

An Coimisiún Pleanála,

64 Marlborough St,

Dublin 1,

D01 V902.

21 May 2026

Re: Observation on the Lemanaghan Wind Farm. Case Reference: 324161

Dear Sir/Madam,

Please find below my observation relating to the proposed Lemanaghan Wind Farm. I am a professional historian with expertise in Irish history, and I also have extensive first-hand experience of the landscape of the Irish midlands. I have already written several more detailed observations in relation to the Hill of Uisneach and the proposed Umma More Wind Farm (Case No. 321595). In the context of the planned UNESCO nomination for the Royal Sites of Ireland, some of the significant issues that arise in relation to the Umma More are also of relevance to the Lemanaghan project.

I am concerned regarding the assessment of the view of the proposed Lemanaghan turbines from the tentative UNESCO site at Uisneach. Viewed from Uisneach, the Lemanaghan wind farm will appear in very close proximity to and overlapping with Knockastia (a Bronze Age burial site), which is generally accepted to represent one of the key intervisibility relationships between Uisneach and its cultural landscape. The view would not be obstructed, but there would certainly be intrusion, in a shared field of view, with little sense of visual separation. Knockastia is 202m elevation above sea level. Viewed from Uisneach, the turbines at tip height c. 270m elevation above sea level will appear taller than Knockastia. When compared to Knockastia, which is one of the most notable and distinctive landmarks visible from Uisneach, the turbines will occupy a roughly equal horizontal extent to that substantial hill, notably detracting from its dominance in that view. The Lemanaghan turbines will also be noticeably closer and taller than the existing turbines in this direction of view from Uisneach. Accordingly, MKO's claim that the turbines would appear as 'very small features' (EIAR, Appendix 14-3, p. 37) does not appear to be correct.

MKO has not employed any expert qualified to carry out a proper and rigorous assessment of how the Lemanaghan project would impact on the Outstanding Universal Value (OUV) of Uisneach. There is no evidence that it has engaged sufficiently, and in relation to Uisneach specifically, with relevant parties such as Westmeath County Council, the Westmeath County Heritage Officer, the Royal Sites of Ireland Steering Group, or the OPW. It is unclear if Uisneach was addressed in consultations with the National Monuments Service.

The Photomontage presented for Uisneach (VP20) does not contain information relating to the time of day and date that the imagery was captured. This is inconsistent with the approach taken for other vantage points, and has implications for interpreting the relevant imagery. The drone imagery is also of insufficient quality to allow a proper impression to be formed of exactly how the wind farm would interact with Knockastia Hill.

It is also necessary that MKO produce a photomontage captured from the Cat Stone national monument. Due to the intervening landform around Uisneach, the upper part of Knockastia is one of the few mid-distance landmarks visible from the Cat Stone, which is a site and monument of extremely high importance. Turbines appearing level with and higher than Knockastia when viewed from the Cat Stone could be considered problematic in the context of UNESCO OUV. This aspect surely requires further assessment by properly qualified experts.

In EIAR, Appendix 14-3, pp. 37-38, MKO states the following with regard to VP 20 – Hill of Uisneach:

The proposed turbines are located 16km beyond Knockastia Hill, in the distant background, as seen in the rendered wireline view and therefore there is substantial separation in the landscape, and they do not directly disrupt any visual connectivity between the Hill of Uisneach and Knockastia.

This substantial separation, e.g. the 16km between Knockastia and Lemanaghan, will not be readily perceptible from Uisneach, particularly with regard to those turbines which would appear directly overlapping with the lower slopes of Knockastia.

The substantial set back distance in combination with intervening features of the landscape such as the rolling landform, varied field patterns and the abundance of mature vegetation provide a physical landscape buffer between the proposed turbines

and the Hill of Uisneach landscape and the setting of the important cultural heritage monuments at this location.

This ‘mitigating factor’ is copied word for word from the Umma More Wind Farm EIAR (321595, Appendix 12-3, p. 31). It should be noted that when viewed from the Cat Stone in particular, the ‘physical landscape buffer’ is significantly foreshortened due to the intervening ridge situated around 1.8-2km south west from Uisneach, which creates a horizon line. As such, the turbines may appear visible along that nearby ridge alongside the direct view of the top of Knockastia Hill.

The proposed turbines do not obstruct intervisibility between any heritage sites and the Hill of Uisneach and do not compromise the integrity of any visual links between the Hill and the wider cultural landscape.

The proposed turbines will not fundamentally detract from the visitor experience of the Hill, its landscape and monuments, or any visual connectivity with other landmarks or places of significance elsewhere in the wider landscape.

These claims are very much open to question with regard to Knockastia in particular and require a proper assessment by a UNESCO Heritage Impact Assessment (HIA) expert.

As demonstrated by ZTV mapping, indicative online imagery and investigation of aerial satellite imagery, the proposed turbines are only likely to be visible from elevated areas on the south-western aspect of the Hill of Uisneach.

There are large areas within the Hill of Uisneach site, including areas where culturally significant monuments are located where there are no potential for views of the proposed turbines.

Again, these ‘mitigating factors’ are also copied directly from the Umma More EIAR. These claims are contradicted by the ZTV mapping in the Lemanaghan EIAR, Chapter 14 at p. 38, which in fact shows theoretical visibility of 11-15 turbines from substantial areas of the Uisneach hilltop, and its south and west sides, and most certainly not just the ‘south-western aspect’.

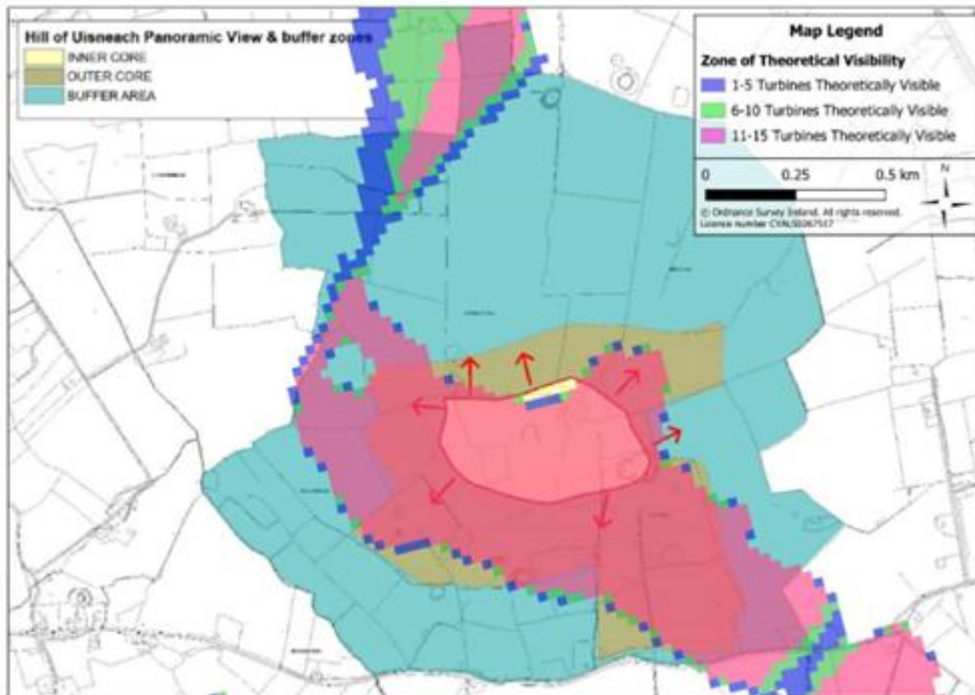


Figure 14-10 WCDP Figure 13.2 'Hill of Uisneach Panoramic View and Buffer Zone' overlain with a ZTV

Map from Lemanaghan EIAR, Chapter 14, p. 38, showing visibility from most of the Hill of Uisneach.

This Lemanaghan ZTV indicates visibility from the key hilltop area where most of the culturally significant monuments are located. The assertion that there are 'large areas' containing 'culturally significant monuments' from where the Lemanaghan wind farm would not be visible is therefore not credible. It is clear that the Viewpoint Assessment presented for Uisneach and Lemanaghan has involved taking some shortcuts. It is simply not good enough to borrow inaccurate 'mitigating factors' from another project. This practice reinforces the need for an appropriate expert to be employed.

Moreover, for a tentative UNESCO site, it would be more appropriate to use a blade-tip ZTV, rather than a half-blade ZTV. This has been done, for example, for the current live application relating to Rathcroghan Royal Site and the proposed Carrigeen Wind Farm (Case No. 32417). While the 2006 Wind Energy Guidelines recommend half-blade ZTV, it is important to note that turbine blades have more than doubled length since 2006. This ought to render the half-blade approach altogether obsolete.

The Lemanaghan EIAR also unfortunately gives yet another outing to the MKO/Tobar super-stretchy methodology for assessing indirect visual impacts on sites and monuments.

The problem that exists here can be illustrated by comparing across projects Tobar's use of a table entitled 'Grading of Potential visual effects according to Distance and No. of Turbines from Cultural Heritage Assets'.

This table is reproduced from Umma More Wind Farm, EIAR, Chapter 13, p. 15

Table 13-2: Grading of Potential visual effects according to Distance and No. of Turbines visible from Cultural Heritage Assets

No of Turbines Visible (ZTV)	1-2 (1)	3-4 (2)	5-6 (3)	7-9 (4)
Distance of asset to turbine				
4-5km (1)	1	2	3	4
3-4km (2)	2	4	6	8
2-3km (3)	3	6	9	12
1-2km (4)	4	8	12	16
0-1km (5)	5	10	15	20
Imperceptible (0)	Not Significant (1-5)	Slight (6-10)	Moderate (11-15)	Significant (16-20+)

This comparable table is reproduced from Clonberne Wind Farm, EIAR, Chapter 13, p. 14

Table 13-2: Grading of Potential visual effects according to Distance and No. of Turbines visible from Cultural Heritage Assets

No. of Turbines Visible (ZTV)	1-2 (1)	3-4 (2)	5-8 (3)	9-11 (4)
Distance of asset to turbine				
4-5km (1)	1	2	3	4
3-4km (2)	2	4	6	8
2-3km (3)	3	6	9	12
1-2km (4)	4	8	12	16
0-1km (5)	5	10	15	20
Imperceptible (0)	Not Significant (1-5)	Slight (6-10)	Moderate (11-15)	Significant (16-20+)

To take just a few data points: at Umma More, a scenario where 7 turbines would be within 1-2km of a 'cultural heritage asset' is rated as scoring 16 points on the scale, something that would have a 'significant' effect. However, at Clonberne, 7 turbines within 1-2 km of a cultural heritage asset is rated only as scoring 12 points, equalling a moderate effect. In fact, in the Clonberne calculations, you can have 8 turbines within 0-1km of a cultural heritage asset and still achieve the 'moderate' scoring of 15 points. More turbines; closer to the cultural asset; but somehow less effects? The discrepancy is even larger in the Knockshanvo EIAR, Chapter 13, p. 15. In the version of the table used in that EIAR, reproduced below, 9 turbines within 0-1km of an asset still only reaches 15 points, and a 'moderate' rating.

Table 13-2 Grading of Potential visual effects according to Distance and No. of Turbines visible from Cultural Heritage Assets

No. of Turbines Visible (ZTV)	1-3 (1)	4-6 (2)	7-9 (3)	
Distance of asset to turbine				
4-5km (1)	1	2	3	
3-4km (2)	2	4	6	
2-3km (3)	3	6	9	
1-2km (4)	4	8	12	
0-1km (5)	5	10	15	
Imperceptible (0)	Not Significant (1-5)	Slight (6-10)	Moderate (11-15)	Significant (16-20+)

Below is the relevant table from the Lemanaghan EIAR, Chapter 13, p. 23.

Table 13-4: Grading of Potential visual effects according to Distance and No. of proposed turbines visible from Cultural Heritage Assets

No. of Turbines Visible (ZTV)	1-5 (1)	6-10 (2)	11-15 (3)
Distance of asset to turbine			
4-5km (1)	1	2	3
3-4km (2)	2	4	6
2-3km (3)	3	6	9
1-2km (4)	4	8	12
0-1km (5)	5	10	15
Imperceptible (0)	Not Significant (1-5)	Slight (6-10)	Moderate (11-15)

The threshold for what counts as a ‘significant’ effect has been shifted again. At Umma More, 7 turbines within 1-2km of a cultural heritage asset was considered ‘significant’. For Clonberne, it required 9 turbines within 1-2km to reach a ‘significant’ effect. For Knockshanvo and Lemanaghan, MKO/Tobar have simply excluded the possibility of ‘significant’ effects altogether by omitting that category from the relevant table. At Lemanaghan, even 15 turbines within 1-2km of a cultural heritage asset is still deemed only to have a ‘moderate effect’. It is also worth noting that the proposed Lemanaghan turbines would be at least 35m taller than those proposed in the other projects just mentioned.

What exactly is the point of carrying out such a cultural heritage/visual effects assessment if the experts involved can keep moving the goalposts in this way to ensure that the ‘significant’ threshold is never crossed? This is shameless nonsense! The Commission should request a more rigorous and credible assessment that takes proper account of the sensitivities of the Lemanaghan landscape and the remarkable density of sites and monuments located there.

I trust that my observations will be given due regard.

Yours faithfully,

Dr John Cunningham.

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