



PAX19.324161

18 May 2026

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1

Dear Sir/Madam

Re: PAX19.324161- Proposed development of 15 no. wind turbines, a permanent 220kV on-site substation, and associated infrastructure AT Lemanaghan and surrounding townlands, Co. Offaly

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council has reviewed this planning application and associated documentation. The Heritage Council support the roll out of renewable energy as the preferable form of energy generation. However, such large infrastructure development as this, can have significant environmental impacts. Furthermore, the Heritage Council's support for renewable energy generation is based on its potential to reduce greenhouse gas emissions at source. It is therefore important that we put strong emphasis on whether the proposed renewable energy development is more positive for climate as opposed to the carbon losses that may occur from the development, or if the development compromises the future carbon sequestration of a rehabilitated peat bog.

We have divided our submission under the following headings:

- Overarching comment
- Climate Action
- Biodiversity
- Cultural Heritage

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Overarching comment

It is important to state from the outset, that the development site is subject to IPC Licence (Ref. P0500-01) from the EPA. Condition 10 of this same licence requires Bord na Móna to prepare and implement a Cutaway Bog Rehabilitation Plan. The EIAR reporting (Chapter 2 page 84) states that irrespective of any further development on the site, the measures outlined in the Draft Rehabilitation Plan will be implemented by Bord na Móna in agreement with the EPA, as per Bord na Móna IPC Licence obligations.

The Heritage Council's primary emphasis in this regard is the following:

- The compatibility of the scale of development with the rehabilitation of the bog
- The soundness of the assessment of climate and biodiversity impacts, if not based on the licenced rehabilitation plan, and therefore the potential future baseline of the site.

In terms of the latter, several chapters of the EIAR as part of their thematic assessment, rightly state under the "Do Nothing Scenario" that - *If the Proposed Project were not to proceed, the site would continue to be managed under the requirements of the IPC licence (P0500-01) and therefore the ongoing decommissioning activities, site management and environmental monitoring would continue*" and *"Therefore the existing baseline of the landscape will transition from a predominantly industrial cutover peatland landscape, with open exposed peat surfaces and drainage features, to a **more natural mosaic landscape of cutaway peatland, wetland and regenerating bog habitats**". [Our Emphasis]*

This is a sound assessment position, as it is based on a statutory licencing requirement, necessitated by a parallel consenting regime, in this case the Environmental Protection Agency's IPC Licence. However, it therefore follows that the assessment of impacts, particularly in relation to climate and biodiversity, should not just be confined to the current condition of the site, which in theory is not currently static but evolving to a rehabilitated state.

This understanding should be demonstrated in order to ensure that the rehabilitation of the bog is not undermined by the development. We will deal with this point under each relevant thematic heading.

We also submit that there is evidence of a trend towards increasing renewable developments in the area, and the Heritage Council has a growing concern about impacts on the setting of cultural heritage features, ranging from candidate World Heritage Properties to monastic complexes.

Climate Action

The fundamental premise of the assessment in the Climate chapter is based on a calculation of the carbon losses and savings from the project i.e. does the carbon savings from the renewables project outweigh the carbon losses of the project? In this regard, the key question for the Heritage Council is if the licenced rehabilitation of the bog would be compromised by the proposed development.

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This chapter has emphasised the history of industrial peat extraction on site, and that drainage over several decades has resulted in the peatland habitats and hydrology being highly degraded and modified from their original state. The assessment goes on to state that “*As such, the peatland habitat loss would not be as significant as that of an intact peatland*”. It should be acknowledged at this point that the current state of the bog is evolving under the rehabilitation plan.

Notwithstanding that it has been acknowledged that there certainly are going to be losses to the capacity of peat soils in the area around the foundations of the turbines etc, there is a need to understand if there will be any losses to the carbon fixing and sequestration potential associated with the rehabilitation in a general sense.

In this regard, it is important to note that whilst it is true that as a habitat, peat bog fixes carbon slowly, its primary advantage is in the long-term storage and sequestration of carbon that can only be understood over long time horizons.

The EIAR has noted that the total losses from reduced carbon fixing potential and losses to soil organic matter, and due to the leaching of dissolved and particulate organic carbon ranges from 39,607 to 175,877 tonnes CO² equivalent (total losses are 261,360 – 400,038 tonnes). The savings are calculated at 1,973,125 tonnes of carbon dioxide over the 35 Year Life of the windfarm. This is more than the 261,360 - 400,038 and the EIAR suggests that within 5 years of the operation of the windfarm these losses will be compensated.

Whilst this is clear, we return to our point about carbon storage/sequestration. There is a subsequent discussion on carbon sequestration loss, which is estimated to between 8.2% and 17.6%. It is not currently clear to the Heritage Council how this fits into the overall calculation and what this is a percentage of and if, when considered alongside the total carbon losses, the balance for carbon savings remains positive.

In conclusion, we recommend that the Commission satisfy itself that the carbon sequestration potential from the full rehabilitation that will be lost has been accounted for within the overall carbon savings/losses calculation, to ensure that the scheme has a positive balance and that raised bog rehabilitation can continue alongside the wind farm development.

This we believe is needed to ensure compliance with Policy BLP-18 and Objective BLO-11 of the adopted Offaly County Development Plan 2021-2027.

Biodiversity

Similar to our comments on the climate assessment, the Heritage Council has put strong emphasis on the licenced rehabilitation.

In general terms we believe the assessment as presented to be sound in terms of the identification of key ecological receptors, as well as the key species-specific requirements including the mitigation measures identified for key bird species in the Ornithological Chapter

We recognise that only small pockets of Annex I habitat exist on site, and therefore the main habitat type on site (i.e. cutover bog) is, in its current state, not of exceptional high ecological value.

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However, similar to our points on climate, we would request to the Commission that it ensure that the rehabilitation plan, as required under licence, and the potential habitat that will be created through active restoration measures is accounted for in this assessment. This is noted again in the “Do Nothing Scenario” in this chapter and therefore any displaced future ecological value from the proposed turbine development should be considered.

In general terms, we do note the relatively small surface area, as a percentage of the bog, that will be lost. We accept that as presented that there is not necessarily an incompatibility with the rehabilitation and the proposed project. We would, however, make the following points:

- The biodiversity enhancement measures as provided for by this development need to be couched within the rehabilitation plan for the entire bog, to ensure that they are broadly aligned with the ecological restoration ambitions.
- Any subsequent extension permission should be contingent on a monitoring regime of the successful licence rehabilitation plan during the life of the wind farm. Peatland restoration is a long-term process and given the complex hydrological and biochemical regimes of such habitats, there will be a need to monitor the development’s impact on the restoration in real time. A condition of permission is essential for this.

This we believe is needed to ensure compliance with Policy BLP-01 and BLP-14 of the adopted Offaly County Development Plan 2021-2027.

Cultural Heritage

Our two main considerations relating to archaeological heritage are:

- Direct impacts on potential unknown archaeology on site
- Indirect impacts on key cultural heritage features, particularly in relation to the setting of such features

Unknown Archaeology

From the outset, the Heritage Council considers this site as having high archaeological potential for unknown finds and features. We acknowledge that peatland environments are not conducive to geophysical surveying, and therefore the location of the turbines, access routes, and the main development components have not been informed by a level of investigation/surveying that would be possible in other environments. However, given the large number of records on site (491), it should therefore be assumed that the entire area is an area of high archaeological potential.

This is in accordance with the view of the National Monuments Service as expressed at scoping stage (section 13.1.5.2 of the Cultural Heritage Chapter) and by the Cultural Heritage Assessment of the Boora Bog Group carried out in 2018 on behalf of Bord na Móna (section 13.2.2.1.8) which noted that *‘there remains a moderate to high potential for additional buried features to be uncovered during the course of any future development works in the Lemanaghan Bogs, particularly but not exclusively, within the previously identified archaeological zones.’*

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However, we note that the result of the field investigation (para 13.2.1) has stated “*no potential archaeological sites, structures or stray finds*”. The Heritage Council therefore has interrogated how this conclusion has been arrived at, and we make the following comments.

We note the sources consulted (13.1.7) do not include publicly available LiDAR resources. LiDAR coverage of Lemanaghan is available online on the Open Topographic Data Viewer which displays data from the OPW National Aerial Survey Contract (NASC). This is an essential tool for archaeological heritage management. The LiDAR coverage also includes portion of the proposed development site. This should be consulted.

We note the comment (13.1.8) that drain sections which ‘were visually inspected were not obscured by water or vegetation’ while also noting that ‘drains have not been recently cut given that peat production ceased on the site in 2020’ and therefore that ‘the absence of recent drain cutting means that drain faces were not all clean and/or conducive to the detection of archaeological features or monuments.’

The primary means of examining peatlands for archaeological remains is by walking over freshly milled surfaces and checking the faces of drainage ditches for traces of archaeological structures, finds and timbers. Given the end of peat cutting and that maintenance of drains has also ceased we caution against relying extensively on recent field walking or trial pits as a means to detect archaeological remains at present within the proposed development site. Section 13.1.9.1 only obliquely acknowledges this as a limitation, and it is not sufficiently acknowledged as a limitation in section 13.2.1.

We point out the lack of reference to the recovery of human remains (portion of a ‘bog body’) from Tumbeagh by the former Irish Archaeological Wetland Unit in 1998. This was radiocarbon dated to the medieval period and was subsequently published as a (2006) monograph.

We note that 491 Recorded Monuments are located within the proposed project site and that ‘the majority of these monuments were identified as a result of a peatland survey carried out within the site by the Irish Archaeological Wetland Unit (IAWU) in 1993-4 as part of the Archaeological Survey of Ireland Peatland Survey’ (section 13.2.2.1.3; 13.3.3.3). This is a significant number of archaeological monuments in terms of the proposed development site. We note the assertion (section 13.3.4.3) that ‘industrial peat production and associated activities which continued at the site until 2020 is considered to have resulted in the removal of the vast majority of monuments within the proposed project site.’

This may be the case for the monuments recorded by the former peatland surveys as exposed on the surface of the milled bog. We hold to the view that the known monuments are most likely an indication of the archaeological potential of the peatland and that further archaeological remains are awaiting discovery at depth in the bog and potentially in the surrounding areas. This aligns with the recent studies of the site, and the view of the National Monument Service’s scoping opinion.

Finally, there is a curious absence of monuments in the central area of the bog around proposed turbines 1-8 and it is difficult to understand if this is due to survey and former peat harvesting considerations or whether this reflects a pattern in past activity.

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In conclusion, there are some limitations associated with the archaeological assessment. We recommend that the proposed archaeological mitigation be closely adhered to as devised by the National Monuments Service and that paleo-environmental analysis should be an integral part of this. The Lisheen mine development in Tipperary to date represents the most detailed archaeological and palaeo-environmental investigation ever undertaken in an Irish peatland and as far as we are aware, this an approach that has yet to be undertaken in a Bord na Mona bog. We recommend that a well-designed archaeological and palaeo-environmental programme of investigation be devised as part of this proposed development and that this be required by condition.

This is needed to ensure compliance with Policy BHP-33 of the Offaly County Development Plan 2021-2027.

Setting of cultural heritage sites

The Heritage Council has put emphasis on the following features:

- The cumulative impact on the *potential* Outstanding Universal Value (OUV) of the tentative World Heritage Property Royal Sites of Ireland
- Setting impacts on national monuments
- The setting of Lemanaghan Monastic Complex and the method of assessment

Tentative World Heritage Site Royal Sites of Ireland (Hill of Uisneach)

The Heritage Council fundamentally disagree with the views set out in section 13.2.2.1.1 that the *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (UNESCO, 2022) cannot be used as there is no agreed framework for assessment for tentative sites or the suggestion that there needs to be a formally adopted Outstanding Universal Value from an international organisation.

An assessment of impacts on sites that seek UNESCO status based on their potential OUV is needed to ensure that the future success of applications for such status is not compromised. The most relevant and closely related assessment for this is the *Toolkit*. Attributes of OUV can be identified in a potential OUV.

The Commission needs to familiarise itself with the [submissions](#) of the Heritage Council and the National Monuments Service on the proposed development for the tentative World Heritage Site at the Valentia Trans-Atlantic Cable, where the principle of a HIA of the potential OUV of a tentative site has been established by the country's relevant public bodies.

The Heritage Council would recommend that liaison with the NMS be undertaken to determine the need for a full HIA of the [potential OUV of the Royal Sites](#). If there is a potential impact, attributes of authenticity can be deduced from the potential OUV and a full HIA can be requested.

This is required to conform with policies CPO 14.22 of the Westmeath County Development Plan 2021-2027.

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National Monuments including Clonmacnoise

The Heritage Council is of the view, that should there be theoretical visibility of the turbines from any of the national monuments, then such locations should be included in the representative viewpoints analysis provided in the Landscape and Visual Assessment Chapter in order to have a full understanding of impacts on setting. This includes the monastic settlement of Clonmacnoise. This is currently not the case, and we cannot give a definitive view of the indirect impact on the setting of such monuments.

This is required to conform with policies BHP-41 and BHP-43 of the Offaly County Development Plan 2021-2027.

Lemenaghan Monastic Complex

The EIAR notes that the monastic complex is located between c. 1km-1.2km south-west of the nearest proposed turbine, T14 and is located in an area in which the Zone of Theoretical Visibility demonstrates theoretical visibility of 11-15 proposed turbines. The EIAR submitted with the application has acknowledged the Conservation Plan commissioned by the Heritage Council in 2007. This Conservation Plan has been reflected in the Offaly County Development Plan 2021-2027 with the stated intention that the planning authority will have regard to this plan when assessing applications that are within this area or in close proximity to this area.

The Heritage Council retains the position that the site is of national archaeological significance and is a rich ensemble of archaeological and architectural features.

With this in mind, it is necessary for us to comment on the premise of the assessment on two particular points made:

1. Table 13-2: 'Sensitivity of Cultural Heritage Receptors Considered' has identified Sites and Monuments and Recorded Monuments on a Medium to High range in terms of sensitivity.
2. Table 13-4 and section 13.1.10.3 suggest that the maximum possible effect on setting is a moderate effect. 'Very Significant' and 'Profound' are reserved for adverse direct effects which result in the total removal of cultural heritage assets

The second premise is fundamentally flawed. Firstly, 'significant' magnitude is also a possibility outside of 'very significant' or 'profound'. However, more importantly is the premise that there are no significant effects possible for setting (indirect effects) because it is suggested that significance be reserved for direct effects for 'cultural heritage' assets. To apply this premise universally is unsound. It suggests that no matter the importance of the feature, that unless there are direct impacts there is no significant effect. As an example, it may suggest that the monastic complex at Glendalough could theoretically absorb substantial development in its setting, as it would not be deemed significant, unless there were adverse direct impacts on the monastery itself.

The Heritage Council cannot accept the premise of a maximum 'moderate' effect for setting of any cultural heritage asset.

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With regards to point one, we do note that the commentary has distinguished the Lemanaghan Monastery complex from other Recorded Monuments and has given it a high sensitivity. However, it is not clear if this has been accounted for in the conclusion.

Therefore, for this 'high' sensitivity cultural heritage site, the EIAR notes that it experiences a 'moderate' magnitude of effect, which is negative and long term. It is not clear how a moderate/medium negative effect on a high sensitivity feature can be concluded as 'not significant'. With due regard to the described methodology from the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (EPA, 2022)¹, we cannot accept this. An excerpt of which is provided here based on the discussion on determining significance:

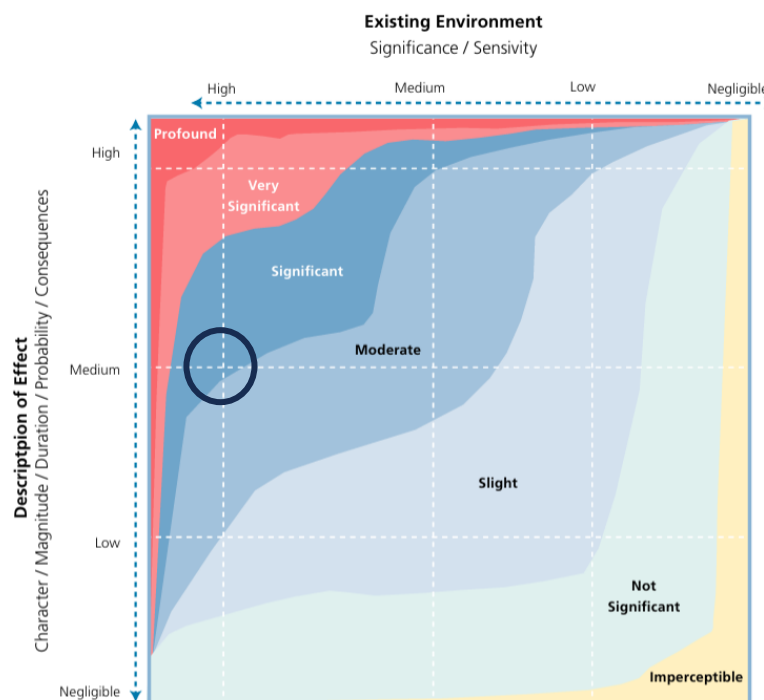


Figure 1 – Excerpt of EPA guidance on determining significance i.e. character/magnitude of the predicted effect to the sensitivity of the receiving environment can determine the significance of the effect. Intersection of significance (circle) identified by Heritage Council

As previously described – we do not agree with the premise that the impact on setting can be maximum moderate. However, even with a moderate/medium effect on a high sensitivity feature, this should be considered significant, as per figure 1.

¹ The Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (EPA, 2022) recommends that significance be determined by combining the sensitivity of the receptor with the character/magnitude of effect. This is on Page 53 of these guidelines. Section 13.1.10 of Chapter 13 appears to conflate magnitude with significance. Magnitude should typically be based on a low – high spectrum, with significance confined to an imperceptible to profound spectrum

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Having reviewed the Landscape and Visual Chapter and the associated views analysis and with due regard to the photomontages provided, which include representative viewpoints from the monastic complex, we believe that there is a medium to high magnitude of effect on a high sensitive cultural receptor. This should be deemed significant in EIAR terms, and therefore mitigation is required. The current conclusion does not state this and is unacceptable in this regard.

Mitigation ought to be proposed for this specific impact. The removal, or relocation, of the most impactful of the turbines in terms of the visual setting of the Lemanaghan Monastic complex ought to be requested.

Conclusion

There is in principle Heritage Council support for renewable energy as the most desired form of energy. However, we are keen to ensure that such developments, if in peatlands earmarked for restoration, are the most prudent course of action for ecological and climate objectives. This is particularly important given the expected responsibility that state owned lands will have for the implementation of the National Nature Restoration Plan.

Equally, we believe that the assessment of impacts, including setting, on cultural heritage features are fully defensible to set important precedent going forward, given the expected increase in renewables. The assessment of significance needs to be robust, which is needed to justify appropriate mitigation. In this case, we believe mitigation is required specifically for the Lemanaghan Monastic Complex.

We are cognisant of the requirements of the RED III Directive on the decision-making authority. We note that the scope of an EIAR cannot be extended, yet we contend that our points are method based in terms of the assessment as presented.

I trust these comments will aid An Comisiún Pleanála's determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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