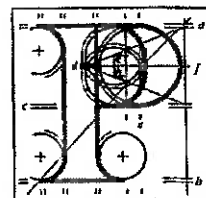


Our Case Number: ABP-309770-21



An
Bord
Pleanála

Aidan Walsh
Grove Cottage
Tromra
Castlepollard
Co. Westmeath
N91 H583

Date: 24 February 2023

Re: Proposed development of up to 15 wind turbines with a tip height of up to 175 metres and laying of approximately 26km of underground electricity cabling to facilitate the connection to the national grid, and all associated site development works
Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monktown, Mullagh, Newcastle and other townlands, Co. Westmeath

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.

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 Westmeath County Council 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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

PA04

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Niamh Thornton

From: SIDS
Sent: Thursday 23 February 2023 12:17
To: Niamh Thornton
Subject: FW: Case Number 309770-21
Attachments: Case 309770-21 Walsh response.pdf

From: Aidan Walsh [REDACTED]
Sent: Wednesday 22 February 2023 16:07
To: SIDS <sids@pleanala.ie>
Subject: Case Number 309770-21

Please see attached Observation on Further Information supplied by applicant.
Case number 309770-21
Please email acknowledgement of receipt of this email and attachment.

Aidan Walsh

**Aidan Walsh, Grove Cottage, Tromra, Castlepollard, County
Westmeath, N91 H583**

22 February 2023

An Bord Pleanála
64 Marlborough St
Dublin 1

Submitted via sids@pleanala.ie

Please can you send me a receipt as confirmation of receipt? aidanwalsh50@gmail.com

See below an Observation on Further Information about **Case Number 309770-21**
Coole Wind Farm SID. Townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura,
Doon, Monktown, Mullagh, Newcastle and other townlands, Co. Westmeath.

Thanks you for your letter of 22 December 2022 on this matter.
I submitted an observation previously under my name, Aidan Walsh. I understand there is
no fee to pay on this occasion.

Observation

I, Aidan Walsh of Grove Cottage, Tromra, Castlepollard, County Westmeath, N91 H583 wish
to make a written observation in relation to the Further Information from the applicant.

Expertise as archaeologists

I wish to comment on the 2022 report submitted by the archaeological consultancy, Tobar
which was engaged by Coole Wind Farm.

Tobar make much of their standing as qualified, professional archaeologists. In fact they
repeatedly quote this standing as underlying their opinion, where their views disagree with
those of others. See "Tobar Archaeological Services, Further Information and third party
responses raised concerning the proposed Coole WF, County Westmeath", dated
5/09/2022.

Tobar correctly state that "there is no legislative distance or industry standard approach for
the assessments of impacts on the setting of cultural setting assets." They conclude that
their assessment "is based on professional judgement and experience". On that basis and in

response to concerns raised by NWTAG and others in 2018, their assessment repeatedly finds no adverse impacts. I disagree.

Personal knowledge and expertise

- I am a professionally qualified archaeologist with a BA from University of Galway (formerly UCG).
- My professional experience in archaeology can be quickly summarised
 - Site Supervisor at central Dublin Viking sites on Winetavern Street
 - Field Archaeologist with An Foras Forbartha, Dublin
 - Studies for postgraduate degree in archaeology, UCG (now University of Galway)
 - Curator of the first County Museum in ROI with extensive archaeology collections
 - Director of an important a licensed archaeological excavation at the Black Pigs Dyke earthwork, County Monaghan. This led to-
 - Publication of preliminary reports on the dig at the Dyke, (Emania 1987 and Clogher Record 1991, respectively)
 - Recent full publication, jointly with a colleague, of the Dyke excavation in *"Materialising Power: The archaeology of the Black Pig's Dyke"* Published by Wordwell Books, 2022.

I contend that I have experience and judgement equal or greater to that of the Tobar archaeologists. This experience and judgement cannot be simply set aside by the regular statements from Tobar that their views are *"based on professional judgement and experience"*. I possess these qualities also and I disagree with Tobar's conclusions, on the basis *of my professional judgement and experience*. In the absence of the legislative distance or industry standard, cited by Tobar, professional opinion will be the deciding factors.

Tobar consultant's views on change to the wider setting of monuments-acknowledged by advisors to the Wind Farm

At 4.1.1 of the Tobar report, the consultants acknowledge "a change to the wider setting of national monuments" but "deemed to be Slight or Not Significant". I contend that this is a matter of opinion and that the wider effects on the landscape of the county cannot be negated by a technical assessment of individual monuments. Again at 4.1.1, Tobar states that "impacts to the wider setting on monuments is acknowledged but it is deemed to be Slight in the majority of cases". This is again, a matter of opinion.

In discussing the potential effect on the setting of **Mayne Bog Bronze Age** wooden road, near Coole, "a change in the wider setting of the monument was acknowledged" by Tobar, again deemed Slight. This amazing roadway with potential to be a significant visitor attraction and with bog-rewetting now a feature of public policy, is situated just over 3km from the nearest turbine. How can this visual impact be simply described by Tobar as "Slight". They take the same approach to the crannog cluster on nearby Lough Derravaragh with the well-researched and published **Coolure Crannog** as its centrepiece. Coolure

Crannog is the oldest crannog in Ireland, first occupied in 850BC and the subject of a publication by archaeologists at UCD in 2007.

Adverse effects on the settings of monuments

It is worth repeating here the details of the archaeological monuments that will be adversely affected by the proposed wind turbines. This information was previously submitted in 2018 to ABP and is the subject of the Tobar response under discussion here.

The applicant's EIS/EIAR frequently states that "there are no RMPs within the proposed development site". This is only so case because the "site" is tightly drawn and defined around the turbines and their access roads. A glance at the official records online shows that the many monuments in the immediate area are scheduled for addition to the RMP - (see National Monuments Service website <https://www.archaeology.ie/archaeological-survey-ireland>).

Within the following townlands, a range of monuments are waiting to be entered into the **Record of Protected Monuments**. The monuments are there, sitting in the landscape. They may not yet be on the official record but they are known to the State agencies. They are of sufficient importance to be scheduled for addition by the State agencies. Account needs to be taken of their existence.

The most significant monument is the **15th s century castle in Newcastle Td**. The NMS entry for this site is as follows

Class: Castle - tower house, 15th century

Townland: NEWCASTLE (Fore By.)

Scheduled for inclusion in the next revision of the RMP: Yes

Description: Situated on top of a low natural ridge running roughly E-W on the demesne lands of Newcastle House 130m to NNW. There is an old quarry depression just N of the tower house. Tower House type castle depicted standing on low hillock on the 1657 Down Survey map of Fore barony (NLI, MS 723-4). The written description of the Down Survey map of Lickbla parish lists Edward Nugent, described as owner of the lands and castle of Newcastle. A roughly square-shaped four-storey lobby-entrance tower house (ext. dims. 9.1m x 8.3m E-W; wall T 0.74m-1.8m; approx. H 10m) composed of limestone rubble, with pronounced base-batter (H 2.5m) and dressed quoins.

"The Castle of Leinster" by Mike Salter, (2004) adds "This tower may have been built under the terms of the 1429 act of Parliament allowing a £10 grant for the construction of such buildings". Erected by both Anglo-Irish and Gaelic families during the period from 1400 to 1650, tower houses came into existence by the early fifteenth century, when a 1429 statute allowed the counties of the Pale to grant £10 to landowners towards their construction. (from Anglo-Norman Ireland, Early Modern History (1500–1700), Features, Gaelic Ireland, Gaelic Revival, Issue 1 (Spring 1996), Medieval History (pre-1500), Volume 4)

Newcastle is less than 1 km of the proposed borrow pit and 844 metres from Turbine 13.

The planning application and appeal covers the townlands of Coole, Monktown, Camagh (Fore by), Doon, Carlanstown, Clonsura, Clonrobert, Mullagh, Boherquill and Joanstown.

Within these townlands, the following monuments are also awaiting entry in the State's RPM. Because they are not currently entered does not invalidate their importance to archaeology, to heritage or to tourism. They are as follows – (extracts from online NMS database)

WM002-003----Class: Castle – motte Townland: CAMAGH (Fore By.)
Scheduled for inclusion in the next revision of the RMP: Yes
This monument sits within 811 metres of Turbine 11

WM003-052----Class: Ringfort - rath Townland: COOLE
Scheduled for inclusion in the next revision of the RMP: Yes

WM001-028----Class: Crannog Townland: CLONSURA
Scheduled for inclusion in the next revision of the RMP: Yes

WM003-002----Class: Ringfort – rath Townland: NEWCASTLE (Fore By.)
Scheduled for inclusion in the next revision of the RMP: Yes

Carlanstown and Curry townlands will be visually impacted by a turbine development of this scale. This is also an area of natural beauty (and striking views mentioned previously including the prominent North Westmeath landmark and beauty spot of the Hill of Mael/Maol).

The following monuments in this adjacent area awaiting addition to the RMP, at present.

WM003-003----Class: Cairn – unclassified Townland: CURRY
Scheduled for inclusion in the next revision of the RMP: Yes

WM003-101----Class: Enclosure Townland: CURRY
Scheduled for inclusion in the next revision of the RMP: Yes

WM001-031---Class: Bawn Townland: CARLANSTOWN
Scheduled for inclusion in the next revision of the RMP: Yes

WM003-030----Class: Ringfort – rath Townland: BALLYNAMEAGH
Scheduled for inclusion in the next revision of the RMP: Yes

Running contrary to Westmeath County Council policy on heritage

Since I last commented on this wind turbine application in 2018, a new Westmeath County Development Plan has been published which offers strong policy support to my position, in my view. To permit the proposed Coole development of this scale and of such visual disruption will undoubtedly detract for the interpretation and the setting of the archaeology and architecture of the general area and in particular of the immediate area around the wind farm.

Westmeath County Council's 2021-2027 CDP recognises the importance of the landscape character of the County. It clearly states that "Lough Derravaragh provides one of the enduring images of County Westmeath." It further states that it has a policy objective to "Develop the cultural and recreational aspects of the Children of Lir Legend as a tourist attraction for the area."

The Council Plan covers **archaeological heritage** and contains very supportive statements to which the Wind Farm development will run counter. They state their Archaeology Policy Objectives to include-

"Seek to ensure the protection of archaeological sites and monuments and their settings and archaeological objects that are listed in the Record of Monuments and Places, in the ownership/guardianship of the State, or that are the subject of Preservation Orders or have been registered in the Register of Historic Monuments.

Seek to ensure the protection and preservation of archaeological sites, which have been identified subsequent to the publication of the Record of Monuments and Places. " (CPO 14.6)

I draw your attention in particular to the Council's stated intention above to protect monuments identified subsequent to the last published RMP and not yet forming part of current RMP.

The Council's CDP has a relevant **strategic aim** as follows

Westmeath County Council recognises the importance of identifying, valuing and safeguarding our archaeological, architectural and cultural heritage for future generations and aims to do so by means of proper management, sensitive enhancement and/or appropriate development of this resource.

The Council CDP2021-27 also states a **number of policies** in support of this aim which are relevant to this proposed development, as follows

"Seek to ensure the protection and sympathetic enhancement of archaeological Heritage" (CPO 14.5)

It also states a policy objective in regard to the wider effect of development, as follows

“Ensure that any development adjacent to an archaeological monument or site shall not be detrimental to the character of the archaeological site, or its setting and shall be sited in a manner which minimises the impact on the monument and its setting. Development which is likely to detract from the setting of such a monument or site will not be permitted.” (CPO 14.7)

Figure 12-7 of the applicant's EIS, shows 162 recorded monuments within 5km of a turbine. The development of this grossly oversized wind farm in such a low lying landscape will be deeply damaging to the historic and natural environment, on visual grounds but also as unnecessarily disrupting the ancient archaeological landscape. It will indeed run contrary to the Council's views as stated above.

World Heritage Site status, now on UN tentative list

In their assessment of impact on World Heritage Sites, National Monuments and Recorded Monuments, (Par 4.1.1) Tobar concluded that the Hill of Uisneach, 28km from the nearest turbine, would not be impacted. I disagree.

They also fail to mention that the Hill of Uisneach was placed by UNESCO on Ireland's 'Tentative List' for UNESCO World Heritage Status. This was announced in July 2022. The Tobar report is dated September 2022.

Uisneach is part of a “tentative” list which is composed of 5 major archaeological sites, as follows- Macha in Armagh; Dún Ailinne in The Curragh, Kildare; the Rock of Cashel in Tipperary; and the Hill of Tara in Meath. That's how important it is and its setting should not be jeopardised by the sight of industrial scale wind turbines, even on the horizon.

Contrary to tourism policy and strategy on heritage tourism- Hidden Heartlands

There is wider context to the proposed wind farm in this area and it is the national and local tourism policy on heritage tourism.

To grant permission for this development would run contrary to government policy and strategy in regard to heritage tourism. Fáilte Ireland is the National Tourism Development Authority and has developed an umbrella destination for the Midlands called Ireland's Hidden Heartlands.

Fáilte Ireland's description of this branding is as follow

Ireland's Hidden Heartlands offers unparalleled opportunities to get 'active in nature' and to get 'off the beaten track' with a latticework of vibrant waterways and myriad walking trails. It is a region full of intriguing hidden gems – places, people and experiences – to be uncovered at your own pace, in your own time, exploring the communities, tastes and textures as you go. Self-styled as Ireland's best kept secret, the Hidden Heartland's provides

visitors with a unique, authentic, local and immersive visitor journey for those keen to get away from it all.

Will an array of huge wind turbines across North Westmeath, latticed by concrete access roads and giant concrete hardstands, fit with the tourist expectation of a pastoral idyll as described by Fáilte Ireland? I think not.

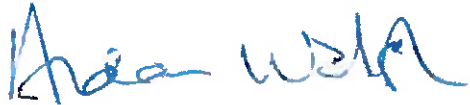
Industrial scale wind turbines will produce a negative emotional effect and will deter visitors. The wind turbines will deflect tourism from North Westmeath and disincentivise tourism in this area.

Conclusion

With community heritage and heritage tourism to the forefront of my mind, I believe that the proposed turbine farm will degrade the beauty and integrity of an unspoiled largely pastoral landscape of North Westmeath and destroy its potential for community pride and heritage tourism use.

Taken together with Westmeath County Councils new CDP, it is evident that public policy on both heritage and heritage tourism would not be implemented in North Westmeath if this wind turbine development goes ahead.

I urge ABP to dismiss this planning application.



Aidan Walsh

22 February 2023