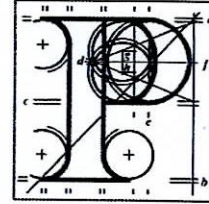


Our Case Number: ABP-316051-23



**An
Bord
Pleanála**

Office of Public Works
Unit 20
Lakeside Retail Park
Claremorris
Co. Mayo
F12DK30

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.

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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Niamh Thornton

From: Deirdre Hardcastle <Deirdre.Hardcastle@opw.ie>
Sent: Thursday 4 May 2023 15:23
To: Niamh Thornton
Cc: Bord; SIDS
Subject: Bord Pleanála Case reference: PA25M.316051_Prescribed Body
Attachments: Prescribed-Bodies- OPW.pdf; 20230504 OPW observations_planning appl_Umma More Windfarm.pdf

A chara,

Re: Bord Pleanála Case reference: PA25M.31605,

Please see attached the submission from the OPW. Also see attached the letter outlining our prescribed status, hence no fee is applicable.

Is mise le meas,
Deirdre

Deirdre Hardcastle
Heritage Services - National Monuments

Oifig na nOibreacha Poiblí
Office of Public Works

Aonad 20, Páirc Mhiondíola Cois Locha, Clár Chlainne Mhuiris, Co Mhaigh Eo, F12 DK30
Unit 20, Lakeside Retail Park, Claremorris, Co Mayo, F12 DK30

T +353 46 942 2527
<https://gov.ie/opw>

To send me files larger than 30MB, please use the link below
<https://filetransfer.opw.ie/filedrop/Deirdre.Hardcastle@opw.ie>

Email Disclaimer: <https://www.gov.ie/en/organisation-information/439daf-email-disclaimer/>



Office of Public Works
Jonathan Swift Street,
Trim,
Co Meath
C15 NX36

Our Ref: 201050
Your Ref:

10th of March 2023

Re: Section 37E of the Planning and Development Act 2000, as amended - Planning Application to An Bord Pleanála for a Proposed Development in the townlands of Ballynafearagh, Raheen, Baskin High, Baskin Low, Lissanode, Umma Beg or Moneynamanagh, Umma More in County Westmeath

Dear Sir/Madam,

On behalf of our client, Umma More Ltd. please find enclosed a copy of a planning application for a renewable energy development in County Westmeath. The planning application constitutes Strategic Infrastructure Development (SID) and the application has therefore been made directly to An Bord Pleanála. You have received a copy of the application as a noted Prescribed Body. The Proposed Development consists of:

- 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.

A ten-year planning permission is sought.



An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in relation to the project and accompany this planning application.

As the project requires an Environmental Impact Assessment Report (EIAR) the application has been notified to the EIA Portal. The EIA Portal ID is 2023029 and that the project details have been uploaded to the EIA Portal.

The following documents are included in the application pack:

- Planning Application Documentation
 - Planning Application Form
 - Site Notice
 - Newspaper Notices - The Irish Examiner, The Athlone Advertiser
 - EIA Portal Confirmation (ID: 2023029)
- Planning Application Drawings (Drawing Schedule included with Application Form)
- Environmental Impact Assessment Report (EIAR)
 - Volume 1 – Non-Technical Summary (NTS) and Main Report
 - Volume 2 – Photomontage Booklet
 - Volume 3 – EIAR Appendices
- Natura Impact Statement (NIS)

An electronic copy of the planning application pack as outlined above is enclosed with this letter. An Bord Pleanála and Westmeath County Council have received a copy of the application pack. The application will be available for inspection at the offices of An Bord Pleanála and Westmeath County Council for a period of seven weeks commencing on the 16th March 2023.

All documentation associated with the application as lodged can also be found at the dedicated project website: www.ummamoreplanning.com

Submissions or observations **may be made only to An Bord Pleanála** (“the Board”) in writing or online at www.pleanala.ie, 64 Marlborough Street, Dublin 1 during the above-mentioned period of seven weeks relating to:

- i. The implications of the proposed development for proper planning and sustainable development, and
- ii. The likely effects on the environment of the proposed development, and
- iii. The likely effects of the proposed development on a European site, if carried out.

Any submissions/observations must be accompanied by a fee of €50 (except for certain prescribed bodies) and must be received by the Board not later than 5.30 p.m. on the 4th of May 2023. Such submissions/observations must also include the following information:

- The name of the person making the submission or observation, the name of the person acting on his or her behalf, if any, and the address to which any correspondence relating to the application should be sent,
- The subject matter of the submission or observation, and
- The reasons, consideration and arguments on which the submission or observation is based in full (Article 217 of the Planning and Development Regulations 2001, as amended, refers)

Any submissions or observations which do not comply with the above requirements cannot be considered by the Board.



The Board may at its absolute discretion hold an oral hearing on the application (refer to 'A Guide to Public Participation in Strategic Infrastructure Development' at www.pleanala.ie). The Board may in respect of an application for permission decide to:

- (a) (i) grant the permission, or
(ii) make such modifications to the proposed development as it specifies in its decision and grant permission in respect of the proposed development as so modified, or
(iii) grant permission in respect of part of the proposed development (with or without specified modifications of the foregoing kind), and any of the above decisions may be subject to or without conditions, or
- (b) Refuse to grant the permission

Any enquiries relating to the application process should be directed to the Strategic Infrastructure Development Section of An Bord Pleanála (Tel. 01-8588100).

A person may question the validity of any such decision of the Board by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts (S.I. No. 15 of 1986, as amended by S.I. No. 691 of 2011), in accordance with Section 50 of the Planning and Development Act, 2000 as amended. Practical Information on the review mechanism can be accessed on the Boards website (www.pleanala.ie) under the following heading: Legal Notices – Judicial Review Notice. This information is also available on the Citizens Information Service website www.citizensinformation.ie

Yours sincerely,



Meabhann Crowe, MRTPI

Project Planner MKO

ENCL -





An Bord Pleanála
64 Marlborough Street
Dublin 1

4th May 2023

Re: Planning Application by Umma More Ltd for 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,

The Office of Public Works (OPW) wishes to make the following observations on the above referenced planning application. In addition, OPW acknowledges and supports a submission by the Department of Housing, Local Government and Heritage (DHLGH) in relation to the Hill of Uisneach.

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 AT THE HILL OF UISNEACH

The Hill of Uisneach contains National Monument (No. 155). 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). National Monument (No. 155) consists of two monuments: the 'Cat Stone' and its surrounding embanked enclosure (a ring barrow) RMP WM024-061, and a nearby ringfort RMP WM024-069. The Hill of Uisneach is part a serial entry on the World Heritage Tentative List. The OPW has concerns that the development, as proposed, may have a negative impact on the setting of, significance of, and the views from, and to, the National Monument. In particular, the OPW is concerned about the impact on the O.U.V. (Outstanding Universal Value) of the site.

3.0 SIGNIFICANCE OF THE HILL OF UISNEACH

The Hill of Uisneach, at 180m above sea-level, affords extensive panoramic views across the central plain of Ireland. It is an exceptionally rich cultural landscape, with small lakes and springs, stone outcrops and glacial erratics and more than 35 archaeological monuments and sites, including National Monument No. 155. The Hill of Uisneach is renowned in early Irish tradition as the umbilical centre of Ireland and meeting point of the ancient provinces, and it was the royal seat of one of Ireland's most powerful medieval dynasties, the Uí Néill.

As one of the 'Royal Sites of Ireland' (with Navan Fort, Dún Ailinne, the Rock of Cashel, Rathcroghan and Tara), the Hill of Uisneach 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:

'The Royal Sites were sacred sites and places of royal inauguration and bear exceptional testimony to Iron Age civilisation forming a globally unique group of archaeological ceremonial complexes. 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.'

Issues of concern include the impact on the setting, association and meaning of the Hill of Uisneach. 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).

4.0 PROTECTION UNDER THE WESTMEATH COUNTY DEVELOPMENT PLAN 2021-27

The windfarm application quotes multiple references in Westmeath County Development Plan (WCDP), the objective of which is to protect the Hill of Uisneach and its panoramic views:

- The application quotes the WCDP as saying that the Hill of Uisneach “confers both panoramic views, as well as visual prominence, which ensures that the site and its immediate context is very sensitive to adverse visual impacts.’
- The protected panoramic view (W-V36), from the Hill of Uisneach is has national importance designation. The WCDP describes it as follows: ‘Panoramic view of surrounding countryside from atop the Hill of Uisneach. View from point on site trail, by St Patrick’s Bed. A panoramic view from the top of the Hill of Uisneach. The hill’s rugged terrain makes up much of the view foreground. Beyond, the view is the surrounding working landscapes. Views facing North provide the greatest extent of visible landscape.’
- CPO 13.7 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.”
- CPO 13.17 ‘Protect and enhance the setting of the Hill of Uisneach...’
- CPO 13.19: 1. ‘Protect and sustain the established appearance and character of views associated with the High Amenity Area around the Hill of Uisneach....’
- CPO 13.80 ‘Protect and sustain the established appearance and character of views listed in Appendix 5 of this plan that contribute to the distinctive quality of the landscape from inappropriate development.”
- CPO 14.6 Seek to ensure the protection of archaeological sites and monuments and their settings;
- O-AH6: It is an objective ‘to designate Fore, Kilbixy, Ardnurcher and the Hill of Uisneach as Archaeological Landscape Areas, in recognition of their numerous archaeological monuments and national heritage significance’.
- LCA 09 describes the Hill of Uisneach as having Very High sensitivity to windfarm development.
- 13.15 Character Area 9 Hill of Uisneach: ‘The Hill of Uisneach, a nationally significant archaeological landscape..... has a central place, historically, geographically and metaphorically in the annals of Ireland and is internationally considered to be an important cultural landscape.’

In addition, WCDP Section 13.25 Views and Prospects states that ‘it is Council policy to sustain the established character of existing views and protect against development that would adversely impact upon such views. Given the archaeological significance of the Hill of Uisneach, a panoramic view has been designated at this site.’

5.0 VISUAL IMPACT OF PLANNING APPLICATION

The Westmeath County Development Plan recognises that the Hill of Uisneach is of national archaeological importance and international cultural landscape importance. WCDF 13.15 Character Area 9 Hill of Uisneach describes this cultural landscape as being ‘very sensitive to adverse visual

impacts'. Views from the hilltop commanding the surrounding cultural landscape are fundamentally intrinsic to its significance and its O.U.V, and the site acts as a visual focus within the landscape.

The planning application Table 12-6 LCA Preliminary Assessment assesses the Theoretical Visibility as follows: 'One area of full TV upon the northern, western and southern slope of the Hill of Uisneach. An area of full TV in the south west of the LCA. The rest of the LCA shows no TV' and 'it is likely that actual visibility is less than indicated by the ZTV, although there is likely to be visibility of the proposed turbines from the highest elevations and westerly aspect of the Hill.' While acknowledging the access difficulties encountered by the planning applicant's team, the assessment of impact on the significance of the Hill of Uisneach is inadequate, considering the degree of protection afforded by WCDP and the Hill's World Heritage Tentative List status.

Based on the rendered wireframe visualisations, the 9 no. 185m high turbines starting at a distance of 8.8km, will feature prominently as very large manmade objects, albeit partially obscured, in the views to the west of the Hill of Uisneach. Being manmade objects, white and rotating, they will draw the eye and become the focus of that view.

The planning application makes reference to the core and buffer amenity areas associated with the WH tentative list nomination referencing the WCDP. However, the proposed application does not refer to 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.

6.0 CUMULATIVE IMPACT

The planning application refers to three other proposed windfarms in the vicinity of the proposed Umma More. Planning Application Drawing *Figure 12-18* demonstrates the theoretical visibility of all four windfarms from the Hill of Uisneach, i.e., a total of 50 turbines, of which 9 (Umma More) are 8.8km min. away from the Hill of Uisneach, 15no. (Lemanaghan) are located approx. 20km to the southwest, 25no. (Derryadd) are proposed approx. 20km to the northwest of the Hill of Uisneach and 1 located approx. 15km away, to the southeast. The scale of turbines is such that even at 20 - 25km distance they remain visible, albeit diminished in scale.

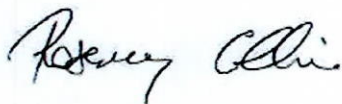
7.0 CONCLUSION

The OPW is very concerned about the impact on protected panorama views from the Hill of Uisneach and from National Monument (No. 155) in this important cultural landscape. The OPW is particularly concerned about the impact on the proposed O.U.V. of the World Heritage Site Tentative List property. In addition, OPW notes with concern the cumulative effect of 50 turbines proposed in the cultural landscape hinterland of Hill of Uisneach. The OPW considers the significance assessment and impact assessment to be inadequate. The OPW requests that Westmeath County Council and 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.

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,

A handwritten signature in black ink, appearing to read 'Rosemary Collier', written in a cursive style.

Rosemary Collier

Head of Heritage Services and Capital Works Delivery