

14.

CULTURAL HERITAGE

14.1

Introduction

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

The purpose of this chapter is to assess the potential direct and indirect effects of the Existing Development on the surrounding archaeological, architectural and cultural heritage landscape. The assessment is based on a desktop review of the available cultural heritage and archaeological data, previous field inspection for the 2017 EIAR and the results of archaeological monitoring of ground works during the construction stage of the Existing Development. An assessment of potential effects, including cumulative effects, is presented.

As detailed in Section 1.1.1 in Chapter 1 of this rEIAR, 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 Existing Development is provided in Chapter 4 of this rEIAR.

14.1.1

Existing 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.

The Wind Farm Site and the Grid Connection Site are shown in Figure 14-1 below.

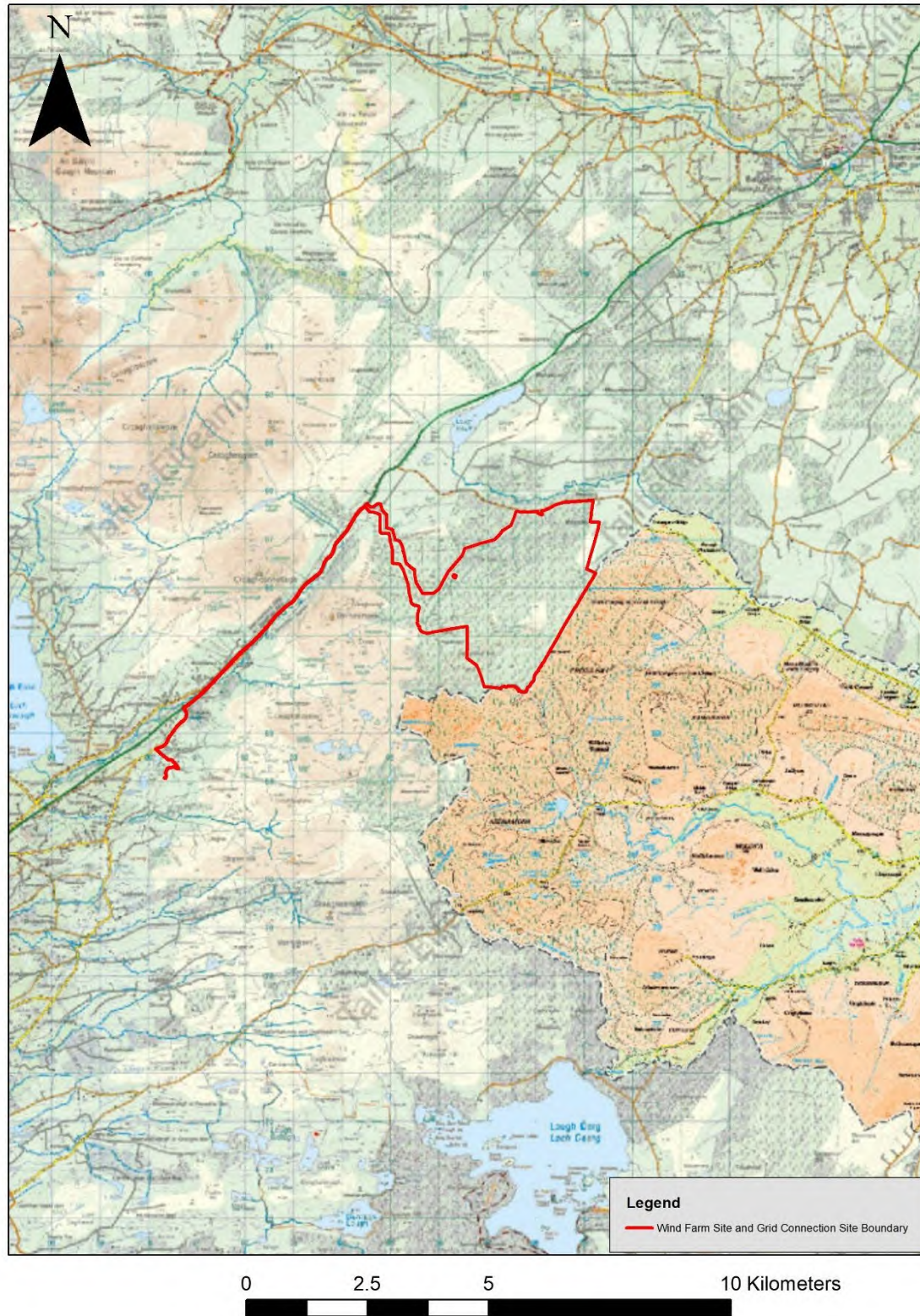


Figure 14-1: Wind Farm Site and Grid Connection Site location map.

14.1.2 Statement of Authority

This chapter of the rEIAR 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 Existing Development on cultural heritage has been carried out in accordance with the various planning policies and strategy guidance detailed in Section 1.2 in Chapter 1 of this rEIAR, 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.
- 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 31st 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). 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

AH-P-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.

AH-P-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

AYH-P-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:

- 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.
- Be accompanied by a long-term management plan that incorporates appropriate protections for the heritage site.
- 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 rEIAR 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 2.8 of this rEIAR. 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, Department of Housing Local 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.	Throughout

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 Existing Development are complete it is not considered that geophysical survey or advance archaeological test excavation are appropriate or necessary assessment techniques in this instance. Archaeological monitoring of ground works associated with the partly constructed Existing Development was carried out (Delany 2023) and did not result in the uncovering of any archaeological finds or features. A copy of the Delany (2023) archaeological monitoring report is included as Appendix 14-1 to this rEIAR.

14.2

Assessment Methodology

The assessment of the Cultural Heritage, including archaeology and architecture, of the Existing Development primarily included geographic information system (GIS) mapping and desk-based research in addition to field inspection carried out during the previous assessment the Wind Farm Site and the Grid Connection Site for the 2017 EIAR (<https://www.pleanala.ie/en-ie/case/300460>).

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, architectural 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 Cultural Heritage.

14.2.2 Desktop Assessment

The desktop assessment for the Existing 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)

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 Record 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 at www.heritagedata.maps.arcgis.com was also consulted.

A review of all National Monuments in State Care and those subject to Preservation Orders in County 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 9th 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 Wind Farm Site and Grid Connection Site these files, as available on Heritage Maps (www.heritagemaps.ie), were consulted for each townland within and immediately adjacent to the Wind Farm Site and Grid Connection Site (accessed 9th March 2026).

14.2.2.4 Archaeological Inventory Series

Further information on archaeological sites may be obtained 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 (RPS)

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 Existing Development. The dataset for the Donegal Record of Protected Structures was added to the base mapping for the Existing 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 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 Wind Farm Site or Grid Connection 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 Department of Housing, Local Government and Heritage (DHLGH). The NIAH database was consulted for all townlands within and adjacent to the Wind Farm Site and the Grid Connection Site. The NIAH survey has been published and the digital dataset was downloaded on to the base mapping for the Subject Development (www.buildingsofireland.ie). The National Inventory of Architectural Heritage (NIAH) is a state initiative under the administration of the Department of Housing, Local Government and Heritage (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.

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 for the 2017 EIAR. 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 and Grid Connection Site were again inspected in December 2025 by Miriam Carroll of Tobar Archaeological Services Ltd. This involved a visual inspection of the Existing Development and a photographic record of same. 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. 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 14.3.1.5 for further detail).

14.2.4 Limitations Associated with the Assessment

14.2.4.1 Field Assessment

Access to all relevant areas of the Wind Farm Site and Grid Connection Site for the purposes of a visual inspection was possible. It should be noted, however, that the Existing Development 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. In this regard there are no limitations associated with the field 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 Cultural Heritage environment are assessed using the criteria as set out in EPA, 2022 and described in Section 1.7 of Chapter 1 of this rEIAR. The following terminology is used when describing the likely effects of the Existing 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)**

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 Existing Development, which is the subject of this assessment, comprises all of the works carried out to date at the Wind Farm Site and Grid Connection Site. Those works are confined to within the Wind Farm Site and Grid Connection Site and are not considered to be visually intrusive in the wider landscape when compared to structures such as turbines and other tall vertical elements which are theoretically visible within the landscape over long distances. In this regard,

the below distances (Table 14-3) used in the assessment of effects on setting are regarded as appropriate in terms of the Existing Development being assessed and are based on professional judgement.

Table 14-3: Distance considered according to sensitivity

Cultural Heritage Asset	Distance Considered from the Existing Development
UNESCO World Heritage Sites (including tentative sites)	2km
National Monuments (State Ownership and Preservation Order Sites)	1km
Sites and Monuments and Recorded Monuments, RPS	Within the Wind Farm Site and Grid Connection Site
NIAH structures	Within the Wind Farm Site and Grid Connection Site
Undesignated sites, if relevant	500m

14.3 Existing Environment

14.3.1 Archaeological, Architectural and Cultural Heritage

A number of documentary and cartographic sources (as listed in Section 14.2 above) were utilised in order to ascertain the potential for the presence of architectural /cultural heritage features on or within the Wind Farm Site and Grid Connection Site. 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 and NISMR, and newly discovered archaeological sites. Cultural heritage includes items such as buildings, farmhouses, gates, bridges, piers, and stone field boundaries. Each of these are addressed in the following sections. Sub-surface archaeology is also addressed in the assessment. As the Wind Farm Site and Grid Connection Site are located entirely within County Donegal cultural heritage assets located in Northern Ireland, such as Industrial Heritage sites (NI) and Listed Buildings (NI), are largely scoped out given that they do not fall within the distances outlined in Table 14-3 above. For completeness, however, the nearest of such assets is provided in the relevant sections below.

14.3.1.1 UNESCO World Heritage Sites and those on Tentative List

No UNESCO World Heritage Sites (WHS) or those on the Tentative list are located on or within 2km of the Wind Farm Site or the Grid Connection Site. The nearest WHS (Tentative list) comprises the Passage Tomb Landscape of County Sligo which is situated c.61km to the south-west.

14.3.1.2 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. No National Monuments or those subject to a Preservation Order are located within the Wind Farm Site or within 1km of the Wind Farm Site. No monuments in State Care NI are located within 1km of the Wind Farm Site. Similarly, no National Monuments in State Care, monuments subject to a Preservation

Order or monuments in State Care NI are located along the existing 110kV underground grid connection

The nearest monument in State Care (NM No. 174) comprises Donegal Castle which is located over 8km to the south-west of the Grid Connection Site. The nearest monument subject to a Preservation Order is located c. 10km to the north-east of the Wind Farm Site.

14.3.1.3 Recorded Monuments

No recorded monuments (SMR or NI SMR) are located within the Wind Farm Site (Figure 14-2). The nearest monument TY014-002 is situated c. 1.2km to the south-west of the Wind Farm Site in County Tyrone and comprises a possible crannóg detected by aerial photography (Figure 14-3).

One recorded monument DG094-026— Kiln is located along the Grid Connection Site (Figure 14-4). This monument is located adjacent to the N15 National Road along which the existing Grid Connection Site extends and was excavated and removed in advance of the Clar-Barnesmore road realignment. The monument is described on the HEV as follows:

DG094-026— : Kiln : KEADEW UPPER

Description: Excavation licence number 99E0379. Excavation was carried out on the site of a drying kiln between 28 June and 3 July 1999, before the proposed Clar-Barnesmore road realignment. Topsoil, sod and a single stone fill of the bowl were removed, exposing a kiln built into a natural ridge of peat. The kiln comprised a circular bowl with outwardly battered sides, built of randomly coursed, small to medium-sized, roughly rectangular stones with two courses of larger stones at the base, and an outwardly splayed, north-west/south-east-aligned flue, built of upright slabs and roofing lintels (only one of which survived). The bowl had been deliberately backfilled. A stone surface built on the peat ridge surrounded the kiln. The feature had been extensively disturbed at the south-east end of the flue by construction works associated with the present N15 embankment and the earlier construction of the embankment for the railway to the south. It was not possible from the evidence gathered to arrive at a definite date for the kiln. (Excavations Bulletin 1999). Declan Moore, IAC, 8 Dungar Terrace, Dun Laoghaire, Co. Dublin.

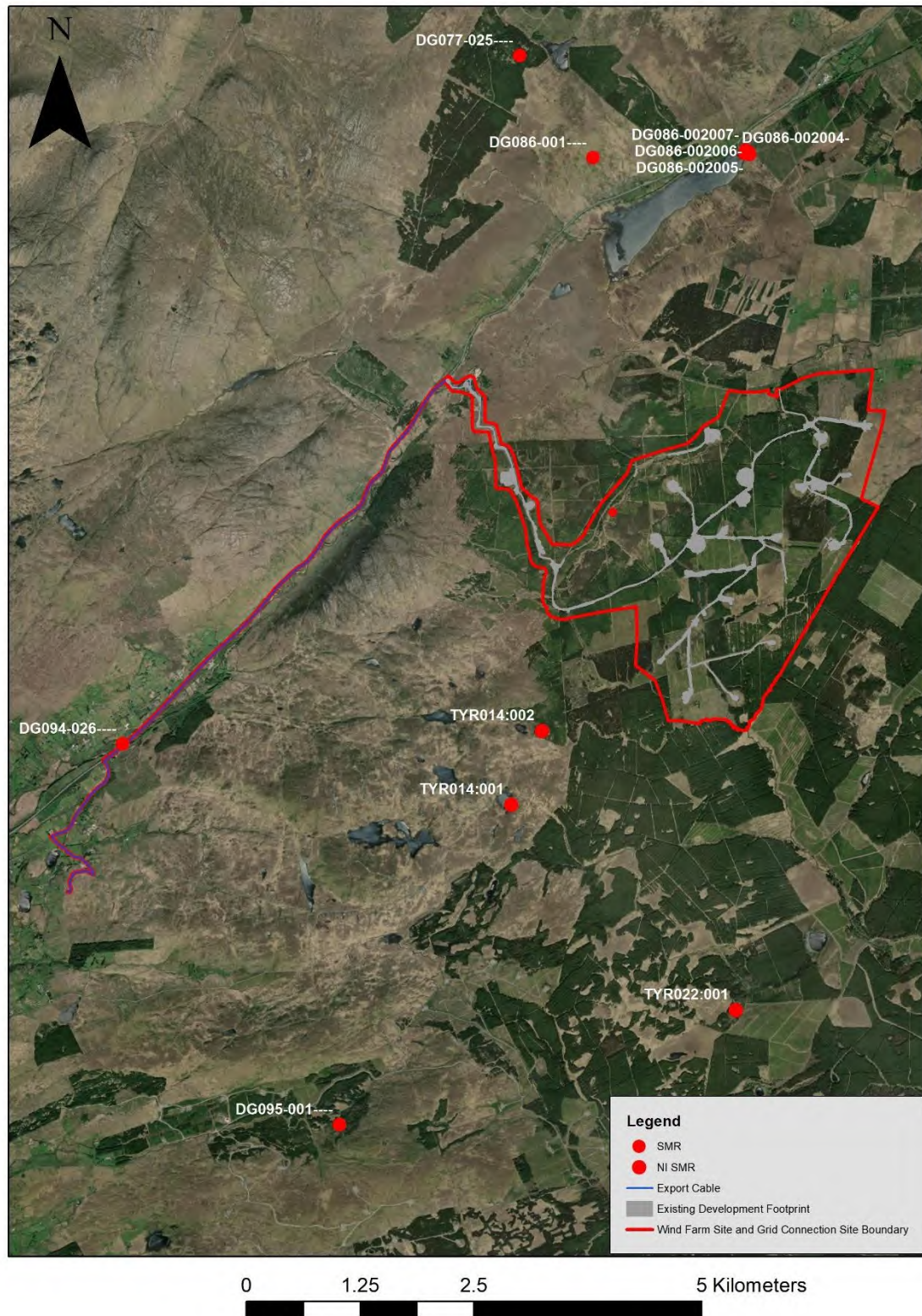


Figure 14-2: Existing Development in relation to SMR and NI SMR.

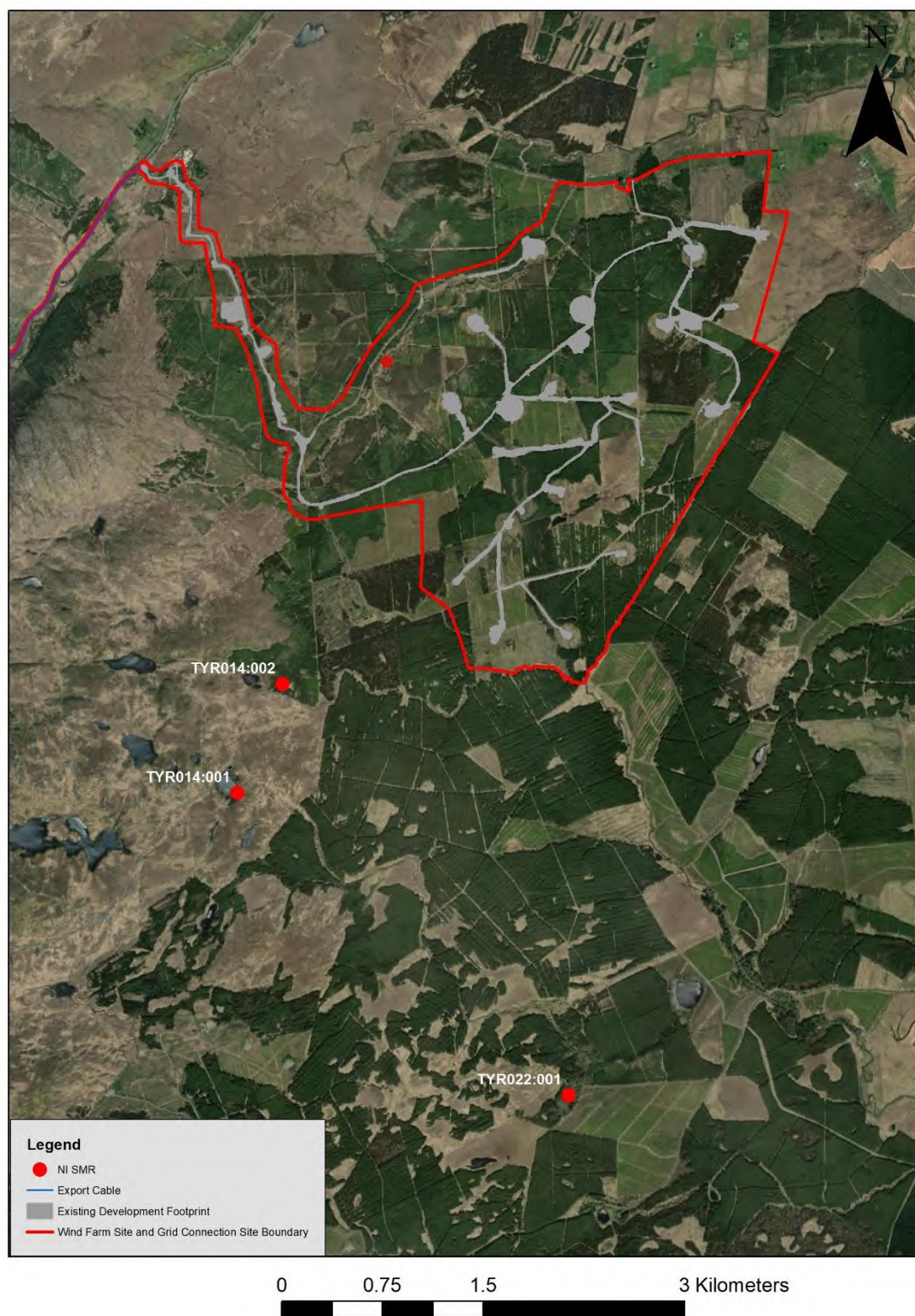


Figure 14-3: Nearest NI SMR monuments to the Wind Farm Site.



Figure 14-4: Recorded monument DG094-026— Kiln located along the existing Grid Connection Site.

14.3.1.4 Archaeological Investigations

Previous Archaeological Surveys

Walk-over surveys of the Wind Farm Site and 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 and Grid Connection Site were 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 and Grid Connection 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 14-1).

Excavations Database

The database of excavations carried out in Ireland (www.excavations.ie) was consulted for any such licensed work which took place on or adjacent to the Wind Farm Site and Grid Connection 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 Delaney

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.

14.3.1.5 Previously Unrecorded Monuments

No previously unrecorded archaeological monuments were noted within the Wind Farm Site during the walk-over surveys carried out by Tobar in 2015 and 2017. Similarly, no previously unrecorded archaeological finds or features were uncovered during archaeological monitoring of ground works associated with the construction of the Existing Development (Delany 2023).

14.3.1.6 Topographical Files of the National Museum of Ireland

The topographical files of the National Museum of Ireland were consulted for archaeological finds from the townlands within or adjacent to the Wind Farm Site and Grid Connection Site. No find spots are recorded from within the Wind Farm Site and Grid Connection Site. One find is recorded from Croaghonagh townland, c. 344m north of the Wind Farm Site (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 at Croaghonagh townland in relation to the Existing Development.

14.3.1.7 Sub-Surface Archaeological Potential

All ground works associated with the Existing Development were subject to archaeological monitoring between November 2019 and October 2022. The monitoring was carried out by Dominic Delaney & Associates under licence from the National Monuments Service (NMS) (see Section 14.3.1.4 above). No archaeological finds or features were uncovered during monitoring of the works. As ground works for the Existing Development have been completed there is no potential for the uncovering of sub-surface archaeology in those areas.

14.3.1.8 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 Existing Development is not located in or immediately adjacent to areas which have been designated as Archaeological Landscapes.

14.3.1.9 Orthophotographic Review

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

14.3.1.10 Protected Structures and Listed Buildings (NI)

No Protected Structures or Listed Buildings (NI) are located on the Wind Farm Site or in close proximity to same, or along the existing Grid Connection route to Cloher substation (Grid Connection Site). The nearest RPS structure (Reg. No. 40800911) to the Wind Farm Site is situated c. 8.5km to the north-east in Stranorlar while the nearest Listed building (NI) (Ref. HB10/01/014) is c. 4.3km to the south-east in Meenablagh or Fourth Corgary townland (Figure 14-6). 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 11th 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.'

14.3.1.11 NIAH Structures and Historic Gardens

No NIAH structures or Historic Gardens are located within the Wind Farm Site. One NIAH structure (Reg. 40908602) consisting of a stone road bridge is located just outside the northern site boundary but is not in the immediate vicinity of any elements of the Existing Development (Figure 14-7). It is described on 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. Tarmac 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.'



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

Two NIAH structures (Reg. 40909423 and 40909424) comprising a milepost and a bridge, respectively are located along the existing Grid Connection route (Grid Connection Site) (Figure 14-8). The milepost is located c. 17m to the west of the route on the roadside while the bridge is located on the route c. 200m to the north-east. The structures are described on www.buildingsofireland.ie as follows:

NIAH Reg. 40909423 Milestone

Description

Freestanding granite milestone on rectangular-plan, erected c. 1775, having pyramidal head.

Inscriptions to the faces now illegible. Located adjacent to the former main road, and to the north-east of Donegal Town close to the south-west end of the Barnesmore Gap.

Appraisal

This milestone is an interesting and subtle historical survival in the rural landscape to the north-east of Donegal Town. Unfortunately the inscriptions are now illegible but the distance would have been in 'Irish Miles', which are longer than the standard mile measurement used today. It probably dates to the second half of the eighteenth-century, a period when the Grand Juries were responsible for a great deal of improvement in the road transport network throughout Ireland, particularly the development of a series of 'turnpike roads' (from 1729) on which milestones are usually found. Milestones appears to be marked along this road on the Taylor and Skinner road maps of 1777 – 1783, although there were no turnpike roads in Donegal before 1805. This may have been 'milestone marker 34' along the main road from Donegal Town to Derry, although it was probably moved to its present location from a site close by due to road widening over the years etc. This simple item of street furniture acts as a subtle historical reminder the great coach travel in Ireland, and is an integral element of the built heritage of the local area.

NIAH Reg. 40909424 Bridge

Description

Double-arched bridge carrying road over tributary of the Lowerymore River, built or rebuilt c. 1860, having diminutive cutwater to central pier. Round-headed arches having dressed rock-faced voussoirs with dressed margins; cement rendered coating to arch barrels. Snecked and/or squared and coursed mildly rock-faced masonry construction to spandrels and abutments; rubble stone construction to parapets with rock-faced stone coping over. Parapets rebuilt in places. Tarmacadam Deck. Located to the north-east of Donegal Town, and at the south-west entrance to the Barnesmore Gap.

Appraisal

This simple double-arched road bridge retains its early character and form, despite some modern alterations, and is an appealing feature in the scenic landscape to the north-east of Donegal Town. It is robustly-constructed in mildly rock-faced snecked and squared coursed 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. The good quality rock-faced voussoirs to the arch and the rock-faced construction to the central cutwater are noteworthy features. Although the use of rock-faced masonry is a feature of the many bridges that were built or altered by the Board of Works during the mid-to-late nineteenth century, and particularly between c. 1847 - 60, the small arches and the construction of this bridge suggests that this bridge is earlier, perhaps dating to the first half of the nineteenth-century. This unassuming rustic bridge is a modest addition to the local area, and is a feature of some picturesque qualities in the scenic landscape to the south-west end of the Barnesmore Gap.



Plate 14-2: Bridge 40909424 within the Grid Connection Site(photo taken by Tobar Archaeological Services in 2014).

The presence of the NIAH structures along the Grid Connection route (Grid Connection Site) is referenced in the archaeological monitoring report compiled by Dominic Delany (2023) which states the following in relation to same:

‘There are two NIAH sites located in the vicinity of the works. None of these sites were impacted by the works’

14.3.1.12 Industrial Heritage (NI)

No Industrial Heritage (NI) sites are located within the Wind Farm Site and Grid Connection Site. The nearest of these sites comprises a bridge (IHR 04282:000:00) at Sixth Corgary or Second Croagh townland which is located c.900m to the east (Figure 14-9).

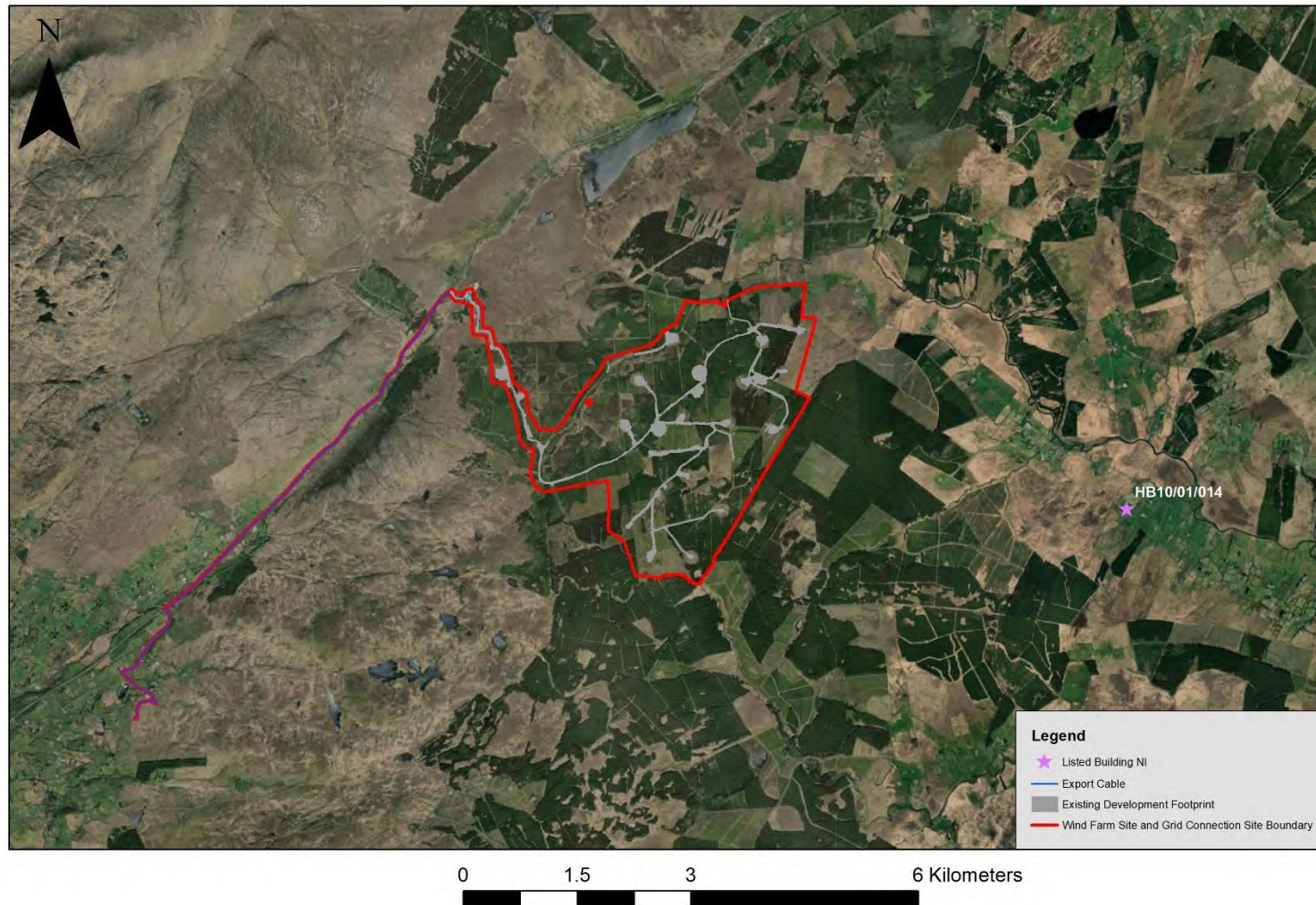


Figure 14-6: Listed Buildings NI in relation to the Existing Development.



Figure 14-7: NIAH Reg. 40908602 in relation to the Existing Development.



Figure 14-8: NIAH Reg. 40909423 and 40909424 in relation to the existing Grid Connection route (Grid Connection Site).



Figure 14-9: Nearest Industrial Heritage (NI) site (IHR 04282:000:00) in relation to Existing Development.

14.3.1.13 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 and Grid Connection Site. Field survey also assisted in determining if any local cultural heritage features were located in the vicinity of same. 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 and were consulted as part of this assessment (<https://downsurvey.tchpc.tcd.ie/>, accessed 9th March 2026). Following Cromwell's invasion of Ireland in the mid 17th 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 14-10 and Figure 14-11). 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 14-12). 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 11th 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 14-10: Wind Farm Site (eastern half) on 1st edition OS background.

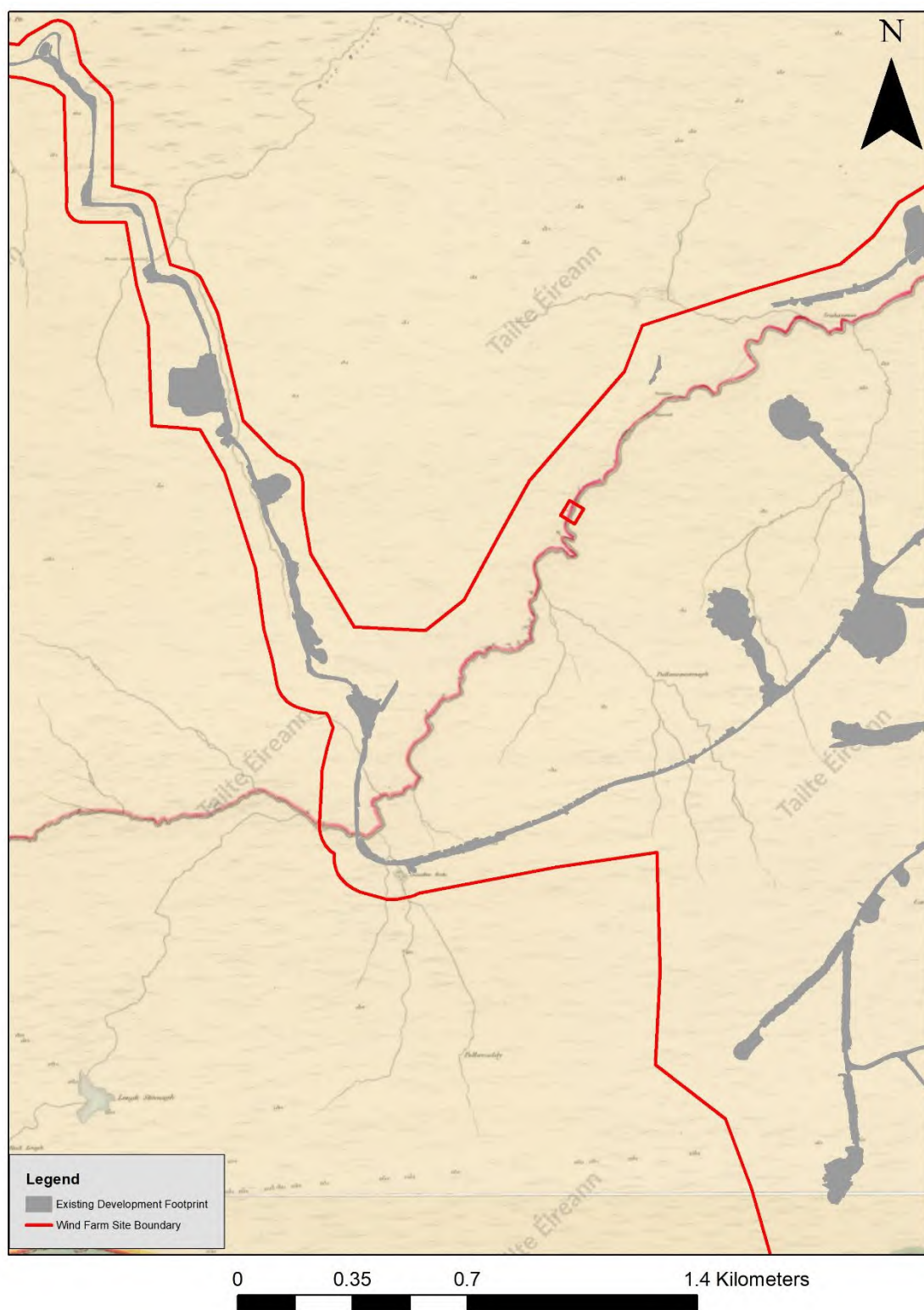


Figure 14-11: Wind Farm Site (western half) on 1st edition OS background.

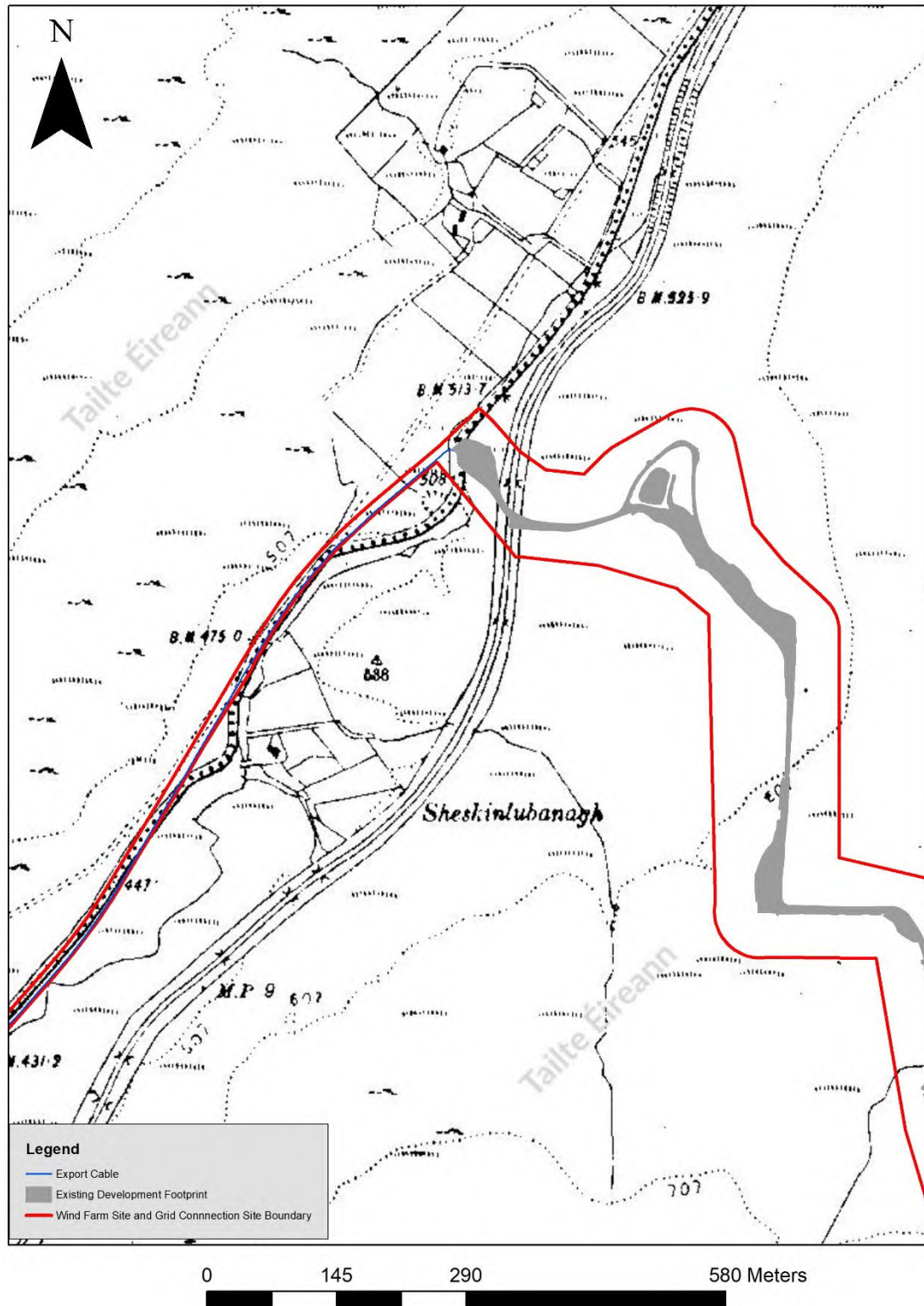


Figure 14-12: Donegal Railway as shown on 3rd edition OS map near to existing Wind Farm site entrance.

14.3.1.14 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. As the Wind Farm Site is located across the townlands of Meenbog and Croaghonagh, townland boundaries between same are also present. The Existing Development infrastructure crosses the townland boundaries in a number of places.

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 and Grid Connection Site (Table 14-4).

Table 14-4: Townlands within the Wind Farm Site and Grid Connection Site and their meanings.

Townland Name	Meaning
MEENBOG (An Mhín Bhog)	Soft misk or field
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 Bui)	Yellow slope or yellow holly
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14.3.1.15 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 11th March 2026).

No stories pertaining to the townlands in which the Existing Development is located are recorded.

14.4 Likely Effects and Associated Mitigation Measures

14.4.1 Do Nothing Scenario

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 the ELAR 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 impacts on visual setting of any cultural heritage assets in the wider landscape. Since these effects are only possible once development is operational, they are considered operational effects. The Existing Development relates to the construction phase only, and therefore no indirect effects were identified.

14.4.3 Construction Phase Potential Effects (Direct)

Direct effects refers to a ‘physical impact’ on a monument or site. The construction phase of a development may consist of earthmoving activities such as topsoil removal and excavation works. This may have a number of potential negative effects on the known and potential archaeological heritage. These are outlined below with the suggested mitigation measures.

14.4.3.1 UNESCO World Heritage Sites and those on Tentative List

No direct effects to UNESCO World Heritage Sites (WHS) or those on the Tentative list are identified.

14.4.3.2 National Monuments

No direct effects to National Monuments, monuments in State Care NI or those subject to a Preservation Order are identified.

14.4.3.3 Recorded Monuments

No direct effects to recorded monuments (SMR or NI SMR) are identified.

14.4.3.4 Sub-surface Archaeological Potential

No direct effects to sub-surface archaeology as a result of the Existing Development are identified.

14.4.3.5 Previously Unrecorded Monuments

No direct effects to this aspect of the archaeological resource as a result of the Existing Development are identified.

14.4.3.6 Protected Structures and Listed Buildings (NI)

No direct effects to Protected Structures or Listed Buildings (NI) are identified.

14.4.3.7 NIAH structures and Historic Gardens

No NIAH structures or Historic Gardens are located within the Wind Farm Site. One NIAH structure (Reg. 40908602) consisting of a stone road bridge is located just outside the northern site boundary but is not in the vicinity of any elements of the Existing Development under assessment. No direct effects to the bridge as a result of the Existing Development are identified.

Two NIAH structures (Reg. 40909423 and 40909424) comprising a milepost and a bridge, respectively are located along the existing Grid Connection route. The milepost is located c. 17m to the west of the route on the roadside while the bridge is located on the route c. 200m to the north-east. The presence of the NIAH structures along the Grid Connection route is referenced in the archaeological monitoring report compiled by Dominic Delany (2023) which states the following in relation to same:

‘There are two NIAH sites located in the vicinity of the works. None of these sites were impacted by the works’

No direct effects to the NIAH sites are therefore identified.

14.4.3.8 Industrial Heritage (NI)

No direct effects to Industrial Heritage (NI) sites are identified.

14.4.3.9 Features of Local Cultural Heritage Merit

No items of potential cultural heritage merit were noted within the Wind Farm Site and Grid Connection Site during the previous walk-over surveys. A short length (c. 120m) of the line of the disused 19th century Donegal Railway extends through the Wind Farm Site boundary close to the existing site entrance. 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) and was preserved in situ. No potential direct effects to any such features as a result of the Existing Development are therefore identified.

14.4.4 Potential Ongoing Effects

There is no potential for ongoing direct effects associated with the Existing Development, as all excavation works associated with the Existing Development have been completed. 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.

Given that the Existing Development predominantly comprises internal roads, hardstand areas and other elements not deemed to be as visually prominent as elements such as turbines, it is not considered that they have the potential to have a significant potential visual effect on the setting of the Cultural Heritage resource. Furthermore, as outlined in Section 14.3, no cultural heritage assets are located within the Wind Farm Site or in close proximity to the same. Additionally, no potential visual effect to those cultural heritage assets on or adjacent to the existing Grid Connection route is identified given the underground nature of same. In this regard, no potential visual effects to the cultural heritage resource as a result of the Existing Development are identified.

14.5 Cumulative Effects – Existing Development

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 Existing Development.

For the assessment of cumulative effects, any other projects (wind energy or otherwise) that were extant or under construction at the same time as the Existing Development have been considered. The cumulative effects of the Existing Development and other relevant projects within 2km of the Wind Farm Site and Grid Connection Site have been assessed. Further information on projects considered as part of the cumulative assessment and cumulative assessment methodology are provided in Section 2.9 of Chapter 2 (Background and Policy) of the rEIAR.

14.5.1 Cumulative Effects (Direct Effects – Construction stage)

The cumulative effects of the Existing Development and other relevant projects within 2km of the Wind Farm Site and Grid Connection Site have been considered. Direct effects for the Existing Development are considered to be confined to within the Wind Farm Site and Grid Connection Site and relate to construction effects.

Planning applications within 2km of the Existing Development that were extant during the construction of the Existing Development were 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, larger residential developments, wind energy 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 in relation to such developments 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.

14.5.1.1 Cumulative effects to UNESCO World Heritage sites (tentative), National Monuments in State Care, Recorded Monuments, NIAH and RPS

No UNESCO World Heritage Sites, National Monuments in State Care or RPS structures are located within the Wind Farm Site and Grid Connection Site therefore no direct effects on these resources were identified when considering the Existing Development alone. Similarly, no direct effects to the NIAH structures within the Grid Connection Site have been identified. When the Existing Development is

considered with other relevant projects within 2km it does not result in direct cumulative effects to the recorded cultural heritage resource since none were identified in the first place. The aforementioned cultural heritage assets are largely located away from the Wind Farm Site and Grid Connection Site and therefore are not capable of being directly affected by the Existing Development. No cumulative direct effects to same are therefore identified.

14.5.1.2 Cumulative effects on potential sub-surface archaeology

Archaeological monitoring of ground works during the construction stage of the Existing Development was carried out. No sub-surface archaeology was detected during monitoring of the works therefore cumulative effects to this aspect of the archaeological resource are not identified. While it is possible that some unidentified subsurface archaeology could have been affected by the November 2020 Peat Slide this is considered unlikely given that there are no recorded monuments within the Existing Development and no new sites were uncovered during ground works for the project. Notwithstanding this, there were no direct effects on potential sub-surface archaeology associated with the Existing Development and therefore no potential for cumulative effects in-combination with any other project or event.

14.5.2 Cumulative Effects (Indirect Effects)

Indirect effects on setting occur at the operational stage of the development. In this regard in order to assess overall cumulative effects on archaeology and cultural heritage, the Existing Development is considered with other developments which were extant or under construction at the same time as the Existing Development. Given the nature of the Existing Development it is not deemed to be as visually prominent as elements such as turbines (not constructed). Furthermore, as outlined in Section 14.3, no cultural heritage assets are located within the Wind Farm Site, with only two NIAH sites located within the Grid Connection Site. In this regard, no potential visual effects to the cultural heritage resource as a result of the Existing Development are identified. When considered with the other extant projects cumulative effects to the setting of the recorded archaeological and cultural heritage resource are therefore not identified.

14.6 In-Cumulation Effects

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

Table 14-5: Table of in-cumulation effects (direct and indirect).

Direct / Indirect Effects	Existing Development	Prospective Development	Subject Development
Direct Effects	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.
Indirect Effects	No indirect visual effects to the recorded	No potential visual effects to UNESCO	The potential In-Cumulation effects to

	or unrecorded Cultural Heritage resource as a result of the Existing Development have been identified.	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. 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.	these aspects of the Cultural Heritage resource from the Subject Development is also considered to be Not Significant.
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14.7 Cumulative Effects – Subject Development

The potential cumulative effects between the Subject Development and the other projects described in Chapter 2 of the rEIAR, 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 cumulative 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 rEIAR and the EIAR.

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 the EIAR are implemented then cumulative direct effects to unknown sub-surface archaeology will not occur, regardless of the other 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 no significant cumulative effects are identified.

14.8 Transboundary Effects

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 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 Existing Development. The assessment was based on desktop research, previous field survey, GIS based mapping, and the results of monitoring of ground works (Appendix 14-1: Delany, 2023). Potential direct and indirect effects to the recorded and unrecorded cultural heritage resource as a result of the Existing Development were assessed. No potential direct or indirect effects were identified. Potential cumulative effects were also assessed with no cumulative effects identified.

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

14.10

EIA Classification Summary

Table 14-6: Impact Assessment Classification Summary

Cultural Heritage	Pre-Mitigation Effect	Section Reference	Residual Effect	Significant
Construction Phase				
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	Section 14.4.3.2	None	Not Significant
Recorded Monuments	Neutral	Section 14.4.3.3	None	Not Significant
Previously Unrecorded Monuments	Neutral	Section 14.4.3.5	None	Not Significant
Sub-surface Archaeology	Neutral	Section 14.4.3.4	None	Not Significant
Protected Structures & Listed Buildings (NI)	Neutral	Section 14.4.3.6	None	Not Significant
NIAH Structures and Historic Gardens	Neutral	Section 14.4.3.7	None	Not Significant
Industrial Heritage (NI)	Neutral	Section 14.4.3.8	None	Not Significant
Features of Local Cultural Heritage Merit	Neutral	Section 14.4.3.9	None	Not Significant