



Planning Ref: 2460766

28 January 2025

Planning Section
Louth County Council
Dundalk
A91 KFW6

Dear Sir/Madam

Re: 2460766 – Construction of 5 Wind Turbines and associated works [Kellystown Windfarm] AT, Brownstown, Carntown, Carstown, Cartanstown, Castletown, Drumshallon, Gallstown, Groom, Kearneystown, Keeverstown, Killineer, Mell, Newtown Monasterboice, Piperstown, Stonehouse, Swinestown, Tullyallen, Tullyard, and Tullyeskar, Co. Louth

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council support efforts to increase renewable energy rollout in Ireland. Increased global temperatures and changing climate patterns will pose risks to natural ecosystems and habitats. Therefore, we acknowledge the need to roll out renewable energy schemes, to reduce the country's carbon emissions. However, there is a need to ensure that such developments do not compromise the integrity of country's internationally designated heritage assets.

Both the Cultural Heritage Chapter (Chapter 15) and the Landscape and Visual Chapter (Chapter 12) have assessed, to some extent, the potential impacts that the development may have on the Brú na Bóinne World Heritage Property (WHP), which is located 12.5km from the proposed development site. The Heritage Council notes in the Cultural Heritage Chapter assessment that the WHP is outside both the study area (1km) and the wider landscape setting (10km). Albeit the EIAR does simultaneously acknowledge that the Landscape and Visual Assessment Chapter did include a 20km radius in its particular assessment.

Whilst there may be no statutory guidance to define the extent of study areas required to assess the effects of wind farm developments on the cultural heritage resource, the

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Heritage Council caution against arbitrary specific distances; and consider that the potential impacts of a development depends on a combination of the receiving environment; the nature and scale of the proposed development; and the pathway of the potential impact.

The Landscape and Visual Assessment chapter has identified several viewpoints that are considered as part of the 20km Zone of Theoretical Visibility (ZTV) around the development. Of particular interest to the Heritage Council are VP21, VP22, and VP23 and VP24. The EIAR has rightly identified that the landscape and visual impact interact with the cultural heritage chapter and the Heritage Council would emphasise that when assessing such important heritage assets, that it is imperative that this is recognised i.e. the landscape and cultural impact assessments are closely intertwined.

In terms of VP21 to VP24 (which relate to the Brú na Bóinne WHP, and the Hill of Slane), the EIAR has noted that the Hill of Slane, Dowth, Knowth and Newgrange will have “glimpse views” of the proposed development. The views from the three passage tombs associated with the Brú na Bóinne WHP are considered to experience “*indirect long-term negative impacts of negligible-low magnitude*” as “*Very High value receptors*”, resulting in “*Slight significance of effect*”. The Hill of Slane is expected to experience a similar significance of effect.

The Heritage Council contend that whilst a cultural heritage assessment has been carried out, it lacks the necessary assessment methodology that is required for a world heritage property. Any negative impact on one of the country’s two world heritage properties, no matter how slight, is of concern. Any development in the vicinity of a world heritage property, that is assessed, and which may have an impact, should have a full Heritage Impact Assessment (HIA) that specifically addresses the Outstanding Universal Value of the world heritage property in question, and the component attributes that constitute this value. This is particularly required for a development of this scale which will undoubtedly be seen from Brú na Bóinne.

The cultural heritage chapter itself has rightly identified Policy Objective BHC14 of the Louth County Development Plan 2021-2027, which “*seeks to work in partnership with Meath County Council, relevant agencies and the public to promote, understand, conserve and sustainably manage the UNESCO World Heritage Site of Brú na Bóinne to maintain its Outstanding Universal Value (OUV)*” [emphasis added]. While Policy Objective BHC 15 seeks to “*ensure no development which might have significant deleterious impacts upon the character of the World Heritage Site is permitted*”.

The Cultural Heritage Chapter and the Landscape and Visual Chapter have considered and assessed the Brú na Bóinne WHP as part of the overall assessment. The Heritage Council recommend to Louth County Council that an assessment of impact on the WHP can only be done if the methodology is specific to the Outstanding Universal Value (OUV) of the WHP. There is already precedent for this in recent schemes in the wider landscape

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setting of Bru na Boinne¹. This should be standard practice going forward for developments in the wider landscape setting of UNESCO sites.

Given the hub and tip height of the turbines, and the associated scale of development, the Heritage Council believes that the Cultural Heritage Assessment needs to incorporate a HIA based on the OUV, and we recommend that further information is requested to complete this further analysis. This is required in order to ensure compliance with Policy Objective BHC14, and BHC15 of the Louth County Development Plan 2021-2027.

We would also note that although there are 'imperceptible' effects assessed with respect to the Monasterboice Abbey Monastic complex, the planning authority will need to satisfy itself that the development does not undermine any aspirations for UNESCO status at this location. This is needed to comply with Policy Objective BHC 19 of the Louth County Development Plan 2021-2027. This policy seeks to maintain the *Outstanding Universal Value (OUV) of the Tentative World Heritage Site of Monasterboice and support its nomination as a UNESCO World Heritage Site*.

Yours sincerely

Virginia Teehan

Chief Executive Officer

¹ [Planning Application - N2 Slane Bypass](#)

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