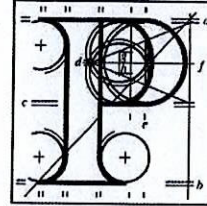


Our Case Number: ABP-309770-21

Planning Authority Reference Number:



**An
Bord
Pleanála**

Aidan Walsh
Grove Cottage
Tromra
Castlepollard
Co. Westmeath
N91 H583

Date: 19 May 2021

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 observation or submission in relation to the case mentioned above 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.

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.

For further information on this case please access our website at www.pleanala.ie and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Eimear Reilly
Administrative Assistant
Direct Line: 01-8737184

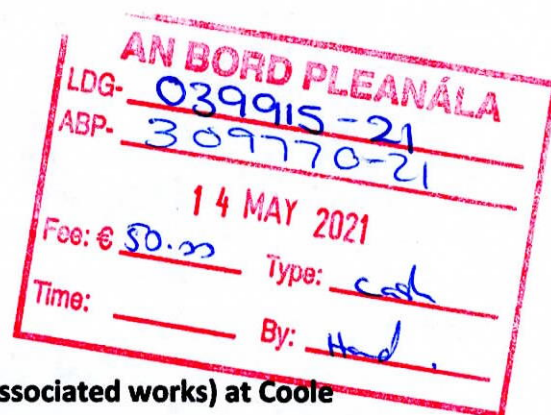
BL50A

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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

May 12, 2021



**Planning Application for a Wind Farm Development (and all associated works) at Coole and other townlands) County Westmeath
PA25M.309770**

I write to comment on the SID application for the proposed construction of a wind energy development (and all associated infrastructure) in the townlands of Camagh, Carlanstown, Coole, Clonrobert, Clonsura, Doon, Monktown, Mullagh, Newcastle, Boherquill, Corralanna, Culvin, Joanstown, Mayne, Fearmore (Fore by), Newtown (Fore by), Simonstown (fore by), Ballinealoe, Shrubbywood, Clonava, Lackan (Corkaree by), Soho, Ballynaclonagh, Abbeyland, Rathganny, Ballindurrow, Cullendarragh, Culleenabohoge, Ballynafid, Knightswood, Portnashangan, Culleen More, Farranistick, and Irishtown (Moyashel by), Co. Westmeath.

This application is being made directly to An Bord Pleanála as 'Strategic Infrastructure Development' (SID) under the provisions of Section 37E of the Planning and Development Act 2000 as amended.

In addition to being a resident of North Westmeath, I am retired archaeologist and curator. I am still active in archaeology and later this year will be co-authoring a monograph about an archaeological excavation which I directed at the Black Pig's Dyke¹.

My opinion as a resident and archaeologist

Having carefully examined the application and in particular Chapter 13, Archaeology and Heritage of the EIAR, it is my view that the development will despoil an area of significant historical and archaeological interest and its associated tourism potential.

The insertion of 15 turbines into out-of-the-way bogs is only part of its impact. Much of the pastoral landscape of north Westmeath will be significantly blighted by these oversized turbines which, because of their scale, will loom over large areas.

I urge that this Strategic Infrastructure Development Application be refused for the reasons presented below.

¹I have held several cultural posts, firstly as Curator of Monaghan County Museum, established and funded since 1974 by Monaghan County Council. While in that post, I directed and wrote a preliminary account of a licensed archaeological excavation on the celebrated earthwork, the Black Pigs Dyke.

I next worked as Director of the Northern Ireland Museums Council and after an 11 year period in Belfast, I returned south to become a private consultant, working from my home in Westmeath for clients in Ireland and the UK.

General – solar and offshore better

This application is of the wrong scale, in the wrong place and uses the wrong energy source. Offshore Wind is becoming more cost effective and acceptable with less of an environmental impact. There is ample press and media coverage on the highly beneficial effects of re-wetting and regenerating bogs worldwide in the quest to capture carbon.

In north Westmeath, the area most affected by this application, we are strongly in favour of micro sources of renewable energy that are being planned for the area. For example the solar wind farm at Tullynally Estate that will provide energy for at least half of Castlepollard. This solar farm will be installed and run by the Elgin Energy Scheme who is leasing the land from Tullynally. Planning permission has been granted and the solar farm will be up and running in 2024. This is the way forward in a low-lying, inhabited and largely pastoral landscape.

Contrary to national and local tourism policy and strategy on heritage tourism

To grant permission for the proposed Coole Wind Farm would run contrary to government policy and strategy on heritage tourism.

Fáilte Ireland, the National Tourism Development Authority has have developed an umbrella destination called Ireland's Ancient East, to create an "emotional pull and inspire visitors to travel to this part of the country". 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.

The Department for Transport, Tourism and Sport published its strategy in 2015, entitled "People, place and policy - growing tourism to 2025". It envisages a central role in tourism for local authorities. It writes about "protecting key tourism assets" and the "importance of heritage and environment" to tourism and the "protection and promotion" of cultural heritage. It proposes "a major programme of investment of looped walks". Westmeath County Council has already successfully implemented this strategy at Fore.

The strategy further proposes "improvements to the quality of interpretation at a large number of existing visitor attractions". This is already proposed for Mayne Bog near Coole where Ireland's oldest 3000 year-old Bronze Age has been discovered and is being considered for preservation and interpretation by both Westmeath County Council and the state's National Monuments Service.

Putting a wind farm in north Westmeath and especially one of such scale will damage the tourism and recreational potential of North Westmeath's heritage, including the Bronze Age roadway.

Contrary to goals for tourism and heritage, Westmeath

Castlepollard has recently been awarded almost €500,000 for regeneration and restoration with tourism very much in mind. The town is less than 7km from the proposed windfarm .

Westmeath County Council comments as follows on this funding, emphasising the exploration of the area around the town².

"To regenerate Castlepollard, building on the unique architectural heritage of the Town Square and Green, creating space for the community and visitors alike, restoring the Market House and delivering a Town Park, establishing Castlepollard as base, from where, *visitors will explore the many sights of North Westmeath*, enhancing the towns critical role as an economic driver for the region".

It is also the objective of Westmeath Development Plan "to protect the context of its rich cultural heritage". Furthermore, the CDP commits to generally preserve in situ all archaeological remains and sites of importance...***their setting and context and zones of archaeological potential*** (P-AH1).

At O-AH1, WCC commits to control development that may be detrimental to any feature or site of archaeological significance or that may seriously detract from the ***interpretation and setting of these sites***.

Furthermore, at O-AH8, the Council requires developments above or below ground, to respect the character of archaeological sites and their settings. The reference to protecting ***"settings"*** is repeated at CPO 14.6 and CPO 14.7.

At P-AH5 of its CDP, Westmeath County Council commits to designate walking routes to important archaeological sites".

Visual impact- Effect on attractiveness of the landscape and archaeology

This application for the installation of giant industrial scale wind-turbines into the landscape of north Westmeath will damage the context, detract from the interpretation and destroy the character of the archaeological and historic sites of the area.

The first photomontage in the EIAR shows photoshopped images, wireframe images and a map of the location of the protected view from Coole, taken from Burkes bar, Coole. Coole is the village most adversely affected by this proposed Windfarm. The image should show the protected view **from** this site but it looks north, away from the view. The real visual impact on the landscape in this part of Coole should show the view from Mayne Bog towards the turbines. The montage is misleading. As discussed below, Mayne Bog and the Bronze Age wooden road in Mayne Bog, with much potential for tourism and heritage, will be adversely impacted.

Photomontage no 14 is from Frewin Hill, a national monument which is located near Lough Owel some 16.3Km from the nearest turbine. Despite this distance the turbines can be seen standing vividly above the landscape and breaking the beautiful skyline. This demonstrates the impact these industrial turbines will have on the landscape as far away as Mullingar if erected.

² <http://www.westmeathcoco.ie/en/ourservices/regeneration/castlepollardregeneration/>

Photomontage no 18 is from Granard Motte, a National Monument. The turbines stand clear and clean against the surrounding landscape and higher than the hills in the background. They have also been rendered in mid-dark grey to blend in with the clouds in the sky; a cynical attempt to *reduce their visual impact on the landscape* in this photomontage.

In Photomontage no 21 which is taken from the Cairn at Mullaghmeen 5.3km away the turbines are all clearly visible against the landscape and the skyline. They are completely out of place and change the landscape from rural to industrial.

Photomontage no 22 is taken from Fore. Looking at the images provided by the applicant, one can hardly see the turbines at all. However, the photo was taken from low pathway into the Benedictine abbey monument.

The 10th century pre-Norman Early Christian oratory is arguably more important than the Abbey. It is a **National Monument** and it is situated on much higher ground than the photo viewpoint. In fact, the elevated position of the oratory will provide a much more extensive view of the turbines, than from the low pathway.



View of Tullyally Castle, Castlepollard with the Hill of Mael / Maol in the background. Turbines will impinge on this view. Mael is further discussed below.

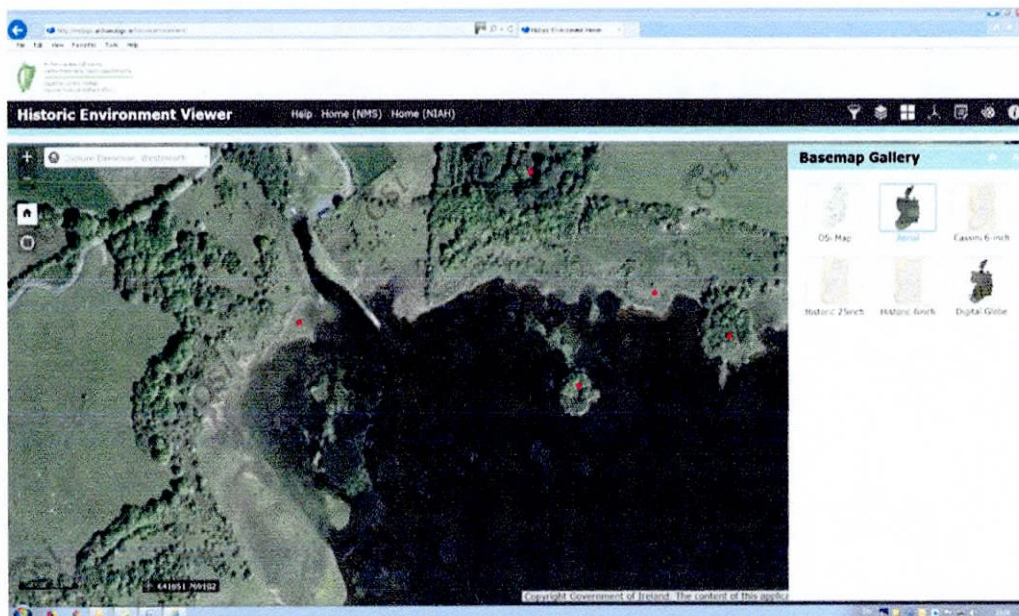
Damaging the potential for heritage tourism

The archaeological heritage in North Westmeath has significant tourism and community potential. In this beautiful, unspoiled, rural landscape, research tells us-

Work by UCD and the National Museum of Ireland has demonstrated that "Lough Derravaragh, 5km from the nearest turbine has a rich archaeological landscape, with evidence for lakeshore activities in the Late Mesolithic, the Late Bronze/Iron Age and the early medieval period in particular. There are at least 22 crannogs around the lake, many of which show evidence for activity between the seventh and the eleventh century AD." ³

Research **at Coolure Demesne Crannog** at the north end of Derravaragh, the area closest to the proposed wind farm, **has yielded results of national significance** showing that this royal crannog was first occupied about 850 BC, making it the earliest Irish crannog by two hundred years!

³ Coolure Demesne Crannog, Lough Derravaragh : An Introduction to Its Archaeology and Landscapes. Aidan O'Sullivan, Rob Sands Eamon Kelly, 2007.



Coolure island crannog, Lough Derravaragh (source archaeology.ie)

Since the Coolure Crannog sits just outside the 5km radius discussed by the EIAR, it has not been discussed or considered by the applicant.

Furthermore, a major royal earthwork sits on the shore of Lough Derravaragh, opposite the crannog.

The National Monuments Service describes it as follows

WM007-003---- Ringfort – rath. Townland: COOLURE DEMESNE

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

This impressive ringfort at Coolure Demesne was possibly a royal site belonging to the Uí Fiachrach Cúile Fobhair (O'Sullivan et. al. 2007, 36)

Undoubtedly, the presence of these huge turbines will detract from the setting and context of these significant monuments. The same applies to Mayne.

Mayne Bog Bronze Roadway, Coole; Westmeath Heritage Plan

The National Monuments Service has scheduled the Mayne Bog Bronze Age roadway for inclusion in the next revision of its formal Record of Monuments and Places.

The County **Westmeath Heritage Plan 2018-2023** has adopted an objective, 3.11, as follows
*Work with all relevant stakeholders to explore and support the most appropriate means and measures for the protection, promotion and interpretation of the **Bronze Age wooden road and roadway at Mayne Bog.***

At present, funding is being sought for interpretation and publicising of this truly ancient pre-historic structure. Arrangements by the State, supported by Westmeath County Council,

are under consideration to preserve a section of this amazing 4-6 metre wide wooden roadway that is 3000 years old and one of the best in Europe⁴.

This proposal fits very well into a number of current local strategic actions and supports, including Fáilte Ireland's Ancient East strategy and branding. It also supports the development of a cluster of heritage products in North Westmeath, such as Fore, Tullynally and the mythology of this area.

In September 2006 a small-scale investigatory excavation was undertaken at Mayne Bog on behalf of the State. A carbon 14 date of 1200–820 BC was obtained from the superstructure, making it a remarkable structure of Bronze Age date, earlier than the celebrated Corlea Bog trackway in neighbouring County Longford by 1000 years.

200 metres of the Mayne Bronze Age roadway remain untouched in place beneath the bog. The road is 3km from the nearest turbine but the Windfarm will be clearly visible from it.



Mayne Bog Bronze Age road © Irish Archaeological Consultancy

As the applicant's EIA states "Further archaeological and environmental investigations of the plank road way have been recommended"⁵. This site has significant potential and more work will yield more information.

But who will want to visit a site within sight and sound of an enormous over-scaled wind turbine farm? Tourists will take their business elsewhere.

Destroying an historic landscape and its tourism potential

The applicant's EIA tells⁶ us that a total of **212 recorded monuments** are recorded within 5km of the nearest turbine. This further demonstrates the importance of the archaeological landscape that has been unveiled in north Westmeath in recent years.

⁴ Public statement by renowned Bronze Age expert, Emeritus Professor of Archaeology, NUIG, Dr. John Waddell.

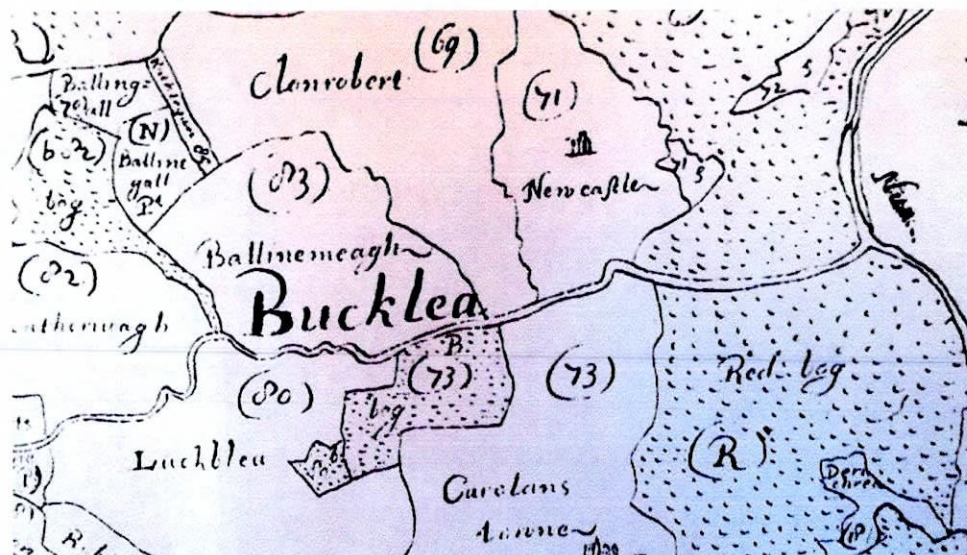
⁵ EIA Chap 13, page 32 forward

⁶ EIA Chap 13, page 145

This wider impact applies across the area, arising from the scale and industrial nature of the giant turbines.

The applicant's EIAR states that "No built heritage structures which are subject to legal protection are located within the Wind Farm Site boundary". Since this is tightly drawn around the hardstand and access, this is unsurprising. It continues ***"Fifty-three protected structures are located within 5km of the nearest proposed turbine"***⁸.

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.



Aidan Walsh May 2021

"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 construction⁹.

Gaelic resurgence (1350–1500)

The medieval English presence in Ireland was badly weakened by the Black Death, which arrived in Ireland in 1348. Because most of the English and Norman inhabitants of Ireland lived in towns and villages, the plague hit them far harder than it did the native Irish, who lived in more dispersed rural settlements. The plague was a catastrophe for the English habitations around the country and, after it had passed, Gaelic language and customs came to dominate the country again. The English-controlled area shrank back to the Pale, a fortified area around Dublin. It was at this time that Newcastle castle and similar £10 castles were built. *Its significance is greater than its modest physical remains.*



Turbine no 13 will sit 848 metres from this 15th century tower house and c. 600m from the proposed borrow pit. (photo: A. Walsh)

In addition to the castle, Newcastle House in Newcastle Td is a detached three-bay single-storey house over a raised basement house, built c.1830. NIAH registration number, 15400301. Rated regional importance.

⁹ (from Anglo-Norman Ireland, Early Modern History (1500–1700), Features, Gaelic Ireland, Gaelic Revival, Issue 1 (Spring 1996), Medieval History (pre-1500), Volume 4)



Turbine no 5 will sit 822 metres from Newcastle House.

Adverse effect on archaeology and landscape across a wide area

The townlands of Bigwood and Carlanstown are within 2km or less from the nearest turbine and will be visually impacted by a turbine development of this scale. This is also an area of natural beauty and striking views including the prominent North Westmeath landmark and beauty spot of the **Hill of Mael/Maol** with its remarkable limestone escarpment.

There is no photomontage showing the view from the Hill of Mael / Maol even though the hill also holds three archaeological sites, listed for inclusion in the revision of the RMP.

The three sites in Bigwood Td. are as follows

Hillfort, WM003-008001, Bigwood Td.

Cashel (stone fort), WM003-008. Bigwood Td.

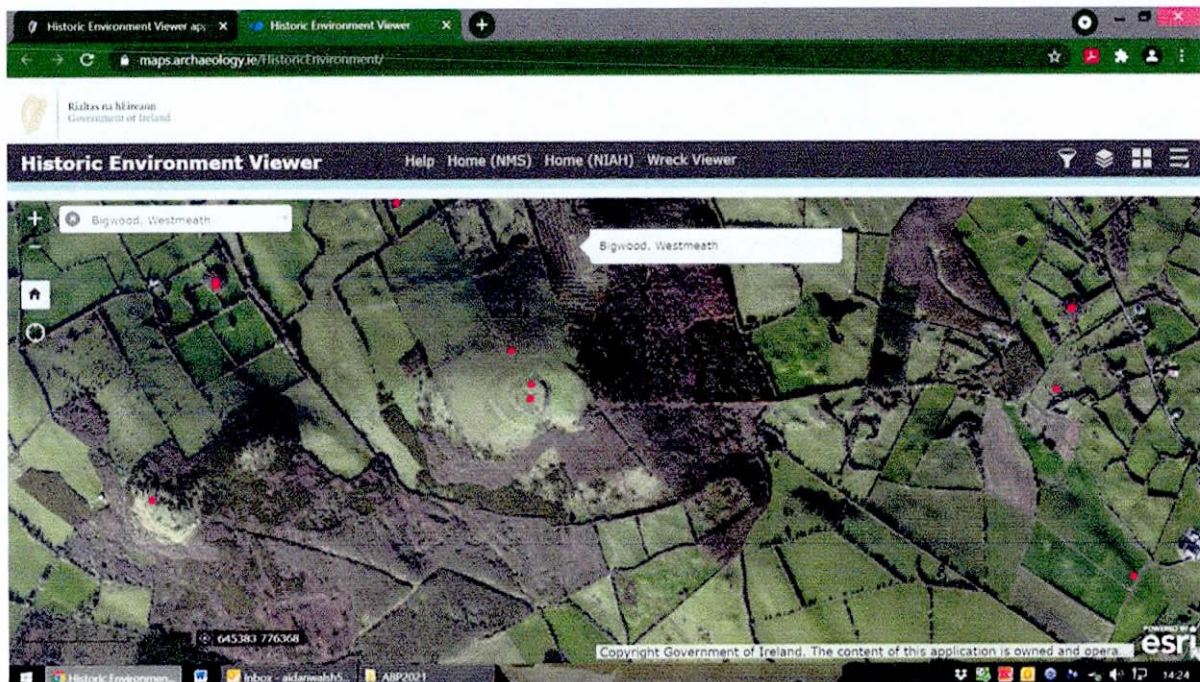
Field system, WM003-008002. Bigwood Td.

These sites in Bigwood Td. are less than 3km from the nearest turbine (no.15) but it's their setting which will be adversely affected.

The Hill of Mael is 241 metres height above sea level. The turbine is 175m high and sits on land that is 75m above sea level¹⁰. Taken together, the 75m and 175m totals 250m, higher even than the hills.

The proposed wind turbine development will significantly dominate the landscape and detract from it visually.

¹⁰ EIAR Chap 12.32



Screen grab of Hill of Mael / Bigwood with archaeology sites in red. Taken from [archaeology.ie](https://maps.archaeology.ie/HistoricEnvironment/)

The Bigwood sites and the following neighbouring sites are all scheduled for inclusion in the next revision of the RMP.

WM003-003----Class: Cairn – unclassified Townland: CURRY

WM003-101----Class: Enclosure Townland: CURRY

WM001-031---Class: Bawn Townland: CARLANSTOWN

WM003-030----Class: Ringfort – rath Townland: BALLYNAMEAGH

Atop the Hill of Mullaghmeen sits a prehistoric cairn. The National Monuments Service describes it as follows

WM001-060----

Class: Cairn - unclassified

Townland: MULLAGHMEEN

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

Description: Situated on top of Mullagh Hill with *panoramic views in all directions*. Good view of Lough Sheelin 3.8km to N. Small irregular shaped cairn (Diam. 7m; H 0.4m).

As NMS continues to recount, this cairn has other more recent heritage value since it was used as a penitential cairn / mass site in the 17th/18th century.

Less than 1 km to the south, on another hilltop in the appropriately named townland of Carn, another cairn and fort can be found which the NMS describes as follows -

WM001-027----

Class: Cairn - unclassified

Townland: CARN

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

Description: Situated on the summit of a hill, just above the 800 foot contour with **panoramic views in all directions**. Summit of Mullaghmeen Hill and Lough Sheelin visible 820m and 4.3km to the N respectively, Hill of Mael with hilltop enclosure and possible hillfort (WM003-008----/008001-) visible 2.6km to the SW. The cairn appears to be standing inside a larger multivallate hillfort/hilltop enclosure (WM001-027001-).

The Carlanstown Bawn is less than 1km from the nearest turbine¹¹. This is a rare survival of a 17th century structure in the midlands. The NMS database describes it as follows.

Class: House - fortified house. Scheduled for inclusion in the next revision of the RMP: Yes

Description: Carlanstown House and its adjoining farmyard are enclosed by the bawn wall of Carlanstown Castle. In 1641 'Carolanstowne' Castle was the property of Robert Nugent who was listed as an 'Irish Papist' in the 1657 Down Survey map of Lickbla parish (NLI, MS, 723-4). The castle is depicted as a large castellated structure on the 1657 Down Survey map of Fore Barony (ibid.).

The setting and context of this remarkable site will undoubtedly be compromised by the wind turbine development of such proximity and scale.



The 17th century Carlanstown Bawn (source Archaeology.ie)

Mitigation of archaeology along the grid connection route

The applicant's EIAR looked closely at archaeological features in the townlands of the grid route and the 15 wind turbines.

¹¹ EIAR Chap 13.58

The approach to mitigation is, however, inadequate. The applicant states that when any archaeology is likely to be found, they will monitor the works. This means that an archaeologist would be present to observe the works and if they spot anything, they would intervene and conduct an archaeological excavation. The exact words in the document are as follows-

"A report on the results of monitoring shall be completed and submitted to the relevant authorities on completion of the project".¹²

The suggestion that the authorities would be informed AFTER the event is inadequate; the authorities should be informed immediately so they have an opportunity to attend onsite and form their own judgements.

MAYNE church deserves further examination within the mitigation proposals

In particular, Mayne graveyard deserves closer attention than proposed. Along with the upstanding church and font, there are the likely remains of an Early Christian ecclesiastical enclosure. In 1980, the Archaeological Survey of Ireland noted

"That the curve in the graveyard wall from ENE to NNE may suggest that this section of graveyard wall follows the line of an earlier graveyard enclosure (SMR file 05/03/1980)."

The RMP tells us that "The C of I church standing in the N of the graveyard may have been built on the site of or incorporated fabric from a medieval church (WM003-083----) recorded in 1837 as located 'on the lands of Mayne stand the ruins of the ancient church' (Lewis 1837, 349)."

Evidence of Christianity is found in Ireland from at least the early fifth century and became predominantly monastic. These early monasteries were generally surrounded by an outer circular enclosure, the vallum, with an inner enclosure surrounding the church and graveyard. In the eight century monasteries expanded to include larger communities among them married lay people, housed in wooden buildings within the outer enclosure.

It is likely that this type of enclosure surrounded the ancient church at Mayne and may well have encompassed a wider area than currently contained by the graveyard and may well be covered by the current public road, L 1826.

This possibility should be archaeologically tested prior to any construction.

Adverse effect, not "slight" on nearby archaeology and tourism at Loughcrew, Co. Meath
Meath County Council submitted a letter to the consultants in which the Council requested that the impact of the Coole Windfarm "does not adversely impact upon the amenity and experience of this important visitor attraction and archaeological site". They express concern on the visibility of the Windfarm from such a major site.

Photomontage 11 demonstrates clearly that the turbines will be very visible from Loughcrew and will visually detract from the visiting experience and cultural heritage.

¹² EIAR Chap 13, page 126

Photomontage no 11 shows Sliabh na Calliagh / Lough Crew 15.9km east of the proposed industrial wind farm. In the photomontage, the turbines are rendered in dark grey to make them blend into the skyline and landscape. They are still clearly visible in this photomontage and would be more so in real life standing as tall and taller than the local landmarks.

The 5000 year old Loughcrew Stone Age Cairns are spread across the hills at Loughcrew and make up one of the three main concentrations of Passage Tombs in Ireland, the others are Brú na Bóinne (Newgrange, Knowth & Dowth) and Sligo (Carrowkeel & Carrowmore).

The Equinox sunrise illuminates Cairn T at Loughcrew, similar to the famous Solstice illuminations at Newgrange. This is a major archaeological site and the Windfarm is only 9km distant and visible from the 276m high hills.

The applicant's EIAR¹³ classifies the sensitivity of the turbine effect on Loughcrew as "High". The same applies to Fore Abbey. Both sites are National Monuments. The EIAR then inexplicably states that the negative impact will be "Slight".

As an archaeologist, I disagree with this subjective view. The impact of 15 giant industrial wind turbines on this countryside and its heritage will be significant and damaging to its amenity and tourism value.

In my view, far from diminishing or justifying the visual damage from the turbines, the photomontages only serve to clearly demonstrate the nature and the extent of this damage, affecting community life and tourism adversely.

The "receptors" are not the inanimate monuments; they are the community

The EIAR shows its technical basis in stating that "the receptors" of the cumulative negative impacts are "the archaeological monuments and architectural/cultural heritage sites".¹⁴

The "receptors" will actually be the community, its heritage and the tourism potential of the areas, not inanimate monuments. This statement shows an extraordinary technically-led blindness to the "cumulative impact" of this proposed development on people and the tourism economy.

As the EIAR further states "The ZTV shows that the proposed turbines will be theoretically visible from the majority of cultural heritage assets within 5km of the nearest proposed turbine."

There are at least 15 homes located within 1km of any turbine and most of these homes are surrounded by multiple turbines. Where are the photomontages showing the visual impact on these homes which are owned and lived in by local people living ordinary lives?

Look at the view!

Our heritage and our landscape are key to community identity and to tourism. If you stand on the hills above Fore, at the remains of the prehistoric barrow cemetery known as Gallagher's Moteen, (td. Lakil and Moortown), you realise that you are standing in the

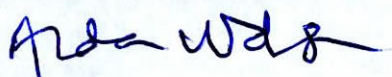
¹³ EIAR Chap.13.145

¹⁴ EIAR Chap 13, page 168

centre of a series of hills that form a continuous and largely contemporary archaeological landscape. To your east you see the great passage tomb cemetery at Loughcrew, to your west stands the Hill of Mullaghmeen with its cairn, one km to its south another cairn and fort in Carn town land and slightly further to the west the Hill of Mael/Maol with its fort and cairn. All inter-visible, all ancient; the atmosphere is palpable. This is what tourists come for. This is what we celebrate as our heritage. How can an over-scaled industrial wind farm, as high as the hills, be permitted in such a landscape?

For the many reasons presented above, I wish to restate my objection to this application and ask ABP to refuse it.

I enclose a cheque in the amount of €50, being the prescribed fee for making this submission / observation.

A handwritten signature in blue ink, appearing to read 'Aidan Walsh'.

Aidan Walsh