

14.

## CULTURAL HERITAGE

14.1

### Introduction

This cultural heritage chapter was prepared by Tobar Archaeological Services Ltd. It presents the results of an archaeological, architectural and cultural heritage impact assessment of the Prospective Development.

The purpose of this chapter is to assess the potential direct and indirect effects of the Prospective Development on the surrounding archaeological, architectural and cultural heritage landscape. The assessment is based on both a desktop review of the available cultural heritage and archaeological data, and a field inspection of the Site. An assessment of potential effects, including cumulative and transboundary effects, is presented.

As detailed in Section 1.1.1 in Chapter 1 of this EIAR, the various development components are described and assessed using the following references: 'Subject Development', 'Existing Development', 'Prospective Development', 'Permitted Development', 'Site', 'Wind Farm Site', 'Grid Connection Site', 'BMEP Site', 'Grid Connection', 'November 2020 Peat Slide', '2017 EIAR' and 'proposed turbines' or 'proposed turbine locations'.

A full description of the Prospective Development is provided in Chapter 4 of this EIAR.

14.1.1

### Prospective Development Location

14.1.1.1

#### Wind Farm Site

The Wind Farm Site, which refers to the area of the Site surrounding the wind turbines and associated infrastructure (including the onsite 110kV substation) from the wind farm site entrance off the N15 National Road, is located in County Donegal, approximately 8 km southwest of the twin towns of Ballybofey and Stranorlar and approximately 12 km northeast of Donegal Town.

The Wind Farm Site covers an area of approximately 892 ha, within the townlands of Meenbog and Croaghonagh. The Wind Farm Site borders County Tyrone in Northern Ireland, specifically the administrative division of Omagh West, Barony of Termonamongan and the townlands of Slievadoo, Meenakeeran, and Sixth Corgary or Second Croagh along the Southeast of the Wind Farm Site boundary. The Wind Farm Site lies within four Electoral Divisions (EDs); Golland, Dooish, Tawnawully and Clogher, in County Donegal. Current land-use at the Wind Farm Site is comprised of the partially constructed Meenbog Wind Farm and areas of commercial forestry and blanket bog. The surrounding land-use predominantly comprises peat bogs, commercial forestry and other seminatural areas with limited residential use along local roads, as well as a quarry adjacent to the Wind Farm Site entrance off the N15 National Road.

The elevation of the Wind Farm Site is between approximately 180 metres above Ordnance Datum (mOD) and 313 mOD, with elevations on the Wind Farm Site generally decreasing and sloping in a north or north-westerly direction. A small section to the south of the Wind Farm Site slopes to the southeast. The Wind Farm Site is generally bordered on all sides by forestry plantations, with the southeastern boundary also being defined by the Northern Ireland border. The Wind Farm Site drains directly to the Bunadowen River and the Shruhangerve stream, which flow to the north, each of which are tributaries of the larger Mourne Beg River that proceeds to flow downstream into the River Derg. The Wind Farm Site also drains into the Glendergan River to the south-southeast, which is also a tributary of the River Derg. Existing access is from the N15 National Road in the northwest of the Wind

Farm Site and the L-6554 Local Road to the north of the Wind Farm Site. The N15 National Road runs south-west to north-east with the Wind Farm Site lying to the east of the road.

#### 14.1.1.2 Grid Connection Site

The Grid Connection Site has a total area of approximately 9 ha and extends from the Wind Farm Site entrance along the N15 National Road to the Clogher 110kV substation, approximately 6.5 km southwest of the onsite 110kV substation. Within the Grid Connection Site, the Grid Connection underground cabling route originates at the onsite 110kV substation within the Wind Farm Site and travels to the northwest along an existing wind farm access road. The Grid Connection then exits the Wind Farm Site entrance and follows the N15 southwest for approximately 6 km, before exiting the N15 National Road onto the L-2595 Local Road. It is then routed southeast along the L-1985 Local Road and through agricultural lands adjacent to the L-1985 before continuing along and adjacent to a private road to reach the Clogher 110kV substation.

The Grid Connection Site traverses the townlands of Ardinawark, Keadew Upper, Keadew Lower, Cullionboy, Cashelnavean, Tawnawully Mountains and Friarsbush.

#### 14.1.1.3 BMEP Site

The Biodiversity Management and Enhancement Site (BMEP Site) covers an area of approximately 117 ha. The BMEP Site is comprised of two parcels of land both contained entirely within the townland of Tievecloghoge, referred to as Parcel 1 (to the east) and Parcel 2 (to the west), which have a combined area of approximately 117 ha, ~108 ha of which are intended for enhancement. Land use on the BMEP Site within Parcel 1 and Parcel 2 currently comprises coniferous forestry and associated forestry access tracks, which is proposed to be felled and converted to peatland and scrub habitats. Site access to Parcel 1 is via a new access track located along the L-65242 Local Road, whilst site access to Parcel 2 is via an existing access track (to be extended and upgraded) located along the L-2974 Local Road. Parcel 2 is located approximately 2.3km east of the Wind Farm Site, and Parcel 1 is located approximately 4.2km east of the Wind Farm Site. There is an elevation difference of 4m (174 mOD elevation SW to 170 mOD elevation NE) on the BMEP Site.

Details of the proposed enhancement/restoration measures to be undertaken at the BMEP Site is contained in Appendix 6-4 Biodiversity Management and Enhancement Plan of this EIAR.

### 14.1.2 Statement of Authority

This chapter of the EIAR has been prepared by Miriam Carroll of Tobar Archaeological Services Ltd. Miriam graduated from University College Cork in 1998 with a Masters degree in Methods and Techniques in Irish Archaeology. She is licensed by the Department of Housing, Local Government and Heritage (DHLGH) to carry out excavations and is a member of the Institute of Archaeologists of Ireland. Miriam has been working in the field of archaeology since 1994 and has undertaken numerous projects for both the private and public sectors including excavations, site assessments (EIAR) and surveys. Miriam Carroll is a director of Tobar Archaeological Services which has been in operation for over 20 years.

### 14.1.3 Relevant Guidance and Legislation

#### 14.1.3.1 Guidance

The assessment of the potential effects of the Prospective Development on cultural heritage has been carried out in accordance with the various planning policies and guidance detailed in Section 1.2 in Chapter 1 of this EIAR, and the following:

- Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts, Heritage and the Gaeltacht, 2011).
- Department of Arts, Heritage, Gaeltacht and the Islands, 1999, Framework and Principles for the Protection of the Archaeological Heritage, 1999.
- Guidance on Setting and the Historic Environment, Historic Environment Division, February 2018.
- Donegal County Development Plan 2024-2030.
- Derry City & Strabane District Council Local Development Plan (LDP) 2032 Guidelines for Cultural Heritage Impact Assessment of TII National Road and Greenway Projects (TII September 2025).

### 14.1.3.2 Legislation

Archaeological monuments are safeguarded through national and international policy, which is designed to secure the protection of the cultural heritage resource. This is undertaken in accordance with the provisions of the European Convention on the Protection of the Archaeological Heritage (Valletta Convention). This was ratified by Ireland in 1997.

Both the National Monuments Acts 1930 to 2004 and relevant provisions of the Cultural Institutions Act 1997 are the primary means of ensuring protection of archaeological monuments, the latter of which includes all man-made structures of whatever form or date. There are a number of provisions under the National Monuments Acts which ensure protection of the archaeological resource. These include the Register of Historic Monuments (1997 Act) which means that any interference to a monument is illegal under that Act. All registered monuments are included on the Record of Monuments and Places (RMP).

The Record of Monuments and Places (RMP) was established under Section 12 (1) of the National Monuments (Amendment) Act 1994 and consists of a list of known archaeological monuments and accompanying maps. The Record of Monuments and Places affords some protection to the monuments entered therein. Section 12 (3) of the 1994 Amendment Act states that any person proposing to carry out work at or in relation to a recorded monument must give notice in writing to the Minister (Environment, Heritage and Local Government) and shall not commence the work for a period of two months after having given the notice. All proposed works, therefore, within or around any archaeological monument are subject to statutory protection and legislation (National Monuments Acts 1930-2004).

The term ‘national monument’ as defined in Section 2 of the National Monuments Act 1930 means a monument *‘the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic or archaeological interest attaching thereto’*. National monuments in State care include those which are in the ownership or guardianship of the Minister for Arts, Heritage and the Gaeltacht. Section 5 of the National Monuments Act (1930) allows owners of other national monuments to appoint the Minister for the Arts, Heritage and the Gaeltacht or the relevant local authority as guardian of such monuments, subject to their consent. This means in effect that while the property of such a monument remains vested in the owner, its maintenance and upkeep are the responsibility of the State. Some monuments are also protected by Preservation Orders and are also regarded as National Monuments. National Monuments also includes (but not so as to limit, extend or otherwise influence the construction of the foregoing general definition) every monument in Saorstát Éireann to which the Ancient Monuments Protection Act, 1882, applied immediately before the passing of this Act, and the said expression shall be construed as including, in addition to the monument itself, the site of the monument and the means of access thereto and also such portion of land adjoining such site as may be required to fence, cover in, or otherwise preserve from injury the monument or to preserve the amenities thereof.

The Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 will replace the existing National Monuments Acts (1930-2014) when it is brought into force by Ministerial Order. The

majority of provisions of this Act have not yet come into force. One Commencement Order (Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 (Commencement) Order 2024 (S.I. No. 252 of 2024)) relating to Sections 1-6 and Section 7 insofar as relates to the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999 (other than section 5) came into effect on the 31<sup>st</sup> May 2024. These provisions relate to World Heritage Property in the State, inventories, the protection of certain records, the promotion of heritage, and the issuing of statutory guidance. Certain related and supporting provisions concerning implementation and enforcement are also commenced ([www.archaeology.ie/news](http://www.archaeology.ie/news)). The provisions now in force allow for the establishment and maintenance of inventories of relevant things of archaeological interest, architectural heritage, and wrecks of archaeological or historic interest. This bolsters the status of existing inventories recording sites of archaeological, historic and architectural interest, both on land and under the sea. It also ensures that legal protection is afforded to certain records or archaeological objects in the event that a person or company in possession of such records is no longer in a position to maintain them, which further strengthens existing practices (<https://www.gov.ie/>).

Under the Heritage Act (1995) architectural heritage is defined to include *'all structures, buildings, traditional and designed, and groups of buildings including street-scapes and urban vistas, which are of historical, archaeological, artistic, engineering, scientific, social or technical interest, together with their setting, attendant grounds, fixtures, fittings and contents...'* A heritage building is also defined to include *'any building, or part thereof, which is of significance because of its intrinsic architectural or artistic quality or its setting or because of its association with the commercial, cultural, economic, industrial, military, political, social or religious history of the place where it is situated or of the country or generally'*.

The Planning and Development Act 2000 (as amended) provides for the protection of the architectural heritage. Guidelines under section 28 of the Act cover all aspects of the protection for architectural heritage under the planning code including protected structures.

#### 14.1.3.3 Granada Convention

The Council of Europe, in Article 2 of the 1985 Convention for the Protection of the Architectural Heritage of Europe (Granada Convention), states that *'for the purpose of precise identification of the monuments, groups of structures and sites to be protected, each member State will undertake to maintain inventories of that architectural heritage'*. The Granada Convention emphasises the importance of inventories in underpinning conservation policies.

The National Inventory of Architectural Heritage (NIAH) was established in 1990 to fulfil Ireland's obligations under the Granada Convention, through the establishment and maintenance of a central record, documenting and evaluating the architectural heritage of Ireland. Article 1 of the Granada Convention establishes the parameters of this work by defining 'architectural heritage' under three broad categories of Monument, Groups of Buildings, and Sites:

- Monument: all buildings and structures of conspicuous historical, archaeological, artistic, scientific, social or technical interest, including their fixtures and fittings;
- Group of buildings: homogeneous groups of urban or rural buildings conspicuous for their historical, archaeological, artistic, scientific, social or technical interest, which are sufficiently coherent to form topographically definable units;
- Sites: the combined works of man and nature, being areas which are partially built upon and sufficiently distinctive and homogenous to be topographically definable, and are of conspicuous historical, archaeological, artistic, scientific, social or technical interest.

The Council of Europe's definition of architectural heritage allows for the inclusion of structures, groups of structures and sites which are considered to be of significance in their own right, or which are of significance in their local context and environment. The NIAH believes it is important to consider the

architectural heritage as encompassing a wide variety of structures and sites as diverse as post boxes, grand country houses, mill complexes and vernacular farmhouses.

#### 14.1.3.4 Donegal County Development Plan 2024-2030

The Donegal County Development Plan 2024-2030 (DCDP) was adopted by Resolution of Members on 16th May, 2024.

Chapter 11 of the DCDP outlines a number of policies and objectives relating to archaeology and built heritage with the relevant policies, detailed below.

##### 14.1.3.4.1 Built and Architectural Conservation

The DCPD notes that Donegal County Council recognises the importance of identifying, valuing and safeguarding the architectural heritage of Donegal. It will do this through sustainable protection of our historic structures to ensure our architectural heritage remains for the use and enjoyment of future generations.

#### Objectives

AH-O-1 Conserve, manage, protect and enhance the architectural heritage of Donegal namely Protected Structures, Architectural Conservation Areas, NIAH structures, designed landscapes and historic gardens, vernacular, historic building stock industrial and maritime built heritage, character and setting of such structures.

AH-O-2 Promote the sustainable and sensitive re-use of the existing built heritage as a positive response to climate change, and promote the circular economy and climate mitigation and adaptation through proper maintenance, repair and appropriate retro-fitting, adaptative re-use and regeneration employing best conservation practice. This objective will be pursued on a collaborative and integrated basis in partnership with all relevant stakeholders and through all available funding mechanisms.

AH-O-3 Protect all structures and parts of structures on the Record of Protected Structures and to extend the RPS where appropriate.

#### Policies

AH-P-1 Seek to ensure best conservation practice through the application of the Guiding Principles of Architectural Conservation as referenced above, where appropriate including in relation to RPS, NIAH, and Vernacular structures and within ACA's. In this regard, the use of specialist conservation professionals, conservation plans and crafts persons shall be encouraged.

AH-P-2 Protect traditional shopfronts and signage and where required and appropriate, ensure new shopfronts are of a high-quality architectural design.

#### AH-P-2A

- Promote the maintenance and appropriate re-use of the existing buildings stock of buildings with architectural merit as a more sustainable option to their demolition and replacement.
- Ensure that measures to upgrade the energy efficiency of protected structures and traditionally built historic structures are sensitive to traditional construction methods, employ best practice and use appropriate materials and methods that will not have a detrimental impact on the material, functioning or character of the building.

AH-P-2B Preserve, protect and enhance the special built character and functions of the 'Heritage Towns' of Ardara, Ballyshannon, Moville, Ramelton and Raphoe.

#### AH-P-3

- a. Protect all structures or parts of structures on the RPS to include protection of the curtilage, attendant grounds; and,
- b. Require that development proposals directly affecting structures on the RPS are appropriate in terms of architectural treatment, character, scale, and form to the existing protected structure and not detrimental to the special character and integrity of the protected structure and its setting save to the extent necessary to provide for strategic infrastructure projects including but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner Relief Road and Greenways, subject to such projects being in accordance with all relevant statutory and regulatory provisions.

#### AH-P-4

- a. Extend the Record of Protected Structures in order to provide a comprehensive schedule for the protection of structures of special importance in the County during the lifetime of the Plan; and
- b. Identify structures for inclusion in the Record of Protected Structures based on the criteria set out in the Architectural Heritage Protection, Guidelines for Planning Authorities (2011), the NIAH and Ministerial recommendations.

AH-P-5 Any proposed development that includes proposed works to an RPS structure shall, where appropriate, provide for the works affecting the Structure to be carried out in the first phase of the development to prevent endangerment, abandonment and/or dereliction of the structure.

### 14.1.3.4.2 **National Inventory of Architectural Heritage**

#### Policies

AH-P-7 Protect NIAH structures by requiring that development of structures on the NIAH including the curtilage, attendant grounds and setting of the structure are appropriate in terms of architectural treatment, character, scale, and form, and is not detrimental to the special character and integrity of the structure and its setting, save to the extent necessary to provide for strategic infrastructure projects including but not restricted to the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner Relief Road and Greenways. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.

AH-P-8 Ensure high quality architectural design of all new development relating to or which may impact on NIAH structures (and their setting) save to the extent necessary to provide for strategic infrastructure projects including but not restricted to the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner Relief Road and Greenways. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.

### 14.1.3.4.3 **Vernacular Architecture and Historic Traditional Building Stock**

## Policies

AHP-9 Seek to protect, conserve and preserve vernacular structures, historic building stock and enhance the established character, forms, material features, and settings of vernacular buildings and historic building stock that are considered to be intrinsic elements of the character of a place, save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner Relief Road and Greenways., including:

- a. Vernacular and traditional style farmhouse buildings including Clachans and local authority labourer's cottages.
- b. Vernacular buildings, groupings of buildings on Donegal's Islands.
- c. Historic thatch structures as a key component of the built heritage of the county.
- d. Historic Building Stock such as traditionally stone built buildings.

This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.

AHP-10 Seek to ensure that conversions or extensions to vernacular buildings and the provision of new adjoining buildings/traditional historic building stock shall be of a scale and form that complements the existing building and ensures that the distinctiveness and character of the vernacular form is retained and respected.

### 14.1.3.4.4 **Archaeological Heritage**

## Objectives

AYH-O-1 To conserve and protect archaeological heritage, achieve a greater public knowledge and appreciation of archaeology, protect existing access to, and where appropriate provide new access and visitor infrastructure for, such heritage.

## Policies

### AYHP-1

a. conserve and protect all forms of archaeological heritage including:

- i. National Monuments,
- ii. Structures on the Record of Historic Monuments (RHM),
- iii. the Record of Monuments and Places (RMP),
- iv. Sites and Monument Record (SMR),
- v. Historic Graveyards and environs,
- vi. Historic Towns,
- vii. Historic battlefield sites,
- viii. Unrecorded archaeology,
- ix. Industrial and post-medieval archaeology;
- x. Underwater archaeology and
- xi. The settings of such heritage

in accordance with the publication Framework and Principles for the Protection of Archaeological Heritage (DoAHGI 1999); and

b. Conserve and Protect Zones of Archaeological Protection located in Urban areas of Ballyshannon, Donegal Town, Killybegs, Lifford, Ramelton, Rathmullan and St. Johnston as identified in the Record of Monuments and Places including requiring the carrying out of an archaeological assessment prior to the granting of permission and the undertaking of additional archaeological mitigation where required (e.g. more extensive testing, excavation or licensed archaeological monitoring) to inform the planning application or, if appropriate, the imposition of similar archaeological mitigation (more extensive testing, excavation or licensed archaeological monitoring) as conditions of planning.

The policy will be implemented save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal the Bridgend to County border project scheme, the Buncrana Inner Relief Road and Greenways, subject to such projects being in accordance with all relevant statutory and regulatory provisions or where no statutory or regulatory provisions apply in so far as the policy provisions can be practicably and reasonably achieved within the context of such projects.

AYH-P-2 Protect existing access to, and facilitate appropriate new public access, informational and visitor infrastructure for, archaeological heritage (including signage, parking, pedestrian access, commemorative memorials, and interpretative facilities) where such development would not be detrimental to the character or setting of said heritage where statutory consent has been obtained from the National Monuments Service and where the development would not otherwise negatively impact on traffic safety, local residential amenities, natural environment or the visual or scenic amenities of the area. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of Strategic Infrastructure Projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner Relief Road and Greenways.

AYH-P-3 Ensure that development proposals affecting archaeological heritage sites shall:

- a. Sensitively incorporate archaeological heritage Preserved In Situ in a manner which is compatible with the protection and proper management of such heritage and its setting including adequate safeguards from damage/vandalism and for public safety and suitable informational signage.
- b. Be accompanied by a long-term management plan that incorporates appropriate protections for the heritage site.
- c. Provide appropriate informational signage regarding any archaeological heritage which has been identified and Preserved by Record during the course of construction to an agreed standard with Donegal County Council and the National Monuments Service.

The policy will be implemented save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Buncrana Inner Relief Road and Greenways subject to such projects being in accordance with all relevant statutory and regulatory provisions or where no statutory or regulatory provision applies in so far as the policy provisions can be practicably and reasonably achieved within the context of such projects.

AYH-P-4 Ensure that historic graveyards in the ownership or care of the Council are managed and maintained in accordance with legislation, appropriate/best conservation standards, in consultation with the National Monuments Service and the Department of Housing Local Government and Heritage.

#### 14.1.3.5 **Derry City & Strabane District Council Local Development Plan (LDP) 2032**

Derry City & Strabane District Council adopted the Derry City & Strabane District Council Local Development Plan (LDP) 2032 - Plan Strategy on 10th July 2025. The purpose of the Derry City and Strabane District LDP, is to inform the general public, statutory authorities, developers and other interested bodies of the policy framework and land use proposals that will implement the strategic objectives of the Regional Development Strategy and guide development decisions within Derry City and Strabane District up to 2032. The LDP will comprise two separate documents, The Plan Strategy and The Local Policies Plan, that will shape development within the District over the period to 2032.

The adopted LDP Plan Strategy was consulted for strategies and objectives pertaining to archaeology, architecture and built heritage.

The LDP Plan Strategy states the following in relation to same:

*‘The LDP strategy in relation to our District’s historic environment is to protect, conserve and where appropriate, enhance our assets, while promoting sustainable development. The Council proposes policies to protect and manage development in relation to our listed buildings, monuments, archaeology and historic designed landscapes, as well as facilitating the re-use of our non-designated heritage assets including unlisted vernacular buildings. Policies will manage development within the five conservation areas whilst a number of new areas of townscape /village character will be identified at LPP stage, with appropriate policies to manage their development.’*

It also details the following policies in relation to archaeology and built heritage, including listed buildings:

#### HE 1 Archaeological Remains of Regional and Local Importance

##### (a) Archaeological Remains of Regional Importance

Planning permission will not be permitted where a development proposal would adversely affect archaeological remains of Regional importance such as Monuments in State Care, Scheduled Monuments and Areas of Significant Archaeological Interest (ASAI). Development which would adversely affect such sites or the integrity of their settings must only be permitted in exceptional circumstances.

##### (b) Archaeological Remains of Local Importance

Planning permission will not be granted for a development proposal which would adversely affect archaeological remains of local importance or their settings unless the Council, having consulted the Historic Environment Division, considers that the need for the proposed development or other material considerations outweigh the value of the remains and or their setting.

#### HE 2a Archaeological Assessment and Evaluation

Planning Permission will not be granted where the impact of a development on important archaeological remains are unclear, or the relative importance of the remains is uncertain. The Council will require developers to provide further information in the form of an archaeological assessment or an archaeological evaluation. Where such information is requested but not provided, a precautionary approach will be adopted and Planning Permission will be refused.

#### HE 2b Archaeological Mitigation

Where Planning permission is granted for development which will affect sites known or likely to contain archaeological remains, the Council will impose conditions to ensure preservation in-situ, or licensed excavation, recording and archiving of the archaeology before development commences.

#### HE 3 Development adjacent to the Walls

Planning Permission will not be granted for a development near to or within sight of the Walls that would adversely affect the Monument or integrity of its setting. The Council will carefully control the demolition of properties located against, overlooking or opening onto the Monument. A compelling case will need to be demonstrated that a proposed demolition will be to the ultimate benefit and enhancement of the Monument.

#### HE 4 Listed Buildings and their Settings

All proposals affecting a Listed Building must ensure the works protect, conserve and where possible, enhance the heritage asset. All proposals must be based on a clear understanding of the importance of the heritage asset and should support the best viable use that is compatible with the fabric, setting and essential character of the building.

(a) Change of Use of a Listed Building Planning Permission will be granted, in consultation with the relevant statutory authority, where the change of use secures its upkeep and survival, and the essential character and special architectural or historic interest of the building.

(b) Extensions and Alterations to a Listed Building Planning permission will only be granted, in consultation with the relevant statutory authority for development proposals, for the extension and alteration of a listed building where the following criteria are met:- The essential character of the building and its setting are retained and its features of special interest remain intact and unimpaired;- The works proposed make use of traditional and / or sympathetic building materials and techniques which match or are in keeping with those found on the building; and- The architectural details (e.g. doors, gutters, windows) match or are in keeping with the building.

(c) The Control of Advertisements on a Listed Building Advertisement Consent will only be granted, in consultation with the relevant statutory authority, for advertisements and signs on a listed building where they are carefully designed and located to respect the architectural form and detailing of the building and meets the requirements of the strategic policy in the Signage & Outdoor Advertising chapter.

(d) Demolition of a Listed Building There will be a presumption in favour of retaining Listed Buildings. The Council, in consultation with the relevant statutory authority, will not permit the total demolition or any significant part of a listed building unless there are exceptional reasons why the building cannot be retained in its original or a reasonably modified form. Where, exceptionally, Listed Building Consent is granted for demolition, this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements for recording before its demolition.

(e) Development Affecting the Setting of a Listed Building Planning Permission will only be granted, for a development proposal which would not adversely affect the setting of a listed building, assessed in consultation with the relevant statutory authority. Development proposals will normally only be considered appropriate where all the following criteria is met:- The detailed design respects the listed building in terms of scale, height, massing and alignment;- The works proposed make use of traditional or sympathetic building materials and techniques which respect those found on the building; and- The nature of the use proposed respects the character of the setting of the building.

#### HE 5 Conservation Areas

##### (a) New Development

New development within or affecting the setting of a Conservation Area Planning Permission will be granted for a proposal that enhances the character or appearance where the opportunity to do so exists or to preserve its character or appearance where an opportunity to enhance does not arise. Any proposal for new development in or adjacent to a Conservation Area should:- be sympathetic to the characteristic built form and open spaces within the Conservation Area; - respect the characteristics of adjoining buildings in the area by way of its scale, form, materials and detailing;- not result in environmental problems such as noise, nuisance or disturbance;- protect important views within, into and out of an area;- protect trees and other landscape features contributing to the character or appearance of the area;- protect the Conservation Area public realm – including street furniture, light fixtures and traditional paving surfaces and patterns; - conform with the guidance set out in the Conservation Area design guides

(b) Demolition in a Conservation Area The Council will normally only permit the demolition of an unlisted building in a Conservation Area where the building makes no material contribution to the character or appearance of the area. The general presumption against demolition will only be relaxed in exceptional circumstances where it is considered to be outweighed by other material considerations grounded in the public interest. Where Conservation Area consent for demolition is granted, this will normally be conditional on prior agreement for the redevelopment of the site and appropriate arrangements for recording the building before its demolition.

(c) The Control of Advertisements in a Conservation Area The Council will not normally grant consent for the display of an advertisement in or close to a Conservation Area which would adversely affect the

character, appearance or setting of the area or which would be detrimental to public safety in accordance with Chapter 14: Signs & Outdoor Advertising.

**HE 7 Historic Parks, Gardens, Demesnes and their Settings** The Council will not normally permit development which would lead to the loss of, or cause harm to, the character, principal components or setting of parks, gardens and demesnes of special historic interest. Where Planning Permission is granted, this will normally be conditional on the recording of any features of interest which will be lost before development commences.

#### **HE 8 Conversion and Re-use of Non-Designated Heritage Assets**

The Council will permit the sympathetic conversion and re-use of non-designated heritage assets (NDHAs), such as an unlisted vernacular building or historic building of local importance to other appropriate uses, where this would secure their upkeep and retention, while ensuring no harm or loss to the significance of the heritage asset. Proposals for conversion will normally be required to meet all the following criteria:

- (a) The building is of permanent construction, structurally sound and capable of conversion;
- (b) The scheme of conversion will not have an adverse effect on the character or appearance of the locality and maintains or enhances the form, character and architectural features, design and setting of the existing building. This will involve retention of existing door and window openings and minimising the number of new openings. Details such as door and window design, external surfaces, rainwater goods and means of enclosure should be of a traditional or sympathetic design and materials;
- (c) The new use would not cause unacceptable adverse effects on the amenities of nearby residents or other land uses;
- (d) Any new extensions are modest in size relative to the existing building, is visually subservient to it, does not harm the character or appearance of that building and uses sympathetic design, details and materials; and
- (e) Access and other necessary services are provided without adverse impact on the character of the locality.

Exceptionally, consideration may be given to the sympathetic conversion of a traditional non-residential building to provide more than one dwelling where the building is of sufficient size; the scheme of conversion involves minimal intervention; and the overall scale of the proposal and intensity of use is considered appropriate to the locality.

#### **HE 9 Enabling Development**

The Council will only permit proposals involving enabling development relating to the re-use, restoration or refurbishment of significant historic places where it is demonstrated by the applicant in a submitted Statement of Justification to accompany an application for Planning permission, that all of the following criteria are met:

- a. the significant historic place to be subsidised by the proposed enabling development will bring significant long-term benefits according to its scale and location;
- b. the conservation of the significant historic place would otherwise be either operationally or financially unviable;
- c. the impact of the enabling development is precisely defined at the outset;
- d. the scale of the proposed enabling development does not exceed what is necessary to support the conservation of the significant historic place. The setting and any potential visual impact of the proposed enabling development will be important considerations;
- e. sufficient subsidy is not available from any other source; and
- f. the public benefit decisively outweighs the dis-benefits of setting aside other Planning policy.
- g. it will not materially harm the heritage interests of the significant historic place or its setting;
- h. it avoids detrimental fragmentation of the management of the significant historic place;
- i. it will secure the long-term future of the significant historic place and, where applicable, through sympathetic schemes for their appropriate re use; and

j. it is necessary to resolve problems arising from the inherent needs of the heritage asset, rather than circumstances of the present owner, or the purchase price paid.

#### 14.1.4 Scoping and Consultation

The scope for this chapter of the EIAR has also been informed by consultation with statutory consultees, bodies with environmental responsibility and other interested parties. This consultation process and the List of Consultees is outlined in Section 2.9 of this EIAR. Matters raised by Consultees in their responses with respect to cultural heritage are summarised in Table 14-1 below.

Table 14-1 Summary of scoping response

| Consultee                                                                             | Description                                                                                                                                                                                                                                                                                                                                                                                                                   | Addressed in Section                           |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| National Monuments Service,<br>Department of Housing Local<br>Government and Heritage | An Archaeological Impact Assessment should be carried out at an early stage of planning and design. The AIA must incorporate all lands on which development may be proposed, including but not limited to, access areas, haul roads, temporary compounds, borrow areas, cable array/connection routes, etc. The AIA must include an assessment of the possible effects of the proposal on the wider archaeological landscape. | Section 14.1.4.2 and<br>Throughout Chapter 14. |

##### 14.1.4.1 Donegal County Council

No scoping response specifically relating to archaeology, architectural or cultural heritage has been received from Donegal County Council.

##### 14.1.4.2 Department of Housing Local Government and Heritage

The following response was received from the Development Applications Unit (DAU) on foot of the scoping request issued to the Department of Housing, Local Government and Heritage (DHLGH):

*‘Archaeology*

*The Department of Housing has reviewed the supplied Environmental Impact Assessment Scoping Report for the proposed Meenbog Wind Farm, County Donegal. The information provided was not sufficiently detailed to allow for a full assessment of the archaeological implications of this proposal. However, the Department notes that an Archaeological Impact Assessment (AIA) is scoped into the proposed Environmental Impact Assessment (EIA) process, as part of the overall Cultural Heritage Impact Assessment of the proposed development, and that it will be carried out by a suitably qualified Consultant Archaeologist. The supplied methodology indicates that this will incorporate a detailed desktop study and field inspection.*

*Planning & Design*

*In order to assess the impacts of this extensive wind farm development, this Department recommends that Archaeological Impact Assessment should be carried out at an early stage of planning and design. The AIA must incorporate all lands on which development may be proposed, including but not limited*

*to, access areas, haul roads, temporary compounds, borrow areas, cable array/connection routes, etc. The AIA must include an assessment of the possible effects of the proposal on the wider archaeological landscape. It is of importance that the study area for the AIA should be of sufficient size and extent to support this.*

*The Archaeological Impact Assessment must include:*

*A baseline archaeological and historical study comprising site inspection/s by a suitably qualified Archaeologist and documentary research including reviews of historical, cartographic and aerial photography sources.*

- *Walkover surveys and field inspections.*
- *An Archaeological/Historic Landscape study.*
- *Visual Impact Assessment.*
- *The desk-study and field inspection regime should inform:*
  - *Targeted non-intrusive advance geophysical survey or prospection (such as Ground Penetrating Radar Surveys).*
  - *Targeted advance archaeological test excavation.*
- *Any and all intrusive advance investigations (such as, but not limited to, ground investigations for soils/geology/hydrogeology) carried out as part of the EIA or design process should be subject to a programme of archaeological monitoring by a suitably qualified archaeologist.*

*Comprehensive assessment is required in order to fully characterise the archaeological potential of the lands proposed for development and allow a clear and comprehensive archaeological impact statement to be made. The results of these investigations should inform the EIA process and be incorporated within the EIA Report. The Department is happy to provide further advice and clarification as and if required in relation to the preparation of suitably comprehensive assessments as outlined above, with particular regard to the scope and locations for any advance non-intrusive prospection or advance test excavation that would be appropriate to inform the assessment of this proposed scheme.'*

This Cultural Heritage Chapter comprises an Archaeological Impact Assessment as referred to in the DAU scoping response. The assessment is inclusive of walk-over surveys and field inspections, archaeological/historical landscape studies and visual impact assessment. As ground works for the Subject Development are largely complete it is not considered that geophysical survey or advance archaeological test excavation are appropriate or necessary assessment techniques in this instance for the assessment of the Prospective Development. Archaeological monitoring of ground works associated with the Existing Development was carried out (Delany 2023) and did not result in the uncovering of any archaeological finds or features (see Section 14.3.1.1.4 below). A copy of the Delany (2023) archaeological monitoring report is included as Appendix 14-2 of this EIAR.

## 14.2 Assessment Methodology

The assessment of the Cultural Heritage of the Prospective Development included geographic information system (GIS) mapping, desk-based research and field inspection. See Section 14.2.5.2 below for methodology regarding assessment of indirect (visual) effects.

### 14.2.1 Geographical Information Systems (GIS)

GIS is a computer database which captures, stores, analyses, manages and presents data that is linked to location. GIS is geographic information systems which includes mapping software and its application with remote sensing, land surveying, aerial photography, mathematics, photogrammetry, geography and tools that can be implemented with GIS software. GIS was used to manage the datasets relevant to the archaeological and architectural heritage assessment and for the creation of all the maps in this section of the report. This involved the overlaying of the relevant archaeological and architectural datasets on

georeferenced aerial photographs and road maps (i.e. Economic and Social Research Institute (ESRI)), where available. The integration of this spatial information allows for the accurate measurement of distances of a proposed development from archaeological and cultural heritage sites and the extraction of information on 'monument types' from the datasets. Areas of archaeological or architectural sensitivity may then be highlighted in order to mitigate the potential negative effects of a development on archaeological, architectural and cultural heritage.

## 14.2.2 Desktop Assessment

The desktop assessment for the Prospective Development involved the consultation of, but was not limited to, the following sources:

- UNESCO World Heritage Sites Ireland (<https://whc.unesco.org/en/statesparties/ie/>)
- The Record of Monuments and Places (RMP) County Donegal
- The Sites and Monuments Record (SMR) County Donegal
- The Sites and Monuments Record NI (NISMR)
- National Monuments in State Care County Donegal
- Monuments Subject to a Preservation Order County Donegal
- The Topographical Files of the National Museum of Ireland
- First edition Ordnance Survey maps (Tailte Éireann)
- Second edition Ordnance Survey maps (Tailte Éireann)
- Third edition Ordnance Survey maps (Tailte Éireann)
- Aerial photographs (copyright of Tailte Éireann)
- Excavations Database
- National Inventory of Architectural Heritage (NIAH)
- Record of Protected Structures
- Donegal County Development Plan 2024-2030
- Derry City & Strabane District Council Local Development Plan (LDP) 2032
- Cultural Heritage Chapter of 2017 EIAR
- Report on Archaeological Monitoring of a Windfarm Development at Meenbog, County Donegal (Delany, 2023) (Archaeological Monitoring of the Existing Development)

### 14.2.2.1 Record of Monuments and Places, Sites and Monuments Record, Sites and Monuments Record NI and National Monuments

A primary cartographic source and base-line data for the assessment was the consultation of the Sites and Monuments Record (SMR) and Records of Monuments and Places (RMP) for County Donegal and the Sites and Monuments Record for Northern Ireland (NI SMR). All known recorded archaeological monuments are indicated on 6-inch Ordnance Survey (OS) maps and are listed in these records. The SMR/RMP is not a complete record of all monuments as newly discovered sites may not appear in the list or accompanying maps. In conjunction with the consultation of the SMR and RMP the electronic database of recorded monuments and SMRs (ROI) which may be accessed on the Historic Environment Viewer (HEV) at [www.heritagedata.maps.arcgis.com](http://www.heritagedata.maps.arcgis.com) was also consulted.

A review of all National Monuments in State Care and those subject to Preservation Orders in Donegal was also undertaken as part of the assessment.

#### 14.2.2.2 Cartographic Sources and Aerial Photography

Cartographic sources were consulted as part of the assessment, where available, as was Tailte Éireann aerial photography, Google Earth imagery and MapGenie imagery. The following cartographic sources were consulted:

- Down Survey barony maps (1656-8) (<https://downsurvey.tchpc.tcd.ie/>, accessed 9<sup>th</sup> March 2026)
- First (1829-41), second (1897-1913) and third (1830s -1930s) edition Ordnance Survey (OS) maps (Tailte Éireann)

#### 14.2.2.3 Topographical Files - National Museum of Ireland

Details relating to finds of archaeological material and monuments in numerous townlands in the country are contained in the topographical files held in the National Museum of Ireland. In order to establish if any new or previously unrecorded finds had been recovered from the Site these files, as available on Heritage Maps ([www.heritagemaps.ie](http://www.heritagemaps.ie)), were consulted for each townland within and immediately adjacent to the Site (accessed 9<sup>th</sup> March 2026).

#### 14.2.2.4 Archaeological Inventory Series

Information on archaeological sites is contained in the published County Archaeological Inventory series prepared by the Department of Housing, Local Government and Heritage (DHLGH). The archaeological inventories present summarised information on sites listed in the SMR/RMP and include detail such as the size and location of particular monuments, as well as any associated folklore or local information pertaining to each site. The inventories, however, do not account for all sites or items of cultural heritage interest which are undiscovered at the time of their publication. Many sites have been discovered since the publication of the Inventory Series, which have now been added to the Sites and Monuments Record. The information contained within the Archaeological Inventory Series is the basis for the monument descriptions as provided on the HEV and was therefore accessed on the HEV.

#### 14.2.2.5 Record of Protected Structures

The DCDP was consulted for the schedule of buildings (Record of Protected Structures) and items of cultural, historical or archaeological interest which may be affected by the Prospective Development. The dataset for the Donegal Record of Protected Structures was added to the base mapping for the Prospective Development in order to accurately assess any potential effects on such structures.

#### 14.2.2.6 Excavations Database

The Excavations Database is an annual account of all excavations carried out under license. The database is available online at [www.excavations.ie](http://www.excavations.ie) and includes excavations from 1985 to 2026. This database was consulted as part of the desktop research for this assessment to establish if any archaeological excavations had been carried out within or near to the Site.

#### 14.2.2.7 National Inventory of Architectural Heritage (NIAH)

This source lists some of the architecturally significant buildings and items of cultural heritage and is compiled on a county-by-county basis by the DHLGH. The NIAH database was consulted for all townlands within and adjacent to the Site. The NIAH survey has been published and the digital dataset was downloaded on to the base mapping for the Prospective Development ([www.buildingsofireland.ie](http://www.buildingsofireland.ie)). The NIAH is a state initiative under the administration of the DHLGH and established on a statutory

basis under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999.

The purpose of the NIAH 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 the Department of Culture, Heritage and the Gaeltacht to the planning authorities for the inclusion of particular structures in their Record of Protected Structures (RPS).

#### 14.2.2.8 Previous Assessments

The Wind Farm Site and Grid Connection Site were the subject of a cultural heritage assessment which was carried out by Tobar Archaeological Services as part of the 2017 EIAR for the Permitted Development. The assessment included desk-based research and a walk-over survey of the Wind Farm Site and Grid Connection Site which was undertaken in 2015 and 2017 (<https://www.pleanala.ie/en-ie/case/300460>).

#### 14.2.3 Field Inspection

As outlined above, the Wind Farm Site and Grid Connection Site were subject to a walk-over survey in 2015 and 2017 as part of the assessment carried out for the 2017 EIAR. As part of the walk-over survey a photographic and descriptive record was made of the Wind Farm Site and Grid Connection Site and any features of interest therein. The Wind Farm Site was again inspected in December 2025 by Miriam Carroll of Tobar Archaeological Services Ltd. This involved a visual inspection of the Wind Farm Site and a photographic record of same (See Appendix 14-1). No previously unrecorded potential archaeological monuments or structures were noted within the Wind Farm Site or Grid Connection Site during the walk-over surveys carried out by Tobar Archaeological Services Ltd in 2015 and 2017. No such potential sites or structures were identified during the subsequent 2025 site inspection of the Wind Farm Site. Similarly, no potential archaeological finds or features were exposed during archaeological monitoring of ground works associated with the construction of the Existing Development (See Section 14.3.2.1.4 for further detail). The BMEP Site is densely forested and therefore was not conducive to a walk-over survey (See Section 14.2.4.1 below).

#### 14.2.4 Limitations Associated with the Assessment

##### 14.2.4.1 Field Assessment

The BMEP Site is densely forested and therefore was not conducive to a walk-over survey. Mitigation measures are proposed for forested areas (See Section 14.3.1.3 and Section 14.4 below). Access to all relevant areas of the Wind Farm Site for the purposes of a visual inspection was carried out. It should be noted, however, that Meenbog Wind Farm is partly constructed with the majority of internal site roads, hardstands and borrow pits in place. The field survey undertaken in 2015/2017 and in 2025 in addition to previous archaeological monitoring of ground works associated with the construction of the Existing Development has allowed for a satisfactory inspection of the Wind Farm Site and Grid Connection Site for the purposes of this assessment.

##### 14.2.4.2 Desktop Assessment

No significant limitations were encountered during the desktop assessment.

## 14.2.5 Assessment of Likely Significant Effects

The likely effects on the existing archaeological, architectural and cultural heritage environment are assessed using the criteria as set out in the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (EPA, 2022) and described in section 1.7.2 of Chapter 1. The following terminology is used when describing the likely effects of the Prospective Development from a Cultural Heritage perspective.

### 14.2.5.1 Types of Effect

- Direct effects arise where an archaeological heritage feature or site is physically located within the footprint of the development whereby the removal of part, or all of the feature or site is thus required.
- Indirect effects may arise as a result of subsurface works undertaken outside the footprint of the development, secondary environmental change such as a reduction in water levels and visual effects.
- Cumulative effects arise when the addition of many effects create a larger, more significant effect.
- Residual effects are the degree of environmental changes that will occur after the proposed mitigation measures have been implemented.

#### 14.2.5.1.1 Magnitude of Effects (Significance)

- Profound: Applies where mitigation would be unlikely to remove adverse effects. Reserved for adverse, negative effects only. These effects arise where an archaeological site is completely and irreversibly destroyed.
- Very Significant: An effect which by its character, magnitude, duration or intensity significantly alters most of the sensitive aspect of the environment.
- Significant: An effect which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment. An effect like this would be where part of a site would be permanently impacted upon, leading to a loss of character, integrity and data about an archaeological site.
- Moderate: A moderate effect arises where a change to an archaeological site is proposed which though noticeable, is not such that the integrity of the site is compromised and which is reversible. This arises where an archaeological site can be incorporated into a modern day development without damage and that all procedures used to facilitate this are reversible.
- Slight: An effect which causes changes in the character of the environment which are not high or very high and do not directly impact or affect an archaeological site.
- Not Significant: An effect which causes noticeable changes in the character of the environment but without significant consequences.
- Imperceptible: An effect on an archaeological site capable of measurement but without noticeable consequences.

### 14.2.5.2 Cultural Heritage Receptors Considered

For the purposes of this assessment the following Cultural Heritage receptors were considered:

- UNESCO World Heritage Sites and those on the Tentative List
- National Monuments (State Care, Ownership or Guardianship) and those subject to a Preservation Order
- Recorded monuments (SMR/NI SMR/RMP)
- Protected Structures
- Listed Buildings (NI)

- Industrial Heritage (NI)
- NIAH Structures and Historic Gardens
- Items of local cultural heritage merit

#### 14.2.5.2.1 **Sensitivity of Receptors**

Rating the importance or sensitivity of cultural heritage receptors relies on the judgment of the Cultural Heritage Professional and may be subjective. A number of factors may be taken into consideration when determining the sensitivity of a receptor such as whether it is of International, National, Regional or local significance, its state of preservation, designation, etc. It should be noted, however, that not all receptors may have a statutory designation or designated significance (i.e. International, National, Regional, Local) therefore all receptors are considered on their own merits in the context of the information available at the time of the assessment and may be subject to change. The following sensitivity of receptors was determined for this assessment (Table 14-2) and is with regard to guidance contained within Guidelines for Cultural Heritage Impact Assessment of TII National Road and Greenway Projects (TII September 2025).

Table 14-2: Sensitivity of Cultural Heritage Receptors Considered

| Cultural Heritage Asset/Receptor                                  | Sensitivity |
|-------------------------------------------------------------------|-------------|
| UNESCO World Heritage Sites (including tentative sites)           | Very High   |
| National Monuments (State Ownership and Preservation Order Sites) | Very High   |
| SMR/NI SMR/RMP                                                    | Medium-High |
| Protected Structures/Listed Buildings NI                          | Medium-High |
| Industrial Heritage NI                                            | Medium-Low  |
| NIAH structures and Historic Gardens                              | Medium-Low  |
| Undesignated items of local cultural heritage merit               | Low         |

#### 14.2.5.3 **Methodology for the assessment of effects on visual setting (indirect effects)**

A standardised approach was utilised for the assessment of effects of visual setting (indirect effects) according to types of monuments and cultural heritage assets which may have varying degrees of sensitivity. This assessment does not include visits to each and every site as this is considered to be beyond the scope of this EIAR as they are mainly located on private lands to which the public have no access. The assessment of effects on visual setting was undertaken using both the Zone of Theoretical Visibility (ZTV) map in the Landscape and Visual Impact Assessment (LVIA), as presented in Chapter 14 of this EIAR, and also photomontages from relevant locations. The analysis used in the assessment of potential effects on the visual setting of cultural heritage assets in the wider landscape of 5km, 10km and 20km considers the effects of the proposed turbines. The tall, vertical nature of the proposed turbines make them the most prominent elements of the Prospective Development from a visual perspective and have the most potential to give rise to significant, indirect, effects.

Other components of the Prospective Development such as roads, tracks, construction compounds, etc are not deemed to be as visually prominent as the proposed turbines.

The proposed 80m meteorological (met) mast is also a tall vertical structure, thus it is fully considered throughout this chapter. It will, however, be substantially less visible than any turbine given its shorter and slender lattice form.

The existing onsite 110kV substation, while not as visually prominent as the proposed turbines, is also considered when assessing potential visual effects.

While direct physical effects to a site or monument can easily be assessed in quantitative terms, the assessment of effects on setting can be subjective and as such is a matter of qualitative, professional judgement and experience. The distances outlined in Table 14-3 used in the assessment of effects on setting are regarded as appropriate and are based on professional judgement.

Table 14-3: Distance considered from the proposed turbines to cultural heritage assets according to sensitivity

| Cultural Heritage Asset                                           | Distance Considered from the proposed turbines |
|-------------------------------------------------------------------|------------------------------------------------|
| UNESCO World Heritage Sites (including tentative sites)           | 20km                                           |
| National Monuments (State Ownership and Preservation Order Sites) | 10km                                           |
| Sites and Monuments and Recorded Monuments, RPS                   | 5km                                            |
| NIAH structures                                                   | 5km                                            |
| Undesignated sites, if relevant                                   | 500m                                           |

The **potential** visual effects of the proposed turbines on the setting of other cultural heritage assets such as recorded monuments are graded according to two criteria (Table 14-4):

- Distance to the nearest proposed turbine:** Each increment of distance is numbered from 1-5 in severity with 1 being the lowest in severity (i.e. 4-5km from the nearest proposed turbine and 5 being the most severe (0-1km from the nearest turbine).
- Number of proposed turbines visible on ZTV.** Each increment is also numbered from 1-4 with 1 being the least severe (i.e. 1-5 turbine visible) and 4 being the most severe (16-19 turbines visible).

The number values are then multiplied to arrive at a potential effect (from Imperceptible to Significant). For the purposes of the Prospective Development there are no Significant effects. Very Significant and Profound are reserved for adverse direct effects which result in the total removal of cultural heritage assets which does not occur from visual effects. The following table is used to ascertain the potential visual effect on Cultural Heritage assets within 5km of the nearest proposed turbine not assuming any vegetation, existing buildings, and any other screening in the landscape.

Table 14-4: Grading of Potential visual effects according to Distance and No. of proposed turbines visible from Cultural Heritage Assets

| No. of Turbines Visible (ZTV) | 1-5 (1)               | 6-10 (2)      | 11-15 (3)        | 16-19 (4)            |
|-------------------------------|-----------------------|---------------|------------------|----------------------|
| Distance of asset to turbine  |                       |               |                  |                      |
| 4-5km (1)                     | 1                     | 2             | 3                | 4                    |
| 3-4km (2)                     | 2                     | 4             | 6                | 8                    |
| 2-3km (3)                     | 3                     | 6             | 9                | 12                   |
| 1-2km (4)                     | 4                     | 8             | 12               | 16                   |
| 0-1km (5)                     | 5                     | 10            | 15               | 20                   |
|                               |                       |               |                  |                      |
| Imperceptible (0)             | Not Significant (1-5) | Slight (6-10) | Moderate (11-15) | Significant (16-20+) |

## 14.3 Existing Environment

### 14.3.1 Archaeological, Architectural and Cultural Heritage

Archaeological heritage includes UNESCO World Heritage Sites and those on the tentative list, National Monuments in State Care and those which are subject to a preservation order, sites listed in the RMP/SMR, newly discovered archaeological sites and potential sub-surface archaeology. Architectural heritage includes Protected Structures, NIAH structures and historic gardens while cultural heritage also includes items not included in the RPS or NIAH which may be indicated on the historic mapping or noted during field survey. Such items may include gate piers, local vernacular architecture, field walls, etc. Each of these are addressed in the following sections.

A number of documentary and cartographic sources (as listed in Section 14.2.2 above) were utilised in order to ascertain the potential for the presence of cultural heritage features on or within the area of the Site. Section 14.3.1.1 addresses the Wind Farm Site, Section 14.3.1.2 addresses the Grid Connection Site, Section 14.3.1.3 addresses the proposed Turbine Delivery Route (TDR) while Section 14.3.1.4 addresses the proposed Biodiversity Management and Enhancement Plan (BMEP) Site.

#### 14.3.1.1 Wind Farm Site

##### 14.3.1.1.1 UNESCO World Heritage Sites and those on Tentative List

No UNESCO World Heritage Sites (WHS) or those on the Tentative list are located within the Wind Farm Site or within 20km of same. The nearest WHS (Tentative list) comprises the Passage Tomb Landscape of County Sligo which is situated c.61km to the south-west. Given the considerable distance between the Wind Farm Site and the Passage Tomb Landscape of County Sligo it is not considered that potential visual effects to that landscape will occur as a result of the proposed turbines. An assessment of potential effects with regard to the UNESCO Toolkit Guidance (Guidance and Toolkit for Impact Assessments in a World Heritage Context (UNESCO, 2022)) or UNESCO Wind Guidance (Guidance for Wind Energy Projects in a World Heritage Context (UNESCO, 2022)) is not therefore considered necessary.

The central foci of the Carrowmore and Carrowkeel complex are located c. 61km and c. 79km from the Wind Farm Site, respectively.

##### 14.3.1.1.2 National Monuments

National Monuments are those recorded monuments which are in the ownership / guardianship of the Minister for Housing, Local Government and Heritage. They are frequently referred to as being in 'State Care'. National Monuments also include those which are subject to a Preservation Order. In

Northern Ireland State Care sites and monuments are those in the ownership or guardianship of the Department. They represent all periods of human settlement in Northern Ireland from around 7,000 BC to the 20th century. No National Monuments, those subject to a Preservation Order or NI State Care sites are located within the Wind Farm Site or within 10km of the nearest proposed turbine. The nearest monument in State Care (NM No. 174) comprises Donegal Castle which is located over 15km to the south-west of T3. The nearest monument subject to a Preservation Order (PO No. 5/1973) is situated c.11km to the north-east of T19 and consists of a ringfort and souterrain (Figure 14-1). The ZTV demonstrates no theoretical visibility of the proposed turbines from Donegal Castle (NM No. 174) and theoretical visibility of 16-19 proposed turbines from the ringfort and souterrain (PO No. 5/1973) (Figure 14-2).

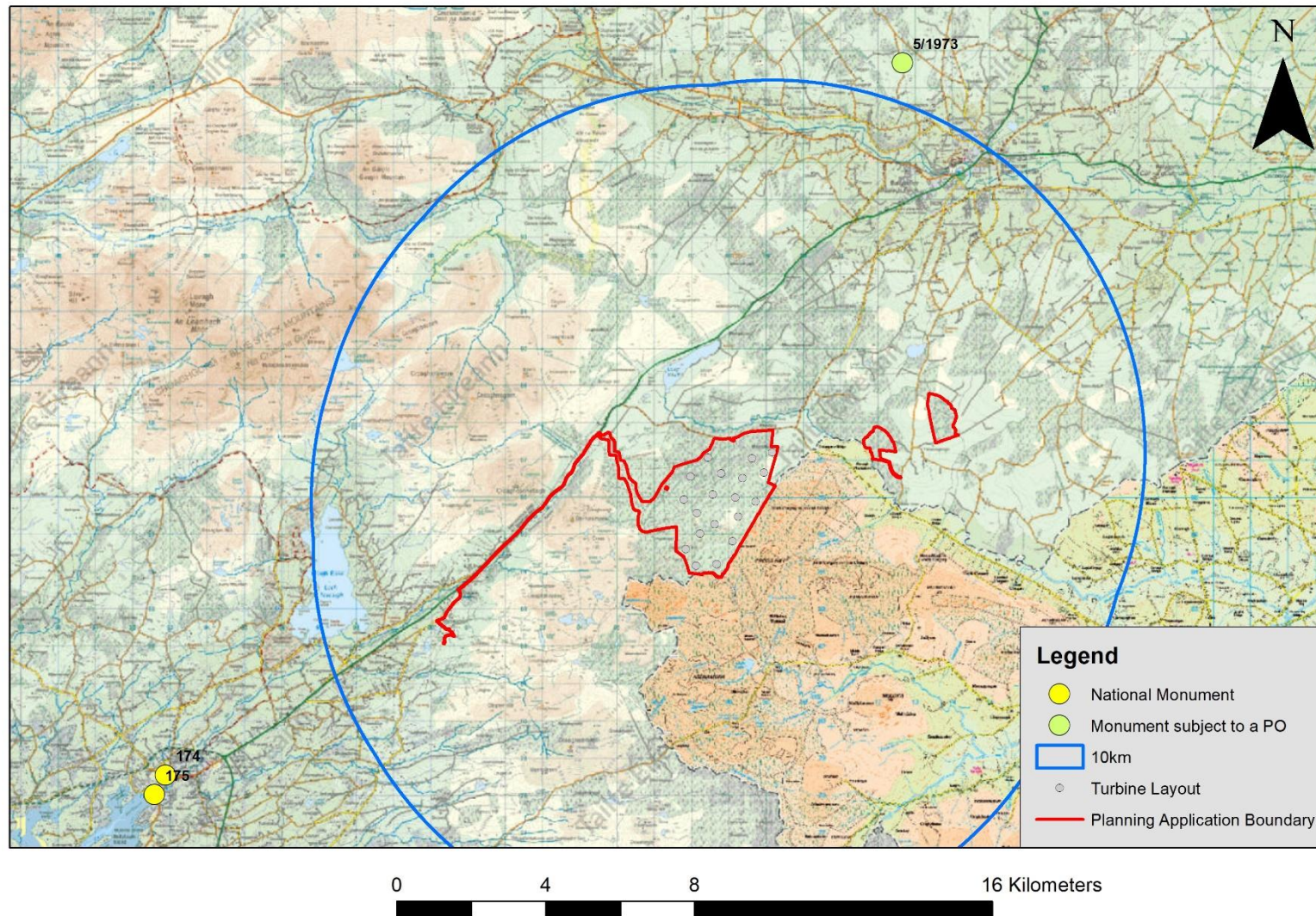


Figure 14-1: Nearest National Monuments and those subject to a Preservation Order in relation to the Prospective Development.

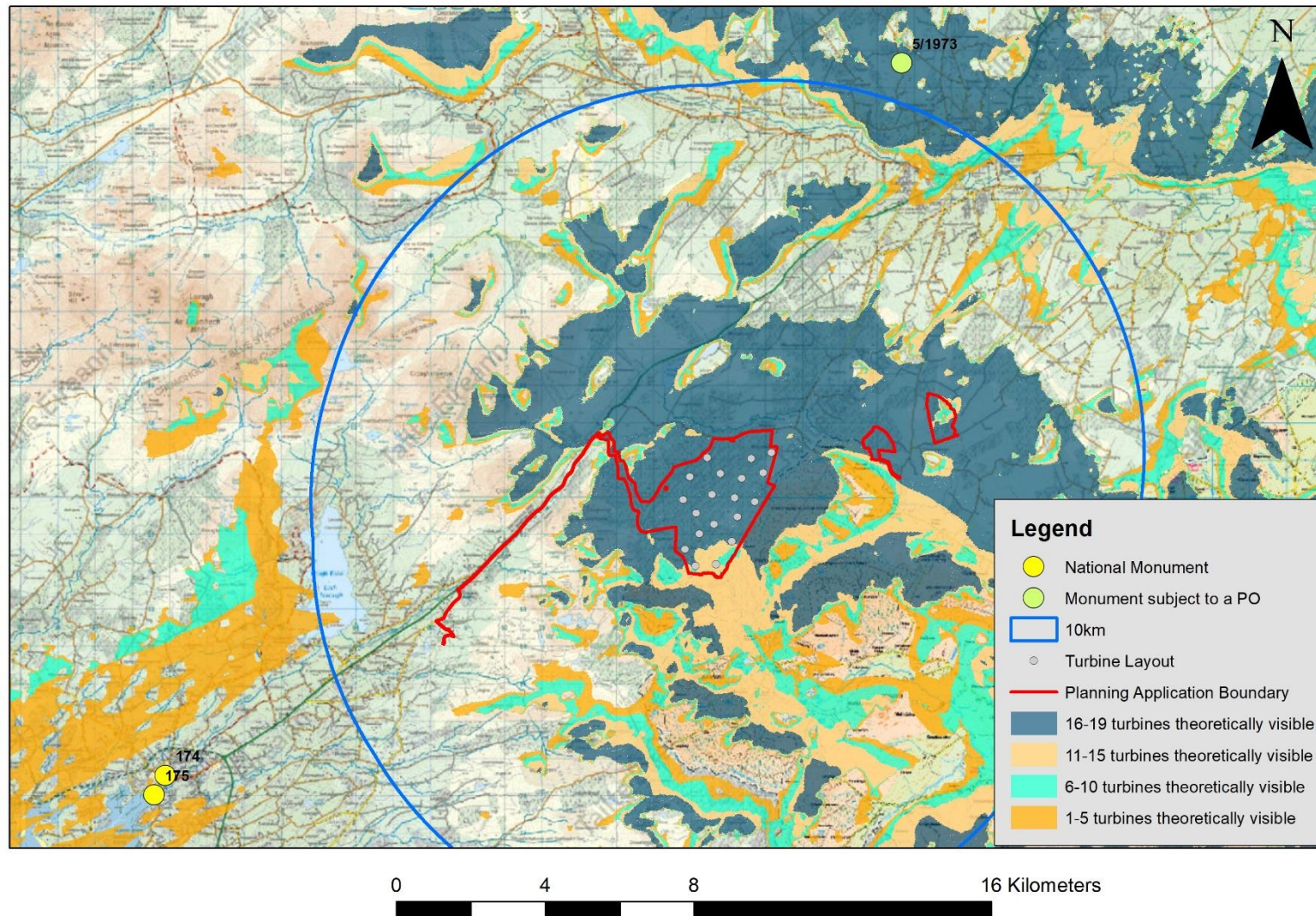


Figure 14-2: Nearest National Monuments and those subject to a Preservation Order in relation to the Prospective Development with ZTV.

#### 14.3.1.1.3 Recorded Monuments within the Wind Farm Site

The dataset for the SMR was downloaded from ArcGIS online and added to the base mapping for this assessment. This Archaeological Survey of Ireland (ASI) dataset is published from the database of the National Monuments Service Sites and Monuments Record (SMR). This dataset also can be viewed and interrogated through the online HEV. GIS software (ArcMap) was then utilised to calculate the number of recorded monuments located within the Wind Farm Site and within 5km of the nearest proposed turbine (see Section 14.3.1.1.6 below).

No recorded monuments are located within the Wind Farm Site.

#### 14.3.1.1.4 Archaeological Investigations within the Wind Farm Site

##### Previous Archaeological Surveys

Walk-over surveys of the Wind Farm Site and the Grid Connection Site were carried out in 2015 and 2017 as part of the assessment carried out for the 2017 EIAR. The walk-over survey comprised a visual inspection of the proposed infrastructure locations by two qualified archaeologists, and a photographic and descriptive record was made of the Wind Farm Site and Grid Connection Site and any features of interest therein. The Wind Farm Site was again revisited in December 2025 as part of this assessment process. No potential archaeological monuments or features of cultural heritage merit were noted within the Wind Farm Site during the walk-over surveys.

##### Archaeological Monitoring of Ground Works

Archaeological monitoring of ground works was carried out during the construction of the Existing Development. The monitoring was undertaken between November 2019 and October 2022 by Dominic Delaney & Associates under Excavation Licence Number: 19E0739, in compliance with Condition No. 17 of the grant of planning permission (Ref. ABP-300460-17). No archaeological finds or features were uncovered during the monitoring (See Excavations Database entry below and Appendix 14-2).

##### Excavations Database

The database of excavations carried out in Ireland ([www.excavations.ie](http://www.excavations.ie)) was consulted for any such licensed work which took place on or adjacent to the Wind Farm Site. One entry was returned for Meenbog and relates to the archaeological monitoring of ground works carried out during the construction of the Existing Development.

A summary of the work as provided on the Database is as follows:

***2020:584 - Meenbog, Donegal***

*County: Donegal Site name: Meenbog*

*Sites and Monuments Record No.: None Licence number: 19E0739*

*Author: Dominic Delany*

*Site type: No archaeology found*

*ITM: E 607502m, N 886075m*

*Archaeological monitoring was carried out during the construction stage of a windfarm development at Meenbog, Co. Donegal, between November 2019 and November 2020. The development involved the construction of 18 turbines, 3 borrow pits, 2 temporary construction compounds, sub-station, met mast, new site roads and upgrades to existing tracks and roads, as well as ducting and ancillary works. There are no recorded monuments, protected structures or items of architectural heritage interest located on the development site. No archaeology was found during monitoring.*

#### 14.3.1.1.5 **Previously Unrecorded Monuments within the Wind Farm Site**

No previously unrecorded archaeological monuments, stray finds or structures were noted within the Wind Farm Site during the previous walk-over surveys. Similarly, no potential archaeological features, deposits or artefacts were uncovered during archaeological monitoring of ground works associated with the construction of Existing Development (see above).

#### 14.3.1.1.6 **Recorded Monuments within 5km of the nearest proposed turbine**

A total of eighteen (18) recorded monuments are located within 5km of the nearest proposed turbine. This number comprises 15 recorded monuments in County Donegal and three monuments (NI SMR) in County Tyrone. The monuments are listed in Table 14-5 and shown on Figure 14-3. The nearest of the monuments TY014:002 comprises a crannog and is located in County Tyrone c. 1.5km south-west of the nearest proposed turbine, T3.

The monuments are grouped according to monument type or period and are discussed accordingly below.

##### **The Prehistoric Period**

At least 10 of the eighteen monuments located within 5km of the nearest proposed turbine date to the prehistoric period and include two megalithic tombs and a megalithic structure, two standing stones, a cairn, a burnt spread and a fulacht fia. Seven of the monuments, including a burial cairn, wedge tomb, fulacht fia, hearths and a burnt spread, are located at Croaghonagh townland and were excavated in advance of the construction of a dam at Lough Mourne (see below).

The megalithic tombs located within 5km of the nearest proposed turbine comprise a wedge tomb (DG086-002004-) and a portal tomb (DG077-021—) which are located c. 3.1km and 4km from the nearest proposed turbines (T18 and T19), respectively. Wedge tombs consist of a long burial gallery, sometimes with an antechamber or small closed end-chamber. They are generally broader and higher at the front, which invariably faces in a westerly direction. They are roofed by slabs laid directly on the side-walls which often have one or more rows of outer- walling. Evidence from the small number of excavated examples suggests that they were being built between 2,500 and 2,000 BC representing the last phase of megalithic tomb building. Portal tombs represent an earlier phase in the megalithic burial tradition and comprise a single, short chamber formed by two tall portal-stones, two sidestones and a backstone. Sometimes a stone between the portals closes the entry. The chamber is covered by a roofstone, often of enormous size, which slopes down from the front towards the rear. Cremation was the preferred burial rite and these monuments date to the Neolithic period from 3800 to 3200 BC. The megalithic structure (DG077-025—) is located c. 4.7km from the nearest proposed turbine, T18. The monument description on the HEV notes that it is not a megalithic tomb and that its function and date are unknown.

Two standing stones are located within 5km of the nearest proposed turbine, the nearest of which is located c. 3.1km from the nearest proposed turbine, T18. Standing stones consist of a stone which has been deliberately set upright in the ground, usually orientated on a north-east-south-west axis, although other orientations do occur, and varying in height from 0.5m up to 6m. They functioned as prehistoric burial markers, commemorative monuments, indicators of routeways or boundaries and date from the Bronze and Iron Ages (c. 2400 BC - AD 500), with some associated with early medieval ecclesiastical and burial contexts (c. 5th-12th centuries).

A burial cairn DG086-002001- is located c. 3.1km to the north of the nearest proposed turbine, T18 in Croaghonagh townland. It, and a number of adjacent monuments, were subject to full archaeological excavation in advance of the development of a dam at Lough Mourne. It was dated to the Neolithic period and activity also dating to this period but pre-dating the construction of the cairn was uncovered

in the form of hearths (DG086-002003-). A burnt spread (DG086-002005-) also formed part of the complex of monuments at Lough Mourne which was subject to full excavation and was interpreted as a hearth.

An adjacent wedge tomb (DG086-002004-) as discussed above, was also subject to full archaeological excavation and testified to the continuity of activity at this site into the Bronze Age. The Bronze Age activity was also represented by a fulacht fia (DG086-002007-) which was also subject to full excavation. Fulacht fia comprise a horseshoe-shaped or kidney-shaped mound consisting of fire-cracked stone and charcoal-enriched soil built up around a sunken trough located near or adjacent to a water supply, such as a stream or spring, or in wet marshy areas. The first recorded use of the Irish term 'fulacht fiadh/fia' (cooking pit of the deer or of the wild) as relating to ancient cooking sites was in the 17th century. They are generally interpreted to have been associated with cooking and date primarily to the Bronze Age (c. 2400-500 BC).

A hilltop enclosure (DG086-001—) is located in Cashelnavean townland, c. 3.3km from the nearest proposed turbine T18. While the precise date of this monument is not known this monument type can date from the prehistoric period through to the early medieval period. Hilltop enclosures comprise an enclosed area less than 2 hectare in size (diam. less than c. 160m) located in upland terrain – on ridges or plateaux, on the lower slopes of hills or mountains, and sometimes encompassing the domed summit of a hill. They are univallate, defined by an earthen bank or wall, sometimes with an external fosse. They are generally considerably larger than ringforts, and may date to any period from prehistory to the late medieval period (i.e. 4000 BC - 1700 AD).

### The Early Medieval Period

The Early Medieval period is represented by enclosures, ringforts - cashels and crannógs which account for at least 6 of the 18 monuments within 5km of the nearest proposed turbine.

Enclosures consist of 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. Enclosures with a diameter greater than 70m should be classed as Large Enclosure. Ringforts are a roughly circular or oval area surrounded by an earthen bank with an external fosse. In the case of cashels the surrounding enclosing element comprises a wall or walls. 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 500 to 1000 AD. Crannógs consist of an island, partly or wholly artificial, built up by dumping timber, earth and stones onto a lake or river bed, often revetted with timber piles or a palisade. Derived from the Irish word 'crannóg'; the Irish word for tree is 'crann' and 'crannóg' principally means a piece of wood or a structure of wood. They date from the 6th to the 17th century AD.

### Monuments with Religious Associations

One monument with religious associations is located within 5km of the nearest proposed turbine and comprises a holy well TYR022:001 which is situated c. 3.4km from the nearest proposed turbine, T2. Holy wells comprise a well or spring, though in some unusual cases a natural rock basin, which usually bears a saint's name and is often reputed to possess miraculous healing properties. These may have their origins in prehistory but are associated with devotions from the medieval period (5th-16th centuries AD) onwards.

The ZTV demonstrates the following theoretical visibility for the 18 recorded monuments. Six of the 18 monuments are located in areas where 16-19 turbines will theoretically be visible. One monument is located in an area where 11-15 turbines will theoretically be visible. Four monuments are located in

areas where 6-10 turbines will theoretically be visible, with five additional monuments located in areas where 1-5 turbines will theoretically be visible. Two recorded monuments are located in areas where none of the proposed turbines will theoretically be visible (Figure 14-4).

Table 14-5: Recorded monuments within 5km of the nearest proposed turbine.

| SMR           | Monument Type                 | ITM E  | ITM N  | Townland       | Turbine ID | Distance (m) |
|---------------|-------------------------------|--------|--------|----------------|------------|--------------|
| TYR014:002    | A.P. SITE - CRANNOG?          | 605464 | 883855 | SLIEVEDOO      | T3         | 1506         |
| TYR014:001    | ISLAND, possibly CRANNOG      | 605131 | 883045 | SLIEVEDOO      | T1         | 2214         |
| DG086-002005- | Burnt spread                  | 607798 | 890178 | CROAGHONAGH    | T18        | 3139         |
| DG086-002002- | Standing stone                | 607737 | 890188 | CROAGHONAGH    | T18        | 3142         |
| DG086-002004- | Megalithic tomb - wedge tomb  | 607747 | 890194 | CROAGHONAGH    | T18        | 3149         |
| DG086-002001- | Cairn - burial cairn          | 607754 | 890203 | CROAGHONAGH    | T18        | 3159         |
| DG086-002003- | Hearth                        | 607754 | 890206 | CROAGHONAGH    | T18        | 3162         |
| DG086-002006- | Pit                           | 607785 | 890203 | CROAGHONAGH    | T18        | 3163         |
| DG086-002007- | Fulacht fia                   | 607751 | 890229 | CROAGHONAGH    | T18        | 3185         |
| DG086-001—    | Hilltop enclosure             | 606074 | 890146 | CASHELNAVEAN   | T18        | 3354         |
| TYR022:001    | HOLY WELL                     | 607595 | 880790 | SLIEVEDOO      | T02        | 3426         |
| DG086-004—    | Enclosure                     | 612592 | 887779 | TIEVECLOGHOGE  | T19        | 3516         |
| DG087-004—    | Ringfort - cashel             | 612947 | 886892 | TIEVECLOGHOGE  | T19        | 3837         |
| DG086-003—    | Enclosure                     | 611721 | 890068 | TRUSK          | T19        | 3865         |
| DG077-021—    | Megalithic tomb - portal tomb | 611077 | 890720 | CARRICKMAGRATH | T19        | 4021         |
| DG077-028—    | Standing stone                | 610306 | 891063 | MEENBOG        | T19        | 4034         |

| SMR        | Monument Type        | ITM E  | ITM N  | Townland     | Turbine ID | Distance (m) |
|------------|----------------------|--------|--------|--------------|------------|--------------|
| DG077-025— | Megalithic structure | 605269 | 891263 | LOUGHSALLAGH | T18        | 4708         |
| DG077-014— | Ringfort - cashel    | 609863 | 892026 | GOLAND       | T19        | 4876         |

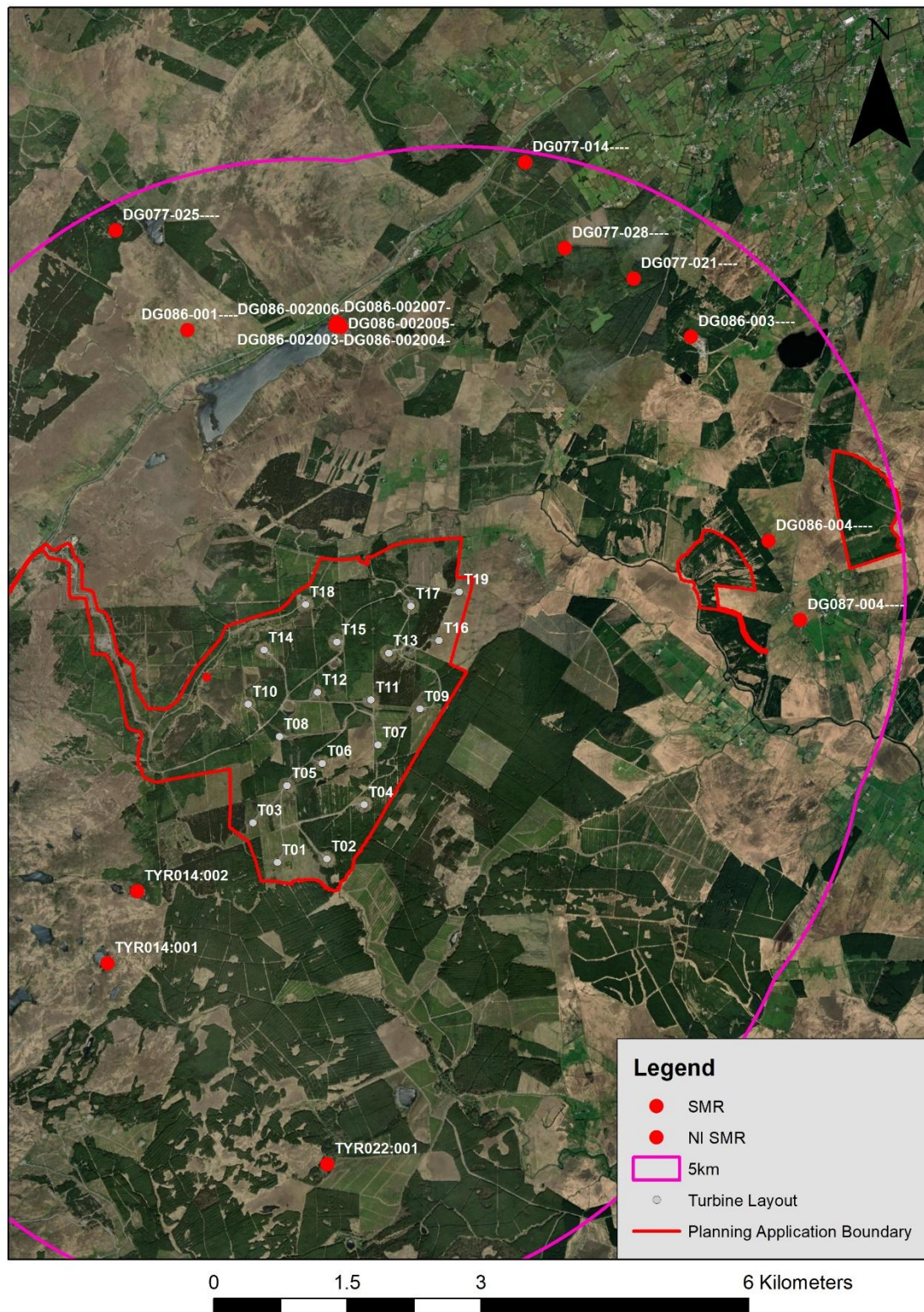


Figure 14-3: Recorded monuments within 5km of the nearest proposed turbine.

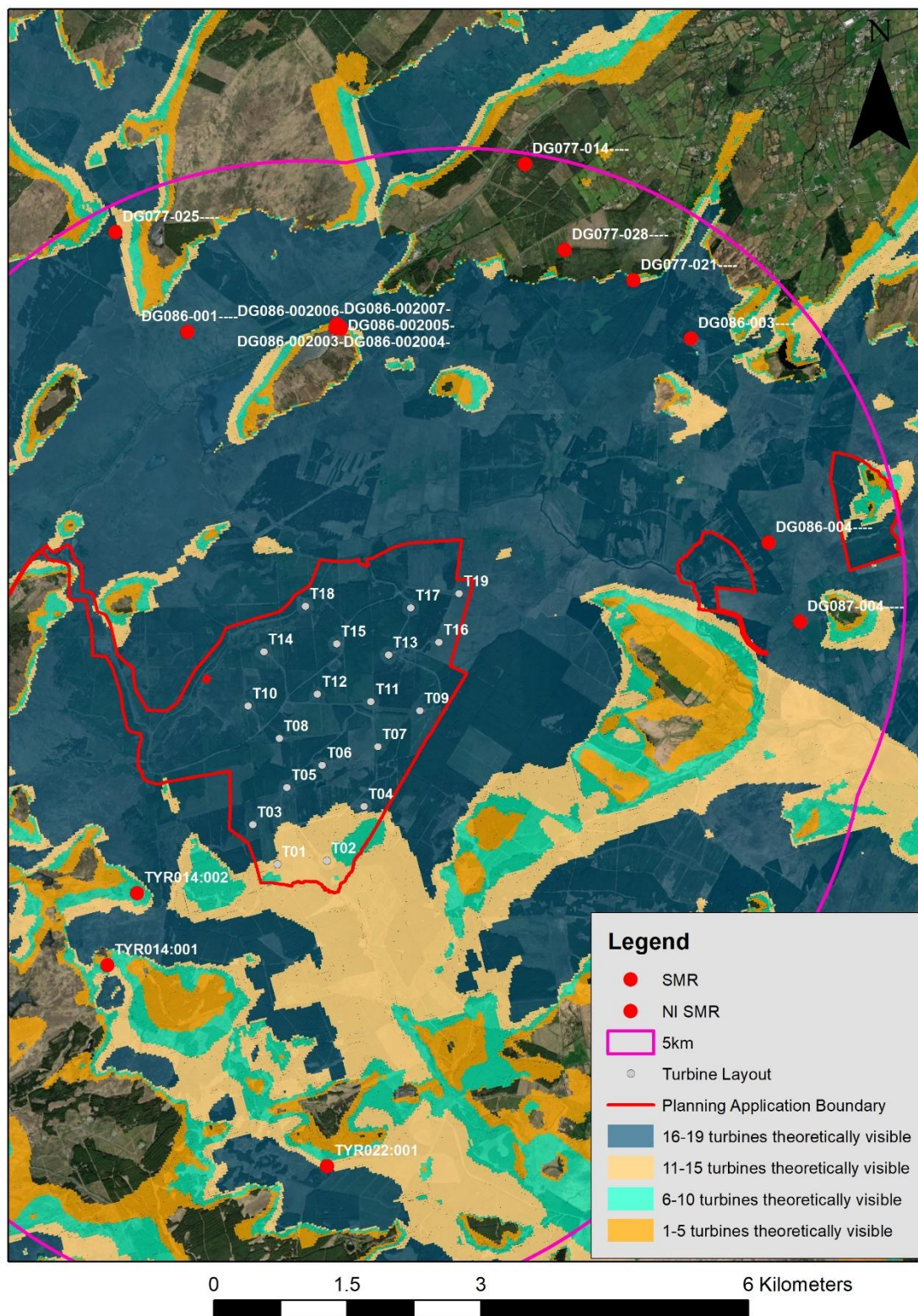


Figure 14-4: Recorded monuments within 5km of the nearest proposed turbine and ZTV.

#### 14.3.1.1.7 Topographical Files of the National Museum of Ireland

The topographical files of the National Museum of Ireland were consulted in 2015 for archaeological finds from the townlands within or adjacent to the Wind Farm Site. The topographical file information as shown on [www.heritagemaps.ie](http://www.heritagemaps.ie) was also consulted (accessed 10<sup>th</sup> March 2026). No find spots are recorded from within the Wind Farm Site. One find is recorded from Croaghonagh townland, c. 1km north-west of T17 (Figure 14-5), as follows:

Reg: 2006:31  
Monument: None  
Finds: Lenght of straw(?) rope  
Townland: Croaghonagh  
Parish: Donaghmore  
Barony: Raphoe  
Vicinity of:  
County: Donegal  
OS 6" sheet: 77 - 47.9 from west, 35.7 from south  
ITM: 608062, 887955

*Found in bog, excavated by NMI  
Found in turf cutting under 50cm of cutaway bog*

A description of the find as made by Andy Haplin to E.P Kelly (dated 06/07/2006) is as follows:

*'Discovery made while cutting turf (by hand) within a broad (c. 4m) fire-break, which had been excavated into bogland at the edge of an area of forestry plantation. The site is an area of blanket bog, situated at an altitude of approximately 180m on the southern slopes of Lough Hill (221m), between Ballybofey and the Barnesmore Gap*

*On inspection, it emerged that the object was a small rope or plaited cord (up to 2cm thick), probably of vegetable fibre. Interestingly it lay upon a layer of gravel which could clearly be seen to be an isolated layer within the peat. the gravel layer was visible in cross section created by the digging of a drainage ditch along the eastern edge of the fire-break, the gravel extended for approximately 2.5m in a N-S direction, with roughly 50cm of peat below it (the base of the peat was not visible but estimated by probing) and approximately 40cm of peat above it. The overlying peat had clearly been cut away on several occasions, however, and there was probably a minimum of 1.0m-1.5m of peat overlying the rope originally. on the east side, the gravel had been cut away by the digging of the drainage ditch, but on the west it appeared to end in a roughly straight edge, forming a linear layer approximately 45cm in width (e-w). Similar gravel horizons were visible in the cross section of the peat, at approximately the same level, further north, but it was impossible to say whether these ever formed a continuous feature. Limited excavation of the gravel revealed no obvious cut marks and it remains uncertain whether the gravel as deposited by natural or human agency.*

*Exploratory excavation around the rope revealed that it was confined to a relatively small area (roughly 30cm square) and was not connected to any other object or feature. Two pieces of wood lay on the gravel, one immediately beside the rope and the other about 40cm to the north. Neither showed evidence of having been worked, however, and they were not attached to the rope in any way. The larger (more distant) piece was retained for possible radiocarbon dating. Because of the extreme fragility of the fibres in the rope, it was decided not to attempt to excavate it on the spot. Instead, an island of gravel and peat around it was isolated and the whole block lifted in one piece. This was brought back to the Conservation Laboratory and I have asked the Head of Conservation to arrange for the rope to be excavated under controlled conditions asap. A small vertical section of peat overlying the rope was also taken and retained for possible examination and/or radiocarbon dating.'*



Figure 14-5: NMI find spot 2006:31 in relation to the Wind Farm Site.

#### 14.3.1.1.8 Sub-Surface Archaeological Potential

All ground works associated with the construction of the Existing Development were subject to archaeological monitoring carried out by Dominic Delaney & Associates under licence from the National Monuments Service (NMS) (see Section 14.3.1.1.4 above). No archaeological finds or features were uncovered during monitoring of the works, which included the Wind Farm Site. As ground works

for the Subject Development are significantly completed and no potential archaeological finds or features were uncovered during those works it is considered that there is a very low potential for the uncovering of sub-surface archaeology in the remaining areas where ground works are required for the Prospective Development.

#### 14.3.1.1.9 Archaeological Landscapes

No archaeological landscapes have been formally identified in the DCDP or in the Derry City & Strabane District Council Local Development Plan (LDP) 2032. In this regard the Prospective Development is not located in or immediately adjacent to areas which have been designated as Archaeological Landscapes.

#### 14.3.1.1.10 Orthophotographic Review

A review of the available aerial imagery of the Wind Farm Site including Google Earth and MapGenie was undertaken. No potential archaeological features were noted within the Wind Farm Site from that review.

#### 14.3.1.1.11 Protected Structures and Listed Buildings (NI) within 5km of the nearest proposed turbine

No Protected Structures or Listed Buildings (NI) are located within the Wind Farm Site. Furthermore, no Protected Structures are located within 5km of the nearest proposed turbine. Only one Listed Building (NI)(HB10/01/014) comprising a thatched cottage is located within 5km of the nearest proposed turbine (Table 14-6) (Figure 14-6). It is situated in County Tyrone in Meenablugh or Fourth Corgary townland c. 4.8km to the east-south-east of T9. It comprises a thatched house dating to 1840 – 1859. The database entry for this structure is accessible on <https://apps.communities-ni.gov.uk/> and was accessed on 11<sup>th</sup> March 2026. The database entry for the house is as follows:

##### *‘Exterior Description And Setting*

*The building faces south-east and is sited a field’s length away from the road at the end of a lane. This road travels south-west from the T junction it forms with the road from Castlederg to Donegal Town. Donegal Town is about nine miles away. The house is seen about 300 yards from the T junction. On the lane approach to the house a new ( NIHE) provided" replacement " dwelling has been built. A two structural bay direct entry thatched house with harled and painted stone walls. The roof is thatched between concrete parapets and each gable rises to a chimneystack with a narrow corbelled capping. The timber sheeted entrance door is protected by a square jambed windbreak porch, with flat concrete roof. The entrance is flanked on either side by a vertically sliding window with sashes divided into two vertically. An outbuilding abutting the left (south-west) gable is roofed with corrugated iron terminated by a concrete parapet. The door is timber sheeted. On the opposite gable there are the remains of another corrugated iron roofed structure this time with a timber plank entrance door. At the rear there are two window openings. That towards the north-east end is vertically sliding with plain sashes and chamfered sash stops. The other window, positioned almost half way along the elevation, is plain.*

##### *Historical Information*

*A building is shown on this site on the OS map of 1833 /34, but it is not noted in the contemporary valuation. The second valuation of 1858 tells us that the house was then occupied by a Neil McFergus, with Sir Robert Ferguson the immediate lessor. The rateable value is recorded as a modest 10/-. A survey of this building carried out in 1992 by Colin Hatrick of EHS reported that the layout and roof structure were original and that the roof was in a fair condition. In 1994 Michele McFaul reported to EHS that re-thatching was required; since then the thatched covering has deteriorated, but a restoration scheme is contemplated.’*

The ZTV demonstrates theoretical visibility of 11-15 turbines from this location (Figure 14-7).

Table 14-6: Listed Building (NI) within 5km of the nearest proposed turbine.

| Listed Building ID | Date              | Type           | Townland                     | ITM E  | ITM N  | TURBINE | DISTANCE TO TURBINE (m) |
|--------------------|-------------------|----------------|------------------------------|--------|--------|---------|-------------------------|
| HB10/01/014        | 1840<br>-<br>1859 | Thatched House | Meenablagh or Fourth Corgary | 613392 | 884840 | T9      | 4826                    |

#### 14.3.1.1.12 NIAH Structures and Historic Gardens within 5km of the nearest proposed turbine

No NIAH structures, historic gardens or historic parks and gardens (NI) are located within the Wind Farm Site. Six (6) NIAH structures are located within 5km of the nearest proposed turbine. The structures are listed in Table 14-7 and shown on Figure 14-8. The nearest of the structures comprises a bridge (Reg. 40908602) at Croaghonagh/Meenbog townland which is located c. 740m from the nearest proposed turbine, T17. The remaining NIAH structures are located in excess of 2.5km to 4.7km from the nearest proposed turbine. The bridge is described on [www.buildingsofireland.ie](http://www.buildingsofireland.ie) as follows:

##### *Description*

*Single-arched bridge carrying road over the Bunadaowen River the north, built c. 1860. Segmental-headed arch with dressed cut stone voussoirs; squared rubble stone construction to arch barrel. Squared rubble stone construction to spandrels and parapets with rubble stone soldier coping over. Modern blockwork repairs to parapets in places, parapets damaged in places. Tarmacadam deck with grass verges. Located in the rural countryside to the south-west of Stranorlar.*

##### *Appraisal*

*This single-arch bridge retains its early form and character, and is a feature of some rustic appeal in the scenic upland rural landscape to the south-west of Ballybofey. It is robustly-constructed in local rubble stone masonry, and its continued survival and use stands as testament to the quality of its original construction, and of the skill of the masons involved. This particular bridge is distinguished by the high quality dressed stone voussoirs to the arch, which helps to elevate this bridge above many of its type in Donegal. It was probably originally constructed during the mid-nineteenth century (not depicted on Ordnance Survey first edition six-inch map sheet of 1837), a period that saw a great deal of road and bridge-building in Ireland, particularly by the Grand Juries (the forerunners of the County Councils), and later by the Board of Works. This bridge is located on a road that leads to the former back entrance to Meenglass Castle (now demolished), a large and complex Tudor Gothic house, built c. 1840, that was sadly demolished c. 1930. This hints that the construction of this bridge, and the road itself, may have been funded by Lord Henry the Fourth of Lifford (later Lord Viscount Lifford) who built and resided at nearby Meenglass Castle a short distance to the north-east. This unassuming rustic bridge is an addition to both the built heritage of the local area and to the extensive transport heritage of County Donegal.*

The ZTV demonstrates theoretical visibility of 16-19 proposed turbines from this location (Figure 14-9).



Plate 14-1: Bridge NIAH Reg. 40908602 at Croaghonagh/Meenbog townlands, looking SW.

Table 14-7: NIAH structures located within 5km of the nearest proposed turbine.

| Reg. No. | Date      | Name                    | Type          | Townland             | ITM E  | ITM N  | TURBINE | DISTANCE TO TURBINE (m) |
|----------|-----------|-------------------------|---------------|----------------------|--------|--------|---------|-------------------------|
| 40908602 | 1840-1860 |                         | bridge        | CROAGHONAGH, MEENBOG | 608094 | 887603 | T17     | 740                     |
| 40908604 | 1860-1900 |                         | bridge        | CROAGHONAGH          | 605123 | 888470 | T14     | 2636                    |
| 40908605 | 1700-1760 | Old Barracks            | barracks      | CASHELNAVEEN         | 604728 | 888483 | T14     | 2930                    |
| 40907714 | 1960-1965 | Church of the Ascension | church/chapel | CARRICKMAGRATH       | 611591 | 891008 | T19     | 4533                    |
| 40907707 | 1850-     | Meencarrigach           | school        | MEENCARGAGH (DOOISH) | 609438 | 891950 | T19     | 4754                    |

| Reg. No. | Date      | Name            | Type                        | Townland     | ITM E  | ITM N  | TURBINE | DISTANCE TO TURBINE (m) |
|----------|-----------|-----------------|-----------------------------|--------------|--------|--------|---------|-------------------------|
|          | 1860      | National School |                             |              |        |        |         |                         |
| 40908501 | 1880-1890 |                 | viaduct, bridge, embankment | KEADEW UPPER | 602023 | 884445 | T3      | 4789                    |

Donegal contains many Historic Gardens and Demesnes, which are characteristic of a particular period of settlement in the county. Many no longer have any visible surface trace with some demesnes now afforested. Only one historic garden, Meenglass, is located within 5km of the nearest proposed turbine and is situated c. 3.9km to the north-east of T19. A description of the site as contained in the Buildings of Ireland Garden Survey noted the following in relation to the site at Meenglass ‘*The garden was once a large heavily wooded demesne with a large house known locally as ‘The Castle’. Not shown on 1st edition OS. There was a gate lodge, outbuildings and walled garden with glasshouse in the south corner. Main road, which went through the demesne was known as Chancellor’s Road and was altered at the south end sometime before 1906. At that time there were five entrances. No buildings, except remnants survive and some mature deciduous trees in the vicinity of the house. Not in use since the 1940s and subsequently afforested. The second crop is now mature. This site no longer constitutes an historic garden, demesne or ornamental designed landscape of interest. The only public access is via Coillte paths.*’ The historic garden is listed in Table 14-8, and shown on Figure 14-8. The ZTV demonstrates theoretical visibility of 16-19 proposed turbines from this location (Figure 14-9).

Table 14-8: Historic Garden within 5km of the nearest proposed turbine.

| Historic Garden Name | ITM E  | ITM N  | TURBINE | DISTANCE TO TURBINE (m) |
|----------------------|--------|--------|---------|-------------------------|
| Meenglass            | 611149 | 890593 | T19     | 3947                    |

#### 14.3.1.1.13 Industrial Heritage (NI) within 5km of the nearest proposed turbine

No Industrial Heritage (NI) sites are located within the Wind Farm Site. Thirteen (13) Industrial Heritage (NI) sites are located within 5km of the nearest proposed turbine in County Tyrone. They are listed in Table 14-9 and shown on Figure 14-10. The sites comprise road bridges, mills (tuck and corn), a lime kiln, still house and a dam. The nearest of these sites comprises a bridge at Sixth Corgary or Second Croagh townland which is located c. 1km from the nearest proposed turbine, T19. The ZTV demonstrates theoretical visibility of 16-19 proposed turbines from this location (Figure 14-11).

Table 14-9: Industrial Heritage sites within 5km of the nearest proposed turbine.

| IH Ref.          | Type   | Townland                       | ITM E  | ITM N  | TURBINE | DISTANCE TO TURBINE (m) |
|------------------|--------|--------------------------------|--------|--------|---------|-------------------------|
| IHR 04282:000:00 | Bridge | Sixth Corgary or Second Croagh | 610170 | 887234 | T19     | 1047                    |

| IHR Ref.         | Type                     | Townland                       | ITM E  | ITM N  | TURBINE | DISTANCE TO TURBINE (m) |
|------------------|--------------------------|--------------------------------|--------|--------|---------|-------------------------|
| IHR 04485:000:00 | Ruins of Old Still House | Slievedoo                      | 606560 | 881985 | T1      | 2246                    |
| IHR 04489:000:00 | Corn Kiln                | Slievedoo                      | 607510 | 881305 | T1      | 2895                    |
| IHR 04490:000:00 | Bridge                   | Meenakeeran / Slievedoo        | 609130 | 881515 | T02     | 3079                    |
| IHR 04283:000:00 | Corn Kiln                | Sixth Corgary or Second Croagh | 611939 | 885864 | T19     | 3120                    |
| IHR 04284:002:00 | Dam                      | SIXTH CORGARY OR SECOND CROAGH | 611956 | 885431 | T16     | 3299                    |
| IHR 04284:003:00 | Millrace                 | SIXTH CORGARY OR SECOND CROAGH | 612035 | 885489 | T16     | 3351                    |
| IHR 04284:000:00 | Tuck Mill site           | Sixth Corgary or Second Croagh | 612049 | 885454 | T16     | 3377                    |
| IHR 04284:001:00 | Mill (Tuck/Fulling)      | SIXTH CORGARY OR SECOND CROAGH | 612075 | 885504 | T16     | 3384                    |
| IHR 04285:000:00 | Bridge                   | Fifth Corgary or First Croagh  | 612479 | 885764 | T19     | 3653                    |
| IHR 04492:000:00 | Lime Quarry & Limekiln   | Slievedoo                      | 608010 | 879905 | T02     | 4319                    |
| IHR 04486:000:00 | Corn Kilns               | Meenakeeran                    | 611659 | 881805 | T02     | 4684                    |
| IHR 04493:000:00 | Bridge                   | Slievedoo                      | 606340 | 879296 | T1      | 4930                    |

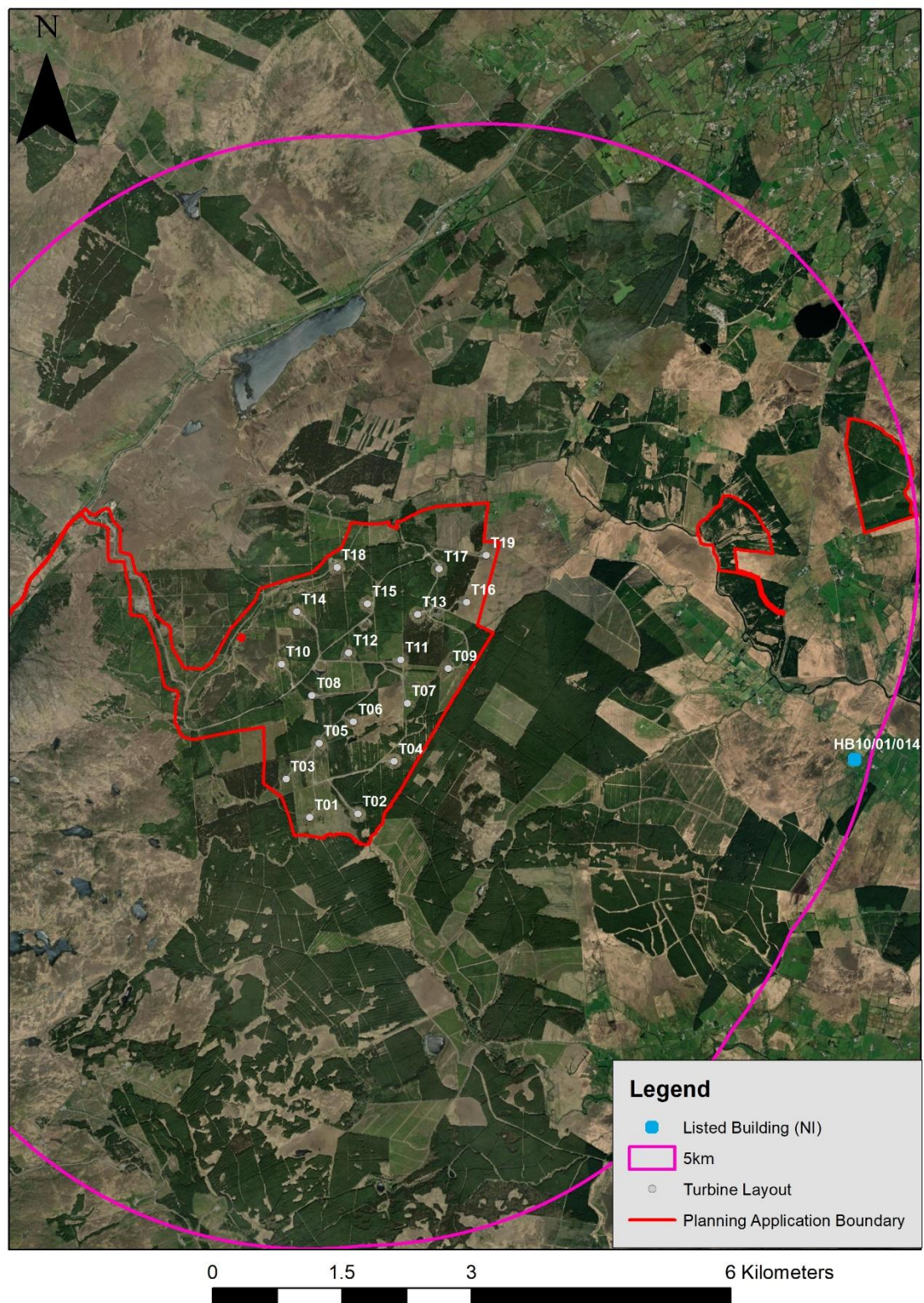


Figure 14-6: Listed Buildings (NI) within 5km of the nearest proposed turbine.

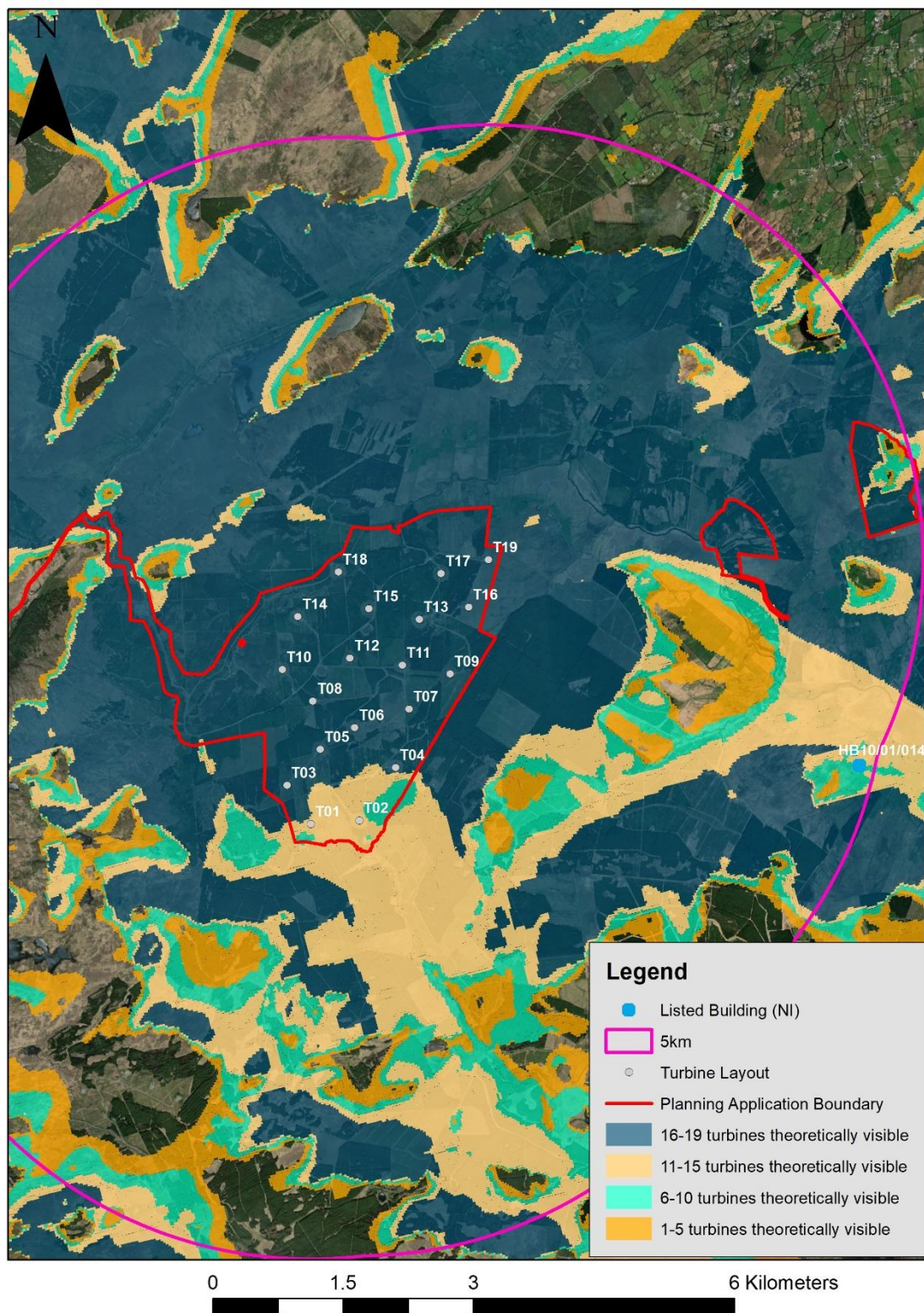


Figure 14-7: Listed Buildings (NI) within 5km of the nearest proposed turbine and ZTV.

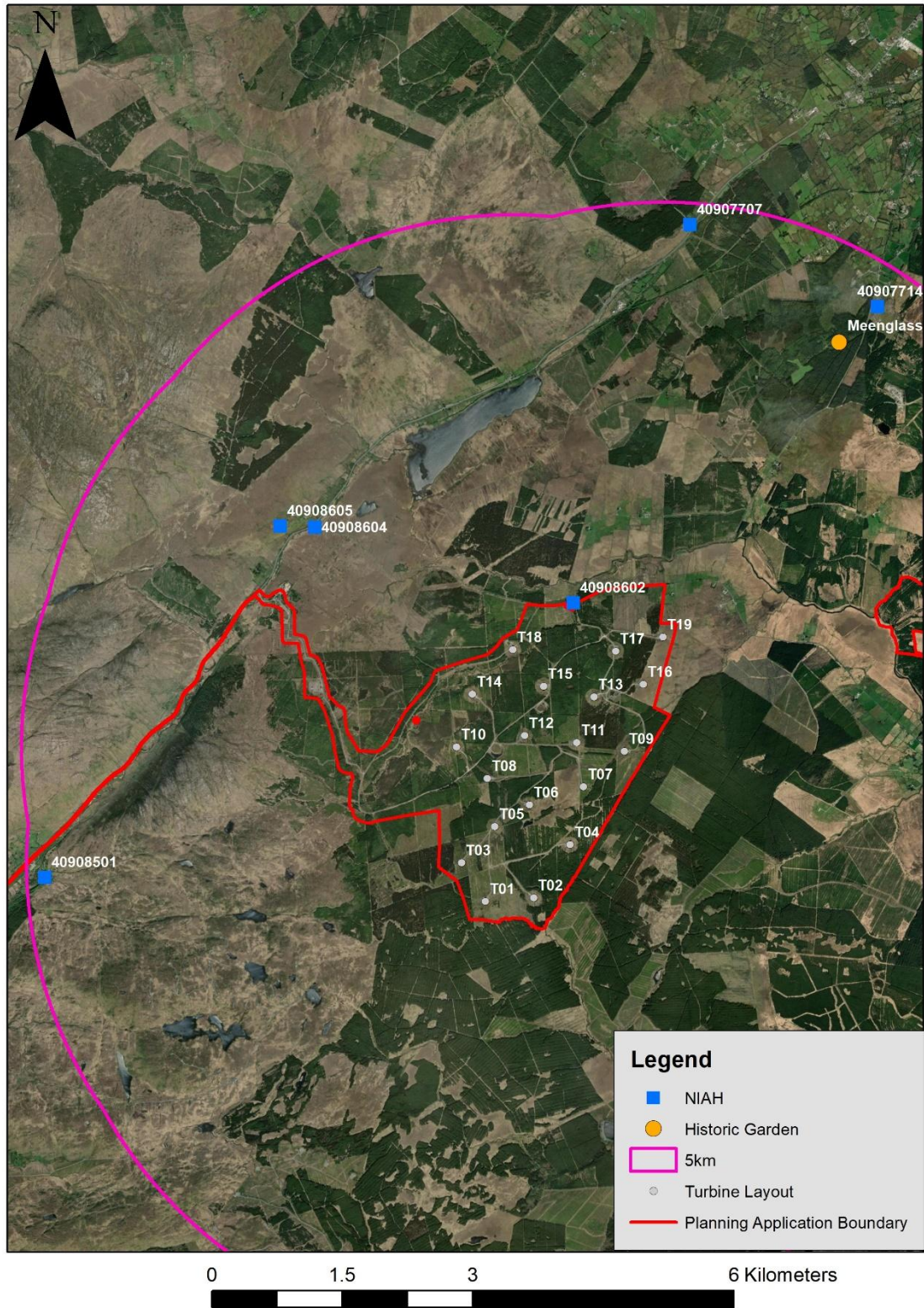


Figure 14-8: NIAH structures and historic gardens within 5km of the nearest proposed turbine.

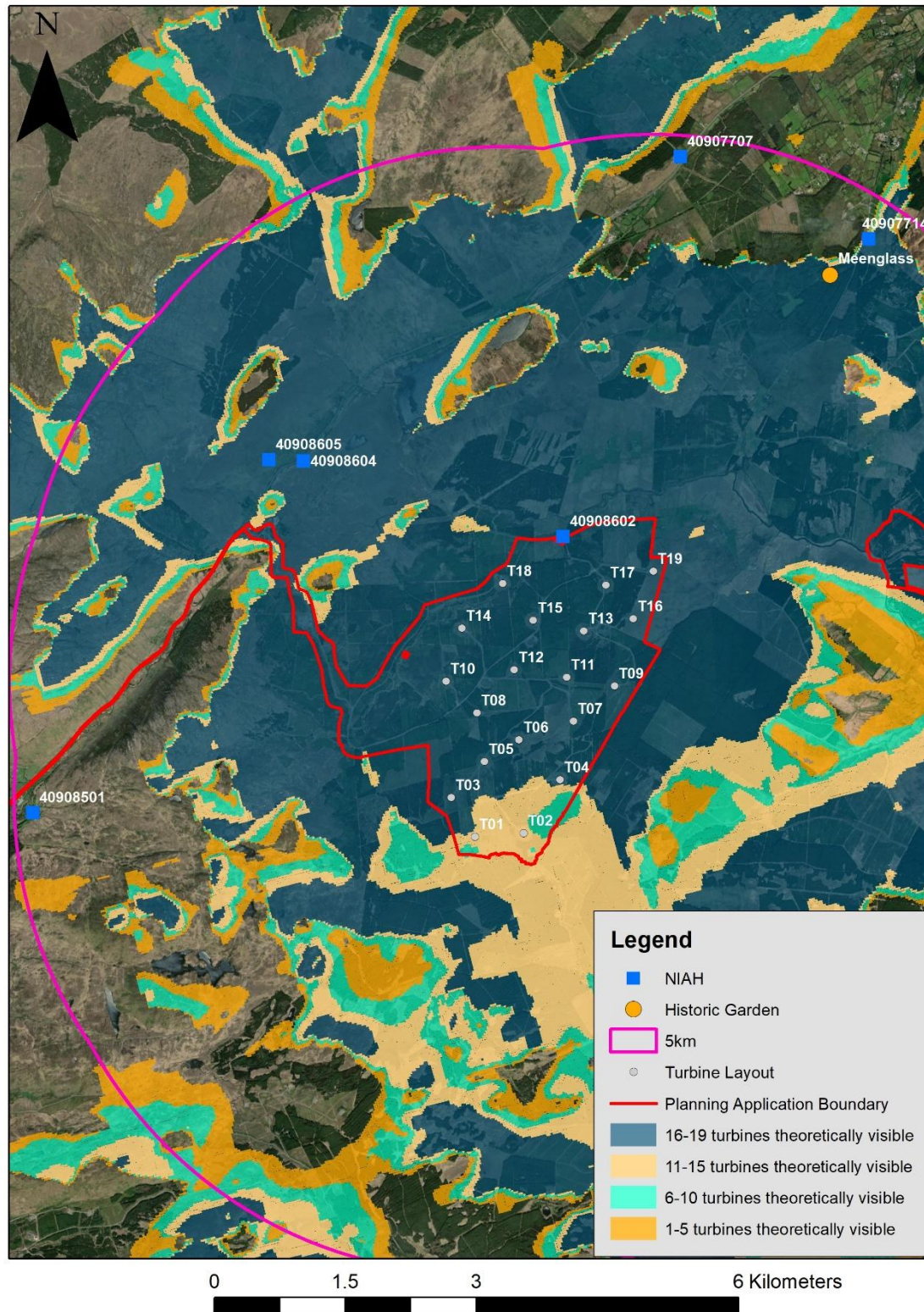


Figure 14-9: NIAH structures and historic gardens within 5km of the nearest proposed turbine and ZTV.

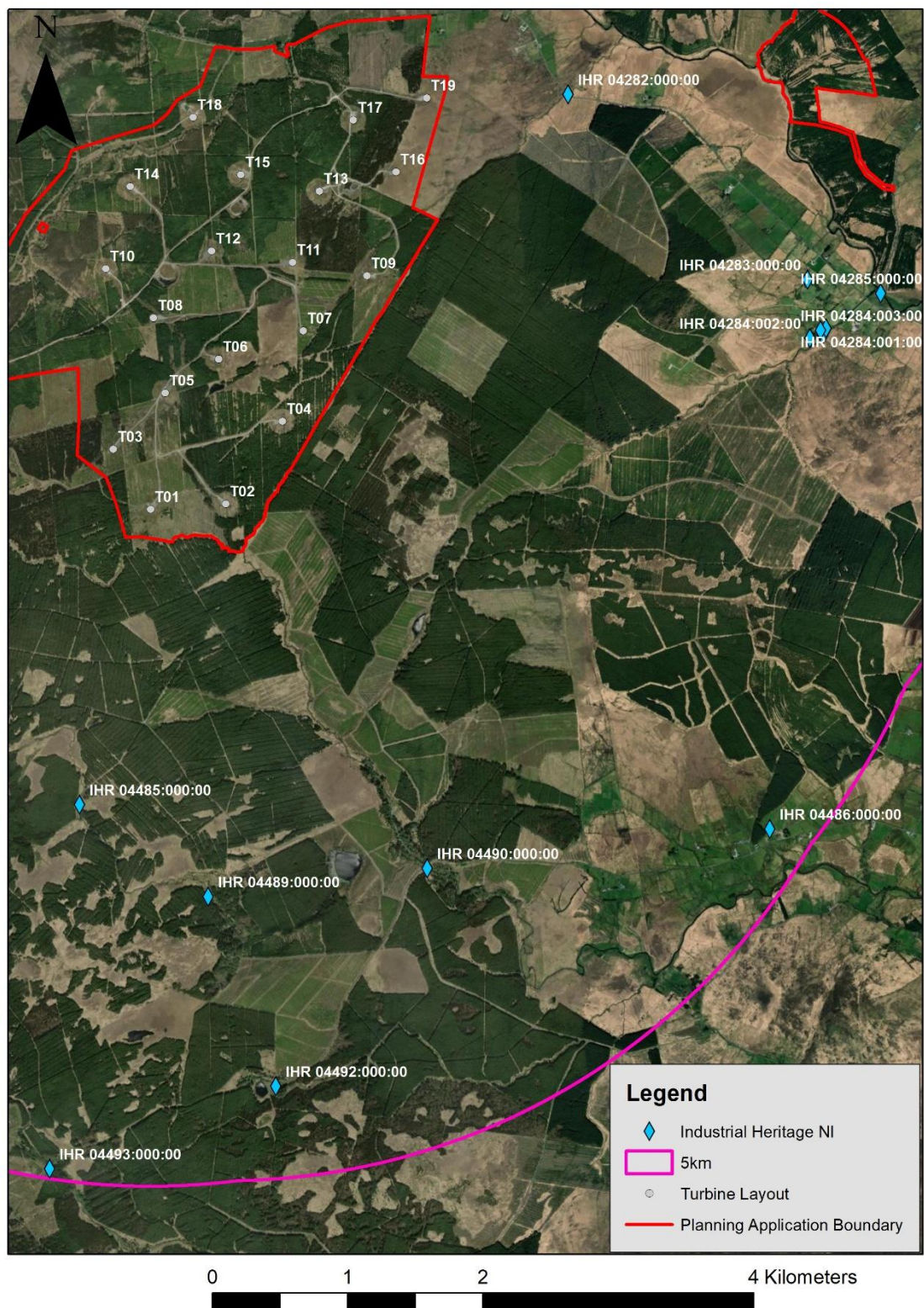


Figure 14-10: Industrial Heritage sites NI within 5km of the nearest proposed turbine.

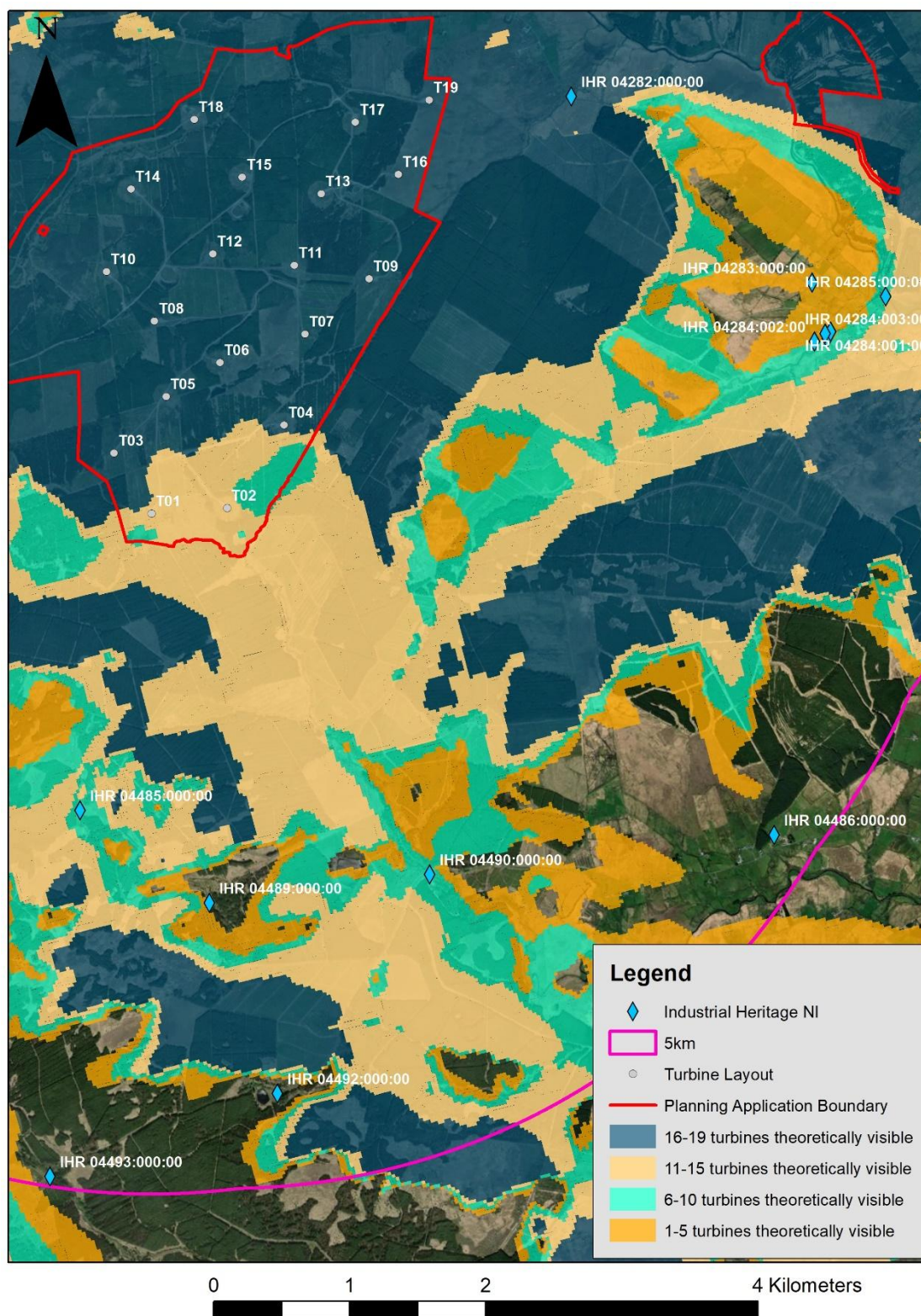


Figure 14-11: Industrial Heritage sites NI within 5km of the nearest proposed turbine and ZTV.

## 14.3.1.1.14

**Cartographic Evidence and Local Cultural Heritage**

The available historic Ordnance Survey maps were consulted for any items of cultural heritage merit that may be located within the Wind Farm Site. Field survey also assisted in determining if any local cultural heritage features were located in the vicinity of any Wind Farm Site infrastructure. The cartographic sources consulted include the Down Survey barony maps (1656-8), and the first (1829-41), second (1897-1913) and third (1830s -1930s) edition Ordnance Survey (OS) maps

**Down Survey Barony Maps**

The Down Survey maps of Ireland are available to view at [www.downsurvey.tcd.ie](http://www.downsurvey.tcd.ie) and were consulted as part of this assessment (<https://downsurvey.tchpc.tcd.ie/>, accessed 9<sup>th</sup> March 2026). Following Cromwell's invasion of Ireland in the mid 17<sup>th</sup> century, the country had been devastated, the population decimated, the economic infrastructure destroyed. The English had effectively created a blank slate in Ireland onto which they now sought to project a new plantation society. Following this a Civil Survey was taken from 1654-6 in order to value the lands in Leinster, Munster, Ulster and Connaught. The Civil Survey is a collation of landowner records, standardized to townland level and was considered by many of the new owners to be inaccurate. The Down Survey, so called because a chain was laid down and a scale made, was therefore taken from 1656-8 under the direction of William Petty. The resulting maps, made at a scale of 40 perches to one inch (the modern equivalent of 1:50,000), were the first systematic mapping of a large area on such a scale attempted anywhere. The primary purpose of these maps was to record the boundaries of each townland and to calculate their areas with great precision. The maps are also rich in other detail showing churches, roads, rivers, castles, houses and fortifications.

The Down Survey barony map in which the Wind Farm Site is located does not show any features of archaeological or cultural heritage interest.

**First, Second and Third Edition OS maps**

The Ordnance Survey came to Ireland in 1824 in order to carry-out a precise admeasurement of the country's 60,000 or so townlands as a preliminary to the larger task of reforming Ireland's local taxation system. The townland boundaries were demarcated by a Boundary Commission, and the Ordnance Survey had the task of measuring them. In addition to boundaries the maps are truly topographical in content. Drawn at the large scale of six inches-to-one-mile (1:10,560) it was important to mark all buildings, roads, streams, placenames, etc, that were required for valuation purposes. Ultimately the maps were used as a basis for the rateable valuation of land and buildings in what became known as Griffith's Valuation. Working from north to south, the survey began in Antrim and Derry in 1829 and was completed in Kerry in 1842. It was published as thirty-two county maps between 1832 and 1846, the number of sheets per county varied from 153 for County Cork to 28 for Dublin, each of the 1,994 sheets in the series depicting an area 21,000 by 32,000 feet on the ground. Each county was projected on a different central meridian and so the maps of adjacent counties do not fit neatly together at the edges. Map content stops at the county lines.

**First Edition**

The early Ordnance Survey maps are an unrivalled source for the period immediately before the Great Irish Famine (1847-50) when the population was at the highest level ever recorded. No items of potential cultural heritage merit are indicated on the first edition OS map within the Wind Farm Site which is depicted as open mountainous land (Figure 14-12). No items of potential cultural heritage merit were noted within the Wind Farm Site during the previous walk-over surveys by Tobar or during archaeological monitoring of ground works for the Existing Development (Delany, 2023).

**Second Edition**

The second edition 25-inch OS map is not available for the area of the Wind Farm Site.

**Third Edition**

No potential archaeological or cultural heritage features are indicated on the third edition OS map in the majority of the Wind Farm Site. A short length (c. 120m) of the line of the disused Donegal Railway extends through the Wind Farm Site close to the existing site entrance (Figure 14-13). The County Donegal Railway was the largest narrow gauge railway system in the British Isles, although it began its existence in the form of the Irish 5'3" broad gauge. The first line to open was the Finn Valley Railway from Strabane to Stranorlar in September 1863. Proposals were then made over the next few years for an extension from Stranorlar to Donegal Town, but this time in 3-foot gauge. Funds were difficult to obtain and the railway was opened initially to Lough Eske Station, in the Townland of Druminnin, in 1882, and extended in to Donegal Town in 1889. The first closure was to passenger services on the Glenties branch in 1947, followed by complete closure in 1952 (<https://donegalrailway.com/railways-of-donegal/> accessed 11<sup>th</sup> March 2026). A stone culvert presumed to be associated with the railway was exposed in section near to the site entrance during monitoring of ground works associated with the Existing Development (Delany, 2023).

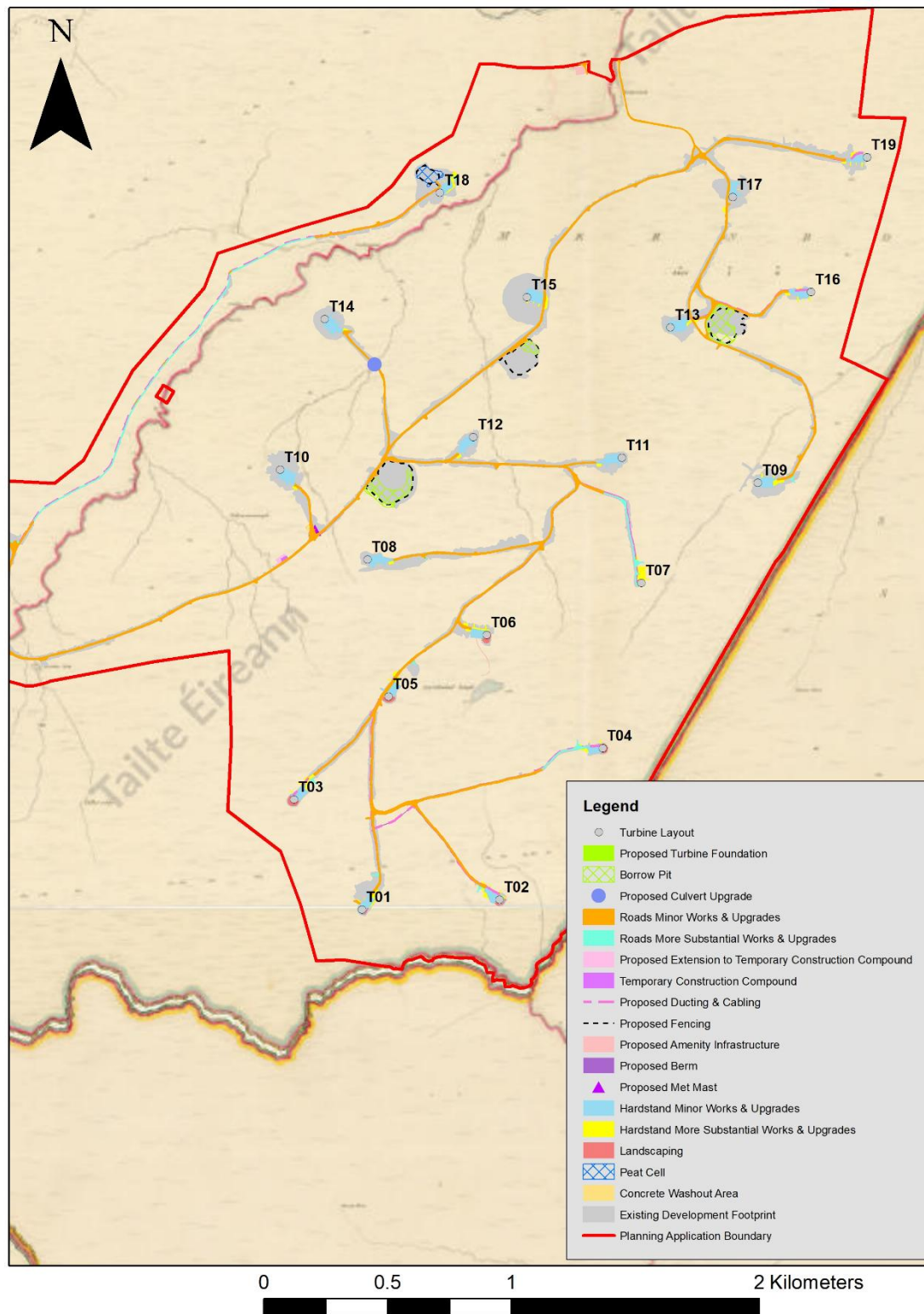


Figure 14-12: Wind Farm site on first edition 6-inch OS background.

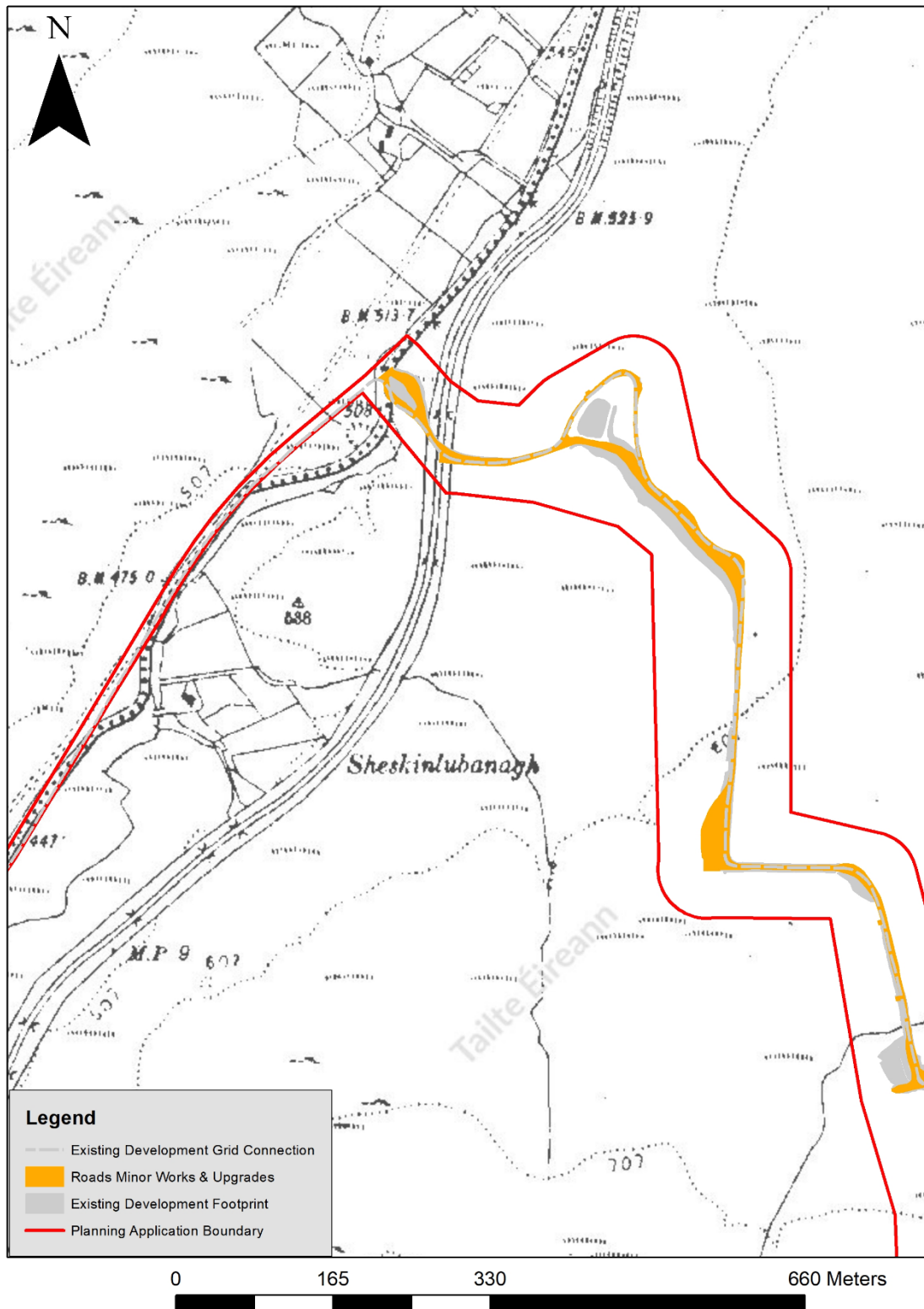


Figure 14-13: Donegal Railway as depicted on third edition OS map.

#### 14.3.1.1.15

### Townlands and administrative boundaries

Townlands and administrative boundaries may indicate the presence of archaeological features within a development site. Administrative counties are subdivisions of pre-established counties which were formed for administrative purposes in the nineteenth and twentieth centuries. Baronies are administrative units larger than civil parishes and originally established as the primary subdivision of counties by the British administration in Ireland. Irish baronies which were formed at the time of the Norman conquest were usually named either after Irish territories, or from places which had been of importance in pre-Norman times. Irish baronies came into existence at different periods. The division of Ireland into counties and baronies was a process which continued down to the reign of James I. The original baronies in Ireland were the domains of the Norman barons; in the final stage of development they were divisions of counties created merely for greater convenience of administration. The word barony is of feudal origin, and was applied to a tenure of a baron, that is, of one who held his land by military service, either directly from the king, or from a superior feudal lord who exercised royal privileges. The origin of the Irish barony (a division of land corresponding to the English hundred) is to be found in the grants of lands which were made to the barons of Leinster and the barons of Meath (Liam Price, 'Ráith Oinn', Éigse VII, lch. 186-7). Civil parishes are administrative units larger than townlands and based on medieval ecclesiastical parishes. Civil parishes, modern Catholic parishes and Church of Ireland parishes may differ in extent and in nomenclature. Counties are administrative units larger than baronies and originally established by the British administration in Ireland between the twelfth and the seventeenth centuries. Some of these were subsequently subdivided into smaller administrative county units.

Townlands are the smallest land units which were determined and established in the Irish administrative system in the first half of the nineteenth century. Many of the townlands were in existence prior to that. Townland names are a valuable source of information, not only on the topography, land ownership and land use within the landscape, but also on its history, archaeological monuments and folklore. Logainm.ie was utilised to ascertain the origin of the townland names within the Wind Farm Site (Table 14-10).

Table 14-10: Townlands within the Wind Farm Site and their meaning.

| Townland Name                  | Meaning                        |
|--------------------------------|--------------------------------|
| MEENBOG (An Mhín Bhog)         | Soft misk or field             |
| CROAGHONAGH (Cruach Eoghanach) | The Tyroman rick or round hill |

#### 14.3.1.1.16

### The Schools' Collection

The National Folklore Collection (NFC) is a UNESCO recognised folklore archive, and one of Europe's largest archives of oral tradition and cultural history, based at University College Dublin. It comprises various documentary formats including manuscript, photographic, audio, library, art and other archival collections. Part of the NFC is the Schools' Collection which comprises approximately 740,000 pages of folklore and local tradition which were collected by pupils from 5,000 primary schools in the Irish Free State between 1937 and 1939 (<https://www.duchas.ie/en/info/cbe-collections>, accessed 11<sup>th</sup> March 2026).

No stories pertaining to the townlands in which the Wind Farm Site is located are recorded.

### 14.3.1.2 The Grid Connection Site

The existing onsite 110kV substation is connected to Clogher 110kV substation via 110kv underground cabling, i.e. the Grid Connection, which extends along existing site tracks as far as the Win Farm Site entrance off the N15 National Road, after which it extends to Clogher 110kV substation in the townland of Cullionboy, primarily along public roads with short a section of the route across private tracks and agricultural land. All groundworks required for the Grid Connection between the onsite 110kV substation have been completed. Archaeological monitoring of those works did not uncover any potential archaeological finds or features. The monitoring report (Delany, 2023) says of these works ‘Works at the cable connection to Clogher substation were inspected on various dates in 2019 and 2020. There are two recorded monuments and two NIAH sites located in the vicinity of the works. None of these sites were impacted by the works and no archaeology was found during monitoring of excavations.’.

As all works associated with the Grid Connection have been completed, no further assessment of same is required herein.

For completeness the townland names and their meanings along the Grid Connection is presented in Table 14-11 below.

Table 14-11: Townlands located along the Grid Connection and their meanings.

| Townland Name                                 | Meaning                                |
|-----------------------------------------------|----------------------------------------|
| CASHELNAVEAN (Caiseal na bhfian)              | Stone fort of the Fians or Fingallians |
| CROAGHONAGH (Cruach Eoghanach)                | The Tyroman rick or round hill         |
| TAWNAWULLY MOUNTAINS (Tamhnaigh an Mhullaigh) | Green spot on a moor of the summit     |
| ARDINAWARK (Ard an Amhairc)                   | Height of the view                     |
| FRIARSBUSH                                    | No meaning provided                    |
| KEADEW LOWER (Céide Íochtarach)               | Hill, mound, open space                |
| KEADEW UPPER (Céide Uachtarach)               | As above                               |
| CULLIONBOY (Cuilleann Buí)                    | Yellow slope or yellow holly           |

### 14.3.1.3 Proposed Biodiversity Management and Enhancement (BMEP) Site

The BMEP Site has also been assessed for potential effects to Cultural Heritage. The BMEP Site comprises two blocks of land, Parcel 1 (eastern block) and Parcel 2 (western block) in which it is proposed to create permanent foraging habitat for hen harrier and the restoration of approximately 6.2 hectares of blanket bog.

No recorded Cultural Heritage assets are located within the proposed BMEP Site. The nearest recorded monument comprises DG086-004— Enclosure which is situated c. 349m north-east of Parcel 2 and c. 820m south-west of Parcel 1. A second recorded monument DG087-004— Ringfort is situated further to the south-east c. 789m south-west of Parcel 1 and c. 512m north-east of the existing forestry road which gives access to Parcel 2. No potential effects to either monument are anticipated (See Section 14.4 below). The monuments are described on the HEV as follows:

**DG086-004— : Enclosure : TIEVECLOGHOGE**

*Description: There is no sign of the 'Fort' marked on the 1st and 2nd editions of the OS 6-inch maps. It was situated in boggy terrain on the SW slope of Tievecloghoge mountain on a rocky grass-covered knoll. The local topography suggests that this was a stone enclosure.*

*The above description was derived from the 'Archaeological Survey of County Donegal. A description of the field antiquities of the County from the Mesolithic Period to the 17th century.' Compiled by: Brian Lacey with Eamon Cody, Claire Cotter, Judy Cuppage, Noel Dunne, Vincent Hurley, Celie O'Rahilly, Paul Walsh and Seán Ó Nualláin (Lifford: Donegal County Council, 1983). In certain instances the entries have been revised and updated. Date of upload: 22 September 2008.*

**DG087-004— : Ringfort - cashel : TIEVECLOGHOGE**

*Description: Overall Diam. 20.7m. This site has been considerably interfered with. It consists of an enclosure formed by collapsed stone. There appears to be the complete outline of an inner structure 6.5m in diameter which is surrounded by a larger circle of collapsed stone except on the N and NW sides. The spill of the outer circle touches the inner enclosure at several points. The inner circle is level but with a lot of loose stones. A depression in the outer wall to the E may have been an entrance. What appears to be the remains of a trigonometrical station, is present at the SW of the outer wall. It is situated on the S slope of an E-W ridge in rough boggy terrain.*

*The above description was derived from the 'Archaeological Survey of County Donegal. A description of the field antiquities of the County from the Mesolithic Period to the 17th century.' Compiled by: Brian Lacey with Eamon Cody, Claire Cotter, Judy Cuppage, Noel Dunne, Vincent Hurley, Celie O'Rahilly, Paul Walsh and Seán Ó Nualláin (Lifford: Donegal County Council, 1983). In certain instances the entries have been revised and updated. Date of upload: 22 September 2008.*

One potential Cultural Heritage feature indicated on the third edition OS map is located within Parcel 2 towards the eastern extent of same. It comprises a rectangular feature indicated on the third edition OS map and named 'Labbincuggy'. It is not visible on the available aerial photography for the area. The proposals for this portion of the BMEP Site involve clear-felling of the coniferous forestry. This will require the construction of approximately 550m of new forest roadway to complete access to Parcel 2. The proposed new access road will be designed as "Build On-Top Embankment Roads" (Floating Roads) in accordance with the COFORD (2004) Forest Road Manual – Guidelines for the Design, Construction and Management of Forest Roads. In this regard no ground works will be required for the new road. While no works are proposed for the area of the potential feature, some mitigation measures are proposed in Section 14.4.3.2 below.

No recorded or previously unrecorded Cultural Heritage assets are located in Parcel 1. Coniferous forestry occupies the majority of both Parcel 1 and Parcel 2. Mitigation measures are proposed for areas currently under forest cover (See Section 14.4.3.2).

The proposed BMEP Site lies entirely within the townland of Tievecloghoge and its meaning is listed in Table 14-12 below.

Table 14-12: Townland within the proposed BMEP Site and its meaning.

| Townland Name                     | Meaning                      |
|-----------------------------------|------------------------------|
| TIEVECLOGHOGHE (Taobh Chlochóige) | Hillside of the round stones |

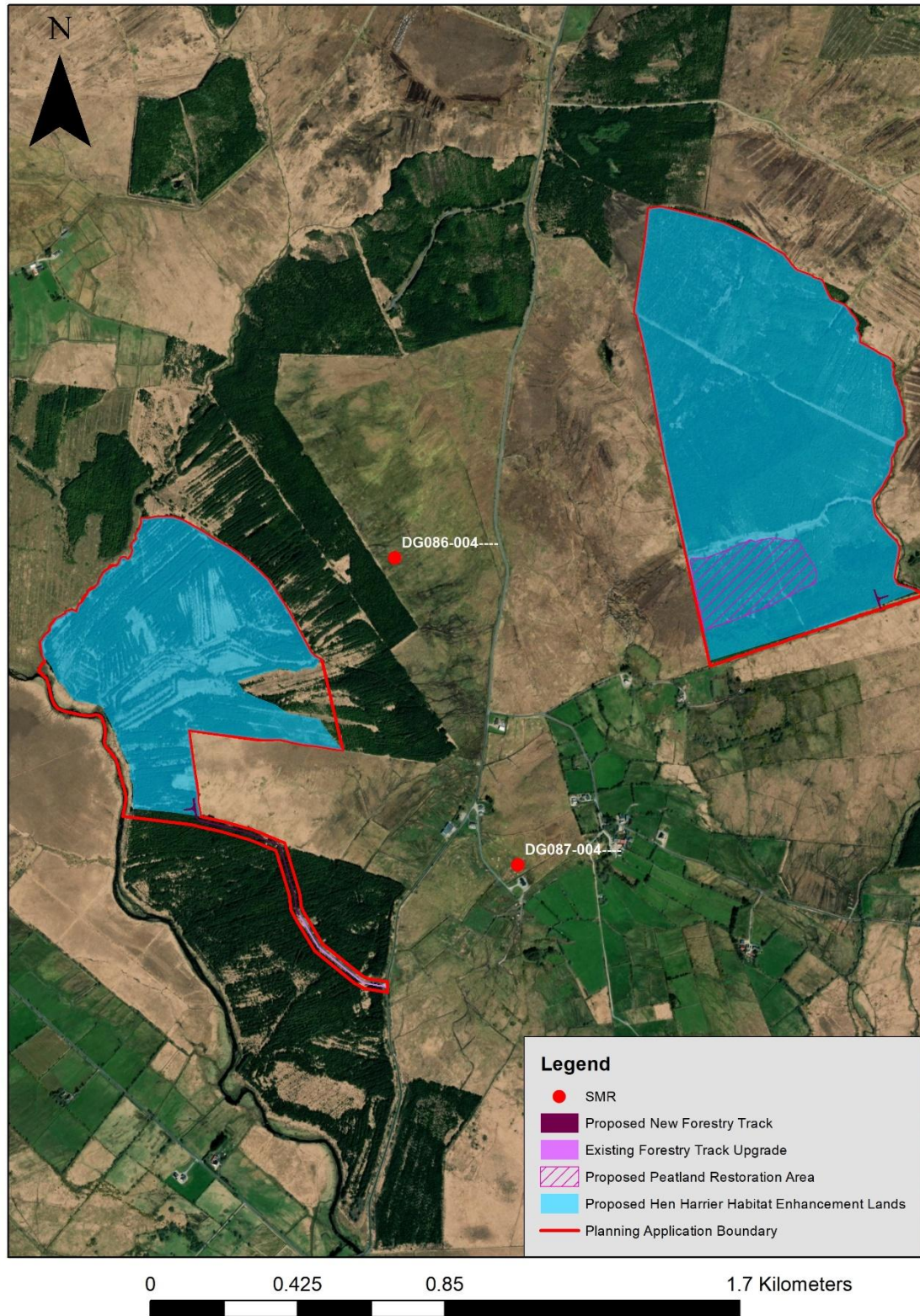


Figure 14-14: Proposed BMEP Site in relation to nearest recorded monuments.

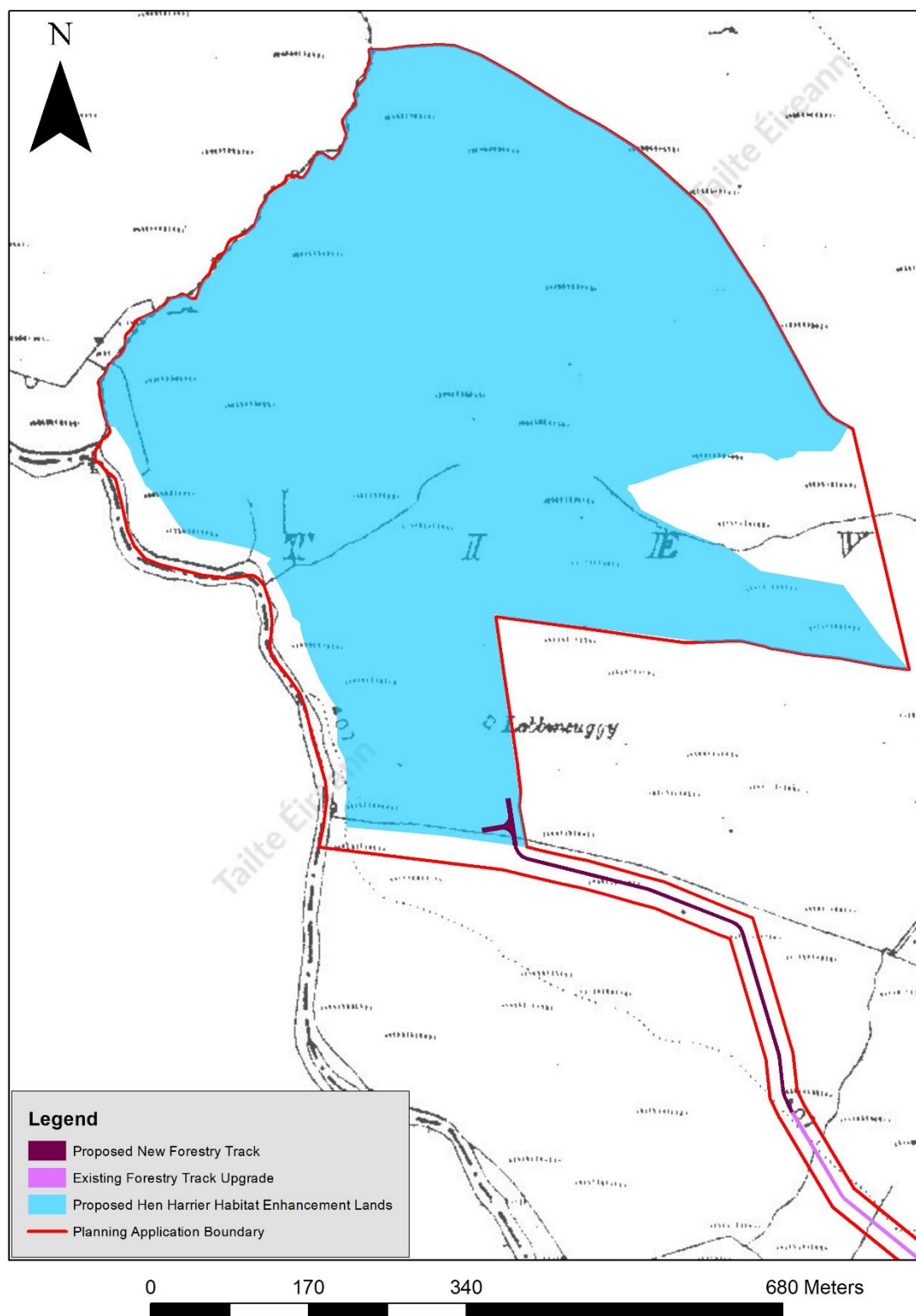


Figure 14-15: Rectangular feature named 'Labbincuggy' as shown on third edition OS map.

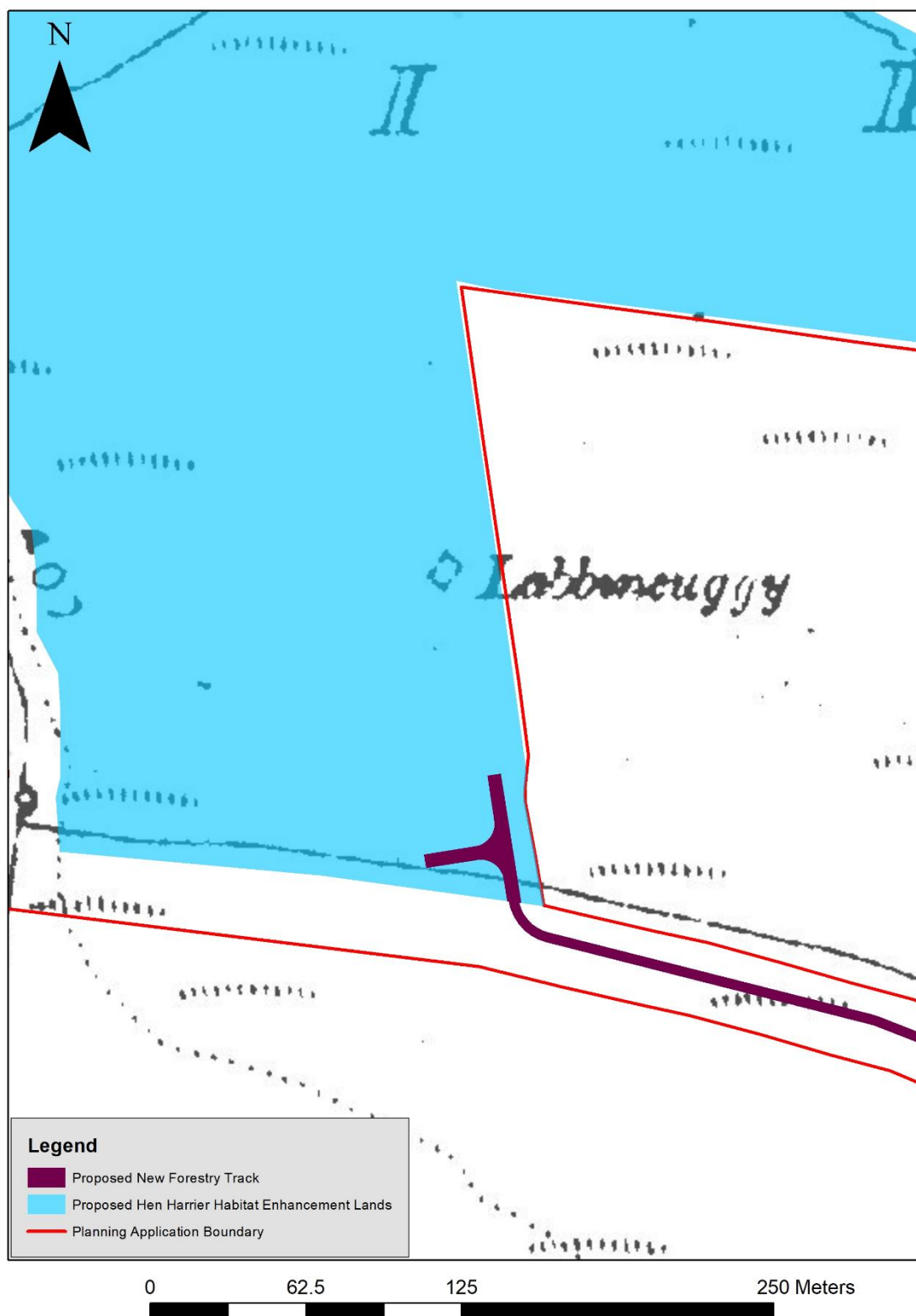


Figure 14-16: Detail of feature named 'Labbincuggy' on third edition OS map.

## 14.4 Likely Effects and Associated Mitigation Measures

### 14.4.1 Do Nothing Scenario

If the Prospective Development were not to proceed, the Site will continue to function as it does at present, with no changes to the current land-use and no potential for effects to Cultural Heritage.

The ‘Do-Nothing’ alternative is an alternative scenario to retaining and regularising the Existing Development. In this scenario, the Existing Development will remain in-situ as an unauthorised and partially completed wind farm, which is, in effect, the “Do-Nothing” alternative insofar as it represents the current situation as at the date of the application for substitute consent.

There would be no direct negative environmental effects as a result of implementing the “Do-Nothing” alternative. However, by implementing this ‘Do-Nothing’ alternative, the opportunity to capture a significant part of the country’s renewable energy resource by completing the Meenbog Wind Farm (subject to appropriate planning consents) would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions. The opportunity to generate local employment, local authority development contributions, rates and investment in the local area would also be lost. Furthermore, the opportunity to implement the proposed biodiversity enhancement measures would be lost. Please see Appendix 6-4 Biodiversity Management and Enhancement Plan of this EIAR for details. Under the “Do-Nothing” alternative the opportunity to put in place the community benefit scheme proposed as part of the Prospective Development would also be lost.

### 14.4.2 Construction Phase Potential Effects (Indirect)

Indirect effects, in terms of archaeology, architectural and cultural heritage are considered to be those effects which happen away from the Site. This includes effects on visual setting of any cultural heritage assets in the wider landscape. Since these effects are largely associated with the proposed turbines, they are only possible once development is operational, they are considered operational effects and are therefore discussed in Section 14.4.4 below. While visual effects are possible during the construction stage of the Prospective Development, an assessment of the fully operational development is considered more robust and all encompassing.

### 14.4.3 Construction Phase Potential Effects (Direct)

Direct effects refers to a ‘physical effect’ on a monument or site. The construction phase of the Prospective Development will involve earthmoving activities such as topsoil/peat removal and excavation works as part of the construction phase. This may have a number of potential negative effects on the known and potential archaeological heritage. These are outlined below with the proposed mitigation measures. The potential effects of the BMEP Site proposals have also been considered.

#### 14.4.3.1 Recorded Archaeological Resource

No recorded archaeological assets are located within the Wind Farm Site or the BMEP Site. As ground works for the construction of Meenbog Wind Farm have been substantially completed and no recorded archaeological features are located therein there is no potential for direct effects to the recorded archaeological resource. Ground works have also been completed for the Grid Connection. Archaeological monitoring of those works did not identify any impacts to the recorded archaeological resource.

#### 14.4.3.2 **Previously Unrecorded Cultural Heritage Assets within the Site**

##### Pre-Mitigation Effect

No previously unrecorded archaeological monuments, stray finds or structures were noted within the Site during the previous walk-over surveys, the Site inspection carried out for this assessment in 2025 or during archaeological monitoring of ground works for the Existing Development. In this regard no potential direct effects to such finds or sites are identified. This is considered a Neutral effect.

One potential Cultural Heritage feature was noted within Parcel 2 of the BMEP Site during the cartographic review carried out as part of this assessment. The potential feature is indicated on the third edition OS map and named 'Labbincuggy'. No evidence for a feature at this location was apparent on the available aerial photography and dense coniferous forestry is located in its immediate vicinity. Clear-felling of that forestry is proposed as part of the BMEP in addition to the construction of an access road to facilitate provision of harvesting machinery. The proposed access road which is located c. 75m to the south of the potential feature will not involve ground disturbance as a 'Build on Top' methodology will be utilised. In this regard no potential direct effects to the feature as a result of same is identified, however, some mitigation is proposed as a precautionary measure.

Both Parcel's 1 and 2 are currently covered in dense coniferous forestry. the presence of such forestry cover may obscure the presence of previously unknown Cultural Heritage assets. In this regard and in the interest of ensuring the continued preservation of any items of Cultural Heritage merit which may be located within the proposed BMEP Site some mitigation is proposed as a precautionary measure.

##### Proposed Mitigation Measures

- A buffer zone of 10m will be established around the potential Cultural Heritage feature within Parcel 2 prior to the commencement of clear-felling in this area. The buffer will comprise durable post-and-wire fencing with 'Keep Out' signage.
- A walk-over survey of the BMEP Site (both Parcels) will be carried out post-clear-felling but prior to any other works such as stump flipping or drain blocking.
- The location of any potential Cultural Heritage features therein will be recorded and a photographic record made of same. A report on the results of the walk-over survey will be compiled on completion of same and will include any further required mitigation measures such as additional buffer zones, etc, deemed necessary.

#### 14.4.3.3 **Sub-surface Archaeological Potential**

##### Pre-Mitigation Effect

Ground works for the Subject Development have been substantially completed and were subject to archaeological monitoring, during which time no sub-surface archaeological finds or features were uncovered. The ground works which will be required as part of the Prospective Development will involve peat removal. The potential exists for the presence of sub-surface archaeological finds, structures and deposits within the peat, particularly where deeper peat remains in situ. The excavation of peat for the Prospective Development has the potential to directly affect such sub-surface finds, structures and deposits should they exist within the Wind Farm Site. In the absence of appropriate mitigation measures the potential effect is considered to be direct, negative and permanent and would result in a Significant effect to such features if present.

Ground works for the proposed BMEP Site are considered to be minimal in terms of depth as they will largely comprise the flipping of tree stumps and surface smoothing. The former comprises the flipping

of the tree stumps into the adjacent furrow using a mechanical excavator equipped with a toothed bucket. Ground disturbance associated with this work is localised to the generally shallow root system of the tree and will not require deep excavation. Surface smoothing is the process where the ridge and furrows of the forestry drains are levelled or smoothed out using a combination of damping down with the excavator bucket, flipping or mulching stumps, and cross tracking. Surface smoothing also does not involve any deep excavation and may be regarded as minimally invasive given that the key principles of such work are 'enough and no more' and aim to minimise compaction and disturbance. In this regard, no potential direct impacts to sub-surface archaeology are identified, however, mitigation measures are proposed on a precautionary basis.

### Proposed Mitigation Measures

- Archaeological monitoring under licence from the NMS of any further peat removal required as part of the construction stage of the Prospective Development will be carried out by a suitably qualified archaeologist. A report detailing the results of the monitoring will be compiled on completion of the work and submitted to the NMS and Planning Authority/Body.
- Should archaeological finds, structures or deposits be uncovered as a result of the monitoring further mitigation measures such as preservation in situ or preservation by record (excavation) may be required and will be decided in consultation with the NMS. Such mitigation measures will be implemented where relevant following consultation with the NMS. A report detailing the results of the monitoring and/or any further necessary mitigation as referred to above will be compiled on completion of the work and submitted to the NMS and Planning Authority/Body.
- A walk-over survey of the BMEP Site (both Parcel 1 and Parcel 2) will be carried out post-clear-felling but prior to any other works such as stump flipping or drain blocking.
- The location of any potential Cultural Heritage features therein will be recorded and a photographic record made of same. A report on the results of the walk-over survey will be compiled on completion of same and will include any further required mitigation measures such as additional buffer zones, etc, deemed necessary.
- A second phase of walk-over survey will be carried out after stump flipping to ensure that any potential finds, features or deposits, if present, can be recorded and any other mitigation required can be implemented.

### Residual Effect

The potential effect after the implementation mitigation measures is likely to be Long-term, Negative and Slight which is Not Significant.

### Significance of Effects

The construction phase will not have any significant effects on unrecorded potential sub-surface sites since they will be dealt with by way of mitigation measures. The overall significance of effects is likely to be Slight which is Not Significant.

#### 14.4.3.4 Recorded Architectural and Built Heritage Resource

No recorded architectural or built heritage assets are located within the Wind Farm Site or the BMEP Site. As no recorded architectural or built heritage features are located therein there is no potential for direct effects to the recorded architectural or built heritage resource. This is considered a Neutral Effect. Ground works have also been completed for the Grid Connection. Archaeological monitoring of those works did not identify any impacts to the recorded built heritage resource. As the ground works for the

Grid Connection are complete there is no potential for direct effects to the recorded architectural and built heritage resource.

#### 14.4.4 Operational Phase Potential Effects (Indirect)

Indirect effects are where a feature or site of archaeological, architectural heritage merit or their setting is located in close proximity to a proposed development. Indirect effects here are mainly concerned with effects on setting of cultural heritage sites.

Effects on settings of sites may arise when a development is proposed immediately adjacent to a recorded monument or cluster of monuments. While the Prospective Development may not affect a site, it may alter the setting of a monument or group of monuments. There is no standardised industry-wide approach for assessing the degree of effect to the setting of a monument. For purposes of assessing visual effects on setting, the uniqueness of the monuments, the potential interrelationships of monuments, the inter-visibility of monuments, visual dominance and whether a setting is altered or unaltered can be used to assess effect. The nature and dominance of the Subject Development is also taken into consideration and the topography within which the Subject Development is located. Operational effects are considered largely as a result of the proposed turbines rather than other elements of the Subject Development which would not be dominant in the wider landscape setting in general, however the proposed met mast is also considered. The assessment of effects on visual setting was undertaken using both the Zone of Theoretical Visibility (ZTV) map in the Landscape and Visual Impact Assessment (LVIA), as presented in Chapter 13 of this EIAR, and also with reference to photomontages. The ZTV is a bare-ground model which does not take screening vegetation into account.

No potential visual effects as a result of the Grid Connection or the proposed BMEP Site to the Cultural Heritage resource are considered possible and therefore are screened out of this Section of the assessment.

##### 14.4.4.1 UNESCO World Heritage Sites and those on Tentative List

###### Identification of Effect

No UNESCO World Heritage Sites (WHS) or those on the Tentative list are located within the Wind Farm Site or within 20km of same. The nearest WHS (Tentative list) comprises the Passage Tomb Landscape of County Sligo which is situated c.61km to the south-west. Given the considerable distance between the Wind Farm Site and the Passage Tomb Landscape of County Sligo it is not considered that potential visual effects to that landscape will occur as a result of the proposed turbines. No potential visual effects are therefore identified. This is considered to be a Neutral effect.

##### 14.4.4.2 National Monuments

###### Identification of Effect

No National Monuments, those subject to a Preservation Order or NI State Care sites are located within the Wind Farm Site or within 10km of the nearest proposed turbine. The nearest monument in State Care (NM No. 174) comprises Donegal Castle which is located over 15km to the south-west of T3. The ZTV demonstrates no theoretical visibility of the proposed turbines from the monument therefore potential visual effects to its setting are not identified. This is considered to be a Neutral effect.

The ZTV demonstrates theoretical visibility of 16-19 proposed turbines from the nearest monument subject to a Preservation Order (PO No. 5/1973). Given the distance of the monument from the nearest proposed turbine (c. 11km) no potential visual effects to its immediate setting will occur. Furthermore,

the relatively low-visibility nature of the monument and the intervening distance is such that potential visual effects to its wider setting are considered to be Imperceptible which is Not Significant.

### Mitigation Measures

No mitigation measures proposed.

### Residual Effect

The residual effects range from Imperceptible to Neutral.

### Significance of Effects

The operational phase will not have any significant effects on National Monuments or those subject to a Preservation Order. The overall significance of effects ranges from Imperceptible to Neutral, which is Not Significant.

#### 14.4.4.3 Recorded Monuments

##### Identification of Effect

A total of eighteen (18) recorded monuments are located within 5km of the nearest proposed turbine. This number comprises 15 recorded monuments in County Donegal and three monuments (NI SMR) in County Tyrone. Six of the 18 monuments are located in areas where 16-19 turbines will theoretically be visible. One monument is located in an area where 11-15 turbines will theoretically be visible. Four monuments are located in areas where 6-10 turbines will theoretically be visible, with five additional monuments located in areas where 1-5 turbines will theoretically be visible. Two recorded monuments are located in areas where none of the proposed turbines will theoretically be visible.

Both the distance to the nearest turbine and the number of turbines visible from cultural heritage assets are used to arrive at a level of potential effect on setting (see Table 14-4). This is not utilised, however, for those monuments that are considered to have no or very low visibility in the landscape such as those which have no surface expression or which have been removed through archaeological excavation. No potential visual effects are concluded for those monuments located in areas where there is no theoretical visibility of proposed turbines.

Potential effects on setting as detailed in Table 14-13 below are based on a theoretical precautionary scenario in that natural screening, boundaries, buildings and vegetation are not taken into account in the ZTV model. In reality the effect will be reduced since the ZTV model does not take natural screening and buildings into consideration which will alleviate if not remove the effect on setting altogether. Furthermore, many of these monuments are not readily discernible in the landscape which further ameliorates effects on setting.

No recorded monuments (SMR or NI SMR) are located within the Wind Farm Site therefore effects to the immediate setting of any monuments will not occur. Potential effects to the wider setting in which those monuments are located are discussed below and set out in the following table. The potential effects to the wider setting of recorded monuments within 5km ranges from Slight-Not Significant, Negative, Long Term, with no potential effects determined for monuments located where no turbines will theoretically be visible. In the case of monuments DG086-002001-, DG086-002003-, DG086-002004-, DG086-002005-, DG086-002006-, and DG086-002007- which were all subject to archaeological excavation in advance of development and therefore are no longer extant, no potential visual effect to same is identified.

Table 14-13: Table of potential effects on setting of recorded monuments within 5km of the nearest proposed turbine.

| SMR           | Monument Type                | ITM E  | ITM N  | Townland     | Number of turbines theoretically visible | Distance to nearest turbine (m) | Theoretical Significance of Effect |
|---------------|------------------------------|--------|--------|--------------|------------------------------------------|---------------------------------|------------------------------------|
| TYR014:002    | A.P. SITE - CRANNOG?         | 605464 | 883855 | SLIEVEDOO    | 6-10                                     | 1506                            | Slight                             |
| TYR014:001    | ISLAND, possibly CRANNOG     | 605131 | 883045 | SLIEVEDOO    | 6-10                                     | 2214                            | Slight                             |
| DG086-002005- | Burnt spread                 | 607798 | 890178 | CROAGHONAGH  | 6-10                                     | 3139                            | N/A                                |
| DG086-002002- | Standing stone               | 607737 | 890188 | CROAGHONAGH  | 1-5                                      | 3142                            | Not Significant                    |
| DG086-002004- | Megalithic tomb - wedge tomb | 607747 | 890194 | CROAGHONAGH  | 1-5                                      | 3149                            | N/A                                |
| DG086-002001- | Cairn - burial cairn         | 607754 | 890203 | CROAGHONAGH  | 1-5                                      | 3159                            | N/A                                |
| DG086-002003- | Hearth                       | 607754 | 890206 | CROAGHONAGH  | 1-5                                      | 3162                            | N/A                                |
| DG086-002006- | Pit                          | 607785 | 890203 | CROAGHONAGH  | 1-5                                      | 3163                            | N/A                                |
| DG086-002007- | Fulacht fia                  | 607751 | 890229 | CROAGHONAGH  | 6-10                                     | 3185                            | N/A                                |
| DG086-001—    | Hilltop enclosure            | 606074 | 890146 | CASHELNAVEAN | 16-19                                    | 3354                            | Slight                             |

| SMR        | Monument Type                 | ITM E  | ITM N  | Townland       | Number of turbines theoretically visible | Distance to nearest turbine (m) | Theoretical Significance of Effect |
|------------|-------------------------------|--------|--------|----------------|------------------------------------------|---------------------------------|------------------------------------|
| TYR022:001 | HOLY WELL                     | 607595 | 880790 | SLIEVEDOO      | 11-15                                    | 3426                            | Slight                             |
| DG086-004— | Enclosure                     | 612592 | 887779 | TIEVECLOGHOGE  | 16-19                                    | 3516                            | Slight                             |
| DG087-004— | Ringfort - cashel             | 612947 | 886892 | TIEVECLOGHOGE  | 16-19                                    | 3837                            | Slight                             |
| DG086-003— | Enclosure                     | 611721 | 890068 | TRUSK          | 16-19                                    | 3865                            | Slight                             |
| DG077-021— | Megalithic tomb - portal tomb | 611077 | 890720 | CARRICKMAGRATH | 16-19                                    | 4021                            | Not Significant                    |
| DG077-028— | Standing stone                | 610306 | 891063 | MEENBOG        | 0                                        | 4034                            | N/A                                |
| DG077-025— | Megalithic structure          | 605269 | 891263 | LOUGHSALLAGH   | 16-19                                    | 4708                            | Not Significant                    |
| DG077-014— | Ringfort - cashel             | 609863 | 892026 | GOLAND         | 0                                        | 4876                            | N/A                                |

## Mitigation Measures

No mitigation measures proposed.

## Residual Effect

The residual effects range from Slight-Not Significant Negative, Long Term as outlined in Table 14-13 of Potential Effects.

## Significance of Effects

The operational phase will not have any significant effects on recorded monuments. The overall significance of effects ranges from Slight-Not Significant.

### 14.4.4.4 Previously Unrecorded Monuments

#### Identification of Effect

No previously unrecorded archaeological monuments, stray finds or potential structures were noted within the Wind Farm Site during the walk-over surveys or during previous archaeological monitoring of ground works for the Existing Development. In this regard no potential visual effects to the setting of such finds or sites are identified. This is considered to be a Neutral effect.

### 14.4.4.5 Sub-surface Archaeology

Potential visual effects to sub-surface archaeology which may exist within the Wind Farm Site are negated by the sub-surface nature of such features that do not have any above-ground elements on which the Prospective Development will have a visual effect. This is considered to be a Neutral effect.

### 14.4.4.6 Archaeological Landscapes

The Prospective Development is not located in or immediately adjacent to areas which have been designated as Archaeological Landscapes. Potential visual effects to any such landscapes will therefore not occur. This is considered to be a Neutral effect.

### 14.4.4.7 Protected Structures and Listed Buildings (NI)

#### Identification of Effect

No Protected Structures or Listed Buildings (NI) are located within the Wind Farm Site. Furthermore, no Protected Structures are located within 5km of the nearest proposed turbine. Only one Listed Building (NI)(HB10/01/014) comprising a thatched cottage is located within 5km of the nearest proposed turbine. It is situated in County Tyrone in Meenablugh or Fourth Corgary townland c. 4.8km to the east-south-east of T9. The ZTV demonstrates theoretical visibility of 11-15 turbines from this location. Both the distance to the nearest proposed turbine and the number of turbines theoretically visible from cultural heritage assets are used to arrive at a level of potential effect on setting (see Table 14-4). The immediate setting of the Listed Building will not be affected, however, a change to the wider setting within which it is located is acknowledged and is considered to be Not Significant, Negative, Long Term (See Table 14-14 below). The distance of the building from the proposed turbines will mitigate some potential visual effects. Additionally it is located on private lands which are not formally

accessible to the public. It is also noted that natural screening, boundaries, buildings and vegetation were not taken into consideration in the ZTV and will also potentially screen some visual effects.

Table 14-14: Table of potential effects on setting of Listed Buildings (NI) within 5km of the nearest proposed turbine.

| Listed Building ID | Date        | Type           | Townland                     | Number of turbines theoretically visible | Distance to Turbine (m) | Theoretical Significance of Effect |
|--------------------|-------------|----------------|------------------------------|------------------------------------------|-------------------------|------------------------------------|
| HB10/01/014        | 1840 - 1859 | Thatched House | Meenablagh or Fourth Corgary | 11-15                                    | 4826                    | Not Significant                    |

### Mitigation Measures

No mitigation measures proposed.

### Residual Effect

The residual effects will be Not Significant, Negative, Long Term as identified in Table 14-14 of Potential Effects and as discussed above.

### Significance of Effects

The overall significance of effects is Not Significant.

## 14.4.4.8 NIAH Structures and Historic Gardens

### Identification of Effect

No NIAH structures, historic gardens or historic parks and gardens (NI) are located within the Site. Six (6) NIAH structures are located within 5km of the nearest proposed turbine. The nearest of the structures comprises a bridge (Reg. 40908602) at Croaghonagh/Meenbog townland which is located c. 740m from the nearest proposed turbine, T17. The remaining NIAH structures are located in excess of 2.5km to 4.7km from the nearest proposed turbine. The ZTV demonstrates theoretical visibility of 16-19 proposed turbines from four of the NIAH structures, with no theoretical visibility from the remaining two structures.

Only one historic garden, Meenglass, is located within 5km of the nearest proposed turbine and is situated c. 3.9km to the north-east of T19. The ZTV demonstrates theoretical visibility of 16-19 proposed turbines from this location.

Both the distance to the nearest proposed turbine and the number of turbines theoretically visible from cultural heritage assets are used to arrive at a level of potential effect on setting (see Table 14-4). The theoretical significance of effects to NIAH structures located within 5km of the nearest proposed turbine is listed in Table 14-15 while the theoretical significance of effects on the setting of historic gardens is listed in Table 14-16 and ranges from Moderate to Not Significant, Negative, Long Term. In regard to the historic garden it should be noted that this site does not retain many of its original features and by its very nature is not readily visible in the wider landscape. Potential visual effects as identified in the table below will therefore be mitigated by distance to the proposed turbines, intervening natural screening and the low visibility nature of the garden. By virtue of its distance (740m) to the nearest proposed turbine the potential effect identified for the bridge at Croaghonagh/Meenbog townland when using Table 14-4 would be Significant. The nature of the structure (road bridge) is such that it is not

visually dominant in the landscape and its sensitivity is considered Medium-Low (see Table 14-2). In this regard the potential visual effect to the setting of this structure is regarded as Moderate. It should also be noted that existing natural screening and vegetation will mitigate the potential visual effect to the wider setting of the bridge and in reality, the significance of effect will be less.

Table 14-15: Table of potential effects on setting of NIAH structures within 5km of the nearest proposed turbine.

| Reg. No. | Date      | Name                          | Type                        | Townland             | Number of Turbines Theoretically Visible | DISTANCE TO TURBINE (m) | Theoretical Significance of Effect |
|----------|-----------|-------------------------------|-----------------------------|----------------------|------------------------------------------|-------------------------|------------------------------------|
| 40908602 | 1840-1860 |                               | bridge                      | CROAGHONAGH, MEENBOG | 16-19                                    | 740                     | Moderate                           |
| 40908604 | 1860-1900 |                               | bridge                      | CROAGHONAGH          | 16-19                                    | 2636                    | Moderate                           |
| 40908605 | 1700-1760 | Old Barracks                  | barracks                    | CASHELNAVEEN         | 16-19                                    | 2930                    | Moderate                           |
| 40907714 | 1960-1965 | Church of the Ascension       | church/chapel               | CARRICKMAGRATH       | 16-19                                    | 4533                    | Not Significant                    |
| 40907707 | 1850-1860 | Meencarrigach National School | school                      | MEENCARGAGH (DOOISH) | 0                                        | 4754                    | N/A                                |
| 40908501 | 1880-1890 |                               | viaduct, bridge, embankment | KEADEW UPPER         | 0                                        | 4789                    | N/A                                |

Table 14-16: Table of potential effects on setting of Historic Gardens within 5km of the nearest proposed turbine.

| Historic Garden Name | ITM E  | ITM N  | Number of Turbines Theoretically Visible | Distance to Turbine (m) | Theoretical Significance of Effect |
|----------------------|--------|--------|------------------------------------------|-------------------------|------------------------------------|
| Meenglass            | 611149 | 890593 | 16-19                                    | 3947                    | Slight                             |

### Mitigation Measures

No mitigation proposed.

### Residual Effect

The residual effects will be Moderate to Not Significant, Negative, Long Term as identified in the table of Potential Effects (Table 14-15 and Table 14-16) and as discussed above.

### Significance of Effects

The overall significance of effects ranges from Moderate to Not Significant.

#### 14.4.4.9 Industrial Heritage (NI)

Thirteen (13) Industrial Heritage (NI) sites are located within 5km of the nearest proposed turbine in County Tyrone. The sites comprise road bridges, mills (tuck and corn), a lime kiln, still house and a dam. The nearest of these sites comprises a bridge at Sixth Corgary or Second Croagh townland which is located c. 1km from the nearest proposed turbine, T19.

Both the distance to the nearest proposed turbine and the number of turbines theoretically visible from cultural heritage assets are used to arrive at a level of potential effect on setting (see Table 14-4). The theoretical significance of effects to the industrial heritage sites located within 5km of the nearest proposed turbine is listed in Table 14-17. The theoretical significance of effects to Industrial Heritage sites (NI) located within 5km of the nearest proposed turbine ranges from Moderate to Not Significant, Negative, Long Term. By virtue of its distance (1km) to the nearest proposed turbine the potential effect identified for the bridge at Sixth Corgary or Second Croagh townland when using Table 14-4 would be Significant. The nature of the structure (road bridge) is such that it is not visually dominant in the landscape and its sensitivity is considered Medium-Low (see Table 14-2). In this regard the potential visual effect to the setting of this structure is regarded as Moderate. It should also be noted that existing natural screening and vegetation will mitigate the potential visual effect to the wider setting of the bridge and in reality the significance of effect will be less.

Table 14-17: Table of potential effects on setting of Industrial Heritage sites (NI) within 5km of the nearest proposed turbine.

| IH Ref.          | Type                     | Townland                       | Number of Turbines Theoretically Visible | Distance to Turbine (m) | Theoretical Significance of Effect |
|------------------|--------------------------|--------------------------------|------------------------------------------|-------------------------|------------------------------------|
| IHR 04282:000:00 | Bridge                   | Sixth Corgary or Second Croagh | 16-19                                    | 1047                    | Moderate                           |
| IHR 04485:000:00 | Ruins of Old Still House | Slievedoo                      | 6-10                                     | 2246                    | Slight                             |

| IH Ref.          | Type                   | Townland                       | Number of Turbines Theoretically Visible | Distance to Turbine (m) | Theoretical Significance of Effect |
|------------------|------------------------|--------------------------------|------------------------------------------|-------------------------|------------------------------------|
| IHR 04489:000:00 | Corn Kiln              | Slievedoo                      | 0                                        | 2895                    | N/A                                |
| IHR 04490:000:00 | Bridge                 | Meenakeeran / Slievedoo        | 6-10                                     | 3079                    | Not Significant                    |
| IHR 04283:000:00 | Corn Kiln              | Sixth Corgary or Second Croagh | 1-5                                      | 3120                    | Not Significant                    |
| IHR 04284:002:00 | Dam                    | SIXTH CORGARY OR SECOND CROAGH | 1-5                                      | 3299                    | Not Significant                    |
| IHR 04284:003:00 | Millrace               | SIXTH CORGARY OR SECOND CROAGH | 1-5                                      | 3351                    | Not Significant                    |
| IHR 04284:000:00 | Tuck Mill site         | Sixth Corgary or Second Croagh | 1-5                                      | 3377                    | Not Significant                    |
| IHR 04284:001:00 | Mill (Tuck/Fulling)    | SIXTH CORGARY OR SECOND CROAGH | 1-5                                      | 3384                    | Not Significant                    |
| IHR 04285:000:00 | Bridge                 | Fifth Corgary or First Croagh  | 6-10                                     | 3653                    | Not Significant                    |
| IHR 04492:000:00 | Lime Quarry & Limekiln | Slievedoo                      | 0                                        | 4319                    | N/A                                |
| IHR 04486:000:00 | Corn Kilns             | Meenakeeran                    | 0                                        | 4684                    | N/A                                |
| IHR 04493:000:00 | Bridge                 | Slievedoo                      | 0                                        | 4930                    | N/A                                |

### Mitigation Measures

No mitigation proposed.

### Residual Effect

The residual effects will be Moderate to Not Significant, Negative, Long Term as identified in the table of Potential Effects (Table 14-17) and as discussed above.

## Significance of Effects

The overall significance of effects ranges from Moderate to Not Significant.

### 14.5 Cumulative Effects – Prospective Development

A cumulative effect is defined as ‘The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects.’ (EPA 2022). Cumulative effects 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 vicinity of the Prospective Development. The potential cumulative effects between the Prospective Development and the other projects described in Chapter 2 of the EIAR, hereafter referred to as the other projects, have been considered in terms of effects on Cultural Heritage.

The other projects considered in relation to the potential for in combination effects arising from construction, operational and decommissioning phases of the Prospective Development and for which all relevant data was reviewed include those listed below.

#### 14.5.1 Non-Wind Farm Projects within 20km

A list of all extant planning applications within 20km of the proposed turbines was considered in terms of cumulative effects. The majority of these applications comprise agricultural and residential developments such as single dwelling houses, and agricultural buildings in addition to other larger developments such as quarries and larger residential developments, etc. Such developments if located in proximity to archaeological monuments or other cultural heritage assets may have the potential to directly or indirectly affect such features. It is considered, however, that the planning authority would have regard to the protection of any known or unknown cultural heritage sites through the requirement for assessments or implementation of appropriate mitigation measures through the planning process or the discharge of conditions attached to a grant of planning permission, where relevant.

#### 14.5.2 Other Wind Farms

A number of other existing, permitted or proposed wind farms are located within 20km of the proposed turbines as detailed in Section 2.10 of Chapter 2.

#### 14.5.3 Cumulative Effects (Direct Effects – Construction stage)

The interaction between other projects and the Prospective Development has been considered in order to assess potential for cumulative effects. These included wind farms within 20km of the proposed turbines. Direct effects for the Prospective Development are considered to be confined to within the Site and relate to construction effects.

##### 14.5.3.1 Cumulative effects (direct) considering other windfarms within 20km

##### 14.5.3.1.1 Cumulative effects to the Recorded Archaeological Resource

No recorded archaeological assets are located within the Wind Farm Site and no potential direct effects to such assets as a result of the Prospective Development are identified. When the Prospective

Development is considered cumulatively with other projects therefore, it does not result in direct cumulative effects since none were identified in the first place.

#### 14.5.3.1.2 **Cumulative effects on potential sub-surface archaeology**

Ground works for Meenbog Wind Farm have been substantially completed and were subject to archaeological monitoring, during which time no sub-surface archaeological finds or features were uncovered. The ground works which will be required as part of the Prospective Development will involve peat removal. The potential exists for the presence of sub-surface archaeological finds, structures and deposits within the peat, particularly where deeper peat remains in situ. Potential direct effects identified at the construction stage of the Prospective Development are those which may occur to hitherto unknown sub-surface archaeological finds, features or deposits, if present. In the absence of appropriate mitigation measures the potential effect is considered to be direct, negative and permanent and would result in a Significant effect to such features if present. After the mitigation measures are implemented, however, these potential effects will be Slight. The overall significance of effects is therefore Slight which is Not Significant.

The same potential construction stage effect could be identified for the other wind farm projects since groundworks could impact on hitherto unknown archaeological, finds, features or deposits or other cultural heritage assets. In this regard there could potentially be a cumulative effect when the Prospective Development is considered cumulatively with other wind farm sites. Mitigation measures seek to alleviate such negative effects if not remove the effect altogether and therefore there will be no significant cumulative effects on sub-surface remains, particularly given that the ground works for Meenbog Wind Farm, including the 110kv underground grid connection, are substantially complete and no direct effect to sub-surface archaeology as a result of same was identified.

If the mitigation measures prescribed in this EIAR are implemented then cumulative direct effects to unknown sub-surface archaeology will not occur, regardless of the other identified cumulative projects.

### 14.5.4 **Cumulative Effects (Indirect Effects – Operational Stage)**

Indirect effects on setting occur at the operational stage of the development (when turbines are operational). In this regard in order to assess overall cumulative effects on archaeology and cultural heritage, the Prospective Development is considered in the context of its operation in combination with other wind farms within 20km of the proposed turbines. See Chapter 2 for detail regarding the methodology for cumulative assessment.

#### 14.5.4.1 **UNESCO World Heritage sites (tentative)**

No UNESCO World Heritage Sites (WHS) or those on the Tentative list are located within the Wind Farm Site or within 20km of same. The nearest WHS (Tentative list) comprises the Passage Tomb Landscape of County Sligo which is situated c.61km to the south-west. Given the considerable distance between the Wind Farm Site and the Passage Tomb Landscape of County Sligo it is not considered that potential visual effects to that landscape will occur as a result of the proposed turbines. As no potential visual effects as a result of the Prospective Development have been identified no cumulative effects will occur when considered with other projects.

#### 14.5.4.2 **National Monuments**

No National Monuments, those subject to a Preservation Order or NI State Care sites are located within the Wind Farm Site or within 10km of the nearest proposed turbine. The nearest monument in State Care (NM No. 174) comprises Donegal Castle which is located over 15km to the south-west of T3. The

ZTV demonstrates no theoretical visibility of the proposed turbines from the monument therefore potential visual effects to its setting are not identified. As no potential visual effects as a result of the Prospective Development have been identified no cumulative effects will occur when considered with other projects.

The ZTV demonstrates theoretical visibility of 16-19 proposed turbines from the nearest monument subject to a Preservation Order (PO No. 5/1973). Given the distance of the monument from the nearest proposed turbine (c. 11km) no potential visual effects to its immediate setting will occur. Furthermore, the relatively low-visibility nature of the monument and the intervening distance is such that potential visual effects to its wider setting are considered to be Imperceptible. When considered cumulatively with other wind farms within 20km of the proposed turbines no increase to the Imperceptible effect to the wider setting of this monument is identified.

#### 14.5.4.3 Recorded Monuments

A total of eighteen (18) recorded monuments are located within 5km of the nearest proposed turbine. This number comprises 15 recorded monuments in County Donegal and three monuments (NI SMR) in County Tyrone. The potential effects to the wider setting of recorded monuments within 5km ranges from Slight-Not Significant, Negative, Long Term, with no potential effects determined for monuments located where no turbines will theoretically be visible.

When considered cumulatively with other wind farms within 20km of the proposed turbines the ZTV demonstrates theoretical visibility of the Prospective Development turbines and the operational Carr, Meenanilta, Meenanilta 2 and Golagh turbines. In this regard there is potential for cumulative effects to the wider setting of the recorded monuments within the 5km study area. No cumulative effects to the immediate setting of the monuments are identified. Given the distance of the majority of the existing turbines from the recorded monuments in the 5km study area no significant cumulative effects to their wider setting are anticipated.

#### 14.5.4.4 Archaeological Landscapes

The Prospective Development is not located in or immediately adjacent to areas which have been designated as Archaeological Landscapes. Potential visual effects to any such landscapes will therefore not occur. In this regard no potential cumulative effects will occur when the Prospective Development is considered with other wind farms within 20km.

#### 14.5.4.5 Protected Structures, Listed Buildings (NI) NIAH and Industrial Heritage sites (NI)

No Protected Structures or Listed Buildings (NI) are located within the Wind Farm Site. Furthermore, no Protected Structures are located within 5km of the nearest proposed turbine. Only one Listed Building (NI)(HB10/01/014) comprising a thatched cottage is located within 5km of the nearest proposed turbine. The immediate setting of the Listed Building will not be affected, however, a change to the wider setting within which it is located is acknowledged and is considered to be Not Significant, Negative, Long Term.

No NIAH structures, historic gardens or historic parks and gardens (NI) are located within the Site. Six (6) NIAH structures are located within 5km of the nearest proposed turbine. The nearest of the structures comprises a bridge (Reg. 40908602) at Croaghonagh/Meenbog townland. Only one historic garden, Meenglass, is located within 5km of the nearest proposed turbine and is situated c. 3.9km to the north-east of T19. The theoretical significance of effects on the setting of NIAH structures and historic gardens ranges from Moderate to Not Significant, Negative, Long Term.

Thirteen (13) Industrial Heritage (NI) sites are located within 5km of the nearest proposed turbine in County Tyrone. The sites comprise road bridges, mills (tuck and corn), a lime kiln, still house and a dam. The theoretical significance of effects to Industrial Heritage sites (NI) located within 5km of the nearest proposed turbine ranges from Moderate to Not Significant, Negative, Long Term.

When considered cumulatively with other wind farms within 20km of the proposed turbines the ZTV demonstrates theoretical visibility of the Prospective Development turbines and the operational Cark, Meenanilta, Meenanilta 2 and Golagh turbines. In this regard there is potential for cumulative effects to the wider setting of the architectural and built heritage assets within 5km. Given the distance of the majority of the existing turbines from the architectural and built heritage assets in the 5km study area no significant cumulative effects to their wider setting are anticipated.

## 14.6 In-Cumulation Effects

This section considers the in-cumulation effect of the combination of the Existing Development and Prospective Development (the Subject Development).

Table 14-18: Table of in-cumulation effects (direct and indirect).

| Direct / Indirect Effects | Existing Development                                                                                                                              | Prospective Development                                                                                                                                                                                                                                                                                                                                                                                   | Subject Development                                                                                                                                           |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Direct Effects</b>     | No direct effects to the recorded or unrecorded Cultural Heritage resource as a result of the Existing Development have been identified           | A potential Long-term, Negative and Slight direct residual effect to sub-surface archaeology as a result of the Prospective Development has been identified which is Not Significant.                                                                                                                                                                                                                     | The potential In-Cumulation effects to this aspect of the Cultural Heritage resource from the Subject Development is also considered to be Not Significant.   |
| <b>Indirect Effects</b>   | No indirect visual effects to the recorded or unrecorded Cultural Heritage resource as a result of the Existing Development have been identified. | No potential visual effects to UNESCO WHS on the Tentative List, National Monuments, or NI State Care sites as a result of the Prospective Development have been identified. An Imperceptible, Negative, Long Term visual effect to one monument subject to a Preservation Order is identified.<br><br>Potential visual effects to recorded monuments, Protected Structures, NIAH structures and historic | The potential In-Cumulation effects to these aspects of the Cultural Heritage resource from the Subject Development is also considered to be Not Significant. |

|  |  |                                                                                                                                                                         |  |
|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  |  | gardens and Industrial Heritage (NI) sites as a result of the Prospective Development range from Slight-Not Significant, Negative, Long Term, which is Not Significant. |  |
|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

14.7

## Cumulative Effects – Subject Development

The potential cumulative effects between the Subject Development and the other projects described in Chapter 2 of the EIAR, hereafter referred to as the other projects, have been considered in terms of effects on Cultural Heritage.

The other projects considered in relation to the potential for in combination effects arising from construction, operational and decommissioning phases of the Subject Development and for which all relevant data was reviewed include those referred to in Section 14.5 above and listed in Chapter 2 of the EIAR and the rEIAR.

14.7.1

### Direct Effects

No potential direct effects to the recorded Cultural Heritage resource as a result of the Existing Development or the Prospective Development have been identified. In this regard there is no potential for direct effects to this aspect of the Cultural Heritage resource as a result of the Subject Development. As no direct effects as a result of the Subject Development are identified there is no potential for cumulative effects when considered with the other projects.

No potential direct effects to potential sub-surface archaeology as a result of the Existing Development have been identified. A potential direct effect to sub-surface archaeology as a result of the Prospective Development was identified, the residual effect of which after the implementation of mitigation measures is considered to be Slight which is Not Significant. The Subject Development has the same potential for cumulative effects as the Prospective Development, however, if the mitigation measures prescribed in this EIAR are implemented then cumulative direct effects to unknown sub-surface archaeology will not occur, regardless of the other identified cumulative projects.

14.7.2

### Indirect Effects

No potential indirect effects to the Cultural Heritage resource as a result of the Existing Development have been identified. No potential visual effects to UNESCO WHS on the Tentative List, National Monuments, or NI State Care sites as a result of the Prospective Development have been identified. An Imperceptible, Negative, Long Term visual effect to the wider setting of one monument subject to a Preservation Order is identified. Potential visual effects to recorded monuments, Protected Structures, NIAH structures and historic gardens and Industrial Heritage (NI) sites as a result of the Prospective Development range from Slight-Not Significant, Negative, Long Term, which is Not Significant. The Subject Development has the same potential for cumulative effects as the Prospective Development, however, as noted in Section 14.5.4 above significant cumulative effects are not identified.

14.8

## Transboundary Effects

The potential for transboundary effects to the Cultural Heritage resource as a result of the Subject Development has also been assessed as part of the Cultural Heritage Study Area.

### 14.8.1 Direct Effects

No recorded or unrecorded Cultural Heritage assets which are located in another jurisdiction are located within the Subject Development therefore direct effects to same as a result of either the Existing or Prospective Development have been identified. There is no potential, therefore for potential direct transboundary effects.

### 14.8.2 Indirect Effects

No indirect visual effects to the recorded or unrecorded Cultural Heritage resource, including those in another jurisdiction, as a result of the Existing Development have been identified. No potential visual effects to NI State Care sites as a result of the Prospective Development have been identified. Potential visual effects to the wider setting of Industrial Heritage (NI) sites as a result of the Prospective Development ranges from Moderate to Not Significant, Negative, Long Term which is Not Significant. There is no potential therefore for Significant transboundary indirect effects as a result of the Subject Development.

## 14.9 Decommissioning Phase

There will be no significant potential effects to the archaeological, architectural and cultural heritage environment during the decommissioning phase of the Prospective Development. Any potential direct effects will already have been resolved through mitigation measures during the construction phase. Therefore, there is no potential for any effects to arise during the decommissioning phase.

## 14.10 Conclusion

This Cultural Heritage chapter was prepared by Tobar Archaeological Services Ltd. It presents the results of an archaeological, architectural and cultural heritage impact assessment of the Prospective Development. The assessment was based on desktop research, field surveys, the results of monitoring of ground works (Appendix 14-2 of this EIAR: Delany, 2023), GIS based mapping, ZTV and was also assisted by representative photomontages. A detailed examination of the available baseline data was undertaken in addition to a comprehensive site inspection. The latter comprised a walk-over survey of the Site for the 2017 EIAR and a subsequent visual inspection as part of this assessment.

Where potential effects have been identified, such as to potential sub-surface archaeology, appropriate mitigation measures have been recommended in order to minimise any such effects. Proposed mitigation comprises archaeological monitoring of any remaining construction stage ground works.

Potential indirect effects on the setting of any UNESCO World Heritage Sites and those on a Tentative List within 20km, National Monuments within 10km, recorded monuments within 5km and RPS/NIAH structures within 5km were included in order to assess potential effects on setting in the wider landscape. The ZTV demonstrates theoretical visibility of the proposed turbines from some of the cultural heritage assets within 5km. Both the distance to the nearest turbine and the number of turbines visible from each cultural heritage asset were used to arrive a level of potential effect on setting. Potential effects on setting are based on the precautionary scenario in that natural screening, boundaries, buildings and vegetation are not taken into account in the ZTV model and in reality the potential effect is likely to be less. Furthermore, many of these monuments may not be readily discernible in the landscape which further ameliorates effects on setting.

An assessment of potential cumulative effects was also undertaken taking into consideration other planning applications and identified cumulative wind farm projects within 20km. While some potential cumulative visual effects to the wider setting of cultural heritage assets are possible when considered

with the identified cumulative wind farm projects, no significant cumulative effects have been identified and no cumulative effects to the immediate setting of cultural heritage assets will occur.

No significant direct or indirect effects to the recorded cultural heritage resource as a result of the Prospective Development have been identified. Where potential direct effects to sub-surface archaeology have been identified appropriate mitigation measures are proposed in order to ameliorate this potential effect.

Potential transboundary and in-cumulation effects have also been considered and no significant effects have been identified.

14.11

## EIA Classification Summary

Please see the below table for a summary of all identified effects for the Prospective Development relating to cultural heritage.

Table 14-19 Impact Assessment Classification Summary

| Cultural Heritage                                            | Pre-Mitigation Effect                       | Section Reference | Residual Effect                             | Significant     |
|--------------------------------------------------------------|---------------------------------------------|-------------------|---------------------------------------------|-----------------|
| <b>Construction Phase</b>                                    |                                             |                   |                                             |                 |
| UNESCO WHS and those on the Tentative List                   | Neutral                                     | Section 14.4.3.1  | None                                        | Not Significant |
| National Monuments and those Subject to a Preservation Order | Neutral-Imperceptible                       | Section 14.4.3.1  | Imperceptible                               | Not Significant |
| Recorded Monuments                                           | Neutral                                     | Section 14.4.3.1  | None                                        | Not Significant |
| Previously Unrecorded Monuments                              | Neutral                                     | Section 14.4.3.2  | None                                        | Not Significant |
| Sub-surface Archaeology                                      | Permanent, Significant, Negative            | Section 14.4.3.3  | Long term, Slight, Negative                 | Not Significant |
| Protected Structures & Listed Buildings (NI)                 | Neutral                                     | Section 14.4.3.4  | None                                        | Not Significant |
| NIAH Structures and Historic Gardens                         | Neutral                                     | Section 14.4.3.4  | None                                        | Not Significant |
| Industrial Heritage (NI)                                     | Neutral                                     | Section 14.4.3.4  | None                                        | Not Significant |
| <b>Operational Phase</b>                                     |                                             |                   |                                             |                 |
| UNESCO WHS and those on the Tentative List                   | Neutral                                     | Section 14.4.4.1  | None                                        | Not Significant |
| National Monuments and those Subject to a Preservation Order | Neutral                                     | Section 14.4.4.2  | None                                        | Not Significant |
| Recorded Monuments                                           | Slight-Not Significant, Negative, Long Term | Section 14.4.4.3  | Slight-Not Significant, Negative, Long Term | Not Significant |

|                                              |                                                  |                  |                                                  |                 |
|----------------------------------------------|--------------------------------------------------|------------------|--------------------------------------------------|-----------------|
| Previously Unrecorded Monuments              | Neutral                                          | Section 14.4.4.4 | None                                             | Not Significant |
| Sub-surface Archaeology                      | Neutral                                          | Section 14.4.4.5 | None                                             | Not Significant |
| Archaeological Landscapes                    | Neutral                                          | Section 14.4.4.6 | None                                             | Not Significant |
| Protected Structures & Listed Buildings (NI) | Not Significant, Negative, Long Term             | Section 14.4.4.7 | Not Significant, Negative, Long Term             | Not Significant |
| NIAH Structures and Historic Gardens         | Moderate to Not Significant, Negative, Long Term | Section 14.4.4.8 | Moderate to Not Significant, Negative, Long Term | Not Significant |
| Industrial Heritage (NI)                     | Moderate to Not Significant, Negative, Long Term | Section 14.4.4.9 | Moderate to Not Significant, Negative, Long Term | Not Significant |
| <b>Decommissioning Phase</b>                 |                                                  |                  |                                                  |                 |
| N/A                                          | N/A                                              | Section 14.9     | N/A                                              | N/A             |