure.

Dear Sir / Madam,

I hereby submit my observation regarding the above Case Reference.

1. Turbine T05 and Offaly County Development Plan Compliance

The Planning Report acknowledges *Section 3.2.3.3.1 Suitability of Lemaghan Bog of Chapter 03 Site Selection and Reasonable Alternatives* that Turbine T05 “is located on the boundary of an area designated not deemed suitable for wind energy developments” in the [*Offaly County Development Plan \(OCDP\) 2021 – 2027*](#). The SID designation means the application bypasses Offaly County Council and goes directly to ACP. This does not mean that ACP can ignore development plan policy. Under section 37F of the Planning and Development Act 2000, ACP must have regard to the development plan when determining a SID application.

The *Offaly County Development Plan 2021 – 2027* was itself the product of considerable political controversy. Over 2300 submissions were made to Offaly County Council requesting that Lemaghan Bog not be considered in the wind energy zone. Offaly County Council did not listen to the local community. The Council voted nine to eight to include the bog in the wind energy zone, with the exception of an area nearest the monastic site, and north of the Banagher Line (disused Banagher railway line). T05’s location on this area of ground is not a minor issue, it is a major issue, and it goes against the principle of the development’s compliance with the statutory development plan.

2. St Manchan’s Monastic Site and Recent Archaeological Discoveries

The heritage and archaeological significance of Lemaghan bog is now materially greater than when the project design was first conceived. In early 2025, human remains were discovered at St Mella’s Cell, which is within the Monastic Site at Lemaghan. This finding was reported on by the RTE this year - [*Monastic remains uncovered after Storm Éowyn*](#). The remains were exposed when four Scots Pine trees were blown down and uprooted during Storm Eowyn. The remains were carbon dated to between 662 AD and 939 AD – contemporaneous with St. Manchan himself who died in 664 AD. This discovery has not been identified by archaeological baseline

surveys carried out for the proposed project. The EIAR heritage chapter has not addressed this discovery and the question of whether further remains, or other archaeological features may be present within or proximate to the proposed wind farm, are unknown. The National Monuments Service and the National Museum of Ireland will not be happy that the Heritage chapter has been prepared without the full knowledge of the site's burial significance.

3. Unauthorised Peat Harvesting of Lemanaghan Bog

For decades, Bord na Mona have milled peat on an industrial scale without proper compliance under EU law.

The EU EIA Directive (85/337/EEC, as amended, now codified in [Directive 2011/92/EU](#)) requires that projects likely to have significant effects on the environment receive development consent only after an environmental impact assessment. Bord na Mona's entire Midland's estate, including Lemanaghan Bog, proceeded without any EIA or planning permission for decades, which renders every hectare of commercial extraction, unauthorised EIA development in EU law terms.

In September 2025, Bord na Mona (through its subsidiary Bord na Mona Energy Limited) submitted a fresh single stage Substitute Consent application for Lemanaghan Bog ([ACP Ref. SU19.323676](#)), prepared by MKO, covering peat extraction and ancillary works from July 1988. A decision on this has not been determined yet.

The planning application documents for the wind farm acknowledge the existence of the Substitute Consent application in the Planning Report's section 3.3.1. They note that the EIAR and NIS surveys were used to inform the wind farm EIAR, and that the Draft Cutaway Bog Rehabilitation Plan has been taken into account. An EIAR must describe the "current state of the environment" as the baseline against which the likely significant effects of the proposed development are assessed. The EPA's 2022 Guidelines on the Information to be contained in Environmental Impact Assessment Reports require that the description of the existing environment be objective, factual and based on robust survey data.

At Lemanaghan bog, however the "existing environment" is a heavily industrially modified, drained cutaway peatland, the direct product of decades of unauthorised commercial harvesting without EIA. The planning application for the wind farm describes the site as comprising "bare cutaway peat, re-vegetated bare peat, degraded raised bog, scrub, low woodland and remnants of high bog" and confirms that "the application site was formerly subject to commercial peat extraction, which ceased in June 2020.

Where existing environmental conditions are themselves the product of prior unauthorised EIA Development, the EIAR must establish a baseline reflecting a reasonable estimation of the environment that would have existed prior to the unauthorised development. This is termed the "lawful counterfactual" or "pre-

development” baseline. For Lemanaghan Bog, this means the baseline should seek to reconstruct, as far as available evidence allows, the ecological, hydrological and carbon conditions of the bog before industrial peat harvesting commenced - July 1988 (the date from which SC Ref. 323676 seeks to regularise extraction) or 1994 when the Habitats Directive entered into force.

Critically, the NIS submitted under the SC application ([Ref 323676](#)) acknowledges that surveys overlap with those prepared for the windfarm EIAR. However, surveys undertaken against the current degraded baseline do not automatically satisfy the requirement to reconstruct the pre-disturbance condition. The concern is that the windfarm EIAR has used the degraded post-harvesting state of the bog as its baseline – effectively permitting Bord na Mona to use the consequences of its own unlawful activity as the starting point for environmental assessment, a position that EU law does not permit.

4. Carbon Flux and Ongoing Emissions

This issue has been specifically and publicly identified by [Friends of the Irish Environment](#) in the context of Bord na Mona’s other bog wind farm projects, and it applies directly to Lemanaghan. Drained, cutaway peatlands are net carbon emitters - releasing Carbon Dioxide and methane at significant rates as the remaining peat oxidises and anaerobic conditions are lost. Recent scientific analysis has substantially revised upward estimates of the carbon content of Irish peatlands, with some studies indicating that cutaway bogs contain three times more carbon than previously understood.

An EIAR for a wind farm on former peatland that does not quantify the current carbon flux from the drained bog cannot properly assess the net climate benefit of the proposed development.

The construction of the proposed windfarm will prevent the bog from being rewetted and returned to its natural state. According to [Teagasc](#), a rewetted bog absorbs 10 times more carbon from the atmosphere than any forest of a similar size in area. A rewetted bog is far more beneficial to the Environment than any windfarm.

5. Chapter 5 – Population and Human Health

Looking at the map on page 55 of [Chapter 5](#), I ascertain that my family home is numbered 64. Based on that, it states that Turbine no 5 will be the nearest to my family home and will be 1142 meters from my home. The rear of my family home will be surrounded by the proposed Wind Farm, with all 15 turbines in close proximity to my family home, and in full sight.

As a family, we spend most of our days and evenings at the rear of the house, as the front of the house is on the main road – R436. The report states that Turbine no 5 will cast a shadow flicker on my home (page 59), and that the shadow flicker is

expected to exceed the “threshold time” by 47 days in the year (page 100) from 29th May until 15th July inclusive. That time of the year is one of the nicest times of the year to be outdoors, and now Bord na Mona want to take that away from us. We will suffer from excessive shadow flicker. How are we expected to live our lives with shadow flicker interrupting our ability to admire and take in the beautiful landscape in Lemanaghan?

The report states that shadow flicker is not considered significant, and they have suggested some mitigation. It might not be significant to Bord na Mona (who will not have to live alongside the proposed wind farm), but for those living in the area, and who will be affected by shadow flicker, it's of enormous significance. It will have a negative impact on my mental health, my quality of life and that of my neighbours. Fifteen wind turbines that will have blades spinning around will have a huge effect of my mental health as I will never be able to enjoy the outdoors again.

This particular turbine (no 5) is the turbine that is being placed on the “area deemed unsuitable for wind farm” by Offaly County Council. A total of 157 houses will be affected by shadow flicker. This is a huge number of families that are expected to endure shadow flicker for the life of the windfarm. The report suggests that they will programme the system so that the respective turbines could be “turned off” for the times that the shadow flicker will exceed the threshold times for 58 of those houses. Do they really expect us to believe that? They have the nerve to suggest that blinds can be purchased for the rooms of the houses that are affected by shadow flicker, or a hedge could be planted. These are unbelievable “solutions” that they propose. We are country people. We live and work out doors most of the time, and cherish the beautiful lands that surround us.

6. Chapter 14 – Landscape and Visual

As mentioned in the previous section, as a family, we spend most of our days and evenings at the rear of our house. All of the proposed wind turbines will be visible from the rear of my home. They will dominate the entire skyline. Fifteen turbines with moving blades will be visible during daylight hours, and they will destroy the natural beauty of the landscape. The peace and tranquillity associated with Lemanaghan will be taken away from the local community, and for those that come to visit the Monastic Site. My enjoyment and view of the sunset will be taken away from me, and lost forever.

Please refer to [Photomontage VP12 – St Manchans Estate](#). This gives a clear picture of the scale of the turbines at the rear of our home. No human being should have the majority of a skyline taken away from them by a Wind Farm that is not needed in the area. No person should have to live their life with 15 large scale turbines on their doorstep, and dominating their lives. The wind farm will have a negative impact on my life, my family and my neighbours.

7. Chapter 13 – Cultural Heritage / Volume 2 Photomontage

The Monastic Site at Lemanaghan: The heritage and history of Lemanaghan have been upheld and preserved by the people of Lemanaghan for generations. Lemanaghan has often been described as a hidden gem in the midlands, because it has basically been untouched by modern society. The story of St Manchan is held very dear in the hearts of the people of Lemanaghan, and by the many people who visit his Holy Well every Friday. There are many national and international visitors to the site, and all are intrigued by the uniqueness of the area and the story of St Manchan.

Many books have been written about St Manchan and Lemanaghan. The first book written was by Fr. James Greaves in 1875. It tells the story of St Manchan, his holy cow, his monastery, and the shrine of St Manchan. In circa 2001, Ellen O Carroll published a book called *“The archaeology of Lemanaghan – the story of an Irish bog”* And in recent years, Caimin O’Brien published a fabulous hard covered book called *“Stories from a Sacred Landscape – Croghan Hill to Clonmacnoise”* in which chapter 12 is totally dedicated to Lemanaghan – *Grey lands of Manchan*.

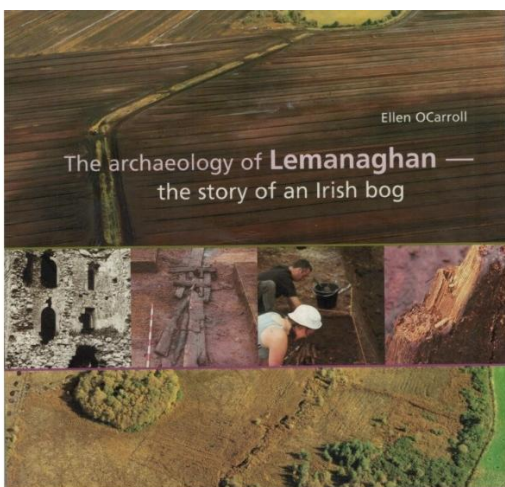


Figure 1 - The archaeology of Lemanaghan

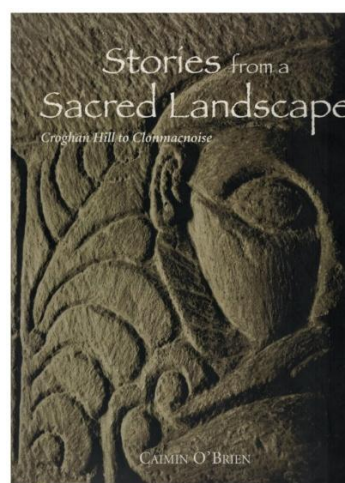


Figure 2 - Stories from a Sacred Landscape

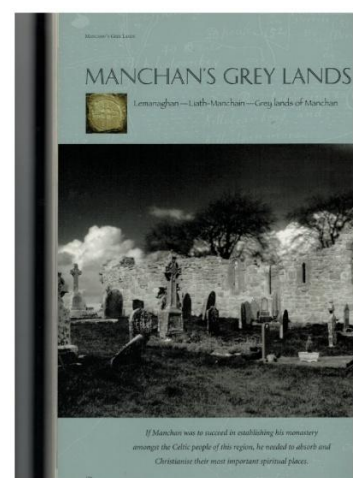


Figure 3 - Manchan's Grey Lands

Lemanaghan itself has been the subject of several television documentaries, the first was by Cathal Shannon back in the 70's, when he spoke with many of the locals regarding the tradition of farmers not selling milk in Lemanaghan in honour of St Manchan. St Manchan had a sacred cow, and St Manchan gave milk freely to anyone who needed it. The most recent television documentary was by John Creedon in 2018 where travelled around Ireland visiting parts that were considered unique and overlooked in *“Roads Less Travelled”*.

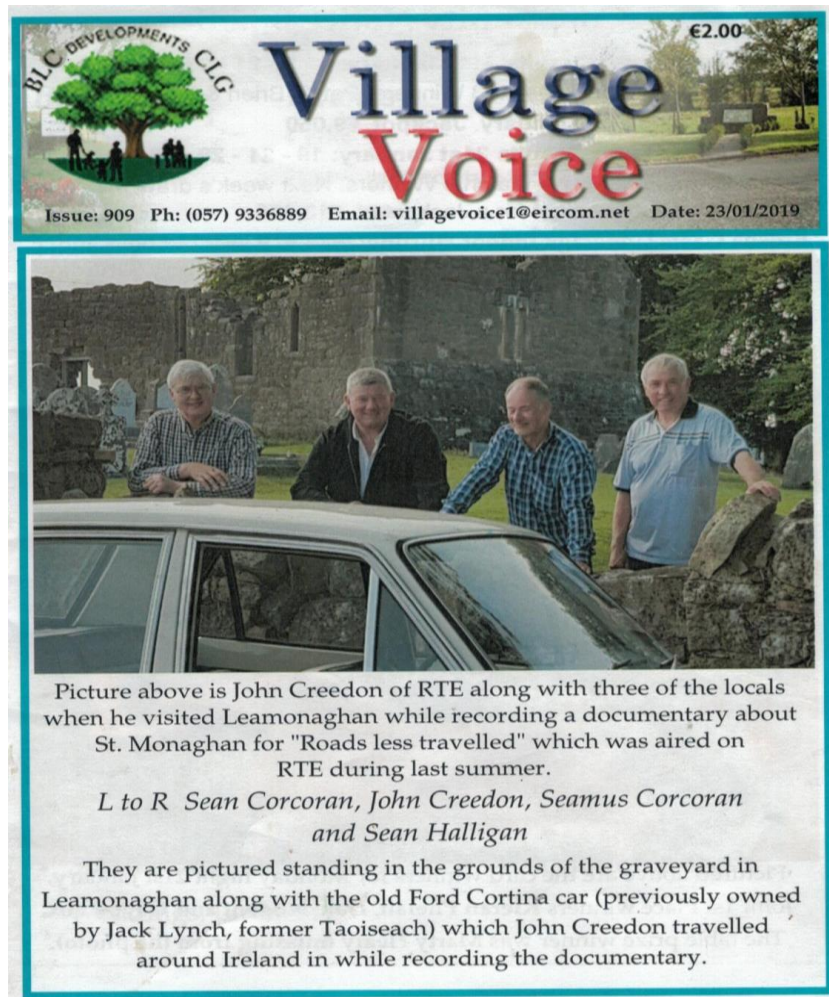


Figure 4 - "Roads Less Travelled" RTE documentary featuring Lemanaghan

As evidenced from the above, there is a massive interest in Lemanaghan.

[Photomontage VP 13A + B](#) states that the Monastic Site is 1.2km southeast of the nearest Turbine (No.5).

The sight of the Turbines in the near distance shown in the photographs, will have a major negative impact on the Monastic Site. However, the pictures appear taken from a similar angle and do not give a true reflection of the enormity of the proposed wind turbines.

[Photomontage VP14](#) states that Mella's Cell is 1.28km from the nearest Turbine (No. 14). Again, all the photographs seem to be taken from a similar angle to try and mask the impact of these proposed turbines. The images are taken from the same area (corner) of the Cell, and do not reflect what the reality of the situation will be if the proposed wind turbines are given permission.

When one walks from Mella's Cell, up the Togher, to the Holy Well and Monastery, they will have full view of all of the Turbines. This will have a detrimental effect on the "peacefulness and serenity" of this walk, which is a very important part of the experience of visiting the site.

We have calculated the distances from each proposed turbine to St. Manchan's Monastic Site and Mella's Cell, and illustrated it below in Figure 5 and Table 1.

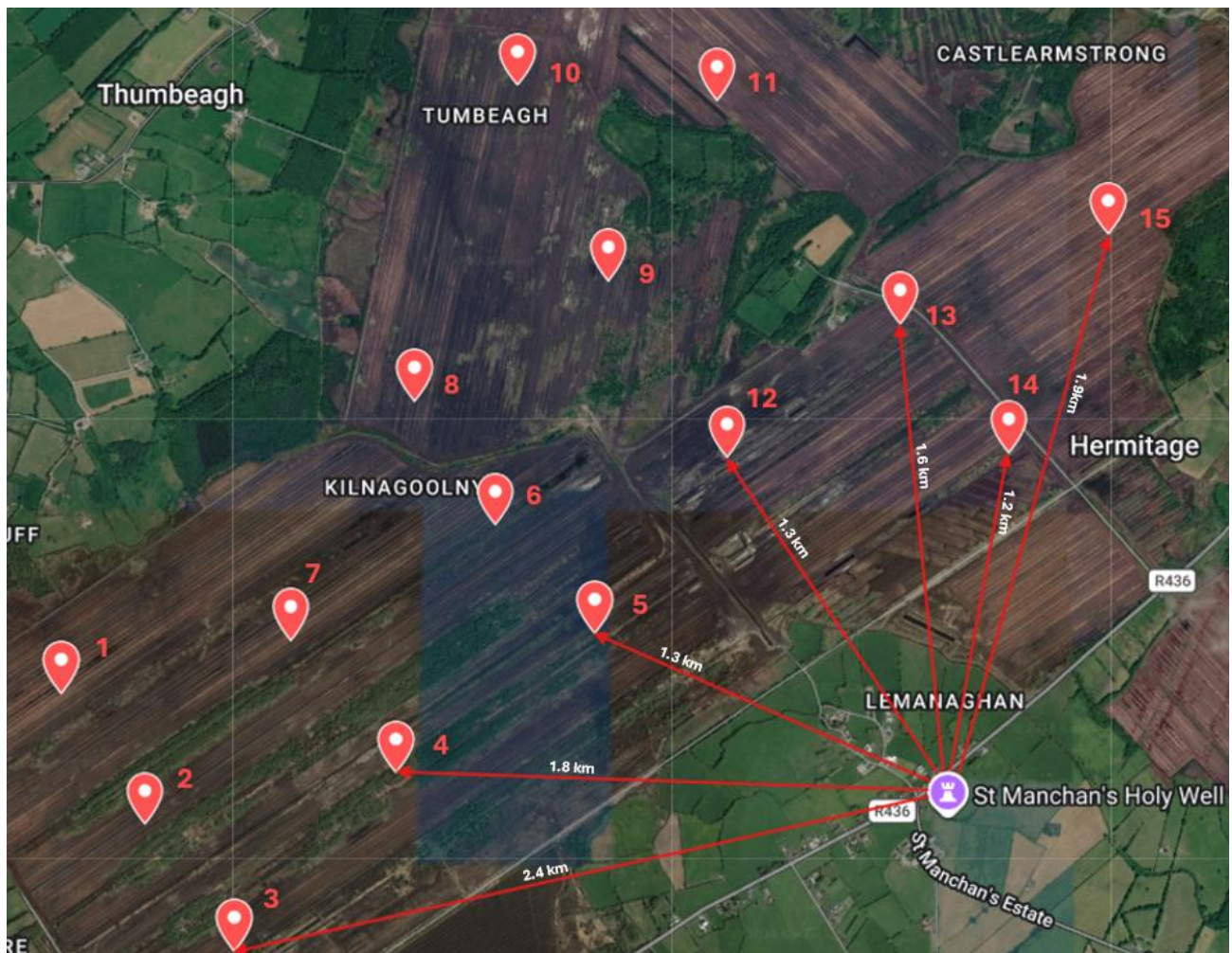


Figure 5 - Proposed turbine distances from St. Manchan's Monastic Site

Table 1 shows that seven of the proposed turbines will only be a distance of between 1.2 kms and 1.9kms from St Manchans Monastery/Holy Well, and the remaining eight will only be between 2km and 2.9kms

It also shows that five of the proposed turbines will only be a distance of between 1.2kms and 1.7kms from Mella's Cell, with the remaining ten will only be between 2.1kms and 3.3kms.

Turbine	Latitude	Longitude	Distance from St. Manchán's (km)	Distance from Mella's Cell (km)
1	53.2965	-7.787	2.99	3.334
2	53.2926	-7.7828	2.684	3.024
3	53.2888	-7.7783	2.433	2.76
4	53.2941	-7.7703	1.858	2.201
5	53.2983	-7.7603	1.329	1.659
6	53.3015	-7.7653	1.791	2.11
7	53.298	-7.7755	2.269	2.611
8	53.3052	-7.7693	2.247	2.552
9	53.3088	-7.7596	2.097	2.337
10	53.3146	-7.7641	2.811	3.039
11	53.3142	-7.7542	2.487	2.658
12	53.3035	-7.7537	1.393	1.638
13	53.3075	-7.745	1.627	1.744
14	53.3037	-7.7396	1.207	1.25
15	53.3101	-7.7346	1.982	1.97

Table 1 - Proposed Turbine distances from historic sites

Hereunder are a few photographs which were taken in November 2020 of St Manchans monastery in the old graveyard. They were taken from different locations in the graveyard. They showcase the natural beauty of the site and the surrounding landscape. The proposed turbines do nothing but destroy the natural beauty of these quaint and sacred sites in Lemanaghan. They will have a catastrophic effect on the area, and all the people who live in Lemanaghan.



Figure 6 - St. Manchan's - Looking East/North-East



Figure 7 - St. Manchan's - Looking North-East



Figure 8 - St. Manchan's - Looking West



Figure 9 - St. Manchan's - Looking West



Figure 10 - Mella's Cell - Looking North

8. Concluding Remarks

The proposed wind farm will undermine and overshadow the sense of peace and tranquillity that prevails in the area of Lemanaghan. It will destroy the beauty and fabric of our heritage as the proposed turbines will dominate the Monastic Site. The serenity and stillness associated with the Monastic Site will be destroyed if the proposed wind farm is allowed to proceed.

Our heritage is very important and it makes us what we are. Please don't take this away from us. Do not destroy our heritage. I ask you not to destroy the lives of the people of Lemanaghan.

I strongly object to the development of a wind farm on Lemanaghan Bog. It would be a major miscarriage of justice if approval is given.

Tom Corcoran

19/05/2026