

Objection to Proposed Lemanaghan Wind Farm (ABP Ref. 324161)

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Date:

To:

An Coimisiún Pleanála
64 Marlborough Street
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Re: Proposed Lemanaghan Wind Farm, Co. Offaly - An Coimisiún Pleanála Case Reference
324161

1. Introduction

I wish to object to the proposed development of 15 wind turbines, a permanent 220 kV on-site substation and associated infrastructure at Lemanaghan and surrounding townlands, Co. Offaly, the subject of An Coimisiún Pleanála case reference 324161.

I am a local resident of Lemanaghan, and my family home is situated at site number 64 in the EIAR [Chapter 5](#). Myself and my family stand in full objection of this proposed wind farm on Lemanaghan Bog, as it not only would destroy the natural rural landscape of Lemanaghan, but it poses huge threat to the great historic value and heritage that the bog and surrounds hold.

My position is clear:

- Permission should be **refused in full**.
- I do not seek any alternative form of development.
- I do **not** seek a reduction in turbine numbers, a change in layout, or a smaller-scale scheme.
- My position is that **no wind turbines are acceptable at this location** having regard to the cultural heritage significance of Lemanaghan, the archaeological sensitivity of the bog landscape, residential amenity concerns and the peat extraction history.

2. Cultural Heritage and Monastic Landscape

2.1 Conservation Plan and Offaly Development Plan

The Heritage Council's [Lemanaghan Conservation Plan](#) (2007) describes Lemanaghan as:

- “A sacred place of great antiquity.”
- “A place rich in documentary history and archaeological potential.”
- “A place where there is a long tradition of devotional practice.”
- “A place ‘apart’, possessing a strong sense of being untouched by the modern world.”

The Conservation Plan (Heritage Council):

The Plan emphasizes that Lemanaghan “retains a sense of peace and tranquility, and is relatively untouched by modern life”. It also states that its policies aim to retain the cultural significance of Lemanaghan and provide a framework for decisions about future infrastructure and land use in its setting.

The [Offaly County Development Plan 2021–2027](#) recognizes the Lemanaghan Conservation Plan and states that Offaly County Council will have regard to it when assessing development proposals affecting Lemanaghan. This gives the Conservation Plan formal weight in the planning process and should be considered and referenced strongly for any planned works in the area.

2.2 Integrated Monastic–Bog Complex

The Conservation Plan explains that the “historic complex at Lemanaghan” comprises, as a single integrated landscape:

- St Managhan’s Church and graveyard.
- St Mella’s Cell and its enclosure.
- The holy well and holy tree.
- The medieval togher linking these sites.
- The former schoolhouse.
- Lemanaghan Castle and adjacent settlement cluster.
- The surrounding bog with its trackways, platforms and archaeological finds.

It concludes that Lemanaghan is of **national archaeological significance** due to the exceptional survival of religious and secular remains, the presence of a wetland trackway network linked to the monastery's operation, and evidence of a long, continuous history of people living and working there for over millennium.

In planning terms, the heritage resource to be considered is therefore the **whole** monastic and bogland landscape, including:

- Its open skyline and uninterrupted horizons.
- The experience of approaching the site across peatland.
- The relationships between church, cell, castle, togher and bog rather than any single monument in isolation.

2.3 Incompatibility of Industrial Turbines with a “place apart”

The proposal would introduce 15 industrial-scale turbines up to approximately 220 m high, with moving blades and aviation lighting, into the immediate wider landscape of this nationally significant monastic complex.

That would transform:

- The skyline behind St Managhan's Church, St Mella's Cell, the holy well and the surrounding graveyard.
- The visual outlook from the old graveyard, from the pilgrim route along the togher, and from the approach roads.
- The perceived remoteness, silence and spiritual isolation which the Conservation Plan identifies as core to Lemanaghan's significance.

The core heritage concern is that it is very difficult to reconcile the Conservation Plan's explicit aim to maintain Lemanaghan as a sacred “place apart”, relatively untouched by modern life, with the industrialization of the surrounding bog by multiple very tall turbines and related grid infrastructure.

Offaly County Council have declared their stance on this project to be one of stern rejection – this has been reported across various [news outlets](#). Independent councillor Sean O'Brien declares Lemanaghan Bog as “an area of immense archaeological and spiritual heritage dating back over 5,000 years, featuring ancient Christian ruins, holy wells, and medieval pathways (Toghers)”, and Fine Gael councillor Hugh Egan strongly recommends project refusal saying “anyone with sense wouldn't even dream of this. It is archaeological vandalism of the highest order”. Gaining this response from our local council has strengthened our own beliefs as local residents that this project needs to be refused on the grounds that it would completely tarnish and destroy the natural and historic value of Lemanaghan Bog and surrounding areas.

3. Archaeology and Lemanaghan Castle

3.1 Wetland archaeology and trackways

The [Conservation Plan](#) records that archaeological remains in the Lemanaghan bogs date back over 5,500 years and that there is an “exceptional number of archaeological find sites”, particularly trackways and wooden platforms, many dated to late medieval and early modern periods.

It notes that the greatest concentration of track construction coincides with the foundation of the monastery, demonstrating that the bog trackway network is part of the monastic infrastructure, and that the monastery relied on this network for movement and connection to other sacred sites, including Clonmacnoise.

The Plan concludes that Lemanaghan’s wetland archaeology is of **national importance** and includes detailed mapping of trackways in surrounding bogs such as Derrynagun, Tumbleagh and Corhill.

The wind farm proposal would involve:

- New turbine foundations and crane hardstands.
- Extensive permanent access roads and drainage.
- Underground cabling and overhead line works in and around this bog complex.

The EIAR also illustrates this wealth of archaeological findings in Lemanaghan. [Chapter 13 - Cultural Heritage](#) records 470 separate discoveries in the area including the bog and its surrounds. A vast number of these (Surveyed in Appendix_13_7 of the EIAR) are toghers, all a part of the network of trackways that were crucial to the monastic settlement.

Even if individual features are avoided on plans, the density and significance of wetland archaeology described in the Conservation Plan mean that large-scale ground disturbance across the bog carries a real risk to known and unknown archaeological remains. To re-quote representatives of Offaly Council, allowing such works to progress would indeed be “archaeological vandalism of the highest order”. Given the acknowledged national importance of these wetland remains, a precautionary approach is required. The available evidence does not demonstrate beyond reasonable doubt that the proposed development can proceed without causing permanent damage to this uniquely rich archaeological resource.

3.2 St Mella's Cell

The Conservation Plan highlights St Mella's Cell as the only unaltered early Christian oratory of its type in County Offaly, enclosed by an "exceptional" rectangular stone-faced bank and with no evidence of later burial inside the enclosure, which is unusual and adds to the site's importance.

The togher and the walking route between the church, the holy well and St Mella's Cell are an integral part of how the monastic landscape is experienced. Any significant alteration to the wider setting and approach routes risks diminishing this historic and devotional route.

Recent storm damage has also revealed previously undiscovered human remains at St Mella's Cell, which have been reported as early medieval in date, reinforcing the ongoing archaeological sensitivity of the site. This discovery underlines the need for a highly cautious, avoidance-led approach to any works in the surrounding bog and approach routes.

3.3 Lemanaghan Castle

The Conservation Plan records that Lemanaghan Castle was already in existence by 1620, when it was described by Sir Piers de Renzi. It was known to be place where the English translation of the *Annals of Clonmacnoise* was carried out in 1627. Lemanaghan Castle survives today as an important ruin adjacent to the historic settlement cluster at the schoolhouse.

Although it was largely demolished in 1959, the surviving remains and associated settlement cluster are part of the historic complex and should be treated as such. This historic landmark is just 500m from the boundary of Lemanaghan Bog.

The proposed wind turbines would completely destroy the skyline and visibility between the castle, church, graveyard and bog. It would also undermine the Conservation Plan's objective of protecting the overall historic landscape.



Lemanaghan Castle Remains



St. Mella's Cell

4. Residential Amenity, Shadow Flicker and Noise

The EIAR's Population and Human Health and shadow flicker assessments (as described on the planning website) acknowledge that a number of dwellings within the shadow flicker study area are predicted to experience shadow flicker at or above guideline thresholds, and propose operational mitigation measures such as turbine shut-down algorithms and, at building level, measures like curtains or blinds for affected rooms.

From a planning perspective:

- Dependence on operational controls and residents closing blinds or curtains is not equivalent to designing a scheme that avoids nuisance impacts in the first place.
- The Draft Revised Wind Energy Development Guidelines (2019), while not yet finalised, state that planning permissions should include conditions to ensure no shadow flicker at any existing dwelling, with automatic turbine shut-down where necessary.

Noise is assessed using target noise limits in the EIAR. Concerns arise where the surrounding area is currently a low-noise rural bogland environment, which makes new repetitive or tonal noise more noticeable, and where the EIAR adopts higher noise limits that may not reflect the quietness of the local environment.

In a landscape valued for its peace and absence of industrial noise, there is a significant planning concern that the introduction of 15 large turbines operating day and night would diminish the sense of rural tranquility.

5. Hydrology, Peat Extraction and Substitute Consent

An Coimisiún Pleanála case [SU19.323676](#) concerns a Substitute Consent application by Bord na Móna Energy Limited for peat extraction and ancillary works at Lemanaghan Bog, supported by a remedial EIAR and remedial NIS.

This is an official recognition that past peat extraction at Lemanaghan required environmental assessment and a legal review process.

The main planning and environmental concerns for the wind farm are:

- The current condition of the bog and its drainage system is largely the result of industrial peat extraction, not a natural landscape.
- The wind farm EIAR should therefore assess impacts in the context of a bog that has already been heavily altered and is currently subject to a separate environmental review process. It should not simply assume the existing damaged condition is acceptable as a baseline.

- There is also a question as to whether it is appropriate to permit major new infrastructure on lands where the environmental acceptability and legal status of previous peat extraction activities are still being examined through the substitute consent process.

These concerns do not, on their own, prove that past peat extraction was unlawful. That issue will be decided through the substitute consent process and, if necessary, by the courts. However, the public record shows that Bord na Móna has considered it necessary to apply for substitute consent for peat extraction at Lemanaghan Bog. This is directly relevant to the wind farm proposal because the present condition, drainage, and stability of the bog have all been shaped by the extraction activities that are now under review.

In that context, it is reasonable to question whether a wind farm of this scale is compatible with national peatland protection and restoration policies, particularly in an area already recognised as both archaeologically and environmentally sensitive.

6. Conclusion

Beyond the technical planning and environmental concerns outlined above, this proposal would also have a very significant personal impact on my family and on the character of Lemanaghan. The proposed turbines and associated infrastructure would be located extremely close to my family home in what has long been a quiet rural landscape valued for its peace, natural beauty and wealth of heritage.

Lemanaghan is a living rural and historic landscape that forms part of the daily lives of the people who live here. The quiet nature of the boglands, the absence of major industrial development, and the strong connection between the surrounding heritage and community are central to the character of the area.

The scale of the proposed wind farm would fundamentally alter that environment. While renewable energy development is important, it should not come at the cost of permanently damaging an already sensitive historic bog landscape or undermining the quality of life of families who live within it.

For these reasons, I respectfully submit that the proposed development would be contrary to the proper planning and sustainable development of the area, and that permission should be **refused in full**.

I do not seek any reduction in the number, height or layout of turbines as an alternative. My position is that **no wind turbines should be permitted at Lemanaghan**.

Yours faithfully,

(Signature)

John Corcoran