



Oifig na
nOibreacha Poiblí
Office of Public Works



Case Reference ACP PAX20.324167

Administrative Officer

Strategic Infrastructure Development Section,

An Coimisún Pleanála,

64-67 Marlborough Street,

Dublin 1

D01 V90

25th May 2026

ACP- PAX20.324167: Proposed Wind Farm Development in the townlands of Leggatinty, Carrigeenacreeha, Ballynahowna, Caranlea, Killummod, Culleenatreen or Flagford, Cartroncaran, Lodge, Carrigeen, Ballaghcullia, Ballindrehid, Corbally East, Peak, Gortnacloy, Tonaknick, Ballysundrivan, Caran, Cloonkerin, Carrowntogher, Corbally Middle, Ballyroddy, Cloonshanville, Skeanavart, Dacklin, Kinclare, Erriblagh, Lisgarve, Loughbally, Rathardeagher, Carrigeenynaghtan, Brackloon, Edenan and Kinclare, Kilnamryall, Corbally West, Cartronicarrarowntogher, Carrowncaran. County Roscommon.

A Chara,

1.0 INTRODUCTION

The Office of Public Works (OPW) is a central Government Office operating under the Minister for Public Expenditure, NDP Delivery and Reform with particular responsibility for Flood Risk and Estate Management, including Heritage. The Office of Public Works (OPW) has responsibility for the care, operation and maintenance of all National Monuments in State Care. Our principal objective is to protect, conserve, maintain and present these sites and to facilitate appropriate public access where possible. In this regard, OPW works in partnership with the National Monuments Service at the Department of Housing, Local Government and Heritage (DHLGH).

This submission outlines observations from the OPW on this application by Carraigin Power Ltd, which is covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413), for a proposed renewable energy development which will comprise 11 no. wind turbines, and associated infrastructure in the townland of

Seirbhísí Oidhreacht, Caisleán Bhaile Átha Cliath, Baile Átha Cliath 2

Heritage Services, Dublin Castle, Dublin 2

T +353 1 645 8800 | info@opw.ie

www.opw.ie



Carrigeen and adjacent townlands in Co. Roscommon, including a 110kV substation compound (including control buildings) and associated works,

This submission is made specifically with regard to the Heritage Services portfolio. Further submissions on the project may be made by the OPW with regards to other areas of responsibility.

2.0 PROPOSED WORKS (ACP - PAX20.324167)

The proposed development will consist of the following:

- 11 no. wind turbines with an overall turbine tip height of 185m, turbine hub height of 103.5m, and rotor blade diameter of 163m and a meteorological mast with a height of 30m, and subsequent decommissioning of the wind turbines and meteorological mast, following a 35 year operational period from the date of full commissioning of the wind turbines;
- Associated wind turbines and meteorological mast foundations and hardstanding areas,
- A 110kV substation compound (Including control buildings (with a combined floor area of 594Sq.m) with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, lightening protection poles, underground wastewater holding tank, site drainage and all ancillary works);
- Underground electrical (110kV) and communications cabling from the proposed 110kV substation to the existing Flagford 220kV substation (including joint bays, communication chambers, earth sheath links, and ancillary works along the underground electrical cabling route). This cabling route is primarily located within the public road corridor;
- Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the proposed 110kV substation;
- 6 no. temporary construction compounds (including site offices and welfare facilities,
- Junction accommodation works to facilitate construction access and turbine delivery to the site (off the existing N5 and new N5 national road, and L5642 and L1217 Local Roads), including a new temporary access road off the existing N5 to the L56402,
- Upgrade of existing roads/ tracks and provision of new site access roads, junctions and hardstand areas (including of the L1217, L56402, L5642, L56421, L56492 and L56491 Local Roads), including new gated site entrances at each junction,
- 2 no. Borrow Pits;
- Peat & Spoil Management;
- Site Drainage;



- Tree felling and vegetation removal;
- Biodiversity enhancement measures;
- Operational stage site signage; and
- All associated site development works and apparatus.

A 10 year permission and an operational period of 35 years for the wind turbines, meteorological mast and site signage from the date of full commissioning of the wind turbines is sought. A permanent planning permission is being sought for all other works.

3.0 **OBSERVATION**

The observations are laid out under the following headings:

1. Rathcroghan Plateau cultural landscape and setting
2. A reliance on vulnerable trees to screen the view of the turbines
3. Assessing the planning application methodology, including against UNESCO guidelines
4. OPW Comments on Cultural Heritage Viewpoints
5. Assessment System and Outcome



3.1. Rathcroghan Plateau cultural landscape and setting

The Heritage Impact Assessment (HIA) has provided an outline of the value and significance of Rathcroghan Plateau with references to publications. The World Heritage in Ireland website provides detail on the potential Outstanding Universal Value (OUV) of Rathcroghan and of the 6-part proposed World Heritage Property, *The Royal Sites of Ireland* (RSOI)¹.

The inclusion of Rathcroghan as part of the RSOI and on the Tentative List means that the Department of Housing, Local Government and Heritage considers that it may, with the other component sites (Navan Fort, Hill of Uisneach, Dun Ailinne, Tara, Rock of Cashel) have OUV for current and future generations, i.e. it may be of international significance.

The HIA states:

‘The Project would be located within the wider landscape of Rathcroghan. The eastern cluster of turbines (T8-T11) would be located approximately 3 km to the north of the complex, with the western cluster (T1-7) located approximately 3.1 km to the north-west.’ (HIA 8.1.1).

From Rathcroghan Mound, widely considered to be the focus and principal ritual centre of the landscape, there are panoramic views to Croagh Patrick, Co. Mayo, Slieve Bloom, counties Laois-Offaly and the Cuilcagh landscape of County Fermanagh. From many points in the Rathcroghan landscape it is possible to see Keshcorran which has a passage tomb at its summit and the Bricklieve mountains, which are located approximately 30km from Rathcroghan Mound. Keash is renowned for its caves, which feature in legend and folklore. The Carrowkeel landscape is on the eastern side of the Bricklieves overlooking lough Arrow. The landscape of Kesh and Bricklieve are connected with Rathcroghan in legend or folklore.

¹ <https://www.worldheritageireland.ie/tentative-list/royal-sites-of-ireland/>

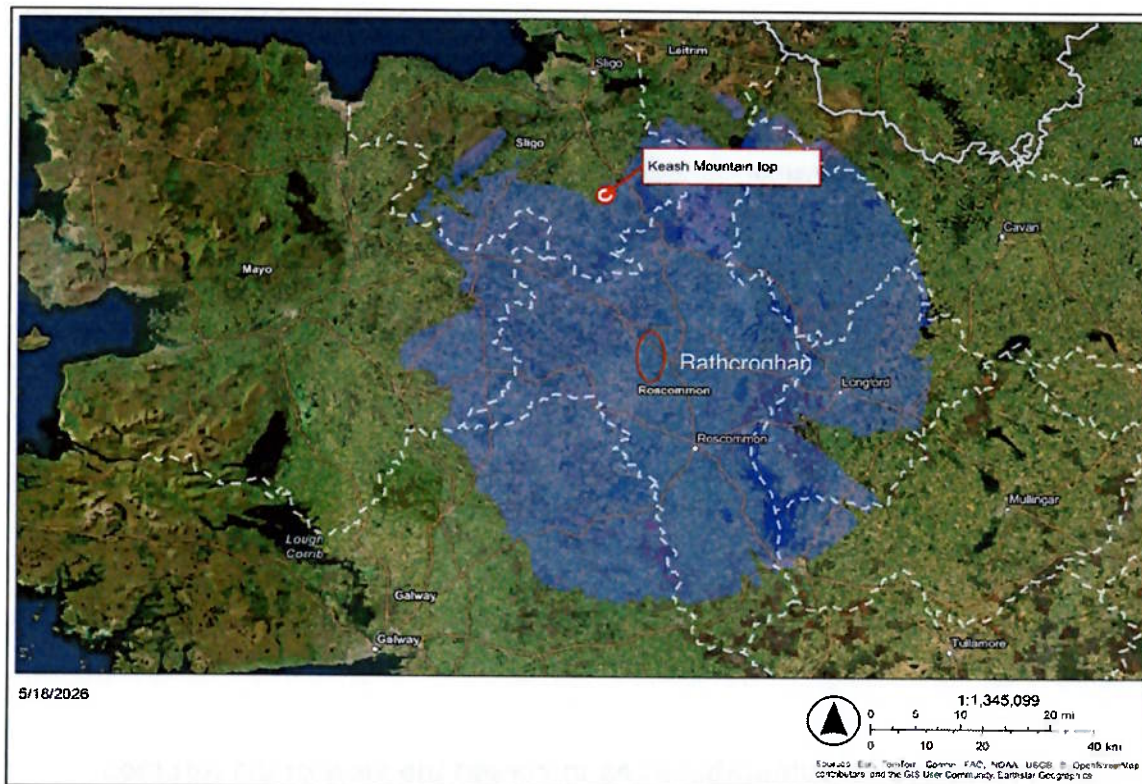


Fig. 1 View shed from Rathcroghan Mound. Image Credit: Dr Rory Connolly, Trinity College Dublin.

The viewshed analysis presented in Figure 1 was generated from a central observer point on Rathcroghan Mound, using an observer height of 6 feet, approximately 1.83 m, to represent the eye level of a standing adult.

The resulting model indicates areas of potential visibility from the mound (discounting vegetation), including the upland area of Keash/Keshcorran in Co. Sligo, marked here as 'Keash Mountain top'. This is a useful way of considering how Rathcroghan may have sat within a wider visual, mythological and remembered landscape (Figure 1). This visibility looking north is borne out by views experienced at Rathcroghan today where trees and other barriers are absent.

The visual relationship with Keash is of particular interest given the folklore recorded by Gabriel Beranger in 1779.² Notably, Beranger describes the story as 'believed in both counties',

² Gabriel Beranger's 1779 account is reproduced in W. R. Wilde's 'Memoir of Gabriel Beranger, and His Labours in the Cause of Irish Art, Literature, and Antiquities, from 1760 to 1780, with Illustrations', published in *The Journal of the Royal Historical and Archaeological Association of Ireland*, 1870, Fourth Series, Vol. 1, No. 1 (1870), pp. 33-64, 121-152, 236-260. Beranger records the belief that the Keash cave communicated with the



indicating a shared regional or landscape scale rather a local tradition. A later Dúchas Schools' Collection tradition also preserves a landscape connection between Keash and Rathcroghan, describing a stone at Ardsoran as having been thrown by a giant from Keash during an argument with a giant at Rathcroghan.³ These oral traditions show that Rathcroghan and Keash are linked in folk memory through stories of underground passage and long-distance landscape relationships.

The HIA states: 'beyond supporting an appreciation of the complex's elevated landscape in outward views from the north, that the wider landscape of Rathcroghan plays a rather limited role in supporting potential OUV.' (5.1.7) the OPW responds that the views looking north beyond the proposed turbines are views of Keash/Kish and the Bricklieve Mountains, a landscape with intangible cultural heritage connections.

The HIA states: 'In the case of large-scale and tall developments, such as the Project, issues of competition through visual prominence or distraction may arise even at long distances from the boundary of Rathcroghan. These large-scale or tall developments have the potential to appear as prominent features in valued views from within Rathcroghan and/or may compete for prominence with existing intentionally prominent features that make up the complex.' (HIA 5.1.11)

3.2. A reliance on vulnerable trees to screen the view of the turbines

3.2.1 Evergreen commercial forestry and stands of non-native conifers

The HIA assesses photomontages that contain commercial privately owned forestry and stands of evergreen trees and deciduous trees located on private land holdings. Commercial conifer forestry is a crop. Much of the forestry that is shown on photomontages and described in the impact assessment documentation as screening views of the turbines, is close to harvest stage.

Furthermore, it has been found that most of the forestry has suffered extreme wind damage. Edges have been damaged and the interiors of the plantations have been flattened. The degree of damage can be ascertained for the year 2025 by viewing the *map.apple* website referenced below.

Roscommon "Hellmouth door of Ireland" and tells the story of the woman and calf emerging at Kishcorren. Available at: <https://www.jstor.org/stable/pdf/25506575.pdf>

³ Dúchas, *The Schools' Collection: St Michael's Clooncunny*, records the Ardsoran stone tradition involving a giant from Keash and a giant from Rathcroghan. Available at: <https://www.duchas.ie/ga/cbes/4701770/4701333?SearchLanguage=en>



Fig. 2 Wind felled trees on the perimeter of a plantation



Fig. 3 Wind felled trees in the interior of a plantation

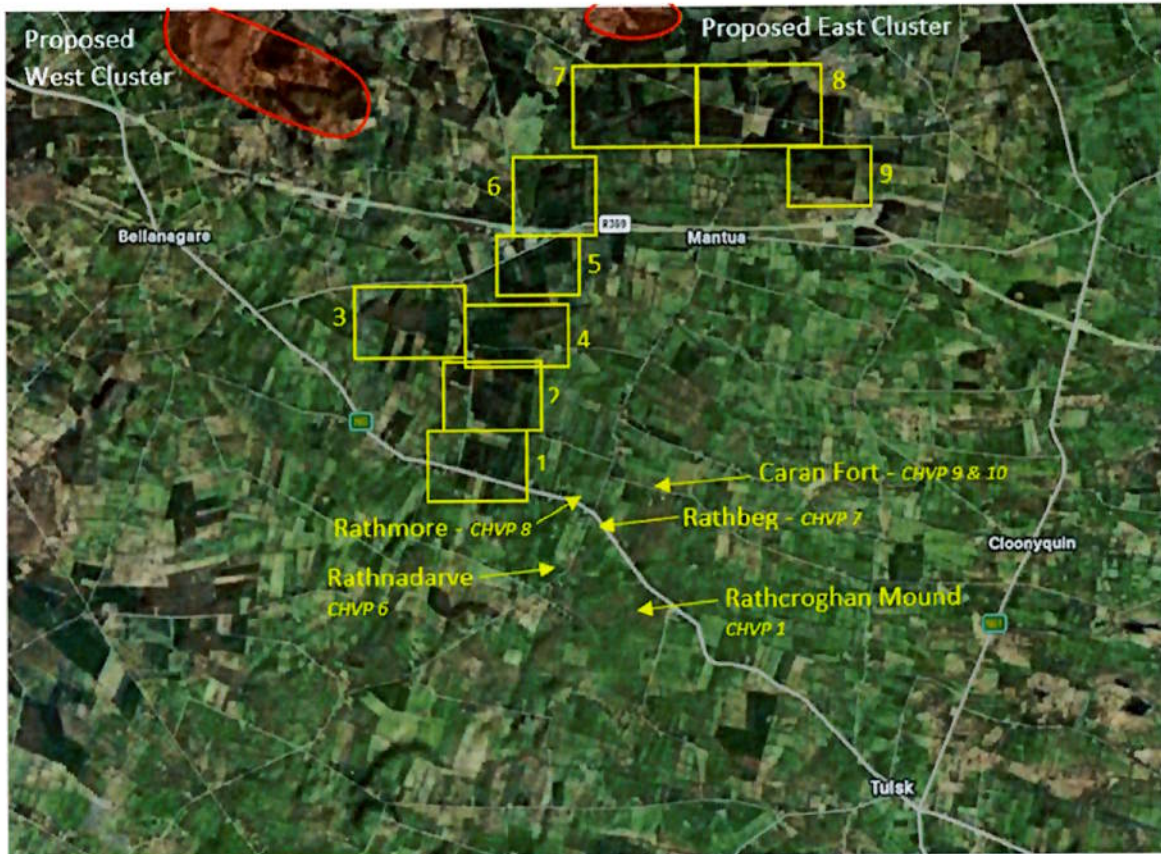


Fig. 4 Extract from *map.apple*, estimated to date from March 2025 with proposed Carrigeen turbine clusters west and east in red, locations of aerial views of forestry provided below at a greater scale, and the locations of four important cultural sites in the Rathcroghan complex

We refer ACP to the web based source material⁴, and for their convenience, Appendix 1, which contains nine close ups of the forestry as viewed from the air and referenced on the key map/aerial photograph. Figure 4 demonstrates how the screening afforded by the forestry (boxes 1-9) could, if of a similar longevity as the windfarm grant request (10 years planning permission, 35 years operation), be instrumental in the reduction of impacts on views from the Rathcroghan Plateau, and hence reduction of impact on cultural heritage. However, the above referenced aerial views depict extensive wind felling of these forestry plantations, which is not immediately apparent from the photomontages.

The OPW would argue that the commercial forestry, owned by others, cannot be considered a viable short-, medium- or long-term solution to screening of views of turbines from sensitive heritage receptors. The reasons include the normal harvesting of the commercial crop and the

⁴ <https://maps.apple.com/search?map=satellite¢er=53.822141%2C-8.310440&span=0.037650%2C0.085065>



previous and future unintentional felling of trees due to extreme weather events; the latter is predicted to become worse due to climate change.

3.2.2 Small stands of non-native evergreen/conifer trees

The Rathcroghan landscape is unusually populated with small stands of evergreen trees and short shelterbelts. These non-native trees, also suffering from wind damage, look out of place compared with the mature hedgerows and native species and are unlikely to support biodiversity. Wind felled mature or semi-mature conifers are evident throughout the landscape. It is likely that as properties change hands, that conifers that are perceived to pose a high risk to people or property may be felled. The OPW has felled trees at Rathcroghan in the last 18 months for safety reasons.

3.2.3 Ash die-back

Most or many of the deciduous trees in the landscape appear to be ash. Ash trees form part of the shelterbelt around houses and are present in hedgerows, field and road boundaries. Ash dieback is prevalent throughout the landscape and road network. It is present in trees of every age. The OPW has examined some of the stands of trees that are cited as screening in LVIA and cultural heritage viewpoints. Many of the trees are ash; some ash has already died; some is clearly affected and will die and the rest are highly susceptible to ash die-back fungal disease. This will be discussed further under individual viewpoints.

3.2.4 The effect of the loss of trees on views of the proposed turbines and distant views of Sligo

Loss of trees would open all the northern viewpoints to greater visual disturbance from the turbines. An assessment of the viewpoints has revealed that culturally significant views of distant Sligo (30km) would be expanded in the event of some removal of trees.

The applicants do not own the lands on which the forestry, trees and hedgerows are located, and therefore do not have control over their management, felling or replanting. Consideration of trees and forestry will form part of the management plan that will be developed for the proposed World Heritage Property (Tentative List, serial).

The HIA assesses the views on the basis of 'as is' and dismisses any significant degree of impact on potential OUV in the event that the trees are felled. The OPW is concerned that, taking into account the existing known vulnerabilities of the forestry plantation and trees, the current photomontages do not adequately equip an independent assessor to assess the impact. The photomontage information and the assertion in the heritage impact assessment that in the absence of trees, the impact is not of concern, is not objectively verifiable.

The OPW asks that ACP request the applicant to provide an arboricultural and hedgerow study to ascertain the condition of and risks associated with commercial forestry, evergreen and



deciduous stands of trees and hedgerows. In addition, if it is technically feasible, we would ask ACP to request verifiable photomontages/visual impact studies adjusted for the loss of trees based on this proposed expert survey and on disclosed assumptions/scenarios.

3.3. Assessing the planning application methodology, including against UNESCO guidelines⁵

Roscommon County Development Plan 2022-2028 (RCDP) has zoned the subject lands as 'less favoured' and the Rathcroghan Plateau as 'not favoured' in relation to suitability for wind development.

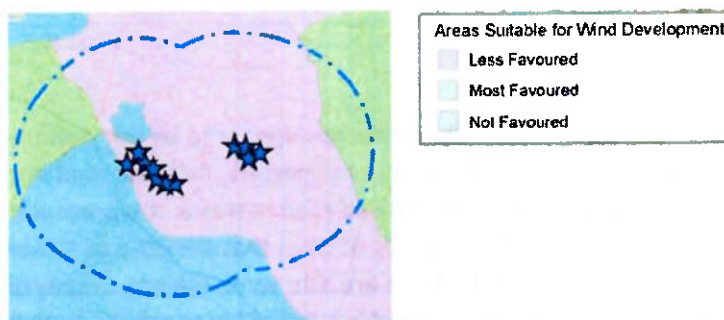


Fig. 5 The application acknowledges that the windfarm is proposed on lands zoned 'less favoured' in relation to suitability for wind development. Ref. RCDP

It is not clear how the LVIA chapter overlaps with the HIA. The LVIA establishes tiers of significance and sensitivity to change, e.g. it denotes as 'Very High': 'Areas where the landscape character exhibits a very low capacity for change in the form of development. Examples of which are high value landscapes, protected at an international or national level (World Heritage Site/National Park), where the principal management objectives are likely to be protection of the existing character.' As a proposed World Heritage Property (Tentative List, serial), this should put the Rathcroghan landscape in this category. However, the LVIA then places only Rathcroghan Mound in this category.

The OPW asks ACP to seek clarification in relation to the LVIA status with regard to Rathcroghan in the context of the HIA.

⁵ UNESCO *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022), available at: <https://whc.unesco.org/document/195279> and UNESCO *Renewable Energy Development and Impact Assessment in a World Heritage Context* (2025) available at: <https://whc.unesco.org/en/renewable-energy/assessing-impacts>



The OPW notes that most/all of the monuments assessed for cultural heritage impact in this letter are on the walking trail. As such, all are deemed to be part of a landscape of potential international significance.

In a very serious omission from the cultural heritage photomontage book, the documentation for Caran Fort and its associated barrow is incomplete (see below).

3.3.1 Assessment of process with regard to UNESCO Guidelines

1. Principle 2: 'Experts with knowledge ... about the World Heritage property/properties in question must be closely involved in the assessment process ...' Provide reference

OPW notes that Headland Archaeology, notwithstanding their expertise 'about World Heritage in general' do not have specific knowledge of Rathcroghan. Notwithstanding the site visit with the WHU, the OPW is not aware of Headland Archaeology integrating experts in the Rathcroghan landscape in their team.

2. Principle 5: Mitigation measures In the event of the identification of any unavoidable minor residual negative impacts on a World Heritage property's Outstanding Universal Value, the ESIA/HIA should outline how these will be mitigated and monitored through a budgeted environmental management plan, indicating how the mitigation measures will be implemented, who will implement them, in what time frame and with what resources.

OPW notes that the reduction in the number of turbines was driven by factors other than cultural or landscape/visual impact. Furthermore, where 'unavoidable minor residual negative impacts' have been identified [this terminology has not been used in the HIA], the application has not proposed their mitigation and monitoring through a budgeted environmental management plan.

3. UNESCO guidelines advise that 'in cases where the data or technologies available are insufficient to predict potential impacts on the OUV, the **Precautionary Principle** should be applied: alternatives or appropriate mitigation measures should be identified that ensure that the OUV of a World Heritage property is never put at risk.'

An essential set of data is the agreed OUV, its attributes, a WHP boundary a defined buffer zone and a defined setting. Research into the Rathcroghan complex is ongoing. There will be further geophysical investigation in 2026, including in the lands northwest of Caran Fort. The restriction of heritage impact assessment to physically prominent named National Monuments in the RMP zone may be considered a minimal rather than a precautionary approach. A *Precautionary Principle* would assess other points in the landscape, including the lands at the northern slopes of the plateau.

The *Precautionary Principle* would also provide an evidential base for the longevity and effectiveness of trees for screening and the resultant assessment of impact on cultural heritage.



3.4. OPW Comments on Cultural Heritage Viewpoints

3.4.1 Caran Fort – CHVPs 9 & 10

The documentation includes two viewpoints concerning Caran Fort CHVP 9 (looking towards Caran Fort) and CHVP 10 (looking from Caran Fort). Caran Fort is the most northerly monument that the applicants have selected for assessment in its Cultural Heritage photomontage booklet. It has an open view towards the proposed windfarm and towards County Sligo. No baseline photograph or photomontage has been provided for the view north from Caran Fort. Hence, the application does not assess the view looking north from the National Monument. **This fundamental omission in the planning dossier calls into question the reliability of the visual impact assessment and the cultural heritage impact assessment.** The HIA is silent on the absence of the CHVP 10 photomontage.



Fig. 8 Extract from CHVP 9a View towards Caran Fort, the extract representing the 53.5 degree view (approximately)



Fig. 9 CHVP 10a View from Caran Fort – Wireline model only provided by the applicant. No photograph provide.

It is not clear why the HIA appears to have distinguished between Caran Fort and the adjacent barrow. The OPW requests that ACP require the applicants to undertake a verifiable cultural and LVIA from the north side of the barrow adjacent to Caran Fort.



Fig. 10 Photograph (OPW) from the north/east of the barrow approximating the 53.5 degree view, based on CHVP 9a above, in the absence of a view provided by the applicant

Table 3. Viewpoints Relevant to Understanding and Experiencing Rathcroghan and its Potential OUV: CHVP 10 states that 'views from Caran Fort itself to the north and north-west are open ... but there is no clear evidence that the monument was positioned to reference any of these natural features'. The HIA restricts itself to assessing the impact on 'a visitor's ability to experience the lower lying land to the north which may have been associated with Caran Fort.' The OPW refers to the intangible cultural heritage links between Rathcroghan and Keash as outlined above. It is the opinion of the OPW that the 'open views' to the north inform the values of the cultural landscape.

The OPW reiterates its concern about relying on deciduous trees, many of which are ash, and small stands of conifer trees, in the ownership of others, to screen the views of the turbines.



3.4.2 Rathcroghan Mound - VP 17, CHVP 1



Fig. 12 Extract from the Wire Model and photomontage showing west and east clusters



Fig. 13a Extract from photomontage. Looking west towards west cluster. Rathbeg is located in the mid ground. The view beyond the forestry and the stands of trees is towards Sligo. See Rathbeg analysis.

The applicants are reliant on commercial forestry owned by others to screen the view of the turbines. The deciduous trees that form the background to Rathbeg are privately owned. May



are ash. In the event of tree felling/loss, the turbines would be visible behind Rathbeg, with Keash and the Bricklieve mountains in the distance.

The HIA states: 'Based on a worst case scenario, assuming the trees which screen the turbines were all felled, the proposed turbines would, whilst not directly backdropping Rathbeg in views towards it from Rathcroghan Mound, visually compete with it, distracting from its intended prominence and from its visual and contextual relationship with Rathcroghan Mound.' it is the OPW's opinion that combined with the likely loss of ash trees behind Rathbeg, the visual disturbance when looking at Rathbeg and in the direction of Rathmore would be significant.

Three of the turbines of the eastern cluster are very visible, made more visible in the event of future tree loss.



Fig. 13b extract from CHVP 1 - view of east cluster and extent of reliance on screening by trees



3.4.3 Rathbeg, NM No. 294 – CHVP 7

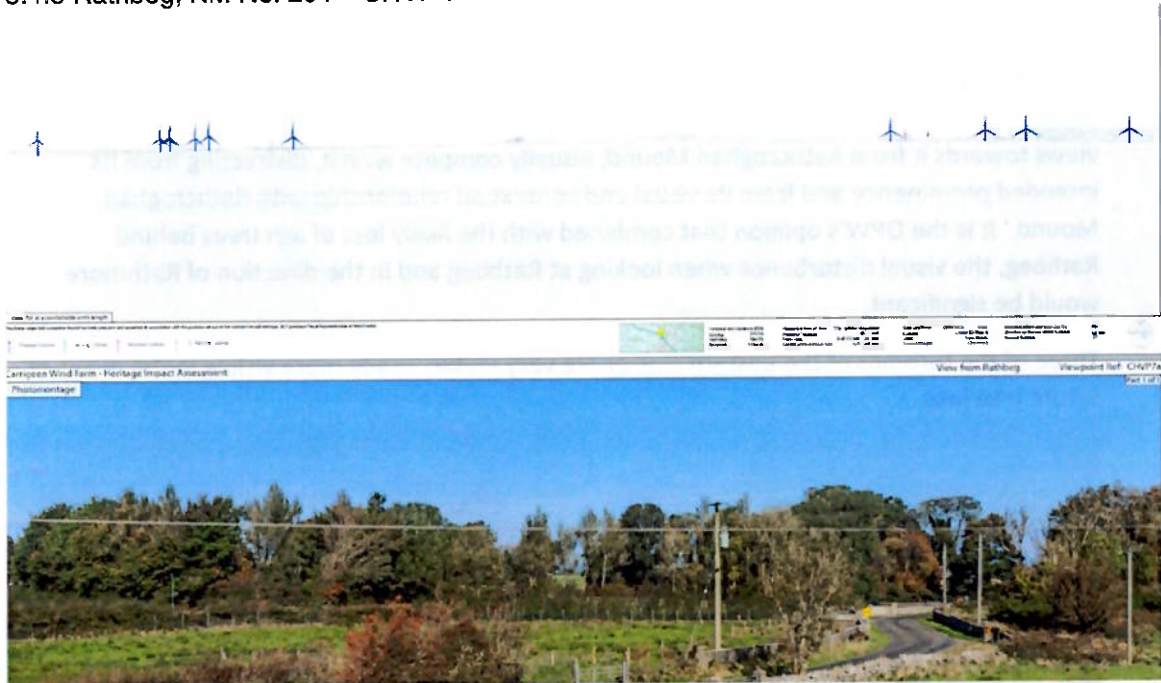


Fig. 14 CHVP 7a view from Rathbeg through mature trees around two privately owned dwellings



Fig. 15 Magnified view of the Bricklieves through the gap in the trees.

Above is the distant view from Rathbeg behind the trees, which appear to be mostly ash, in the mid-ground. The ash trees are visibly suffering from ash die back. It is anticipated that the view will open up in the near future as diseased trees are removed.



Fig. 16 Gmap streetview of trees (date?) that are screening views of the east cluster of proposed turbines. Diseased ash is visible. Many trees have already been felled at this property.

The views from Rathcroghan and Rathbeg are closely related. Rathmore has a similar orientation relative to the proposed windfarm.

3.4.4 Rathmore, (Guardianship) - CHVP 8a

With regard to the 2-3 conifers and the telegraph post in the foreground (Fig. 17) that split the view of the west and east turbine clusters, it should be noted that a future management plan will include consideration of trees and above ground local electricity infrastructure, and the OPW would urge ACP to treat this as a single view. If the two/three trees in the foreground and the telegraph pole were removed the scale of the landscape would alter considerably as would the perception of scale and disturbance of the proposed turbines.



Fig. 17 Extract from CHVP 8a with 'as is' photograph above

West cluster



Fig. 18 Extract from CHVP 8a west cluster photomontage

The HIA acknowledges that the turbines will be visible. It does not address the increase in visibility resulting from felling of the forestry, possibly because the forestry has a limited ability to screen the base of the hubs. As previously stated the forestry plantations and the stands of semi-mature conifers that partially screen the turbines are not reliable. As such, it may be anticipated that most of the full height of the turbines will be visible in this view.



Fig. 19 Wireframe for CHVP 8a

East Cluster

The ruins of a herdsman's cottage are located next to a later building. This cottage appears in the first edition ordnance survey map. At present, the trees screen the view of one of the turbines. The turbine if erected will be visible due to the loss of the ash trees to ash dieback.

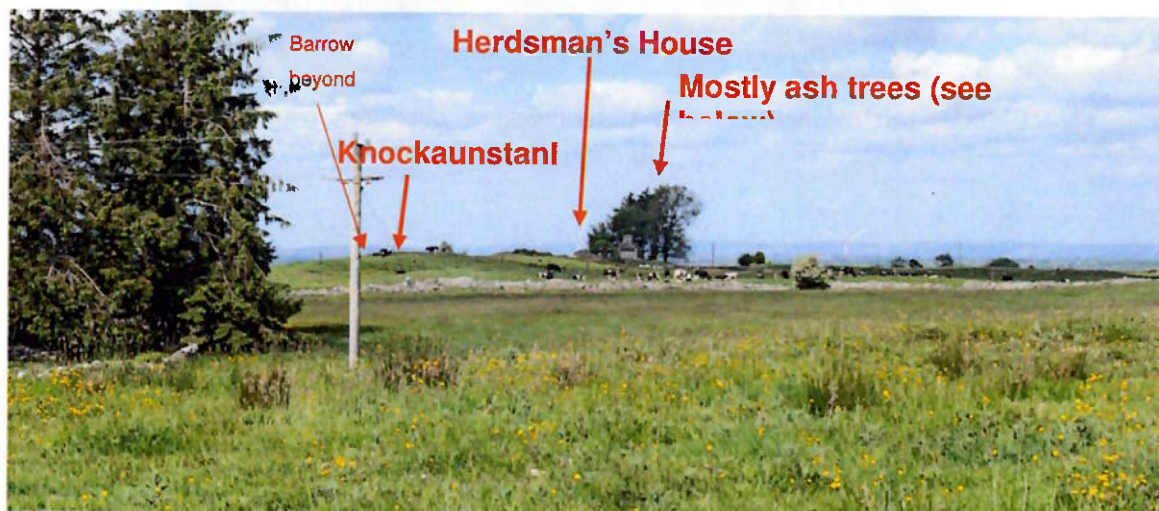


Fig. 20 View from Rathmore National Monument towards the east cluster with Knockaunstanley in the mid-ground, a dwelling and the remains of an earlier herdsman's hut



Fig. 21 Most of the trees adjacent to the later dwelling house are ash and are visibly suffering from ash die-back.

Behind the 2-3 evergreen trees in the foreground, Keash and the Bricklieves in Sligo are revealed.



Fig. 22 Distant view behind the 2-3 conifers in the foreground. View of Bricklieves (magnified)



3.4.5 Rathnadarve, NM No. 473 – CHVP 6

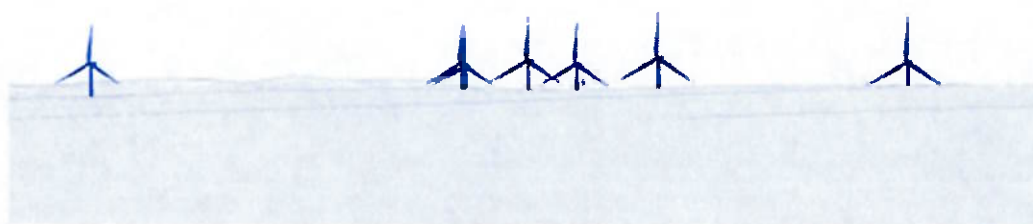


Fig 23 Wireframe of the 7no. turbines of the west cluster



Fig. 24 View of the 7no. turbines of the west cluster partially screened by existing forestry



Fig. 25 Detail of the photomontage above revealing storm damage to the periphery trees

Based on the wind damage to the forestry plantation as visible from the air, it is anticipated that the forestry will be felled and all of the turbines will be visible. The wire model has not indicated the location of Rathcroghan Mound, however, the HIA states that it will not be noticeable in this view. The OPW is requesting that ACP ask the applicant to indicate the location of Rathcroghan Mound.

3.4.6 Omission of views from the north side of Rathcroghan Plateau

The OPW notes that this landscape is a continuous cultural landscape, and not a series of culturally significant points in a void. The Rathcroghan Plateau extends beyond the chosen Viewpoint locations. The northern edge of the RMP zone (blue) is close to the edge of the plateau.

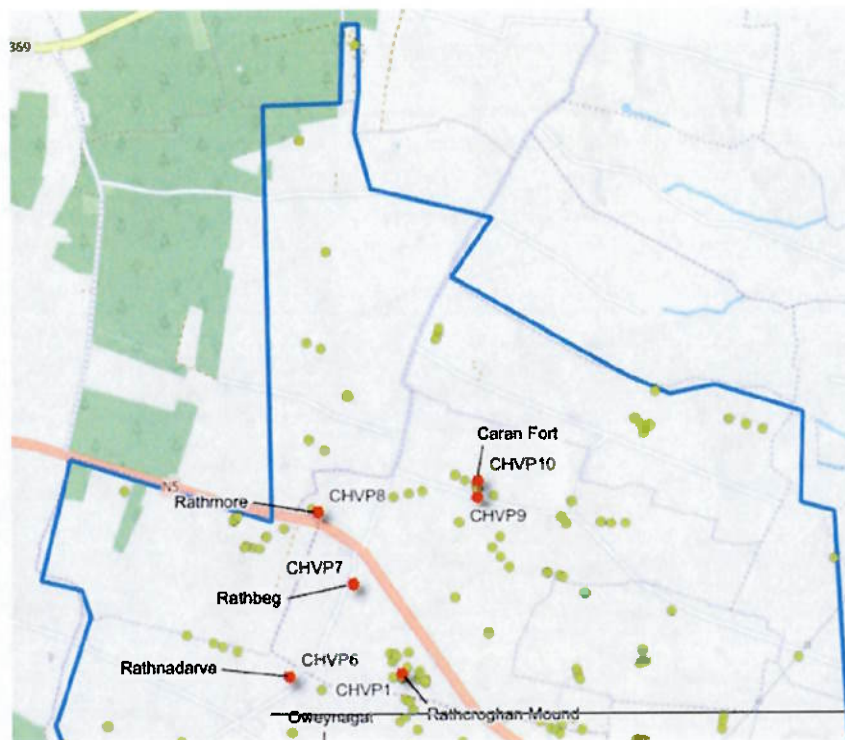


Fig. 26 Northern section of the RMP zone with CHVPs marked and SMRs from the application

In addition to archaeological sites contained within the RMP boundary and north of Caran Fort, there may be other monuments identified in defining the OUV, attributes and the WHP boundary for this component site. The HIA has not provided a rationale for the selection or omission of views.

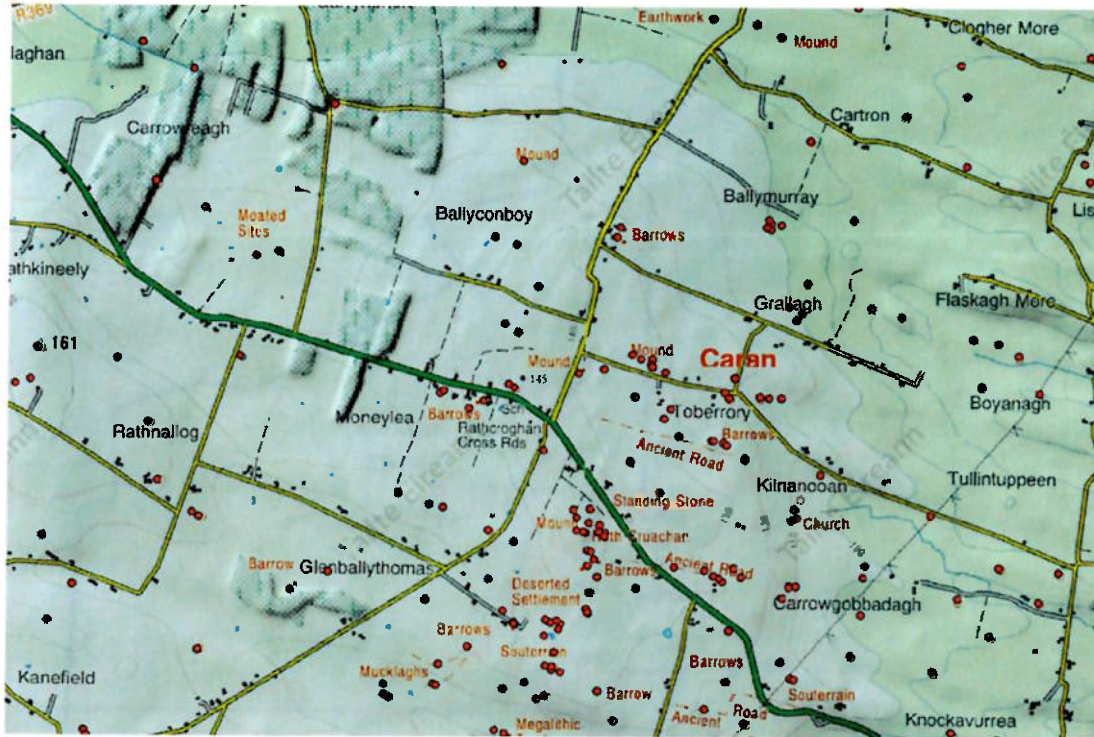


Fig. 27 Screenshot from archaeology.ie with terrain map. This shows the extent of the plateau as it falls to the north and the distribution of archaeological sites.

Headland Archaeology noted that the use of the RMP boundary as a proxy due to the lack of definition of the OUV, WHP and buffer zone. Other National Monuments in state care located at the north of the plateau are: Toberrory Fort, Rathscrag Fort and Courtmoyle. The HIA has noted the relatively open views to the north towards Sligo. The loss of some of the commercial forestry would open the view towards Keash.



3.5 Assessment System & Outcome

HIA Table 4 has assessed the impact on potential attributes as outlined in 2022. It described the proposed windfarm as long-term, reversible and temporary. It describes the *Degree of Change* as 'Negligible', the *Quality of Change* as 'Negative' and the *Evaluation of Impact* as 'Minor negative impact.'

ELEMENT OF PROPOSED ACTION	ATTRIBUTE	DESCRIPTION OF POTENTIAL IMPACT	FREQUENCY OF ACTION	DURATION OF ACTION	REVERSIBILITY OF ACTION	REVERSIBILITY OF CHANGE TO THE ATTRIBUTE	LONGEVITY OF CHANGE TO THE ATTRIBUTE	DEGREE OF CHANGE TO THE ATTRIBUTE	QUALITY OF CHANGE TO THE ATTRIBUTE	EVALUATION OF IMPACT
Operational wind farm phase	Hill top location with excellent visibility in and out	Visibility of operational wind turbines. The presence of the proposed turbines within the wider landscape may distract from the elevated landscape position of Rathcroghan	Continuous	Long term	Reversible. The action would be reversed after the Project is decommissioned	Reversible. The action would be reversed after the Project is decommissioned	Temporary (limited to the lifespan of the Project)	Negligible	Negative	Minor negative impact

Fig. 28 extract from HIA Table 4, which references *Impact of Project in Isolation on Attributes of Tentative WHP (adapted from UNESCO 2022, page 86)*

Degree of Change	Summary
Large	Changes to most or all key archaeological materials, including those that contribute to OUV such that the resource is totally obliterated. Comprehensive changes to setting. Change to most or all key historic landscape elements, parcels or components, extreme visual effects, gross change of noise or change to sound quality, fundamental changes to use or access resulting in total change to historic landscape character unit and loss of OUV. Major changes to area that affect intangible cultural heritage activities or associations or visual links and cultural appreciation.
Some	Changes to many key archaeological materials, such that the resource is clearly modified. Considerable changes to setting that affect the character of the asset. Change to many key historic landscape elements, parcels or components, visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, considerable changes to use or access, resulting in moderate changes to historic landscape character. Considerable changes to area that affect intangible cultural heritage activities or associations or visual links and cultural appreciation.
Negligible	Changes to key archaeological materials, such that the resource is slightly altered. Slight changes to setting. Change to few key historic landscape elements, parcels or components, slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality, slight changes to use or access, resulting in limited change to historic landscape character. Changes to area that affect intangible cultural heritage activities or associations or visual links and cultural appreciation.
No change	No change to fabric or setting. No change to elements, parcels or components, no visual or audible changes, no changes in amenity or community factors.

Fig. 29 extract from HIA Table 1: Criteria for Assessing Degrees of Change (after Table 15.2 of ICOMOS 2011, 17)

The OPW does not agree with this finding. The OPW believes this is the outcome of shortcomings in the deep knowledge of the landscape, omissions and inadequate assessment of the impact of tree loss/felling on the view and perception of the turbines. Headland have used ICOMOS Guidelines dating from 2011, reproduced here. It is the opinion of the OPW that



'Some' change better reflects the likely impact at Rathcroghan rather than 'Negligible' change based on the ICOMOS definitions.

4.0 CONCLUSION

The OPW has demonstrated the cultural links between Rathcroghan and the Kesh/Carrowkeel complex (Bricklieve Mountains) located 30km to the north and northwest of Rathcroghan Mound, i.e. the setting of Rathcroghan.

The OPW has demonstrated that the forestry and many of the trees cannot be relied upon for screening for reasons of climate related damage, ownership and disease. Removal of commercial forestry and trees will result in the opening of views to the north and northwest, further revealing the turbines and the Sligo backdrop.

The OPW is concerned about the completeness of the documentation (Caran Fort), lack of disclosure regarding selection and omission of viewpoint locations. The HIA has not demonstrated application of the Precautionary Principle (UNESCO). The OPW does not agree with the outcome of 'Minor negative impact'. Furthermore, the OPW is unclear as to the status of the LVIA and its statements above tiered significance and sensitivity, in relation to the HIA report.

The OPW requests that ACP:

- require the applicant to provide an expert survey and assessment of the forestry and trees
- and that verifiable visual/cultural impact assessment is carried on foot of its findings.
- have an independent World Heritage expert with knowledge of Rathcroghan advise ACP in its assessment.

The OPW requests that An Coimisiún Pleanála take into consideration the concerns raised in this letter.

Yours sincerely,

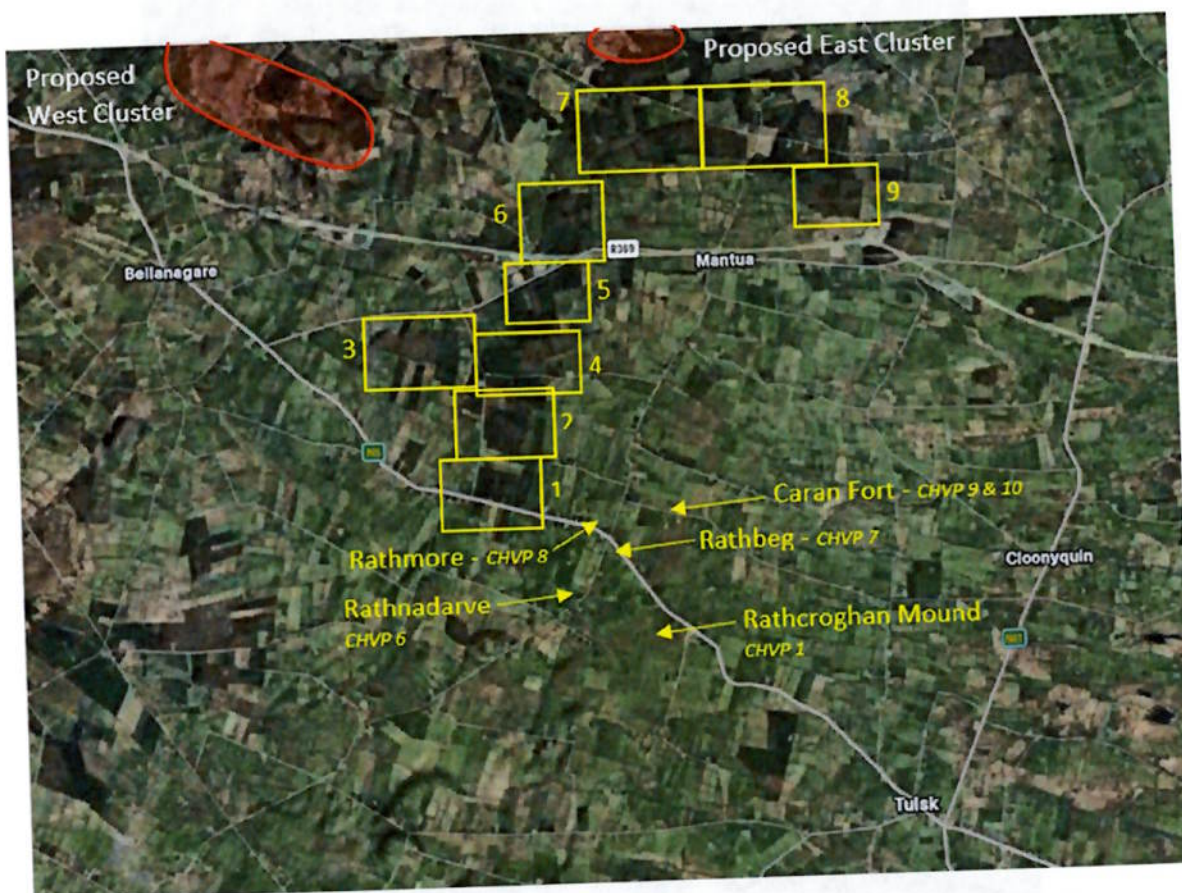
A Read

Anthony Read
Principal Officer
Heritage Policy & UNESCO World Heritage Unit

See Appendix over leaf



Appendix – Extent of wind felling of forestry plantation. Aerial views (2025)



Extract from Aerial Photograph on map.apple, estimated to date from March 2025 with proposed Carrigeen turbine clusters in red, locations of aerial views of forestry provided below at a greater scale, and the locations of four important sites in the proposed World Heritage Property – Rathcroghan complex

Aerial Views of Wind felled forestry from south to north overleaf



Forestry Aerial View 1



Forestry Aerial View 2



Forestry Aerial View 3



Forestry Aerial View 4



Forestry Aerial View 5



Forestry Aerial View 6



Forestry Aerial View 7

