An Archaeological, Architectural and Cultural Heritage Impact Assessment Report for the Proposed Drumdowney Substation and Grid Connection, Co. Kilkenny

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EXECUTIVE SUMMARY

The purpose of this report is to assess the importance and sensitivity of the known, as well as the potential archaeological, architectural and cultural heritage environment for a Strategic Infrastructure Development (SID), comprising a proposed substation and grid connection situated in the townland of Rathpatrick, Co. Kilkenny. The report also aims to assess the potential of the proposed development on the known and potential archaeological, architectural and cultural heritage. This study was undertaken for HW Planning on behalf of Terra Solar Ltd. by Rubicon Archaeology Limited.

The proposed development comprises a substation and grid connection which forms part of the Drumdowney Solar Farm, Co. Kilkenny (Planning Ref. 25/60391). The proposed substation will be a 110 kV Insulated Switchgear (GIS) electricity substation with the associated grid connection comprising cabling which will connect to the existing 110 kV Great Island to Waterford overhead line via two newly constructed interface towers. A decision is pending on the proposed solar farm, which is the subject of a separate archaeological impact assessment (Hinckley, Pawle, Morgan-James and O'Sullivan 2025).

The proposed development is situated *c*. 4 km north-east of Waterford city, in the townland of Rathpatrick. The landscape of the proposed development site is currently agricultural fields under grass, set in a largely rural area with dispersed one-off developments.

The archaeological assessment has identified 19 sites of archaeological, and/or cultural heritage significance within the study area (Section 1.3). These include 11 known or suspected monuments, one Protected Structure (CH207), which is also an NIAH site, and five previous excavations.

The proposed development will have no direct effect on any known CH site, and an indirect effect on the setting of just one (CH008). However, like all greenfield sites, the possibility for unknown subsurface archaeology remains.

The following mitigation measures are already included as part of the design:

1. A suitable buffer zone within which no development shall take place has been applied to the extents of CH008, whose zone of notification abuts the application boundary. This buffer zone will be informed by a geophysical survey and testing. All buffer zones will be maintained during construction, operation and decommissioning of the development. Any person wishing to carry out works within the zone of notification associated with a known or suspected monument to which Section 14 of the National Monuments Act 1930 (as amended) must obtain Ministerial Consent (see Section 3.1.1).

The following mitigation measures are recommended:

2. As part of an advance works programme prior to construction, a combination of advance geophysical survey and advance archaeological test trenching will be carried out by a suitably qualified archaeologist under licence. Results from these archaeological works shall be compiled in a detailed report setting out any findings and outlining any further mitigation measures that should be employed in relation to the proposed development. This report will be submitted to the National Monuments Service (DOHLGH) and the local planning authority archaeologist.

3. All groundworks such as those related to the access tracks, cables, boundary fences, interface connectors, landscaping and temporary compounds shall be monitored by a suitably qualified archaeologist under licence from the National Monuments Service (DOHLGH). Should any archaeological material be encountered, works will cease and the County Archaeologist and National Monuments Service shall be notified. A strategy will be proposed to the local planning authority archaeologist and National Monuments Service to suitably record any archaeological material identified, and preserve any archaeological material in situ, where possible. Where preservation in situ cannot be achieved, either in whole or in part, then a programme of archaeological excavation will be proposed, to ensure the preservation by record of the area of the development that will be directly impacted upon. Further work will then only be carried out following consultations with the local planning authority archaeologist and the National Monuments Service.
4. Suitable screening should be installed along the boundary with CH008 to reduce the visual impact of the development.
5. Results from these archaeological works shall be compiled in a detailed report setting out any findings and outlining any further mitigation measures that should be employed in relation to the proposed development. This report will be submitted to the National Monuments Service (DOHLGH) and the local planning authority archaeologist.

Please note all recommendations are subject to the approval of the National Monuments Service and the local planning authority archaeologist.

1. INTRODUCTION

The purpose of this report is to assess the importance and sensitivity of the known, as well as the potential archaeological, architectural and cultural heritage environment for a Strategic Infrastructure Development (SID) comprising a proposed substation and grid connection situated in the townland of Rathpatrick, Co. Kilkenny. The reports also aims to assess the potential of the proposed development on the known and potential archaeological, architectural and cultural heritage. This study was undertaken for HW Planning on behalf of Terra Solar Ltd by Rubicon Archaeology Ltd.

1.1 Project Background

The proposed development comprises a substation and grid connection. The proposed substation and grid connection is proposed to connect the proposed Drumdowney Solar Farm (Planning Ref. 25/60391) to the National Grid via the existing 110 kV Great Island to Waterford overhead line. The proposed solar farm is the subject of a separate archaeological impact assessment, which forms part of the Drumdowney Solar Farm planning application to Kilkenny County Council (see Hinckley, Pawle, Morgan-James and O'Sullivan 2025). At the time of writing, this application was still pending a decision.

1.2 Site Description and Location

The proposed development is situated *c.* 4 km north-east of Waterford city, in the townland of Rathpatrick. The landscape of the proposed development site is currently agricultural fields under grass, set in a largely rural area with dispersed one-off developments.

The proposed substation is located within an agricultural field, primarily used for tillage. The proposed grid connection will exit the proposed substation and will connect to the existing 110 kV Great Island to Waterford overhead line.

1.3 Study Area

The study area for this assessment has been defined in respect of two factors:

- the ability of sites/information sources to provide information pertaining to the archaeological potential of the proposed development site, and
- the potential physical effects, as well as effects on setting, that the proposed works may have on sites of cultural heritage significance.

Taking these factors into account, the study area has been defined as follows (See Table 1):

Table 1 — Dimensions of the study area

Subject	Study Area
National Monuments and Recorded archaeological monuments (RMPs)	Within 1 km of the proposed development.
Protected Structures and/or their curtilage	Within 1 km of the proposed development.

Subject	Study Area
Architectural Conservation Areas (ACAS)	Within 1 km of the proposed development.
Structures recorded in the NIAH	Within 1 km of the proposed development.
Zones of Archaeological Potential	Within the proposed development footprint
Unregistered features of cultural heritage	Within the proposed development footprint
Areas of archaeological potential; Unregistered Cultural Heritage Receptors (UCH)	Within the proposed development footprint
Previous Excavations and National Museum Topographical Files	Within 1 km of the proposed development.

2. OBJECTIVES AND METHODOLOGY

2.1 Objectives

This study aims to assess the baseline archaeological, architectural and cultural heritage environment, evaluate potential effects that the proposed works will have on this environment, and provide mitigation measures in accordance with the policies of the National Monuments Service, the Department of Housing, Local Government and Heritage (DoHLGH) and Kilkenny County Council, the National Monuments Act 1930–2014, as amended, and best practice guidelines, to avoid, reduce or offset these effects.

Cultural heritage (CH) includes artefacts, monuments, groups of buildings, sites, and museums that have a diversity of values including symbolic, historic, artistic, aesthetic, ethnological or anthropological, scientific and social significance. It includes tangible heritage (movable, immobile and underwater), intangible cultural heritage (ICH) embedded into cultural, and natural heritage artefacts, sites or monuments. The definition excludes ICH related to other cultural domains such as festivals, celebration etc. It includes industrial heritage and cave paintings (UNESCO 2009).

In order to provide a comprehensive assessment, an extensive desktop study in addition to a field inspection of the proposed development area was undertaken.

The scope and methodology for the baseline assessment has been devised with reference to the following guidelines:

- Environmental Protection Agency (2022) *Guidelines on the Information to be Contained in Environmental Impact Statements*
- TII (2022) *Guidelines for Cultural Heritage Impact Assessment of TII National Road and Greenway Projects*
- Department of Arts, Heritage, Gaeltacht and the Islands (DAHGI) (1999) *Frameworks and Principles for the Protection of the Archaeological Heritage*
- Environmental Protection Agency (2003; Draft 2015) *Advice Notes on Current Practice (in the preparation of Environmental Impact Statements)*
- *Guidelines for Planning Authorities and An Bord Pleanála on Carrying out Environmental Impact Assessment* (Department of Housing Local Government and Heritage 2018)
- Department of the Environment, Heritage and Local Government (2011) *Architectural Heritage Protection Guidelines for Planning Authorities*
- Eirgrid (2015) *Cultural Heritage Guidelines for Electricity Transmission Projects. A Standard Approach to Archaeological, Architectural and Cultural Heritage Impact Assessment of High Voltage Transmission Projects*
- National Monument Service (2016) – Solar Farm developments; Internal Guidance Documents
- Chartered Institute for Archaeologists (CIfA 2020) *Standard and Guidance for Commissioning Work or Providing Consultancy Advice on Archaeology and the Historic Environment*

The cultural heritage database (CHD) for this assessment was compiled in part from that of the previous CHD for the proposed Drumdowney Solar Farm (Planning Ref. 25/60391). CH reference numbers have been retained from that CHD to maintain consistency across both reports. Any additional CH sites located within the study area for the cable route have been numbered sequentially from that CHD.

2.2 Desktop Study Methodology

The present assessment of the archaeological, architectural, and cultural heritage of the proposed development area is based on a desktop study of a number of documentary and cartographic sources. The desktop study was further augmented by an examination of aerial photography as well as a field survey. The main sources consulted in completing the desktop study are listed here:

- List of National Monuments in State Care: Ownership & Guardianship
- List of Preservation Orders and the Register of Historic Monuments
- Record of Monuments and Places (RMP)
- Files of the Sites and Monuments Record (SMR)
- Updated SMR available at www.archaelology.ie
- National Inventory of Architectural Heritage (NIAH) Building Survey
- County and Town Development Plans
- Irish Antiquities Division, National Museum of Ireland Topographical Files
- Urban Archaeological Surveys
- Ordnance Survey first and subsequent editions, www.osi.ie
- National Folklore Collection
- Early maps and estate maps
- Aerial photographs
- Excavations Bulletin (www.excavations.ie)
- www.loganim.ie (for townland names

2.3 Field Inspection Methodology

A field inspection of the location of the proposed substation was undertaken by Ivan Pawle of Rubicon Archaeology Limited on the 13th –15th of May 2025 (Plates 1).

The primary purpose of a field inspection is to assess the site in order to identify any potential low-visibility archaeological and/or historical sites or other elements that are not currently recorded, and which may be impacted upon negatively by the proposed development. It is also the purpose of the field inspection to survey any known monuments or sites and to consider the relationship between them and the surrounding landscape, all of which need to be considered during the assessment process.

The methodology used during the field inspection involved recording the present land use as well as the existing topography for the entire area comprising the proposed development site. A photographic record and written description were compiled for any known and/or potential sites of archaeological, architectural and/or cultural significance.

2.4 Methodology Used for Assessing Baseline Value of Sites

In order to categorise the baseline environment in a systemised manner, 'baseline values' have been assigned to each identified site of cultural heritage significance and/or potential within the study area (see Section 1.3). The baseline value of a site is determined with reference to the 'importance' and 'sensitivity' of the site.

The importance of a site is determined based on the following criteria: legal status, condition, historical associations, amenity value, ritual value, specimen value, group value and rarity.

The sensitivity of a site is determined based on the presence of extant remains and/or the potential for associated sub-surface remains of the feature to be present *in situ*.

It should be noted that the National Monuments Act 1930–2014, as amended does not differentiate between recorded archaeological sites on the basis of relative importance or sensitivity. In addition, the Planning and Development Act 2000 (as amended) does not differentiate between Protected Structures or Areas of Architectural Conservation on the basis of relative importance or sensitivity either. Consequently, professional judgement has been exercised to rate these features based on their perceived importance and sensitivity in relation to physical effects and effects on setting.

Taking the above factors into consideration, the criteria that have been defined are provided in Table 2 below.

Table 2 — Baseline values of sites

Subject	Baseline Value
- Recorded Archaeological Monuments - Protected Structures - Architectural Conservation Areas (ACAs)	Very High
- Sites listed in the NIAH that are not Protected Structures - Unregistered built heritage sites that comprise extant remains which are in good condition and/or which are regarded as constituting significant cultural heritage features - Unrecorded features of archaeological potential	High
- Unregistered built heritage sites that comprise extant remains which are in poor condition - Unregistered cultural heritage sites (not including built heritage sites) that comprise extant remains - Townland boundaries that comprise extant remains - Marshy/wetland areas	Medium/High
- Unregistered cultural heritage sites for which there are no extant remains but where there is potential for associated subsurface evidence - Townland boundaries for which there are no extant remains	Medium/Low
- Unregistered cultural heritage sites for which there are no extant remains and where there is little or no potential for associated subsurface evidence	Low

Caution should be exercised when assessing the perceived significance of an archaeological, architectural or cultural heritage site as such categorisation is open to subjectivity. In addition, the perceived levels of importance as identified in this report are liable to future revision in the instance where new information, through the undertaking of further archaeological investigations, is provided.

2.5 Type of Effects

The following table lists the type of effects that a proposed development may have on the cultural heritage resource (after Environmental Protection Agency 2022):

Table 3 - Type of effects

Type of Effects	Definition
Direct	Direct effects arise where an archaeological, architectural and/or cultural heritage feature or site is physically located within the footprint of the proposed development, or its associated physical effect zone, whereby the removal of part, or all of the feature or site is thus required.
Indirect	Indirect effects arise when an archaeological, architectural or cultural heritage feature is not located within the footprint of the proposed development, or its associated physical effect zone, and thus is not affected directly. Such an effect could include an effect on setting or effect on the zone of archaeological potential of site whereby the actual site itself is not physically affected.
Do-nothing effects	The environment as it would be in the future should the subject project not be carried out.
Worst-case Effects	The effects arising from a project in the case where mitigation measures substantially fail.
Cumulative	The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects
Indeterminable	Whereby the full consequence that the proposed development may have on the cultural heritage resource is not known
Irreversible Effects	When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.
Residual	The degree of environmental change that will occur after the proposed mitigation measures have taken effect.
Synergistic Effects	Where the resultant effect is of greater significance than the sum of its constituents

2.6 Methodology Used for Assessing Magnitude of Effects

The methodology used to assess the magnitude of potential pre-mitigation effects, as well as residual effects, of the proposed development on the baseline environment is presented in Table 4 below.

Table 4 — Criteria used for rating magnitude of effects

Effect Magnitude	Criteria
Profound	• An effect which obliterates sensitive characteristics • Applies where mitigation would be unlikely to remove adverse effects. Reserved for adverse, adverse effects only. These effects arise where an archaeology site is completely and irreversibly destroyed. • An effect that obliterates the architectural heritage of a structure or feature of national or international importance. These effects arise where an architectural structure or feature is completely and irreversibly destroyed by the proposed development. Mitigation is unlikely to remove adverse effects.
Very Significant	• An effect which, by its character, magnitude, duration or intensity, significantly alters most of a sensitive aspect of the environment.

Effect Magnitude	Criteria
Significant	• An effect which, by its magnitude, duration or intensity, alters an important aspect of the environment. An effect like this would be where part of a site would be permanently affected, leading to a loss of character, integrity and data about an archaeological feature/site. • An effect that by its magnitude, duration or intensity alters the character and/or the setting of the architectural heritage. These effects arise where an aspect or aspects of the architectural heritage is/are permanently affected leading to a loss of character and integrity in the architectural structure or feature. Appropriate mitigate is likely to reduce the effect. • A beneficial or positive effect that permanently enhances or restores the character and/or setting of a feature of archaeological or cultural heritage significance in a clearly noticeable manner.
Moderate	• An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends. • A medium effect arises where a change to a site/monument is proposed which though noticeable, is not such that the archaeological integrity of the site is compromised, and which is reversible. This arises where an archaeological feature can be incorporated into a modern-day development without damage and that all procedures used to facilitate this are reversible. • A medium effect to a site/monument may also arise when a site is fully or partly excavated under license and all recovered data is preserved by record. • An effect that results in a change to the architectural heritage which, although noticeable is not such that alters the integrity of the heritage. The change is likely to be consistent with existing and emerging trends. Effects are probably reversible and may be of relatively short duration. Appropriate mitigation is very likely to reduce the effect. • A beneficial or positive effect that results in partial or temporary enhancement of the character and/or setting of a feature of archaeological or cultural heritage significance in a clearly noticeable manner.

Effect Magnitude	Criteria
Slight	• An effect which causes noticeable changes in the character of the environment without affecting its sensitivities • An effect which causes changes in the character of the environment, such as visual effect, which are not high or very high and do not directly affect or affect an archaeological feature or monument. • An effect that causes some minor change in the character of architectural heritage of local or regional importance without affecting its integrity or sensitivities. Although noticeable, the effects do not directly affect the architectural structure or feature. Effects are reversible and of relatively short duration. Appropriate mitigation will reduce the effect. • A beneficial or positive effect that causes some minor or temporary enhancement of the character of an architectural heritage significance which, although positive, is unlikely to be readily noticeable.
Not significant	• An effect which causes noticeable changes in the character of the environment but without significant consequences.
Imperceptible	• An effect on archaeological features or monument capable of measurement but without significant consequences. • An effect on architectural heritage of local importance that is capable of measure merit but without noticeable consequences. • A beneficial or positive effect on architectural heritage of local importance that is capable of measurement but without noticeable consequences.

Positive significance level of a construction or operation effect on a feature may also be expressed.

- **Significant positive**: a beneficial effect that permanently enhances or restores the character and/or setting of the architectural heritage in a clearly noticeable manner.
- **Moderate positive:** a beneficial effect that results in partial or temporary enhancement of the character and/ or setting of the architectural heritage and which is noticeable and consistent with existing and emerging trends.
- **Slight positive:** a beneficial effect that causes some minor or temporary enhancement of the character of architectural heritage or local or regional importance which, although positive, is unlikely to be readily noticeable; and
- **Imperceptible positive:** a beneficial effect on architectural heritage of local importance that is capable of measurement but without noticeable consequences.

2.7 Assessing the Duration and Frequency of Effect

'Duration' is a concept that can have different meanings for different topics. The EPA (2022) has issued the below guideline definitions when discussing duration in the context of environmental impact assessment.

Table 5 — Duration and frequency of effect

Term	Criteria
Momentary Effects	Effects lasting from seconds to minutes

Term	Criteria
Brief Effects	Effects lasting less than a day
Temporary Effects	Effects lasting less than a year
Short-term Effects	Effects lasting 1–7 years
Medium-term Effects	Effects lasting 7–15 years.
Long-term Effects	Effects lasting 15–60 years.
Permanent Effects	Effects lasting over 60 years.
Reversible Effects	Effects that can be undone, for example through remediation
Frequency of Effects	Describe how often the effect will occur (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually).

2.8 Methodology Used for Assessing Significance Level of Effects

The significance level of a construction or operation effect on a feature is assessed by combining the magnitude of the effect and baseline value of the feature. The matrix in Table 6 provides a guide to decision-making but is not a substitute for professional judgement and interpretation, particularly where the baseline value or effect magnitude levels are not clear or are borderline between categories. The permanence of the effects is also taken into account, with irreversible effects being more significant while temporary or reversible changes are likely to be less significant.

Table 6 — Criteria for assessing significance level of effects

Magnitude of Effect	Baseline Value				
	Very High	**High**	**Medium/High**	**Medium/Low**	**Low**
Profound	Very significant	Very significant	Significant	Moderate	Slight
Very Significant	Significant	Significant	Moderate	Slight	Slight
Significant	Significant	Moderate	Moderate	Slight	Slight
Moderate	Moderate	Moderate	Slight	Slight	Negligible
Slight	Moderate	Slight	Slight	Negligible	Negligible
Not Significant	Slight	Slight	Imperceptible	Imperceptible	Imperceptible
Imperceptible	Imperceptible	Imperceptible	Imperceptible	Imperceptible	Imperceptible

2.9 Assessing Effects on Setting

The definition of setting follows the guidance set by Historic England as they have developed a range of comprehensive guidance on this subject specific to heritage assets (Historic England; 2008; 2017). Hence setting is not simply the visual envelope of the asset in question. Rather, it is those parts of the asset's surroundings that are relevant to the significance of the asset and the appreciation thereof, and in which a heritage asset is experienced.

In most instances setting will relate to the historical value of the asset, where an appreciable relationship between the asset and an element of its surroundings helps the visitor understand and appreciate the asset. This may be in terms of a physical relationship, such as between a castle and the natural rise that it occupies, or a more distant visual relationship, such as a designed vista or the view from, for example, one ringfort to another. The former is referred to as immediate setting and the latter as landscape

setting. Many assets will only have an immediate setting. Some assets will have aesthetic value that relates to the surrounding landscape, such as in the case of a designed view incorporating a distant hill, or that relates to the contribution the asset makes to the local landscape, for example a church spire providing a focal point in a view down a valley.

Historic England has provided a list of factors to be considered when assessing effects upon setting. These are broad factors and have been taken into consideration when assessing magnitude of effect and sensitivity. They are summarised in Table 7.

Table 7 — Factors to be considered when assessing effects upon setting (after Historic England 2017)

Factor	Discussion
Visual dominance	Where an historic feature (such as a hilltop monument or fortification, a church spire, or a plantation belonging to a designed landscape) is the most visually dominant feature in the surrounding landscape, adjacent construction of the proposed development may be inappropriate.
Scale	The extent of a proposed development and the number, density and disposition of its associated elements will also contribute to its visual effect.
Intervisibility	Certain archaeological or historic landscape features were intended to be seen from other historic sites. Construction of a proposed development should respect this intervisibility.
Vistas and sightlines	Designed landscapes invariably involve key vistas, prospects, panoramas and sightlines, or the use of topography to add drama. Location of a proposed development within key views, which may often extend beyond any designated area, should be avoided.
Movement, sound or light effects	The movement associated with a proposed development may be a significant issue in certain historic settings. Adequate distance should always be provided between important historic sites and proposed developments to avoid the site being overshadowed or affected by noise.
Unaltered settings	The setting of some historic sites may be little changed from the period when the site was first constructed, used or abandoned. Largely unaltered settings for certain types of sites, particularly more ancient sites, may be rare survivals and especially vulnerable to modern intrusions such as wind turbines. This may be a particular issue in certain upland areas.

The following are guides to the assessment of magnitude of effect on setting:

- Obstruction of or distraction from key views. Some assets have been sited or designed with specific views in mind, such as the view from a country house with designed vistas. The obstruction or cluttering of such views would reduce the extent to which the asset could be understood and appreciated by the visitor. Developments outside key views may distract from them and make them difficult to appreciate on account of their prominence and movement. In such instances the magnitude is likely to be greatest where views have a particular focus or a strong aesthetic character. Sympathetic development may improve key views by removing features that obstruct or distract from key views and hence preserve or enhance the importance of the asset.
- Changes in prominence. Some assets are deliberately placed in prominent locations in order to be prominent in the surrounding landscape, for example prehistoric cairns are often placed to be silhouetted against the sky and churches in some areas are deliberately placed on ridges in

order to be highly visible. Developments can reduce such prominence and therefore reduce the extent to which such sites can be appreciated or the contribution that they make to the local landscape. Similarly, sympathetic development can enhance the setting of such sites by, for example, removing modern forestry that would otherwise compromise the setting of a cairn that had been placed on a skyline.

- Changes in landscape character. A particular land use regime may be essential to the appreciation of an asset's function, for instance the fields surrounding an Improvement period farmstead are inextricably linked to its appreciation. Changes in land use can leave the asset isolated and reduce its value. In some instances, assets will have aesthetic value or a sense of place that is tied to the surrounding landscape character. Conversely, sympathetic development may restore or preserve the relevant land use and hence preserve or enhance the relevant value of the asset.
- Duration of effect. Effects that are long term or permanent are generally of greater magnitude than those that are short term.

Readily reversible effects are generally of lesser magnitude than those that cannot be reversed. Effects upon the defined setting will be of greater magnitude than those that affect unrelated elements of the asset's surroundings or incidental views to or from an asset that are unrelated to the appreciation of its value. The magnitude of effects can be rated from Negligible to Major using a similar scale to that for physical effects.

2.10 Legislation, Planning Policy and Guidance

A review of the applicable legislation, as well as national, strategic and local planning policies and guidance was undertaken as part of this study. The relevant sections addressing archaeological, architectural and cultural heritage in the Kilkenny County Development Plan (2021–2027) are included in Appendix 5. Any mitigation measures proposed in Section 5 take account of the current legislation, policies and guidelines so as to avoid, reduce or offset effects on the archaeological, architectural and cultural heritage environment, in line with the aforementioned legislation, local planning policies and guidance.

2.11 Limitations of this Assessment

There were no difficulties or limitations encountered during the compilation of this report.

3. BASELINE/RECEIVING ENVIRONMENT

3.1 Designated Archaeological Sites

3.1.1 Known or Suspected Monuments (The SMR and RMP)

A Sites and Monuments Record (SMR) was issued for all counties in the State between 1984 and 1992 and is continually updated and supplemented as additional monuments are discovered. The SMR is an inventory containing a numbered list of known or suspected monuments originally accompanied by 6-inch Ordnance Survey maps (at a reduced scale). The SMR formed the basis for issuing the Record of Monuments and Places (RMP) - the statutory list of recorded monuments established under Section 12 of the National Monuments (Amendment) Act 1994. Under this Act, each site recorded in the RMP is granted statutory protection. When the owner or occupier of a property, or any other person, proposes to carry out, or to cause, or to permit the carrying out of any work at or in relation to a recorded archaeological monument, they are required to give notice in writing to the Minister for Housing, Local Government and Heritage two months before commencing that work.

There are 11 known or suspected monuments located within the study areas (see Section 1.3) for the proposed substation and grid connection (see 1.3; Table 8).

There are no monuments located within the boundary of the proposed development site. The proposed site boundary abuts the zone of notification associated with CH008. However, there is no development proposed at this location within the boundary.

The zones do not define the exact extent of the monuments but rather are intended to identify them for the purposes of notification under Section 12 of the National Monuments Act (1930-2004): each is referred to as a "zone of notification". If it is intended to carry out works within a zone of notification, two months prior notice in writing must be provided to the Minister for Minister for Housing, Local Government and Heritage, even if planning permission is not needed for the works. Works undertaken through the planning process is via a formal notification mechanism and acts as notification in accordance with Section 12 of the National Monuments Act.

Table 8 — Known or Suspected Monuments within the study area

CH ID	Monument No.	RMP	Short Description	Townland
CH004	KK044-014004-	Yes	Headstone	Rathpatrick (Ida By.)
CH005	KK044-014003-	Yes	Graveslab	Rathpatrick (Ida By.)
CH007	KK044-014001-	No	Church	Rathpatrick (Ida By.)
CH008	KK044-013----	Yes	Ringfort - rath	Rathpatrick (Ida By.)
CH009	KK043-060----	Yes	Standing stone	Kilmurry (Ida By.)
CH091	KK043-036----	Yes	Cist	Kilmurry (Ida By.)
CH092	KK043-082----	No	Fulacht fia	Kilmurry (Ida By.)
CH093	KK044-023----	No	Fulacht fia	Luffany (Ida By.)
CH094	KK044-022----	Yes	Cross - Wayside cross	Luffany (Ida By.), Rathpatrick (Ida By.)
CH095	KK044-024----	No	Fulacht fia	Rathpatrick (Ida By.)
CH140	KK043-021----	No	kiln	Great Island

3.1.2 National Monuments

National Monuments are broken into two categories: National Monuments in the ownership or guardianship of the state and National Monuments in the ownership or guardianship of a local authority. Section 8 of the National Monuments (Amendment) Act 1954 provides for the publication of a list of monuments, the preservation, of which, are considered to be of national importance. Two months' notice must be given to the Minister for Housing, Local Government and Heritage where work is proposed to be carried out at or in relation to any National Monument.

There are no National Monuments sites incorporated by the study area (see Section 1.3).

3.1.3 Sites with Preservation Orders

The National Monuments Act 1930–2014 as amended provide for the making of Preservation Orders and Temporary Preservation Orders in respect of National Monuments. Under Section 8 of the National Monument Act 1930 (as amended) the Minister for Housing, Local Government and Heritage, can place a Preservation Order on a monument if, in the Ministers' opinion, it is a National Monument in danger of being or is actually being destroyed, injured or removed or is falling into decay through neglect. The Preservation Order ensures that the monument shall be safeguarded from destruction, alteration, injury, or removal, by any person or persons without the written consent of the Minister.

There are no sites with preservation orders incorporated by the study area (see Section 1.3)

3.1.4 National Museum of Ireland Topographical Finds

The National Museum of Ireland Topographical finds database was consulted to see if there was a record of an archaeological object within the study area. The database is a representation of the distribution of archaeological objects at a local and national level, based on the Irish Antiquities Division's Collections Database. Section 2 of the 1930 National Monuments Act (amended) defines an archaeological object as (in summary) any chattel in a manufactured or partly manufactured state or an unmanufactured state but with an archaeological or historical association. This includes ancient human, animal or plant remains. The database produced no results for the study area (see Section 1.3)

3.2 Designated Architectural Heritage Sites

In 1997 Ireland ratified the Granada Convention on architectural heritage. This provided the basis for a national commitment to the protection of the architectural heritage throughout the country. The Local Government (Planning and Development) Act 2000, and the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999, made the legislative changes necessary to provide for a strengthening of the protection of architectural heritage.

3.2.1 Record of Protected Structures

The Kilkenny County Development Plan (2021–2027) was consulted for schedules of Protected Structures. These are buildings that a planning authority considers to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social, and/or technical point of view. Protected Structures receive statutory protection from injury or demolition under Section 57 (1) of the Local Government (Planning and Development) Act 2000. Protected structure status does not exclude development or alteration but requires the developer to consult with the relevant planning authority to ensure that elements which make the structure significant are not lost during development.

There is one Protected Structure located within the study area (see Section 1.3), which is also listed on the NIAH register (see Table 9). The site, CH207, is located *c*. 611 m south-west of the proposed development.

Table 9 — Protected Structures located within the study area

CH ID	Type	RPS No;	Short Description	Townland
CH207	RPS	RPS No. C288	Catholic Church of the Assumption, KILMURRY, Slieveroe, KILKENNY	KILMURRY

3.2.2 Architectural Conservation Areas

The Kilkenny County Development Plan (2021–2027) was consulted for records relating to Architectural Conservation Areas (hereinafter 'ACAs'). The stated objective of ACAs is to conserve and enhance the special character of the area, including traditional building stock and material finishes, spaces, streetscapes, landscape and setting.

There are no ACAs within the study area (see Section 1.3).

3.2.3 National Inventory of Architectural Heritage (NIAH)

The National Inventory of Architectural Heritage (hereinafter the 'NIAH') is a state initiative under the administration of the DoHLGH and was established on a statutory basis under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999. Its purpose is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage. NIAH surveys provide the basis for the recommendations of the Minister for Housing. Local Government and Heritage to the planning authorities for the inclusion of particular structures in their Record of Protected Structures (RPS).

There is one NIAH site located within the study area (see Section 1.3), which is also a Protected Structure (see Table 10). The site, CH207, is located *c*. 611 m south-west of the proposed development.

Table 10 — NIAH registrations located within the study area

CH ID	Type	Reg No;	Short Description	Townland
CH207	NIAH	Reg No. 12404321	Catholic Church of the Assumption, Kilmurry, Slieveroe, Kilkenny	Kilmurry

3.3 Undesignated Cultural Heritage Sites within the Proposed Development Site

This section deals with sites that are considered to be of cultural heritage value, but which do not fall within the above categories as they are not registered. Such sites may include limekilns, dwellings/outhouses, trackways or townland boundaries etc. identifiable on the First Edition 6/25-inch OS maps and/or noted during the field visit.

3.3.1 Sites identifiable on cartographic sources

The cartographic record for the study area was examined for the purposes of this report (Figures 3, 4 and 5). The First Edition 6-inch Ordnance Survey Sheet (1840), First Edition 25-inch Survey (1907) and

the First Edition 6-inch Cassini Survey (*c.* 1908–1942) were consulted to identify undesignated cultural heritage sites that may be impacted on by the proposed scheme. The maps show that there were changes to the field system between the 6-inch map and 25-inch map, with fields being subdivided. For example, the two fields located at the east end of the grid connection are shown as four adjoining fields on the 6-inch OS map. By the time of the 25-inch OS map, this has reduced to two adjoining fields.

There are no undesignated cultural heritage sites located within the application boundary of the proposed substation and grid connection (see Section 1.3).

3.3.2 Townland boundaries

A townland is the smallest official land unit in the country. Ireland is made up of approximately 60,000 townlands. As a result, townland boundaries are ubiquitous in the Irish countryside and have been incorporated into the modern agricultural landscape. Many townlands predate the arrival of the Anglo-Normans, and Irish historical documents consistently use townland names throughout the historic period to describe areas and locate events accurately in their geographical context. This suggests that many the boundaries of many of these territorial units preserve landscape divisions from the medieval period and perhaps earlier. The townland names and boundaries were standardised in the 19th century when the Ordnance Survey began to produce large-scale maps of the country. Research into the name of these land units frequently provides information relating to its archaeology, history, folklore, ownership, topography or land use.

The First Edition 6-inch Ordnance Survey was consulted in order to identify the location of townland boundaries that may be affected on by the proposed scheme. The proposed development does not overlie or cross any townland boundaries.

3.3.3 Sites identifiable on aerial photography and satellite imagery

Ortho-rectified aerial photography available from the Ordnance Survey of Ireland was inspected in order to identify possible features of cultural and heritage significance. Aerial photography from the 1995, 2000, and 2005 fly-overs was inspected, as well as the latest Tailte Éireann images, LiDAR imagery (where available), Google Earth and Bing Maps satellite imagery.

No additional undesignated cultural heritage sites were identified on other aerial photography and satellite imagery within the proposed development site.

3.3.4 Sites identified during field inspection

The location of proposed substation was inspected by Ivan Pawle of Rubicon Archaeology Limited on the 13th –15th of May 2025 (Plate 1).

No additional sites or features of Archaeological, Architectural and Cultural Heritage significance were identified.

3.3.5 Areas of Archaeological Potential

Areas of archaeological potential (AAPs) are additional areas or locations whose landscape characteristics suggest a higher potential for unknown archaeological features to be present e.g. riverine, estuarian or peatland environments. There were no areas of archaeological potential identified based on landscape characteristics (see Section 1.3).

3.4 Archaeological and Historical Background

3.4.1 Prehistoric period

There is abundant evidence for prehistoric settlement in Co. Kilkenny and there are several sites within the study area that may date to this period. These amount to four *fulachtaí fia* and which may be Bronze Age in date.

Fulachtaí fia survive as low mounds, usually horseshoe shaped, of charcoal-enriched soil packed with fragments of heat-shattered stones (termed 'burnt mound'); when levelled, they are often noticeable as black spreads in ploughed fields. They were usually situated close to a water source, like a stream, or in wet marshy areas. It is generally accepted that they were probably used as cooking places (Ó Drisceóil 1988). Water was boiled in a regular pit (lined with wooden planks or stone slabs to form a trough) by the addition of hot stones from a fire close by. O'Kelly (1954, 105–55) showed by experiment that the large quantities of water can be boiled in this way in about twenty minutes. He also demonstrated that meat, wrapped in straw and immersed in the boiling water, cooked at a rate of twenty minutes per pound weight. When the cooking was over the remnants of heat-shattered stones in the trough were discarded to one side. Eventually, after many cookings, these would form a mound curving round three sides of the trough, hence the horse-shape mound (Power et al. 1997, 75). It is not certain whether *fulachtaí fia* were elements temporary hunting camps or of permanent settlements. The majority of radiocarbon dates place these monuments in the Bronze Age (Brindley and Lanting 1990, 55–6. They are the most numerous prehistoric sites in Ireland, with over 4,500 known examples (Power 1990, 13–17).

A review of the use of the term '*fulacht*' in early Irish literature and of references to 'activities that may have taken place at such sites', suggest associations with 'the cooking and eating of food, washing and bathing, music and sex' (Ó Drisceóil 1990, 157– 64). The word '*fulacht*' means a pit used for cooking. The second element can be interpreted as either '*fiadh*' meaning 'of the deer' or 'of the wild' or '*fian*' meaning 'of a roving band of hunters or warriors' or 'of Fianna or Fionn Mac Cumhail' (Ó Drisceóil 1988, 671–80).

There is a lack of archaeological evidence of human activity in the Iron Age compared to the Bronze Age, Medieval, and Post-Medieval in the study region, which is common throughout Ireland. There are numerous examples of ringforts within the study area, which are commonly known as early medieval monuments, however, there are few examples of some with Iron Age dates. There is one example within the study area.

3.4.2 Medieval period (AD 400–1540)

The early medieval period (AD 400 – c. 1169) was a time of rapid expansion of agriculture. Throughout this period Ireland was a predominantly rural society characterised by dispersed settlement. The economy was based on mixed agriculture though the rearing of cattle was seen as very important. Ringforts and enclosures are indicative of settlement at this time.

Ringforts are undoubtedly the most widespread and characteristic archaeological field monument in the Irish countryside. There is one known ringfort with the study area, (CH008) located adjacent to the proposed development site. They are usually known by the names *ráth* or *lios*, forming some of the most common placename elements in the countryside. The ringfort is basically a circular or roughly circular area enclosed by an earthen bank formed of material thrown up from concentric fosse (ditch) on its outside. Generally, the diameter of the enclosure is between 25 m and 50 m. A single bank and

fosse (univallate) is the most usual form; double rings (bivallate) or triple rings (trivallate) are rarer. The number of rings of defence are thought to reflect on the status of the site, rather than the strengthening of its defences. These sites have endured centuries of erosion, reuse and sometimes deliberate destruction and it is not always possible to distinguish original features; the overgrown nature of many sites compound the problem of field recording. However, entrances may be detected where a clear break in the bank is in line with an uncut causeway over the fosse. Souterrains are often found in association with ringforts (Power 1992, 131).

Archaeological excavation has shown that the majority of ringforts were enclosed farmsteads, built in the early medieval period. Though not forts in the military sense, the earthworks acted as a defence against natural predators like wolves, as well as human predators. Local warfare and cattle raiding were commonplace at this time. The construction of so many throughout the country, in a relatively short period (400–500 years), reflects on the stability and wealth of society at the time, and also its homogeneity. As well as farming-related activities like corn-grinding and animal husbandry, the ringfort was home to a wide variety of craft industries, including spinning, weaving, metal- and glass-working. A limekiln was also record in association with ringfort. Dwellings and outhouses were built on timber posts, with walls of wattle, mud or sods, which usually leave no trace above ground today. Excavation can trace the remains of these structures by revealing features like post-holes, stake-holes and sunken hearths. The favoured locations for ringforts are on the shoulder of ridges or at breaks of slopes. Many have level interiors created by scarping-up on the downslope and cutting into the upslope. The enclosing element can change dramatically from a downslope scarped edge to a well-defined bank and fosse on the upslope. Thus sited, they are often overlooked close-in on one side but otherwise command an extensive view (Power 1992, 131).

3.4.3 Post-medieval (AD 1540–1700) and early modern period (AD 1700–1850)

The post-medieval period is represented by an early 19th century church (CH207), which would have served the largely rural, farming population inhabiting the area during the post medieval period. The church, which is still in use today, represents a fine example of later ecclesiastical architecture, the quality of which indicates the importance of religious worship in post-medieval rural communities.

3.5 Toponomy of Townland/s

The Irish landscape is divided into approximately 60,000 townlands and the system of landholding is unique in Western Europe for its scale and antiquity. Many townlands predate the arrival of the Anglo-Normans, and Irish historical documents consistently use townland names throughout the historic period to describe areas and locate events accurately in their geographical context. The townland names and boundaries were standardised in the 19th century when the Ordnance Survey began to produce large-scale maps of the country. The original Irish names were eventually anglicised to varying degrees, depending in part upon the linguistic skills of the surveyors and recorders. A study of the townland names can provide information on aspects of cultural heritage including descriptions of the use of the landscape by man and the potential presence of archaeological or cultural heritage sites or features.

There is one townland within the study area (see Section 1.3; Table 11).

Table 11 — Townland placename evidence (after Irish Placenames Committee 2013)

English Name	Irish Name	Glossary
Rathpatrick	Ráth Phádraig	Patrick's ring-fort

3.6 Intangible Heritage/Irish Folklore Commission

Cultural Heritage is a broad term that includes Archaeological Heritage, Built Heritage, Portable Heritage, and other resources inherited from the past by contemporary society. It consists of the tangible and intangible traces of the interactions between people and places, people and nature and people and objects through time (TII 2022, 8). Folklore and local tradition are examples of intangible interactions between people and places where they live. In Ireland, work was done by the Irish Folklore Commission, and its successors, to collect and preserve Irish folklore. The Schools' Collection, for example, collected folklore and local traditions from pupils of 5,000 primary schools (Dúchas 2025).

Though are no specific references to particular monuments within the study areas contained within the School's Collection, there are many stories about ringforts generally which give insight into the folklore surrounding them and the relationship that the people of the local area had with these monuments.

3.7 Recent Excavations

The Excavations Bulletin is an annual account of all excavations carried out under license. The database is available online at www.excavations.ie and includes excavations from 1970 onwards. This database was consulted as part of the desktop research for this report to establish if any archaeological investigations had been carried out within the study area (see Section 1.3). The database produced five results for archaeological excavations undertaken within the study area (Appendix 6). Archaeological features uncovered by excavations include burnt mounds, pits and cultivation ridges, offering evidence of human settlement in the area as early as the Bronze Age period.

3.8 Topography and Soils

According to the Teagasc Soil Information System (http://gis.teagasc.ie/soils/index.php) the main soil association is Clashmore, which is a coarse loamy drift with siliceous stones. The main bedrock is Sandstone and conglomerate and siltsone as well slate and schist (Geology Survey Ireland 2025).

4. IMPACT STATEMENT

4.1 Development Description

The proposed development comprises a substation and grid connection located in the townland of Rathpatrick, which forms part of the proposed Drumdowney Solar Farm (Planning Ref. 2560391), Co. Kilkenny. The proposed substation will be a 110 kV Insulated Switchgear (GIS) substation with the associated grid connection comprising underground cabling which will connect to the existing 110 kV Great Island to Waterford overhead line via 2 no. overhead interface towers.

General

The proposed development comprises of

1) A 110kV Gas Insulated Switchgear (GIS) electricity substation with two-storey GIS substation building, single-storey Independent Power Producer (IPP) control room building, High Voltage (HV) electrical equipment and associated infrastructure (to include transformer, lightning protection masts, back-up diesel generator, fire/blast wall, telecoms pole, perimeter security fencing, security lighting, water and drainage infrastructure, and temporary construction compound) to connect to and serve solar farm development;

2) Associated loop-in / loop out grid connection infrastructure to connect into an existing 110kV overhead transmission line (including underground 110kV cabling, 2 No. new interface towers and decommissioning of ca. 15m of existing 110kV overhead line);

3) Construction and operational access from the public road L34142;

4) All ancillary site development, landscaping and earthworks. The development subject to this application forms part of grid connection and access arrangements which will facilitate the connection of the proposed Drumdowney Solar Farm (Kilkenny County Council Reference 25/60391) to the national grid.

The operational lifetime of the solar farms is assumed to be 40 years. However, following the decommissioning of the solar farm, it is envisaged that the substation (and underground cable grid connection) will remain in situ as a valuable functioning and operational part of the electricity transmission network managed by the Transmission Systems Operator, EirGrid.

Substation

The substation will be based on EirGrid design specifications The substation will consist of the EirGrid and Independent Power Producers (IPP) control room buildings, a transformer, security fencing, security lighting, drainage infrastructure, temporary construction compound and high voltage electrical equipment. The installation of HV electrical equipment will include a transformer with associated equipment along with:

- Lightning Masts (LM);
- Back-Up Diesel Generator;
- Harmonic filters if required by EirGrid;
- Capacitor Bank if required by EirGrid;
- Fire/Blast Wall;

- Telecoms Pole.

The substation compound has a total area of 5,335m^2. Earthworks will be undertaken so the compound is level, with a finish compound level of 91.65m.

Site Access

The site will be accessed for both the construction and operational phases by means of a single entrance from the L34142. This existing entrance will be subject to some upgrades, including removal of existing roadside sod and stone ditch to provide new gate as presented under Kilkenny County Council Reference 25/60391. The entrance will be suitably splayed and has been subject to sight line and autotrack analysis, with the latter including modelling of abnormal load delivery for the transformer. Operational sightlines will be maintained by trimming back hedgerows with all necessary land within ownership.

A 4.5 metre wide compacted access track will extend from the entrance to the substation compound. The design includes a temporary construction track to cater for deliveries, which will be decommissioned post the construction phase (and land reinstated), as well as an operational access track. The track will include a geotextile base and filter membrane and 200 mm of Clause 804 sub-base.

Connection to National Grid

In order to connect to the transmission network, it is proposed to connect the 110kV substation into the national grid via a 'loop-in / loop-out' underground 110kV cable grid connection which will connect into the existing 110kV Great Island to Waterford overhead line.

Two new steel lattice interface towers of approximately 16 m in height will form part of the existing overhead line and both towers will connect to the proposed 110kV substation via underground 110kV cables. The interface towers are approximately 15 metres apart, therefore the same length of the existing 110kV Whitegate – Cow's Cross overhead line will need to be decommissioned. The underground cable is comprised of 3 no. power ducts, 2 no. telecom ducts and 1 no. earth continuity duct. The cables to each interface tower are 68 and 83 metres in length.

This connection method will constitute a new node of the transmission network, connecting the proposed substation and associated solar farm generation to the national electricity grid. The construction method for the interface towers and decommissioning of 110kV overhead lines is set out in the Drumdowney Substation & Grid Connection Construction Methodology prepared by Drumdowney Solar Farm Limited.

All works will be carried out in accordance with international best practice and full compliance with health and safety requirements.

Temporary Construction Compound

As outlined in the submitted site layout plans, it is proposed to provide a temporary construction compound west of the proposed substation, accessed from the entrance from the L34142. The temporary compound will include the following facilities at a minimum:

- Adequate canteen space to allow for all workers during the peak period;

- Office space with lighting, heating and internet facilities;
- Toilets and adequate welfare facilities for construction staff in accordance with the relevant statutory Health & Welfare guidelines;
- Parking space for both light and heavy vehicles;
- Designated skips and temporary storage areas.

Surface Water Drainage and Water Services

Surface water drainage proposals for the development have been developed to mimic the natural drainage patterns of the site and thereby be in accordance with the best management practices of Sustainable Drainage Systems (SuDS) including those set out in the SuDS Manual (C753) published by CIRIA in 2015. Specifically, this includes the following:

- The compound construction is formed with permeable stone thus mimicking a soakaway scenario. ESB compound stone is single sized for the first 150mm for safety purposes. It then changes to a graded 6F2 material.
- The main areas to be drained includes the roofs and the compound road. These equate to approximately 2359m². The compound road will be drained via series of road gullies.
- Assuming even the most basic of infiltration rates down through the permeable compound stone, the existing greenfield situation is easily maintained.

The surface water generated in the hardstanding and bunded areas will discharge to the soakaway via a Class 1 Full Retention Oil Separator. The electrical transformer in the substation is oil filled equipment and, as such, is protected with impermeable bunds. Surface water generated in this bund will be pumped out by an oil sensitive pump ensuring that only non-contaminated water enters the site drainage network.

In relation to wastewater, a 5m3 foul holding tank is proposed as part of the operational development. These tanks are normally used in ESB substations. It will be emptied periodically, with the capacity in excess of modelled holding requirements.

It is proposed to provide the required potable water demand of the station with a bored well on site. The potable water demand within the site will be low as the proposed station is to be unmanned. To avoid issues like stagnation in the water supply line and problems resulting from this, there will be a continual water demand of 24 litres per week from automatically flushing WCs within the station.

Site Restoration and Landscaping

This will involve the reinstatement of all other excavated materials and associated landscaping works. It will include the replacement of topsoil in disturbed ground areas such as access tracks and the removal of the construction compound and other temporary work areas.

The proposed landscaping provides for the removal of c.87 metres of hedgerow to facilitate the proposed development. Approximately 531 metres of existing hedgerow will be bolstered (Type 1) as part of the development, with an additional 287 linear metres of new hedgerow planting (Type 2) as per the submitted Landscape Mitigation Plan.

Other Planned Works

Kilkenny County Council Reference 25/60391

It is intended that the proposed 110kV substation and grid connection will service the Drumdowney Solar Farm, which is currently the subject of a planning application to Kilkenny County Council. At the time of writing, the solar farm application is undetermined.

The proposed solar farm will consist of solar panels on ground mounted frames, 27 no. single storey electrical inverter/transformer stations, 5 no. single storey spare parts containers, 3 no. Ring Main Units, 5 no. weather stations, underground electrical ducting and cabling within the development site, private lands and within the L3429, L7523, L7563, L7469, L3407, L3414, L34144, L7466, L3406, L7483, L3415, N25 and N29 public roads to connect solar farm field parcels, security fencing, CCTV, access tracks, 7 no. watercourse/drain deck crossings and 4 no. horizontal directional drill crossings (under the N25 and N29 public roads and the Luffany River), temporary construction compounds, landscaping and all associated ancillary development and drainage works. Construction and operational access will be via 7 no. existing entrances from the L3429, L7469, L7466, L4783 and L34142 which will be subject to entrance upgrade works. Separate construction phase access options are proposed for Parcel 4 via Port of Waterford and the L4783. The operational lifespan of the solar farm will be 40 years.

The solar farm will contribute directly to a carbon dioxide emission reduction of 41,647tonnes per annum or the equivalent of approximately 1,665,917 tonnes of CO2 over the 40 year lifetime of the project.

4.2 Summary Baseline Environment Summary

The proposed development site has identified 19 sites of archaeological, and/or cultural heritage significance within the defined study areas (see Section 1.3; Table 12).

Table 12 — Summary of baseline environment

Site Type	Summary
- RMPs - SMRs - National Monuments - Sites with Preservation Orders - Sites listed in the Register of Historic Monuments	There are 11 known or suspected monuments located within the study area.
- Protected Structures	There is one Protected Structure (CH207) located within the study area, which is also an NIAH registration.
- Architectural Conservation Areas (ACAs)	There are no ACAs incorporated by the study area.
- Sites Listed in the NIAH	There is one NIAH registration (CH207) within the study area, which is also listed in the RPS.

Site Type	Summary
- Unregistered Cultural Heritage Sites	There are no undesignated heritage sites within the development area, and the development does not cross any townland boundaries.
- Areas/features of archaeological potential	There are no additional areas of archaeological potential within the proposed development.
- Previous Archaeological excavation - National Museum of Ireland Topographical Finds	There were five previous excavations found within the study area.

4.3 Impact Assessment

This section assesses the likely significant impacts that the proposed development will have on the baseline/receiving environment, prior to the implementation of any mitigation measures. The methodology used in ascertaining the baseline value of sites, the type, magnitude and significance level of impacts is set out in Section 2 above.

Mitigation measures to avoid, reduce or offset these impacts and the residual impact that the project will have on each site of cultural heritage significance and/or potential are provided in Sections 5 and 6 below.

4.3.1 Direct effects

Proposed Substation and Grid Connection

The proposed substation will be a 110 kV Insulated Switchgear (GIS) substation with the associated grid connection comprising underground cabling which will connect to the existing 110 kV Great Island to Waterford overhead line via two interface towers located in the substation compound. The substation compound consists of a two storey GIS substation building, IPP Control Room building, High Voltage (HV) electrical equipment and associated infrastructure including palisade fences and concrete post and rail fences.

The substation will be linked to the proposed Drumdowney Solar Farm (Planning Ref. 25/60391) via an underground grid connection. The internal underground cable route of the solar farm, to which the substation will link, is the subject of a separate archaeological impact assessment (Hinckley, Pawle, Morgan-James and O'Sullivan 2025). The portion of the underground grid connection which links the substation to the solar farm is not predicted to have any direct effect on any known CH sites.

Two new steel lattice interface towers of approximately 16 m in height will form part of the existing overhead line and both towers will connect to the proposed 110kV substation via underground 110kV cables. The installation of the interface towers and grid connection is not anticipated to have any direct effect on any known CH site.

There are no CH sites located within the proposed substation and grid connection site, and as such no direct effect on any CH site is predicted.

4.3.2 Indirect effects

Proposed Substation and grid connection

The proposed development boundary abuts the zone of notification associated with CH008, a ringfort, the centre of which is c. 60 m from the northern boundary of the compound. Based on aerial imagery and existing field boundaries, the ringfort has an approximate diameter of 50 m, placing it as close as 10 m to the boundary of the development. As there is no development proposed at this location within the boundary, it will have no effect on the zone of notification. However, the buildings and fencing, as well as interface towers associated with the substation will have a long-term, indirect effect on the setting of the monument.

Table 13 — Summary of effect and effect magnitude prior to mitigation

CH No.	Category	Summary	Baseline Value	Effect Type	Description of Effect	Effect Magnitude	Significance of Effect
CH008	RMP	Ringfort located within the field to the immediate north of the proposed substation.	Very High	Indirect	The proposed substation will have a long-term, indirect effect on the setting of the monument. Given the minimal upstanding remains, this is judged to be not significant.	Not Significant	Slight

4.3.3 Cumulative effects

Cumulative effect is defined as 'The addition of many small impacts to create one larger, more significant, impact' (EPA 2017). Cumulative impacts encompass the combined effects of multiple developments or activities on a range of receptors. In this case the receptors are the archaeological monuments and architectural/cultural heritage sites in the immediate vicinity of the proposed scheme. Cumulative impacts at the construction and operational stages are considered.

The subject lands are currently in agricultural use, which will have impacted upon any sub-surface archaeological features or deposits which may be present. Past impacts upon the site include the excavation of drainage ditches, clearance of field boundaries, mechanical cultivation and construction of access routes. Other developments consist mainly of one-off housing and agricultural buildings. One-off housing and buildings are not considered to be detrimental to the setting of archaeological monuments and will not contribute to cumulative effects occurring.

It is intended that the proposed 110kV substation and grid connection will service the Drumdowney Solar Farm, which is currently the subject of a planning application (Planning Ref. 25/60391) to Kilkenny County Council. The proposed development is situated within Parcel 5 of the proposed Drumdowney Solar Farm. The application for the solar farm also includes the internal 33 kV underground connection which links the substation to the proposed Drumdowney Solar Farm. At the time of writing, the solar farm application is undetermined.

The proposed Drumdowney Solar Farm was the subject of a separate archaeological impact assessment (see Hinckley, Pawle, Morgan-James and O'Sullivan 2025). As outlined in Section 2.1, the CHD for the current assessment was compiled in part from that of the previous CHD for the proposed Drumdowney Solar Farm. This means that the same archaeological monuments and architectural/cultural heritage receptors were identified by both assessments.

The proposed Drumdowney Solar Farm is a large scale project, measuring a total area of circa 189 hectares. Although the proposed development footprint is extensive, the majority of the area effected is localised to where subsurface groundworks will take place including the mounting of solar panels, as well as the laying of access routes and cabling. Where such groundworks are required then the construction phase of the proposed development will have a direct effect on any unknown subsurface archaeological features. The separate solar farm AIA outlined the effect the solar farm will have on the cultural heritage sites, and the recommended mitigations which reduce the effect of the mitigations.

The proposed development will have an additional localised, direct effect on any unknown subsurface archaeological features. In this way, it will combine with the Drumdowney Solar Farm to contribute to the cumulative effect on the known and unknown cultural heritage sites.

Other large-scale projects a line uprating project between Cork and Wexford (See Planning Ref. No. 18573). Larger-scale project such as the aforementioned existing and proposed large scale developments can contribute to the cumulative effect.

However, the implementation of mitigation measures recommended in Section 5 for the proposed development will ensure that the cumulative effect is neutral and not significant.

Table 14 — Summary of relevant planning applications in the area

Ref. Number	Status	Status
25/60391	Decision pending	Drumdowney Solar Farm Limited intend to apply for a 10 Year Planning Permission for a solar farm with a total area of circa 189 hectares in the townlands of Atateemore or Blackneys, Ballyhobuck, Ballyrahan, Carriganurra, Charlestown, Davidstown, Drumdowney Lower, Drumdowney Upper, Gorteens, Grogan, Kilmurry, Nicholastown, Rathpatrick, Scartnamoe, Tinvaucoosh and Treanaree in County Kilkenny. The solar farm will consist of solar panels on ground mounted frames, 27 no. single storey electrical inverter/transformer stations, 5 no. single storey spare parts containers, 3 no. Ring Main Units, 5 no. weather stations, underground electrical ducting and cabling within the development site, private lands and within the L3429, L7523, L7563, L7469, L3407, L3414, L34144, L7466, L3406, L7483, L3415, N25 and N29 public roads to connect solar farm field parcels, security fencing, CCTV, access tracks, 7 no. watercourse/drain deck crossings and 4 no. horizontal directional drill crossings (under the N25 and N29 public roads and the Luffany River), temporary construction compounds, landscaping and all associated ancillary development and drainage works. Construction and operational access will be via 7 no. existing entrances from the L3429, L7469, L7466, L4783 and L34142 which will be subject to entrance upgrade works. Separate construction phase access options are proposed for Parcel 4 via Port of Waterford and the L4783 The operational lifespan of the solar farm will be 40 years and planning permission is requested for this duration.
18573	Granted with conditions (08/03/2019)	To develop at existing Grt Isl-Kk 110kV Overhead Line, approx. 49kms long. Approx, 46.4km of existing circuit located within functional area of Cork with approx., 2.6km located within Co. Wexford,
12324	Granted with conditions (20/08/2012)	The development will consist of: A new Dairy Processing and Manufacturing Facility for the manufacture and development of dairy products.
08841	Granted with conditions (28/04/2009)	To construct a detached dormer type dwellinghouse together with associated site development works and associated services installations, including septic tank and percolation area
96682	Granted with conditions (13/02/1997)	Permission to construct a dormer bungalow, separate garage, septic tank and percolation area at Drumdowney Lower, Slieverue.

4.3.4 Visual Amenity

The sites with statutory protection are considered visual amenities due to their known protection or preservation status (statutory or otherwise), and the potential for upstanding remains to survive. The vast majority of the identified CH sites have no above grounds elements with many being identified through aerial photography. Many of the sites are far enough away not to be visually impacted by the proposed solar farm.

The proposed substation compound will have an effect on the visual amenity of CH008, a ringfort located c. 60 m north of the compound boundary. The ringfort has minimal upstanding remains and is located on private land. As such, the effect of the development on the setting of CH008 is judged to be not significant.

5. MITIGATION STRATEGY

The following mitigation measures proposed are subject to approval by the National Monuments Service and the local planning authority. They have been compiled with reference to the *Framework and Principles for the Protection of the Archaeological Heritage* (1999) as well as the National Monuments Service Solar Farm Developments- Internal Guidance Document (2016).

The current state policy is that preservation *in situ* of archaeological material is the preferred option. Where this cannot be achieved then appropriate measures need to be adopted to ameliorate the impacts that the proposed development may have on features of archaeological, architectural and/or cultural heritage within the study area (see Section 1.3) during both the construction and operational phases of the works.

The below recommendations have been compiled with reference to the Framework and Principles for the Protection of the Archaeological Heritage (1999) as well as the following:

- Environmental Protection Agency (2003) *Advice Notes on Current Practice (in the Preparation of Environmental Impact Statements)*
- Environmental Protection Agency (2022) *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EIAR)*
- Department of Arts, Heritage, Gaeltacht and the Islands (DAHGI) (1999) *Frameworks and Principles for the Protection of the Archaeological Heritage*
- Department of the Environment, Heritage and Local Government (2011) *Architectural Heritage Protection Guidelines for Planning Authorities*
- National Monuments Service Solar Farm Developments – Internal Guidance Document (2016)

The following mitigation measures are already included as part of the design:

1. A suitable buffer zone within which no development shall take place has been applied to the extents of CH008, whose zone of notification abuts the application boundary. This buffer zone will be informed by the preceding geophysical survey and testing. All buffer zones will be maintained during construction, operation and decommissioning of the development. Any person wishing to carry out works within the Zone of Notification associated with a known or suspected monument to which Section 14 of the National Monuments Act 1930 (as amended) must obtain Ministerial Consent (see Section 3.1.1).

The following mitigation measures are recommended:

2. As part of an advance works programme prior to construction, a combination of advance geophysical survey and advance archaeological test trenching will be carried out by a suitably qualified archaeologist under licence. Results from these archaeological works shall be compiled in a detailed report setting out any findings and outlining any further mitigation measures that should be employed in relation to the proposed development. This report will be submitted to the National Monuments Service (DOHLGH) and the local planning authority archaeologist.
3. All groundworks such as those related to the access tracks, cables, boundary fences, interface connectors, landscaping and temporary compounds shall be monitored by a suitably qualified archaeologist under licence from the National Monuments Service (DOHLGH). Should any archaeological material be encountered, works will cease and the County Archaeologist and National Monuments Service shall be notified. A strategy will be proposed to the local planning authority archaeologist and National Monuments Service to suitably record any archaeological material identified, and preserve any archaeological material in situ, where possible. Where preservation in situ cannot be achieved, either in whole or in part, then a programme of archaeological excavation will be proposed, to ensure the preservation by record of the area of the development that will be directly impacted upon. Further work will then only be carried out following consultations with the local planning authority archaeologist and the National Monuments Service.
4. Suitable screening should be installed along the boundary with CH008 to reduce the visual impact of the development.
5. Results from these archaeological works shall be compiled in a detailed report setting out any findings and outlining any further mitigation measures that should be employed in relation to the proposed development. This report will be submitted to the National Monuments Service (DOHLGH) and the local planning authority archaeologist.

Please note all recommendations are subject to the approval of the National Monuments Service and the local planning authority archaeologist.

Table 15 — Summary of effect and effect magnitude after mitigation

CH No.	Phase	Effect Type	Mitigation Measures	Magnitude of Effect after Implementation of Mitigation Measures	Significance of Effect after Implementation of Mitigation Measures
CH008	Construction/Operation	Indirect	Mitigation Nos. 1-5	Imperceptible	Imperceptible

6. CONCLUSIONS

6.1 Archaeological Findings Summary

The archaeological assessment has identified 19 sites of archaeological, and/or cultural heritage significance within the study area (Section 1.3). These include 11 known or suspected monuments, one Protected Structure (CH207), which is also an NIAH site, and five previous excavations.

The proposed development will have no direct effect on any known CH site, and an indirect effect on the setting of CH008.

6.2 Recommendations

It is recommended that the mitigation strategy outlined in Section 5 above be adopted. If the design of the proposed development is altered this assessment will need to be updated accordingly.

Please note all recommendations are subject to the approval of the National Monuments Service and the local planning authority archaeologist.

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APPENDIX 1 INVENTORY OF IDENTIFIED SITES OF CULTURAL HERITAGE SIGNIFICANCE AND/OR POTENTIAL WITHIN STUDY AREA

CH No.	Category	ID	Description	Summary	Townland	Baseline Value	ITM E	ITM N
CH004	RMP	KK044-014004-	A headstone in Rathpatrick graveyard (KK044-014002-) with an English inscription in Roman capitals commemorating Derby O'Bryen. The headstone is dated 1690. (Cockerham 2009, 362)	Headstone	RATHPATRICK (Ida By.)	Very High	664478	615161
CH005	RMP	KK044-014003-	In Rathpatrick church (KK044-014001-). The upper slab of a chest tomb with a Latin inscription in Black Letter commemorating Nicholas FitzThomas FitzGerald of Gurtyn (d. 1617) and his wife Helen Bourke. The slab is dated c. 1609. (Carrigan 1905, vol. 4, 200-201; Cockerham 2009, 353)	Graveslab	RATHPATRICK (Ida By.)	Very High	664478	615161
CH007	SMR	KK044-014001-	'Rathpatrick Church (in Ruins)'	Church	RATHPATRICK (Ida By.)	Very High	664470	615167
CH008	RMP	KK044-013----	No long description available	Ringfort - rath	RATHPATRICK (Ida By.)	Very High	664348	615676

CH009	RMP	KK043-060----	On the NW side of Airmount crossroads, on almost level ground. There are good views to the W over the low-lying Suir Valley and to the Comeraghs. The stones are known locally as 'The Three Friars' (Carrigan 1905, vol. 4, 202). The group consists of three conglomerate standing stones, the largest incorporated into a field wall, with the other two standing stones c. 60m to the NW. The largest stone (H 1.85m; Wth 1.05m by 0.7m) leans to the SW. The smallest stone (H 1.25m; L 1m; W 0.35m) aligned NW-SE and the third stone (H 1.5m; Wth 0.7m by 0.6m) which was 12m NE of the smallest, aligned NW-ESE. The standing stones were excavated and re-located in 2003 to facilitate the construction of the N25 Waterford Bypass (Wren 2006, 276-7). All three stones had been set into sockets cut into the natural boulder clay. The smallest stone (total H 1.45m) had a circle of twelve post-holes surrounding it (ibid.). Testing had revealed the remains of a possible cist burial at the base of the third stone (ibid.). Immediately N of this stone there was a square cut in the natural boulder clay which was interpreted as possibly a socket for a fourth stone (ibid.). This socket was cut on the N side by an oval pit, the vertical sides and base of which were lined with limestone, forming a polygonal cist, with a split red sandstone capstone (ibid.). A fourth	Standing stone	KILMURRY (Ida By.)	Very High	663274	615806

CH No.	Category	ID	Description	Summary	Townland	Baseline Value	ITM E	ITM N
			conglomerate stone (H 0.79m; Wth 0.68m; T 0.43m tapering to 0.14m), lying prostrate, may have been part of the group but excavation revealed no socket where it was lying (ibid.).					
CH014	EX	03E0726	Monitoring was undertaken at Dromdowney Lower, Mallow. No archaeological features or artefacts were identified.	No archaeological significance	DRUMDOWNEY LOWER	Low	664850	614723
CH091	RMP	KK043-036----	No long description available	Cist	KILMURRY (Ida By.)	Very High	663448	615404
CH092	SMR	KK043-082----	No long description available	Fulacht fia	KILMURRY (Ida By.)	Very High	664037	615632
CH093	SMR	KK044-023----	No long description available	Fulacht fia	Luffany (Ida By.)	Very High	664286	616152
CH094	RMP	KK044-022----	No long description available	Cross - Wayside cross	Luffany (Ida By.), Rathpatrick (Ida By.)	Very High	664370	616014
CH095	SMR	KK044-024----	No long description available	Fulacht fia	RATHPATRICK (Ida By.)	Very High	664316	615802
CH140	SMR	KK043-021----	No long description available	kiln	Great Island	Very High	664217	616642

CH No.	Category	ID	Description	Summary	Townland	Baseline Value	ITM E	ITM N
CH142	EX	04 E0769	Waterford City Council proposes to construct an 18km bypass around Waterford city, with associated link roads. The route forms part of the N25 and runs from Kilmeaden in Co. Waterford to Slieverue in Co. Kilkenny. The work outlined here was undertaken at Site 42 in the townland of Rathpatrick, Co. Kilkenny, as part of pre-construction investigations of the N25 Waterford bypass Contract 3. On this site testing by Emmet Stafford identified possible archaeological features (Excavations 2003, No. 1042, 03E0523). Full resolution was carried out in June 2004. The National Roads Authority through Waterford City Council administered the total archaeological cost.	No archaeological significance	Rathpatrick	Low	664297	615356
CH174	EX	02 E0223	The site encompasses a group of fields at the junction between Luffany and Rathpatrick townlands. Testing revealed the remains of post-medieval drainage works, cultivation trenches and field systems. Just at the junction between dry pasture and marsh, the remains of a burnt mound survived. These features and their hinterlands will be subject to more extensive investigation and excavation before construction.	Burnt mound	LUFFANY/RATHPATRICK, Kilkenny	High	664392	616344

CH No.	Category	ID	Description	Summary	Townland	Baseline Value	ITM E	ITM N
CH175	EX	02 E0192	Testing was carried out at the townlands of Kilmurry and Rathpatrick as part of investigation work for the N25 Waterford Bypass. The area was selected for investigation because of its location at the margins of a stream and the potential for remains of human activity, in particular the remains of fulachta fiadh. Three areas produced material indicative of burnt-mound material. Two of these were contained within pits, and the third occurred as a spread of burnt material 12m east of a mound outside the area of the corridor. Two sherds of Leinster cooking ware were recovered as unassociated finds on the buried sod horizon and were not, therefore, linked with defined features. However, a linear feature and pit were found near the pottery. Three distinct groups of cultivation furrows were recorded, and features associated with land improvement consisted of two intersecting drains and a burnt spread resulting from scrub clearance. Mitigation proposals included full excavation of the identified features and monitoring of all topsoil removal.	Pit, Burnt spread and Cultivation ridges	KILMURRY/RATHPATRICK, Kilkenny	High	664392	616344

CH No.	Category	ID	Description	Summary	Townland	Baseline Value	ITM E	ITM N
CH176	EX	03 E0973	Site 11, associated with the construction of the N25 Waterford Bypass, lies on both sides of the stream which forms the boundary of Luffany and Rathpatrick townlands in Co. Kilkenny. Field A to the north and an intervening field with no archaeological interest lie within Luffany, whilst Field B lies within Rathpatrick. Both fields are on the west side of the N25.	Fulacht fia and Pit	LUFFANY, Kilkenny	High	664294	616339

CH207	RPS/NIAH	C288/12404321	Detached five-bay double-height Catholic church, built 1800, on a cruciform plan comprising three-bay double-height nave with single-bay double-height transepts to north and to south, and single-bay double-height chancel to east. Extensively renovated, 1994. Pitched roofs on a cruciform plan with replacement artificial slate, 1994, clay ridge tiles, rendered coping having cut-limestone bellcote to apex to east (with square-headed aperture having cast-iron bell, and carved cornice coping), cross finials to remainder, rooflights, 1994, slightly sproketed eaves, and replacement uPVC rainwater goods, 1994, on rendered eaves retaining square-profile downpipes. Unpainted replacement rendered walls, 1994, with quoins to corners, and cut-limestone date stone/plaque. Pointed-arch window openings (paired to chancel) with cut-limestone sills, hood moulding to west, and fixed-pane timber fittings having leaded stained glass panels. Square-headed door openings (including to transepts) with cut-limestone block-and-start surround having keystone, and replacement timber double doors, 1994. Full-height interior with timber pews, carved timber stations, and shallow concave balconies to first floor (on octagonal pillars to transepts) having timber balustrades. Set back from road in own grounds with	Catholic Church of the Assumption, KILMURRY, Slieveroe, KILKENNY	KILMURRY	Very High	663409	615066

CH No.	Category	ID	Description	Summary	Townland	Baseline Value	ITM E	ITM N
			limestone ashlar piers having rock-faced panels, moulded stringcourse supporting frieze, cut-limestone capping, iron double gates, iron flanking pedestrian gates, random rock-faced cut-limestone boundary wall having cut-limestone chamfered coping supporting iron railings, and limestone ashlar terminating piers having cut-limestone capping. (ii) Graveyard to site with various cut-stone markers, post-1800-present.					

Note: The abbreviations that have been used for the 'Category' section are as follows:

RMP: Recorded archaeological monument
SMR Sites and Monuments Record
NIAH: National Inventory of Architectural Heritage
RPS: Record of Protected Structures

APPENDIX 2 LEGISLATIVE AND POLICY FRAMEWORK

EIA Legislation

EIA Directive 85/337/EEC as amended by 97/11/EC and 2003/35/EC requires that certain developments be assessed for likely environmental effects before planning permission can be granted. The EIA Amendment Regulations, SI 93 OF 1999 specifies in Section 2(b) of the Second Schedule, 'Information to be contained in an Environmental Impact Statement', that among other factors, information is to be provided on:

'Material assets, including the architectural and archaeological heritage, and the cultural heritage'

Each of these assets is addressed within this assessment report.

Cultural Heritage Legislation

Archaeological Monuments/Sites

Archaeological heritage is protected primarily under the edited. Section 2 of the 1930 National Monuments Act defines the word 'monument' as including:

'any artificial or partly artificial building, structure, or erection whether above or below the surface of the ground and whether affixed or not affixed to the ground and any cave, stone, or other natural product whether forming part of or attached to or not attached to the ground which has been artificially carved, sculptured or worked upon or which (where it does not form part of the ground) appears to have been purposely put or arranged in position and any prehistoric or ancient tomb, grave or burial deposit, but does not include any building which is for the time being habitually used for ecclesiastical purposes'.

Under the 1994 Act, provision was made for a Record of Monuments and Places (RMP). The RMP is a revised set of SMR (Sites and Monuments Record) maps, on which newly discovered sites have been added and locations which proved not to be of antiquity have been de-listed by the National Monuments Service.

In effect, the National Monuments Act 1930–2014, as amended provide a statutory basis for:

- Protection of sites and monuments (RMPs)
- Sites with Preservation Orders
- Ownership and Guardianship of National Monuments
- Register of Historic Monuments (pre-dating AD 1700)
- Licensing of archaeological excavations
- Licensing of Detection Devices
- Protection of archaeological objects
- Protection of wrecks and underwater heritage (more than 100 years old)

In relation to proposed works at or in the vicinity of a recorded archaeological monument, Section 12 (3) of the National Monuments (Amendment) Act 1994 states:

'When the owner or occupier (not being the Commissioners) of a monument or place which has been recorded [in the Record of Monuments and Places] or any person proposes to carry out, or to cause or permit the carrying out of any work at or in relation to such monument or place, he shall give notice in writing of his proposal to carry out the work to the Commissioners and shall not, except in the case of

urgent necessity and with the consent of the Commissioners, commence the work for a period of two months after having given the notice.'

Archaeological artefacts

Section 2 of the 1930 National Monuments Act (amended) defines an archaeological object as (in summary) any chattel in a manufactured or partly manufactured state or an unmanufactured state but with an archaeological or historical association. This includes ancient human, animal or plant remains.

Section 9 (1) of the National Monuments (Amendment) Act 1994 states that any such artefact recovered during archaeological investigations should be taken into possession by the licensed archaeological director and held on behalf of the state until such a time as they are deposited accordingly subsequent to consultation with the National Museum of Ireland.

Architectural Sites

In 1997 Ireland ratified the Granada Convention on architectural heritage. This provided the basis for a national commitment to the protection of the architectural heritage throughout the country. The Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999 and Local Government (Planning and Development) Act 2000 made the legislative changes necessary to provide for a strengthening of the protection of architectural heritage. The former Act has helped to provide for a forum for the strengthening of architectural heritage protection as it called for the creation of a National Inventory of Architectural Heritage which is used by local authorities for compiling the Record of Protected Structures (RPS). The Record of Protected Structures (RPS) is set out in each respective county's Development Plan and provides statutory protection for these monuments.

Section 1 (1) of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999 states:

'architectural heritage means all—

(a) structures and buildings together with their settings and attendant grounds, fixtures and fittings,
(b) groups of such structures and buildings, and
(c) sites, which are of architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest"

The 1999 Act was replaced by the Local Government (Planning and Development) Act 2000 where the conditions relating to the protection of architectural heritage are set out in Part IV of the Act. Section 57 (1) of the 2000 Act states that:

'…the carrying out of works to a protected structure, or a proposed protected structure, shall be exempted development only if those works would not materially affect the character of –

(a) the structure, or
(b) any element of the structure which contributes to its special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest'

APPENDIX 3 TERMS AND DEFINITIONS USED

The following sets out the definitions of the terms which are used throughout the report:

(i) The phrase 'cultural heritage' is a generic term used in reference to a multitude of cultural, archaeological and architectural sites and monuments. The term 'cultural heritage', in compliance with Section 2(1) of the Heritage Act (1995), is used throughout this report in relation to archaeological objects, features, monuments and landscapes as well as all structures and buildings which are considered to be of historical, archaeological, artistic, engineering, scientific, social or technical interest.

(ii) For the purpose of this assessment, each identified cultural heritage site is assigned a unique cultural heritage number with the prefix 'CH'.

(iii) A feature recorded in the 'Record of Monuments and Places' (RMP) refers to a recorded archaeological site that is granted statutory protection under the National Monuments Act 1930–2014, as amended. When reference is made to the distance between an RMP and the proposed development site (see below), this relates to the minimal distance separating the site from the known edge of the RMP. Where the edge of the RMP is not precisely known, the distance relates to that which separates the site from the boundary of the RMP zone of archaeological potential as represented on the respective RMP map; where this is applied, it is stated accordingly.

(iv) An 'area of archaeological potential' refers to an area of ground that is deemed to constitute one where archaeological sites, features or objects may be present in consequence of location, association with identified/recorded archaeological sites and/or identifiable characteristics.

(v) The term 'proposed development site' refers to the defined area of land within which the proposed development, including access tracks etc, may be constructed.

(vi) In relation to the term 'study area' please see Section 1.3 above.

(vii) The term 'receiving environment' refers to the broader landscape within which the study area is situated. Examination of the site's receiving environment allows the study area to be analysed in its wider cultural context.

(viii) The terms 'baseline environment' and 'cultural heritage resource' refer to the existing, identifiable environment against which potential effects of the proposed scheme may be measured.

Note: Information regarding archaeological site types and periods is provided in a glossary in Appendix 4.

APPENDIX 4 GLOSSARY AND DEFINITION OF ARCHAEOLOGICAL TERMS

Church: A building used for public Christian worship. These can be of any date from *c*. AD 500 onwards.

Burnt mound: A circular or irregularly shaped mound of material consisting of burnt stones, ash and charcoal with no surface evidence of a trough or depression. Levelled examples can appear as a spread containing burnt stones. These can be of any date from the Bronze Age (*c*. 2400–500 BC) to the early medieval period (5th–12th century AD). See also *Fulacht fia*.

Enclosure: An area defined by an enclosing element (e.g. bank, wall, fosse, scarp), or indicated as such cartographically, and occurring in a variety of shapes and sizes, possessing no diagnostic features which would allow classification within another monument category. These may date to any period from prehistory onwards.

Field boundary: A continuous linear or curving bank, wall or drain which defines the limits of a field. These date to any period from the Neolithic (*c*. 4000–2400 BC) onwards.

Pit: A circular or sub-circular cropmark/maculae or soil-mark, usually identified from aerial photography, which appears to be the visible evidence of a filled-in excavated hole or cavity in the ground. These may date to any period from prehistory onwards.

Ringfort – cashel: A roughly circular or oval area surrounded by a stone wall or walls. They functioned as residences and/or farmsteads and broadly date from 500 to 1000 AD. See Ringfort - rath for earthen equivalent.

Ringfort – rath: A roughly circular or oval area surrounded by an earthen bank with an external fosse. Some examples have two (bivallate) or three (trivallate) banks and fosses, but these are less common and have been equated with higher status sites belonging to upper grades of society. They functioned as residences and/or farmsteads and broadly date from AD 500 to 1000.

Ringfort – unclassified: A roughly circular or oval area surrounded by an earthen bank with an external fosse (see Ringfort - rath) or a stone wall (see Ringfort - cashel). The term Ringfort - unclassified is used in instances where the surviving remains are insufficient to determine whether the monument was originally a rath or cashel. They functioned as residences and/or farmsteads and broadly date from 500 to 1000 AD.

APPENDIX 5 KILKENNY COUNTY DEVELOPMENT PLAN (2021-2027) EXCERPT

Development Management Requirement: The Council will have regard to the archaeological landscapes associated with the areas listed above in the Plan and may, if considered necessary, require an impact assessment for proposed development which could have a significant impact on the identified landscape.

New sites are continually being discovered and it is advisable to check the National Monument Archaeological database on www.archaeology.ie when considering development on any site. Archaeological structures may, in some situations, also be considered as architectural heritage and therefore may appear on both the Record of Monuments and Places (RMP) and the Record of Protected Structures (RPS). Various types of development can impact on the visual appreciation, setting and amenity of recorded monuments. Such impacts should be adequately assessed and, where possible, eliminated or minimised. Previously unidentified archaeological sites may be uncovered during development works, while archaeological deposits that would be damaged by development must be investigated and recorded in detail. Any proposed development (due to its location, size or nature) with the potential to affect the archaeological heritage resource will be subject to an Archaeological Impact Assessment. This includes proposals close to archaeological monuments, proposals extensive in area (half a hectare or more) or length (1 km or more), and development that requires an Environmental Impact Assessment. The Council will support the implementation of the Sectoral Adaptation Plan14. In some locations, in consultation with landowners, it may be possible to access archaeological heritage sites, and the Council will support and facilitate this where appropriate. In some appropriate locations, signage for archaeological sites and National Monuments may be beneficial.

9.3.1.1 Archaeological Landscapes

An archaeological landscape is a natural landscape that has been deliberately modified by a group (or groups) of people during a particular archaeological period (or periods). It provides context and meaning to individual archaeological sites and helps us to understand how our ancestors lived. Such landscapes have the potential to be of cultural, economic, social and/or environmental value. International best practice, as outlined in the European Convention on the Protection of Archaeological Heritage (Valetta Convention) 1992 and the European Landscape Convention (Florence Convention) 2000 supports a landscape-based approach to archaeological protection. In 2019 the Council carried out a Preliminary Audit of Archaeological Landscapes in County Kilkenny which identified a number of potential archaeological landscape sites, including 3 sites which were selected as a priority for protection, as follows:

- Freestone Hill and environs
- The Lingaun River Valley - specifically the megalithic monuments within it and the relationships between them
- Tory Hill and environs

These sites in particular each have strong visual interconnectedness or sightlines, which can be sensitive to inappropriate development in the vicinity. These are indicated on Figure 9.1.

9.3.1.2 Underwater Archaeology

County Kilkenny's rivers and tidal estuaries contain features and objects associated with its riverine and limited maritime heritage (such as boat wrecks, fishtraps, fording points, bridges etc.). Data on

underwater archaeological sites (marine, coastal and inland waterways), including the Shipwreck Inventory of Ireland and the Ports and Harbours Archive are available from the Underwater Archaeology Unit in the National Monuments Service. Any development either above or below water, including to river banks or coastal edges, within the vicinity of a site of archaeological interest shall not be detrimental to the character of the archaeological site or its setting. Planning applications will be referred to the National Monuments Service where relevant.

9.3.1.3 Walled Towns

County Kilkenny has a rich medieval heritage including a number of walled towns and villages, of which Kilkenny city is perhaps the best known. There are also other towns and villages throughout the county which are known to have been walled, including Callan, Gowran, Inistioge and Thomastown15. Town defences are considered to be monuments for the purposes of the National Monuments Acts, 1930-2004. The Council will support the National Policy on Town Defences16 which sets out national policy for the protection, preservation and conservation of the defences of towns and cities.

9.3.1.4 Industrial Heritage

Kilkenny has a wealth of industrial heritage sites - sites of past industrial activity. This includes sites and machinery relating to extractive industries (e.g. mines and quarries), manufacturing (e.g. corn and textile mills), service industries (e.g. main drainage, water supply, gas, electricity), power (windmills, watermills, steam engines) and transport and communications (e.g. roads, bridges, railways, canals, harbours, airfields). Although some of this heritage extends back to prehistoric times, most of what survives relates to the last 250 years, the period during which Ireland became progressively industrialised.

An Industrial Archaeology Survey of County Kilkenny17 (1990) was commissioned by Kilkenny County Council and this identified significant sites which have since been added to the Record of Protected Structures. Additional audits of Kilkenny's industrial heritage will be carried out as appropriate and as resources allow. Valuable sources of information on lime kilns include the Industrial Archaeological Heritage Survey and various local history projects.

Development Management Requirements:

- To endeavour to preserve in situ all archaeological monuments, whether on land or underwater, listed in the Record of Monuments and Places (RMP), and any newly discovered archaeological sites, features, or objects by requiring that archaeological remains are identified and fully considered at the very earliest stages of the development process and that schemes are designed to avoid impacting on archaeological heritage.
- To require archaeological assessment, surveys, test excavation and/or monitoring for planning applications in areas of archaeological importance if a development proposal is likely to impact upon in-situ archaeological monuments, their setting and archaeological remains.
- To ensure that development within the vicinity of a Recorded Monument is sited and designed appropriately so that it does not seriously detract from the setting of the feature or its zone of archaeological potential. Where upstanding remains of a Recorded Monument exist a visual impact assessment may be required to fully determine the effect of any proposed development.
- To require the retention of surviving medieval plots and street patterns and to facilitate the recording of evidence of ancient boundaries, layouts etc. in the course of development.
- To safeguard the importance of significant archaeological landscapes from developments that would unduly sever or disrupt the relationship, connectivity and/or inter-visibility between sites.

9.3.1.5 Conservation Plans

Conservation Plans are important documents in ensuring the necessary strategies for managing significant archeological and architectural sites is undertaken. Kilkenny County Council has been a key partner for the compilation of the conservation plans for the Kilkenny City Walls18, Rothe House19, St. Mary's Church and Graveyard20, St. Lachtain's Church, Freshford21 and Newtown Jerpoint among others over the years. Other Conservation Plans include St. Canice's Cathedral, Callan Workhouse, High Crosses of Western Ossory and Knockroe Passage Tomb. A conservation plan is currently being compiled for St. Francis' Abbey, Evan's Turret, and sections of Kilkenny City walls which are located on the Abbey Quarter site.

The Council will facilitate and support the implementation of existing (and any further) conservation plans, as resources allow.

Development Management Requirement:

- To adhere to recommendations in Conservation plans when assessing development proposals for these sites

9.3.1.6 Historic Graveyards

The historic graveyards of Kilkenny, in addition to being the resting places of our ancestors, are an important part of the heritage of the county. They contain a wealth of architectural and archaeological features and are refuges for many species of plant and animal. Most historic graveyards are afforded legal protection through the National Monuments (Amendment) Acts and/or the Planning and Development Acts.

Kilkenny County Council has compiled an inventory of the historic graveyards of the County. The data from this survey has been mapped and is available at for inspection on the Council's website22. Advice on caring for and recording historic graveyards is available in Guidance for the Care, Conservation and Recording of Historic Graveyards23.

The Council will conserve and protect historic graveyards and churches within Kilkenny in accordance with national legislation and encourage their maintenance in accordance with conservation principles and as resources allow.

9.3.1.7 Historic Gardens and Designed Landscapes

Historic gardens and designed landscapes are of natural heritage, architectural, landscape, cultural and historical importance. In addition, they are often the important setting of a Protected Structure. The National Inventory of Architectural Heritage (NIAH) has carried out a preliminary survey of historic gardens and designed landscapes in 2003-2005. A total of 196 potential historic gardens and designed landscape sites in County Kilkenny were identified.

Development Management Requirements:

- To seek the protection and sustainable management of historic gardens, parklands and designed landscapes in the Kilkenny County and City, their setting and their visual amenity.
- To request visual impact and /or an architectural heritage impact assessment where development is considered to, have a potential impact on a historic landscape or protected structure.
- To protect elements of designed landscapes within the attendant grounds of Protected Structures, including boundary features.

9.3.2 Architectural Heritage

9.3.2.1 Record of Protected Structures

Protecting architectural heritage is an important function of the planning authority. A Development Plan must include policy objectives to protect structures or parts of structures of special interest. The primary means of achieving this is to include a Record of Protected Structures (RPS) for the functional area within the development plan. A planning authority is obliged to include in the RPS every structure, which, in its opinion, is of architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.

A protected structure, unless otherwise stated in the RPS, includes the interior and exterior of the structure, land lying within the curtilage, any other structures lying within that curtilage25 and their interiors, plus all fixtures and features which form a part of the interior or exterior of any of these structures.

Works which would, in the opinion of the planning authority, have a material effect on the character of the protected structure require planning permission. Those with an interest in a protected structure may seek a Declaration under Section 57(2) which would offer practical guidance in relation to the protection of the structure. Section 57(10)(b) of the Planning and Development 2000 provides that permission may only be granted for the demolition of a protected structure in exceptional circumstances.

There are now approximately 1,400 (City and County) buildings, structures and features listed in the RPS. The RPS (as correct at time of publication) is listed in Appendix I of this written statement. To ensure the protection of the County's architectural heritage, the Council will promote the importance of regular maintenance of structures contained within the Record of Protected Structures. Information is available to owners of protected structures through the Architectural Conservation Office of the Council, while useful information and advice is also provided on the Council's website. The Council will promote best practice and principles in conservation of the built heritage through the custodianship of Protected Structures in the Council's ownership/care. The Council administer and manage conservation grants for the repair and safeguarding of Kilkenny's architectural heritage.

9.3.2.2 National Inventory of Architectural Heritage

The National Inventory of Architectural Heritage (NIAH) survey for Kilkenny was published in 2006-27. The planning authority is obliged to consider for inclusion in its Record of Protected Structures any buildings rated as being of Regional, National or International importance by the NIAH and to consider including structures rated of local importance. The Council are continuing to process, on a phased basis, the addition to the RPS of NIAH buildings recommended for inclusion by the Minister. While structures on this Inventory await assessment for inclusion in the RPS, Kilkenny County Council will have regard to the heritage value of such structures in the context of any development proposals.

Development Management Requirements:

- To have regard to the Architectural Heritage Protection Guidelines28 when assessing proposals for development affecting a protected structure and buildings listed in the NIAH.
- To encourage the sympathetic retention, reuse and rehabilitation of protected structures and their setting, while ensuring the involvement of suitably qualified professionals
- To ensure proposed service upgrades undertake an initial assessment of current services, to ensure the internal environment and fabric is not impacted on by such works. Energy assessments and Architectural Heritage Impact Assessments may be required where energy and service upgrades are proposed.

- To ensure proposed development within the curtilage or attendant grounds of a protected structure respects the protected structure and its setting,
- To require an architectural impact assessment where appropriate for developments within the grounds of country house estates which are Protected Structures.
- To promote principles of best practice in conservation in terms of use of appropriate materials, repair techniques, and thermal upgrades by adhering to the guidelines as set out in Department of Housing, Local Government and Heritage's Advice Series publications
- To promote best conservation principles and practice when assessing proposals for Kilkenny's architectural heritage
- To ensure that energy upgrades for buildings constructed from traditional materials are respectful of architectural features, form, and environmental requirements necessary to maintain breathability in the structure.

9.3.3 Architectural Conservation Areas

Each development plan must include a policy objective to preserve the character of Architectural Conservation Areas (ACAs) within its functional area. An ACA is a place, area, group of structures or townscape, taking account of building lines and heights, that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or that contributes to the appreciation of a protected structure, and whose character it is an objective of the development plan to preserve.

The purpose of designating an area as an ACA is to manage change, affording greater control over the form of development and reducing instances of inappropriate development and demolition. The character of an ACA is often derived from the collective value of an area's buildings, their setting, landscape and other locally important features developed gradually over time. It is usually an expression of our culture and identity and contributes significantly to the quality of our lives.

A general set of policies for all ACAs within the County and City is set out below. A statement of character has also been devised for each of these ACAs in order to identify the character that is worthy of protection. Any works proposed to the exterior of a building within an ACA which would affect the special character of the area would not be considered exempted development. For example, replacement of timber sash windows with inappropriate alternatives (e.g. uPVC) would not be exempted development within an ACA. Where applications are made for works outside an ACA which would have the potential to impact on the character of the ACA, these applications will be assessed using the criteria set out in the Architectural Heritage Protection Guidelines for assessing developments within the attendant grounds of protected structures (Section 13.8 AHPG Guidance on the criteria the planning authority will use to assess proposals for new development and proposals for demolition within an ACA are given in section 3.10 of the Architectural Heritage Protection Guidelines.

Implications for Planning and Development

The objective of the ACA designation is to protect the special character of an area through control and positive management of any changes made to the built environment. Owners and occupiers of nonprotected structures in any ACA should be aware that works which in the opinion of the planning authority would materially affect the character of the area as outlined here would require planning permission.

General ACA Development Management Guidance

- To have regard to the Architectural Heritage Protection Guidelines and the Charter for the Conservation of Historic Towns and Urban Areas (Washington Charter 1987), when assessing proposals for development affecting the character of an ACA

To seek the retention, repair and maintenance of the buildings which make up the streetscape of the ACA

To ensure the retention, repair and the regular maintenance, rather than replacement, of original/early features in buildings which contribute to the character of an ACA such as chimney stacks, roof coverings, roof profiles, external wall treatments, doors and windows, shopfronts and pub fronts, while ensuring appropriate materials and repair techniques are used when repairs are being carried out.

To ensure that inappropriate materials for windows, doors and rainwater goods constructed in aluminium or uPVC are not introduced to buildings within ACAs.

To encourage high quality, contemporary design and materials where appropriate when new buildings are being introduced into an ACA and the retention of the historic scale and plot size. In this regard new development should be of a very high standard of design, and should contribute to the visual enhancement of the area and respect the character of the ACA as set out in the statement of character. New development should be appropriate in form and use to its corner, infill or backland location. Established views to local landmarks should be maintained.

- To ensure that new fascia boards inserted in the shopfront entablature are seamless without visible vertical joints or fixing materials. Hand painted fascia are encouraged and will be favoured over glossy, reflective signage.
- To ensure the preservation of the special character of the ACA when assessing proposals for advertising signage, to limit the number of projecting signs to no more than one on each commercial premises to avoid visual clutter, to control lighting and coloured lighting on facades.
- To seek the retention of mature trees/significant planting (those in good condition) which contribute to the character of each ACA where appropriate.
- To retain historic items of street furniture where they contribute to the character of the ACA, such as, post boxes, benchmarks, gates, plaques, milestones, railings etc.,
- To facilitate the removal of overhead cables throughout the ACA, and to assesses all further cable installations against its likely impact on the character of the ACA. The cumulative impact of wiring is seen as a particular negative impact on the character of ACAs
- To ensure existing stone kerbs and paving, and or cobble stones are to be retained and refurbished, where new kerbs are necessary they shall be in a like for like basis so as to enhance the area's character
- To ensure the embodied energy of the current building stock within ACAs are acknowledged when considering proposed developments, and to encourage the reuse of these building over demolition.

APPENDIX 6 PREVIOUS ARCHAEOLOGICAL EXCAVATIONS

Site name: DRUMDOWNEY LOWER
Sites and Monuments Record No.: CO024-153001–2
Licence number: 03E0726
Author: Colm Moloney, Headland Archaeology Ltd.
ITM: E 552396m, N 602474m
Monitoring was undertaken at Dromdowney Lower, Mallow. No archaeological features or artefacts were identified.

Site name: LUFFANY/RATHPATRICK
Sites and Monuments Record No.: N/A
Licence number: 02E0223
Author: Joanna Wren, for ADS Ltd
ITM: E 664392m, N 616344m
The site encompasses a group of fields at the junction between Luffany and Rathpatrick townlands. Testing revealed the remains of post-medieval drainage works, cultivation trenches and field systems. Just at the junction between dry pasture and marsh, the remains of a burnt mound survived. These features and their hinterlands will be subject to more extensive investigation and excavation before construction.

Site name: KILMURRY/RATHPATRICK
Sites and Monuments Record No.: N/A
Licence number: 02E0192
Author: Cathy Sheehan, ADS Ltd.
ITM: E 664392m, N 616344m
Testing was carried out at the townlands of Kilmurry and Rathpatrick as part of investigation work for the N25 Waterford Bypass. The area was selected for investigation because of its location at the margins of a stream and the potential for remains of human activity, in particular the remains of fulachta fiadh. Three areas produced material indicative of burnt-mound material. Two of these were contained within pits, and the third occurred as a spread of burnt material 12m east of a mound outside the area of the corridor. Two sherds of Leinster cooking ware were recovered as unassociated finds on the buried sod horizon and were not, therefore, linked with defined features. However, a linear feature and pit were found near the pottery. Three distinct groups of cultivation furrows were recorded, and features associated with land improvement consisted of two intersecting drains and a burnt spread resulting from scrub clearance. Mitigation proposals included full excavation of the identified features and monitoring of all topsoil removal.

Site name: RATHPATRICK
Sites and Monuments Record No.: N/A
Licence number: 04E0769
Author: Linda Hegarty, Headland Archaeology Ltd.
ITM: E 664297m, N 615356m

Waterford City Council proposes to construct an 18km bypass around Waterford city, with associated link roads. The route forms part of the N25 and runs from Kilmeaden in Co. Waterford to Slieverue in

Co. Kilkenny. The work outlined here was undertaken at Site 42 in the townland of Rathpatrick, Co. Kilkenny, as part of pre-construction investigations of the N25 Waterford bypass Contract 3. On this site testing by Emmet Stafford identified possible archaeological features (Excavations 2003, No. 1042, 03E0523). Full resolution was carried out in June 2004. The National Roads Authority through Waterford City Council administered the total archaeological cost.

Following topsoil-stripping of an area measuring 1877m2, eleven irregular pits were identified. The nondescript nature of the features identified, the absence of artefacts and the very low yield of archaeological material from environmental sample analysis suggested that these features were associated with land clearance.

Site name: LUFFANY
Sites and Monuments Record No.: N/A
Licence number: 03E0973
Author: Angus Stephenson, for ADS Ltd.
ITM: E 664294m, N 616339m

Site 11, associated with the construction of the N25 Waterford Bypass, lies on both sides of the stream which forms the boundary of Luffany and Rathpatrick townlands in Co. Kilkenny. Field A to the north and an intervening field with no archaeological interest lie within Luffany, whilst Field B lies within Rathpatrick. Both fields are on the west side of the N25.

Field A is bounded to the south by a stream and thick vegetation and on the west by another thick hedge. Ground level tips down in these directions and the land becomes more boggy to the west. The area examined was cut by several modern land drains, generally running from north-east to south-west. The courses of six former stream channels were also traced across this field, five of them running from north to south and the sixth running from east to west, all taking a very meandering path. These channels were up to 2m wide and 0.6m deep. Although no finds were recovered, they are thought to have been allowed to silt up or backfill at the time of enclosure in the late 18th or early 19th centuries. The stream nearest to the road appeared to have been recut by human hand.

Field B lay on a gentle slope down to the west in its eastern half and had a flat boggy area next to the modern stream in the west. The change in the slope also coincided with a change in the subsoil from orange-brown sandy clay to grey marl. Topsoil was stripped over an area of c. 35m2 where a large spread of charcoal and burnt stones had been recorded in testing. A small number of post-medieval potsherds were found during this operation.

Two parallel ditches, 6m apart, 1m wide and 0.5m deep, ran north–south across the stripped area. The area between these and immediately adjacent to them was conspicuously rockier than the areas further away and the ditches are interpreted as modern redundant field boundaries, with rocks dumped between them generated by modern ground clearance. They may have dated from the 18th century and a small stream shown here on a small-scale map of 1764 had disappeared by the time of the first-edition OS map of 1839. Frequent tree- and shrub-holes in this area suggested that it was densely overgrown.

Most of the burnt material lay between the two ditches and its maximum width, north–south, was 14m. Two large pits containing burnt stones were excavated to the east of the eastern ditch. The first of these was probably originally oval shaped in plan and 1.2m wide but had been truncated by the ditch; it was 0.25m deep. The second was rectangular and measured 1.3m by 0.8m and was also 0.25m deep. Two

further oval-shaped pits were cut through the upper layers of the burnt material, each measuring 1.5m by 1m by 0.5m. The depth of the deposits of burnt stones did not exceed 0.2m at any point, except as backfill to the troughs.

A large central circular pit under the mound, partially under one of the upper pits, measured 2m by 1m deep. This earliest pit had post-holes in its edge and there were post-holes close to the edge of some of the others. None of the pits showed evidence of having being lined.

These remains are interpreted as a fulacht fiadh, or burnt mound. Fulachta fiadh are generally believed to be prehistoric sites used for communal cooking, although other suggested uses have included bathing and textile production and a site such as this might have supported a combination of such uses. They are usually dated to the Bronze Age and, although no associated finds were recovered, it is expected that carbon dating of samples will ascribe a similar date to this example. It has some of the usual components – a crescentic shape of typical size and successive troughs backfilled with burnt material – although, at c. 50m distant, it is slightly further away from a water source than usual.

The area to the west contained many dark silty patches, the largest being 5m in diameter, in the top of the natural marl, which were investigated using a mini-digger. These were thought possibly to be marl-extraction pits, as this activity had been carried on in the field within living memory. This may have been true of some of the larger pits, although the shallower ones appear to have been only silt-filled depressions in the subsoil. None of the pits exceeded 0.6m in depth, with the majority being less than 0.3m deep. They are considered to have been of minimal archaeological significance.

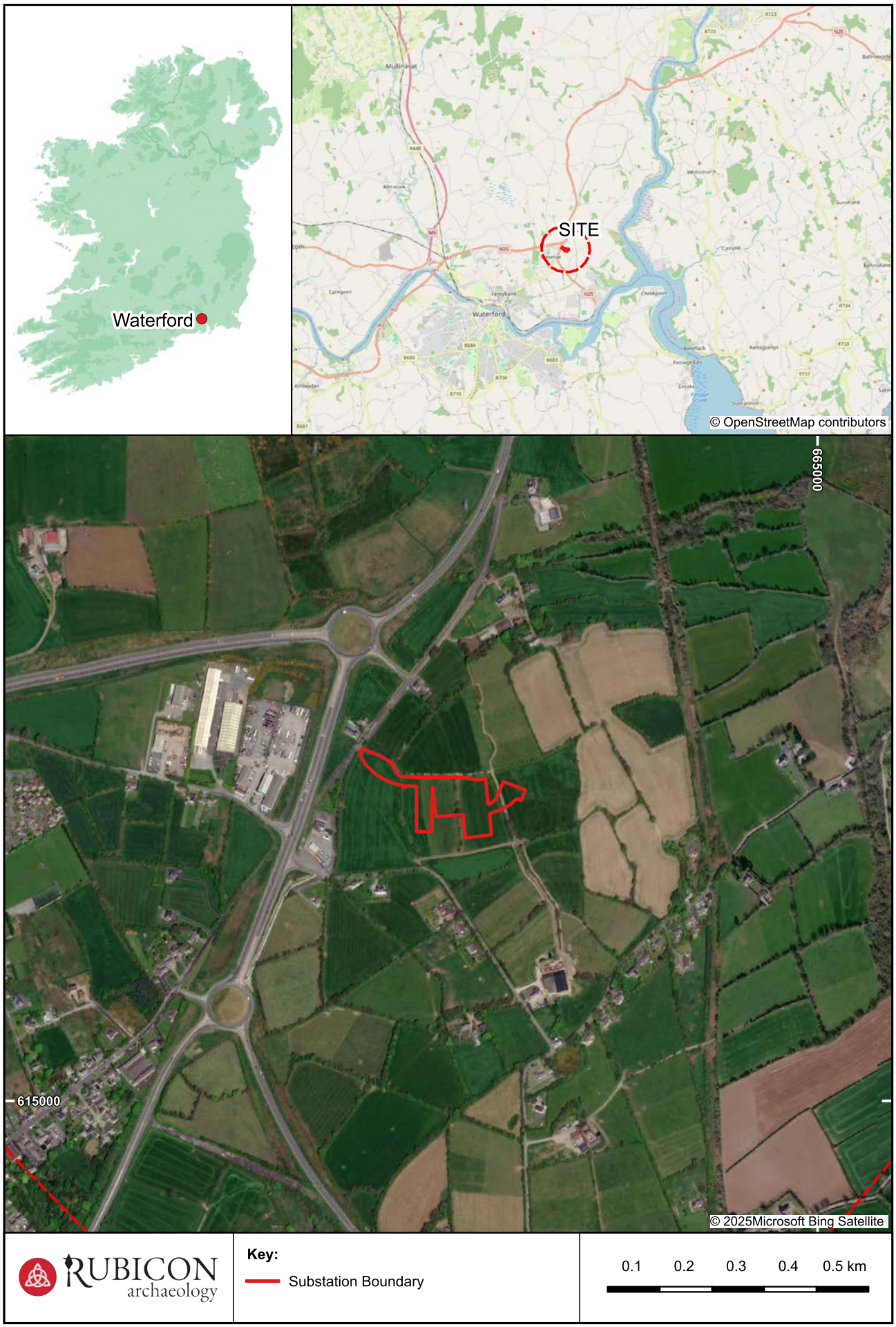


Figure 1 - Site location plan.

RUBICON archaeology

Legend

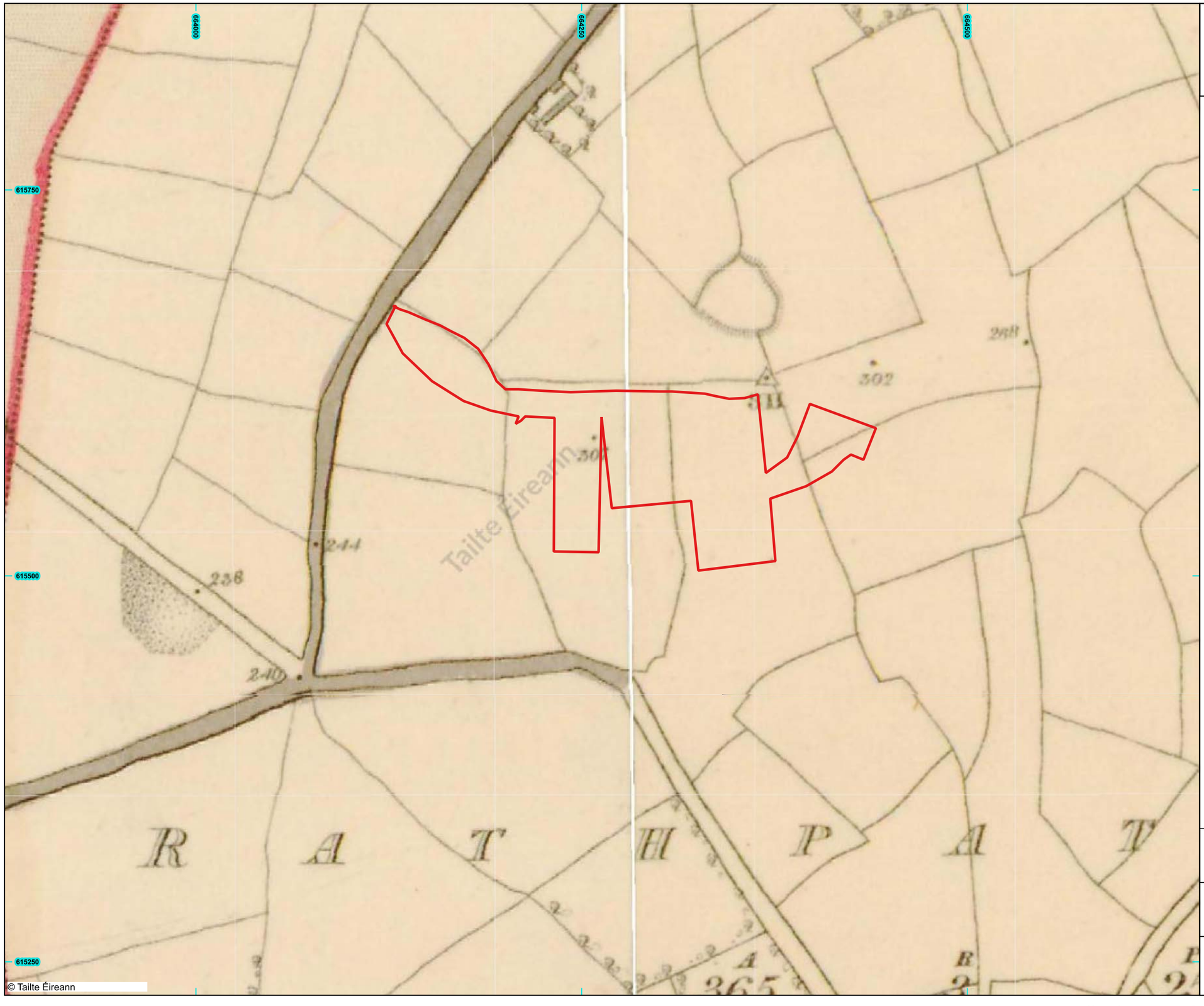
- Substation Boundary
- 1km Study Area
- SMR Zones

Location Map: 1:200,000

Project: RH1682 Drumdowney SID	Prepared by: R.A.Kelly Approved by: R.Morgan-James
Status: SID Version: 2.0	Date: 20/11/2025 Scale: 1:20,000 @ A3

0.1 0.2 0.3 0.4 0.5 km

Figure 2 - Cultural heritage sites within the proposed development study areas.



RUBICON archaeology

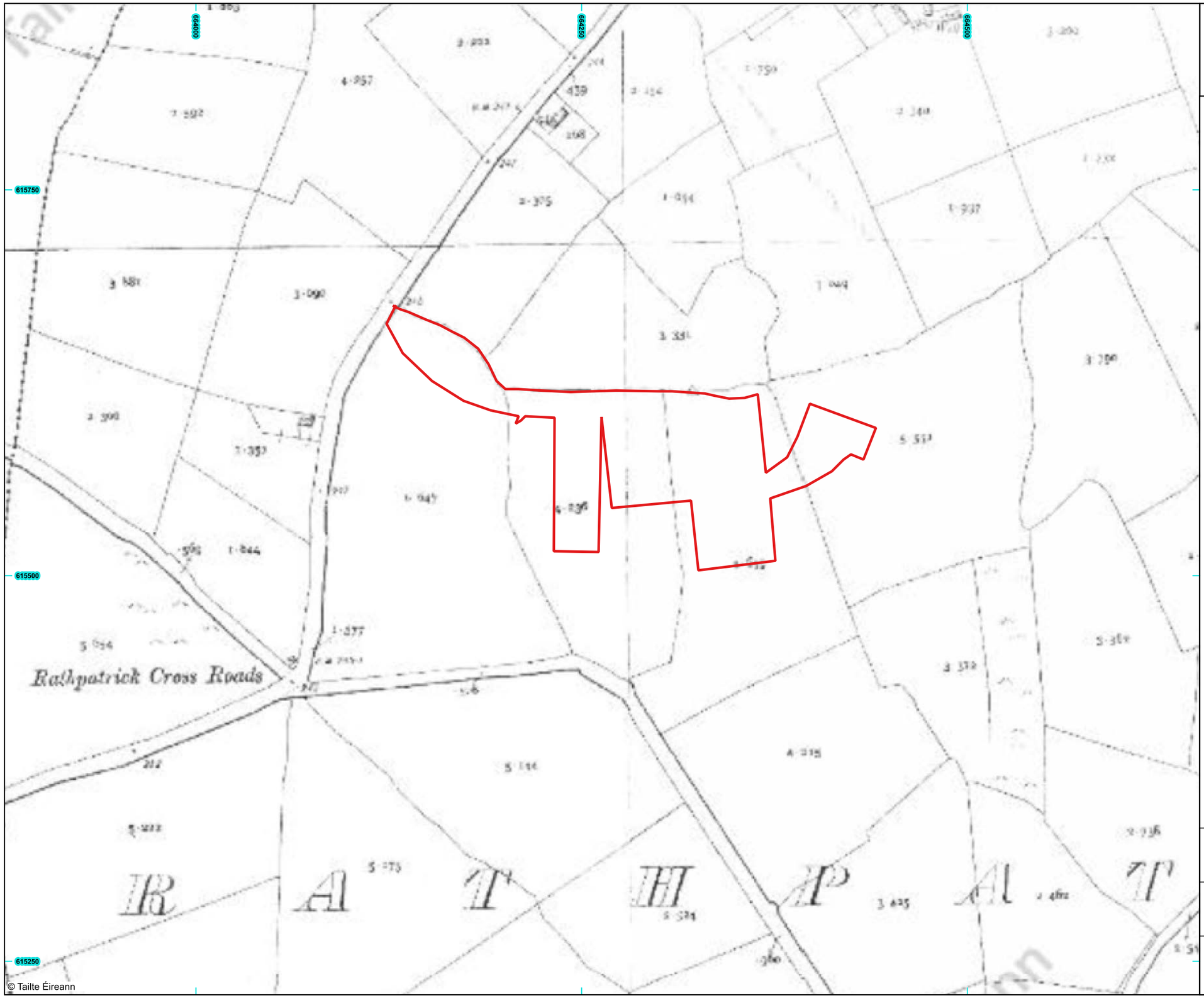
Legend

Substation Boundary

Project: RH1682 - Drumdowney SID	Prepared by: C.O'Sullivan Approved by: R.Morgan
Status: AIA Draft: 3.0	Date: 12/12/2025 Scale: 1:2,500 @ A3

25 50 75 100 125 m

Figure 3 - Proposed Development overlain on to 6 Inch Map



RUBICON archaeology

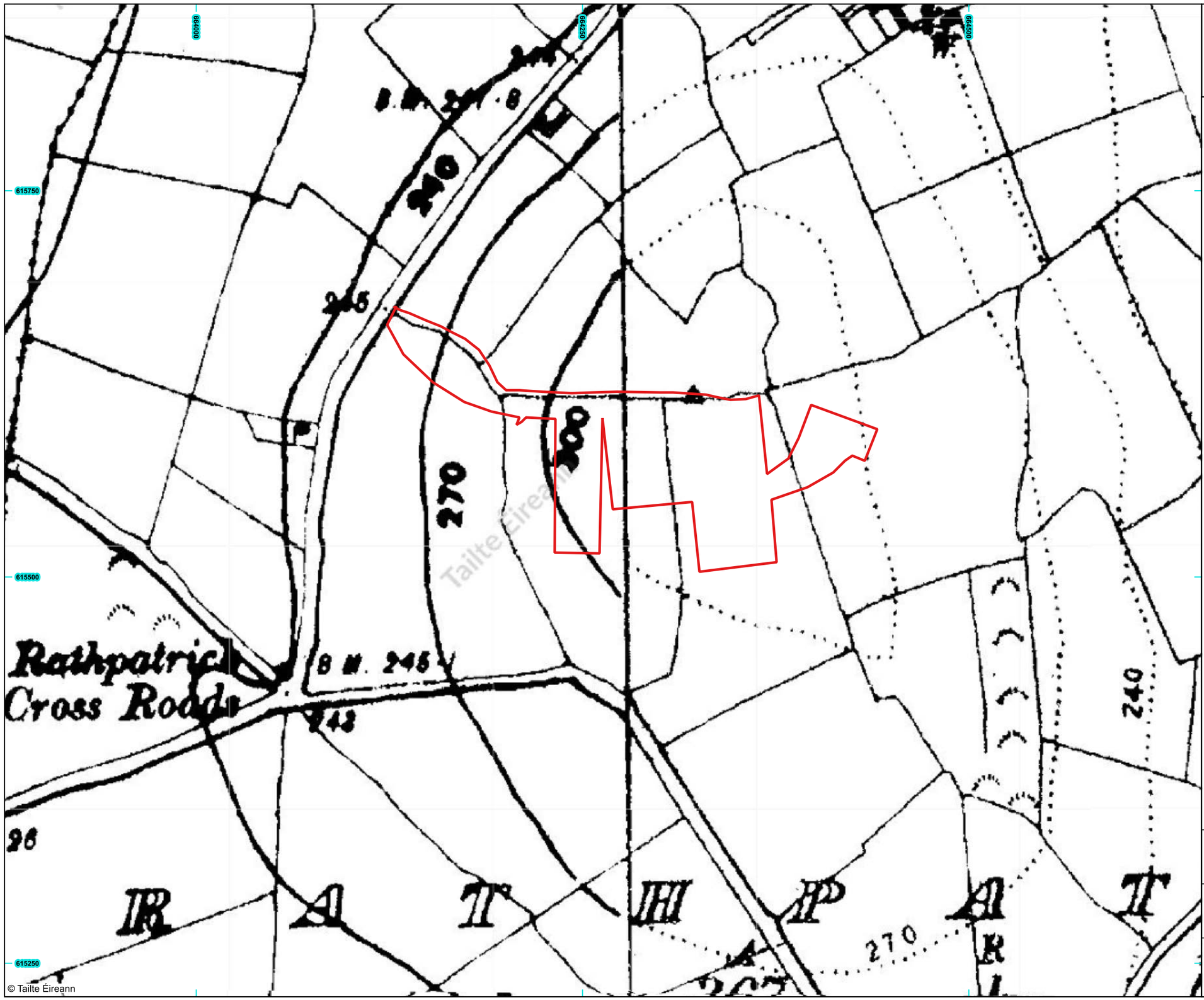
Legend

- Substation Boundary
- 33kV Interconnector Cable

Project: RH1682 - Drumdowney SID	Prepared by: C.O'Sullivan Approved by: R.Morgan
Status: AIA Draft: 3.0	Date: 12/12/2025 Scale: 1:2,500 @ A3

25 50 75 100 125 m

Figure 4 - Proposed Development overlain on to 25 Inch Map



RUBICON archaeology

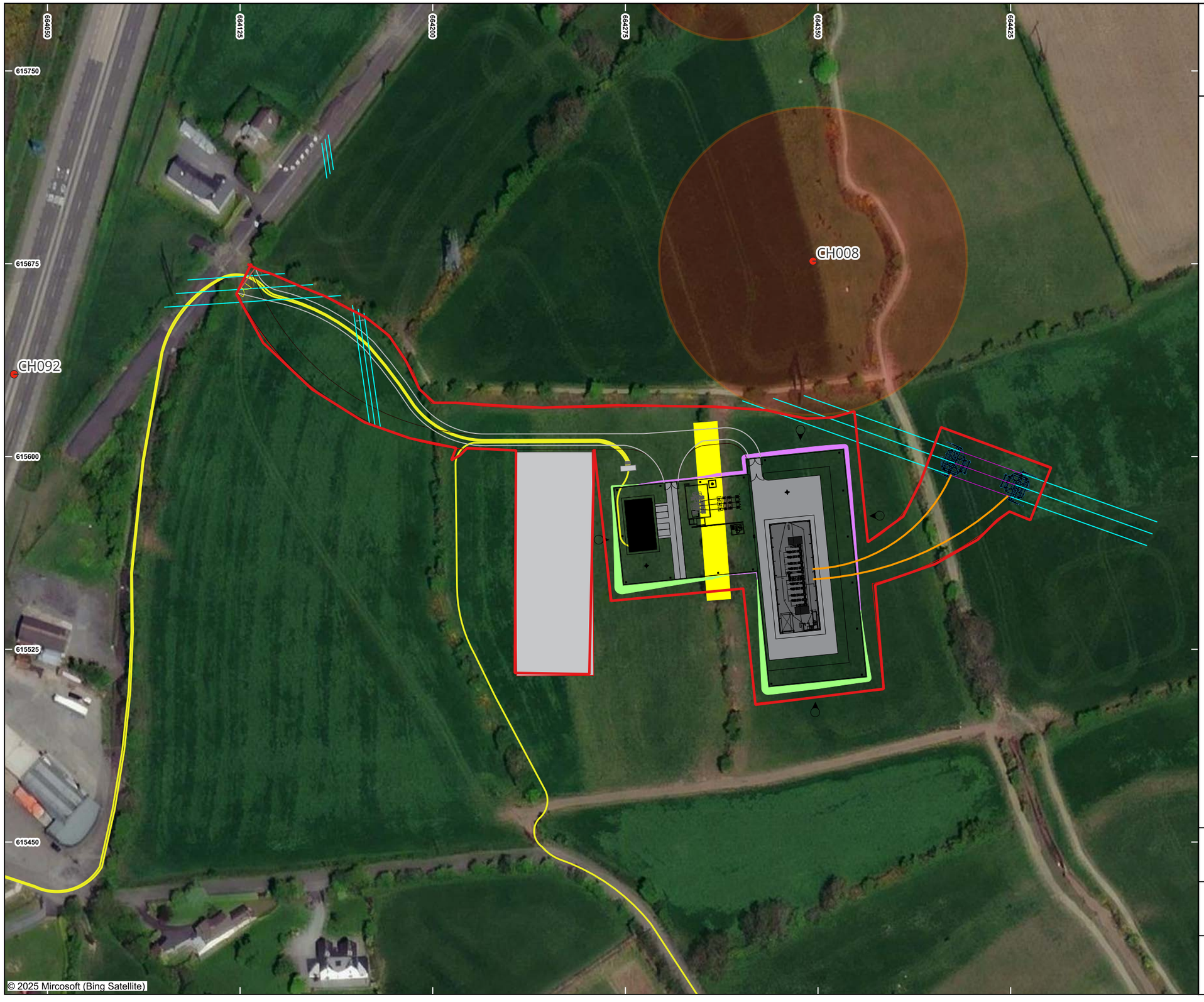
Legend

Substation Boundary

Project: RH1682 - Drumdowney SID	Prepared by: C.O'Sullivan Approved by: R.Morgan
Status: AIA Draft: 3.0	Date: 12/12/2025 Scale: 1:2,500 @ A3

25 50 75 100 125 m

Figure 5 - Proposed Development overlain on to Cassini 6 IN Map



RUBICON archaeology

Legend

- Substation Boundary
- 33kV Interconnector Cable
- Interface Towers
- 110kV cables

CH Sites Baseline Value

- Very High
- High
- Low
- SMR Zones

Project: RH1682 Drumdowney SID	Prepared by: C.O'Sullivan Approved by: R.Morgan-James
Status: SID Draft: 3.0	Date: 04/12/2025 Scale: 1: 1, 500 @ A3

15 30 45 60 75 m

Figure 6 - Proposed substation layout with CH sites.

Plate 1 - View of ringfort (CH008), facing north