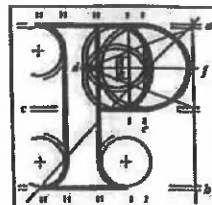


Our Case Number: ABP-316051-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Angela Clarke
Landowner Hill of Uisneach
Loughnavalley
Millungar
Co. Westmeath

Date: 27 April 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 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,

Kevin McGettigan
Administrative Assistant
Direct Line: 01-8737263

BL50A

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Re: Strategic Infrastructure Application.

Applicant: Ummamore Development Ltd. Project Number: 201050.

Submission in respect of:

Hill of Uisneach, UNESCO World Heritage, Tentative Listed site.

Dear Sir/Madam,

We refer to the Strategic Infrastructure Status which is sought by Ummamore Development Ltd. for the development of a wind farm in County Westmeath. We note that the applicants contend that this windfarm which will comprise 9 turbines, with a rotor diameter of 162 metres and an overall height of 185 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.

As the owners/guardians of the Hill of Uisneach, We wish to make a number of observations under the following headings :

- **The Hill of Uisneach and UNESCO World Heritage.**
- **Westmeath County Development Plan and The Hill of Uisneach**
- **Issues concerning the adjacent site of Knockastia and the visual and cultural connection to Uisneach:**
- **Important General issues concerning non compliance with the Westmeath County Development Plan and this Application:**
- **Summary**

The Hill of Uisneach and UNESCO World Heritage.

We feel it is essential to point out to an Bord that The Hill of Uisneach is one of a group of Irish Royal Sites which are deemed to be of outstanding universal value and accordingly are listed for inclusion under the UNESCO World Heritage Convention. They are stated in the application to be "universally unique through their well-preserved cultural continuity and large-scale Iron Age complexes. The Royal Sites were sacred sites and places of royal inauguration and bear exceptional testimony to Iron Age civilisation. Historically, their roots go back to the Neolithic period and they illustrate significant stages in human history through the large array of monuments ranging from Bronze Age tumuli to Iron Age ring forts and to early Christian architecture. All of the Royal Sites form part of larger archaeological landscapes

characterised by a large concentration of ritual monuments. Situated on strategic and elevated locations, the Royal Sites are organically evolved relict cultural landscapes where the pre-Christian kingship in Ireland evolved and ended."

As an internationally important archaeological and cultural site being part of an archaeological and cultural landscape which remains essentially pastoral and in fact it is important that the status of this site as a UNESCO tentative listed site is born in mind in making any decisions concerning this application to be afforded strategic structural status.

Westmeath County Development Plan and The Hill of Uisneach

The applicants describe Uisneach as "*a highly sensitive landscape*" (M.K.O., Non-Technical Summary, p.28). However, it is noted 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 Plann or *that they are deemed to be part of a wider cultural landscape in the context of the UNESCO application*. This panoramic aspect contributes greatly to the historical interpretation and cultural importance of Uisneach, within the landscape.

The applicants generate **one** rendered wireline view from the summit of the Hill in their visual assessment chapter. The direction of this wireline view from the summit is difficult to discern. The applicants fail to supply 360-degree panoramic images which capture the entire landscape around Uisneach. Instead, the applicants provide photomontages from the summits of Knockastia and Laragh Hill to demonstrate the visual effect of the wind farm on the Hill of Uisneach.

The applicants indicate that they were refused physical access to the site. The inability to physically access Uisneach appears to be used as a justification for the minimal visual and landscape assessment of the effect of the windfarm on Uisneach. However, the applicants could have availed of data from other Geographical Information Systems and LiDAR technology to both assess the topography of the landscape and generate the necessary vistas from the 360-degree panoramic view.

It is also noted that the applicants have failed to provide a reverse zone of theoretical visibility for this highly sensitive location, in line with the Wind Energy Guidelines recommendations.

Throughout the application, the applicants acknowledge that:

All turbines of the Proposed Development are likely to be visible from the top of the Hill of Uisneach where open views are permitted to the west (MKO., Chapter 13.8.2).

And

There will be full theoretical visibility from the top of Uisneach and the Catstone (MKO., Chapter 12.91).

However, the applicants then contend that the effect of the windfarm will be "slight/moderate" on Uisneach. The Wind Energy Guidelines 2006 state that '*factors that can inform landscape sensitivity to wind energy development, include scenic quality, rarity, uniqueness and natural and cultural heritage considerations.*' However, the applicants fail to supply the landscape sensitivity criteria upon which they are making this assessment.

The applicants suggest that a ridge/vegetation may have a mitigating effect/obscure the view. However, this would not be an acceptable mitigating measure for a site of this national indeed international significance.

Although the applicants confirm that Uisneach has been designated as an area of High Amenity Status in the County Development Plan, they fail to highlight the High Amenity Area Policy Objectives, namely 13.20 to 13.28 contained in the County Development Plan which include inter alia, the following High Amenity Area Policy Objectives:

High Amenity Areas Policy Objectives:

It is a policy objective of Westmeath County Council to:

CPO 13.20 Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.

CPO 13.21 Protect and preserve designated High Amenity Areas from inappropriate urban generated housing development or any other development which would be injurious to or detract from the natural amenity of Areas of High Amenity.

(Westmeath County Development Plan, 2021-2027, CPO 13.20 and 13.21)

Uisneach measures approximately 180 metres in height; The proposed turbines with an overall ground-to-blade tip height of 185 metres, blade rotor diameter of 162 metres and hub height of 104 metres will undoubtedly dominate the landscape within which Uisneach is situate.

Similarly, the applicants mention policy 13.7 of the Current County Development Plan which requires Westmeath County Council to:

Ensure that any significant, industrial and or infrastructural developments (excluding residential; agricultural buildings; tourism; greenway; cultural; educational or community buildings), which would impact upon Uisneach and or its protected views will not be permitted due to the sensitivity of the site.

Footnote: CPO constitutes a 'policy' of the Plan as envisaged under Section 1.1 of the plan

The applicants appear to contend that as the windfarm does not physically affect Uisneach, the proposed windfarm does not contravene this policy. The applicants appeared to have overlooked the final clause of this policy which states "*or its protected views*"

Issues concerning the adjacent site of Knockastia visual and cultural connection to Uisneach:

The applicants indicate that *"There is no visual connectivity between the Hill of Uisneach and any other sites of cultural heritage importance in the direction of the Wind Farm Site, the proposed turbines do not intrude upon or obstruct intervisibility between any heritage sites."*

However, the applicants then concede that the windfarm will have an effect on Knockastia, which is situated to the west of Uisneach. This contradicts the applicants' first assertion that the windfarm will not intrude upon the intervisibility between Uisneach and other sites of cultural importance.

The view from Knockastia is a protected view under the County Development Plan. There is a direct cultural correlation between the Hill of Uisneach and Knockastia. 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 summits all over the country. This suggests that the visibility of the summit and its commanding views in the landscape certainly played a crucial role in this practice and belief.

"It is probable that similar Bealtine fires were lit on Croghan Hill, in Co. Offaly, on Knockastia and on many other hilltop sites in the surrounding counties" (Sheehan, 1996).

The applicants fail to mention that the excavated cemetery at Coolatoor on the summit of Knockastia has been found to contain upwards of 40 Early/Middle Bronze Age burials, which is more than the high-status cemetery at Grange near to the Royal site of Rathcroghan and more even than the Bronze Age cemetery phase of the Mound of Hostages at Tara (McGuinness, 2014). Knockastia is located approximately 5km southwest of Uisneach and is of a similar height to Uisneach.

The applicants acknowledge that the windfarm will have visual effects, which are deemed to be 'Moderate' from the peak of Knockastia. However, similar to their previous assessment of the landscape sensitivity at Uisneach, the applicants fail to supply the landscape sensitivity criteria upon which they are making this assessment.

It is noted that although the applicants contend that they have supplied visual and landscape assessments of the effect of the windfarm on these locations, the applicants have supplied limited visual assessments only rather than detailed visual and landscape assessments as required by Policy Objective 13.12 of the County Development Plan.

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.'

The proposed turbines will have an overall ground-to-blade tip height of 185 metres, blade rotor diameter of 162 metres and hub height of 104 metres.

Both The Hill of Uisneach and Knockastia, which measure approximately 180 metres in height will be dwarfed by the scale and height of the proposed windfarm turbines. The landscape significance of their cultural intervisibility in the landscape will be irretrievably damaged.

Important General issues concerning non compliance with the Westmeath County Development Plan and this Application:

We note that the applicants recite the commitment to supporting renewables in both national and local policies. In addition, the application recites *'the importance of the current Westmeath County Development Plan 2021-2027 (WCDP) which came into effect on the 3rd May 2021 is relevant'* (page 5 of the application).

However, rather remarkably, the application fails to address Policy Objective 10.146 in the County Development Plan as follows:

*"To **strictly direct** large-scale energy production projects, in the form of wind farms, onto cutover cutaway peatlands in the County, subject to environmental, landscape, habitats and wildlife protection requirements being addressed. In the context of this policy, industrial scale/large-scale energy production projects are defined as follows:*

Projects that meet or exceed any of the following criteria:

- *Height: over 100m to blade tip, or*
- *Scale: More than five turbines, or*
- *Output: Having a total output of greater than 5MW. Developments sited on peatlands have the potential to increase overall carbon losses.*

Proposals for such development should demonstrate that the following has been considered:

- *Peatland stability; and*
- *Carbon emissions balance.*

On this basis the current S.I.D application is in direct contravention with the Current Westmeath County Development Plan 2021-2027.

Campbell v The Minister for Housing, Planning, Community and Local Government v Donegal County Council (2017) affirms the legal importance of the prescriptive requirements within a County Development Plan notwithstanding national policy.

Summary:

The applicants allege that they are satisfying a commitment to renewables contained in the County Development Plan. However, notwithstanding this commitment they are obliged to adhere to the proper planning processes to support a development of this scale.

We would submit with respect that there are substantial inadequacies/omissions in the documentation which the applicants have lodged in support of their S.I.D application. In addition, they have failed to address other key policies contained within the Westmeath County Development Plan. In particular, their application has failed to address the key protections afforded to Uisneach within the County Development Plan or those aspects of the application for UNESCO a world heritage which are of national and international importance.

On this basis, We would request that this windfarm development is not afforded Strategic Infrastructure Status.

Yours faithfully,

Angela Clarke

Landowner Hill of Uisneach

Loughnavalley

Mullingar

Co Westmeath N91 WNW2

Beneath the shadow of Uisneach, Sheehan, J. (1996). Westmeath Examiner Ltd.

The Prehistoric Burial Mounds and related monuments in County Westmeath, (2014). McGuinness, D. Westmeath County Council.