

Date: 24th May 2026

RE: FORMAL SUBMISSION / OBSERVATION ON A STRATEGIC  
INFRASTRUCTURE DEVELOPMENT

Planning Authority: Offaly County Council

- An Coimisiún Pleanála Case Reference: ABP-324161
- Proposed Development: Lemanaghan Wind Farm (15 No. 220m Wind Turbines & Associated Infrastructure)
- Applicant: Lemanaghan Wind Farm Ltd.

Observer Details:

- Full Name of Observer: Tom Egan & Hilda Dolan
- Full Postal Address: Kilnagarnagh, Ballinahown, Athlone, Co. Offaly, N37 YN24

Dear Secretary,

We, Tom Egan & Hilda Dolan of Kilnagarnagh, wish to lodge a formal statutory observation objecting to the proposed Strategic Infrastructure Development (SID) referenced above.

As a resident whose household is directly impacted by this site boundary, I strongly request that An Coimisiún Pleanála refuse planning permission for this development. The core planning arguments, environmental considerations, public health impacts, and deep heritage conflicts are detailed comprehensively in the attached, multi-page document titled "*Grounds of Observation: Lemanaghan Wind Farm Objection*".

Please find enclosed the statutory observation fee of €50, paid in full via card

I kindly request written confirmation of receipt and validation of this submission, alongside notice of any future updates, oral hearings, or the final determination on this application.

Yours sincerely,

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Tom Egan & Hilda Dolan

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## Grounds of Observation: Lemanaghan Wind Farm Objection

### 1. Human Health, Residential Amenity, and Vulnerable Occupants

The immense scale of the proposed 220m turbines will impose severe, long-term health risks on local residents, violating our fundamental right to safe residential amenity in our home:

- **Direct Proximity to Turbines:** Our home is situated a mere 1.7km from the nearest proposed turbine as mapped on the [Lemanaghan Wind Farm Application Portal](#). At this close proximity, the physical scale of the structures removes any meaningful protective buffer zone.
- **Vulnerable Occupants:** Our household includes individuals diagnosed with Multiple Sclerosis (MS) and complex inner ear/vestibular disorders who are highly sensitive to environmental stressors.
- **Low-Frequency Noise:** Continuous aerodynamic and low-frequency noise generated by massive 150-metre diameter rotor blades directly exacerbates vestibular dysfunction, triggering severe vertigo, loss of balance, and cognitive fatigue.
- **Shadow Flicker:** The sweeping area of the 150m rotors creates far-reaching, high-contrast shadow flicker [Going Coastal Ecology](#). At 1.7km, this rhythmic light disruption acts as a documented neurological stressor, accelerating central nervous system fatigue in vulnerable individuals.

### 2. Destruction of Irreplaceable Peatland Biodiversity

Lemanaghan Bog is a highly sensitive wetland ecosystem that cannot survive industrialization:

- **Quantifiable Habitat Loss:** The developer's own documentation admits a permanent loss of 1.66 hectares of key natural habitat. This represents a severe, irreversible scar on a highly sensitive ecosystem.
- **Wildlife Displacement:** Cross-border ecological data submitted to the [European Parliament Environmental Registry](#) reveals that massive wind farm developments displace up to 63% of local bird species and 67% of native mammals up to 5km away from the turbine cluster. This project will trigger a localized ecological collapse, directly conflicting with the state's declared biodiversity emergency.

### 3. Severe Financial Impact on Local Property Valuations

The industrialization of this rural landscape imposes an unfair, uncompensated financial penalty on the local community:

- Devaluation Estimates: Empirical evidence from comparable Irish rural communities near large-scale wind developments demonstrates a stark drop in residential property values ranging between €40,000 and €50,000.
- Global Precedent: Extensive spatial difference-in-differences analysis archived by [ResearchGate](#) indicates that properties whose visual landscapes are strongly affected by the construction of industrial wind turbines experience a significant asking price drop of 10% to 17%.

#### 4. Severe Visual Degradation and Industrialisation of a Rural Landscape

The introduction of 15 industrial structures taller than any naturally occurring feature will permanently scar this region:

- Unprecedented Industrial Scale: The proposed turbines feature an enormous 150-metre blade diameter, meaning the sweeping blades alone span a distance greater than the length of a professional sports stadium.
- Industrialisation of a Rural Landscape: As detailed by the [Midlands 103 News Report on Lemanaghan Bog](#), community groups have formally voiced major opposition against turning this open, flat topography into an over-concentrated dumping ground for heavy industry.

#### 5. The Massive Cooldorragh Substation Development

In addition to the turbine array, the accompanying grid infrastructure introduces an unacceptably large industrial compound into a rural zone:

- Substation Dimensions: The proposed substation building at Cooldorragh is of an unprecedented industrial scale for this area, measuring an astonishing 25 to 26 metres in height and spanning 107 to 119 metres in length.
- Proximity to Our Home: This massive industrial complex is located just 1.2km from our residence. A building of this height (equivalent to an 8-story building) and length (longer than a football pitch) completely destroys the rural context of Cooldorragh.
- Continuous Operational Impacts: At 1.2km, our household will be subjected to the continuous low-frequency hum of electrical transformers, cooling fans, and high-voltage grid infrastructure, compounding the noise pollution generated by the 1.7km-distant turbines.

#### 6. Catastrophic Carbon Release and Peatland Destruction

Siting a wind farm on deep peat to reduce emissions is a profound scientific contradiction:

- **Carbon Storehouse:** Intact peatlands are highly efficient carbon sinks. Studies highlighted by the [World Economic Forum Climate Platform](#) confirm that while peatlands cover just 3% of the Earth's surface, they store nearly a third of the world's carbon—double the amount sequestered in all global forests combined.
- **Concrete Saturation:** Each of the 15 turbine foundations requires thousands of tonnes of reinforced concrete poured deep into the bog's core.
- **Irreversible Damage:** This massive displacement causes widespread drainage. Instead of sequestering carbon, the disturbed bog will rapidly decompose, venting thousands of tonnes of stored  $\text{CO}_2$  into the atmosphere—an ecological debt that can never be undone.

## 7. Irreparable Risk to World-Class Archaeological Heritage

Lemanaghan Bog holds an internationally significant early Christian and medieval heritage landscape that remains largely unexcavated, representing a finite repository of Irish history:

- **Historical Monastic Core:** Founded in 665 AD, the Lemanaghan monastic site features 491 recorded archaeological monuments cataloged across the immediate landscape, indicating an incredibly dense, interconnected zone of ancient human activity.
- **The Slí Mór Pilgrim Path:** The bog forms a vital component of the Slí Mór, one of Ireland's ancient five great royal highways and a legendary medieval pilgrim path.
- **Preserved Human Remains:** The bog acts as a highly preservative environment holding vast undiscovered history, highlighted by the discovery of a 2,000-year-old bog body within the area.
- **The St. Mella's Cell Discovery:** The immense danger of subsurface disturbance was proven when Storm Éowyn uprooted trees at St. Mella's Cell, exposing an intact burial site [RTÉ News](#). As analyzed in the [Irish Examiner Spotlight](#), radiocarbon dating confirmed these burials are at least 1,000 years old, placing them directly within the living era of St. Manchán. Pounding heavy pile-drivers and excavating deep foundations will inevitably pulverize and destroy these unmapped, highly preserved archaeological layers.

## 8. Deep Personal, Historical, and Revolutionary Ties

The opposition to this development is deeply rooted in the living history of the bog and its people:

- Derravane House: My grandmother came from Derravane House, an island of dry land uniquely situated deep within Lemanaghan Bog.
- Revolutionary Sanctuary: Because of its isolated, secure positioning within the bog, Derravane House served as a vital safe house for injured Republican soldiers during historical conflicts. This significant local history is validated by official historical records from the Royal Irish Academy (RIA) and military archives detailing the area's role in Ireland's struggle for independence. To industrialize this land is to systematically erase the physical landscape that provided sanctuary to our ancestors.

## Conclusion and Request for Refusal

In conclusion, the scale and location of the proposed Lemanaghan Wind Farm present an unacceptable conflict with national planning guidelines, environmental protection policies, and public health standards. Siting 220-metre industrial turbines a mere 1.7km from our home, alongside a massive 26-metre-high substation complex just 1.2km away, will severely compromise the medical stability of vulnerable members of our household.

Furthermore, the permanent loss of 1.66 hectares of sensitive wetland, the catastrophic disturbance of deep peat carbon stores, and the industrialisation of an intact landscape containing 491 recorded archaeological monuments cannot be justified or mitigated. To compromise the ancient integrity of the Slí Mór pilgrim path and a landscape that historically offered sanctuary to our ancestors at Derravane House would be an irreversible loss to our family, the local community, and Ireland's national heritage.

Therefore, we respectfully and urgently request that An Coimisiún Pleanála uphold the principles of sustainable development, protect vulnerable citizens, preserve our natural and revolutionary history, and refuse planning permission for this application in its entirety.

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