



Planning Department
Wicklow County Council
County Buildings,
Whitegates,
Wicklow Town

2nd March 2021

By email to: plandev@wicklowcoco.ie

Re: Planning application 21/60 proposed windfarm at Kilranelagh, Co Wicklow

Sir/Madam

The Heritage Council is a prescribed body under S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia. The above referenced planning application at Kilranelagh townland has come to our attention and we make the following comments relating to it.

Existing provisions:

We note volume 3, appendix 5 of the 2016-22 Wicklow County Development Plan which identifies the Baltinglass Hills as an Area of High Amenity with the following policy

5.3.8 Baltinglass Hills KDC (Appendix 4 Map 10.13(c)) 1. To protect the important archaeological remains and monuments located within the Baltinglass Hills. 2. In order to protect views towards the natural hill formations, development within or surrounding the Baltinglass Hills landscape area should be sited in a manner which avoids intrusions on ridge lines or impacts negatively on the natural sky-line.

The 2016-22 Wicklow County Development Plan, Chapter 10, Heritage describes the Areas of High Amenity:

3(d) - The Baltinglass Hills The rolling undulating terrain of the hills around Baltinglass, characterised by the existence of important archaeological remains and monuments. This area is of significant heritage value while also forming a key tourist attraction within this area

We also note the built heritage policies which state:

BH1 No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value

BH5 To protect the Hillforts in west Wicklow and to engage with the relevant central Government department to seek to undertake a detailed study of their importance

We note the cultural heritage element of the EIAR supplied as part of the planning application. This references the recent work carried by archaeologists from University College Cork led by Prof William O'Brien on the hillforts of the Baltinglass Hills. This work informed a detailed paper by Prof O'Brien which was published in the *Proceedings of the Royal Irish Academy* in 2017 (Vol. 117C (2017), pp. 3-61) entitled 'The development of the hillfort in prehistoric Ireland.' The majority of this work was funded by the Irish Research Council, while further funding for excavations at Rathcoran Hillfort was provided by the Royal Irish Academy/National Monuments Service Archaeological Research Excavations Grants scheme. Funding for surveys at Spinans Hill was also provided by the Heritage Council in 2017.

What is clear from this work is that the Baltinglass landscape is critical for the understanding of hillforts in Ireland and this is of international significance.

We comment as follows:

The Baltinglass cluster comprises nine of the largest hillforts in Ireland, situated in a landscape with numerous monumental ritual and secular monuments from all periods of history. It has been described in 1992 as 'Ireland's hillfort capital' (EIAR, p330), having the single largest concentration of these monuments. These hillforts are sited overlooking the town of Baltinglass, on the highest points of a series of prominent hills orientated east-west, adjoining the southwestern section of the Wicklow Mountains. This significance is underpinned by existing County Development Plan policy BH5 '*To protect the Hillforts in west Wicklow...*'.

Significance

The results of the ongoing research have demonstrated that there is an important Bronze Age phase in the construction of these elaborate and impressive monuments but there is also an important Neolithic phase of use. The National Monument at Rathcoran/Baltinglass Hill (National Monument No. 328) has been long recognised as a Neolithic passage tomb, however the recent dating of the enclosures at Rathcoran, Spinans Hill 2 and Hughestown suggest earlier occupation and more extensive activities on these hilltops during the Neolithic period (EIAR p412). This, we contend, is a strong reason to refuse permission for the proposed development in so far as recent research has demonstrated a longer sequence of occupation than previously suspected. This adds to the significance of this hillfort complex. While previously this complex was assumed to be of national significance, it can now be stated that this complex is of international significance based on the occupation sequence identified through archaeological excavation. This adds significantly to our understanding of the human transformation of the landscape over the course of the prehistoric period.

Inter-visibility/setting of monuments

In the case of the monuments in the Baltinglass Hills there are key points of inter-visibility e.g. Brusselstown Ring and Spinans Hill to Kilranelagh Hill; and Baltinglass Hill/Rathcoran passage tomb and hill fort to the cursus on Keadeen Mountain. Such alignments are not unintentional but appear to be a key element in the inter-relationship between monuments in this complex.

The EIAR sets out criteria for assessing impacts on the setting of monuments (EIAR p411). This is where a development changes the surroundings of a monument in a manner that affects the significance of that heritage asset. Table 12.11 of the EIAR presents the key monuments and assesses the level of impact on their setting. The methodology (e.g. a matrix, means of calculating, the points set out on p411) used to arrive at this impact assessment is not clearly set out. Bearing this limitation in mind the impact on the setting of following monuments is deemed to be:

- 'overall significant' for Kilranelagh Hill hillfort
- 'overall moderate impact' for the cursus monument on Keadeen Mountain
- 'overall significant impact' for Spinans Hill hillfort – b1 and 2? What about Brusselstown? Ring
- 'overall significant impact' for Brusselstown Ring hillfort

Just as in the historic period, the concept of a designed landscape, e.g. a garden or demesne, is accepted, in an archaeological context there is acceptance of a monumental landscape where deliberate visual connections to other monuments or to prominent points in the landscape are made.

In terms of a north-south axis, the view from the hillforts at Brusselstown Ring and Spinans Hill across to Kilranelagh Hill (hillfort and cairns) (see illustration wireframes 12.6 - 12.7, p452-53) are key elements of this monumental landscape. The placing of a windfarm into these axes will visually intrude into this monumental landscape which retains highly legible traces of prehistoric settlement and ritual.

There are east-west views from Baltinglass Hill/Rathcoran (hillfort and passage tomb) towards Keadeen Mountain (with a cursus and cairn) (see illustration wireframe 12.1- 2, p451, 454) and from Rathnagree hillfort to Keadeen Mountain (see illustration wireframe 12.3, p454). These key east-west views will be impacted upon in a negative way.

Furthermore, all views of Kilranelagh hill and the significant cluster of monuments on it will be visually impacted.

Moreover, we contend that this development is not in accordance with policies for the Baltinglass Hills as an Area of High Amenity (volume 3, appendix 5 of the 2016-22 Wicklow County Development Plan) in so far as it *'impacts negatively on the natural sky-line.'*

Future policy

The Heritage Council will make the point in the consultation for the emerging Wicklow County Development Plan 2021-27 that there should be a presumption against wind energy in the Baltinglass Hills area.

We will also suggest that given its international significance and value in due course consideration should be given to making a submission to Ireland's UNESCO World Heritage Site (WHS) Tentative List for the Baltinglass Hills hillfort complex.

We urge the rejection of this proposed development for the reasons set out above.

Yours sincerely

Ian Doyle
Head of Conservation