



Orsted Onshore Ireland Midco Limited

11: MEMORANDUM RESPONSE TO SUBMISSIONS RECEIVED

Archaeology, Architectural and Cultural Heritage

Proposed Oatfield Wind Farm Project, Co. Clare: ABP
Case No. ABP-318782-24

June 2024



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1 ARCHAEOLOGY, ARCHITECTURAL AND CULTURAL HERITAGE

1.1 Introduction

The following memorandum has been prepared to address submissions received during the observations and submissions period associated with the Oatfield Wind Farm Planning Application. The planning application for the aforementioned Proposed Development was submitted to An Bord Pleanála on 22nd December 2023 (ABP Case Number: ABP-318782-24). The period for submissions and observations was 22nd December 2023 to 19th February 2024.

This is memorandum number 11 in the Oatfield Wind Farm submission response documentation, which addresses common themes identified within the discipline of Archaeology, Architectural and Cultural Heritage (corresponding to **EIAR Chapter 15 Archaeology, Architectural and Cultural Heritage**), submitted as part of the planning application made to An Bord Pleanála).

Responses to submissions received from regulatory & prescribed bodies are presented in Section 2 and responses to common themes in submissions received from the general public are presented in Section 3.

1.2 Statement of authority

This memorandum was prepared by Dr Diarmuid O'Seaneachain BA PhD MCIfA Associate Director and Greg Bowen BA (Hons.) MA ACIfA, Archaeology Consultant with RSK ADAS Limited. Dr Diarmuid O'Seaneachain leads the ADAS Archaeology and Historic Buildings Team. He is a Member of the Chartered Institute of Archaeologists with over 17 years' experience. ADAS is a Registered Organisation with the Chartered Institute of Archaeologists and is a member of the Institute for Historic Building Conservation (IHBC). Dr O'Seaneachain has previously worked on several large-scale infrastructure schemes in Ireland including the N8 Fermoy/Mitchelstown road scheme, the N18 Gort/Crusheen road scheme and the A4/A5 Dungannon/Ballygawley road project in Northern Ireland. In 2008/2009 Diarmuid worked as a heritage consultant on the route determination and cultural heritage assessment of the EIA for the A5 Derry to/Ballygawley motorway scheme. Dr O'Seaneachain has produced dozens of historic environment desk-based assessments, heritage statements and cultural heritage chapters for Environmental Statements and EIA reports for wind energy developments across the UK, including large-scale wind farm developments at Llangurig and Hendy Bank in Wales and multiple turbine developments (between 1-5 turbines in size) across England and Scotland.

Greg Bowen, Archaeology Consultant from ADAS assisted with the preparation of this memorandum. Greg has a Bachelor of Arts (Hons) in Ancient Greek & Roman Studies from Trent University (2016) and Master of Arts in Archaeology of the Ancient Mediterranean from Sheffield University (2018). He has produced numerous desk-based assessments for renewable energy projects and grid connection schemes, including



Tullacondra wind farm, Dublin Airport Solar Park, and Portarlinton Flood Relief Scheme (FRS).

2 REGULATORY & PRESCRIBED BODIES

2.1 Department of Housing, Local Government and Heritage

A submission response was received from the Department of Housing, Local Government and Heritage in relation to **EIAR Chapter 15 Archaeology, Architectural and Cultural Heritage** (hereafter referred to as **EIAR Chapter 15**).

It is acknowledged that a joint National Monuments Service and National Parks and Wildlife Service scoping response was issued from the DAU on 13th October 2023 and that this response informed the scope of the Archaeological, Architectural and Cultural Heritage assessment.

The proposed conditions that would be attached to the planning consent for this development align with the outline mitigation strategy contained in **EIAR Chapter 15** and are in accordance with the Sample Conditions C3, C5 and C6 as set out in the OPR Practice Note PN03: Planning Conditions (October 2022).

3 GENERAL PUBLIC

3.1 Theme 1: Cultural heritage landscape

A number of general concerns were raised in the submission responses received from the general public in relation to the potential effect of the Proposed Development on Archaeology, Architectural and Cultural Heritage monuments and built heritage. These are addressed below.

It should be noted that the area of the Proposed Development was selected as the Clare County Development Plan 2023-2029 Vol 6 Clare Wind Energy Strategy identifies it as being located within an area where wind farm developments are considered 'Acceptable in Principle'.

The potential direct and indirect effects of all stages of the Proposed Development on Archaeology, Architectural and Cultural Heritage monuments and built heritage are assessed in **EIAR Chapter 15** in accordance with the guidance referenced in Section 15.4.1 presented therein. The summary of residual effects of the development on the most significant archaeological, architectural and cultural heritage receptors (which are defined within the chapter) is laid out in Table 15.17 of **EIAR Chapter 15**.

It has been assessed that following a mitigation strategy that will be agreed with Clare County Council and the National Monuments Service as a condition of planning consent there will be No Significant Effects (Neutral to Not Significant) effects to the historic environment. This aligns with the Clare County Development Plan Objective 16.1.

3.1.1 Concerns regarding the potential effects of the Proposed Development on the archaeological, architectural and built heritage potential of the wider landscape

Some submissions refer to the archaeological, architectural and built heritage potential of the wider landscape. This potential is acknowledged in **EIAR Chapter 15**. The project design was informed by archaeological desk-based assessment and field inspection. During the design stage, the locations of the various elements of the Proposed Development were revised in order to avoid direct effects to all known archaeological sites and built heritage structures recorded on the standard baseline datasets which are used to inform Archaeological, Architectural or Cultural Heritage Assessments in Ireland (e.g. The Sites and Monuments Record, The Record of Monuments and Places, the National Inventory of Architectural Heritage, the list of National Monuments in County Clare etc.).

We note that a third-party report contained within the submissions documents received appears to conflate the locations of monuments and buildings located in the areas of both the Knockshanvo Wind Farm, the Oatfield Wind Farm and the Gortacullin Natural Heritage Area (NHA). We also note that the Green Area used to represent the extent of the Oatfield Windfarm shown in this same third-party report covers a much wider area than the actual red line boundary and bears no relation to the actual red line boundary. For these reasons, the distances that individual monuments are located in relation to the red line boundary cited in both this third-party report and the submissions received that refer to this report are either incorrect or misleading. For example, Formoyle Hillfort is

discussed as being located '1.5km from the study area'. This monument is actually located 2.5km from the red line boundary at its nearest point.

Site visits were also undertaken to ensure that, as far as possible, that the locations chosen for the various elements of the Proposed Development avoid potential unregistered heritage assets (e.g. such as Mary Anne's stone cottage, the ruins of Dysart Lyons and Brohan's homesteads, recreational areas known as Mass Place and the Stepping Stones).

In fact, none of the monuments or buildings specifically referenced in the submission documents received will be directly affected by the Proposed Development. The Proposed Development is therefore in accordance with the Clare County Development Plan Objective 16.1

3.1.2 Concerns regarding the potential effects of the Proposed Development on the 19th century historic landscape potential of the area

The 19th century historic landscape potential of the area has been assessed in **EIAR Chapter 15**.

Historic Ordnance Survey maps from the 19th century were assessed and the various elements of the Proposed Development were moved in the design stage to avoid all potential historic structures shown on these maps and to minimize impacts to historic field boundaries and roads/trackways.

The 19th century sites of potential heritage significance closest to the Proposed Development which are specifically referenced in the submission documents received are in fact all located several hundred metres away from the actual red line boundary. For example, the penal mass site in Crag townland (552897, 670012) is located 825 metres to the north of the red line boundary. The penal mass site in Hurdlestown townland (555637, 670586) is located over 420 metres from the red line boundary. The third penal mass site, located at Knockshanvo Wedge Tomb, is located over 1 km from the red line boundary. None of these three sites will be directly affected by any part of the Proposed Development.

The third-party report received alongside the submissions specifically refers to 'A Famine Road' known as 'The Line'. This road, which is shown on Figure 10 of the third-party report is actually located over 750m from the nearest part of the red line boundary. It will not be affected by any part of the Proposed Development.

Site visits were also carried out to ensure, as far as possible, that the locations chosen for the various elements of the Proposed Development avoid surviving upstanding historic field boundaries, structures of potential historic significance, lazy beds and trackways. This is in accordance with Clare County Development Plan Objective 16.1.

The potential effects of the parts of the Proposed Development that cross sections of surviving historic field boundaries and sections of potential 19th century roads/tracks will be addressed through a mitigation strategy agreed with Clare County Council and the National Monuments Service as a condition of planning consent.

3.1.3 Concerns regarding the potential effects of the Proposed Development on currently unknown buried archaeological remains in the area of the Proposed Development

Several of the submissions allude to the potential for currently unknown buried archaeological remains to be present in the area of the Proposed Development. This potential has also been acknowledged and assessed in **EIAR Chapter 15**.

The potential effects on currently unknown buried archaeology will be addressed through a mitigation strategy agreed with Clare County Council and the National Monuments Service as a condition of planning consent.

The submissions documents received have cited Section 14 (1) of the National Monument Act, 1930 and we agree that all groundworks and archaeological mitigation for this project agreed with the National Monuments Service and Clare County Council will be carried out in accordance with this Act (or the Historic and Archaeological Heritage Bill 2023, once enacted).

All archaeological fieldwork will be carried out by a suitably qualified licenced archaeologist, and all groundworks and archaeological mitigation for this project agreed with the National Monument Service and Clare County Council will be carried out in accordance with all relevant statutory legislation (National Monuments Act 1930 or The Historic and Archaeological Heritage and Miscellaneous Provisions Bill 2023, once enacted).

3.1.4 Concerns regarding the potential cumulative effects of the Proposed Development

The cumulative effects of the Proposed Development alongside the Knockshanvo Development (which is not associated) are assessed within **EIAR Chapter 15** and also within **EIAR Chapter 14 Landscape and Visual**.

The overall likely cumulative significance of effect on the settings of all Architectural Conservation Areas (ACAs), Protected Structures and National Inventory of Architectural Heritage Sites is likely to be - Significant (an effect which, by its character, magnitude, duration or intensity, alters a sensitive aspect of the historic environment).

The overall likely cumulative significance of effect on Recorded Monuments will likely remain neutral. The overall likely cumulative significance of effect on unregistered buildings, earthworks and field boundaries of heritage interest will likely be - moderate adverse (an effect that alters the character of the historic environment in a manner that is consistent with existing and emerging baseline trends). This will primarily be due to potential cumulative loss of unregistered upland field boundaries, trackways and currently unknown buried archaeology in the locations of the windfarm developments. There is limited potential that currently unknown buried archaeology may be truncated or removed by the groundworks for the grid connection routes of both the Oatfield Wind Farm and the Carrowmagowan Wind Farm along the R471.

3.1.5 Concerns regarding place-name analysis

The analysis of place-names undertaken in **EIAR Chapter 15** was undertaken using translations provided by Logainm.ie¹. This database is considered to be one of the most authoritative sources of information on place-names for use in this assessment.

We acknowledge that different translations of place-names can be made which can change how they are interpreted. Nevertheless, the examples cited in the submissions do not materially change the assessment of the archaeological potential of the areas which the Proposed Development will affect, our assessment of significance of the historic environment resource of those areas, or our outline mitigation strategy.

3.1.6 Concerns regarding data used in the assessment not being up to date

The submissions received contained an incorrect statement that the SMR/RMP database with which we are working is outdated. Our data is correct and up to date at the time of writing **EIAR Chapter 15**. The rock art panel in Coolycasey cited by the submissions received as omitted from our Study Area is located 240m outside of our 1 km Study Area, and 1.24 km outside of the red line boundary, which is why it was not included in the 1 km Study Area used in **EIAR Chapter 15**.

3.2 Theme 2: Effects on Doon Lough Natural Heritage Area

A number of specific concerns were raised in the submission responses received from the general public in relation to the potential effect of the Proposed Development on the Doon Lough Natural Heritage Area. These are addressed below.

It should be noted that the area of the Proposed Development was selected as the Clare County Development Plan 2023-2029 Vol 6 Clare Wind Energy Strategy identifies it as being located within an area where wind farm developments are considered 'Acceptable in Principle'.

The potential indirect effects of all stages of the Proposed Development on Archaeology, Architectural and Cultural Heritage monuments and built heritage are assessed in **EIAR Chapter 15** in accordance with the guidance referenced in Section 15.4.1 and the methodology laid out in Section 15.4.

The categories of archaeological, architectural and cultural heritage receptors were assessed in Section 15.5 of **EIAR Chapter 15**. It should be noted that Natural Heritage Area (NHA) is a basic designation for wildlife. According to the National Parks and Wildlife Service, NHAs are 'an area considered important for the habitats present or which holds species of plants and animals whose habitats needs protection' (National Parks and Wildlife Service Website, 2024). As an NHA is a wildlife designation, it is for this reason

¹ Logainm.ie is described by the website itself as 'a comprehensive management system for the placenames data, records and research of the State'. Logainm is a research project of the Gaois research group, Fiontar and Scoil na Gaeilge (DCU) and Dr Brian Ó Raghallaigh is the project Principal Investigator. It is therefore considered to be one of the most authoritative source of information on place-names for use in this assessment.

that NHAs like Doon Lough are not included in the categories of baseline receptors assessed in the **EIAR Chapter 15**.

While Doon Lough NHA does contain both upstanding historic buildings, monuments, and the potential for both buried and underwater archaeology, the Proposed Development will not directly affect any of these as they are located outside of the Proposed Windfarm Development Areas, the Grid Connection Route and the Turbine Delivery Route.

There are several monuments recorded in the vicinity of Doon Lough, including a Crannog (CL043-118) and a Castle (CL044-088) in the submissions. These are categorised as Recorded Monuments in accordance with the methodology for assessment defined in Table 15.2 of **EIAR Chapter 15** and are considered to have a Medium sensitivity to the effects of the Proposed Development on their setting. They were not individually assessed within the defined Study Areas as they are located more than 1km from the red line boundary.

Nevertheless, using the same assessment methodology as described in **EIAR Chapter 15**, it is considered that the Proposed Development is likely to have a long term (during the operational phase) low magnitude of change effect on the setting of the Record Monuments around Doon Lough. It will likely have an adverse indirect effect on the significance these Recorded Monuments. However, the significance of this effect will be at worst Not Significant adverse (An effect which causes noticeable changes in the character of the historic environment, on archaeological features or monuments or on architectural heritage but without significant consequences). This effect will also be reversible.

It is considered therefore that the Proposed Development will have No Significant Effects (Not Significant) on the archaeological, architectural and cultural heritage significance of the Recorded Monuments in the area of Doon Lough Natural Heritage Area.

A detailed assessment of the indirect effects of the Proposed Development on the setting and heritage significance of the key Archaeological, Architectural and Cultural Heritage Receptors defined in Section 15.4 and Section 15.5 of **EIAR Chapter 15** is laid out in Sections 15.6 to 15.8. An assessment of the cumulative effects of all existing, proposed and consented windfarms is also presented in Section 15.10 of **EIAR Chapter 15**.

The summary of residual effects of the development on the most significant archaeological, architectural and cultural heritage receptors is laid out in Table 15.17 of **EIAR Chapter 15**.

It has been assessed that following a mitigation strategy that will be agreed with Clare County Council and the National Monuments Service as a condition of planning consent there will be No Significant Effects (Neutral to Not Significant) effects to the historic environment. This aligns with the Clare County Development Plan Objective 16.1.

3.3 Theme 3: Effect on Oatfield Church – a protected structure

A number of specific concerns were raised in the submission responses received from the general public in relation to the potential effect of the Proposed Development on the St Vincent de Paul's Church, Oatfield. These are addressed below.

EIAR Chapter 15 identifies and recognizes the archaeological, the architectural and the cultural heritage significance of the St Vincent de Paul's Church Oatfield as a Protected Structure (RPS Number 665) and as a monument recorded on the Sites and Monuments Record (SMR Number CL052-043).

The potential direct and indirect effects of all stages of the Proposed Development on St Vincent de Paul's Church Oatfield are assessed in Section 15.4.1 of **EIAR Chapter 15**.

The assessment shows that the only part of the Proposed Development with potential to directly affect buried archaeological remains associated with the St Vincent de Paul's church is the construction phase of the Grid Connection Route.

The St Vincent de Paul's Church Protected Structure and Recorded Monument is located within 100m of the Grid Connection Route. The Grid Connection Route will be dug through the existing public road adjacent to this Protected Structure and archaeological monument. There will be no direct effect on the building or monument during the construction phase. However, there is potential for currently unknown buried archaeological remains associated with the St Vincent de Paul's Church to be present within the public road outside of the modern curtilage of the church and churchyard which could be truncated and removed by groundworks for the cable trench at this location.

It should be noted that it is highly likely that there are already existing buried services (e.g. water, sewerage) contained underneath the existing public roads adjacent to the St Vincent de Paul's Church. The construction of these types of buried services and the construction of the roads themselves, will have truncated and removed buried archaeological deposits to the depths of the foundations of the road/and or service trench.

Therefore, this potential direct effect on currently unknown buried archaeology at this location is likely to be No Change – Low. Due to the likely limited potential of currently unknown archaeological remains within the existing public road at this location the significance of this effect these features will likely be at worst Not Significant (An effect which causes noticeable changes in the character of the historic environment, on archaeological features or monuments or on architectural heritage but without significant consequences).

It has been recommended in the outline mitigation strategy contained in Section 15.9 of **EIAR Chapter 15** that the groundworks at this location will be subject to a programme of archaeological monitoring to ensure that any potential buried archaeology within the road is identified and avoided or mitigated in consultation with Clare County Council and the National Monument Service. The construction of the cable trench in the public road will be set far away from the church building and curtilage itself to ensure that there is no possibility of structural damage as a result of the groundworks to the Protected Structure.

The potential indirect effect on the setting of the St Vincent de Paul Church is also assessed in Section 15.6.3.4.5 of **EIAR Chapter 15**.

Analysis of wireframe and photomontage views produced as part of this assessment, visual assessment of views from publicly accessible roads adjacent to this Protected Structure and desk-based analysis of sightlines using Google Earth indicates that the upper portions off the turbines will be visible along the skyline in close range views from the Church carpark looking north towards the upland areas of Crag and Snaty (Wilson). The steepness of the slope of the hillside to the north of the Church, the presence of a modern house and associated structures and the presence of mature trees immediately

to the north of the R471 will block some views of the wind turbines along the skyline behind the Church from this location.

The wind turbines will not be visible in views looking south and south-west from the modern R471 public road to the Church. Also, the turbines will not be visible in views from the entrance of the church looking westwards or in views looking from the Derrynaveagh road directly east towards the entrance of the Church. Therefore, the Proposed Development will not change the way this Protected Structure is normally viewed and understood in its setting.

The proposed changes to the views looking north from the Church and its immediate setting (the carpark) will not likely affect any significant historic views or sightlines that contribute to the significance of the setting of the Church. The visual change can also be reversed once the wind farm is decommissioned.

We would also note that the effects of any increase in construction traffic will be temporary, confined to the construction phase, and managed by the mitigation measures proposed in **EIAR Chapter 16 Traffic and Transport**.

For these reasons it is assessed the windfarm may have a long term (during the operational phase) medium effect on the setting of this Protected Structure and its curtilage. It will likely have an adverse indirect effect on the significance this Protected Structure and its curtilage. However, the significance of this effect will be at worst moderate adverse (an effect which alters the character of the environment in a manner that is consistent with existing and emerging baseline trends).

3.4 Theme 4: Effect on Sunyata Buddhist Centre

A number of concerns were raised in the submission responses in relation to the potential effect of the Proposed Development on the Sunyata Buddhist Centre. These are addressed below.

The Sunyata Buddhist Centre is not specifically mentioned in **EIAR Chapter 15** because neither the building itself, nor the site on which the building is located appears on the standard baseline datasets which are used to inform Archaeological, Architectural or Cultural Heritage Assessments in Ireland (e.g. The Sites and Monuments Record, The Record of Monuments and Places, the National Inventory of Architectural Heritage, the list of National Monuments in County Clare etc.).

The Sunyata Buddhist Centre is also located outside of the red line boundary approximately 1.8km north of Turbine 1. It is located over 2km from the Grid Connection Route and the Turbine Delivery Route. Therefore, there will be no direct physical effect from any part of the Proposed Development on either the buildings or the grounds of the Sunyata Buddhist Centre.

The Sunyata Buddhist Centre may be categorised as an unregistered cultural heritage site in accordance with the methodology for assessment defined in **EIAR Chapter 15**, Table 15.2. It is considered to have a Low sensitivity to the effects of the Proposed Development on its setting. It was not individually assessed within the defined Study Areas as it is located more than 100m from the red line boundary.

It is located at a similar range from the Proposed Development as the Belvoir House Protected Structure. Using the same assessment methodology as described in **EIAR**

Chapter 15, it is considered that the Proposed Development is likely to have a long term (during the operational phase) medium magnitude of change effect on the setting of this Unregistered Heritage Asset. It will likely have an adverse indirect effect on the significance this Unregistered Heritage Asset. However, the significance of this effect will be at worst moderate adverse (an effect which alters the character of the environment in a manner that is consistent with existing and emerging baseline trends). This effect will also be reversible.

It is considered therefore that the Proposed Development will have No Significant Effects (Not Significant) on the archaeological, architectural and cultural heritage significance of the Sunyata Buddhist Centre.