

Cathes

Derek Kelly

From: Noleen Hamilton <noleenhamilton@gmail.com>
Sent: Wednesday 5 November 2025 13:52
To: Appeals2; noleenhamilton@gmail.com
Subject: Observer Details - Case Ref SU19.323676
Attachments: BNM Submission Nov 2025.pdf

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Observer Details-Case Ref SU19.323676

Name: Noeleen Hamilton
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Email: noeleenhamilton@gmail.com
Date: 04th November 2025

Application Details

Applicant: Bord na Móna Energy Limited
Case Reference: SU19.323676
Type: Substitute Consent under Section 177E, Planning and Development Act 2000 (as amended)
Location: Lemanaghan Bog located in the townlands of Cooldorrageh, Kilnagarnagh, Cappanalosset, Tumbeagh, Killaghintoher, Castlearmstrong, Leabeg, Cornafurris and Corrabeg, Lemanaghan, Kilnagoolney, Straduff, Lisdermot, Derrica More, Rosfaraghan, Rashinagh, Cor Mor and Cor Beg, and Corbane, Co Offaly.

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Dear Sir/madam,

I, Noeleen Hamilton, of the above address, wish to make this submission/observation on the above Substitute Consent application.

Please acknowledge receipt of this submission and keep me informed, on the above email, of any further stages in the process.

I understand that no fee applies to submissions on substitute consent applications (per S.I. No.648 of 2023)

Yours faithfully

Noeleen Hamilton

Email: noeleenhamilton@gmail.com

Objection to BNM Destroying Irelands Natural Carbon Sink

1. Bogs are Carbon Sinks

- **Peatlands (bogs)** cover about **20% of Ireland's land area**, which is one of the highest proportions in Europe.
 - Despite their relatively small global area (only about **3% of Earth's land surface**), peatlands **store more carbon than all the world's forests combined** — roughly **30% of global soil carbon**.
 - This is because peat forms from **partially decomposed plant material** in waterlogged, oxygen-poor conditions. The lack of oxygen slows decay, trapping the carbon in layers of peat that build up over thousands of years.
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2. Ireland's Carbon Reservoir

- Irish bogs are estimated to store **over 1.5 billion tonnes of carbon**.
 - Most of this carbon is locked underground in **raised bogs and blanket bogs**, which have been accumulating peat since the last Ice Age (around 10,000 years ago).
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3. Threats and Carbon Emissions

- **Draining, cutting, or burning bogs** turns them from carbon sinks into carbon sources.
 - When peat is exposed to air (through drainage for turf-cutting, agriculture, or forestry), it **oxidises**, releasing **CO₂ and other greenhouse gases**.
 - It's estimated that **drained peatlands contribute up to 10 million tonnes of CO₂ equivalent per year** in Ireland — a substantial share of national emissions.
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4. Restoration and Climate Action

- **Restoring bogs** — by rewetting and re-establishing sphagnum mosses — can **halt emissions and restart carbon storage**.
- Projects like **Bord na Móna's Peatland Climate Action Scheme** and **National Parks and Wildlife Service restoration efforts** are now rewetting thousands of hectares.
- Over time, restored bogs can once again become **net carbon sinks** and also improve **biodiversity, water quality, and flood control**.

The Research and Evidence Shows -Stored Carbon in Peatlands

- Peatlands (bogs) are extremely carbon-rich. Globally, they store **30% of all soil carbon**, despite covering only a small fraction of land Worldwide.
- In Ireland specifically, peatlands are estimated to store very large amounts of carbon -for example,
- **Raised Bogs**: mean carbon density is around 1,314 tonnes Carbon/ha
- **Lowland Blanket Bogs**: Mean carbon density is 1,022 tonnes Carbon/ha
- **Upland Blanket Bogs**: Mean carbon density is 420 tonnes Carbon/ha.

Ireland's Target for Carbon Emissions

What the Targets Are

- Under Irish law, the target is a **51% reduction** in greenhouse gas (GHG) emissions by 2030 compared to 2018 levels.
- Under the EU's Effort Sharing Regulation (for non-ETS sectors: transport, buildings, agriculture, etc.), Ireland must cut emissions by **42% by 2030** (relative to 2005).

What the Latest Projections Say

- The **EPA (Environmental Protection Agency)** projects that, even if all currently planned climate policies are fully implemented, Ireland will only reduce emissions by **~23% by 2030** (relative to 2018).
- That's very short of the 51% national target.
- The EPA also warns that most sectors (transport, industry, agriculture, etc.) are on trajectories that exceed their "sectoral emissions ceilings" — meaning they're projected to emit more than what would be allowed under ideal sector-by-sector targets.
- According to the EPA's detailed projections (2022–2040), Ireland is expected to **exceed** its first two carbon budgets (2021–2025 and 2026–2030) by a "significant margin."
- On the EU target front (42% reduction), the EPA says even in a more ambitious policy scenario Ireland would only get to about **22%** reduction by 2030 in the non-ETS sectors.

Consequences

- Because Ireland is likely to miss significant parts of its 2030 targets, it could face **billions in costs**. Some estimates suggest a penalty or compliance cost up to **€26 billion** if targets aren't met.
- To close the emissions gap, there will need to be *much more investment*, especially in things like the electricity grid, EV charging, rewetting peatlands, and transforming agriculture.

Special Risks in Bogs and Peatlands

Bogs are particularly sensitive because:

- They're **acidic and anaerobic**, which slows breakdown of pollutants.
- They act as **carbon sinks**, so contamination can disrupt carbon storage.
- Even small leaks can persist and **bioaccumulate** in mosses and water organisms.

Environmental Protection of Lemanaghan Bog

Designated or Protected Habitat

- Lemanaghan Bog is part of a **Special Area of Conservation (SAC)** and/or **Natural Heritage Area (NHA)** under the **EU Habitats Directive (92/43/EEC)** and the **Wildlife (Amendment) Act 2000**.
- Any works causing damage, drainage, or disturbance to the bog's structure or hydrology would **breach statutory protections**.

Impact on Flora and Fauna

- Lemanaghan Bog supports **protected species** such as the **red listed**-hen harrier, curlew and woodcock, **amber listed**- Kestrel, Sparrowhawk, Snipe, Skylark, Stonechat & Linnet and **Fauna** bog rosemary, sundew, and much more.
- Disturbance, noise, and habitat fragmentation threaten these populations.

Cultural and Heritage Grounds

- Lemanaghan is an area of **high archaeological and cultural importance**, with early Christian monastic remains and traditional bogland landscapes.
- Development could **diminish its heritage value** and violate protections under the **National Monuments Acts**.
- Enormous records of archaeology have been recorded in Lemanaghan bog, research by Rafferty and Hickey states that "Lemanaghan Bog is located towards the northwest of the county and was surveyed between 1993 and 1997. Bord na Mona exploits 1,200ha of bog at Lemanaghan, which is part of a larger wetlands in the region. The IAWU identified 630 archaeological sites, making it one of the highest densities of wetland archaeology in the world.
- **Some of the Artefacts associated with the site include-** The Lemanaghan Crozier, Wooden Staff, Polished Stone Axe-head, Stone Axe-head, Flint Scraper Spearhead, Shoes, Wooden Finds and a hoard of Silver Coins

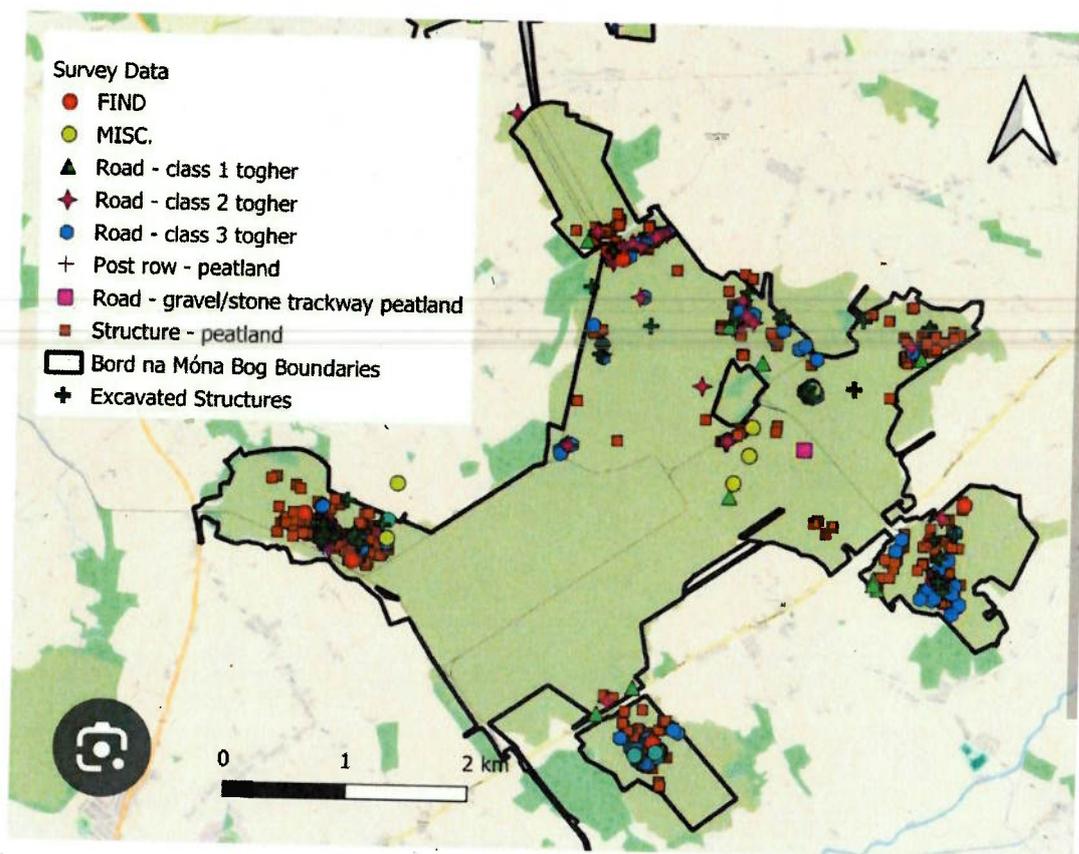
Archaeology:

- Bogs preserve history like nowhere else — from **bog bodies** and **ancient trackways** to **Iron Age artefacts**. The Midlands' bogs are time capsules of Irish heritage.

From Extraction to Restoration

- Industrial peat cutting is ended
- **New uses:**
 - Carbon farming
 - Wildlife reserves
 - Walking trails and eco-tourism
- "The future of bogs is about balance — protecting nature while supporting local communities.

Map of Archaeological Finds in Lemanaghan Bog 1993-1997



Time to Restore Lemanaghan Bog”

We stand here today for Lemanaghan Bog, a place of life, of heritage, and of deep connection to our community. For generations, this bog has given — its turf, its land, its spirit — but it has given enough.

Bord na Móna has taken enough from Lemanaghan Bog. The digging, the draining, the cutting — it cannot go on. The time for extraction is over. The time for restoration is now.

This bog is not just soil and water. It's a living ecosystem — home to rare species, to archaeology, to history, to the quiet beauty that makes Ireland what it is. Once destroyed, it cannot be replaced.

We're not here to fight against progress — we're here to fight for the future. A future where the bog breathes again, where water returns to the land, where carbon stays in the ground, and where the next generation can walk these paths with pride.

So today, we say clearly and with one voice:

☀ Enough has been taken.

☀ It's time to give back.

Let's make Bord na Móna listen — and let's make The Restoration of Lemanaghan Bog the legacy we leave behind.

Thank you.