

SSE Tarbert Next Generation Power Station

Environmental Impact Assessment Report (EIAR)
Volume I
Chapter 08 Cultural Heritage

SSE Generation Ireland Limited

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Prepared for:

SSE Generation Ireland Limited

Prepared by:

AECOM Ireland Limited
4th Floor
Adelphi Plaza
Georges Street Upper
Dun Laoghaire
Co. Dublin A96 T927
Ireland

T: +353 1 238 3100
aecom.com

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8. Cultural Heritage

8.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) describes and assesses the likely significant effects from the Proposed Development upon the cultural heritage, archaeological and architectural environment.

This chapter of the EIAR:

- defines the study area focussing on heritage in the vicinity of the Proposed Development which could be impacted by the proposed works;
- the methodology used for developing the baseline and impact assessment;
- provides a description of the baseline environment in relation to heritage; and
- presents the findings of the impact assessment.

The application Site boundary ('red line boundary') is enclosed within the SSE Tarbert site ('SSE Tarbert') which is mostly under the management of the Applicant (refer to Figure 1.1, EIAR Volume III).

Full details on the background and Site history are provided in Chapter 4 (Existing Site and Conditions) and details of the Proposed Development are presented in Chapter 5 (Description of the Proposed Development) and the Planning Statement submitted with this planning application.

8.2 Legislation, Policy and Guidance

This chapter has been prepared and assessment undertaken in accordance with all relevant legislation, policies and guidelines. The documents utilised in the preparation of this study include:

- National Monuments Act 1930 (as amended);
- Record of Monuments and Places (RMP) established under Section 12 of the National Monuments (amendment) Act 1994;
- Planning and Development Act 2000 (as amended);
- Heritage Act 1995; Architectural Heritage (national inventory);
- Historic Monuments (miscellaneous provisions) Act 1999;
- Kerry County Development Plan (Kerry CDP) 2022-2028;
- Clare County Development Plan (Clare CDP) 2023-2029;
- Limerick County Development Plan (Limerick CDP) 2022-2028;
- Department of Arts, Heritage and the Gaeltacht (1999a) Frameworks and Principles for the Protection of the Archaeological Heritage; and
- Department of Arts, Heritage and the Gaeltacht (2004) (revised 2011). *Architectural Heritage Guidelines for Planning Authorities*.

The Historic and Archaeological Heritage and Miscellaneous Provisions Bill 2023 was published in January 2023 and reached Dáil Final on the 27 September 2023 (House of the Oireachtas, 2023). The Bill will repeal the National Monuments Acts 1930 to 2014 and replace those Acts with new provisions for heritage protection. It will modernise historic and archaeological heritage legislation, providing for a single integrated licencing system and statutory codes of practice. It will confer legal protections on new finds of archaeological sites and set out a civil enforcement system to be used as an alternative to, or to supplement criminal proceedings. It will also provide for the State to ratify some key international conventions in the area of heritage protection. In particular, it will give effect to the EIA directive in relation to the carrying out of works at, on, in, under, to or within the immediate surroundings of monuments. Sections dealing with EIAR in regard to monuments are contained in Part 2 Chapter 6 while EIAR in relation to the issuing of guidelines and matters relating to Historic Heritage can be found in Part 9. Both sections were considered in the preparation of this chapter.

8.2.1 Local Policy Framework

Although the SSE Tarbert Site is located in Kerry County Council (KCC) only, the wider 3km study area (refer to Figure 8.1, EIAR Volume III) around the Proposed Development extends into Counties Clare and Limerick. Given this, the County Development Plans associated with Kerry, Clare and Limerick are noted within this assessment.

8.2.1.1 Kerry County Development Plan 2022 – 2028

Local planning policy that applies to the Proposed Development site are contained within the Kerry County Development Plan 2022 – 2028 ('Kerry CDP'). There are a large number of strategic objectives providing a framework for development which may affect heritage assets. These are laid out in chapter 8 of the Kerry CDP and deal with both archaeological and architectural heritage. Those archaeological strategic objectives most pertinent to the Proposed Development are as follows:

- **KCDP 8-24:** (i) Secure the preservation in situ of all sites, features, protected wrecks and objects of archaeological interest within the county. In securing such preservation the Council will have regard to the advice and recommendations of the National Monuments Service, Department of Housing, Local Government and Heritage, the National Museum of Ireland, and the County Archaeologist.
- (ii) Ensure that proposed development (due to location, size, or nature) which may have implications for the archaeological heritage of the county will be subject to an Archaeological Assessment (including Underwater Archaeological Impact Assessment) which may lead to further subsequent archaeological mitigation – buffer zones/exclusion zones, monitoring, pre-development archaeological testing, archaeological excavation and/or refusal of planning permission. This includes areas close to archaeological monuments, development sites which are extensive in area (half hectare or more) or length (1km or more) or include potential impacts on underwater cultural heritage and development that requires an Environmental Impact Assessment.
- **KCDP 8-25** Ensure the protection and preservation of archaeological monuments, wrecks and features, not yet listed in the Record of Monuments & Places (RMP), Sites & Monuments

Record (SMR) or Wreck Inventory of Ireland Database and such unrecorded, through on-going review of the archaeological potential of the plan area. In securing such protection the council will have regard to the advice and recommendations of The National Monuments Service, Department of Housing, Local Government and Heritage, and the County Archaeologist.

- **KCDP 8-26** Protect and preserve and promote the underwater archaeological heritage of the county. In assessing proposals for development, the Council will take account of the Archaeological Potential of rivers, lakes, intertidal and sub-tidal environments. Where flood relief schemes are being undertaken the Council will have regard to the Archaeological Guidelines for Flood Relief Schemes (DHLGH and OPW 2021).
- **KCDP 8-27** Ensure that development (including forestry, renewable energy developments and extractive industries) within the vicinity of a recorded monument, zone of archaeological potential or archaeological landscape does not detract from the setting of the feature and is sited and designed appropriately and sympathetically with the character of the monument/feature/landscape and its setting.
- **KCDP 8-30** Protect and preserve the industrial, military, maritime, riverine, lacustrine and post-medieval archaeological heritage of the county as reflected in such sites as mills, lighthouses, harbours, Valentia cable station, gun batteries, towers, and demesnes. Proposals for refurbishment, works to or redevelopment of these sites should be subject to a full architectural and archaeological assessment including, where appropriate, Underwater Archaeological Impact Assessment.
- **KCDP 8-33** Continue to research and record the archaeological heritage of the county and to promote the timely public access to the results of archaeological research and excavation.

The architectural strategic objectives most pertinent to this project are as follows:

- **KCDP 8-38** Seek the retention and appropriate repair and upgrading of historic, buildings, structures, road bridges, railway bridges and tunnels throughout the county, subject to environmental assessment.

Record of Protected Structures

- **KCDP 8-40** Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting including designed landscape features and views, is compatible with the special character of that structure.

Architectural Conservation Areas (ACA)

- **KCDP 8-44** Ensure developments in an ACA have a positive impact on the intrinsic character of the area, respect the existing streetscape and layout, and are compatible in terms of design, materials, traffic, views, and intensity of site use.

The strategic objectives relating to Historic Landscapes most pertinent to this project are as follows:

- **KCDP 8-49** Carry out further research and analysis to identify, survey and promote the conservation of historic landscapes in Kerry.

- **KCDP 8-50** Require that proposals for development within historic designed landscapes be sensitive to and respect the built heritage elements and green space values of the site.

8.2.1.2 Clare County Development Plan 2023 – 2029

Local policy is provided in chapter 16 of the Clare County Development Plan 2023 – 2029 (Clare CDP). Clare CDP presents the objectives required to protect the architectural, archaeological, and cultural heritage of the County. In accordance with the overall vision of the Clare CDP, it is based on the following strategic aims:

- To protect and enhance the character of the built environment by means of the Record of Protected Structures and Architectural Conservation Areas.
- To enhance present and future environments by protecting the architectural heritage of the County and successfully integrating new development.
- To protect the archaeology resource in the County for both its intrinsic and tourism value.
- To promote and support cultural activities, facilities and services in County Clare: and
- To protect and enhance the vernacular-built environment across the county.

Heritage is protected through a range of Development Plan Objectives, only those applicable to the Proposed Development are outlined. Architectural heritage is protected through the following Clare CDP Objective:

- **CDP 16.1:** Development Plan Objective: Architectural Heritage

It is an objective of Clare County Council:

- a) To ensure the protection of the architectural heritage of County Clare through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the County.
- b) To ensure that the architectural heritage of the County is not damaged either through direct destruction or by unsympathetic developments nearby; and
- c) To support and promote architectural vernacular skills training and facilities in the county.

Protected Structures are protected through the following Clare CDP Objective:

- **CDP16.2:** Development Plan Objective: Protected Structures

It is an objective of Clare County Council:

- a) To protect, as set out in the Record of Protected Structures, all structures, and their settings, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest; and
- b) To review the Record of Protected Structures periodically and add structures of special interest as appropriate, including significant elements of industrial, maritime, or vernacular heritage and any twentieth century structures of merit.

Architectural Conservation Areas are protected through the following Clare CDP Objective:

- **CDP16.5:** Development Plan Objective: Architectural Conservation Areas (ACAs)

It is an objective of Clare County Council:

- a) To ensure that new developments within or adjacent to an ACA respect the established character context of an area and contribute positively to the ACA in terms of design, scale, setting and material finishes.
- b) To protect from demolition or removal and non-sympathetic alterations, existing buildings, structures, groups of structures, sites, landscapes, and features such as street furniture and paving, which are considered to be intrinsic elements of the special character of the ACA.
- c) To ensure that all new signage, lighting, advertising, and utilities to buildings within an ACA are designed, constructed and located in a manner that does not detract from and is complementary to the character of the ACA; and
- d) To ensure that external colour schemes in ACAs enhance the character and amenities of the area and reflect traditional colour schemes.

Archaeological heritage is protected through a range of Development Plan Objectives covering both terrestrial and underwater archaeology as well as the raising of public awareness regarding archaeology. The following Clare CDP Objectives are pertinent to the Proposed Development:

CDP16.8: Development Plan Objective: Sites, Features and Objects of Archaeological Interest

It is an objective of Clare County Council:

- a) To safeguard sites, features and objects of archaeological interest generally.
- b) To secure the preservation (i.e., preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally.
- c) In securing such preservation, the Council will have regard to the advice and recommendations of the Department of the Arts, Heritage, Regional, Rural and Gaeltacht Affairs).
- d) To have regard to the government publication 'Framework and Principles for the Protection of the Archaeological Heritage 1999' in relation to protecting sites, features and objects of archaeological interest; and
- e) To advocate for greater financial assistance for the maintenance and improvement of features of archaeological interests in County Clare.

CDP16.9: Development Plan Objective: Newly Discovered Archaeological Sites

It is an objective of Clare County Council:

- To protect and preserve archaeological sites discovered since the publication of the Record of Monuments and Places

CDP16.12: Development Plan Objective: Raising Archaeological Awareness

It is an objective of Clare County Council:

- To raise awareness of and improve practice in relation to archaeology in County Clare. Guidance material will be produced setting out the requirements for archaeological protection in the County.

8.2.1.3 Limerick County Development Plan 2022 – 2028

Local policy for County Limerick is provided in chapter 6 of the Limerick County Development Plan 2022 – 2028 (Limerick CDP). This outlines strategic interlinked objectives of the Limerick CDP that include the following for heritage:

- **9. Protect, conserve and enhance the built and cultural heritage of Limerick, through promoting awareness, utilising relevant heritage legislation and ensuring good quality urban design principles are applied to all new developments. The principle that well planned and integrated development enhances the sustainability, attractiveness and quality of an area should be at the centre of any proposal.**

Heritage is protected through a range of Development Plan Objectives, only those applicable to this project are outlined. Archaeological heritage is protected through the following Limerick CDP Objectives:

- **Objective EH O36 Preservation of the Archaeological Heritage**

It is an objective of the Council to seek the preservation of all known sites and features of historical and archaeological interest. This is to include all the sites listed in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act 1994. The preferred option is preservation in situ, or at a minimum preservation by record.

- **Objective EH O37 Preservation of unrecorded/newly discovered Archaeological Heritage**

It is an objective of the Council to protect and preserve the preservation in situ (or at a minimum by record) of all sites and features of historical and archaeological interest, discovered subsequent to the publication of the Record of Monuments and Places.

- **Objective EH O39 Protection of the setting of Archaeological Monuments**

It is an objective of the Council to ensure that no development shall have a negative impact on the character or setting of an archaeological monument.

- **Objective EH O40 Proper procedures during the planning process**

It is an objective of the Council to:

a) Ensure early engagement at pre-planning stage is undertaken with the Local Authority Archaeologist to promote the 'preservation in situ' of archaeological remains and settings in development.

b) Adopt a policy of archaeological monitoring of developments where the scale and nature of such developments may, in the opinion of the Planning Authority, have a negative impact on previously unknown archaeological features/artefacts.

c) Require the preparation of an Archaeological Heritage Assessment in cases where it is deemed that Archaeological Heritage would be affected by a proposed development (due to their location, size or nature). The report shall be prepared by a suitably qualified archaeologist on the archaeological implications, if any, of the proposed development either prior to a decision on a planning application or prior to commencement of development on site.

Protected Structures are protected through the following Limerick CDP Objectives. Only those applicable to the Proposed Development are noted:

- **Objective EH O50 Work to Protected Structures**

It is an objective of the Council to:

- a) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.
- b) Ensure that any development proposals to Protected Structures, their curtilage and setting, shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities published by the Department of the Arts, Heritage and the Gaeltacht.
- d) Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting, is sensitively sited and designed and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.
- e) Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.
- g) Support the re-introduction of traditional features on protected structures where there is evidence that such features (e.g., window styles, finishes etc.) previously existed.
- h) Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.
- i) Protect the curtilage of Protected Structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds, that would adversely impact on the special character of the Protected Structure.
- k) Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development.

Built Heritage assets recorded on the National Inventory of Built Heritage are protected through the following Limerick CDP Objective:

- **Objective EH O52 National Inventory of Architectural Heritage (NIAH)**

It is an objective of the Council to review and update the RPS on foot of any Ministerial recommendations including the NIAH and any future updates. The Ministerial recommendations, made under Section 53 of the Planning Act, will be taken into account when the Planning Authority is considering proposals for development that would affect the historic or architectural interest of these structures.

Architectural Conservation Areas assets are protected through the following Limerick CDP Objectives:

- **Objective EH O53 Architectural Conservation Areas**

It is an objective of the Council to:

- a) Protect the character and special interest of an area, which has been designated as an Architectural Conservation Area (ACA) as set out in Volume 3.
- b) Ensure that all development proposals within an ACA be appropriate to the character of the area having regard to the Character briefs for each area.

c) Ensure that any new development or alteration of a building within an ACA or immediately adjoining an ACA, is appropriate in terms of the proposed design, including scale, height, mass, density, building lines and materials.

d) Seek a high quality, sensitive design for any new development(s) that are complementary and/or sympathetic to their context and scale, whilst simultaneously encouraging contemporary design which is in harmony with the area. Direction can also be taken from using traditional forms that are then expressed in a contemporary manner, rather than a replica of a historic building style.

8.2.2 Guidance

The assessment of baseline conditions was carried out in accordance with the following guidance and the Historic England and Cork County Council guidance noted in section 8.3.1:

- EPA (2022). Guidelines on the Information to be Contained in Environmental Impact Assessment Reports.
- EPA (2003). Advice Notes on Current Practice in the Preparation of Environmental Impact Statements’.
- Department of Arts, Heritage, Gaeltacht and the Islands (2005a). Frameworks and Principles for the Protection of the Archaeological Heritage.
- Department of the Environment, Heritage and Local Government (2009) Government Policy on Architecture 2009-2015.
- Department of Arts, Heritage and the Gaeltacht’s (2011). Architectural Heritage Guidelines for Planning Authorities.
- NRA (2005a). Guidelines for the Assessment of Archaeological Heritage Impacts of National Road Schemes.
- NRA (2005b). Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes.

8.3 Methodology

8.3.1 Setting Assessment Methodology

This assessment has been guided by *Historic England Historic Environment Good Practice Advice in Planning: Note 3 (Second Edition) – The Setting of Heritage Assets*¹ (Historic England methodology). The Setting of Heritage Assets provides guidance on setting and development management, including assessing the implications of development proposals, and is considered current best practice as a counterpart to which has not yet been produced in the Republic of Ireland, including the guidelines noted in section 8.2.2.

¹ Historic England (2017). *Historic Environment Good Practice Advice in Planning Note 3. 2nd edition.*

A staged approach is recommended for setting assessments, the first step of which is to identify the settings of the cultural heritage assets that may be affected. The second step is to assess whether, how and to what degree these settings make a positive contribution to the importance of the heritage asset(s), i.e., “what matters and why”. This includes a description of the key attributes of the cultural heritage asset itself, followed by consideration of the physical surroundings of the asset. This includes its relationship with other heritage assets, the way the cultural heritage asset is appreciated, and the asset’s associations and patterns of use. The third step (where appropriate) is to assess the effect of a proposed development on the significance of assets, through the consideration of the key attributes of the proposed development in terms of its location and siting, form and appearance, wider effects, and permanence.

The assessment methodology has also been guided by the DEHLG *Architectural Heritage Protection, Guidelines for Planning Authorities which was published in 2004 and revised in 2011*², relevant details of which follow. It is important to note that paragraph 13.8.1 of the 2011 Guidelines state that proposed developments outside the curtilage or grounds of a Protected Structure or Architectural Conservation Area (ACA) should be given similar consideration to proposed developments within the attendant grounds. This methodology has been combined with the Historic England methodology³, in order to conduct a similar and more robust assessment of the impacts of the Proposed Development on recorded archaeological monuments, in addition to architectural heritage.

The following guidance taken from the DAHG’s *Architectural Heritage Protection, Guidelines for Planning Authorities*⁴, has been followed regarding development within the attendant grounds:

“Development Within the Attendant Grounds

13.7.1 It is essential to understand the character of a site before development proposals can be considered. Where attendant grounds of particular significance are proposed for development, a conservation plan could be prepared in advance of any planning application which would identify the significance of the site and locate areas within the designed landscape, if any, which could accept change and development and those areas which could not without damaging the architectural heritage of the place.

13.7.2 When dealing with applications for works within the attendant grounds of a protected structure, a visit to the site should be considered an essential part of the assessment. The planning authority should consider:

- a) Would the development affect the character of the protected structure?*
- b) Would the proposed works affect the relationship of the protected structure to its surroundings and attendant grounds?*
- c) Would the protected structure remain the focus of its setting? For example, a new building erected between a structure and a feature within the attendant grounds will alter the character of both;*

² DAHG (2011). *Architectural Heritage Protection, Guidelines for Planning Authorities*

³ Historic England (2017).

⁴ DAHG (2011).

d) Do the proposed works require an alteration of the profile of the landscape, for example, the creation of a golf course? How would this affect the character of the protected structure and its attendant grounds?

e) Do the proposals respect important woodland and parkland? Do they conserve significant built features and landscape features?

f) Are there important views of or from the structure that could be damaged by the proposed development? Would important vistas be obstructed by new development?

g) Would distant views of important architectural or natural landmarks be blocked or changed? Would a significant skyline be altered?

h) Even where the proposed development is at a distance from the protected structure, could it still have an impact? This could include tall or bulky buildings interrupting views of or from the protected structure and other features of the designed landscape;

i) Where the new works would not be directly visible from the protected structure, would they be visible from the approaches to the structure or from other important sites or features within the attendant grounds? If so, would this be acceptable?

j) What effect would the scale, height, massing, alignment or materials of a proposed construction have on the protected structure and its attendant grounds?

Other Development Affecting the Setting of a protected structure or an Architectural Conservation Area:

13.8.1 When dealing with applications for works outside the curtilage and attendant grounds of a protected structure or outside an ACA which have the potential to impact upon their character, similar consideration should be given as for proposed development within the attendant grounds. A visit to the site should be considered an essential part of the assessment.

13.8.2 New development both adjacent to, and at a distance from, a protected structure can affect its character and special interest and impact on it in a variety of ways. The proposed development may be sited directly about the protected structure, as with buildings in a terrace. Alternatively, it may take the form of a new structure within the attendant grounds of the protected structure. A new development could also have an impact even when it is detached from the protected structure outside the curtilage and attendant grounds but is visible in an important view of or from the protected structure.

13.8.3 The extent of the potential impact of proposals will depend on the location of the new works, the character and quality of the protected structure, its designed landscape and its setting, and the character and quality of the ACA. Large buildings, sometimes at a considerable distance, can alter views to or from the protected structure or ACA and thus affect their character. Proposals should not have an adverse effect on the special interest of the protected structure or the character of an ACA.”

In addition to the legislation and guidance detailed, the setting assessment methodology has also adhered to the guidance contained within Cork County Council (CCC.), 2006, *Guidance Notes for the*

*Appraisal of Historic Gardens, Demesnes, Estates and their Settings*⁵. This document was prepared by CCC. in response to increasing adaptation and redevelopment of planned landscapes within the county. The guidance notes advise the following stepped approach, which also has relevance to development beyond Cork and has been applied to this assessment of the Proposed Development:

- Identification and description of development, history, features and boundaries of the designed landscape using scoping, archival research and fieldwork.
- Evaluation and assessment of aspects of significance including historical landscape description, archaeological and horticultural aspects.
- Assessing development proposals through an assessment of the heritage impact.
- Recommendations for mitigation and management including future research.

8.3.2 Study Area

A 1km study area has been used for non-designated assets and a 3km study area for designated assets, extending to 5km where applicable from the boundary of the Site, if intervisibility is possible (refer to Figure 8.1, EIAR Volume III). These study areas are deemed appropriate for the baseline, based on professional judgement and proportionality. These study areas are considered sufficient to identify all potentially affected designated and non-designated assets, their setting and geographical extent, and to inform the context of and potential survival of archaeological remains within the Site and its immediate surrounding area.

The cultural heritage impact assessment considers all recorded cultural heritage assets within a study area that extends 1km from the boundary of the Site of the Proposed Development. The extent of this study area was determined by the nature of the Proposed Development, which consists of a limited surface area of disturbed ground within an operational power plant and, therefore, is unlikely to impact upon cultural heritage assets located beyond this distance. The aim of this assessment was to inform decisions about further field survey techniques and / or mitigation to be applied, if necessary.

Additionally, an assessment of setting was made for designated heritage assets (National Monuments, Protected Structures as recorded on the Kerry CDP, Clare CDP and Limerick CDP and Architectural Conservation Areas) within an outer study area around the Proposed Development. No significant effects were anticipated in regard to the settings of non-designated sites due to the physical nature of these sites and/or intervening topography. Therefore, the settings assessment focused on designated sites only. Designated heritage assets up to 3km from the Site of the Proposed Development were assessed under this methodology, extending to 5km where applicable. This was based on the intervisibility between the Proposed Development and the designated heritage assets, taking into account topography, vegetation and buildings, determined through initial desktop assessment using Google Streetview, followed by a Site visit, where necessary.

⁵ CCC (2006). *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings*.

8.3.3 Determination of Baseline Environment

A Cultural Heritage asset is defined as *a monument, building, group of buildings or site which are the works of man or the combined works of nature and man constituting the historic or built environment*⁶. A heritage asset's value is not solely expressed through any designated status but can also be exhibited through a series of values or special interests. These include architectural, historical, artistic, archaeological, cultural, scientific, social or technical interests. There is the potential for non-designated assets to display special interests equivalent to a designated asset. Therefore a "designated" status does not necessarily confer a set level of importance on an asset, rather a level of importance is assigned based on an assessment of the special interest displayed by that asset and professional judgement.

Section 2 of the 1930 National Monuments Act (as amended) defines a 'national monument' as "*a monument or the remains of 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 are considered nationally important.

National Monuments and Record of Monuments and Places (RMP) sites / Register of Historic Monuments (RHM) sites are not clearly differentiated in the National Monuments Act 1930 (as amended). However, not all RMP and RHM sites and associated constraint areas demonstrate the same level or degree of heritage special interest as can be found in National Monuments. Therefore, they can be of either national or regional importance. An assessment of the special interest of the asset and professional judgement is used to identify the appropriate level of importance.

Some archaeological and architectural heritage assets are also included on the Record of Protected Structures (RPS) of each County or City Development Plan, under Section 51(1) of the Planning and Development Act, 2000 (as amended) (the Act). These protected structures are included in the RPS due to their special architectural, archaeological, artistic, cultural, historical, scientific, social or technical interest. Protected structures are considered to be of international, national or regional importance.

Architectural Conservation Areas (ACAs) are areas which are designated in a County Development Plan, under Section 81(1) of the Act, in order to "*preserve the character of a place, area, group of structures or townscape*" that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or value; or "*contributes to the appreciation of protected structures.*" ACAs are considered to be of either national or regional importance.

The National Inventory of Architectural Heritage (NIAH) was established to assist councils in assessing whether structures should be added to their RPS. These architectural heritage assets are rated to be of either international, national, regional, local or 'record only' importance.

The NIAH also contains a Garden Survey which includes designed landscapes such as parks, gardens and demesnes. These can be divided into those with substantially intact landscapes and features; and those where the landscape has been significantly eroded by later changes with only peripheral features intact. For the purposes of this assessment, the substantially intact landscapes are judged to be of

⁶ UNESCO (1972). *Convention concerning the Protection of the World Cultural and Natural Heritage.*

international, national or regional importance while the denuded landscapes are judged to be of local importance.

Townlands are the lowest level, officially defined geographical area in Ireland and date to before the Anglo-Norman period (12th century). The boundaries of townlands are often visible in the landscape as walls, tree-lined ditches and embankments or natural features such as streams. They provide visible physical evidence of historical territory or political boundaries and are regarded as being of local importance as historic, cultural heritage features.

8.3.4 Determination of Sensitive Receptors

In order to assess the potential effects of a development upon a heritage asset, it must first be assigned a level of importance. This can be done in accordance with a four-point scale, (refer to Table 8.1). This table has been derived from the guidance noted in section 8.2.2, with reference to the above legislation and policy, and using professional judgement:

Table 8.1: Factors Determining the Value of Heritage Asset

Importance	Criteria
International / Very High	<ul style="list-style-type: none"> World Heritage Sites. Protected Structures deemed to be of very high importance using legislation, EPA guidance, National Inventory of Architectural Heritage (NIAH) rating criteria and professional judgement. Structures and Designed Landscapes recorded by the NIAH. Building and Garden Survey with an International Rating.
National / High	<ul style="list-style-type: none"> National Monuments. Recorded Monuments deemed to be of high importance using legislation, EPA guidance, NRA Significance Criteria and professional judgement. Protected Structures deemed to be of high importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. Structures recorded by the NIAH Building Survey with a National Rating or deemed to be of high importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. Designed landscapes recorded by the NIAH Garden survey with main features substantially present and deemed to be of high importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. Architectural Conservation Areas containing structures and/or designed landscapes of predominantly national importance. Non-designated archaeological remains which are rare or complex in nature, and deemed to be of high importance using legislation, EPA guidance, NRA Significance Criteria and professional judgement.
Regional / Medium	<ul style="list-style-type: none"> Recorded Monuments deemed to be of medium importance using legislation, EPA guidance, NRA Significance Criteria and professional judgement. Protected Structures deemed to be of medium importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. Structures recorded by the NIAH Building Survey with a Regional Rating or deemed to be of medium importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. Designed landscapes recorded by the NIAH garden survey with main features substantially present and deemed to be of medium importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. Architectural Conservation Areas containing structures and/or designed landscapes of predominantly regional importance. Non-designated architectural heritage assets which are deemed to be of medium importance using legislation, EPA guidance, NIAH rating criteria and professional judgement.

Importance	Criteria
	<ul style="list-style-type: none"> • Non-designated archaeological remains which are neither particularly common nor uncommon, and/or of moderate complexity, and deemed to be of medium importance using legislation, EPA guidance, NRA Significance Criteria and professional judgement.
Local / Low	<ul style="list-style-type: none"> • Structures recorded by the NIAH Building Survey with a Local or Record Only Rating or deemed to be of low importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. • Designed landscapes recorded by the NIAH garden survey which have poor historic legibility or have only peripheral features surviving, and deemed to be of low importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. • Townland Boundary Features. • Non-designated architectural heritage assets which are deemed to be of low importance using legislation, EPA guidance, NIAH rating criteria and professional judgement. • Non-designated archaeological features which are particularly common or in poor condition, and deemed to be of low importance using legislation, EPA guidance, NRA Significance Criteria and professional judgement.

8.3.5 Describing Potential Impacts

Having identified the value of the heritage asset, the magnitude of the impact from the Proposed Development is assessed. A potential impact is defined as a change resulting from the Proposed Development, which affects a heritage asset. These impacts are considered using the following broad categories; Quality, Significance, Extent and Context of Impacts, Probability of Impact and Duration⁷.

The quality of an impact can be reported on a three-point scale:

- **Positive / beneficial** – a change which improves the quality or the special interests of the asset, for example the removal of an element of the surrounding setting which detracts from the appreciation of an asset;
- **Neutral** – a change which does not affect the quality or special interests of the asset; and
- **Negative / adverse** – a change which reduces the quality or special interest of the asset, for example the removal of a below-ground archaeological deposit through construction.

The significance of an impact can be judged on a seven-point scale:

- **Imperceptible impact** – a change capable of measurements but without significant consequences;
- **Not significant** – an impact which causes noticeable changes in the character of the asset but without significant consequences;
- **Slight impact** – an impact which causes a noticeable change without affecting the special interests or qualities of the asset to any particular degree;
- **Moderate impact** – a change which alters the character or special qualities of an asset in a manner that is consistent with existing and emerging baseline trends;
- **Significant impact** – an impact which, by its character, magnitude, duration or intensity, alters the special interests or qualities of an asset;

⁷ EPA (2022). *Guidelines on Information to be contained in Environmental Impact Assessment Reports*.

- **Very significant** – an impact which, by its character, magnitude, duration or intensity significantly changes the special interests or qualities of an asset; and
- **Profound impact** – an impact which obliterates the special interest or qualities of an asset.

The extent and context of impacts can be assessed by the following two descriptions:

- **Extent** – the description of the size of the area and number of assets affected by the impact; and
- **Context** – the description of whether the extent, duration, or frequency will conform or contrast with established baseline conditions relating to an asset.

The probability of impacts can be described by the following two points:

- **Likely impacts** – these are impacts that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented; and
- **Unlikely impacts** – these are impacts that can reasonably be not expected to occur because of the planned project if all mitigation measures are properly implemented.

The duration of an impact can be defined by the following criteria:

- **Momentary impact** – impact lasting from seconds to minutes;
- **Brief impact** – impact lasting for a day or less;
- **Temporary impact** – impact lasting for one year or less;
- **Short-term impact** – impact lasting one to seven years;
- **Medium-term impact** – impact lasting seven to fifteen years; and
- **Long-term impact** – impact lasting fifteen to sixty years.

Impacts can also be identified as permanent, i.e., lasting over sixty years; and reversible, i.e., can be reversed through remediation or restoration. Another consideration is the frequency of the impact, i.e., how often will the impact occur: once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually.

These impacts have been derived from the EPA *Guidelines for the Information to be contained in an EIAR*⁸. These impacts are equally applicable to the setting of an asset.

The impact score is arrived at without reference to the value of the asset. It can be given against a four-point scale:

- Very high;
- High;
- Medium; and
- Low.

⁸ EPA (2022).

The level of impact takes into account mitigation measures, which have been embedded within the Proposed Development as part of the design development process.

Taking these criteria into consideration, the magnitude of impact can be assigned by reference to a four-point scale, refer to Table 8.2.

Table 8.2: Factors Determining the Magnitude of Impact

Magnitude Of Impact	Description
Very High	Change such that the special interests or qualities of the asset are totally altered or destroyed. Comprehensive change to setting affecting importance of asset, resulting in a serious loss in our ability to understand and appreciate the asset.
High	Change such that the special interests or qualities of the asset are affected. Noticeably different change to setting affecting importance, resulting in erosion in our ability to understand and appreciate the asset.
Medium	Change such that the special interests or qualities of the asset are slightly affected. Slight change to setting affecting significance resulting in a change in our ability to understand and appreciate the asset.
Low	Minimal change to the asset that has little effect on its special interests or qualities. Does not affect our ability to understand and appreciate the asset.

8.3.6 Significance of Effect

Once the magnitude of the impact has been identified, this can be cross-referenced with the importance of the asset to derive the overall significance of effect, or the consequence of the change resulting from a proposed development, refer to Table 8.3. The significance can be judged on a seven-point scale:

- **Imperceptible** – a change capable of measurement, but without significant consequences.
- **Not significant** – a change which causes noticeable changes in the character of the asset, but without significant consequences.
- **Slight effect** – a change which causes a noticeable change without affecting the special interests or qualities of the asset to any particular degree.
- **Moderate effect** – a change which alters the character or special qualities of an asset in a manner that is consistent with existing and emerging baseline trends.
- **Significant effect** – a change which, by its character, magnitude, duration or intensity, alters the special interests or qualities of an asset.
- **Very significant** – a change which, by its character, magnitude, duration or intensity significantly changes the special interests or qualities of an asset.
- **Profound effect** – a change which obliterates the special interest or qualities of an asset.

Table 8.3: Significance of Effect Matrix

Magnitude of Impact	Importance of Cultural Heritage Asset			
	Local	Regional	National	International
Very High	Significant	Significant	Profound	Profound

Magnitude of Impact	Importance of Cultural Heritage Asset			
	Local	Regional	National	International
High	Moderate	Significant	Significant	Profound
Medium	Slight	Moderate	Significant	Significant
Low	Imperceptible	Slight	Slight	Moderate

For the purposes of this chapter, moderate to profound effects are classed as significant. Once a significant effect has been identified, additional mitigation can be applied to offset, reduce or compensate for any significant adverse effects, or to enhance positive effects. Reassessing the significance of effect after applying additional mitigation reflects the success rating of the mitigation and allows the level of residual effect to be assessed.

8.3.7 Limitations

The assessment is based upon currently available information at the time of writing including a walkover survey of the study area (section 8.4.11). No additional fieldwork has been undertaken as part of the assessment.

8.4 Baseline Environment

8.4.1 Geology and Topography

The Site is located in Tarbert, County Kerry (Co. Kerry), approximately 1.8km north of the town of Tarbert. The Site is located within the SSE Tarbert site boundary which occupies an area of approximately 42ha.

The Site is off the N67, a National Secondary Road in Tarbert, Co. Kerry, and is a brownfield site, surrounded by electricity generating, transmission and fuel storage infrastructure. The entire island is underlain by Made Ground, with natural topsoil and subsoils in the surrounding area consisting of Till derived from sandstone and shale (AECOM, 2022). The bedrock geology underlying the Site consists of the Shannon Group of undifferentiated mudstones, siltstones, and sandstones with bedrock outcrops present along the shoreline.

8.4.2 National Monuments

There are no National Monuments either within the Site or the surrounding 1km study area or 3km settings assessment area (refer to EIAR Volume III, Figure 8.1).

8.4.3 Recorded Archaeological Assets Within the 1km Study Area

Two archaeological assets are recorded within the red line boundary of the Site (refer to EIAR Volume III Figure 8.1). The first is the Tarbert Island Battery (KE003-002) which has been demolished with the existing Tarbert heavy fuel oil (HFO) Power Station built over it. The Tarbert Island Battery was first erected in 1782 in response to naval threats during the American Revolutionary War (1775-1783) when America fought Britain for independence. Tarbert Bay was used as an anchorage by merchant shipping

and the battery was constructed to defend this shipping⁹. The battery, at this time, comprised a detachment of artillery and a company of infantry.

Peacetime saw the battery abandoned only for new fortifications to be erected between August 1794 and June 1795 in response to the outbreak of war with the new French Republic in 1793. New fortifications were erected under the instruction from Lieutenant General of the Irish Board of Ordnance, the Honourable Thomas Pakenham, with a redoubt constructed holding sixteen 24-pounders and six 6-pounders.

In 1810, the site was modified again as part of the Gother Mann Committee proposals for the fortification of the Shannon estuary. It was recognised that a hostile power landing on the Shannon Estuary could take the crossing points on the River Shannon after a two-day march¹⁰. Tarbert was one of six batteries proposed on the estuary which included Kilcredaun (CL072-027002), Doonaha (CL066-03700), Scatterly Island (CL067-024015) and Kilkerin (CL068-046). The new battery was bastion-shaped in plan with two faces overlooking the estuary and a defensible guardhouse to the rear, all set on the highest part of Tarbert Island. The Pakenham redoubt was kept in use and faced with stone while the battery of 1783 may also have been retained. The battery was surrounded by a dry moat.

In 1872 Tarbert Fort contained six 68-pound smooth bore cannons and two 5.5-inch howitzers but was abandoned in 1892¹¹. The battery was demolished during the 1960s when Tarbert HFO Power Station was constructed.

The second archaeological asset located within the boundaries of SSE Tarbert site is a burial (KE003-068) which was uncovered during construction works in May 1965. The burial was located under a flagstone 1.2m below ground level and 5.5m from the shoreline of the estuary. It had been heavily disturbed by the time the burial was noticed by the workmen who noted that the bones were uncovered from river gravel similar to that within the surrounding area. The National Museum and local coroner were informed of the discovery with both agreeing that the bones should be reburied (presumably outside the boundaries of Tarbert HFO Power Station). The exact location of the burial and reburial are, now, unknown.

One other archaeological asset is located within the 1km study area. This is a bastioned fort (KE003-001) which is located on high ground 356m to the south-west of the Proposed Development. It is shown as a small six-pointed star fort on the 1st edition OS map (1841) although the northern side has since been badly damaged by the construction of the power station while the remainder is now heavily overgrown. It comprises well-defined stone banks and an external ditch with its form very similar to a fort at Dunboy Castle (CO128-001002). The fort at Dunboy dates to the 1641-1660 period and it is surmised that the Tarbert example also dates to this period.

In 2010, an assessment and test-trenching was undertaken at an undeveloped area within the boundaries of the Tarbert HFO Power Station site within the zone of archaeological potential for the fort (KE003-001). Five test-trenches were excavated to establish the extents of the monument with a ditch feature exposed in three of the test-trenches¹². This was interpreted as the outer ditch of KE003-001

⁹ McEnery, 2006 Fortress Ireland. *The story of Irish coastal forts and the River Shannon defence line.*

¹⁰ McEnery 2006

¹¹ McEnery 2006

¹² Coyne 2010 Tarbert (Demesne), Kerry in Bennett, I (Ed) *Excavations.ie Database of Irish Excavation Reports.*

as its location and orientation was comparable to that shown in the 1st edition OS mapping (1841) as well as the line of the ditch as shown hachured on the 1997 RMP constraint map. The outer edge of the ditch was cut through large shale boulders in the natural parent material.

8.4.4 Record of Protected Structures (RPS) Within the 1km Study Area

There are two Protected Structures recorded on the Kerry CDP within the 1km study area. The closer is Tarbert Lighthouse (RPS-KY-0891) which is located on the northern tip of foreshore on Tarbert Island 90m to the north of the Proposed Development.

The lighthouse is one of the earliest built in Kerry and opened in March 1834. Samuel Lewis (1837) described as a 'lofty and handsome' lighthouse¹³. It is 22m high, commanding extensive views across the estuary and is accessed via a footbridge leading to the shore. The lighthouse is marked on the 1st edition OS map (1840) with a Light Keeper's House marked to the south-west on the northern shoreline of the island. This Light Keeper's House remains extant within the SSE Tarbert site although it is not recorded as a heritage asset and is not a Protected Structure.

The second Protected Structure is Tarbert House (RPS-KY-0884) which is located 807m to the south of the Proposed Development. This detached seven-bay three-storey over part-raised basement early-Georgian house with three-bay side elevations dates to 1720 and was built by the Leslie family who still own it. The house was renovated and possibly refenestrated around 1890 with a single-bay, single-storey projecting porch added. Exterior features comprise a detached single-bay single-storey rubble stone-built outbuilding, built c. 1840, to the southeast, a detached six-bay two-storey rubble stone-built stable block, built c. 1840, to southwest retaining original fenestration with elliptical-headed integral carriage arch to ground floor, a gateway to the south-west, built c. 1840, comprising pair of cut-stone octagonal piers with wrought-iron gates and a gateway to south-east, built c. 1840, comprising pair of cast-iron piers with decorative cast-iron gates and railings.

The house and associated structures are located within the surrounding Planned Landscape, Tarbert Demesne (NIAH 2051), which incorporates most of the peninsula onto the Shannon Estuary. Tarbert House is also recorded on the National Inventory of Architectural Heritage (NIAH) as NIAH 21300310.

8.4.5 Architectural Conservation Areas (ACAs) Within the 1km Study Area

There are no ACAs within the 1km study area around the Site (refer to EIAR Volume III, Figure 8.1).

8.4.6 National Inventory of Architectural Heritage (NIAH) Building Survey Within the 1km Study Area

There is one asset recorded on the NIAH within the 1km study area (refer to EIAR Volume III Figure 8.1). This is Tarbert House (NIAH 21300310) which is also a Protected Structure and has been discussed in section 8.5.4 under this higher designation.

8.4.7 National Inventory of Architectural Heritage Gardens Survey

There is one Planned Landscape present within the 1km study area (refer to EIAR Volume III Figure 8.1). This is Tarbert Demesne (NIAH 2051) (174m west of the Proposed Development site) which dates

¹³ Lewis 1837 *A Topographical Dictionary of Ireland*.

to the 18th century although the grounds incorporate a moated site (KE003-012) dating to between 1641 and 1659. The demesne is shown on all OS mapping with the demesne comprising the main house, walled garden and dense planting occupying the peninsula onto the Shannon Estuary and giving name to the surrounding townland. Garden features included avenues, tree-rings and boat slips onto the estuary. Many features are still extant with the demesne still discernible on mapping and aerial photography due to the presence of dense mature planting. Development at SSE Tarbert site has encroached the northern extent of the Tarbert Demesne with a row of tanks now present associated with the National Oils Reserve Agency facility positioned on the mainland.

8.4.8 Previous Archaeological Investigations

A previous archaeological investigation took place in 2010 in relation to a proposed development located within the SSE Tarbert site. This investigation specifically concentrated on the fort (KE003-001) and has been described in association with this asset.

Another archaeological investigation took place adjacent to the existing Tarbert HFO Power Station in 2009 and comprised the examination of the intertidal zone adjacent to the former location of the battery (KE003-002). The survey noted shingle lying on top of rock outcrop with nothing of an archaeological nature recorded¹⁴.

8.4.9 Historic Cartographic Evidence

The 1st edition OS map (1841) shows the location of the Site in good definition (map not reproduced). The location of the Site is identified as Tarbert Island and it is clearly separate from the mainland although access is possible via a causeway and foot bridge leading to the southern shoreline of the island.

The battery (KE003-002) was in operation at that time and is the most prominent feature occupying the higher ground within the east of the island. The battery is clearly marked as is the defensible barracks and surrounding dry moat which is crossed by a draw bridge. The Master Gunner's House is located to the immediate south-east of the battery. The battery is accessed via a lane extending from the causeway on the southern shoreline.

A large building resembling an inverted 'T' is shown to the south-east of the battery (KE003-002) close to the east shoreline. This building is bounded to the south and east by a vegetable garden. A large 'C'-shaped building, identified as a Coastguard Station, is located within the south-west corner of the island directly adjacent to where the causeway makes landfall. Several smaller structures are visible around the Coast Guard Station including a signal mast. A second signal mast is marked to the north, west of the battery. Vegetable plantations are shown on all sides of the Coast Guard Station apart from the east.

A road leads east along the southern shoreline from the causeway and provides access to a quay where a steam packet office and stores are located. Marginal ground extends south-west to north-east across the island to the immediate west of the high ground. This marginal ground appears to divide the island in two with a small area of fry ground indicated on the north-west shoreline. The Light Keeper's House

¹⁴ Coyne 2009 Tarbert, Kerry in Bennett, I (Ed) *Excavations.ie Database of Irish Excavation Reports*.

associated with Tarbert Lighthouse (RPS-KY-0891) is identified while Tarbert Lighthouse, itself, is marked on the north-east foreshore of the island. A track extends south-west from the Light Keeper's House to the western tip of the island. The northern shoreline of the mainland is a short distance to the south and the presence of the track suggests that access is possible at low tide.

The star shaped fort (KE003-001) is clearly marked on Massy's Hill on the mainland. Tarbert Demesne (NIAH 2051) is very apparent as dense planting around Tarbert House (RPS-KY-0884).

The 2nd edition OS map (1896) shows the location of the Site at the start of the 20th century (map not reproduced). The location of the Site shows some change as the battery (KE003-002) has been abandoned four years previously and it is shown as an indistinctive structure with its moat possibly infilled. The Master Gunner's House is still extant as is the 'T'-shaped building on the east coast. Two boat houses with slips are now marked adjacent to the 'T'-shaped building suggesting that it is related to the Coastguard Station. The Coastguard Station is still clearly marked in the south-west corner while the surrounding buildings have become more substantial as has the causeway to the mainland. In contrast, the footbridge previously shown no longer exists. The steam packet terminal has expanded with a complex of buildings and a substantial new quay.

The marginal area subdividing the island is now marked as covered by Spring Tides. Tarbert Lighthouse (RPS-KY-0891) is clearly marked with the light keeper's house also marked but not identified. The path to the western shoreline is still extant. The features on the mainland are still clearly marked although the star-shaped fort (KE003-001) is less well defined possibly suggesting its sides have degraded.

The 3rd edition OS map (1921) shows the location of the Site during the 1930s (map not reproduced). There is little change from the previous map edition although the battery (KE003-002) is better defined suggesting its walls and moat are still extant. The coastguard station is also still extant although the 'T'-shaped building has been reduced to a single rectangular building orientated west to east.

The steam packet office and associated buildings have been reduced in size although the quay facilities are still substantive. Tarbert Lighthouse (RPS-KY-0891) is clearly labelled and identified as having a fixed white light. The light keeper's house is shown but not identified while a pier now extends into the foreshore to its immediate north-west. The star-shaped fort (KE003-001) is barely recognisable as a fortification.

Construction of Tarbert HFO Power Station started in 1965 removing the battery (KE003-002) and its associated features and the coastguard station. The oil fired Tarbert Power Station now dominates the island being prominently marked on cartographic sources since the 1960s. The steam packet office and associated buildings no longer exist, although the quay facilities are still extant.

8.4.10 Aerial Photographic Evidence

Current aerial photographic evidence (www.google.ie) shows the existing layout of the Site (Accessed 31/05/23, not reproduced). The Site is occupied by the SSE oil fired Tarbert Power Station with its two large 151m tall emission stacks and there are no traces of the battery (KE003-002) or coastguard station which formerly occupied the location. The SSE Tarbert site also incorporates the former peripheral marginal land with this area infilled with infrastructure and hardstanding set upon it. Tarbert Lighthouse

(RPS-KY-0891) is clearly visible, and the former Light Keeper's House is also extant within the Power Station site.

The former steam packet office no longer exists with the location now occupied by a car park. The quays are still major features as is the causeway leading to the mainland. The area to the west of this has been infilled with made ground and appears to be under marginal grass. The location of the star-shaped fort (KE003-001) is overgrown and there are no clearly visible signs of this asset. In contrast, the remains of Tarbert Demesne (NIAH 2051) is very apparent as dense planting around Tarbert House (RPS-KY-0884) which is a very distinctive structure set back within its grounds. The surrounding townland is called Tarbert Demesne, although the demesne has been denuded so that only the dense planting is now apparent as a planned landscape rendering this asset as of Local importance.

8.4.11 Site Walkover (13 and 14 June 2023)

The Proposed Development will be located within the footprint of the SSE Tarbert site. The proposed OCGT and associated structures will be located within the north-western section of the SSE Tarbert site and directly adjacent to the existing Tarbert HFO Power Station, in an area currently occupied by a number of existing structures and site infrastructure, refer to EIAR Volume II Appendix 8B – Photograph 8.1. The existing buildings include workshops, toilet blocks, storage buildings (including chemical storage) and areas, a water treatment plant and tank and fuel lines.

The Proposed Development will also include flood defence measures, comprising concrete walls incorporated into the construction of the OCGT enclosure in parts, refer to EIAR Volume II Appendix 8B – Photograph 8.2. As noted on the aerial photography, these areas comprise made ground and infill set on marginal ground around the edges of Tarbert Island and the marine channel separating the island from the mainland. The infill / made ground nature of these areas is clearly visible in photograph 8.2 Appendix 8B (EIAR Volume II) as is disturbance from the existing Tarbert HFO Power Station.

The existing Tarbert HFO Power Station is a prominent structure made more visible by the 151m adjacent twin emissions stacks, refer to EIAR Volume II Appendix 8B – Photograph 8.3. The Proposed Development will be located immediately adjacent to this structure and will be largely screened by it in views from the south, east and north-east while it will blend in against the structure in views from the west and north-west.

The recorded heritage assets on Tarbert Island comprise the battery (KE003-002) and burial (KE003-068) which were both removed by the construction of the Tarbert HFO Power Station. One unrecorded heritage asset is noted within the boundaries of the Proposed Development. This is the light keeper's house which is marked on historic OS mapping and associated with Tarbert light house (RPS-KY-0891), refer to EIAR Volume II Appendix 8A. The light keeper's house is still extant and appears fully intact comprising a single storey building with a flat roof and red brick chimney stacks. The house is set within a sub-rectangular area defined by a stone wall and iron railings. This property and the nearby slipway/hard standing are owned by the Commissioners for Irish Lights and can be regarded as being of Regional importance due to its connection to the light house. It will not be impacted by the Proposed Development (section 8.6.1).

8.5 Impact Assessment Methodology

Designated heritage assets (National Monuments and Protected Structures) within 3km of the Site were assessed. Designated heritage assets with potential direct lines of sight outside this 3km study area were also examined up to a distance of 5km. Non-designated heritage assets including recorded monuments, structures and designed landscapes recorded by the NIAH within 1km of the Site were also assessed.

Sixteen Protected Structures, two ACA, two recorded monuments and two assets recorded on the NIAH were assessed using Google Streetview, aerial / satellite imagery and mapping (accessed 31/05.23). Sites which were evidently screened by intervening modern development or dense vegetation during this review were scoped out of further assessment, as their settings were not considered to include the Site. Other sites, which by their nature would not be impacted upon by development some distance away, such as archaeological sites discovered through archaeological excavation or screened by intervening vegetation, were also scoped out.

Following the review, a total of 17 cultural heritage assets (refer to Appendix 8A, EIAR Volume II), comprising one Planned Landscape, two ACA, one recorded monument and 13 Protected Structures were considered to be potentially sensitive to change from the Proposed Development (Figure 8.1, EIAR Volume III). The locations of these assets were viewed as closely as possible from publicly accessible locations and their settings and the contribution of setting to their importance were assessed. As described, the Proposed Development was found to be screened from the majority of the designated assets by topography, or multiple areas of dense vegetation. Notwithstanding this screening, it was concluded that the Site does not contribute to the importance of these assets.

The closest extant heritage asset to the Site is Tarbert Lighthouse (RPS-KY-0891). As noted on the aerial photography, this asset is very evident as it is set out on the northern foreshore of the island EIAR Volume II Appendix 8B – Photograph 8.5. This regionally important asset is only visible from the Shannon Estuary with the best views from the Killimer Ferry. The existing Tarbert HFO Power Station forms the backdrop to this asset and the Proposed Development will be clearly visible.

The next closest heritage asset to the Site is the Planned Landscape, Tarbert Demesne (NIAH 2051) which, at its closest point, is 174m, to the southwest of the Site boundary, refer to EIAR Volume II Appendix 8B– Photograph 8.6. The dense boundary planting screens all views into the demesne which is considered to be of local importance. This includes views to the designated Protected Structure, Tarbert House (RPS-KY-0884), which is set back within the demesne 807m to the south of the Site (EIAR Volume II Appendix 8B – Photograph 8.7).

The bastioned fort (KE003-001), is located 356m to the south of the redline boundary, refer to EIAR Volume II Appendix 8B – Photograph 8.8. This asset is non-designated and is considered to be of local importance. This asset is located on high ground overlooking the power station, although its location is heavily overgrown obstructing views between the asset and the Site.

The town of Tarbert is south of the Site and saw prosperity during the 19th and early 20th centuries due to its location on the Shannon and proximity to the coastal battery. It was the main port within the area for the export of grain and pigs and the import of trade goods. The presence of the steamship company

also meant a heavy passenger traffic on the waterfront. This prosperity translated into the commercial and domestic buildings that are still evident today.

The remains of the former creamery (RPS-KY-0883), now used as the boundary wall for a modern housing development is located on the north-east edge of Tarbert 1.54km from the Site, EIAR Volume II Appendix 8B - Photograph 8.9. Views between this asset, which is deemed to be of regional importance, and the Site are completely screened by intervening housing and the dense vegetation of Tarbert Demesne (NIAH 2051). There are no views to the Site.

The former Bridewell (RPS-KY-0882) is a very distinctive building of regional importance located to the north-west of the remains of the former creamery (RPS-KY-0883) and 1.56km from the Site, EIAR Volume II Appendix 8B - Photograph 8.10. Views between this asset and the Site are completely screened by intervening housing while its main aspect faces south towards the town. There are no views to the Site.

The former industrial building (RPS-KY-0878) now remains as a boundary wall and arched gate to a yard 1.66km to the southwest of the Site, EIAR Volume II Appendix 8B - Photograph 8.11. This regionally important asset faces west on a corner where any views towards the Site are screened by intervening buildings including the former Bridewell (RPS-KY-0882). There are no views to the Site.

The Protected Structure, Coolahans (RPS-KY-0879) and the buildings of Tarbert ACA are located within the centre of the town 1.6km south-southwest of the Site EIAR Volume II Appendix 8B - Photograph 8.12 and 8.13. These regionally important buildings face out onto the streets where they are located and any views towards the Site are blocked by the existing streetscape. There are no views to the Site.

Similarly, the Protected Structure, Saint Mary's Catholic Church (RPS-KY-0886) and its adjacent Presbytery (RPS-KY-0885) are located on the N69 in south Tarbert 1.95km to the south of the Site EIAR Volume II Appendix 8B - Photograph 8.14 and 8.15. These regionally important church buildings date to the 19th century with the church forming an impressive building on approaching the town from the south. There are no views to the Site with views to the north blocked by intervening buildings.

The last Protected Structure within Tarbert is Saint Brendan's Church (Kilnaughtin) (RPS-KY-0887) which is located on Steeple Road to the east of the town and 1.85km to the south of the Site, EIAR Volume II Appendix 8B - Photograph 8.16. The existing main building and emission stacks of Tarbert HFO Power Station is visible from this location and the new structures of the OCGT will also be partially visible.

The ACA of Demesne of Glin Castle and associated features is located on the Coast Road in Co. Limerick 4.43km to the south-east of the Site. The Demesne covers the Planned Landscape associated with Glin Castle which dates to the late 18th century with associated features dating to the 19th century. Glin Castle faces north towards the Shannon Estuary and views towards the Site are blocked by mature tree growth associated with the Demesne. The existing Tarbert HFO Power Station is visible from the Coast Road at the location of the ACA of Demesne of Glin Castle and associated features, EIAR Volume II Appendix 8B - Photograph 8.17. The proposed OCGT will also be partially visible from this location although the new structures will be partially screened by the existing industrial buildings while the Site does not form part of critical views towards the ACA.

The remaining Protected Structures are located within Co. Clare with the closest being Bessborough House (RPS 483) which is located 2.83km to the north-northwest of the Site. Bessborough House is located within its own grounds to the immediate west of Killimer. It dates to the 18th century and comprises a large three storey building which is considered regionally important, refer to EIAR Volume II Appendix 8B - Photograph 8.18. The house faces east and is screened to the north, west and east by dense, mature tree growth. The house is clearly visible from the Shannon Estuary to the south with the best views from the Killimer Ferry. The Proposed Development will be visible from Bessborough House and will not be screened by the existing Tarbert HFO Power Station structures. However, the new structures will blend into the overall existing industrial landscape of the power station site which does not form part of critical views to Bessborough House. Additionally, the existing industrial landscape of the Tarbert HFO Power Station is set against higher ground to the south with only its 151m emissions stacks prominent on the skyline.

Oaklands (RPS 036) is located at Knock in Co. Clare 4.5km to the north-east of the Site, refer to EIAR Volume II Appendix 8B - Photograph 8.19. This regionally important house dates to 1800 and is set on a hill overlooking the Shannon Estuary. The house is surrounded by mature trees which screen views although the existing Tarbert HFO Power Station is visible. The Proposed Development will be visible, but it will blend into the overall existing industrial landscape of the power station site.

Knock Pier (RPS. 589) is located on the northern shore of the Shannon Estuary 4.6km to the north-east of the Site, refer to EIAR Volume II Appendix 8B - Photograph 8.20. This regionally important pier extends south-east into the estuary. The Site does not form part of the main view from the pier although it is visible to the south-west. The Site will be visible, but it will blend into the overall existing industrial landscape of the power station site.

The final Protected Structure is Kilkerin Fort (RPS 345) which is located at Lackyle North on a peninsula 2km to the north-east of the Site, refer to EIAR Volume II Appendix 8B - Photograph 8.21. This battery dates to the early 19th century and was intended, with the former Tarbert Island Battery (KE003-002), to provide a crossfire against any hostile shipping attempting to access the Shannon River. While the battery faces west, the power station is clearly visible, and the two batteries would have been located to be intervisible in order to communicate and co-ordinate any offensive actions. While the Proposed Development will be visible from Kilkerin Fort, it will be partially screened by existing buildings, and it will also blend into the overall existing industrial landscape of the Site.

8.6 Potential Impacts

8.6.1 Construction Phase

Construction of the Proposed Development has the likelihood to impact heritage assets in the following ways:

- Partial or total removal of heritage assets during Site clearance and construction of the Proposed Development and associated features and infrastructure within the Site. This includes the erection of a 55m tall emissions stack which will be constructed on the northern side of the proposed OCGT;

- Impact of any soil regrading on the setting of heritage assets, and damage caused to archaeological deposits caused by concrete walls such as the proposed flood defences; and
- Change to the setting of heritage assets, including visual and noise intrusion, and changes in traffic levels (construction phase only).

The Proposed Development is located on land within the existing SSE Tarbert Power Station site. SSE Tarbert is set on Tarbert Island now occupying the majority of this land mass apart from the eastern extent which contains the pier and slipway serving the ferry between Tarbert and Killimer in County Clare.

Two archaeological sites are recorded within the SSE Tarbert site. These are the battery (KE003-002) and burial (KE003-068) which were both removed by the construction of the Tarbert HFO Power Station during the 1960s. There will be no impact to the battery (KE003-002) and burial (KE003-068).

One unrecorded heritage asset is noted within the boundaries of the Site. This is the Light Keeper's House which was associated with Tarbert Lighthouse (RPS-KY-0891) with both shown on the 1st edition OS map (1841). Both assets appear complete and well maintained. Tarbert Lighthouse (RPS-KY-0891) has been designated as a Protected Structure and is considered regionally important. While the Light Keeper's House is not designated or recorded as a heritage asset, it is an original feature sharing group value and connection with a designated asset. This, and its level of preservation, suggest that it should be considered of medium importance and regional interest.

The Light Keeper's House will not be physically impacted although it is within the Site boundary. The presence of the Proposed Development will create a visual impact to the setting of the Light Keeper's House while the setting of this asset could be temporarily impacted by noise, dust and vibration during the construction works. The setting of the Light Keeper's House is currently that of an industrial complex and subject to associated noise, dust, vibration, and visual intrusion associated with the existing Tarbert HFO Power Station. Additionally, the existing Tarbert HFO Power Station building is larger than the Proposed Development. The change to setting would be such that the special interests or qualities of the Lighthouse Keeper's House are only slightly affected without a noticeable change, leading to a magnitude of impact of Low, leading to a significance of effect of Slight. The quality of the Slight significance of effect is judged as Neutral while its duration is Long-Term.

There are no extant recorded archaeological remains within the footprint of the Proposed Development with the battery (KE003-002) and burial (KE003-068) removed by the construction of the Tarbert HFO Power Station. Tarbert Island would have represented a favourable location for settlement and other activities which is evidenced by the previous presence of the burial (KE003-068). The construction of the battery (KE003-002), lighthouse associated structures and coastguard station will have impacted upon such remains with further impact caused by the construction of the Tarbert HFO Power Station during the 1960s. The nature of this impact would have been Long-Term and Permanent as a result of historic development on the Site.

Given these conditions, no previously unrecorded heritage assets, of likely local importance, will be impacted by groundworks associated with the Proposed Development including the flood defence works and temporary laydown area. The magnitude of impact is assessed as no impact.

The closest recorded heritage asset to the Proposed Development is Tarbert Lighthouse (RPS-KY-0891) which is located 90m to the north. There is the likelihood of negative impact caused by change to the setting of this asset by noise, dust, vibration, and visual intrusion from the construction related activity which could diminish its importance. As with the setting of the associated Light Keeper's House, Tarbert Lighthouse (RPS-KY-0891) is now adjacent to an industrial complex and subject to associated noise, dust, vibration, and visual intrusion associated with the existing Tarbert HFO Power Station. Additionally, the existing Tarbert HFO Power Station building is larger than the Proposed Development. The change to setting would be such that the special interests or qualities of Tarbert Lighthouse (RPS-KY-0891) are only slightly affected without a noticeable change, leading to a magnitude of impact of Low, leading to a significance of effect of Slight. The quality of the Slight significance of effect is judged as Neutral while its duration is Long-Term.

The bastioned battery (KE003-001) is located on the high ground of Massy's Hill overlooking the Shannon Estuary and Tarbert Island. The Proposed Development will be visible from this location but will be set against the larger existing Tarbert HFO Power Station to its east making it less prominent. The change to setting would be such that the special interests or qualities of the bastioned battery (KE003-001) are only slightly affected without a noticeable change, leading to a magnitude of impact of Low, resulting in a significance of effect of Imperceptible. The quality of the Imperceptible significance of effect is judged as Neutral while its duration is Long-Term.

The locally important Planned Landscape of Tarbert Demesne (NIAH 2051) is located to the south of the Proposed Development which will be partially screened by the larger existing Tarbert HFO Power Station as well as other infrastructure including the substation. The change to setting would be such that the special interests or qualities of the Tarbert Demesne (NIAH 2051) are only slightly affected without a noticeable change, leading to a magnitude of impact of **Low**, resulting in a significance of effect of **Imperceptible**. The quality of the Imperceptible significance of effect is judged as **Neutral** while its duration is **Long-Term**.

Tarbert Demesne (NIAH 2051) is a prominent Planned Landscape containing dense mature planting especially along its boundaries. This mature planting effectively blocks views between the Proposed Development and the heritage assets to the south. In particular, the Protected Structured Tarbert House (RPS-KY-0884), the former creamery (RPS-KY-0883), the former Bridewell (RPS-KY-0882) and the former industrial building (RPS-KY-0878) are completely screened from the Proposed Development by this vegetation and there are no views.

The Proposed Development will create additional noise, dust, vibration, and visual intrusion from the construction related activity including traffic using the adjacent road which is the only access to the SSE Tarbert Power Station and the Proposed Development. The presence of Tarbert Demesne (NIAH 2051) will screen the additional noise, dust, and vibration from construction activities on Site from these heritage assets. Additionally, this road serves the Tarbert-Killimer ferry terminal and is subject to large volumes of traffic, including coaches, using the ferry. The settings of these heritage assets are already subject to impact from this traffic.

The additional traffic will be temporary and only associated with the construction phase. It will not affect the ability to understand or appreciate Tarbert House (RPS-KY-0884), the former creamery (RPS-KY-

0883), the former Bridewell (RPS-KY-0882) and the former industrial building (RPS-KY-0878). The change to setting will be such that the special interests or qualities of these assets will not be affected and there will be no impact.

Similarly, views between the designated heritage assets within Tarbert and the Proposed Development are also screened by the dense vegetation of Tarbert Demesne (NIAH 2051) and also intervening buildings. There are no views between Coolahans (RPS-KY-0879), the buildings of Tarbert ACA, Saint Mary's Catholic Church (RPS-KY-0886) and its adjacent Presbytery (RPS-KY-0885) and the Proposed Development while the intervening distance will screen the additional noise, dust, and vibration from construction activities on Site.

The designated heritage assets are located within the centre of Tarbert on the N69 and it is highly likely that construction related traffic will pass them during the construction phase creating additional noise, dust, and vibration. The N69 is a busy road, and the settings of these heritage assets are already subject to impact from traffic using the road. It will not affect our ability to understand or appreciate Coolahans (RPS-KY-0879), the buildings of Tarbert ACA, Saint Mary's Catholic Church (RPS-KY-0886) and its adjacent Presbytery (RPS-KY-0885). The change to setting will be such that the special interests or qualities of these assets will not be affected and there will be no impact.

Saint Brendan's Church (Kilnaughtin) (RPS-KY-0887) is located on Steeple Road to the east of the town and 1.85km to the south of the Site. It will not be impacted by construction related noise, dust and vibration or additional construction traffic. The Proposed Development will be partially visible from the heritage asset although views will be largely screened by intervening features such as Tarbert Demesne (NIAH 2051) and the existing Tarbert HFO Power Station.

The Proposed Development does not feature in critical views to or from Saint Brendan's Church (Kilnaughtin) (RPS-KY-0887) while its current settings already incorporate a prominent industrial feature in the form of the existing Tarbert HFO Power Station. The presence of the Proposed Development will not affect our ability to comprehend or appreciate Saint Brendan's Church (Kilnaughtin) (RPS-KY-0887). The change to setting will be such that the special interests or qualities of these assets will not be affected and there will be no impact.

The ACA of Demesne of Glin Castle and associated features is located on the Coast Road in Co. Limerick 4.43km to the south-east of the Site. There are no views between the associated features, such as Glin Castle, and the Proposed Development with the main views associated with the ACA of Demesne of Glin Castle looking north towards the Shannon Estuary. The ACA of Demesne of Glin Castle does include the N67 Coast Road and adjacent shoreline. The SSE Tarbert Power Station is clearly visible when travelling west through the ACA with the main building and 151m high emissions stacks quite prominent on the skyline. The Proposed Development will merge with these structures when constructed and will not be apparent.

The presence of the Proposed Development will not affect our ability to comprehend or appreciate the ACA of Demesne of Glin Castle. The N67 Coast Road passes through the ACA and will be used by construction traffic passing to and from the Proposed Development during the construction phase. While this traffic could introduce additional noise, dust, vibration, and visual intrusion, the N69 is a main road heading west from Limerick and is already subject to large volumes of traffic including lorries (refer to

Chapter 14, EIAR Volume I for more details). The change to setting will be such that the special interests or qualities of the ACA of Demesne of Glin Castle and its associated assets will not be affected and there will be no impact.

Bessborough House (RPS 483) is located within its own grounds to the immediate west of Killimer. The house is clearly visible from the Shannon Estuary to the south with the best views from the Tarbert/Killimer Ferry. The location of the Proposed Development does not feature in critical views of the heritage asset although the Proposed Development will be visible from Bessborough House (RPS 483). The new structures will initially blend into the overall existing industrial landscape of the Tarbert HFO Power Station which, with the exception of the 151m emissions stacks, blend against higher ground to the south. The shorter 55m emissions stack will be less prominent with the Proposed Development much less apparent on the skyline. The change to setting will be such that the special interests or qualities of Bessborough House (RPS 483) will not be affected and there will be no impact.

Oaklands (RPS 036) is located at Knock in Co. Clare 4.5km to the north-east of the Site. This asset is set on a hill overlooking the Shannon Estuary and SSE Tarbert Power Station is visible. The Proposed Development will be visible, but, initially, it will blend into the overall existing industrial landscape of the power station. The change to setting will be such that the special interests or qualities of Oaklands (RPS 036) will not be affected and there will be no impact.

Similarly, Knock Pier (RPS 589) is located on the northern shore of the Shannon Estuary 4.6km to the north-east of the Site. The Site does not form part of the main view from the pier although it is visible to the south-west. The Proposed Development will be visible, but it will blend into the overall existing industrial landscape of the power station. The change to setting will be such that the special interests or qualities of Knock Pier (RPS 589) will not be affected and there will be no impact.

Kilkerin Fort (RPS 345) is located at Lackyle North on a peninsula 2km to the north-east of the Site. This battery was intended with the former Tarbert Island Battery (KE003-002) to provide a crossfire against any hostile shipping attempting to access the Shannon River. It was deliberately situated to be intervisible with the former Tarbert Island Battery (KE003-002) which is, now, SSE Tarbert Power Station. The existing Tarbert HFO Power Station is clearly visible and a prominent feature on the skyline. While the proposed OCGT will be visible from Kilkerin Fort (RPS 345), it will be partially screened by existing buildings, and it will also blend into the overall existing industrial landscape of the SSE Tarbert site.

The change to setting will be such that the special interests or qualities of Kilkerin Fort (RPS 345) will be slightly affected without a noticeable change, leading to a magnitude of impact of **Low**, leading to a significance of effect of **Slight**. The quality of the Slight significance of effect is judged as **Neutral** while its duration is **Long-Term**.

8.6.2 Operational Phase

Significant effects for the operation of the Proposed Development derive from changes to the setting of heritage assets. These largely mirror the effects assessed for the permanent presence of the Proposed Development as detailed in the assessment of the construction phase. There would be no change to the effects assessed for the designated assets identified during the construction phase within the wider

study area due to the permanent presence of the Proposed Development during the operational phase or its operation.

8.6.3 Do Nothing Scenario

The 'do nothing' scenario would not result in any significant changes to the baseline cultural heritage resource. The magnitude of impact would be no change, leading to a significance of effect of Imperceptible.

If the Proposed Development were not to proceed, environmental monitoring and site management would continue, as required under the conditions of the existing Tarbert HFO Power Station permit.

8.7 Mitigation Measures

8.7.1 Construction Phase

The assessment has determined that the Proposed Development is located within an industrial site and industrial setting which has been previously disturbed by the construction works which commenced in the 1960s. Any archaeological remains, including the battery (KE003-002) and burial (KE003-068), which were, or may have been present, will have been destroyed / removed during these historic works associated with the construction of Tarbert HFO Power Station.

It is, therefore, determined that the Proposed Development will not physically impact upon previously unknown archaeological remains. Given this, no archaeological mitigation is required during the construction phase.

The Proposed Development will have not have a significant effect upon the settings of designated heritage assets during construction. Consideration of visual intrusion and noise impacts are addressed in Chapter 10 (Landscape and Visual), Chapter 11 (Noise and Vibration) and Chapter 14 (Traffic), while embedded mitigation measures are included within the Proposed Development design.

8.7.1.1 Embedded Mitigation to be Adopted During Construction Phase

During the construction phase procedures will be adopted, as described in the Construction Environmental Management Plan (CEMP in EIAR Volume II Appendix 5A) and in Chapter 5 (Description of the Proposed Development), to reduce the impact of noise, dust, and vibration during construction. Toolbox talks will be undertaken when necessary to inform construction supervision staff and site operatives of the requirements.

8.7.2 Operational Phase

Appropriate measures will have been implemented at construction phase to avoid or reduce adverse visual impacts. No further mitigation will be required at the operational phase (including maintenance periods).

8.7.3 Decommissioning Phase

Full details of the decommissioning works will be presented in a Decommissioning Plan (including a Decommissioning Environmental Management Plan) to be produced and agreed with the EPA as part

of the Industrial Emissions Licence (IEL) and site surrender process for the facility at the end of the design life.

Temporary effects arising from the process of decommissioning of the Proposed Development are considered to be of a similar nature and duration to those temporary effects arising from the construction process and therefore have not been considered separately in this chapter.

8.8 Residual Impacts

This sub-section describes the resultant residual significance of effects on cultural heritage assets, following mitigation. This assessment has identified that, after mitigation, there would be impacts upon the settings of a number of heritage assets, resulting in minor effects upon the setting of five heritage assets, two of which are considered of low interest and three of which are assets of medium interest. Two of the assets of medium interest are designated -Tarbert Lighthouse (RPS-KY-0891) and Kilkerin Fort (RPS 345) while one is unrecorded but also considered of regional significance – Light Keeper's House. These three assets are considered of regional significance. interest. None of these effects are significant.

8.8.1 Assets of Medium Interest

There are three assets considered to be of medium value, comprising two Protected Structures -Tarbert Lighthouse (RPS-KY-0891) and Kilkerin Fort (RPS 345) and one unrecorded asset – Light Keeper's House. No specific mitigation for setting has been proposed in this chapter, as it is noted that appropriate mitigation for the construction phase is addressed in Chapter 10 (Landscape and Visual) and Chapter 14 (Traffic). The residual effect would remain Long-Term and Slight, leading to a Neutral effect, which is Not Significant.

8.8.2 Assets of Low Interest

The remaining two assets are non-designated and considered of low interest. They comprise one archaeological asset, bastioned battery (KE003-001), and one Historic Garden, Tarbert Demesne (NIAH 2051), recorded on the NIAH. No specific mitigation for setting has been proposed in this chapter, as it is noted that appropriate mitigation for the construction phase is addressed in Chapter 10 (Landscape and Visual) and Chapter 14 (Traffic). The residual effect would remain Long-Term, Imperceptible and Neutral.

8.9 Cumulative Impacts

There is the potential for cumulative effects to occur in combination with other sources in the local area. A desktop planning history search using the Kerry County Council (KCC), Limerick County Council (Limerick Co. Co.) and Clare County Council (Clare Co. Co.) Online Planning Systems noted ten planning applications which could combine with the Proposed Development to create a cumulative impact upon heritage assets.

Of these ten planning applications, three are within the SSE Tarbert site, itself. The first of these concerns works to the Tarbert substation compound and 220Kv underground cabling under planning application 23350. This application is located within the Site occupying 6.9ha and is located directly

adjacent to the Proposed Development. Planning determination has not been issued and further information requested by An Bord Pleanála regarding the application has been submitted by the applicant.

There is the potential that construction of the application 23350 could coincide with the construction of the Proposed Development creating cumulative impact from construction noise, dust, and vibration upon the settings of heritage assets as well settings impact from combined traffic activities. No specific mitigation for setting has been proposed in this chapter, as it is noted that this impact is temporary and limited to the construction phase. The significance of the cumulative effect is judged to be Low.

The second application within the SSE Tarbert Power Station is the Temporary Emergency Generation (TEG) project (ABP-315838-22) which will be located c.170m to the south-west of the Proposed Development. It will comprise three open cycle gas turbine units including 30m flue gas stacks (and balance of plant); liquid fuel storage and offloading facility; connection equipment; and connection to the existing electrical substation. The TEG will be nearing completion and being commissioned by the time the construction starts on the Proposed Development (subject to the grant of planning consent) so there will be limited cumulative impact from construction noise, dust, and vibration upon the settings of heritage assets. Similarly, there will be no impact from combined construction traffic activities.

The TEG will remain in place with an approximate two or three-year operational overlap with the Proposed Development depending on when planning permission is granted and construction commences. Its three 30m flue gas stacks could combine with the 55m high emissions stack of the Proposed Development to create an impact upon the settings of the heritage assets particularly the Tarbert Lighthouse (RPS-KY-0891), Light Keeper's House and bastioned fort (KE003-001). These stacks will be largely screened by the existing infrastructure including the Tarbert HFO Power Station building. The TEG is a temporary project which will be removed after 2028 when any cumulative impact will cease. The significance of the cumulative effect is judged to be Low.

The third application within the SSE Tarbert Power Station is a battery storage facility (18392) with a total site area of up to 2.2278ha, to include 50 no. self-contained battery container units with associated HVAC cooling units, 13 converter and 13 step up transformer container units, associated compound cabling and ducting, a grid transformer, a single storey substation / control building with welfare facilities, a cable route grid connection to the existing ESB substation building, maintenance lighting, security fencing, a CCTV monitoring system, and all associated ancillary infrastructure on lands within the Tarbert generating facility.

A ten-year planning permission is being sought to construct this development so there is the potential that construction of the battery storage facility could coincide with the construction of the Proposed Development creating cumulative impact from construction noise, dust, and vibration upon the settings of heritage assets as well settings impact from combined traffic activities. No specific mitigation for setting has been proposed in this chapter, as it is noted that this impact is temporary and would be limited to the construction phase. The significance of the cumulative effect is judged to be Low.

Four of the applications (18878, 19115, 20850 and 21549) relate to various elements of an electricity power generating peaking plant and battery energy storage system facility on a site 1.8 km to the south-west of the Proposed Development. Elements of this development have already been constructed which

is located on a site located on higher ground. Given the distance between these two developments, which includes intervening mature tree plantation associated with Tarbert Demesne (NIAH 2051), it is unlikely that construction noise would combine to create a cumulative impact upon the settings of the heritage assets within the study area.

The remaining three applications all relate to the Moneypoint Power Station located on the opposite side of the Shannon Estuary within County Clare approximately 4km to the northwest of the Proposed Development. The earliest planned of these is a 7.5MW capacity battery storage facility (application 18520) within a secured compound, on a 0.4ha site. The distance between this application and the Proposed Development means it is unlikely there would be any cumulative impact as it is unlikely that construction noise would combine to create a cumulative impact upon the settings of the heritage assets within the study area.

The second application within Moneypoint Power Station is a 300 to 400 MVA (electrical rating) synchronous condenser (application 19746) which will be situated in a 1.8 ha site. The distance between this application and the Proposed Development means it is unlikely there would be any cumulative impact as it is unlikely that construction noise would combine to create a cumulative impact upon the settings of the heritage assets within the study area.

The final application (2332) within Moneypoint Power Station relates to land-based Site Investigations (SI) works comprising of boreholes and trial pits across the site. These will create very limited ground disturbance and noise with the SI works completed before the Proposed Development commences. There will be no cumulative impact.

8.10 Summary

The Proposed Development comprises the construction of an OCGT unit within the SSE Tarbert site. This is an industrial location set on Tarbert Island which has undergone previous disturbance being previously the location of a 19th century artillery battery (KE003-002). The assessment has determined that the Proposed Development is located within this industrial setting, any archaeological remains which may have been present will have been disturbed and / or destroyed during historic works associated with the construction of the existing Tarbert HFO Power Station. No archaeological mitigation is required.

One previously unrecorded heritage asset is noted within the boundaries of the Proposed Development. This is a Light Keeper's House which dates to the 19th century and is associated with Tarbert Lighthouse (RPS-KY-0891). While not officially recorded as a heritage asset, this building has been judged through professional opinion to be of medium importance and regional interest. This asset will not be physically impacted, although its setting will be impacted by the presence of the Proposed Development.

No specific mitigation for setting has been proposed in this chapter, as it is noted that appropriate mitigation for the construction phase is addressed in Chapter 10 (Landscape and Visual) and Chapter 14 (Traffic). The residual effect would remain Long-Term and Slight and Not Significant.

The height of the proposed emissions stack for the Proposed Development will be 55m in height, which could create a visual effect to the settings of heritage assets within the surrounding area. This

assessment has identified that, after mitigation, there would be minor effects upon the setting of four further heritage assets, of which two are designated. These designated assets are considered of medium importance. None of these effects are significant.

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