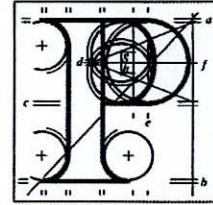


**Our Case Number: ABP-316051-23**



**An  
Bord  
Pleanála**

Development Applications Unit  
Newtown Road  
Wexford  
Co. Wexford  
Y35 AP90

**Date:** 09 May 2023

**Re:** Renewable energy development comprising 9 no. wind turbines and associated infrastructure.  
Umma More and adjacent townlands, County Westmeath.

Dear Sir / Madam,

An Bord Pleanála has received your 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 in respect of this 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](http://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

PA09

**Tel**  
Glao Áitiúil  
**Facs**  
Láithreán Gréasáin  
Ríomhphost

**Tel**  
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(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

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

## Niamh Thornton

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**From:** SIDS  
**Sent:** Friday 5 May 2023 10:01  
**To:** Niamh Thornton  
**Subject:** FW: Your ref: ABP-316051-23 Our Ref: SID-WM-2023-007 ABP-316051-23 Ref: 201050  
**Attachments:** SID-WM-2023-007.pdf

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**From:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Sent:** Thursday 4 May 2023 17:07  
**To:** SIDS <sids@pleanala.ie>  
**Subject:** Your ref: ABP-316051-23 Our Ref: SID-WM-2023-007 ABP-316051-23 Ref: 201050

A Chara,

Attached please find the Heritage related observations/recommendations of the Department in relation to the aforementioned SID Planning Application. The person responsible for this area in our NPWS section is unavailable at the moment so unfortunately we are unable to issue any observations today from them. Would it be possible to get an extension of two weeks in order for the Department to submit Nature Conservation observations?

Please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie)

Kind regards,

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**Edel Griffin**  
*Executive Officer*

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**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
*Department of Housing, Local Government and Heritage*  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90





Your Ref: 201050

Our Ref: SID-WM-2023-007

*(Please quote in all related correspondence)*

4 May 2023

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902  
Via email to [sids@pleanala.ie](mailto:sids@pleanala.ie)

Re: Notification under the Planning and Development Act, 2000, as amended.

**Proposed Strategic Infrastructure Development (SID):** i. 9 No. wind turbines with an overall ground-to-blade tip height of 185 metres; a rotor blade diameter of 162 metres; and hub height of 104 metres, and associated foundations and hard standing areas; ii. A thirty-year operational life from the date of full commissioning of the wind farm and subsequent decommissioning; iii. A meteorological mast with a height of 30 metres, and associated foundation and hard standing area; iv. Junction accommodation works and temporary access roads to facilitate turbine delivery to an existing entrance on L5363. v. Upgrade of existing entrance on L5363 for provision of site entrance; vi. Upgrade of existing tracks/ roads and provision of new site access roads, junctions and hardstand areas; vii. Underground electrical (33kV) and communications cabling; viii. A temporary construction compound; ix. Spoil Management; x. Site Drainage; xi. Tree Felling; xii. Operational stage site signage; and xiii. All ancillary works and apparatus in the townlands of Ballynafearagh, Raheen, Baskin High, Baskin Low, Lissanode, Umma Beg or Moneynamanagh, Umma More in County Westmeath

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department co-ordinated by Development Applications Unit under the stated heading(s).

### **Archaeology**

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application includes a desk-based Archaeological Impact Assessment (AIA) which was carried out in relation to the proposed development by Tobar Archaeological Services (EIAR Chapter 13; date 10 March 2023). The Department has reviewed the EIAR and is





broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

However, issues of particular concern remain unresolved in relation to the likely effect of this development to the Hill of Uisneach, elements of which are a National Monument in the ownership of the Minister, and which is also included on the current World Heritage Tentative List as part of the Royal Sites of Ireland. These concerns relate to:

- 1) **Potential deficiencies in the overall methodology and scope for the AIA:** The EIAR only references the deprecated 2010 World Heritage Tentative List. The current Tentative List for Ireland was published in August 2022 and should be the basis for any assessment. In that regard, the EIAR does not address the likely effects of the proposed development to the potential Outstanding Universal Value (OUV) of the Hill of Uisneach as currently defined (see:

<https://worldheritageireland.ie/tentative-property/the-royal-sites-of-ireland/#tp-outstanding>).

The Royal Sites of Ireland are not yet formally designated as a World Heritage Site, however, it would still be best practice for the EIAR for any project with potential effects to such a site to have regard to the UNESCO *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (<https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>) and (in the context of a wind energy project) the UNESCO *Guidance for Wind Energy Projects in a World Heritage Context* (<https://whc.unesco.org/en/wind-energy>). Neither set of guidance has been consulted or integrated into the methodology for this EIAR.

- 2) **Limitations in the Landscape Visual Impact Assessment (LVIA) as carried out:** No photomontages were prepared for views from the Hill of Uisneach and the assessment relies on a digitally rendered wireframe model only. While it is noted that this is the result of circumstances not in the control of the applicant, the Department is concerned that the level of assessment may not be sufficient in the context of the sensitivity of the Hill of Uisneach site and its wider cultural landscape setting.

The Hill of Uisneach is one of six focal sites within the group listing for the Royal Sites of Ireland which has been included in the current Tentative List for inscription as a World Heritage Site. It is considered to be the symbolic central point of Ireland and incorporates a multi-period archaeological complex including eight barrows (WM024-173---; WM024-195---; WM024-061---; WM024-058---; WM024-202---; WM024-030---; WM024-025---; WM024-063---; WM024-176---), six ring-ditches (WM024-194---; WM024-197---; WM024-198---; WM024-199---; WM024-200---; WM024-201---), a megalithic tomb (WM024-059---





—), two standing stones (WM024-060001-; WM024-192—), four enclosures (WM024-059001-; WM024-059002-; WM024-068—; WM024-187—), six ringforts (WM024-028—; WM024-027—; WM024-062—; WM024-066—; WM024-066001-; WM024-069—), four souterrains (WM024-028003-; WM024-028004-; WM024-066003-; WM024-066005-) and two holy wells (WM024-060—; WM024-193—). Elements of the complex are a National Monument in the Ownership of the Minister for Housing, Local Government and Heritage (Monument No. 155). These monuments are subject to statutory protection in the Record of Monuments and Places established under Section 12 and also Section 14 of the National Monuments (Amendment) Act 1930-2014.

The Hill of Uisneach was a focal point in the landscape of late prehistoric and early historic Ireland. A key attribute of the monument complex at the site—and central to its potential OUV—is its prominent hilltop location, providing a visual focus for a wider cultural landscape. The panoramic views afforded of this surrounding cultural landscape are important to the authenticity of the site in the present day. It is important that any potential effects to the visual links between the Hill of Uisneach and its cultural hinterland are adequately understood and assessed to ensure that the integrity of this relationship is preserved and protected through informed decision-making.

If Further Information is being requested by the Board, it may be beneficial to consider including clarification of the aforementioned points as part of the request.

Notwithstanding this, the Department advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

#### **Archaeological Requirements:**

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 13 of the EIAR (Tobar Archaeological Services; date 10 March 2023) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. A suitably qualified archaeologist shall be retained to advise on, and establish minimum 30m radius concentric Buffer Zones around the external-most elements of all known archaeological sites within or in close proximity to the development site as set out in Chapter 13 of the EIAR.





- a. Buffer Zones shall be fenced off for the duration of construction works in the vicinity of the monuments.
  - b. No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Buffer Zones.
3. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance within the wind farm site and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with this Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
  - a. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.
  - b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service, shall be complied with by the developer.
  - c. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.
4. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 13 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
5. The planning authority and this Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any



archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

**Reason:** To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie), or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

A handwritten signature in dark ink, appearing to read 'Julie Sullivan', located above a horizontal line.

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Julie Sullivan  
Assistant Principal  
Development Applications Unit  
Administration