

Objection to Proposed Lemanaghan Wind Farm Development, County Offaly

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Ireland

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Case Number 324161

To: An Coimisiún Pleanála

Re: Proposed Lemanaghan Wind Farm Development

Applicant: Bord na Móna and SSE Renewables

Dear Sir/Madam,

I wish to formally object to the proposed Lemanaghan Wind Farm development on Lemanaghan Bog, County Offaly.

Having reviewed the publicly available planning application, EIAR documentation and Natura Impact Statement submitted by the applicant, I have serious concerns regarding the long-term environmental consequences of this proposal, particularly in relation to peatland destruction, biodiversity loss, impacts on protected bird species, unresolved historic peat extraction issues, landscape degradation, archaeological impacts and the inadequacy of the proposed remediation measures.

The proposed development would represent a significant industrialisation of an environmentally and culturally sensitive peatland landscape and would result in irreversible impacts that cannot be fully mitigated or restored.

1. Industrialisation and Permanent Damage to Lemanaghan Bog

The application proposes a substantial industrial-scale wind energy development across a sensitive peatland environment, including:

- 15 turbines with blade tip heights of up to 220 metres;
- Approximately 17.1 km of new internal roads;
- Upgrading of existing bog roads;
- Crane hardstands;
- Extensive underground cabling;
- Large reinforced concrete turbine foundations;
- A 220kV substation compound and associated infrastructure.

The applicant states that approximately 5% of the 1,200-hectare bog will be directly occupied by infrastructure. However, this significantly understates the true ecological impact of fragmenting an interconnected peatland hydrological system.

Peatlands are highly sensitive living ecosystems whose ecological function depends upon intact hydrology across the wider bog body. Roads, drainage channels, excavations and concrete foundations interrupt water movement, dry surrounding peat and fundamentally alter the functioning of the bog well beyond the immediate construction footprint.

This proposal would permanently industrialise a substantial section of Lemanaghan Bog.

A further matter of serious concern is that the applicant, Bord na Móna, appears to be progressing this proposed wind energy development notwithstanding unresolved and contentious substitute consent matters associated with historic peat extraction activities across the wider bog landscape.

It is a matter of public record that historic peat extraction activities on Bord na Móna bogs have been subject to substitute consent processes arising from previous extraction undertaken without the benefit of full environmental assessment and planning consent in accordance with evolving European environmental law requirements.

In this context, it is difficult to reconcile the advancement of a major new industrial wind energy proposal with the fact that historic environmental legacy issues relating to peat extraction and habitat degradation remain contentious and, in environmental terms, not fully resolved.

From a planning perspective, this raises significant concerns regarding:

- The cumulative environmental burden already imposed on the bog;
- The extent to which baseline ecological conditions have already been materially altered by historic industrial activity;
- Whether the receiving environment has already experienced significant anthropogenic degradation;
- Whether it is appropriate to permit further industrialisation of the site before historic environmental liabilities and restoration obligations have been conclusively addressed;
- Whether a robust cumulative impact assessment can genuinely be undertaken where historic extraction impacts and substitute consent matters remain unresolved.

The planning authority must consider not only the direct impacts of the proposed development itself, but also the wider context of environmental compliance, restoration commitments and cumulative ecological degradation across the bog landscape.

The proposal would introduce substantial permanent infrastructure, including extensive reinforced concrete turbine foundations, crane pads and road networks, into

a peatland system already heavily modified through decades of industrial extraction activity.

The applicant appears to place considerable reliance on future restoration and mitigation measures while simultaneously seeking permission for further industrialisation of the bog before historic substitute consent and peatland rehabilitation issues have been satisfactorily resolved.

This creates a significant concern that the development is effectively proceeding “at risk” from an environmental and planning compliance perspective.

Given the acknowledged ecological sensitivity of peatlands, together with national policy objectives relating to peatland rehabilitation, biodiversity recovery and carbon sequestration, a far more precautionary and sequential approach should apply.

In addition to its ecological importance, Lemanaghan Bog possesses exceptional archaeological and cultural heritage significance.

The wider Lemanaghan peatland complex has been recognised as an area of major archaeological importance containing an extensive concentration of preserved wetland archaeology dating from the Neolithic period through to the medieval era.

Archaeological investigations within the bog have uncovered trackways, wooden structures, artefacts, ecclesiastical objects and human remains preserved within the peat environment over thousands of years.

The applicant’s own Cultural Heritage assessment acknowledges that the Lemanaghan bogs contain numerous archaeological sites and stray finds spanning from the Neolithic to the late medieval period and identifies moderate to high potential for additional buried archaeological features and organically preserved remains within the peat substrate.

Particularly significant discoveries associated with the area include the internationally important Lemanaghan Crozier and extensive preserved wooden trackways crossing the bog landscape. The archaeological importance of Irish peatlands, including Lemanaghan, is widely recognised due to the exceptional preservation conditions provided by waterlogged peat environments.

Lemanaghan has been recognised by archaeological specialists as one of the most significant wetland archaeological landscapes in Ireland and within western Europe due to the concentration and preservation of archaeological material within the peatland environment.

This archaeological resource is fundamentally dependent on stable peatland hydrology and undisturbed anaerobic conditions. Excavation, drainage, road construction and extensive ground disturbance associated with the proposed development create significant risk not only to known archaeological assets, but also to previously unidentified buried archaeological material preserved within the bog.

The industrialisation of this landscape through turbines of up to 220 metres in height, extensive road infrastructure and large-scale excavation would fundamentally alter the

historic character, setting and archaeological integrity of the Lemanaghan bog landscape.

One of the most concerning aspects of the proposal relates to the long-term decommissioning and restoration strategy. The EIAR documentation indicates that substantial reinforced concrete turbine foundations may remain in situ following decommissioning and simply be covered over and allowed to revegetate naturally.

This cannot reasonably be characterised as genuine peatland restoration.

The proposal effectively allows thousands of tonnes of reinforced concrete and associated engineered materials to remain permanently embedded within the peat substrate. This would permanently sterilise sections of the bog and prevent the full restoration of natural peat-forming processes.

A peatland ecosystem cannot be considered restored where extensive concrete infrastructure remains buried indefinitely beneath the bog surface.

This raises major concerns regarding:

- Permanent hydrological disruption;
- Long-term habitat fragmentation;
- Prevention of future peat accumulation and peat-forming function;
- Long-term loss of carbon sequestration capacity;
- Creation of a permanent industrial legacy within a sensitive peatland environment.

The applicant has not demonstrated how the ecological integrity of the bog could genuinely recover while substantial concrete foundations and associated hard infrastructure remain permanently embedded within the peatland system.

In the absence of certainty regarding the long-term resolution of historic environmental impacts associated with peat extraction, there is a serious risk that this proposal would compound legacy ecological damage rather than contribute to meaningful peatland restoration objectives.

2. Impacts on Protected and Red-Listed Bird Species

The planning documentation identifies a substantial number of sensitive ornithological receptors within the study area.

Species identified within the EIAR documentation include:

- Hen Harrier
- Whooper Swan
- Common Crane
- Merlin
- Peregrine Falcon
- Lapwing
- Golden Plover
- Barn Owl

- Snipe
- Woodcock
- Osprey

Many of these species are red-listed or amber-listed Birds of Conservation Concern in Ireland.

The presence of species such as Hen Harrier, Merlin and Peregrine Falcon is particularly concerning given the known collision risks associated with modern large-scale turbines.

The proposed turbines are exceptionally large at 220 metres tip height and operate within flight zones used by raptors and migratory species.

The application relies heavily on collision risk modelling and mitigation assumptions; however, such models contain recognised limitations and uncertainty, particularly regarding:

- Large turbine dimensions;
- Cumulative effects;
- Behavioural displacement;
- Nocturnal movement;
- Weather variability;
- Long-term operational impacts.

The documentation also acknowledges the need for ongoing carcass searches and operational bird monitoring, which itself demonstrates that mortality risk remains a recognised concern.

Even where direct collision mortality does not occur, the development is likely to result in habitat displacement effects. Species such as Hen Harrier are known to avoid disturbed landscapes and turbine-dominated environments, resulting in the effective loss of otherwise suitable feeding and breeding habitat.

The bog currently provides open habitat that is increasingly rare within Ireland. The fragmentation of this landscape through roads, hardstands, lighting and tall rotating structures would fundamentally alter the ecological character of the area.

3. Contradiction Between Climate Policy and Peatland Destruction

The proposal presents a significant contradiction in national environmental and climate policy.

Peatlands are internationally recognised carbon sinks and are critical for climate regulation, biodiversity protection and water management.

Yet this development would involve:

- Excavation of peat;
- Disturbance of peat hydrology;
- Installation of extensive concrete infrastructure;
- Long-term industrialisation of a carbon-rich landscape.

The State is simultaneously funding peatland rehabilitation and restoration initiatives while permitting industrial-scale infrastructure within sensitive peatland environments.

The carbon costs associated with peat excavation, habitat degradation and long-term hydrological disturbance must be fully and transparently assessed.

4. Landscape and Cultural Heritage Impacts

The proposed 220-metre turbines would dominate the landscape across a wide area of County Offaly.

Lemanaghan Bog possesses ecological, archaeological and cultural significance that derives directly from the openness and integrity of the peatland landscape.

The cumulative visual impact of:

- Turbines of unprecedented scale;
- Aviation lighting;
- Crane pads;
- Internal road networks;
- Substations;
- Associated transmission infrastructure

would fundamentally alter the character of the area from peatland landscape to industrial energy infrastructure.

This impact cannot reasonably be characterised as temporary given the scale of the works and the permanent infrastructure proposed to remain within the bog.

The proposal would not only impact biodiversity and peatland ecology, but would also industrialise a nationally and internationally significant wetland archaeological landscape whose value derives directly from the integrity of the peatland environment itself.

5. Inadequate Precautionary Approach

The Natura Impact Statement concludes that mitigation measures will prevent adverse effects on European sites. However, given:

- The ecological sensitivity of peatland habitats;
- The number of protected bird species recorded;
- The scale of the turbines proposed;
- The archaeological significance of the landscape;
- The unresolved legacy of historic peat extraction;
- And the permanent nature of the infrastructure proposed,

a significantly more precautionary approach is warranted.

Where scientific uncertainty exists regarding impacts on protected habitats, peatland hydrology, archaeology and species conservation, the precautionary principle should prevail.

6. Conclusion

This proposal would result in:

- Permanent industrialisation of a sensitive peatland landscape;
- Long-term hydrological disruption;
- Permanent burial of reinforced concrete foundations within the bog;
- Significant impacts on protected and red-listed bird species;
- Landscape degradation;
- Potential impacts on internationally significant wetland archaeology;
- Compounding of historic environmental degradation associated with peat extraction;
- Long-term loss of ecological integrity and carbon sequestration function.

While renewable energy development is necessary, not every location is suitable for industrial-scale wind energy infrastructure.

Lemanaghan Bog is an environmentally, archaeologically and culturally sensitive peatland landscape of national and international significance that should be prioritised for restoration, conservation and protection rather than further industrialisation.

For the reasons outlined above, I respectfully request that permission for the proposed Lemanaghan Wind Farm development be refused.

Yours faithfully,

Rachael Scanlon
Concerned Citizen