

Catherine

Cathy Carleton

From: sean corcoran <lemonaghan2@gmail.com>
Sent: Saturday 14 February 2026 10:15
To: Appeals2
Subject: Case Number: ACP-323676-25
Attachments: LEMANAGHAN-BOG_OBSERVATIONS ON FURTHER INFORMATION_SEAN.docx

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Dear Sir/Madam,

I refer to your letter of the 30th of January 2026 in relation to the above.

Attached please find my response to same.

Thanking you.

Yours Faithfully,

Sean Corcoran
Leamonaghan
Ballycumber
Co.Offaly

OBSERVATIONS ON FURTHER INFORMATION

Archaeology as a Recognised Land-Use Constraint within an Archaeologically Exceptional Landscape

Substitute Consent Application SU19.323676

Section 177E, Planning and Development Act 2000 (as amended) relating to development at Lemanaghan Bog, Co.Offaly.

Case Number: ACP-323676-25

Observer:

Sean Corcoran

Leamonaghan

Ballycumber

Co.Offaly

1. Purpose of These Observations

These observations are submitted in response to the further information furnished by the applicant in respect of the above substitute consent application.

They are **limited in scope and procedural in nature**. They do not seek to assess archaeological impacts, to identify new archaeological material, or to invite refusal on heritage grounds.

Their purpose is confined to assisting the Commission in considering whether the applicant has demonstrated the **procedural completeness and clarity of legal interest** required to invoke the exceptional jurisdiction under Section 177E, having regard to the **established archaeological sensitivity of the receiving environment**.

2. Archaeological Context of Lemanaghan Bog

Lemanaghan Bog is widely recognised as a landscape of **exceptional archaeological richness**, particularly in respect of early medieval ecclesiastical activity and peatland archaeology.

Peatland environments such as Lemanaghan are known to preserve archaeological material of a type and quality rarely found elsewhere, including organic artefacts and features that survive due to anaerobic conditions within the bog.

The archaeological record demonstrates that Lemanaghan Bog is not a passive background landscape, but a receiving environment with a proven capacity to contain archaeological material of exceptional significance

3. National and International Significance of Finds from Lemanaghan

The archaeological significance of Lemanaghan Bog is evidenced by publicly documented discoveries, including:

- **Early Medieval Crosier**

Lemanaghan is the only location where an early medieval crosier has been recovered since the 19th century. The fragmented nature and spatial distribution of the find indicate broader archaeological activity within the bog. The object is on permanent display in the National Museum of Ireland and has been discussed in recent international academic literature, reflecting its national and scholarly significance.

- **Portable Ogham Inscription**

Apart from Clonmacnoise, Lemanaghan represents one of the very few modern-period recoveries of an ogham inscription on a portable object. Such finds are extremely rare and of high archaeological importance, and have been published in peer-reviewed academic journals.

- **Early Medieval Wooden Staff**

An early medieval wooden staff recovered from Lemanaghan Bog featured in *Credo*, one of the largest international exhibitions on the conversion to Christianity, held in Paderborn, Germany. The artefact is also on permanent display in the National Museum of Ireland, illustrating the international significance of material recovered from this landscape.

These finds collectively demonstrate that Lemanaghan Bog is of **national and international archaeological importance**.

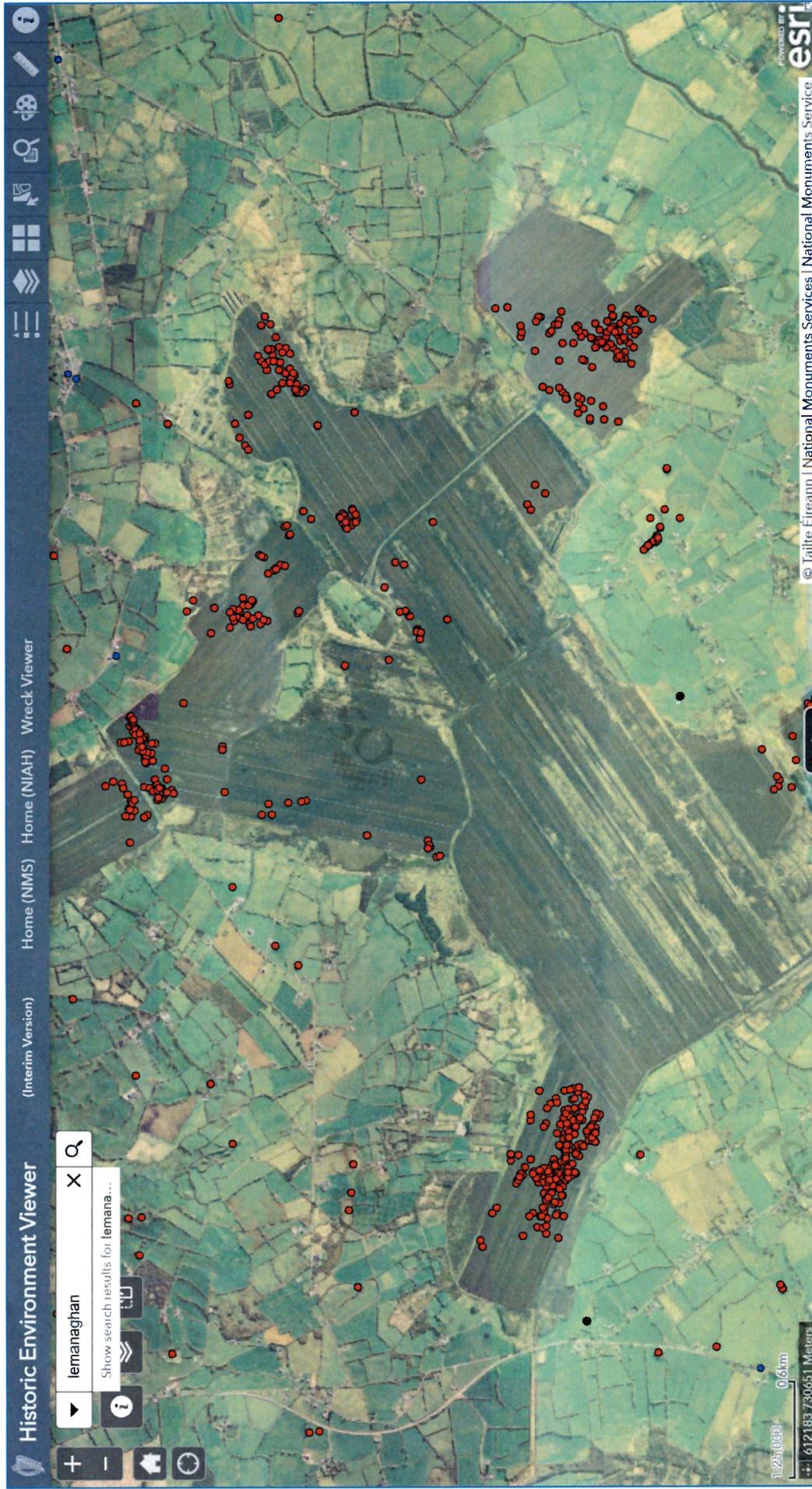


Figure A1 – Archaeological Sites Recorded within and Adjacent to Lemanaghan Bog

Screenshot from the **Historic Environment Viewer (Interim Version)** showing recorded archaeological sites and monuments (red points) within and surrounding Lemanaghan Bog.

The density and distribution of recorded sites illustrate the **extraordinary archaeological richness** of the Lemanaghan landscape and confirm that the bog forms part of a **highly sensitive archaeological environment**, where both known and potential subsurface remains are a recognised land-use constraint.

Source: National Monuments Service / Historic Environment Viewer.

The significance of these finds is referenced here solely to demonstrate that archaeology within Lemanaghan Bog is not hypothetical or speculative, but a proven and **material constraint on land use** which warrants acknowledgment where an applicant relies on an unqualified ownership interest for the purposes of Section 177E.

4. Archaeology as a Recognised Constraint on Land Use

Archaeology operates as a constraint on land use **independently of land ownership**.

Where archaeological features, zones of archaeological potential, or archaeologically sensitive environments exist, the manner in which land may be worked, altered, or developed is constrained by statutory protections and oversight requirements.

In planning practice, archaeology is therefore treated as a **recognised land-use constraint**, limiting the extent to which land can be regarded as being subject to unrestricted control by an owner.

Peatland landscapes with a proven archaeological record, such as Lemanaghan Bog, are routinely approached on this basis in environmental and planning assessment.

5. Relevance to Legal Interest under Section 177E

In a substitute consent application under Section 177E, the Commission must be satisfied, as a threshold matter, that the applicant has demonstrated a **clear, coherent and reconcilable legal interest** in the lands to which consent is sought.

Where lands are subject to recognised constraints on land use — including archaeology — it is relevant for the Commission, as a threshold jurisdictional matter, to understand how those constraints are acknowledged and reconciled with the ownership interest relied upon.

The further information submitted relies on a Landowner Letter of Consent asserting freehold and beneficial ownership. No accompanying material addresses archaeological sensitivity, zones of archaeological potential, or the manner in which established archaeological constraints interact with the ownership asserted.

This omission is relevant to the Commission's consideration of procedural completeness, as it highlights that the ownership interest relied upon is not an unrestricted interest and that known land-use constraints affecting the application lands have not been addressed in the material submitted.

6. Procedural Completeness

These observations do not invite the Commission to adjudicate on archaeology, nor to determine the existence or extent of archaeological remains.

They are made solely to highlight that archaeology is an **established and recognised constraint** affecting peatland landscapes such as Lemanaghan Bog, and that its omission from the material relied upon to demonstrate legal interest is a matter of **procedural completeness** in the context of Section 177E.

7. Conclusion

Lemanaghan Bog forms part of a landscape of exceptional archaeological sensitivity, as evidenced by artefacts of national and international importance and a proven capacity to preserve rare archaeological material.

In circumstances where the Commission has sought further information for the purpose of clarifying legal interest and standing, the absence of any reference to such recognised archaeological constraints is relevant to whether the statutory preconditions for the exercise of jurisdiction under Section 177E have been demonstrated.

These observations are submitted in a constructive manner to assist the Commission in ensuring that its assessment proceeds on a **fully informed and procedurally robust basis**, having regard to the established archaeological context of the receiving environment.