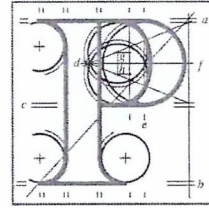


**Our Case Number:** ABP-317809-23



**An  
Bord  
Pleanála**

Development Applications Unit  
Government Offices  
Newtown Road  
Co. Wexford  
Y35 AP90

**Date:** 11 October 2023

**Re:** Proposed Coolglass windfarm and related works  
In the townlands of Fossy Upper, Aghoney, Gorreelagh, Knocklead, Scotland, Brennanshill,  
Monamantry, Coolglass, Crissard and Kylenebehy, Co. Laois.

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.

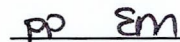
The Board will revert to you in due course in respect of this matter.

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 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](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned officer of the Board or email [sids@pleanala.ie](mailto:sids@pleanala.ie) quoting the above mentioned An Bord Pleanála reference number in any correspondence with the Board.

Yours faithfully,



Evan McGuigan  
Executive Officer  
Direct Line:

PA09

Executive Officer  
Direct Line:

PA04

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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

**Evan McGuigan**

---

**From:** LAPS  
**Sent:** Friday 6 October 2023 09:42  
**To:** SIDS  
**Subject:** FW: Coolglass Wind Farm SID Application  
**Attachments:** SID-LS-2023-030.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Sent:** Friday, October 6, 2023 9:29 AM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Coolglass Wind Farm SID Application

Dear Sir/Madam,

Please find attached heritage-related observations/recommendations for the above mentioned Coolglass Wind Farm SID Application.

Regards,

—  
**Brian Bone**  
*Executive Officer*

—  
**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, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90**  
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90

—

GL1283



**Your Ref:** SID-LS-2023-030

**Our Ref:** ABPE-ABPE-A230810-0040

*(Please quote in all related correspondence)*

6 October 2023

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Via email to: [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

<b>Proposed Strategic Infrastructure Development (SID): Coolglass Wind Farm SID Application</b>
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Dear Sir or Madam,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

**Archaeology**

Following appraisal of the application documentation and Environmental Impact Assessment Report (EIAR) and an inspection carried out by the National Monuments Service of the Department on 28 September 2023 of the general area within which the proposed development site (PDS) will be located, the following is the response of the Department of Housing, Local Government and Heritage. The Department considers that the EIA as submitted is inadequate and recommends it be revised to address more thoroughly the possible impacts on known and potential archaeology. The deficiencies as identified in the EIA are set out below.

The Department is, of course, fully supportive of the development of renewable energy capacity within the State but nevertheless must review particular proposals having regard to





their heritage impact. Issues of particular concern remain outstanding in relation to the likely effect of this development to the archaeological resource and in particular to two National Monuments:

**1. Potential deficiencies in the Methodology used for the EIA as it relates to Archaeology and Cultural Heritage**

- Review of the methodology used for the EIA in relation to Cultural Heritage indicates a potential over-reliance on desk-based research to inform the characterisation of the baseline environment.
- No site walkovers or direct inspection of the PDS was carried out and only limited inspections of certain cultural heritage assets in the wider landscape were carried out (see EIAR Section 11.2.10).

**2. Limited Visual Impact Assessment (with particular regard to National Monuments)**

- The PDS is located within 3 kilometres of Timahoe Church and Round Tower (NM No 114; RMP LA018-031002-; LA018-031005-) and Fossy Church (NM No 114; RMP LA019-016----). These are nationally important archaeological monuments in the ownership of the Minister for Housing, Local Government and Heritage.
- The Landscape and Visual Impact Assessment chapter of the EIAR presents only a single viewpoint and photomontage as a basis from which to assess of the visual impact of the proposed development to the National Monuments at Timahoe and Fossy.
- The Cultural Heritage chapter of the EIAR presents a narrative discussion of the potential impact on the setting of certain vulnerable monuments (including the church and round tower at Timahoe and the church at Fossy). However, this is not supported by any photographs or photomontages other than the single viewpoint (VP9 at Timahoe) prepared as part of the general Landscape and Visual Impact Assessment.
- Owing to the general deficiencies in the methodology for the EIA highlighted above, it is the opinion of the Department that the potential effects of this proposed development to these monuments have not been adequately assessed.



### **3. Proposed Development is Contrary to the Objectives of the Laois County Development Plan**

- The development, if permitted, would be in conflict with stated objectives for the protection of archaeological and cultural heritage and the proposed development is located in an area deemed 'Not Open for Consideration' for Wind Energy in the Development Plan.

#### **1. Potential deficiencies in the Methodology used for the EIA as it relates to Archaeology and Cultural Heritage**

An EIA must be informed by an adequate characterisation and understanding of the baseline environment within which a proposed development will be located. The evaluation of Archaeology and Cultural Heritage within this EIA relies almost entirely on desk-based research; it has not been informed by archaeological fieldwork. No site walkovers or direct inspection of the PDS was carried out. Only limited inspections of certain cultural heritage assets in the wider landscape were carried out (see EIAR Section 11.2.10). No other types of fieldwork or advance investigation/prospection were carried out to try to address or compensate for this deficiency.

The main rationale provided for the absence of fieldwork is that the PDS is heavily afforested. Review of aerial photography from August 2022 (see Google Earth) does show that much of the PDS was under dense forestry, however, many areas where access roads and support infrastructure are proposed were not under forestry, as well as a number of the turbine locations—T1, T5, T7 and T8. This indicates that a partial walkover survey might have been achievable.

Further, the absence of a walkover survey could have been compensated for, through the implementation of other prospection methods such as LiDAR survey at 0.5–1m resolution. LiDAR survey would allow for the potential identification of low-relief features and other upstanding remains of potential archaeological character to be identified even in areas of dense forestry.

The supporting information for the archaeological and cultural heritage baseline that was established is sparse. There is no overall gazetteer or master-list of archaeological and cultural heritage assets within the PDS and its wider landscape (the provided gazetteer in Appendix 11.1 is an incomplete listing with no descriptions of the assets). Only a single map drawing is provided to illustrate the assessment, there are no overlays of proposed development onto relevant historic mapping or aerial photography, for example. There are no photographs of any of the heritage assets and, in particular as already outlined, no





photographs to support the discussion of the potential impact to setting of vulnerable heritage assets.

## **2. Limited Visual Impact Assessment (with particular regard to National Monuments)**

Timahoe Church and Round Tower (NM No 114; RMP LA018-031002-; LA018-031005-) is located c. 2.5 kilometres northwest of the PDS. The monument has a strong amenity value because of its archaeological, architectural, artistic and historical importance. The round tower at Timahoe is one of the finest examples of its type and features the most decorative Romanesque doorway of any Irish round tower. The late medieval church here appears to retain parts of a Romanesque church and a later tower. While the monument is largely enclosed and surrounded by tall trees, the round tower remains a dominant feature in the wider landscape around Timahoe. This is particularly noticeable when approaching the village from the direction of Abbeyleix; the turnpike road (L3777) is aligned directly on the round tower. The tower is also prominent in the landscape on the main approach to the village, from M7/Portlaoise to the north along the R426 road.



*Plate 1—View east along L3777 turnpike road*

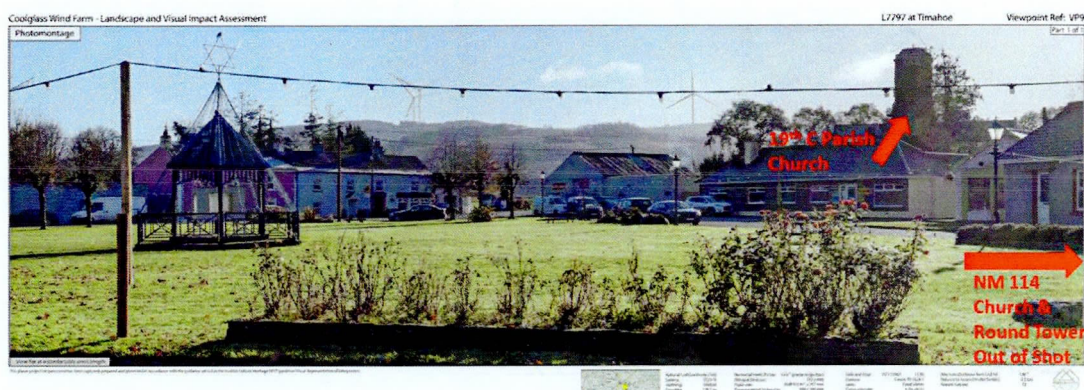
Fossy Church (NM No 114; RMP LA019-016----) is located c. 1.75 kilometres to the north of the PDS at the foot of Fossy Mountain where the northern group of turbines would be located. The upstanding remains comprise a late 16<sup>th</sup>-century parish church with undivided nave and chancel set within an enclosed graveyard. This was the medieval parish church. While the primary landscape relationships of this site historically were with the village of Timahoe to the northwest, the contemporary public amenity must also be considered. There are extensive views into the site from the local road L3840 to the north (due to its low-lying position), set against the backdrop of Fossy Mountain.





The Landscape and Visual Impact Assessment chapter of the EIAR presents only a single viewpoint (VP9) and photomontage as a basis from which to assess the visual impact of the proposed development to the National Monuments at Timahoe—Church and Round Tower (NM No 114; RMP LA018-031002-; LA018-031005-). None at all that are relevant for Fossy Church (NM No 114; RMP LA019-016----) or the motte and castle site at Ballinaclogh Lower (RMP LA024-015001-; LA024-015002-) that is subject to a Preservation Order (PO 4/1981) are included.

VP9 is located at the northeast side of the central green in the village of Timahoe, looking across that green towards the PDS. While the current 19<sup>th</sup>-century Catholic parish church in the village is within the viewshed for the photomontage, the site of the early medieval church and round tower is located further to the west, out of shot. No element of the National Monument appears in frame, however, the montage and supporting wireframe does indicate that at least four of the turbines will be prominent along the ridgeline of Fossy Mountain as viewed from the north and northwest.



*Plate 2—LVIA VP9 Photomontage with contextual notation*

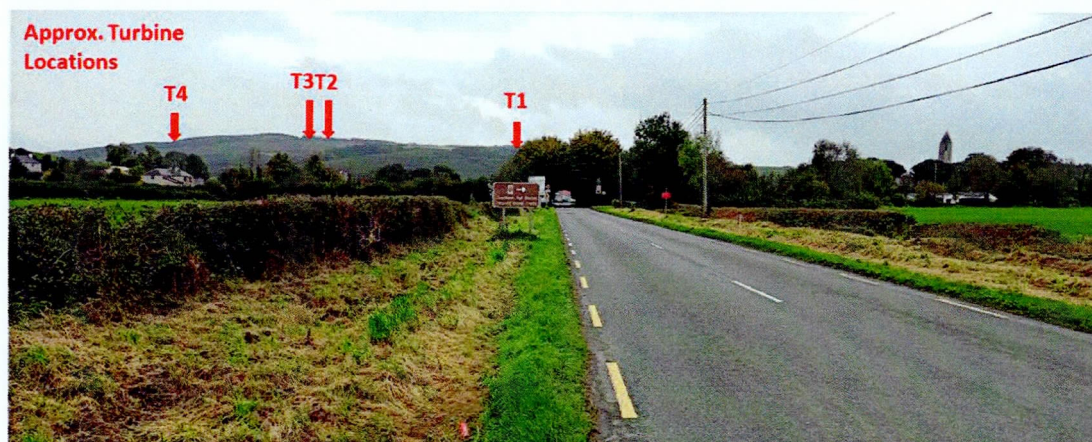
The Cultural Heritage chapter of the EIAR presents a narrative discussion of settings for all three monuments and the potential impact of the development to their setting. However, even though the chapter indicates that this narrative is based on a site inspection of each asset, no photographs, photomontages or other imagery have been provided to illustrate and support the assessment provided.

The inspection carried out by the National Monuments Service of the Department indicates that while the Department may concur with certain points made in relation to the vulnerability of these monuments to impacts on setting, the significance of the wider landscape setting of these monuments (and the vulnerability of that wider landscape setting) has been substantially understated in the EIAR. In this regard, the Department would draw particular





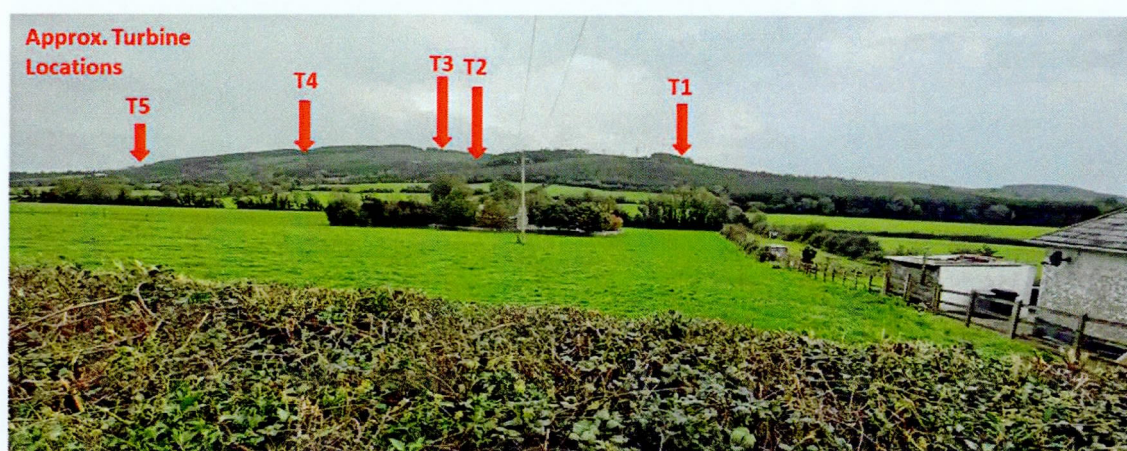
attention to the prominence and importance of the round tower at Timahoe in the landscape, as approached from the north along the R426 road.



*Plate 3—View south along R426, approximate locations of turbines based on EIAR*

While noting that the views towards Timahoe and the round tower along the L3777 road (former turnpike road) are more heavily screened by high hedgerows, the Department is concerned that the potential intrusion of turbines into this viewshed has not been adequately assessed. This road is oriented directly on the round tower as it approaches the village, framing the round tower with an uninterrupted view (see Plate 1 above).

As noted above, there are extensive views of Fossy Church from local road L3840 to the north, against the backdrop of Fossy Mountain. The introduction of turbines visible along the ridgeline of Fossy Mountain will substantially impact this wider landscape setting of the site and detract from the public amenity.



*Plate 4—View south from local road L3840 towards Fossy Church, approximate locations of turbines based on EIAR*





Given these potential significant vulnerabilities to impacts on setting, it is concerning to the Department that appropriately targeted visual impact assessment, including viewshed analysis and photomontages has not been appropriately carried out as part of the EIA.

### **3. Proposed Development is Contrary to the Objectives of the Laois County Development Plan**

The location of the proposed development in an area of archaeological remains and monuments of national, regional and local importance as outlined above would be contrary to a number of stated Objectives of the Laois County Development Plan 2021–2027, in particular:

- **AH 1** Manage development in a manner that protects and conserves the integrity and character of archaeological heritage of the county which avoids adverse impacts on sites, monuments, settings, features or objects of significant historical or archaeological interest and secure the preservation in-situ or by record of all sites and features of historical and archaeological interest.
- **AH 3** Protect the intrinsic value, character, integrity and settings of monuments and places in the Record of Monuments and Places (RMPs) and any forthcoming statutory register and protect Zones of Archaeological Potential against inappropriate development.

In addition the PDS is located within an area that has been zoned as 'Not Open for Consideration' for Wind Energy in the *Laois County Development Plan 2021–2027*:

- **WES 7:** Areas Not Open for Consideration. These areas are not considered suitable for wind farm development due to their overall sensitivity arising from landscape, ecological, recreational and/or cultural and built heritage resources as well as their limited wind regime.

### **Recommendation**

The EIAR, as submitted, is potentially deficient as the baseline archaeological and cultural heritage environment has not been adequately characterised. The potential impact to the setting and amenity of the National Monuments at Timahoe and Fossy must also be more fully addressed. Therefore, the assessment of the likely impacts and effects of this development to the archaeological resource cannot be evaluated reliably. The Department recommends that permission should not be granted in this case before the inadequacies



identified in the EIAR have been addressed and a revised EIAR document made available as further information.

In the event that a revised EIAR document is made available as further information, the Department may provide further observations.

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)

Yours faithfully,

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Julie Sullivan  
Assistant Principal  
Development Applications Unit  
Administration