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26 May 2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: PAX19.324161 – Proposed Lemanaghan Wind Farm Development

Dear Sir/Madam,

Please find enclosed my observation in relation to the proposed Lemanaghan Wind Farm development under Case Reference PAX19.324161.

This submission raises concerns regarding the cumulative environmental and infrastructural intensification of peatland landscapes within County Offaly and the wider Midlands region. In particular, the observation addresses issues relating to cumulative industrialisation, peatland rehabilitation and hydrological recovery, ecological sensitivity, landscape transformation, alternatives assessment, grid infrastructure concentration, and the long-term sustainability of continued industrial-scale development within recovering peatland environments.

The submission also examines the interaction between the proposed development and the wider substitute consent, rehabilitation and environmental management framework associated with historic peat extraction activities at Lemanaghan Bog and surrounding peatland areas.

It is respectfully submitted that the proposed development should be assessed not in isolation, but within the broader cumulative context of decades of industrial peat extraction, ongoing rehabilitation obligations, increasing infrastructure concentration, and the evolving environmental condition of the wider peatland landscape.

I respectfully request that the matters raised within the enclosed observation be fully considered during assessment of the proposed development and accompanying Environmental Impact Assessment Report.

Yours faithfully,

Laura Dunne

Observation to An Coimisiún Pleanála

Re: PAX19.324161 – Proposed Lemanaghan Wind Farm Development

Lemanaghan and Surrounding Townlands, Co. Offaly

Introduction

This submission concerns the proposed Lemanaghan Wind Farm development under Case Reference PAX19.324161. While the importance of renewable energy transition is fully acknowledged, serious concerns arise regarding the suitability of this particular peatland landscape for the continued concentration of industrial-scale energy infrastructure.

The central issue arising throughout the Environmental Impact Assessment Report ("EIAR") is not whether renewable energy development should occur in principle, but whether the cumulative environmental burden already imposed upon the Offaly peatland landscape has now reached a point where further intensification risks conflicting with long-term ecological rehabilitation, hydrological recovery, landscape protection and sustainable land-use objectives.

The receiving environment is not an undeveloped landscape. It is a landscape already fundamentally altered through decades of industrial peat extraction, drainage, engineered hydrological intervention and associated infrastructural development. The applicant's own documentation repeatedly relies upon this historic industrialisation as justification for further development. However, the same documentation simultaneously acknowledges:

- ongoing rehabilitation obligations;
- hydrological sensitivity;
- peat stability concerns;
- designated-site connectivity;
- extensive drainage management requirements;
- ecological uncertainty;
- and long-term environmental recovery objectives.

In those circumstances, significant questions arise regarding whether the proposed development represents a proportionate, environmentally coherent and sustainable continuation of land-use policy within a recovering peatland environment.

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1. The Existing Industrial Burden on the Offaly Peatland Landscape

The EIAR repeatedly acknowledges that the wider Offaly peatland landscape has already undergone substantial industrial alteration arising from peat extraction and associated energy infrastructure.

Chapter 14 states:

“The peatlands in which the site is located form part of a larger rural working landscape setting which has undergone substantial degree of modification through peat extraction and agriculture.”

The same chapter further describes the landscape as:

“a flat landscape of degraded cutover peatland.”

Similarly, Chapter 3 refers to Bord na Móna lands as:

“Industrial brownfield sites suitable for redevelopment.”

These statements are highly significant because they demonstrate that the justification for the proposed development is substantially dependent upon the argument that the receiving environment has already been industrially modified.

However, historic industrialisation cannot automatically justify indefinite further industrialisation.

County Offaly has already experienced decades of:

- industrial peat extraction;
- drainage and hydrological alteration;
- transmission infrastructure development;
- substations;
- wind farms;
- battery storage proposals;
- road upgrades;
- spoil storage;
- and associated enabling infrastructure.

The wider county already contains significant renewable energy infrastructure including:

- Mount Lucas Wind Farm;
- Cloncreen Wind Farm;
- Yellow River Wind Farm;

- Cushaling Wind Farm;
- Cloncant Wind Farm;
- and multiple additional renewable energy projects identified throughout the EIAR.

The applicant's own documentation also identifies multiple additional Bord na Móna peatland areas as suitable for future renewable energy development.

This cumulative context is critically important.

The Environmental Impact Assessment Directive 2011/92/EU, as amended by Directive 2014/52/EU, requires assessment not merely of direct project effects, but also of cumulative interaction with the wider receiving environment.

In Holohan v An Bord Pleanála (Case C-461/17), the Court of Justice emphasised the importance of assessing cumulative environmental interaction within the broader receiving landscape.

The issue therefore arising is whether the continuing concentration of nationally significant energy infrastructure within the same peatland region has now resulted in a disproportionate cumulative environmental and infrastructural burden upon the receiving environment and surrounding rural communities.

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2. Retrospective Industrial Damage and the Substitute Consent Context

The proposed development cannot be separated from the wider substitute consent and rehabilitation framework associated with historic peat extraction at Lemanaghan Bog under Case Reference SU19.323676.

The remedial Environmental Impact Assessment Report ("rEIAR") submitted under that process confirms that:

"bog drainage works began in 1950 followed by the commencement of peat extraction in 1960."

The substitute consent documentation further confirms that industrial-scale peat extraction occurred from:

"1988 to June 2020."

The hydrological assessment within the rEIAR states that:

"The cumulative effects of the Peat Extraction Phase (July 1988 – June 2020) and the peat extraction and site preparation works which preceded 1988 would have had a profound

negative effect on the bog hydrogeological regime whereby vegetation was cleared, drainage inserted, and peat extracted from much of the Application Site."

This is an important admission.

The receiving environment has already experienced acknowledged long-term hydrological and ecological damage arising from decades of industrial extraction.

The substitute consent documentation also expressly acknowledges limitations associated with retrospective environmental assessment:

"The retrospective assessment has been limited by the availability, completeness, accuracy and accessibility of historical baseline environmental data."

This creates an inherent difficulty in accurately reconstructing baseline ecological and hydrological conditions.

In Commission v Ireland (Case C-215/06), the Court of Justice emphasised that retrospective environmental assessment cannot fully remedy the absence of prior assessment.

Similarly, in Sweetman v An Bord Pleanála [2017] IESC 46, the Irish Supreme Court confirmed that substitute consent is intended only for exceptional circumstances.

In practical terms, the consequence is that the receiving environment has already undergone decades of ecological and hydrological alteration before lawful environmental assessment processes were fully completed.

This raises serious questions regarding the degree of scientific certainty that can realistically be attached to predictions concerning additional cumulative impacts within the same peatland system.

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3. Rehabilitation Objectives and Conflict with Further Industrialisation

The substitute consent documentation confirms that the site is now subject to ongoing rehabilitation, environmental stabilisation and hydrological recovery obligations.

The rEIAR states:

"Peat extraction ceased at the Application Site in June 2020, and decommissioning activities as required by Condition 10 of the IPC Licence are currently ongoing. Subsequent to the completion of decommissioning activities, rehabilitation works will commence at the Application Site."

The IPC Licence further requires:

“a fully detailed and costed plan for permanent rehabilitation of the cutaway boglands.”

The Peatlands Climate Action Scheme (“PCAS”) states:

“The general objective of peatland rehabilitation is to ensure environmental stabilisation of the former industrial peat production areas.”

PCAS further emphasises:

“optimising suitable hydrological conditions (stable water levels close to the surface).”

The substitute consent documentation additionally states that rehabilitation objectives are intended to place the site:

“on a trajectory towards becoming a naturally functioning peatland.”

At the same time, the proposed development seeks to introduce:

- 15 turbines up to 220 metres in height;
- extensive new road infrastructure;
- drainage systems;
- hardstanding areas;
- excavation works;
- borrow pits;
- substations;
- underground cabling;
- overhead line infrastructure;
- and peat/spoil management operations.

A significant tension therefore clearly arises between:

- rehabilitation;
- rewetting;
- hydrological recovery;
- ecological stabilisation;
- and continued industrial-scale infrastructural intensification.

The question is not whether mitigation measures are proposed.

Rather, the issue is whether a landscape simultaneously identified as requiring:

- hydrological stabilisation;
- rehabilitation;
- aftercare;
- environmental management;
- and ecological recovery

can realistically be regarded as an environmentally appropriate location for continued industrial-scale infrastructure concentration.

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4. Hydrology, Drainage and Scientific Uncertainty

The EIAR repeatedly acknowledges the hydrological sensitivity and complexity of the receiving environment.

Chapter 9 confirms that:

“Due to the historic industrial peat extraction activities at the Proposed Project site, the site has been artificially drained in order to lower the peat water table.”

The site is described as containing:

“a network of field drains typically spaced at 15 to 20m intervals, piped drains, main drains, headland drains, and silt ponds.”

The EIAR further identifies:

- excavation dewatering;
- groundwater interaction;
- drainage management;
- hydrologically connected designated sites;
- Water Framework Directive considerations;
- and interaction with existing bog drainage networks.

The extent of hydrological mitigation and engineering proposed throughout the EIAR itself demonstrates that the site remains hydrologically sensitive notwithstanding its industrial history.

At the same time, the substitute consent documentation acknowledges that original baseline conditions cannot now be fully reconstructed because of decades of prior industrial disturbance.

In those circumstances, concern necessarily arises regarding whether sufficient scientific certainty exists concerning:

- long-term cumulative hydrological interaction;
- peatland recovery trajectories;
- groundwater interaction;
- peat stability;
- and ecological rehabilitation.

This concern becomes particularly significant given that peatland systems function through complex hydrological interaction across broad landscape areas.

The proposed development therefore cannot reasonably be viewed as a purely isolated engineering intervention.

Rather, it represents additional long-term engineered intervention within a peatland system already acknowledged as hydrologically altered, environmentally sensitive and subject to rehabilitation obligations.

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5. Alternatives Assessment

Article 5(1)(d) and Annex IV of Directive 2011/92/EU require:

“a description of the reasonable alternatives studied by the developer”

including comparison of:

“project design, technology, location, size and scale.”

While the EIAR refers extensively to alternatives assessment, significant questions arise regarding whether the assessment was genuinely broad, environmentally focused and comparative.

The EIAR expressly confirms that the site selection exercise was confined to Bord na Móna lands:

“BnM conducted a technical review of lands which are either cut away or cutover.”

This indicates that the assessment was substantially constrained from the outset to lands already within Bord na Móna ownership and control.

The methodology repeatedly prioritises:

- grid access;
- engineering feasibility;
- commercial viability;
- project economics;
- infrastructure availability;
- and low population density.

The EIAR also states:

“The Applicant sought to identify an area with a relatively low population density.”

While such factors may influence commercial deliverability, they do not remove the obligation to comparatively assess environmentally preferable alternatives.

The EIAR provides limited transparent side-by-side environmental comparison between:

- alternative locations;
- lower-height alternatives;
- reduced-scale alternatives;
- or non-peatland alternatives.

The same document simultaneously acknowledges:

- peat stability risks;
- hydrological interaction;
- designated-site connectivity;
- drainage complexity;
- ecological interaction;
- and rehabilitation pressures.

Concern therefore arises that environmental sensitivity may not have been afforded sufficient weighting within the alternatives process when compared to commercial and infrastructural convenience.

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6. Peatland Ecology and Habitat Fragmentation

The EIAR repeatedly acknowledges the ecological complexity and interconnected nature of the peatland environment.

Chapter 17 states:

“The result of interactive effects may exacerbate the magnitude of the effects or ameliorate them or have a neutral effect.”

The biodiversity chapters identify:

- hydrologically connected habitats;
- designated sites;
- habitat corridors;
- peatland ecosystem interaction;
- and cumulative ecological pressures.

The EIAR further acknowledges reliance upon:

- mitigation;

- monitoring;
- adaptive management;
- predictive modelling;
- and long-term environmental controls.

Concern arises where a development depends heavily upon future mitigation and adaptive management in circumstances where:

- baseline certainty is already constrained;
- hydrological systems remain altered;
- rehabilitation is ongoing;
- and long-term cumulative interaction remains inherently difficult to predict.

The proposed development would introduce:

- roads;
- drainage corridors;
- hardstanding;
- excavation works;
- turbine bases;
- cabling;
- and associated infrastructure

across a broad peatland landscape.

The cumulative interaction between:

- hydrology;
- habitat fragmentation;
- peat stability;
- drainage;
- ecological connectivity;
- and long-term rehabilitation

therefore requires particularly cautious assessment.

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7. Landscape Transformation and Cultural Impact

The proposed development would introduce turbines up to 220 metres in height across a historically open peatland landscape.

The issue is not solely visibility.

Rather, concern arises regarding the long-term cumulative transformation of the wider landscape into an increasingly concentrated energy infrastructure environment.

The EIAR repeatedly characterises the landscape as industrialised and of lower sensitivity.

However, the same landscape also contains:

- recognised heritage features;
- monastic landscapes;
- rural communities;
- archaeological sensitivity;
- designed landscapes;
- and longstanding cultural associations.

Particular concern arises regarding cumulative effects upon:

- the wider Lemanaghan monastic landscape;
- Bellair House and its designed landscape;
- the River Shannon corridor;
- and the wider cultural identity of the peatland environment.

Protected structures derive significance not merely from buildings themselves, but from their wider landscape setting and visual relationship with the surrounding environment.

Questions therefore arise regarding whether the cumulative industrialisation of the wider peatland landscape has now reached a scale where the historic and cultural character of the receiving environment risks becoming progressively subordinated to energy infrastructure.

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8. Grid Infrastructure and Strategic Efficiency

The proposed development is intrinsically dependent upon substantial grid infrastructure.

The EIAR confirms the requirement for:

- a permanent 220kV substation;
- overhead line infrastructure;
- and connection into the Shannonbridge–Maynooth 220kV transmission line.

The issue arising is not merely the direct effects of the turbines themselves, but the cumulative concentration of transmission and energy infrastructure across the wider Midlands peatland landscape.

Questions arise regarding:

- future grid reinforcement pressures;
- continued infrastructure escalation;
- cumulative substations and transmission expansion;
- strategic transmission efficiency;
- and long-term concentration of nationally significant energy infrastructure within the same region.

This concern is reinforced by the fact that County Offaly already contains a substantial concentration of energy-related infrastructure and continues to form a significant component of Ireland's renewable energy pipeline.

Accordingly, concern arises regarding whether the continuing concentration of infrastructure within the same receiving landscape represents the most environmentally balanced and strategically proportionate long-term planning approach.

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9. Environmental Justice and Rural Communities

The EIAR repeatedly relies upon low population density as a factor supporting site suitability.

It states:

"The number of receptors experiencing these effects is very low as the landscape surrounding the proposed turbines has a low population density."

This raises broader concerns regarding environmental justice and the disproportionate concentration of nationally significant infrastructure within sparsely populated rural peatland communities.

The relatively lower number of residential receptors identified within standard planning assessments does not reduce the significance of:

- cumulative landscape burden;
- community impact;
- cultural disruption;
- environmental transformation;
- or long-term changes to sense of place.

County Offaly and the wider Midlands have already carried significant national industrial and energy burdens for decades.

Questions therefore arise regarding whether rural peatland communities are increasingly being viewed as suitable locations for cumulative infrastructure concentration precisely because of:

- historic industrialisation;
- lower population density;
- existing grid infrastructure;
- and modified landscape character.

The Aarhus Convention emphasises the importance of meaningful environmental participation and environmental justice.

In this context, assessment of the proposed development should not be reduced solely to numerical receptor analysis, but must also consider the wider cumulative burden placed upon rural landscapes and communities over time.

Conclusion

The principal concern arising from the proposed development is cumulative intensification.

The receiving environment has already undergone:

- decades of industrial peat extraction;
- hydrological alteration;
- drainage intervention;
- ecological disturbance;
- landscape industrialisation;
- and associated infrastructural transformation.

At the same time, the substitute consent and rehabilitation framework now identifies the same landscape as requiring:

- rehabilitation;
- environmental stabilisation;
- rewetting;
- hydrological recovery;
- biodiversity restoration;
- and long-term ecological management.

The proposed development would introduce substantial additional industrial-scale infrastructure into this already heavily altered and environmentally sensitive peatland system.

While mitigation measures and environmental controls are proposed throughout the EIAR, the documentation simultaneously acknowledges:

- retrospective assessment limitations;

- hydrological complexity;
- peat stability concerns;
- ecological interaction;
- cumulative environmental pressures;
- and long-term uncertainty.

Accordingly, serious concern remains regarding whether sufficient scientific certainty exists concerning the long-term cumulative environmental consequences of continued industrial-scale infrastructural intensification within this rehabilitating peatland landscape.

The issue is therefore not renewable energy in principle.

Rather, it is whether the continuing concentration of nationally significant industrial and energy infrastructure within the same recovering peatland landscapes is compatible with:

- sustainable land-use planning;
- environmental protection;
- ecological recovery;
- hydrological stabilisation;
- landscape protection;
- and the long-term interests of affected rural communities.

In light of the matters outlined above, it is respectfully submitted that the proposed development gives rise to significant unresolved concerns regarding cumulative environmental effects, rehabilitation compatibility, hydrological uncertainty, landscape transformation and long-term sustainable planning within the wider Midlands peatland environment.