

Further Information and third party responses to concerns raised regarding the Proposed Coole WF, County Westmeath

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1 INTRODUCTION

Tobar Archaeological Services Ltd prepared the archaeology and cultural heritage chapter of the EIAR which accompanied the planning application for the proposed Coole Wind Farm, County Westmeath. This document consists of a response to a request for Further Information (ABP Ref 309770-21 issued by An Bord Pleanála as well as addressing third party concerns.

Miriam Carroll and Annette Quinn are directors of Tobar Archaeological Services Ltd. Miriam and Annette both graduated from University College Cork in 1998 with a Masters degree in Methods and Techniques in Irish Archaeology. Both are licensed by the Department of Housing, Local Government and Heritage to carry out excavations and are members of the Institute of Archaeologists of Ireland. Annette Quinn and Miriam Carroll have been working in the field of archaeology since 1994 and have undertaken numerous projects for both the private and public sectors including excavations, site assessments (EIAR) and surveys. Miriam Carroll and Annette Quinn are directors of Tobar Archaeological Services which has been in operation for 19 years.

2 AN BORD PLEANÁLA REQUEST FOR FURTHER INFORMATION

The request for further information issued by An Bord Pleanála details the following:

'6.1 Please provide a comprehensive response to the matters raised in the submissions and observations received by the Board from members of the public and prescribed bodies and to the matters raised in the report received from Westmeath County Council including the recommended planning conditions.

6.2 In responding to submissions and observations you are requested to supplement your response with additional photomontage or drawings are required. This may include further details with respect to proposals for cultural heritage mitigation.'

3 LOCAL AUTHORITY SUBMISSIONS

3.1 Westmeath County Council

The submission by Westmeath County Council referred to Chapter 13 Archaeology and Cultural Heritage, summarised the findings of same and the recommended mitigation measures therein. WCC concluded that while the proposal would *'alter the setting and character of the area, it is not considered that this alteration to represent an inappropriate change in the context of features of archaeological and cultural interest.'* In its recommendation for conditions it cites *'Archaeological recording, reporting and any further mitigation arising from same'*. It does not request any additional information regarding archaeology or cultural heritage.

4 RESPONSES TO THIRD PARTY SUBMISSIONS

4.1 Concerns regarding effect on setting of archaeological monuments

A number of submissions raised concerns regarding the effect of the proposed wind farm development on the setting of archaeological monuments within the surrounding landscape. It is asserted in the submissions that the proposed turbines will *'damage the context, detract from the interpretation and destroy the character of the archaeological and historical sites of the area'*. Chapter 13 of the EIAR included a comprehensive assessment of the potential visual effects of the proposed wind farm development on the archaeological and cultural heritage resource. The assessment of potential impacts on setting of recorded monuments was aided by ZTV, photomontage, desk-based assessment and site inspection where appropriate. The methodology utilised in the assessment is presented in Chapter 13 section 13.2.4. There is no legislative distance or industry standard approach for the assessment of impacts on the setting of cultural heritage assets. A standardised approach was utilised for the assessment of impacts of visual setting (indirect effects) according to types of monuments and cultural heritage assets which may have varying degrees of sensitivity. The assessment of impacts on visual setting was undertaken using both the Zone of Theoretical Visibility (ZTV) map in the Landscape and Visual Impact Assessment (LVIA), as presented in Chapter 12 of the EIAR, and also viewshed analysis from specific cultural heritage assets. All SMRs, RMPs, RPS, and NIAH structures within 5km of each turbine were included in the EIAR in order to assess potential effects on setting. This is based on professional judgement and experience.

A number of submissions also refer to the photomontages taken from some National Monuments and other locations. These submissions are dealt with in the Landscape and Visual response (Appendix 6, Section 3.1). It should also be noted that the photomontages taken from the various National Monuments, including Fore Abbey, are considered to be sufficient for assisting in assessing potential visual effects on such monuments from an archaeology and cultural heritage perspective.

4.1.1 UNESCO World Heritage Sites, National Monuments and Recorded Monuments

The assessment included potential impacts to the setting of UNESCO World Heritage Sites, National Monuments (Granard Motte, Loughcrew, Fore Abbey, Fore Town Gates, Mortimer's Castle and Wattstown/Frewin Hill), recorded monuments within 5km of the nearest turbine, Protected Structures and NIAH structures.

The Hill of Uisneach (UNESCO WHS Tentative List) is situated c. 28km from the nearest proposed turbine. It was concluded that given this distance the immediate setting of the monument would not be impacted and that the potential effect to its wider setting would be Imperceptible. No change to the immediate setting of any National Monuments as a result of the proposed turbines was identified. The National Monuments in question are located at distances of between c. 8km and 16km to the nearest proposed turbine. While a change to the wider setting of the National Monuments was identified it was deemed to be Slight or Not Significant, particularly given the intervening distance of the proposed turbines from the monuments (see Chapter 13, Table 13-9). Also, it was noted that where such monuments are publicly accessible there will be a continued ability of the visitor to appreciate the monument despite the introduction of the proposed development to the wider landscape. The assessment of potential impacts on setting was aided by viewshed analysis, ZTV, photomontage, desk-based assessment and site inspection where appropriate.

A comprehensive assessment of potential effects to the setting of recorded monuments within 5km of the nearest proposed turbine was also carried out and is detailed in Chapter 13 of the EIAR. Table 13-

10 lists all recorded monuments within 5km of the proposed turbines, their sensitivity (visual dominance, above ground trace, uniqueness, proximity to site, etc.) significance of impact, and distance to the nearest turbine. Impacts to the immediate setting of any recorded monuments as a result of the proposed development was not identified. Impacts to the wider setting of such monuments is acknowledged but is deemed to be Slight in the majority of cases, with some slight-moderate and others imperceptible.

One such monument within 5km of the nearest proposed turbine is the crannog WM001-028--- at Clonsura townland. The monument is located just over 300m from the nearest proposed turbine, T2. This crannog is referred to in several submissions, with concerns regarding its proximity to Turbine 2. The assessment of potential impacts to the setting of recorded monuments included the crannóg and Chapter 13 (Section 13.4.4.1.3) noted the following regarding that monument: *'For example, the nearest monument, WM001-028, comprises a crannóg which is not readily visible in the landscape given its low-lying position and form. In addition, it is inaccessible to the public and is not apparent from the nearest public road. Despite its proximity to the nearest turbine, therefore, the potential impact to same is still regarded as slight.'*

Concerns regarding potential impacts to the setting of Mayne Bog trackway and damage to the potential for associated heritage tourism as a result of the proposed development were also raised in a number of submissions. See also the Landscape and Visual response (Appendix 6, Section 3.2). The recorded monuments comprising the togher at Mayne Bog (WM002-038---- and 039----) were included in Chapter 13 of the EIAR and are located just over 3km to the nearest proposed turbine, T14. Given the distance of the trackway from the nearest proposed turbine, no impacts to its immediate setting were identified. A change to the wider setting of the monument was acknowledged, however, and as per many of the other recorded monuments within 5km of the proposed turbines, is regarded as Slight. At the time of the assessment the trackway comprised a monument with some very fragmented surface expression (see section 13.3.1.1.6, Plates 13-6-13-11) , and the potential for some surviving sub-surface remains. Also at the time of assessment it did not comprise a publicly accessible monument with formal public access. Should the preservation of a portion of the trackway proceed, as referred to in the submissions, its appreciation and interpretation will be possible regardless of the presence of turbines at a distance of c. 3km.

Reference is also made in a submission to recorded monuments (WM007-003---- Ringfort and WM007-004---- Crannóg) on the shore of Lough Derravaragh and the effect the proposed turbines will have on the setting of such monuments. It is noted in the submission that the monuments in question are located in excess of 5km from the nearest turbine and are therefore outside the 5km study area for recorded monuments. As outlined above, the methodology utilised in the assessment is presented in Chapter 13 section 13.2.4. There is no legislative distance or industry standard approach for the assessment of impacts on the setting of cultural heritage assets. A standardised approach was utilised for the assessment of impacts of visual setting (indirect effects) according to types of monuments and cultural heritage assets which may have varying degrees of sensitivity. The assessment of impacts on visual setting was undertaken using both the Zone of Theoretical Visibility (ZTV) map in the Landscape and Visual Impact Assessment (LVIA), as presented in Chapter 12 of the EIAR. All SMRs, RMPs, RPS, and NIAH structures within 5km of each turbine were included in the EIAR in order to assess potential effects on setting. This is based on professional judgement and experience. The ringfort WM007-003- is situated c. 5.3km to the south of the nearest proposed turbine, T14, while the crannóg WM007-004- is located c. 5.5km south of the nearest proposed turbine T14. The ZTV demonstrates that 1-3 turbines would theoretically be visible from the ringfort, while 12-15 turbines would theoretically be visible from the crannóg. As per the other recorded monuments which occur within 5km of the nearest proposed turbine, the immediate setting of these monuments will not be impacted by the proposed development. A change to their wider setting is acknowledged but is regarded as Slight given the distance of the monuments to the nearest proposed turbine and their low visibility in the landscape. There is also no formal public access to these monuments.

4.2 Concern regarding Mitigation Measures

Several submissions refer to the lack of mitigation measures regarding archaeological heritage in Chapter 3 of the EIAR. Chapter 13 of the EIAR provides a comprehensive assessment of potential impacts on archaeology and cultural heritage as a result of the proposed development. It also outlines appropriate mitigation measures in relation to the recorded and unrecorded archaeological, architectural and cultural heritage resource (see section 13.4.3 for mitigation measures regarding construction phase potential (direct) impacts). In summary the mitigation proposed in Chapter 13 include the following:

- Pre-construction walkover survey / inspection of areas proposed for excavation will be undertaken to re-assess the bog for new sites
- Pre-development (pre-construction) archaeological testing of turbine bases, hardstand and access roads proposed for excavation, borrow pit, substation and compound. A report setting out the findings will be submitted to the relevant authorities.
- Archaeological monitoring (during construction) of all ground works and metal detection of spoil.
- A report on the results of the monitoring shall be compiled and submitted to the relevant authorities on completion of the project.
- Further mitigation such as excavation (resolution) of any newly discovered archaeological sites may be required if discovered during pre-construction archaeological testing and/or construction stage archaeological monitoring. Consultation with the National Monuments Service of the DHLGH will be required should such sites be uncovered.
- Buffer zone of 20m around the unnamed bridge on the River Glore.
- Pre-construction building survey of the stone structure adjacent to the proposed link road and monitoring of ground works during the construction phase of the project
- Archaeological monitoring of ground works for proposed junction accommodation works. A report on the monitoring should be compiled and the results submitted to the relevant authorities.

The mitigation measures detailed in Chapter 13 of the EIAR are cognisant of the potential for the discovery of unknown, sub-surface archaeological finds, sites or deposits within the proposed development site. The implementation of the mitigation measures as outlined (in particular pre-construction archaeological testing) will increase the likelihood of detecting any such sites, if present, prior to the commencement of ground works associated with the construction phase of the project. Archaeological monitoring of all ground works during the construction phase of the project will also serve to detect any previously undiscovered artefacts, features or deposits. Any archaeological testing or monitoring will be carried out under licence from the National Monuments Service (NMS) of the DHLGH and consultation with the NMS will be required should archaeological sites be uncovered during the works.

4.3 Grid Connection Route

4.3.1 Concern regarding Protected Structures

Concerns regarding the proximity of some Protected Structures to the proposed grid connection route are raised in a number of submissions. As outlined in Chapter 13, Section 13.3.2.2.1 (Table 13-7) twenty structures listed in the RPS for County Westmeath are located within 100m of the proposed grid connection route. The closest protected structure to the Grid Connection Route comprises Levington railway crossing gates which are located on the public road along which the proposed Grid Connection Route extends. The level crossing gates are 19th century in date being part of the Dublin-Sligo railway line and are still in active use. In Coole, Simonstown House (Ref. 003-042) is situated off-road in private property and will not be directly impacted by the works associated with the Grid

Connection Route which will be placed within the public road c. 38m to the north-west. Other protected structures in close proximity to the proposed Grid Connection Route comprise the gate lodge (Ref. 019-237) and gateway (019-236) to Levington Park house which is also included in the Record of Protected Structures (Ref. 019-234). The house is situated c. 130m to the north-west of the proposed underground Grid Connection Route in private property and will not be impacted by works associated with the underground cable. The roadside features associated with the house as mentioned above are situated within 2-4m of the proposed Grid Connection Route which will extend along the adjacent public road. While it is unlikely that any direct impacts to these structures will occur as a result of the proposed Grid Connection Route some mitigation at the construction stage of the Proposed Development is recommended for this area as follows (see Chapter 13 Section 13.4.3.6.3):

- Archaeological monitoring of ground works during construction where they extend past the NIAH/Protected Structures at Farranistick. A report on the results of the monitoring shall be compiled and submitted to the relevant authorities on completion of the project.

4.3.2 Concern regarding Mitigation Measures

A concern was raised in one submission regarding the adequacy of the proposed mitigation measures relating to archaeology along the proposed grid connection route. Archaeological monitoring of ground works associated with the grid connection route where it extends past a number of recorded monuments has been recommended (See Chapter 13 Section 13.4.3.6.2). It is suggested in the submission that should archaeological remains be found during the course of the monitoring that the authorities will only be informed when the report on the completed work is submitted. As is best practice with all large-scale developments, archaeological monitoring of the works along the proposed grid connection route will be carried out under licence from the National Monuments Service (NMS) of the DHLGH. A methodology pertaining to the archaeological monitoring will be subject to the approval of the NMS and any remains uncovered during the course of the works will be reported to the NMS as per the agreed methodology in order to agree the best course of action and any further mitigation (such as excavation) required in this regard.

It is also suggested in a submission that archaeological monitoring is inadequate mitigation where the grid connection extends past Mayne church, font, graveyard and ecclesiastical enclosure (WM003-083---, WM003-083001-, 002- and 003-) and that the presence of a possible ecclesiastical enclosure around the church may suggest that a further outer enclosure is located under the public road along which the grid connection will extend. It is noted in the monument description (WM003-083003-) that 'the semi-curving form of the graveyard boundary wall possibly indicates the presence of an Early Christian ecclesiastical enclosure'. The graveyard boundary wall is situated c. 21.5m to the west of the proposed grid connection route. A review of the available cartographic and orthophotography sources does not provide any evidence for a further outer enclosure. It is considered, therefore that archaeological monitoring of ground works along the grid connection route where it extends past the church, graveyard and possible ecclesiastical enclosure is adequate mitigation. As outlined above, monitoring of the works associated with the grid connection route will be carried out under licence from the National Monuments Service (NMS) of the DHLGH. A methodology pertaining to the archaeological monitoring will be subject to the approval of the NMS and any remains uncovered during the course of the works (if present) will be reported to the NMS as per the agreed methodology in order to agree the best course of action and any further mitigation (such as excavation) required in this regard. A report detailing the results of the monitoring and any findings will be compiled on completion of the works and submitted to the relevant authorities.

5 CONCLUSION

This document comprises a response to a Request for Further Information issued by An Bord Pleanála (Ref. 309770-21) regarding the proposed Coole Wind Farm, Co. Westmeath. It also addresses a number of third party submissions, many of which raised concerns regarding the potential effects on the setting of archaeological heritage in the surrounding landscape. Concerns were also raised regarding mitigation measures relating to archaeology and protected structures, primarily along the proposed grid connection route. Concerns raised regarding photomontages are dealt with in the Landscape and Visual response and should be read in conjunction with this document. It is considered that all concerns regarding the assessment process and the results of same as reached in Chapter 13 of the EIA are addressed here and that the mitigation measures outlined in the Chapter are appropriate for the amelioration of any potential impacts identified.