



The Planning Section  
Westmeath County Council

30<sup>th</sup> June 2020

**Re: Consultation on Draft Westmeath County Development Plan**

Dear Sir/Madam,

Thank you for the opportunity to comment on the draft Westmeath County Development Plan. On behalf of the Heritage Council (a prescribed body under the Planning Acts) the following comments are provided relating to the Hill of Uisneach which is also on Ireland's Tentative UNESCO World Heritage Site list.

The Heritage Council has provided funding this year to Westmeath County Council to complete a conservation management plan for the Hill of Uisneach under the County Heritage Plan funding programme. We are currently involved in an advisory group set up to assist in the compilation of this plan. The preparation of this plan is a commitment in the Westmeath County Development 2014-20 and such a plan will propose policies for the protection and enjoyment of this complex.

One of the issues that has been identified as part of this process is a concern about the potential impact of wind energy development on the setting of the Hill.

**Existing policy**

We note the existing policy framework for wind energy in County Westmeath, namely Variation no. 1 to the Westmeath County Development 2014-20 which deems all of County Westmeath as 'Low Capacity' with a small area around the Hill of Uisneach as being of 'No Capacity'. This variation was based upon the 2006 Wind Energy Development Guidelines.

We also note that the Development Plan 2014-20 has a single protected view relating to the Hill of Uisneach, no.18 '*Views from the R-390 Regional Road at Lunestown towards "Hill of Uisneach" to the north and out over Killare to the west.*'

The inclusion of a Landscape Character Area for the Hill of Uisneach is also understood under the County Development Plan 2014-20. Policies for this area include the completion of a management plan and public ownership.

We note the Draft Revised Wind Energy Development Guidelines (December 2019) from the Department of Housing, Planning and Local Government which state ‘Also encompassed are intervisibility and interrelationships between archaeological heritage within the wider landscape, including crossborder intervisibility and interrelationships.’ This document also notes the importance of World Heritage Sites and Ireland’s Tentative List.

### **Emerging County Development Plan 2021-27**

We note the strengthened provisions relating to the Hill of Uisneach in the emerging Development Plan 2021-27. Specifically, the designation of the Hill as a High Amenity Area, the provision of panorama view and buffer zones, policies CPO 13.17-18, and its place in the Wind Energy Capacity framework.

### **World Heritage context**

On the outgoing Tentative List for World Heritage we note the inclusion of the Hill of Uisneach as an element of the Royal Sites of Ireland potential designation. The process for the renewal of this Tentative List is ongoing but the participation of Westmeath County Council in this process managed by the National Monuments Service is understood. When heritage sites are moved from a tentative list to inscription on the World Heritage List, the World Heritage Committee adopts a Statement of Outstanding Universal Value (OUV). Such a statement explains how the site or place meets the relevant WHS criteria, how the conditions of authenticity and integrity are fulfilled and how the OUV will be cared for over time through management and protection.

According to UNESCO ‘integrity is a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes’. This includes not just the physical condition of the monument but also its setting. Various processes are used to assess impact on OUV, these include the Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS 2011).

### **Comment**

Based on the foregoing we comment as follows:

Monument complexes such as the Hill of Tara, the Hill of Uisneach, the Hill of Cashel and others, which are generally referred to ‘Royal Sites’ are typically located in elevated positions with carefully chosen views in the landscape. These views were carefully selected and often include inter-visibility and inter-relationships with topographic and built features of the landscape. As such the setting is a key element of their integrity and meaning. This issue as it relates to wind energy developments is set out in the Heritage Council (2014) publication *Planning for Harmony between Wind Energy and Heritage in Ireland*.

The proposed provision of protected panoramic views of this complex under the emerging County Development Plan is noted. To build upon this we suggest that the mapping of key views to and from the Hill of Uisneach should be undertaken in a systematic manner to care for the integrity of this complex. Key inter-visible relationships may be, for example, the early to middle Bronze Age burial site on Knockast hill (Coolatoor td RMP WM031-015), excavated by the Harvard Irish Archaeological Expedition in 1932 (approximately 7km to the southwest of Uisneach); the impressive prehistoric barrow cemetery at Frewin Hill, (Wattstown townland, 13km to the northeast) which is also visible from Uisneach; and the prehistoric barrow on Croghan Hill, Co Offaly (24km to the southeast).

This point about inter-visibility and relationships takes on a greater importance given the changes to the status of the Western Lowlands Character Area (no. 7) from Low Capacity for wind energy (2016 Development Plan variation) to Medium Capacity in the 2021-27 Development Plan.

We are unclear as to the status of the panoramic views for the Hill of Uisneach set out in Map 46 which do not appear to be detailed in Appendix 5 List of Protected Views and Amenity Areas.

The relatively wide area of visibility from the Hill of Uisneach means that developments in other local authority areas, such as Offaly and Longford, and not just Westmeath, need careful consideration. Attention to regional planning policy may be required in this context, particularly in the case of wind energy developments.

### **Conclusion**

Prior to the completion of the conservation management plan, the opportunity to highlight these issues during the initial consultation period for the emerging Development Plan is being availed of.

In summary,

- i) we point out that in the case of the Hill of Uisneach setting is a key element of integrity and meaning.
- ii) We are unclear as to the status of the panoramic views for the Hill of Uisneach set out in Map 46
- iii) The proposed changing of the wind energy capacity status of the Western Lowlands to 'Medium capacity' needs to be examined in relation to key views from the Hill of Uisneach
- iv) Attention to regional planning policy may be required, particularly in the case of wind energy developments

Yours sincerely



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