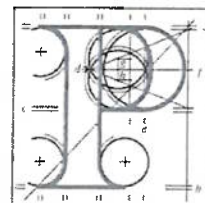


Our Case Number: ABP-317809-23



**An
Bord
Pleanála**

Ciara Moore and others
Knockahonagh
Luggacurran
Portlaoise
Co. Laois

Date: 12 October 2023

Re: Proposed Coolglass windfarm and related works
In the townlands of Fossy Upper, Aghoney, Gorreelagh, Knocklead, Scotland, Brennanshill,
Monamantry, Coolglass, Crissard and Kylenabehy, Co. Laois.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned officer of the Board or email sids@pleanala.ie quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,



Evan McGuigan
Executive Officer
Direct Line:

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1st October 2023

Case Reference: PA[11.317809](#)

Development address; the townlands of Fossy Upper, Aghoney, Gorreelagh, Knocklead, Scotland, Brennanshill, Monamanry, Coolglass, Crissard and Kylenabehy, Co. Laois.

Proposed Coolglass Windfarm and related works

Dear Sir/Madam,

We are a local Indigenous Irish Sprituality practioner group "An Daoine Draíocht" who come together regularly to gather in ceremony at the prehistoric heritage site The Druids Altar in the townland of Monamanry and surrounding Cultural and Biodiverse Heritage sites in the Wolfhill, Lugacurren Timahoe and The Swan areas since 2021 as a group, but indivually for nearly twenty years. Cultural heritage, archaeological heritage, and architectural heritage are places and

objects of beauty, cultural, historic, scientific, social or spiritual value. They include archaeological monuments, world heritage sites, protected structures, designed landscapes, place names, language and inherited traditions.

We established a group of Indigenous Irish Sprituality practitioners to gather to celebrate our cultural heritage and mutual connection with the local area. We believe that the site is as significant as Uisneach and The Loughcrew Cairns. We feel that the importance of safeguarding the site and protecting and preserving it so it can be enjoyed for future generations. We visit different sites in the area to acknowledge our heritage and learn more about those sites and their history. We use the Fossey mountain trail to watch sunsets and visit an old Hawthorn tree in Kyle. Walking in nature has allowed us to gain valuable understanding of the area and it's wildlife, flora and fauna and it's heritage. Which is plentiful.

As is stated in the application, There are ten known prehistoric cultural heritage assets within 1km of the Proposed Development Site.

There are two prehistoric cultural heritage assets located alongside one another to the east Of the Proposed Development Site. LA[025-013](#) is a megalithic structure, comprising a sub-Circular mound with a small kerb, set stones, and a hollow with an embedded slab. The asset is located 1km east of the Proposed Development Site and c. 0.25km northeast of access track. The Druids Altar is a site of worship and to celebrate solstice and equinoxes as a marking of the turning of the year. The site is prehistoric and culturally significant. The fact that it is referenced in earliest maps as "The Druids Altar" in itself cements the notion of a sacred site. The site is also known locally as The Plateau of the Druidessess.

Assessments of effects on cultural heritage assets must also include consideration of effects on the wider cultural heritage landscapes, within which those assets are located – their “setting”. Also it is noteworthy in Chapter 5 Of application that LCC stated there was “no detail of protected structures as per Appendix 1 of LCC development plan [2021-2027](#)” in the scoping report.

‘Archaeology’ ‘is the study of past societies through the material remains left by those societies and the evidence of their environment. The ‘archaeological heritage’ consists of such material remains (whether in the form of sites and monuments or artefacts in the sense of moveable objects) and environmental evidence’

Section 2 of the National Monuments Acts 1930 (as amended) provides that ‘monument’ includes the following (whether above or below the surface of the ground or the water and whether affixed or not affixed to the ground):

- ‘(a) any artificial or partly artificial building, structure or erection or group of such buildings, structures or erections,
- (b) any cave, stone or other natural product, whether or not forming part of the ground, that has been artificially carved, sculptured or worked upon or which (where it does not form part of the place where it is) appears to have been purposely put or arranged in position,
- (c) any, or any part of any, prehistoric or ancient-
 - (i) tomb, grave or burial deposit, or
 - (ii) ritual, industrial or habitation site, and
 - (iii) any place comprising the remains or traces of any such building, structure or erection, any such cave, stone or natural product or any such tomb, grave, burial deposit or ritual, industrial or habitation site, situated on land or in the territorial waters of the State’

The view from the site of The Druids Altar towards seven counties is spectacular with views to the Hill of Allen, The Dublin and Wicklow mountains and everything in between is incredible on a clear day and should be considered by An Bord Pleanála as a viable ground for refusal in itself. If the Heritage section of the application had included a site visit the developers would have noted its significance. The Druids Altar is in direct alignment with Loughcrew Cairns to the North, and the cycle of the solstice and equinoxes. Having turbines within 1 km west of the site could cause indirect effects on the setting summer solstice solar alignment. We use the site as a place of worship and want to refer An Bord Pleanála to the guidelines for windfarms regarding Noise Sensitivity Receptors. Noise Assessment of Wind Turbine Operations at EPA Licensed Sites (NG3) 4.2 Noise Sensitive Locations Noise sensitive locations (NSLs) are deemed to be any location in which the inhabitants can be disturbed by noise from the site (including turbine noise). This incorporates the previous definition for a NSL provided in the previous agency guidance notes which also covers the definition for a

NSLvii provided in the Department of the Environment, Heritage and Local Government's (DoEHLG's) 2006 guidance document „WindFarm Planning Guidelines“.

Guidance Note on Noise Assessment of Wind Turbine Operations at EPA Licensed Sites (NG3)4.2

vi Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment or any other facility or other area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels

vii Includes any occupied dwelling house, hostel, health building or place of worship and may include areas of particular scenic quality or special recreational amenity importance

As a group of Indigenous Irish Spirituality practitioners, we refer An Bord Pleanála to the following:

In December 2015 Ireland ratified the UNESCO 2003 Convention for the Safeguarding of the Intangible Cultural Heritage The Convention speaks about communities and groups of tradition-bearers in a non-specific way. The spirit of the Convention is such that communities should be seen as having an open character, not necessarily linked to specific territories. Their central role in the implementation of the Convention is already included in the definition provided in Article 2.1 of intangible cultural heritage. Articles 11, 13 and 15 of the Convention provide, among other things, that States Parties are required to take the necessary measures to ensure the safeguarding of the intangible cultural heritage present in their territory and to include communities, groups and relevant NGOs in the identification and definition of elements of that intangible heritage. They shall endeavour to ensure the widest possible participation of communities, groups and individuals that create, maintain and transmit intangible cultural heritage within the framework of their safeguarding activities and actively involve them in its management

<https://ich.unesco.org/en/involvement-of-communities-0003>

In Chapter 11. Of the development application 11.2.1 it states

"Indirect effects on the significance of cultural heritage assets have been identified and assessed with reference to the EPA Guidelines (2022). The assessment has been carried out in the following stages:

initial assessment of intervisibility and other factors leading to the identification of potentially affected assets;

assessment of the cultural heritage significance of potentially affected assets;

assessment of the contribution of the setting to the cultural heritage significance of those assets;

assessment of the magnitude of the impact of the Proposed Development Site on the contribution of settings to the significance of assets (by causing change within

those settings); and
prediction of the significance of the effect. "

We would argue that this assessment had it included a site visit would have been conclusive that it was a valuable cultural significant site with unique setting and views to seven counties. Had meaningful community engagement occurred members of the group would have raised concerns. Undeniably indirect effects will occur adverse change to the setting of The Druids Altar

both visually, and as a result of noise, vibration, traffic movements etc.

We question the validity of the archeologist report from SLR for the Statkraft application, incorrect information, cultural heritage' sites overlooked, lack of local knowledge and incomplete labeling in maps provided is noted in the report which would greatly diminish the findings of the archeologist for example, we refer An Bord Pleanála to chapter 11

"11.3.2.6 Historic Mapping A review of the Down Survey of Ireland data was undertaken, using the information made available by the University of Dublin. The Proposed Development Site is not specifically noted within the online mapping. However, the supplemental information tells us that the northern part of the Proposed Development Site, the townland of Fossy Upper, sits within the Barony of Cullenagh and the Parish of Fossy, with the rest sitting within the Barony of Ballyadams and the parish of Killebban. The 1659 census shows that Fossy Upper had 15 inhabitants, all of whom were English"

This is an error, on page 499 of The Census of Ireland 1659 Queens County The Barony of Cullenagh, the parish of Fossey it clearly states 0 English and 15 Irish inhabitants. We would even question why this information would be relevant in any way to this report. We also see that the data was accessed in one day. Given the significance of the area in terms of heritage and the visual impact of these turbines we feel more diligence and time was needed to fully assess the direct and indirect effects. Indeed a site visit wasn't even carried out as per Wind energy best practice guidelines

"An archaeologist will normally carry out a field survey, and prepare an archaeological impact report. Other aspects of cultural heritage should also be assessed in the EIS, including architectural heritage and places of spiritual, traditional, or local importance."

No field survey was carried out. It is noted that the report only references The Dun of Lugacurren. However it fails to mention The Dun of Clopook just a few hundred meters away from The Dun of Lugacurren. The Dun of Clopook is the most culturally significant archeological heritage site in the area and perhaps in Laois. The Dún of Clopook is located approximately 2.5km from the proposed windfarm site. This highly significant Class II Hillfort heritage site is a prominent limestone hill rising above the valley and was created during the Tertiary period (6.5-2.8 million years ago) . Also known as Cloch an Phúca or the Stone of the Phúca. As the title suggests the word Dún is associated with a fort. Believed to be built during the transitional period between the Bronze and Iron ages (2000-3000 years ago) The cave located at the Dun is associated with St. Fiacc, abbot and bishop of Sleaty, Co. Laois. who is said to have had a lenten retreat in the cave. In the 1880s a ploughman found remains

and artefacts under a cist associated with the bronze age. The significance of this historical site surely should have been referenced in the application, considering it's historical impact and potential tourism that the heritage site provides. It also has mythological significance, folklore and local history associates the Dun with ancient mythology for example :

" There is a cave under Dún-of-Clopook. O'Byrne says there is a spirit or phooka in this cave, which frequently presented itself in the form of a fleece of wool, which issued from the cave, roamed over the fields with astonishing celerity, Its motions were accompanied by a buzzing sound. In the neighbourhood, he says, a battle was fought between two hosts of the Sidhe (the ancient race of people who lived in Tir na nog), and the bushes and hawthorn trees were smashed and trampled and specked with blood. About 1830, numbers of horsemen were seen on the top of this dun. They galloped wildly round, and leaped several times down the precipitous sides. On the north side of the Dún Luggacurran there was a cave. O'Byrne states that at night the music of bagpipes is often to be heard coming from this cave Folklore recorded by Helen Roe. From Midlands History.ie.

The mythological reference is also found in The Killkenny Archeological society "Old Killkenny review" page 26

"I found in Leinster the amooth and steek, From Dublin to Slieve Margys 's peak Flourishing pastures, valour, health..

It will be noticed here that Slew Margy is considered to be on the boundary of Leinster Le. between Leinster and Munster Ballinalacken on Cromwell's road commands a very striking view of the Upper Valley of the Nore-the Magh Airgid Ros (Plain of the Land of Silver). At the North-East corner of the Plateau is the isolated hill called Doon of Clopook (Dun Cloch A' Phuca-Pooka: Stone Fort) anciently called Sliabh Legh (Lugh was ancestor god of the Firbolg). The nearby dolmen-topped Brennan's Hill and cave of Lugacurren..."

In Laois folk tales there is also reference to the mythological significance of the area

"The story of the birth of Oisín is one of my favourite stories. I have told it for many years without realising that it has strong connections with ancient districts in County Laois, Killeslin and Sleatty. Killeslin was once Cill or Gleann Ossian, or Oisín, in the Irish language. Sleatty is in Sliabh Mairghe, the Slieve Margy Mountains, which overlook the huge plains of Leinster across to the highest peaks of the Wicklow Mountains and southwards towards Mount Leinster in County Wexford. Fionn MacCumhaill himself, they say, was born in these mountains and fostered by his aunt Bobal Bendrond, the Druidess wife of Cucend of Teamhar Mairge." Laois Folktales by Nuala Hayes.

Included in the "Transactions of the Killkenny Archeological society" in an article entitled "On the Duns of Cloch-an-phuca and Log -an- chobain. By Mr. Daniel Byrne pg 298 is a reference to the significance of The Dun of Clopook

" It consists of a partially isolated rock, standing out from a range of hills on the north east side of the valley and was probably at an early age occupied as one of the chief fortresses of

the O 'Mores, perhaps indeed a royal residence "

The development of a windfarm in such a rich culturally significant and prehistoric heritage area would be a decision with dire consequences on the intangible cultural heritage and archeological significance of the unique character and landscape of the area and surrounds. Our future generations should be able to experience this site as we do now and as it has been done for millennium before.

Members of our group and other Indigenous Irish Sprituality practitioner groups and individuals should be consulted on decisions and possible indirect effects of sacred sites as Complementary to the 2003 Convention for the Safeguarding of the Intangible Cultural Heritage, the Operational Directives for the Implementation of the Convention and national legislative frameworks, these Ethical Principles are intended to serve as basis for the development of specific codes of ethics and tools adapted to local and sectoral conditions.

1. Communities, groups and, where applicable, individuals should have the primary role in safeguarding their own intangible cultural heritage.
2. The right of communities, groups and, where applicable, individuals to continue the practices, representations, expressions, knowledge and skills necessary to ensure the viability of the intangible cultural heritage should be recognized and respected.

2.2.2 European Protection of Heritage Assets

The importance of protecting the setting of heritage assets is recognised by a number of international conventions and instruments. The 'Valletta and Granada' Council of Europe conventions place legal obligations on Member States in relation to recording, conservation and management of archaeological and built heritage. In essence these conventions prescribe that heritage is conserved and maintained preferably in-situ and that archaeological and architectural heritage concerns are integrated into the planning and development process, for example through the Environmental Impact Assessment process.

In Ireland these conventions are given effect through the National Monuments Acts 1930-2012, and the Planning and Development Act 2000 and its amendments.

The Valetta Convention requires the State 'to ensure that environmental impact assessments and the resulting decisions involve full consideration of archaeological sites and their settings'.

The Granada Convention requires that 'In the surroundings of monuments, within groups of buildings and within sites, each Party undertakes to promote measures for the general enhancement of the environment'.

The European Landscape Convention promotes landscape as a primary aspect of heritage and defines landscape as 'an area, as perceived by people, whose character is the result of the action and interaction of natural and /or human factors'.

The use of historic landscape characterisation (HLC) as a mechanism for large scale heritage management has been adopted by many European countries Including Ireland

The Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas

(ICOMOS 2005) is the only international instrument dedicated to setting.

Irish wind energy best practice guidelines:

6.3.9. Impacts on Cultural Heritage

The term cultural heritage as used in these guidelines includes archaeology, architectural and cultural heritage.

Potential impacts on cultural heritage

The most significant potential impacts on cultural heritage will include the following:

- disturbance or destruction of sites of archaeological interest
- visual impact on sites of significant archaeological interest
- visual impact on sites of architectural heritage or cultural significance

Current best practice

"An archaeologist will normally carry out a field survey, and prepare an archaeological impact report. Other aspects of cultural heritage should also be assessed in the EIS, including architectural heritage and places of spiritual, traditional, or local importance. Consultation with the Heritage Officer or planning authority as well as the Development Applications Unit of the DoAHG as part of the EIS scoping should confirm the requirements for any particular development. It is also recommended in relation to the visual impact on cultural heritage sites, that the archaeologist liaise with those undertaking the landscape and visual impact assessment to adequately address these issues. Cognisance should also be given to the ICOMOS publication dealing specifically with Heritage Impact Assessment⁵².

Cumulative impacts on cultural heritage

Potential cumulative impacts associated with existing and permitted significant infrastructure within the wider area should be assessed. It is likely that these will mostly relate to visual impacts"

We also refer An Bord Pleanála to The Aarhus Convention and community engagement required in planning and securing their consent for projects in their community.

"Public Participation is required from the 'concerned public' when activities affecting specific Groups or individuals are being carried out, such as plans for construction" (Article 6 of the Aarhus Convention).

We respectfully urge that planning permission for this development be refused.

I enclose 50 Euro in respect of this objection.

All correspondence in this matter can be sent to
me at:

Address:

Knockahonagh, Luggacurran, Portlaoise.

Co.Laois. _____

Yours sincerely,

Ciara Moore

Ciara Moore

on behalf of

Sinead Delaney

Edel Mottagh

Melanie Dunne

Kiara Geoghegan

Seán Hearn

Colma O'Neill

Lorcan Turner

Kevin McGuill

Rachel Henry