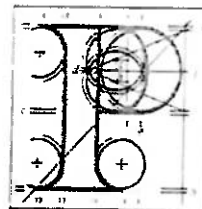


Our Case Number: ABP-317809-23

Planning Authority Reference Number:



An
Bord
Pleanála

Sinead Delaney
Grissard
Wolfhill
Athy
Co. Laois
R14HW74

Date: 09 October 2023

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

PA04

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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An Bord Pleanála

64 Marlborough Street

Rotunda

Dublin 1

D01 V902

AN BORD PLEANÁLA	
LDG-	066983-23
ABP-	
04 OCT 2023	
Fee: €	50
Type:	Cash
Time:	
By:	hand

1st October 2023

Case Reference: PA11.317809

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

Proposed Coolglass Windfarm and related works.

Dear Sir/Madam,

SINEAD DELANEY

write in connection with the above listed planning application. As a local resident I wish to object to the proposed development by Statkraft. Listed below are some of my summarised observations and concerns in particular regarding sacred space, health, heritage biodiversity and community engagement. I object to the construction of the windfarm for the following reasons:

This report places little value on the safeguarding of the intangible cultural heritage site of The Druids Altar in the townland of Monamanry and it's importance to a section of our population in terms of culture, spirituality, and history. The Convention below has been signed by the Irish Government, and this proposed development is a direct threat to that cultural heritage and our right to access it without the undue interference of wind turbines.

In December 2015 Ireland ratified the UNESCO 2003 Convention for the Safeguarding of the Intangible Cultural Heritage. Intangible cultural heritage 'refers to the practices, representations, expressions, knowledge, skills - as well as the instruments, objects, artefacts and cultural spaces associated therewith - that communities, groups and, in some cases, individuals recognise as part of their cultural heritage'

1. Intangible Cultural Heritage

The location of the site beside the sacred site of The Druids Altar in the townland of Monamany. As a practitioner of Indigenous Irish Spirituality I consider The Druids Altar a sacred site. Indeed the name and location itself solidifies the tradition of and continued use of the site as a sacred or 'sacral' site. It is also known locally as The Plateau of the Druidessess. I have been visiting the site alone and in groups for nearly twenty years, marking the turning of the year by celebrating solstices and equinoxes and occasional full moons, through ceremonies and peaceful worship. The view across seven counties is breathtaking and here I connect with the land, the ancestors, other intangible cultural heritage significant sites like The Hill of Allen and the Wicklow Mountains, and the native wildlife, this is the essence of my Indigenous Irish practice. Connection with the site and the land is an essential part of my practice, it's a place of worship, just like Catholic members of the community would go to church. The land is my church. Without this connection to my home and area it would feel soulless, devoid of my roots and less grounded.

Another aspect of my Indigenous practice is to pass on my knowledge, practice and history to future generations especially my own children and future grandchildren. The construction and operation of the windfarm will not allow my children and future generations to experience the sacred site as I do now and indeed as my ancestors did for millennium before us. Being unable to do so would be non compliance with the UNESCO Convention for the Safeguarding of intangible cultural heritage in particular

Article 13: Other measures for safeguarding To ensure the safeguarding, development and promotion of the intangible cultural heritage present in its territory, each State Party shall endeavour to:

(a) adopt a general policy aimed at promoting the function of the intangible cultural heritage in society, and at integrating the safeguarding of such heritage into planning programmes , and

Article 14: Education, awareness-raising and capacity-building Each State Party shall endeavour, by all appropriate means, to:

a. iv) non-formal means of transmitting knowledge;

(c) promote education for the protection of natural spaces and places of memory whose existence is necessary for expressing 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-00033>

Myself and many others use this sacred site as a place of worship. A place to sit in peace and tranquility. If a meaning community consultation and engagement had occurred, the developers would have known and been able to determine it as a Noise Sensitivity Receptors.

As it is the development of constructed is in non compliance of the guidelines for Noise assessment of wind turbine operations at EPA licenced sites. 4.2 vi. And vii. *Guidance Note on 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 NSLvi 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 „Wind Farm Planning Guidelines“.*

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

2. Health

Concerns regarding noise and shadow flicker. The proposal, considering the height and enormity of the turbines seems premature, with such massive structures and outdated guidelines surely it's preferably to wait until such time as the government agree on appropriate noise limits and standards from wind farms. As a parent of a child with [REDACTED]

[REDACTED] I have grave concerns regarding my child's ability to live peacefully and without [REDACTED] in our own home which is within 1 km of the proposed site. When my child experience [REDACTED] for example excess noise or light [REDACTED]

[REDACTED] This creates difficulties sleeping and effects learning at school. Individuals with sensory issues hear sound and frequencies that are inaudible to most neurotypical people. Neurotypical refers to non-autistic people's normality and implies their tendency to impose their understanding of

normality on everyone else as correct and natural. Aural diversity is a relevant topic. Standards exist for the average neurotypical person however It is well-documented that children's and animals hearing is much more acute than adults and they hear at different frequency for example when we hear about Anti-loitering Devices that are audible to children and teenagers to deter them from loitering in certain areas and rodent prevention devices. "Apart from cognitive abilities, there are some basic physiological differences such as the size of the auditory canal, which, for infants and children, resonate at much high frequencies than for adults. The high-speed dryer also generates a lot of high-frequency sound due to massive air turbulence; thus the problem for kids is compounded." (Aural diversity in Acoustic regulations and practice :The hand dryer noise story" by John Denver, Goldsmiths, University of London, Department of Music, London pg4.

If there is a zero flicker policy then why does the application have a section Chapter 14 on shadow flicker and what homes it will effect?

The individual needs of my household can't be pertained to averages and general statistics, the needs of one home can greatly differ from another.

Can this company give working examples of other windfarms that have zero flicker policy? Vibrations arising from the construction phase could undermine the structural integrity of buildings in the vicinity including homes and protected structures and monuments in the area. Noise emissions and shadow flicker will devastate the residential amenity of the majority of people living in the vicinity merely to benefit a few landowners in financial terms.

3. Biodiversity

We have rich and plentiful biodiversity in the community. Buzzards and Ravens are spotted daily in and around the site. In my own garden in the 1km zone is full of activity and I am lucky to have a Common kestrel nest in the tree in my garden this year (2023). In previous years a family of Ravens roost on the RTE mast across the road from my home also within 1km of the proposed site. On occasion in the past few years I have seen a red squirrel, a pine marten and a fox in the garden. Barn owls have also been seen in the area.

In 2019, 85 per cent of Ireland's protected habitats were in unfavourable condition and one in five species in the country are threatened with extinction. Surely it is imperative that we protect this area and the species listed in the application and from many sightings from the local community instead of destroying their habitat with a windfarm site that would be less detrimental on our native species if it was constructed in a more suitable area. The loss of habitat during construction will be detrimental to the area, the pouring of tonnes of concrete for foundations and the removal of habitat for cable routes will be a loss of such rich biodiversity.

4. Visual Impact.

The site proposed is on land which has a high landscape sensitivity and may result in a detrimental visual impact. The cumulative effect of other windfarms in the area would have dire consequences in the locality and give rise to a proliferation of wind turbines at this

location which would negatively alter the character of this rural landscape effectively turning it into a Plateau of windfarms.

5. Dehumanization

The application constantly refers to homes within the community as "residential receptors". This is arguably an attempt to dehumanize members of the community, thus eliminating the humanity aspect of the community. Myself and my family have a home here, we are part of a community. The location is a community with homes in which live different families with different circumstances, generations living together, people living alone, different religions, ethnicity and multicultural homes that together make up our community. In an article on the very topic "Dehumanization in organizational settings: some scientific and ethical considerations" the author Kalina Christoff writes "Dehumanizing those about whom we are making a moral decision would of course eliminate the moral elements of the decision making process (and therefore make it "easier" for the decision maker), but it should also raise some serious ethical concerns. A much more constructive and ethically acceptable way to ease the burden of such difficult moral decisions would be to relieve the person in power of the decision making responsibility and to place it where it rightfully belongs: with the person who will bear the greatest consequences of the decision." Article can be found here.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4173804/>

6. Areas of sensitivity

In Chapter 10 of the application Noise sensitivity receptors are mentioned:

"NSRs are properties within the study area which are potentially sensitive to noise and, as such, may require protection from nearby noise sources. The 2006 Guidelines lists NSRs as dwellings, hostels, health buildings, places of worship and may also include areas of particular scenic quality or specially recreational amenity importance. The NSRs identified within this assessment are all residential properties and wind turbine noise immission levels are predicted to a location representative of each outdoor amenity area rather the façade of the property. This is in line with the IOA GPG which states (at paragraph 4.3.8) that "calculations should be made at points representative of the relevant outdoor amenity area (as defined in ETSU-R-97) at locations nearest to the proposed wind farm" But failed to add note regarding educational premises

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 NSLvi 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 „Wind Farm Planning Guidelines“.

Guidance Note on Noise Assessment of Wind Turbine Operations at EPA Licensed Sites

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.

In Chapter 5 of the application section 5. 4. 2 it's stated, "A site visit was undertaken to inform this chapter in November of 2021. A follow-up site visit was undertaken in May 2022 and November 2022 and changes to the area have been noted and included where relevant. The Study Area the site visit comprised was a 2km radius from the Site to identify sensitive receptors (hospitals, community facilities, schools) and other receptors such as telecommunications masts, amenities, recreation trails, tourism areas and to identify socio-economic considerations in the area such as visible agriculture, minerals, manufacturing and service industry. Additionally, the settlements of Timahoe, Swan and Wolfhill were investigated to ascertain what sensitive and other receptors were present within each" as per guidelines this would include places of worship St Marys church Wolfhill, St Michael's church Timahoe and The Druids Altar in Monamanny. Timahoe is an Architectural Conservation Area in the wind energy guidelines chapter 5 it's stated. PLANNING LEGISLATION AND REQUIREMENTS Irish Planning Legislation Pertaining to Wind Turbines 11. The turbine should not be located within an architectural conservation area.

Schools are also considered as NSRs although that is not stated in the application. Wolfhill National School is also within the 1km zone of the proposed development and has been failed to be mentioned in the application. The Swam and Timahoe National schools are also within the area. Timahoe NS has just acquired an autism unit. Schools are NSRs, shadow flicker, noise and increased construction traffic would be disruptive to pupils and staff. Children with sensory issues would be effected even further. Effects of dust in construction would be worrisome. Risk if turbine malfunction would be a further danger, has the application addressed these concerns? Has the Department of Education been informed of this proposal?

Freedom of worship in the Catholic Church. St Marys church Wolfhill is a Catholic church within 1 km of the proposed site. St Michael's Church Timahoe and The Holy Rosary Church Lugacurren are also in the area. Burials take place in the graveyard beside St Marys church. A windfarm there would have major impact with noise and visual effect at this most sensitive time and visiting family and loved ones graves would also be effected. Many friends in the community go to the church to pray in peace. This development would have an impact on the churchgoers of the community.

7. Community engagement and consultation.

Public participation is required from 'the public' for the development of plans, programmes and policies relating to the environment. This includes issues such as climate policy (Article 7

of the Aarhus Convention). As a resident within the 1km zone of the site no door to door consultation was carried out at my home, a glossy brochure was left at the door. I filled the community consultation section yet no attempt was made to engage with me afterwards to discuss my concerns. Myself and local group of concerned residents organised two community meetings to discuss the proposed windfarm, all were welcome, we distributed flyers throughout the locality and engaged with the community door to door. Many were surprised that they didn't receive a brochure or were even aware of the proposal. This isn't meaningful community engagement and a website as community engagement is not easily accessible to everybody, most elderly people don't have access to the internet. We've just received fiber optic broadband in the area, after the initial distribution of brochures by Statkraft.

8. Local Road Network

Local roads and their inability to have an increase of construction traffic and their effect on local walking groups and clubs. Local roads are not equipped to deal with construction traffic, as witnessed by the community when the Ploughing championship construction traffic used local roads. Most local roads have grass in the middle and are narrow and twisty.

9. Heritage

No site visit was conducted by SLR. Given the heritage and archeological significance of the area which includes over eighty archeological sites within the 5km zone of the proposed site and the presence of eight National Architectural sites also within in the 5km zone of the proposed site, as well as dozens more significant archeological areas within the 10km zone of the proposed development. This surely would require a site visit, as per guidelines set out by the Department of Housing, Local government and Heritage 2019. 5.5 wind energy guidelines.

The report states "There are 10 known prehistoric cultural heritage sites within the 1km buffer zone, comprising one megalithic structure, two barrows, and seven Fulacht fia (burnt mounds). The majority of the Fulacht fia are noted as no longer existing, with no visible surface remains, mainly due to damage during agricultural land use. The presence of these prehistoric cultural heritage assets within the 1km buffer is suggestive of localised prehistoric activity." Such cultural significant and ancient sites should be considered extremely important to our area and safeguarding it's future should be of utmost importance for future generations. Even though no visible surface remains for such important archeological sites, their significance and potential for further archeological remains to be found cannot be ruled out as raised by An Bord Pleanála in the preapplication meeting. SLR themselves say in the report "However, no site visit was carried out as part of this assessment and as such, their presence cannot be entirely ruled out" The conservation of sites whether visible or not is mentioned in

*European Convention on the Protection of the Archaeological Heritage (Revised) *Valette, 16.1.1992*

Identification of the heritage and measures for protection

Article 2.

Each Party undertakes to institute, by means appropriate to the State in question, a legal system for the protection of the archaeological heritage, making provision for:

ii.the creation of archaeological reserves, even where there are no visible remains on the ground or under water, for the preservation of material evidence to be studied by later generations;

The Druids Altar in the townland on Monamanry Is a megalithic structure at Monamanry, 'Móin na Manraí' – 'the bog(land) of the enclosure, paddock / bog of the mangers' (LA025-013) is marked on the OS map and the Historic maps as 'Druids' Altar' It is a circular mound 9m to 10m in diameter and 0.75m in maximum height. A kerb of small stones survives around almost all of the circumference but are somewhat concealed in the ground at the west. Two set stones, about 1m inside the kerb in the NE quadrant, indicate an inner kerb and there is a hollow measuring 3.50m in length and 2m in width at the centre of the mound where a slab, Aligned NW-SE, 1.2m in length and 0.80m in width, lying slightly elevated above the ground which may be the roof of a tomb. In their book, 'History of Queen's County', Ó'Hanlon & O'Leary give a brief mention of the Monamanry structure. They wrote that 'in the town-land of Monamanry and parish of Tullomoy, about a mile and a-quarter west from the Ass's Manger, there is a Dolmen marked Druids' Altar on the Ordnance Survey Town-land Map' (O'Hanlon & O'Leary, vol.1, p. 56). Borlase in 'The Dolmens of Ireland, Vol. 2', also gives a very brief mention of Monamanry. He wrote that 'in the Townland of Monamanry, and Parish of Tullomoy, a mile and a quarter W. of the Ass's Manger, is a dolmen marked Druids' Altar in Ord. Surv. Map No. 25' (Borlase, W., vol. 2 p.374). Descriptive remarks from the Ordnance Survey Parish Namebook dated 1838 stated that '...there is a druid's altar in the east portion, ancient druid's place of worship'. This megalithic structure is still used today as a sacred site or sacral site. It is of highly significant cultural heritage and an intangible heritage site for locals, national and international visitors.

The Dún of Clopook is located approximately 2.5km from the proposed windfarm site. This highly significant Class II Hillfort heritage site isn't even referenced in the application report. A prominent limestone hill rises above the valley and was created during the Tertiary period (65-2.8 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, a well known and referenced story associates the Dun with Two Giants and the folklore of the pond

located at the foot of the Dun. The Dun of Clopook is a settlement of vast significance and importance in prehistoric Laois.

Timahoe is considered a cultural heritage town and is an Architectural Conservation Area consideration. Timahoe is highly cultural significant and includes an ecclesiastical complex, round tower and built and buried historic settlement remains. Preservation of the village would be of utmost importance and in accordance with Laois County Council Local Planning Policy and Development Control. Relevant Local Planning Policy is provided in the Laois County Development Plan 2021-2027 (adopted January 2022) aim is to protect, conserve and manage the archaeological and architectural cultural heritage of County Laois and to encourage sensitive sustainable development to ensure its survival and maintenance for future generations. It also highlights relevant policy objectives for archaeological cultural heritage and are as follows:

AH1: Manage development in a manner that protects and conserves the integrity and character of archaeological cultural heritage of the county which avoids adverse impacts on sites, monuments, settings, features or objects of significant historical or archaeological interest and secure the preservation in-situ or by record of all sites and features of historical and archaeological interest.' The proposed cable route for the windfarm would go directly through the village. Can the developer assure that this cable route will not effect the found and buried remains there within? The visual impact of the will be of high significance and directly impact the ambience and historical setting that Timahoe is known for locally, nationally and internationally. This proposal will directly effect the unique character of the area with its rolling hills and woodland surrounds.

A large number of archaeological sites will be indirectly and directly impacted by this development including above and buried archaeological significant sites, including Fossey Church, raths and moats and standing stones which are abundant in the area, many of which have been failed to be numbered on the map provided in the heritage section of the report. It is noted that data was accessed in one day by the developer, given the significance of the historical, archaeological and architectural value of the area a more thorough review and inspection would be anticipated. The significant site of an enclosure (LAO25-031) within the proposed development in Aghadreen hasn't been identified in the proposal or numbered on the map provided in the application. The enclosure although buried should also be given consideration and according to EU legislation European .

*Convention on the Protection of the Archaeological Heritage (Revised) * Valetta, 16.1.1992*

Identification of the heritage and measures for protection

Article 2

Each Party undertakes to institute, by means appropriate to the State in question, a legal system for the protection of the archaeological heritage, making provision for:

i. the maintenance of an inventory of its archaeological heritage and the designation of

protected monuments and areas;

ii .the creation of archaeological reserves, even where there are no visible remains on the ground or under water, for the preservation of material evidence to be studied by later generations; and

Integrated conservation of the archaeological heritage

Article 5

b, the allocation of sufficient time and resources for an appropriate scientific study to be made of the site and for its findings to be published;

iii .to ensure that environmental impact assessments and the resulting decisions involve full consideration of archaeological sites and their settings;.

It is also noted that Ireland is party to the UNESCO (United Nations Educational Scientific and Cultural Organisation) Convention Concerning the Protection of the World Cultural and Natural Heritage (the 'World Heritage Convention'). For the purposes of the World Heritage convention 'cultural heritage' includes Elements and structures of an archaeological nature and archaeological sites, which are of outstanding universal value. States Party to the Convention are required to endeavour (in so far as is possible and as appropriate for each country) to, inter alia,

- adopt a general policy which aims to give the cultural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes.

Also 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. Could this be why the report is so rushed and lacking in detail?

I 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:

GRISSARD, NOLEHILL VIA ATHY, CO. LADIS, R14H W74

Yours sincerely

