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To Whom it may concern

We would like to appeal against the Windfarm proposed for Leamonaghan Bog Co. Offaly for the following Many reasons, We are one of the 19 houses within 1000metres. We also own the land down to and meeting the bog so the proposed windmills will only be a couple of hundrend metres away from our land where we keep horses, cut Turf and enjoy the peaceful surroundings. Some of our many reasons are as Follows.

1.Noise & Vibration Impacts

The noise modelling presented is inadequate and does not reflect real-world conditions. Issues include:

- Failure to account for low-frequency noise, which travels further over flat bogland
- Underestimation of amplitude modulation, a known issue with turbines
- No assessment of night-time noise impacts on nearby homes
- No consideration of construction vibration on unstable peat

Under the Environmental Noise Regulations (S.I. 140/2006), the applicant must demonstrate that noise will not adversely affect human health. They have not done so.

2. Climate Impact & Carbon Emissions from Peat Disturbance

Peatlands are among the most carbon-rich ecosystems in Europe. Disturbing peat releases large quantities of stored carbon. The application fails to quantify:

- Carbon loss from peat excavation
- Emissions from drainage
- Loss of long-term carbon sequestration capacity
- Construction-related emissions

This contradicts Ireland's obligations under:

- The Climate Action and Low Carbon Development Act 2021
- The EU Climate Law (Regulation (EU) 2021/1119)

A development that increases carbon emissions from peatland disturbance cannot be justified in the current climate emergency.

3. Legal Compliance Failures

The application appears to breach multiple legal requirements, including:

- EIA Directive (2011/92/EU as amended by 2014/52/EU) – due to inadequate environmental assessment
- Habitats Directive – due to insufficient ecological surveys
- Water Framework Directive – due to hydrological risks
- Aarhus Convention – due to lack of meaningful public participation
- Irish Planning and Development Act 2000 (as amended) – due to incomplete or misleading environmental information

4. Loss of Residential Amenity

Residents living adjacent to the bog will experience a profound and permanent loss of amenity. This includes:

- Visual intrusion from turbines that dominate the skyline
- Loss of tranquillity in what is currently a quiet rural environment
- Increased traffic, noise, and disruption during construction
- Reduced enjoyment of outdoor spaces, including gardens, walking routes, and farmland

Irish planning law requires that developments must not “seriously injure the amenities of the area” (Planning and Development Act 2000, as amended). This proposal clearly fails that test.

5. Shadow Flicker, Property Devaluation, Cumulative Impacts, Tourism & Agricultural Disruption

1. Shadow Flicker Impacts on Residents

Shadow flicker occurs when rotating turbine blades cast moving shadows over nearby homes. This effect is known to cause:

- Headaches and migraines
- Stress and anxiety
- Difficulty concentrating
- Sleep disturbance
- Reduced quality of life

The applicant’s shadow-flicker assessment is inadequate for several reasons:

- It relies on idealised modelling rather than real-world conditions.
- It does not account for weather variability, which can increase flicker unpredictably.
- It fails to consider reflected flicker from water surfaces or wet peat.
- It does not provide guaranteed mitigation, only vague commitments.

Under the Wind Energy Development Guidelines (2006) and the draft 2019 Guidelines, developers must demonstrate that shadow flicker will not exceed acceptable limits. The applicant has not done so.

6. Property Devaluation

There is substantial evidence, including from international studies and Irish case law, that proximity to large-scale wind turbines can lead to:

- **Reduced property value of 50%**
- Difficulty selling homes
- Loss of long-term investment value

Homes located near turbines often experience:

- Noise disturbance
- Visual intrusion
- Shadow flicker
- Increased traffic
- Loss of rural character

These factors directly impact market value. The applicant has not provided any assessment of property-value impacts, despite the clear requirement under the Planning and Development Act 2000 to consider effects on residential amenity and economic wellbeing.

Residents should not be forced to bear the financial burden of a development from which they receive no benefit.

Cumulative Impacts Ignored

The area already hosts or is adjacent to:

- Existing wind farms
- Grid infrastructure
- Peat extraction sites

- Bog restoration projects
- Heavy-vehicle traffic routes

7. The applicant has not carried out a proper cumulative impact assessment, despite this being a legal requirement under the EIA Directive (2011/92/EU as amended by 2014/52/EU).

Cumulative impacts include:

- Combined noise levels
- Combined visual intrusion
- Combined traffic impacts
- Combined ecological disturbance
- Combined hydrological changes

Without a full cumulative assessment, the application is incomplete and cannot be approved.

Where legal compliance is uncertain, the application must be refused

Conclusion

This development poses unacceptable risks to hydrology, peat stability, biodiversity, road safety, noise levels, and climate obligations. The environmental assessments provided are incomplete, inadequate, and in several cases legally deficient. The precautionary principle, Irish planning law, and EU environmental legislation all support refusal of this application.

I only hope these letters are taken into consideration.

Yours faithfully

Tracy and Paul Pigott