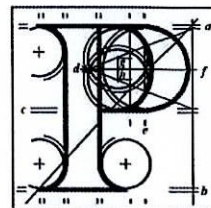


Our Case Number: ABP-316051-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Roseanne Schot, BA PhD
Island in the Sky
Castletown
Portroe
Nenagh
Co. Tipperary
E45 T280

Date: 05 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 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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

BL50A

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
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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

Roseanne Schot, BA PhD
Island in the Sky,
Castletown, Portroe,
Nenagh, Co. Tipperary
E45 T280

An Bord Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902

1st May 2023

Re: Proposed Wind Farm Development at Umma More and adjacent townlands, Co. Westmeath

Dear Sir/Madam,

As an archaeologist specialising in the study of Uisneach and its wider landscape since 2001, I am particularly concerned to learn of proposed plans to develop a wind farm nearby, at Umma More and adjacent townlands, near Ballymore.

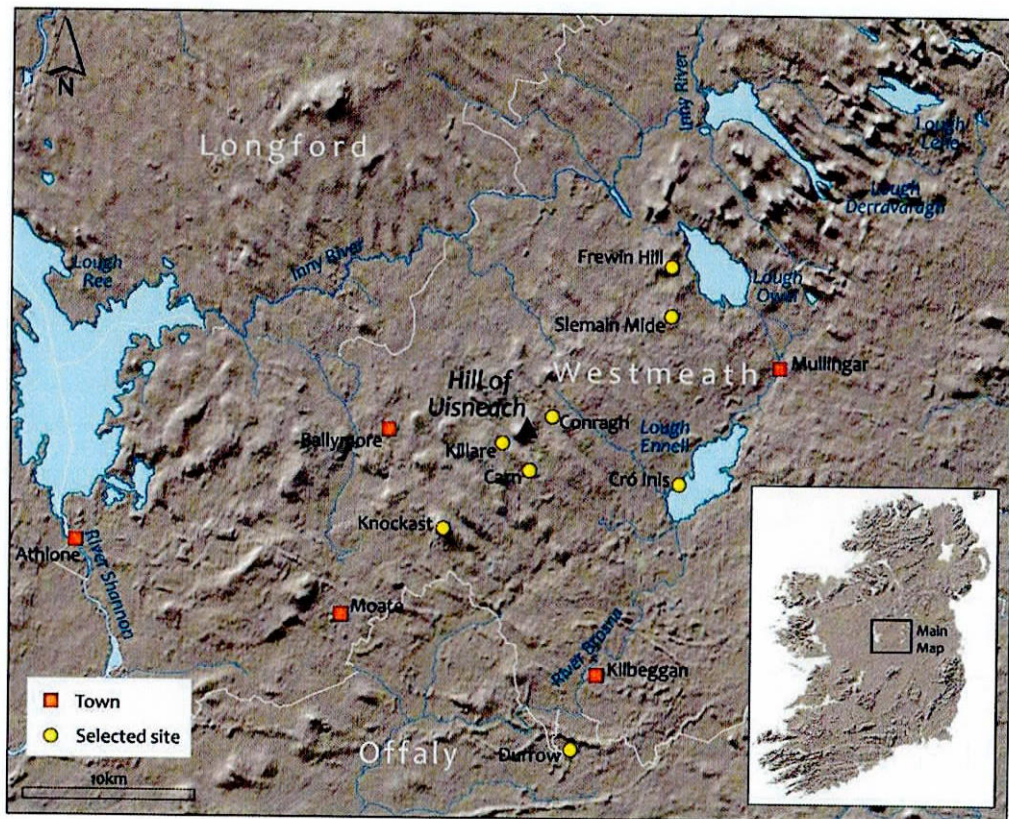
The celebrated 'Navel of Ireland' and meeting point of the ancient provinces, the Hill of Uisneach is an ancient ceremonial centre and place of kingship, and one of six 'Royal Sites' nominated to Ireland's Tentative List for UNESCO World Heritage (WHS) status.¹ The Hill is the location of a major assemblage of archaeological monuments and sites dating from the Neolithic period (c.4000—2500BC) to medieval times. It forms the centrepiece of an extensive, integrated cultural landscape distinguished by a wealth of archaeological remains and associated mythology, history, toponomy and folklore (a list of research publications is provided below).

At 181m above sea-level (ASL), Uisneach is one of the highest hills in the region and is also one of the broadest, encompassing an area of some 4km². It forms part of a belt of scattered limestone uplands that includes the prominent peaks of Knockast (200m ASL), several kilometres to the southwest, and Frewin Hill (171m ASL), near the western shore of Lough Owel.

The unrivalled prospect from the Hill of Uisneach, taking in much of the central lowlands of Ireland, has been celebrated in Irish literature since the ninth century and remains one of the site's major attractions today. The physical elevation and views from the Hill were undoubtedly important to the development and past understanding of Uisneach as a sacred place and its designation as the 'centre' of Ireland. The panoramic vista encompasses many other historically significant places and monuments in the surrounding landscape and there is also good visibility between individual monuments on the Hill, which further enhances the sense of connection between the various elements of the site and their wider setting. The rural, pastoral character of the landscape have helped to preserve and enhance the aesthetic qualities of its natural and cultural heritage. The Hill retains an aura of sanctity and is still regarded as a sacred place today, with strong spiritual associations for many different communities.

¹ Alongside Cashel (Co. Tipperary), Dún Ailinne (Co. Kildare), Navan Fort (Co. Armagh), Rathcroghan (Co. Roscommon) and Tara (Co. Meath).

Located less than 9km southwest of the Hill of Uisneach, the proposed wind farm – comprising 9 No. wind turbines with a blade-tip height of 185 metres – would be visually dominant and intrusive and entail a significant change to the landscape character of the region. The visibility of the turbines from Uisneach is acknowledged in the Environmental Impact Assessment Report prepared by MKO and associates (2022; in particular, Chapters 12 & 13) and, indeed, can be considered to exceed the designation of ‘Moderate’, given the height of the turbines relative to the Hill of Uisneach and other local topographical features. This includes other hills with extensive views crowned by major archaeological monuments, such as Knockast (or Knockastia), the site of one of Ireland’s largest Early Bronze Age cemeteries (Hencken & Movius 1934), which is located just c.4km southeast of the proposed wind farm.



Map of Uisneach and selected sites in the surrounding landscape.

Importantly, the proposed wind farm development conflicts with the overarching ethos of the Westmeath County Development Plan 2021-2027 with regard to the protection of views and the landscape setting of the Hill of Uisneach. Specifically, the Plan states:

In recognition of the exceptional archaeological and cultural significance of the Hill of Uisneach, the site has been designated as a High Amenity Area. The elevation of 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 Council recognise the significance and sensitivity of the Hill of Uisneach and given that the site is listed on the tentative list for UNESCO status since 2010, further protection has been afforded to the site by designating the area as a High Amenity Area with views from the

perimeter skyline ridge identified as a Protected Panoramic View (Westmeath CDP, vol. 1, p. 417).

Moreover, the Plan sets out a range of relevant policy objectives, including those that seek to:

- Protect and conserve the natural, built and cultural heritage features which add value to the visitor experience in Westmeath and seek to restrict developments which would damage or detract from the quality of scenic areas and identified natural and cultural heritage assets (CPO 6.7)
- 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 13.7)
- Ensure the protection and sympathetic enhancement of archaeological heritage [...] (CPO 14.5)
- Ensure the protection of archaeological sites and monuments and their settings and archaeological objects that are listed in the Record of Monuments and Places [...] and those] identified subsequent to the publication of the Record of Monuments and Places (CPO 14.6)

These objectives are also reflected in the recently completed, draft Hill of Uisneach Conservation Management Plan (2021), the preparation of which was a key recommendation of the Westmeath County Development Plan and the Uisneach Advisory Group. Comprising landowner, community and academic stakeholders together with representatives of government and public agencies, the Uisneach Advisory Group was established in 2014 to provide a platform for consultation and discussion on the protection, management and sustainable development of the Hill of Uisneach as a national and potential UNESCO World Heritage site.

The adverse impact of the proposed wind farm on the visual amenity, setting and integrity of the cultural landscape of Uisneach, risks undermining the Outstanding Universal Value (OUV) that underpins its nomination for UNESCO World Heritage Site status.

While acknowledging the need to increase renewable energy production to meet our Climate Change goals, I would contend that it is neither appropriate nor sustainable to do so at the expense of our most significant cultural and natural landscapes.

Yours sincerely,



Dr Roseanne Schot
Archaeologist

Select publications

- Hencken, H. O'N. & Movius, H.L. 1934. The cemetery cairn of Knockast. *Proceedings of the Royal Irish Academy* 41C, 232–84.
- Macalister, R.A.S. & Praeger, R.L. 1928. Report on the excavation of Uisneach. *Proceedings of the Royal Irish Academy* 38C, 69–127.
- Macalister, R.A.S. & Praeger, R.L. 1931. The excavation of an ancient structure in the townland of Togherstown, Co. Westmeath. *Proceedings of the Royal Irish Academy* 39C, 54–83.
- McGinley, S., Potito, A.P., Molloy, K., Schot, R., Stuijts, I. & Beilman, D.W. 2015. Lough Lugh, Uisneach: from natural lake to archaeological monument? *Journal of Irish Archaeology* 24, 115–30.
- Schot, R. 2006. *Uisneach Midi a medón Érenn*: a prehistoric cult centre and 'royal site' in Co. Westmeath. *Journal of Irish Archaeology* 15, 39–71.
- Schot, R. 2008. Uisneach, Co. Westmeath: archaeology, history and legend (prehistory – c.AD1100). 2 vols. Unpublished PhD thesis, National University of Ireland, Galway.
- Schot, R. 2011. From cult centre to royal centre: monuments, myths and other revelations at Uisneach. In R. Schot, C. Newman & E. Bhreathnach (eds), *Landscapes of cult and kingship*, 87–113. Dublin: Four Courts Press.
- Schot, R., Stuijts, I., McGinley, S. & Potito, A. 2014. Reflections on a lake: a multi-proxy study of environmental change and human impacts at Lough Lugh, Uisneach, Co. Westmeath. *Discovery Programme Reports* 8, 113–26. Dublin.
- Schot, R. (with contributors) 2016. Conservation Plan for the Hill of Uisneach, Co. Westmeath. Phase 1: Assessment of Cultural Significance. Unpublished Consultation Draft.