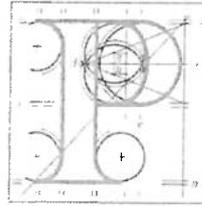


Our Case Number: ABP-316212-23



An
Bord
Pleanála

Nora Fagan
Solicitor
Ballymore
Mullingar
Co. Westmeath

Date: 22 February 2024

Re: Proposed development of 26 no. wind turbines and associated works.
at the Ballivor Bog Group, Co. Meath and 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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 the local authority 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,



Ashling Doherty
Executive Officer
Direct Line: 01-8737160

PA04

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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

To: An Bord Pleanála, 64 Marlborough St., Dublin 1.

Re Strategic Infrastructure Application Ref No: ABP: 316212-23.

Applicant: MKO on behalf of Bord na Mona.

Wind Farm at Ballivor on Meath/Westmeath Border.

11th February, 2024

Dear Sir/Madam,

I refer to the Strategic Infrastructure Status which is sought by MKO Developments for the development of a wind farm in Ballivor on the Meath/County Westmeath border. I note that the applicants contend that this windfarm which will comprise 26 turbines with a blade tip height of 200 metres and a rotor height of 170 metres (hereinafter called 'the Windfarm') should be afforded strategic infrastructure development status in accordance with section 37A (2)a of the Planning and Development Act, 2000, as amended.

I note that An Bord Pleanála have now sought further observations / information on this application.

As a resident that lives within close proximity to the Hill of Uisneach in County Westmeath, I note that the proposed application makes limited references to the impact of this Windfarm on the intervisibility between the two royal sites of Tara and Uisneach.

According to the Heritage Council, the Royal Sites are described as being "situated on strategic and elevated locations, the Royal Sites are organically evolved relict cultural landscapes where the pre-Christian kingship in Ireland evolved (Heritage Council, 2016, p.2).

As already highlighted by both Meath County Council and the Office of Public Works, these sites have been included on the 2022 World Heritage Tentative List which has been sent to UNESCO in Paris. As world heritage sites, this means that not only the site itself but the wider landscape in which they rest and any potential threats to that landscape are major considerations.

By virtue of their significance on this tentative list, I would also concur with the initial concerns expressed by both the Office of Public Works and Meath County Council that the proposed planning application does not employ the tools provided by the UNESCO Guidance for Wind Energy Projects in a World Heritage Context.

I note that MKO fail to address these concerns in their subsequent response to An Bord Pleanála.

There is a direct cultural correlation between the Hill of Uisneach and Tara, which is the main criteria for their selection for World Heritage Status. One of the most notable and renowned practices associated with Uisneach, which reflects both the

relationship to other sites and the importance of inter visibility, is the lighting of fires at Bealtaine. According to mythology, the first primeval fire seen for the first time over the four provinces of Ireland was lit by a druid Midhe, at Uisneach. The first fires were lit at Bealtaine from Uisneach and once seen, subsequent fires were lit on the related royal sites summits all over the country (Schot,2011). This suggests that the intervisibility between the summits and its commanding views in the landscape certainly played a crucial role in this cultural practice and belief.

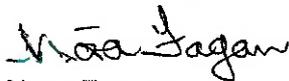
It is also noted that the applicants fail to refer to the Draft Revised Wind Energy Development Guidelines (December 2019) issued by the Department of Housing, Planning and Local Government. This document re-iterates the importance of the World Heritage Sites and also the sites which were placed on Ireland's tentative list. These draft guidelines highlight the importance of ' intervisibility and interrelationships between archaeological heritage within the wider landscape, including cross-border intervisibility and interrelationships.'

Uisneach measures approximately 180 metres in height; The Hill of Tara measures approximately 155 metres; The proposed windfarm will be located directly between both sites. The proposed windfarm with an overall blade tip height of 200 metres and blade rotor diameter of 170 metres will undoubtedly dominate the landscape within which both of the Royal sites are situate, interfering with both the intervisibility and inter-relationship between both sites.

In addition, I also note that the applicants fail to mention that the entire 360-degree panoramic view from the summit of Uisneach is classified as having 'National Importance' in the Westmeath County Development Plan. This panoramic aspect contributes greatly to the historical interpretation and cultural importance of Uisneach, within the landscape.

On this basis, I would submit with respect that this windfarm development is not afforded Strategic Infrastructure Status.

Yours faithfully,



Nora Fagan,

Ballymore,

Mullingar,

Co. Westmeath.

The Heritage Council (2016), *Conservation Plan for the Hill of Uisneach. Part 1, Assessment of Cultural Significance. Dublin: Department of the Heritage, Arts and the Gaelteacht*

Schot, R. (2011). From cult centre to royal centre: monuments, myths and other revelations at Uisneach. In R. Schot, C. Newman and E. Bhreathnach (eds), *Landscapes of cult and kingship*, 87– 113. Dublin.