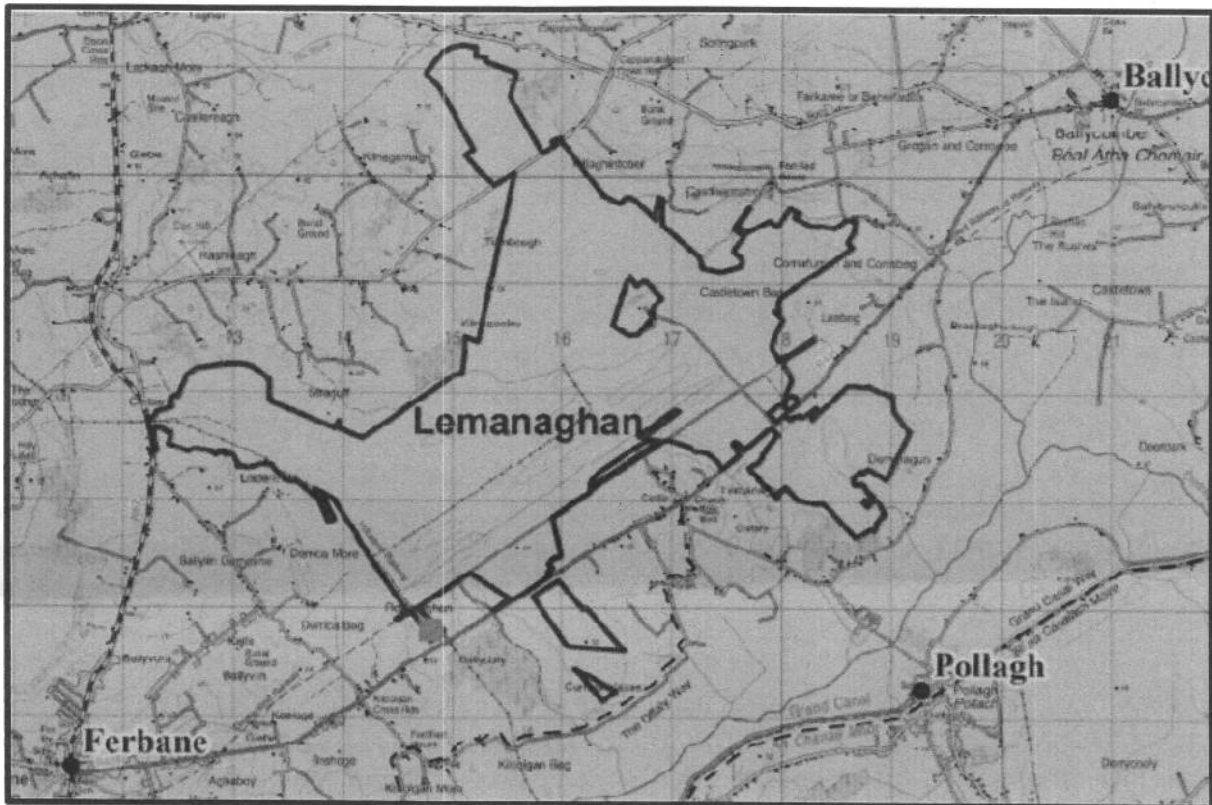


Dear Offaly County Council Forward Planning Department,

RE:MA443& MA436Offaly County Council: Proposed Material Alterations to the Draft Offaly County Development Plan 2021-2027

Please remove Lemnaghan Bog in its entirety from Area 5 (and amend the description of Area 5 to read as 'Area generally West of Doon'. Please delete Castletown bog from the list of townlands within this area) Ref MA436, as an area open to consideration to wind energy for the following reasons:



1. Chapter 4 of the Draft County Offaly Development Plan: Biodiversity and Landscape, Page numbered 133, which identifies Lemnaghan as ***"highly sensitive to new developments, which could potentially damage the historical character and the cultural and social importance of the area."***

Stating that *"The Council shall endeavour to ensure that planning applications for development, refurbishment and restoration works etc. within close proximity to these areas are sympathetic to the sensitive nature of the landscape. Acceptability of development for consideration: Very limited development subject to appropriateness /conditions. Need for Landscaping and Appropriate Design: Essential"*

Needless to point out that mapping wind turbines as open to consideration in an area that in the same county development plan is specifying "Very limited development" is contradictory and no amount of landscaping could mitigate against the visual impact of wind turbines on the horizon.

2. The 'protected zone' in the material alterations was created without a site survey and with **no specialist archaeological or historical expertise**. Many recorded National Monuments in the bog were not afforded any protection in this amendment.....MA443

¹Raftery, B. and Hickey, J. (eds) 2001. *Recent Developments in Wetland Research*. Seandálaíocht: Mon 2, Dept Archaeol, UCD and WARP Occ. Paper 14. Dublin:

3. **The Lemanaghan Conservation Plan**, published by the Heritage Council which was sponsored by Offaly County Council developed a plan to protect the area. The following are some extracts from the conservation plan:
 - **Executive Summary:** A key point of this document is that it was created to ensure *"Policies are set out for the care and management of the historic place within its setting....Provide a framework for decision-making on future developments to infrastructure and land use."*
 - **Section 5.4:** Proper Understanding of the place: *"Lemanaghan has been recognised only at local and specialist levels.....thus care will be required to identify potential archaeology in any future developments"*
 - **Section 5.6:** Land Use: it specifically states that *"It is important that the options considered for the post-industrial use of the bog are sympathetic to the significance of the site"*
 - **Section 4:** Statement of Significance: *"Lemanaghan is a sacred place of great antiquity. The site was an important centre of Christian worship throughout the Middle Ages. There is also evidence to suggest that it may have provided a focus for pagan ritual before the establishment of the monastery. The place retains a sense of peace and tranquillity and is relatively untouched by modern life."*
4. Enormous records of archaeology have been recorded in Lemanaghan Bog, research by Rafferty and Hickey¹ states that *"Lemanaghan is located towards the northwest of the county and was surveyed between 1993 and 1997. The area is located north of the River Brosna and takes its name from a large island of dryland located at the centre of the region. BordnaMóna exploits 1,200ha of bog at Lemanaghan, which is part of a larger area of wetlands in the region. The IAWU surveys identified over 630 archaeological sites making this one of the highest densities of wetland archaeology in the world. Figure 3 shows the distribution of known archaeological sites in the Lemanaghan complex where 50 primarily Early Medieval dryland sites are known, compared with over 1,100 sightings of archaeological material in the peatlands representing the 715 sites."* Zoning the area for wind energy would be risky to the preservation of existing and other potential archaeological finds in the bog.
5. The wildlife, biodiversity, and threat of Irish Birds in decline needs to be carefully managed. The hen harrier, Whooper swans, Meadow pipit, a Red-listed species, occurs widely on site, along with various Amber listed species including kestrel, sparrowhawk, snipe, skylark, stonechat and linnet. Also, woodcock (Red-listed) has been recorded in the Lemanaghan Bog. Additionally the Blackheaded Gull, Swallows, Buzzards, along with mammals such as Bats, Red Squirrels, Badgers, Irish Hares, Otters, Mink, Pine Martins, Foxes and Rabbits have all been seen on site. Lemanaghan bog is home to an array of insects and spectacular butterflies, frogs and lizards. Filling the bog with large cement foundations for wind turbines will be detrimental to these creatures. Lemanaghan is home to beautiful flora and a wide variety of wildflowers which the bees pollinate— it is a special place of biodiversity and needs to be conserved.
6. MA431 on page 276 and 277 indicate that Lemanaghan Bog is **Medium Sensitive** in relation to Landscape sensitivity.
7. An eco-tourism plan would be welcome development for the area, using the ancient pilgrim path the SilMor, to link to St. Manchans Shrine in Boher and to Clonmacnoise, which has the second highest visitor numbers in Ireland.

Thank you for your consideration,

¹Rafferty, B. and Hickey, J. (eds) 2001. *Recent Developments in Wetland Research*. Seandálaíocht: Mon 2, Dept Archaeol, UCD and WARP Occ. Paper 14. Dublin: