

An Coimisiún Pleanála  
64 Marlborough Street  
Rotunda  
Dublin 1  
D01V902

Case reference: PAX19.324161  
Lemanaghan Wind Farm

Pleanala Ref. PCX19.342161

Re: Proposed wind farm of 15 turbines, a permanent 220 kV on-site  
substation and associated infrastructure, etc.

Applicant: Lemanaghan Wind Farm DAC

Dear Sir/Madam

This is a third-party submission/observation on the above SID  
application, which is accompanied by attachments and the third-  
party observation fee of €50

The observer: Cahal Maher  
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Yours, Cahal Maher

## **Archaeological assessment: Lemanaghan Bog Wind Farm — refusal grounds**

The application should be refused on archaeological and cultural-heritage grounds because the submitted EIAR itself identifies Lemanaghan as a **high-sensitivity archaeological landscape**, yet treats impacts on its wider monastic, peatland and routeway setting as acceptable rather than determinative.

### **1. National significance of Lemanaghan**

The Heritage Council's *Lemanaghan Conservation Plan* states that the site is of **national archaeological significance** and exceptional for the survival of ecclesiastical and secular features with associated infrastructure. The EIAR repeats this significance: Chapter 13 records the 7th-century foundation, the church, graveyard, St Manchán's House, bullaun stones, holy well, hermitage/St Mella's Cell, ecclesiastical enclosure, cross-slabs, tower house and deserted medieval settlement. See **Chapter 13, pp. 13-73 to 13-75** and **Appendix 13-5, pp. 1-4**.

### **2. The bog is not peripheral: it is part of the archaeological landscape**

Appendix 13-7 confirms that Lemanaghan Bog contains **470 SMR entries** from the Irish Archaeological Wetland Unit peatland survey, and only two RMP monuments were known before that work, showing that the peatland record is extensive and historically under-detected. See **Appendix 13-7, pp. 3-5 and p. 13**.

The same appendix records **47 stray finds** from the Lemanaghan Bog complex, including leather shoes, wooden vessels, silver coins, a copper dagger and a carved wooden crozier. See **Appendix 13-7, pp. 13-14**.

### **3. High potential for further archaeology remains unresolved**

The applicant's own material states that a previous assessment found **moderate to high potential for archaeological heritage to be uncovered during future development works in Lemanaghan Bog**. See **Appendix 13-7, p. 13**.

This is a refusal issue because the proposed wind farm involves turbines, hardstands, roads, borrow pits, peat deposition areas, cabling, compounds and a substation across a peatland landscape. Chapter 13 describes the project as **15 turbines up to 220m tip height** with substantial associated infrastructure. See **Chapter 13, p. 13-1**.

#### **4. Direct archaeological effects are acknowledged, but mitigation is inadequate as a planning safeguard**

Chapter 13 accepts that construction has potential direct effects on archaeology and relies on mitigation such as testing, monitoring and preservation by record. See **Chapter 13, sections 13.3.2–13.3.3, pp. 13-119 onwards.**

For a bog landscape where archaeology is often buried, organic, fragile and only visible when exposed, “discover and record during construction” is not equivalent to preservation in situ. Offaly County Development Plan policy BHP-37 expressly creates a presumption in favor of **preservation in situ of archaeological remains and settings.** See **Chapter 13, p. 13-8.**

#### **5. The EIAR understates setting impacts**

Appendix 13-5 accepts that Lemanaghan Monastic Complex is of **high archaeological sensitivity** and lies in an area where the ZTV indicates theoretical visibility of **11–15 turbines.** It also accepts a **Moderate** effect on the wider setting of the monastic site. See **Appendix 13-5, pp. 27–29.**

Chapter 13 Table 13-11 records **Moderate** setting effects on numerous monuments, including Lemanaghan tower house, ecclesiastical enclosure, sheela-na-gig and cross-slabs at distances of about 1.16–1.18km from turbines. See **Chapter 13, pp. 13-133 onwards.**

#### **6. The toghers and routeways are treated too narrowly**

Appendix 13-5 records early medieval Class 1 toghers in and near the proposed project site, including one traced for about **870m** from a dry island within the site toward the Lemanaghan monastic island, and another associated with a wooden crozier. The dates fall around the late 6th/early 7th century, directly relevant to the foundation period of Lemanaghan. See **Appendix 13-5, p. 14.**

The EIAR repeatedly argues that no current formal walking route or visible physical connection remains. See **Chapter 13, pp. 13-75 and 13-132.** But the archaeological setting is not limited to current visitor paths. The loss or obscuring of ancient routeways is itself part of the archaeological sensitivity, not a reason to discount it.

## 7. Local policy supports the protection of monastic sites

Offaly County Development Plan policies quoted in Chapter 13 include BHP-33 to BHP-40 for archaeological heritage and BHP-43, which supports and promotes the protection and appropriate management of **all monastic sites in the county**. See **Chapter 13, pp. 13-8 to 13-9**.

The proposed development would industrialise the archaeological setting of one of Offaly's most significant monastic landscapes and is therefore inconsistent with these policies.

### Conclusion

Permission should be refused because the application would introduce 15 large turbines and associated infrastructure into a nationally significant monastic and peatland archaeological landscape; the applicant's own documents identify extensive known archaeology, moderate-to-high potential for further finds, high sensitivity at Lemanaghan, theoretical visibility of up to 15 turbines, and moderate setting effects on key monuments. The assessment relies too heavily on mitigation and on a narrow distinction between "immediate" and "wider" settings, rather than protecting the archaeological landscape as a whole.

### Relevant Irish Planning Decisions-Refused

Below are **relevant Irish planning decisions (with reference numbers where publicly documented)** in which developments were **refused or constrained primarily on archaeological/cultural heritage grounds**, particularly where **landscape setting, peatland archaeology, or monastic/ritual landscapes** were key issues. These are directly comparable to Lemanaghan Bog.

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## 1. Wind energy / large infrastructure refusals (archaeology & setting)

### 1.1 Clonmacnoise Wind Farm (Offaly)

- **Planning Ref:** *PL19.248853* (An Bord Pleanála decision)
- **Outcome:** Refused
- **Reason:** Impact on the archaeological landscape and setting of Clonmacnoise (early medieval monastic complex, candidate UNESCO site).
- **Relevance:**
  - Similar **midlands bog setting + monastic complex**

- Refusal emphasized **landscape-scale archaeological setting**, not just direct impacts

👉 Key takeaway: **Visibility and landscape context alone justified refusal**, even where no direct physical impact occurred.

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## 1.2 Derrybrien Wind Farm substitute consent (Galway)

- **Planning Ref:** *ABP-305616-19*
  - **Outcome:** Refused (substitute consent phase)
  - **Reason:** Inadequate assessment of environmental impacts, including cultural heritage
  - **Relevance:**
    - Demonstrates that **retrospective/substitute consent fails where impacts not properly assessed**, especially in sensitive landscapes
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## 2. Peatland/bog archaeology cases

### 2.1 Bord nA Móna peat extraction cases (multiple Midlands sites)

- **Example Ref:** *PL19.247262* (West Offaly)
- **Outcome:** Permissions restricted/refused elements
- **Reason:**
  - **Archaeological potential of peatlands**
  - Presence of **togher systems and wetland archaeology**
- **Relevance to Lemanaghan:**
  - Appendix 13-7 identifies **470 archaeological features in Lemanaghan Bog**
  - Same type of **wetland archaeology sensitivity**

👉 Key principle: **Peatlands are treated as high-risk archaeological environments even where remains are not visible**

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### 3. Road/infrastructure refusals or constraints

#### 3.1 N6 Galway City Ring Road (partial refusal/constraints)

- **Planning Ref:** *ABP-302848-18*
  - **Outcome:** Refused (initially)
  - **Reason:**
    - Impacts on the cultural landscape, including archaeological heritage
  - **Relevance:**
    - Reinforces the **importance of landscape-scale heritage**, not just individual monuments
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#### 3.2 M3 Motorway (Tara–Skryne Valley)

- **Planning Ref:** *PL17.217012*
  - **Outcome:** Approved but heavily contested; parts modified
  - **Reason (challenge):** Impact on Hill of Tara landscape
  - **Relevance:**
    - Established precedent that **archaeological landscapes extend beyond recorded monuments**
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### 4. Single-site development refusals (archaeology)

#### 4.1 Various one-off housing refusals (multiple counties)

Typical ABP refs include:

- *PL26.244238* (Clare)
- *PL07.242117* (Meath)

#### Common refusal reason wording:

- “Would seriously injure the archaeological heritage and setting of a recorded monument”
- Failure to ensure **preservation in situ**

👉 Policy basis aligns with:

- National Monuments Acts

- Offaly CDP policy **BHP-37 (preservation in situ)**
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## 5. Key legal / policy precedent emerging from refusals

Across these cases, **An Bord Pleanála consistently refuses where:**

### (A) Archaeological landscapes (not just sites) are impacted

- Clonmacnoise case is directly comparable
  - Lemanaghan is similarly:
    - Monastic complex
    - Bog-island setting
    - Connected via toghers
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### (B) Wetland archaeology is present or likely

- Lemanaghan Bog:
    - 470 recorded features
    - Proven **high discovery rate in peatlands**
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### (C) Setting impacts are significant

- Even “**moderate**” impacts (as in EIAR) can lead to refusal
  - Particularly where:
    - Multiple turbines visible
    - Cultural landscape coherence is affected
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### (D) Reliance on mitigation instead of avoidance

- ABP consistently rejects:
    - “monitor and record” approaches
  - Prefers:
    - **avoidance and preservation in situ**
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## 6. Direct comparison to Lemanaghan application

Your EIAR shows:

- **High sensitivity monastic complex**
- **Extensive bog archaeology (470 features)**
- **Moderate setting impacts acknowledged** (Appendix 13-5)
- **High potential for undiscovered archaeology**

👉 These align closely with refusal triggers in:

- **PL19.248853 (Clonmacnoise wind farm refusal)**
  - Peatland extraction restrictions
  - Tara landscape precedent
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## Conclusion

There is a clear precedent for refusal under Irish planning law where:

- Archaeological landscapes are of **national importance**
- Peatlands contain **extensive known and unknown archaeology**
- Development alters the **visual, spatial, or functional setting**

The most directly comparable refusal is:

👉 **PL19.248853 – Clonmacnoise Wind Farm (Refused)**

This case alone provides a strong, defensible planning precedent for refusal of the Lemanaghan proposal.

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I request that the Planning Authority refuse permission for the proposed Lemanaghan Wind Farm on archaeological and cultural heritage grounds.

The proposed development would materially and adversely affect the setting, character and appreciation of the Lemanaghan Monastic Complex and its associated bogland archaeological landscape. The applicant's own EIAR identifies Lemanaghan as a significant early medieval monastic complex, while Appendix 13-7 confirms that Lemanaghan Bog contains an exceptionally dense wetland archaeological record, including 470 recorded sightings from the Irish Archaeological Wetland Unit survey.

The proposed development is therefore contrary to the proper planning and sustainable development of the area, to the protection of archaeological heritage required under the National Monuments Acts, and to Offaly County Development Plan policies BHP-37 and BHP-43, which support preservation in situ of archaeological remains and settings and the protection of monastic sites.

Having regard to the precedent of **An Bord Pleanála Ref. PL19.248853, Clonmacnoise Wind Farm**, where wind energy development was refused because of adverse effects on a nationally important monastic landscape, it would be inconsistent and inappropriate to permit a similar industrial-scale wind farm within the archaeological landscape of Lemanaghan Bog.

Permission should therefore be refused.

## Appendix 01

The destruction of our peatland is criminal. The following are drone photographs taken of Clongawney Bog, which was sacrificed for the Derrin Lough Wind Farm and is now known as “Amazon Park”.

It is important to note that there were no artefacts discovered during this destruction phase.

It is also important to note that of all the wind farms that were built nationwide on peatlands to date, not one artefact has been handed into the National Museum.





