

Cathy Carleton

From: Sean Halligan <seanahalligan@gmail.com>
Sent: Monday 27 October 2025 10:20
To: Appeals2
Subject: SU19.323676
Attachments: 1Sean Halligan Observations on Case SU19.323676_26thOctober2025.pdf

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Dear Sir/Madam,

Please find attached my submission in relation to **Case SU19.323676 – Substitute Consent for Peat Extraction and Ancillary Works at Lemanaghan Bog, County Offaly.**

The submission, titled "*Compliance with the Lemanaghan County Offaly Conservation Plan (2007) and Objection to Wind Farm Development on Archaeological Grounds*", is made by **Mr. Sean Halligan**, Lemanaghan, Ballycumber, Tullamore, Co. Offaly, R35 W205.

Name: Sean Halligan

Address: Lemanaghan, Ballycumber, Tullamore, Co. Offaly, R35 W205

Tel: 0868379825

email seanahalligan@gmail.com

I would appreciate confirmation of receipt of this submission and acknowledgement of its acceptance for consideration by An Coimisiún Pleanála.

Thank you for your attention to this matter.

Kind regards,

Sean Halligan

Observation to An Coimisiún Pleanála under Section 131A of the Planning and Development Act 2000 (as amended)

To: An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1, D01 V902

Re: Case SU19.323676

Substitute Consent for Peat Extraction and Ancillary Works at Lemanaghan Bog, County Offaly

From: Sean Halligan

Address: Lemanaghan, Ballycumber, Tullamore, Co. Offaly R35W205

Date: 26th October 2025

Submission Number 1

Subject: Compliance with the *Lemanaghan County Offaly Conservation Plan (2007)* and Objection to Wind Farm Development on Archaeological Grounds

1. Introduction

I wish to make this submission in respect of the above planning file, with particular reference to the *Lemanaghan County Offaly Conservation Plan (2007)* — a document jointly prepared by The Heritage Council, Offaly County Council, and the local community.

This submission acknowledges the compliance measures evident in the Substitute Consent application (Case SU19.323676), particularly in relation to heritage assessment and site rehabilitation. However, I strongly submit that **any subsequent proposal to construct a wind farm or associated energy infrastructure on Lemanaghan Bog would be entirely inconsistent with the Conservation Plan and with the national and county-level objectives for heritage protection.**

Lemanaghan is one of Ireland's — and indeed Europe's — richest archaeological wetlands. It is a sacred, living landscape whose integrity

would be adversely and irreversibly affected by the introduction of industrial wind turbines.

While this submission acknowledges that Case SU19.323676 pertains specifically to substitute consent for peat extraction, I submit that its determination will have material implications for any future land-use proposals at Lemanaghan Bog, including wind energy development. My comments are therefore confined to heritage and landscape considerations relevant to this and any subsequent planning decisions affecting this site. This observation is made in the context of the Board's statutory duty to assess the potential cumulative and precedent-setting implications of substitute consent decisions under Section 177K of the Planning and Development Act 2000 (as amended).

Under Section 34(2) of the Planning and Development Act 2000 (as amended), An Coimisiún Pleanála must have regard to "the provisions of any development plan, any local area plan, and any relevant policy of the Government." The Lemanaghan Conservation Plan (2007), while non-statutory, constitutes a relevant local policy document under this provision.

2. Context and Compliance of Case SU19.323676

The current Substitute Consent application seeks retrospective regularisation of peat extraction activities. The accompanying *Remedial Environmental Impact Assessment Report (rEIAR)* and *Remedial Natura Impact Statement (rNIS)* demonstrate an understanding of the site's heritage sensitivity.

The inclusion of documentation such as "*The Archaeology of Lemanaghan Bog, Co. Offaly*" and *Recorded Monuments Inventory* is welcome and demonstrates partial compliance with the Conservation Plan's requirement for rigorous cultural heritage assessment.

Furthermore, the accompanying *Decommissioning and Rehabilitation Plan* reflects the Plan's vision for post-industrial restoration of the bog landscape and cessation of destructive peat extraction.

However, while these measures comply with the **remedial** aims of the Conservation Plan, they do not in any way legitimise or pave the way for

new industrial development, such as a wind farm, that would irreversibly alter the landscape, its archaeology, and its spiritual character.

Section 6 of the National Monuments (Amendment) Act 2004 requires that archaeological monuments and sites are protected from works that might endanger them. The Commission's consideration of any development within Lemanaghan Bog must therefore prioritise archaeological preservation.

3. Core Principles of the Lemanaghan Conservation Plan

The *Lemanaghan County Offaly Conservation Plan (2007)* establishes a framework for all future management and decision-making concerning the Lemanaghan landscape.

The following are key principles agreed upon by stakeholders and remain binding on any planning or development assessment:

1. Protection of Archaeological and Cultural Heritage

- Preserve the integrity of archaeological sites, monastic remains, holy wells, trackways (toghers), and other early medieval features.
- Prevent physical disturbance of peatlands where archaeological deposits may survive.

2. Preservation of Landscape Setting and Sense of Place

- Maintain the “sense of being apart” — a defining characteristic of Lemanaghan’s sacred and historic environment.
- Avoid intrusive modern structures that would visually dominate or degrade the landscape.

3. Environmental and Hydrological Stewardship

- Protect peat hydrology, water table, and ecological systems, as these directly influence the preservation of archaeological material.

4. Long-Term Community Involvement and Heritage Management

- Ensure any future land use decisions involve heritage agencies, local communities, and landowners in a stewardship capacity.

These principles, agreed through extensive local consultation, remain in effect as the governing framework for the management of this heritage landscape.

4. Why a Wind Farm Is Not Compatible with the Conservation Plan

While the current application does not itself seek permission for a wind farm, certain references within the remedial documentation to potential future land uses necessitate clarification that such industrial development would be inconsistent with the Conservation Plan and heritage policy.

A wind farm development at Lemanaghan Bog would contravene the above principles in several fundamental ways:

(a) Archaeological Sensitivity

Lemanaghan Bog is one of the most archaeologically rich wetlands in Europe. Excavations and surveys have recorded exceptional preservation of wooden trackways, artefacts, and structures within the peat matrix. Turbine foundations, crane hardstands, access roads, and cabling works would necessitate deep excavation and soil compaction, inevitably disturbing or destroying these irreplaceable contexts.

(b) Visual and Spiritual Integrity

The Conservation Plan emphasises Lemanaghan's "spiritual and contemplative" landscape.

Wind turbines, reaching over 200 metres in height, would dominate views from St. Manchan's Monastic Site, St. Mella's Cell, the Holy Well, and the historic pilgrim routes across the bog.

Such industrial intrusion would permanently erode the "sense of being apart" that the Plan seeks to preserve.

(c) Hydrological Disruption

Turbine construction requires extensive drainage and foundation works that disrupt bog hydrology, lowering the water table and accelerating peat decay.

This would not only impact ecology but also endanger the waterlogged conditions necessary for the preservation of organic archaeological remains.

(d) Non-Compliance with Plan's Vision for Post-Industrial Restoration

The Plan envisions a transition from industrial exploitation to **restoration and cultural regeneration**, promoting conservation, education, and heritage tourism.

A wind farm represents a **continuation of industrialisation**, inconsistent with that agreed vision.

(e) Precedent and Cumulative Impact

Approval of a wind farm at Lemanaghan, I believe would set a precedent inconsistent with established heritage protection policy. for the industrialisation of heritage boglands nationwide, undermining the purpose of the Conservation Plan and weakening trust in heritage protection frameworks.

5. Policy and Legislative Context

- **National Planning Framework (NPF) Objective 58** commits to protecting and enhancing the landscape and archaeological heritage of rural Ireland.
- **National Monuments Acts (1930–2014)** require that all works with potential to impact archaeological remains are subject to ministerial consent and avoidance strategies.
- **Offaly County Development Plan 2021–2027**, Heritage Objective CHPOL-06, calls for “protection of the character, setting, and amenity of archaeological landscapes and monuments.”
- The *Lemanaghan Conservation Plan* is an adopted local heritage policy document; under **Section 10(2)(c)** of the Planning and

Development Act 2000 (as amended), its provisions must inform development decisions.

In this policy framework, a wind farm at Lemanaghan cannot be considered a compatible land use.

6. Respectfully ask

- 1. That An Coimisiún Pleanála and Offaly County Council recognise the Lemanaghan Conservation Plan (2007) as the governing policy for this landscape.**
- 2. That the Board explicitly state, in its decision on Case SU19.323676, that any future landscape change, wind farm or comparable industrial development would contravene the Conservation Plan and relevant heritage objectives.**
- 3. That Lemanaghan Bog be formally designated a “no-development” zone for large-scale energy infrastructure under the next revision of the County Development Plan.**
- 4. That all rehabilitation and restoration works arising from the current application continue to prioritise peatland rewetting, archaeological preservation, and heritage interpretation in line with the 2007 Plan.**

7. Conclusion

The *Lemanaghan County Offaly Conservation Plan (2007)* represents a binding social and cultural contract between the State, the community, and the landscape.

While the current Substitute Consent application (SU19.323676) demonstrates partial compliance through environmental assessment and rehabilitation planning, it cannot — and must not — be used as a precedent to justify a wind farm.

A wind farm would irreversibly compromise one of Europe's richest archaeological wetlands, violate the guiding principles of the Conservation Plan, and erode the integrity of a sacred landscape revered for over 1,200 years.

I respectfully request that An Coimisiún Pleanála, in its determination of Case SU19.323676, affirm that Lemanaghan Bog is an unsuitable and inappropriate location for any future wind energy or comparable industrial development, insofar as such proposals have been referenced or implied within the current substitute consent application.

The Lemanaghan County Offaly Conservation Plan (2007), is publicly available in digital format from the Heritage Council at the following URL: https://www.heritagecouncil.ie/content/files/lemanaghan_county_offaly_conservation_plan_2007_2mb.pdf.

Signed: _____

Sean Halligan

Lemanaghan, Ballycumber, Tullamore, Co. Offaly R35 W205

Date: 26 October 2025