

ADDENDUM TO BE ATTACHED TO THE CHIEF EXECUTIVE'S REPORT IN RELATION TO THE LEAMANAGHAN WIND FARM APPLICATION, AN COIMISIUN PLEANALA CASE REFERENCE NUMBER PAX19. 324161

The members of Offaly County Council acknowledge the objectives of the County Climate Policy and the Government's objective to increase the supply of energy through sustainable methods including wind energy. Our County has contributed significantly towards achieving the country's wind energy targets and we support the policy of continuing to do so over the coming years. This commitment encompasses major projects in wind energy, solar and battery storage.

The Offaly County Development Plan 2011-2027 designated "areas deemed open for consideration for wind energy development" and the site in question in this application was one such area. The inclusion of this site was carried by a one vote margin. Considering the amount of wind farm development in the County meanwhile and the issues which relate to this particular site the Members now consider that this site should not be considered as an area suitable for consideration for wind energy development. Furthermore the Council also states that each application would be considered on a case by case basis.

Leamanaghan is an island of mineral soil in the midst of an expanse of peatland. The people living in this area have a strong attachment to the traditions and history of St. Manchan. The relationship between the Saint, the place and the people is witnessed by their attachment to St. Manchan's Shrine and the work they have carried out over many decades to maintain and improve access to the local sites and artefacts associated with St. Manchan. Features of the Leamanaghan site, whose significance spans the early Christian to Medieval period, include the Ancient Graveyard, Church Ruins, Toghar, Holy Well, Ballaun Stones and Oratory. It also includes a secluded area known as St. Mella's Cell, located in an area which is known locally as Kell; this includes an Enclosure and Oratory and a newly discovered Medieval Burial Site. This is located approximately 900 meters from the main road. People visit this site all year round to enjoy its serene and tranquil atmosphere.

The Heritage Council published a Conservation Plan for Leamanaghan in 2007 and a summary of their findings stated that Leamanaghan is 1) A sacred place of great antiquity 2) A place containing buildings of architectural significance 3) A place rich in documentary history and archaeological potential 4) A place where there is a long history of devotional practice 5) A place apart, possessing a strong sense of being untouched by the modern world.

Archaeological remains in Leamanaghan Bog date back over 5000 years. The harvesting of peat at the bog has led to an incredible number of archaeological discoveries, including numerous Toghers, which are ancient walkways across the bog. These Toghers have been dated by dendrochronology as dating back to the seventh century and are likely to have been walkways between Leamanaghan and Clonmacnoise. The plans for the construction of the wind farm will totally destroy this bog and all of the unique history which it holds. Also

found were several artefacts, one of the most impressive being an early medieval crosier which can be dated to the tenth or eleventh century.

The most famous of the traditions is the centuries old tradition where farmers historically refuse to sell milk. The ancient traditions and folklore are deeply woven into the local landscape and collective memories of the people of Leamanaghan. The traditions of this area showcase how the Medieval Christian heritage of this area blends with ancient Pagan roots, shaping a uniquely Irish spiritual identity.

The proposal to construct a wind farm on Leamanaghan Bog will significantly violate this special sacred location and permanently alter the whole essence of the area. The Photomontage 5a(VP5a) to CPA is seriously faulty and fails to address the enormous turbines' visual impact on the complex. The model used by the applicant does not consider the impact from the Holiest section of the complex, specifically St. Manchan's Holy Well, which attracts a large number of visitors every year. The Photomontage also does not address the visual influence of the gigantic turbines, 225 Meters in height, on the secluded area of the site known as St. Mellas Cell.

When visitors gaze across the bog to the north they can see St. Manchan's Church in Boher which houses St. Manchan's Shrine; this artefact is a remarkable example of early Irish metalwork and serves as a connection between Leamanaghan and Clonmacnoise, where it is believed to have been crafted. This Shrine also holds a significant importance as a relic, as it contains the bones of St. Manchan. The existence of the Shrine in the Parish demonstrates the ongoing dedication to the Saint, a devotion that may extend a thousand years. If the view of St. Mnachan's Church at Boher is blocked by the proposed massive wind turbines and ancillary buildings this will create a disconnection and disrupt a long standing tradition. Local people consider that the construction of the proposed wind farm would seriously interfere with an established religious practice and would be a violation of Article 10 of the European Charter of Fundamental Human Rights which relates to the rights to observe religious practice.

We recognise CAEO(Objective) 03 which states that "It is an objective of Offaly County Council to achieve a reasonable balance between responding to Government policy on renewable energy and in enabling the wind energy resources of the county to be harnessed in an environmentally sustainable manner". This balance must take account of many issues which arise in the area under consideration and all areas will vary in relation to impact.

We concur very strongly with the Chief Executive's submission which states "It is important for the Commission to note...with particular reference to the reasonable balance per CAEO-03. Offaly currently has 520MW of operational wind energy developments

300 MW has been energised since 2024

A further 85 MW is permitted and awaiting construction imminently

A further 247MW is currently in the planning system(including the current application) all SID applications to An Coimisiun

Combined, the above(inclusive of the requirements to omit a large portion within the current application) represents 9% of the entire country's Climate Action Plan/National Planning Framework 2030 wind energy target of 9,000MW.

Co. Offaly represents 2.3% of the country's landmass

An additional c.266MW is in the public domain at the pre planning stage"

This clearly demonstrates the commitment of Offaly Co. Council to achieve and even surpass the Government objectives in relation to wind generated energy. Any objections to the current application or amendments being sought are thus well founded and serve to achieve the "reasonable balance" referred to above.

The Members acknowledge the work being undertaken by the Leamanaghan Bog Heritage and Conservation Group and their concern that the construction of the wind farm will erode the significant archaeological and historical significance of the many features of the area. The following are some of the concerns which have been expressed by the group together with members of the local community.

- 1) Bord Na Mona continues to rely on a 2011 framework for the development of peatlands. This plan has excluded many areas as suitable for re-wetting and has targeted them as more suitable for wind farm development
- 2) Peatlands provide a unique carbon sink and when disturbed this carbon is released in contrast to the major mitigation opportunity if restored. The plans contained in the proposed development are for 15 wind turbines with a height of 220 meters. The foundation required for each turbine will be very significant, thus totally ravaging this bogland area resulting in a very significant carbon release. It will also destroy all of the significant archaeological history.
- 3) There has been a total focus on wind farms for the production of renewable energy. The potential for solar energy production could be much bigger than anticipated.
- 4) There is a huge potential for off-shore wind farms which could produce vastly more renewable energy than from a small wind farm in an area like Leamanaghan
- 5) Residents are very concerned about the potential health impacts of the proposed wind farm. Several complaints have been made to Offaly Co. Council by residents living close to the Stonestown Wind Farm in West Offaly; these complaints related to infrasound, noise pollution, sleep deprivation and shadow flicker. These issues remain for those residents and their properties have been seriously diminished. The residents in the area surrounding Leamanaghan are very concerned that the same issues are facing them if the wind farm is constructed. One clear example is the Special Needs Unit in the area which caters for children with Autism.
- 6) The residents are very concerned that there was no meaningful consultation with the residents in the area. The developers have presented documentation claiming that a structured consultation process took place but the residents claim that this was a contrived process.
- 7) The current guidelines for the construction of wind farms dates back to 2006. Revised guidelines were drafted in 2019 but have not yet been sanctioned by the Government. Offaly County Council have written to the Government on several occasions requesting the publication of new guidelines. The Climate Action Plan 2024 set out a timeline of quarter 1 2025 for the publication of the final updated guidelines but this has not happened.
- 8) The impact on nature and biodiversity will be significant. Since the cessation of peat harvesting the traditional flora and fauna have returned to these peatlands.

The return of birds such as the Hen Harrier and the Curlew has been very significant. It is estimated that eight bird species on the red danger list are located in this area.

The Offaly County Development Plan 2021-2027 contains very specific guidelines for the development of Peatlands. Section 13.9.12, DMS-108 states ; “ In the consideration of development on or adjacent to peatland areas, the following guiding principles should apply:

- Consideration of the potential contribution of peatlands to climate change mitigation ...”
- Consideration of habitats and species of environmental significance
- Consideration of the potential contribution of peatlands to an existing or proposed greenway/blueway/peatway network
- Consideration of the ecosystem services and tourism potential provided by peatlands
- Development of peatlands shall ensure that there are no negative impacts on water quality and hydrology
- Consideration of existing and future rehabilitation measures including enhanced rehabilitation measures(i.e. drain blocking and rewetting)
- Achievement of a carbon emissions balance”

These objectives are very important and clearly the construction of the proposed wind farm will negate many of these objectives.

There is also a section in the County Development Plan 2021-2027 in relation to Energy and Communications 13.9.13 DMS-109 Wind Farms and the following are listed as objectives;

- Impact on the visual amenities of the area
- Impact on the residential amenities of the area
- Impact on nature conservation, ecology, soil hydrology, groundwater, archaeology, built heritage and public rights of way
- Impact on ground conditions and geology
- Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines
- Impact of development of the road network in the area
- Impact on human health in relation to noise disturbance (including consistency with the World Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality.

The issues raised in these objectives are very relevant in relation to this proposed wind farm panning application.