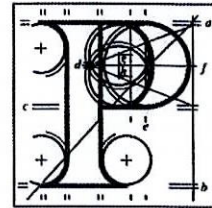


Our Case Number: ABP-316212-23



**An
Bord
Pleanála**

Office of Public Works
1GQ George's Quay
Dublin 2
D02 Y098

Date: 08 June 2023

Re: Proposed development of 26 wind turbines and associated works
at the Ballivor Bog Group, County Meath and 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.

There is no fee for a prescribed body to make a submission on this case. A refund of €50 will be issued to the debit/credit card used to make payment for this submission.

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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

PA09

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Glao Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An Bord Pleanála
64 Marlborough Street
Dublin 1

2nd June 2023

Re: The construction of 26 No. wind turbines and all associated hard-standing areas with the following parameters: a. A total blade tip height of 200m, b. Hub height of 115 metres, and c. Rotor diameter of 170 metres. ii. 2 No. permanent Meteorological Anemometry Masts with a height of 115 metres and associated hardstanding area and removal of existing meteorological mast. iii. 4 No. temporary construction compounds with temporary site offices and staff facilities, in the townlands of Bracklin and Grange More. iv. 5 No. temporary security cabins at the main construction site entrances and access points around the site, in the townlands of Killagh, Grange More and Coolronan. v. 2 No. borrow pits located in the townland of Grange More and Craddanstown and all works associated with the opening, gravel and spoil extraction, and decommissioning of the borrow pits. vi. 1 No. permanent 110 kV electrical substation, which will be constructed in the townland of Grange More. The electrical substation will have 2 No. single storey control buildings, a 36 metre high telecom tower, associated electrical plant and equipment, a groundwater well and a wastewater holding tank. vii. All associated underground electrical and communications cabling connecting the turbines and masts to the proposed electrical substation, including road crossings at R156 and a local road between Lislogher and Bracklin Bogs, and all works associated with the connection of the proposed wind farm to the national electricity grid, which will comprise connecting into the existing Mullingar – Corduff 110 kV overhead line that traverses the site. viii. Provision of new internal site access tracks with passing bays measuring a total length of c. 28km and provision/upgrade of existing/new pathways for amenity uses measuring a total length of c. 3.3km and associated drainage. ix. Temporary accommodating works to existing public road infrastructure to facilitate delivery of abnormal loads at locations on the R156 and R161 in the townlands of Doolystown and Moyfeagher. x. Accommodating works to widen existing site entrances off the R156 into Ballivor and Carranstown Bogs and reopen entrances at Lislogher and Bracklin Bogs for use as construction site entrances and to facilitate delivery and movement of turbine Application Form for Permission / Approval in respect of a Strategic Infrastructure Development Page 9 of 22 components and construction materials; Entrances will be used for maintenance and amenity access during the operational period. xi. Permanent vertical realignment of the R156 in the vicinity of the site entrance to achieve required sight lines. xii. Construction of permanent site entrances off a local road into Lislogher and Bracklin Bogs to facilitate a crossing point for turbine components, construction materials and operation/amenity access. xiii. Provision of amenity access and amenity pathways using existing entrances off the R156 and local roads in the townlands of Bracklin, Coolronan, Clondalee More and Craddanstown. xiv. 3 No. permanent amenity carparks in Ballivor Bog (50 no. car parking spaces), Carranstown (15 no. car parking spaces) and Bracklin Bog (15 no. car parking spaces) and the provision of bicycle rack facilities at each location. xv. All associated site works and ancillary development including access roads, drainage and signage. xvi. A 10-year planning permission and 30-year operational life of the wind farm from the date of commissioning of the entire wind farm.

A chara,

The Office of Public Works (OPW) wishes to make the following observations on the above referenced planning application.

1.0 INTRODUCTION

The Office of Public Works (OPW) is a central Government Office operating under the Minister for Public Expenditure and Reform with particular responsibility for Flood Risk and Estate Management, including Heritage.

2.0 THE ROLE OF THE OPW

The Minister for Housing, Local Government and Heritage owns National Monuments in State Care; the OPW is responsible for the care and maintenance of National Monuments in Ownership or Guardianship on behalf of the Department of Housing, Local Government and Heritage (DHLGH).

The OPW has concerns that the development, as proposed, may have a negative visual impact on the setting of, significance of, and the views from, and to, the following National Monuments: Hill of Tara, Loughcrew/Slieve na Calliagh, Trim Castle, Delvin Castle, Donore Castle, Frewin Hill and Raharney Ringfort. The OPW is very concerned about the impact on the O.U.V. (Outstanding Universal Value) of the Hill of Tara.

3.0 ASSESSMENT OF IMPACT

3.1 Hill of Tara (25.8km from nearest turbine)

Designations (non-exhaustive)

1. UNESCO World Heritage Tentative List The Royal Sites of Ireland

As one of the 'Royal Sites of Ireland' (with the Hill of Uisneach, Navan Fort, Dún Ailinne, the Rock of Cashel, and Rathcroghan), The Hill of Tara is part of a proposed serial nomination for UNESCO World Heritage Property status, entered on the list in 2010, and confirmed on the nomination list in July 2022. The most recent Tentative List submission to the DHLGH describes the potential Outstanding Universal Value (OUV) in the following terms:

'All of the Royal Sites form part of larger archaeological landscapes characterised by a large concentration of ritual monuments demonstrating in physical form the development of power, ceremony and religion in a Celtic society. Situated on strategic and elevated locations, the Royal sites are directly associated with Irish mythology and traditional beliefs and continue to represent spiritual and symbolic centres of Irish culture and identity, which have influenced approaches to life in many countries of the world. ...The Sites all retain their prominent hill-top positions with panoramic views across their surrounding cultural landscapes. All the sites are characterised by surviving prehistoric and early medieval earthworks and masonry

monuments. Their overall authenticity is high. ...the visual links between each Royal Site and its cultural hinterland remain intact, despite occasional intrusions.’¹

2. National Monuments in State Care No. 676, 148, multiple SMRs/RMPs
3. Panoramic view, protected in Meath County Development Plan 2021-27 (MCDP 2021-27) as M-V44, designated National Significance and described as follows:
‘Views across settled landscape with visible development including foreground powerlines, agricultural buildings, houses, quarries and roads. View to the west: other prominent hilltops visible at great distance. Foreground contains extensive areas of hedgerows and woodland. View to the south: Wicklow and Dublin Mountains visible on horizon. Relatively little development visible. Substantial woodland in the foreground. View to the east: across settled working landscape with a variety of structures and development visible including historic structures such as Skryne. Distant industrial plants. View to the north: panoramic views into very distant horizons. Encompassing a settled landscape with many buildings and structures visible in near and middle distance. Note areas immediately below hill to the north and south are obstructed by topography at variance with protection plan.’
4. Landscape Character Assessment (LCA) MCDP 2021-27 – Exceptional Value, of National/ International Importance and of High Sensitivity.
5. HER POL 54, MCDP 2021-27: To protect the archaeological heritage, rural character, setting and amenity of the Tara landscape and Loughcrew and Slieve na Calliagh Hills.

Stated Impact (per EIS)

Ref. Photomontage VP.02: ‘Whilst the proposed turbines will be visible from elevated vantage points on the Hill, the proposed turbines will not alter the immediate setting, appearance and context of monuments at the Hill of Tara and its immediate landscape’ Appendix 13-3 states that ‘the permitted Bracklyn and Ballivor turbines appear as one coherent wind farm from this viewpoint location with very little different in scale and size.’ It states that the Residual Effect of the two windfarms will be Slight, defined as ‘an effect which causes noticeable changes in the character of the environment without affecting its sensitivities.’ (EPA, 2022)

OPW Observations

The Hill of Tara is an exceptionally rich cultural landscape affording extensive panoramic views. Issues of concern include the impact on the setting, association and meaning of the Hill of Tara. The *Burra Charter* (ICOMOS 2013) informs us that: ‘cultural significance is embodied in the *place* itself, its *fabric*, *setting*, *use*, *associations*, *meanings*, *records*, *related places* and *related objects*’ (1.2), that ‘*setting* may include: structures, spaces, land, water and sky; the visual setting including views to and from the place, and along a cultural route; and other sensory aspects of the setting such as smells and sounds. Setting may also include historical and contemporary relationships, such as use and activities, social and spiritual practices, and relationships with other places, both tangible and intangible’. The *Burra Charter* informs us that ‘*associations* mean the connections that exist between people and a *place*’, (1.15) and that ‘*associations* may include social or spiritual values and cultural responsibilities for a place,’ and that ‘*meanings* denote what a place signifies, indicates, evokes or expresses to people’ (1.16).

¹ <https://worldheritageireland.ie/tentative-property/the-royal-sites-of-ireland/>

Based on Photomontage VP.02, the OPW is concerned that the 26no. 200m high plus 9 no. 185m high turbines, the latter already permitted, will feature prominently as very large manmade objects in the views to the west of the Hill of Tara. Being manmade objects, white and rotating, they will draw the eye and become the focus of that view. Their other effect is to alter the perceived scale of the landscape.

The planning application does not refer to World Heritage Tentative List status or proposed OUV detail; nor does it employ the tools provided by *UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context* or the tool *UNESCO Guidance for Wind Energy Projects in a World Heritage Context* to assess the impact of the windfarm on the WH Tentative List property. The OPW recommends that these tools are employed in relation to the potential impact on the Hill of Tara.

3.2 Loughcrew/Slieve na Calliagh (approx. 17km from nearest turbine)

Designations (non-exhaustive)

1. UNESCO World Heritage: Note the following from LCA 19 MCDP 2021-27:

‘This LCA is of National / International Importance. At present it does not meet the full criteria for International Importance (page 4) but it does have sufficient landscape heritage merit to warrant its promotion as an international attraction and an application for a[n] international designation by UNESCO.’
2. National Monuments in State Care No. 290, 155, within an archaeological landscape containing a very large number of SMRs/RMPs
3. Panoramic view, protected in MCDP 2021-27 as M-V6, designated National Significance and described as follows: ‘Panoramic views in all directions including intervisibility between the 3 peaks. Site of high cultural and scenic significance characterised by absent or very low levels of enclosure.’
4. LCA 19 MCDP 2021-27 - Exceptional Value, of National/International Importance and of High Sensitivity. Policy no.1 in the LCA is:

‘Submit an application to UNESCO for an International Designation. Once this has been lodged, there is a strong case for treating the site as a ‘Potential Site of International Importance’ and putting in place policies that will afford it protection in keeping with this status. In our opinion the Loughcrew Hills are worthy of an application on the basis of their rarity, scale, age and undoubted importance in Irish history.’
5. HER POL 54, MCDP 2021-27: To protect the archaeological heritage, rural character, setting and amenity of the Tara landscape and Loughcrew and Slieve na Calliagh Hills.

Stated Impact (per EIS)

Ref. Photomontage VP.02: ‘Whilst the proposed turbines will be visible from elevated vantage points on the Hill, the proposed turbines will not alter the immediate setting, appearance and context of monuments at the Hill of Tara and its immediate landscape’ Appendix 13-3 states that ‘the permitted

Bracklyn and Ballivor turbines appear as one coherent wind farm from this viewpoint location with very little different in scale and size.' It states that the Residual Effect of the two windfarms will be Slight, defined as 'an effect which causes noticeable changes in the character of the environment without affecting its sensitivities.' (EPA, 2022)

OPW Observations

Based on Photomontages VP.11 and VP.12, the OPW is concerned that the 26no. 200m high plus 9 no. 185m high turbines, the latter already permitted, will feature prominently as very large manmade objects in the views to the south of Loughcrew/Slieve na Calliagh. Being manmade objects, white and rotating, they will draw the eye and become the focus of that view. Their other effect is to alter the perceived scale of the hinterland landscape. It is worth noting that the turbines will be higher than Slieve na Calliagh, the highest hill in Meath. The landscape surrounding Loughcrew/Slieve na Calliagh is currently rural and unspoilt in character. OPW considers it unfortunate that Bracklyn Windfarm was granted permission despite its impact on this (inter)nationally significant cultural landscape. The OPW asks An Bord Pleanála to take into consideration the OPW's concerns about the potential impact of 35no. turbines (Ballivor 26no. plus Bracklyn 9no.) in this very sensitive and internationally important viewshed.

The OPW notes that VP.12 (Patrickstown) shows the visual impact of the turbines more clearly than VP.11. In the latter, the blades are rendered almost invisible against the sky.

The OPW requests that if ABP are requesting additional information, that the World Heritage assessment tools: *UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context* or the tool *UNESCO Guidance for Wind Energy Projects in a World Heritage Context* are employed by the applicant in relation to the potential impact on Loughcrew/Slieve na Calliagh.

3.3 Trim Castle (approx. 14.5km from nearest turbine)

Designations (non-exhaustive)

National Monument in State Care No. 514

Architectural Conservation Area

Stated Impact (per EIS)

Photomontage Viewpoint 19 shows full visibility. All of the Ballivor (and Bracklyn) turbines will be visible from the upper floor of the castle. Cumulative Impact: that the proposed Ballivor turbines will be visible along with the permitted Yellow River turbines (albeit at a distance), the proposed Milltown Pass turbines and the permitted Bracklyn turbines. This will result in cumulative effects on setting of Moderate Effect.

OPW Observations

The OPW is concerned about the (cumulative) visual impact of the Ballivor (and Bracklyn) windfarms from rooftop/wall walk level at this important heritage and tourism site.

3.4 Delvin Castle (5km from nearest turbine)

Designations (non-exhaustive)

National Monument in State Care No. 481

Stated Impact (per EIS)

The viewshed results and Zone of Theoretical Visibility (thereafter ZTV) shows full visibility of 21-26 of the turbines, with T20 seen in full (from base to tip height), the remainder visible approximately from mid-shaft upwards. 12.4.5.3.1 states that 'the visual amenity of the castle is intrinsically linked to its Urban Setting in which is located and therefore potential impacts are considered to be slight.'

OPW Observations

The OPW notes the close proximity of the proposed windfarm to Delvin Castle and the extensive theoretical visibility of the turbines. The OPW is concerned about the visual impact of the Ballivor windfarms and the likely cumulative impact with Bracklyn Windfarm (permitted).

The OPW requests that, if ABP is seeking additional information, that a Photomontage/VP is submitted with analysis of impact.

3.5 Donore Castle (4.6km from nearest turbine)

Designations (non-exhaustive)

National Monument in State Care No. 232

Stated Impact (per EIS)

The ZTV shows that potentially 21 to 26 turbines may be seen from this location: Turbines T1 - T12 may be seen from Donore Castle from approximately mid-shaft upwards; only the upper portion of turbines (T13-T21) may be seen; and turbines T22-T26 may have no visibility. The theoretical effects on setting will be slight/moderate when the proposed project is considered together with the (permitted) Bracklyn turbines. Some Yellow River turbines and 1 proposed Ballydermot turbine also fall within the theoretical visible areas (viewshed) 20km from the monument, situated in the opposite direction to the Ballivor turbines when viewed from the castle.

OPW Observations

The OPW notes the close proximity of the proposed windfarm to Donore Castle and the extensive theoretical visibility of the turbines. The OPW is concerned about the cumulative visual impact of the Ballivor and Bracklyn (permitted) windfarms, also taking into account Yellow River viewed from the opposite side of the castle.

The OPW requests that, if ABP is seeking additional information, that a Photomontage/VP is submitted with analysis of impact.

3.6 Frewin Hill (Wattstown) (23km from nearest turbine)

Designations (non-exhaustive)

National Monument in State Care No. 481

From the application: 'A recent study of prehistoric burial mounds in County Westmeath undertaken by Dr. David McGuinness (2012 and 2014) has added significantly to the understanding of these monuments and their potential inter-visibility with and relationship to other important ritual sites such as the Hill of Uisneach and the passage tombs of Loughcrew. ...This inter-visibility may be regarded as an important aspect of these monuments and their relationship with similar monuments and sites in the surrounding landscape.'

Stated Impact (per EIS)

Referencing VP08, the EIS states: 'the Proposed Turbines are visible behind Lough Owel, in the background of the image and will not alter the character, immediate setting and appearance of the High Amenity Area. There will be a negligible magnitude of change to the character and setting of these receptors and no significant landscape effects will occur.' 'all turbines will be visible at a distance at various turbine heights.' In clear weather conditions: 'three turbines will be visible from approximately mid shaft upwards (T01 and T11-T12). Only the upper portions of the remaining turbines may be visible from the top of Frewin Hill.' 'effects may increase from Slight when considering Ballivor turbine alone to Slight/moderate when considering Ballivor and Bracklyn.'

OPW Observations

3.7 Raharney Ringfort (4.3km from nearest turbine)

Designations (non-exhaustive)

National Monument in State Care No. 572

Stated Impact (per EIS)

All 35no. are visible, with possibly 4no. seen in full height – base to tip

OPW Observations

The OPW requests that, if ABP is seeking additional information, that a Photomontage/VP is submitted with analysis of impact.

4.0 CONCLUSION

The OPW is very concerned about the impact on protected panorama views from the internationally significant cultural landscapes of Loughcrew/Slieve na Calliagh and the Hill of Tara. The OPW is also very concerned about the visual impact on the rooftop views from Trim Castle, a highlight of this popular tourist destination. The OPW is concerned that World Heritage impact assessment toolkits have not been employed to assess the impact on the OUV at the Hill of Tara.

The OPW requests that An Bord Pleanála seek Additional Information from the applicant to demonstrate implementation of best practice in regard to World Heritage properties, and give strong consideration to the issues raised by the OPW in this submission in their determination of this planning application, in particular in relation to the impact on Loughcrew/Slieve na Calliagh.

If further information or input is required from the items raised in this submission, please do not hesitate to contact the OPW at: info@opw.ie.

Yours sincerely,

Rosemary Collier
Head of Heritage Services and Capital Works Delivery