

Chapter 26 Addendum: Cultural Heritage





ORIEL WIND FARM PROJECT

Environmental Impact Assessment Report - Addendum Chapter 26 Addendum: Cultural Heritage

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Contents

26 CHAPTER 26 – CULTURAL HERITAGE.....	1
26.1 Introduction	1
26.2 Purpose of this chapter	2
26.3 Study area.....	2
26.4 Policy context	2
26.5 Consultation	2
26.6 Methodology to inform the baseline	2
26.6.1 Desktop study	2
26.6.2 Field assessment survey	2
26.6.3 Cultural heritage setting.....	2
26.7 Baseline environment	2
26.7.1 Introduction	2
26.7.2 Townlands and toponymy	3
26.7.3 Archaeological, architectural and cultural heritage designated sites.....	3
26.7.4 Outputs of the desk-based assessment and field assessment	3
26.7.5 Cultural heritage setting.....	8
26.7.6 Future baseline scenario	8
26.8 Key parameters for assessment	8
26.8.1 Project design parameters.....	8
26.8.2 Measures included in the Project.....	8
26.9 Impact assessment methodology	8
26.9.1 Overview	8
26.9.2 Impact assessment criteria	8
26.10 Assessment of significance.....	8
26.10.1 Construction activities with potential to impact on Areas of Archaeological Potential	8
26.10.2 Construction activities at the onshore substation site with potential to impact on identified feature	9
26.10.3 Construction activities with potential to impact on undisturbed greenfield areas	9
26.10.4 Effects of the offshore wind farm on setting	9
26.10.5 Construction activities with potential to impact on Dunany Demesne Boundary (RPS LHS019-009)	9
26.10.6 Mitigation and residual effects	9
26.10.7 Future monitoring	11
26.11 Cumulative Impact Assessment.....	11
26.12 Transboundary effects	11
26.13 Interactions.....	11
26.14 Summary of impacts, mitigation measures and residual effects	11
References	16

Tables

Table 26A-1: Areas of Archaeological Potential (AAP) within the planning application boundary for the onshore cable route of the Project at Dunany.....	5
Table 26A-2: Summary of potential environment effects, mitigation and monitoring.....	12

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

Figures

Figure 26A-1: View looking west to the laneway entrance to Dunany beach (indicated by an arrow), view east along the laneway	3
Figure 26A-2: Dunany Demesne (RPS LHS019-009, NIAH Garden Survey GS1) shaded on the first edition OS Map 1836 and aerial survey and the location of the works area in the demesne.....	4
Figure 26A-3: Rubble stone boundary wall to Dunany Demesne (RPS LHS019-009) and gate pier on the left-hand side of the laneway.	4
Figure 26A-4: Southern entrance into Dunany Demesne part of RPS LHS019-009	5
Figure 26A-5: Amended Transition Joint Bay Option 1	6
Figure 26A-6: Amended Transition Joint Bay Option 2	7

26 CHAPTER 26 – CULTURAL HERITAGE

26.1 Introduction

This Addendum provides information to supplement the assessment of cultural heritage presented in chapter 26: Cultural Heritage of the Environmental Impact Assessment Report (EIAR) (2024) (volume 2C).

In response to the Request for Further Information (RFI) from An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case reference ABP-319799-24) for the Oriel Wind Farm Project (hereafter referred to as “the Project”), the location of the export cable at the landfall (above the HWM) at Dunany including the location for the Transition Joint Bay (TJB) (options 1 and 2) have been adjusted within the planning application boundary. The adjustments have been made to address concerns regarding potential impacts on the cliff and coastal habitats as outlined in items 6.K. and 8.G. on the Schedule – Further Information Request. This has removed the requirement to install the export cable through the cliff (using sheet piles to support the works). Further details on the adjusted design are provided in chapter 5 Addendum: Project Description (EIAR volume 2A Addendum).

The purpose of this Addendum is to present an assessment of the revised export cable and transition joint bay locations at Dunany and to determine whether the adjusted design, introduced to avoid the cliff, gives rise to any new or altered impacts on cultural heritage.

The other amendments to the Project within the planning application boundary described in chapter 5 Addendum: Project Description regarding the adjustment of the cable route along the N33 (between the onshore substation and M1), adjustments to two temporary accesses (leading onto the N33) and the change in layout of temporary compound (west of the M1) have also been reviewed. However, these amendments do not affect or change the assessment in chapter 26: Cultural Heritage (EIAR volume 2C).

The section and subsection headings in this Addendum correspond to those used in chapter 26: Cultural Heritage of the EIAR. However, within the ‘Assessment of Significance’ section (26.10), one new impact assessment has been added to provide an assessment of ‘Construction activities with potential to impact on Dunany Demesne Boundary (RPS LHS019-009)’ (section 26.10.5). Therefore, the numbering of the subsequent subheadings, including ‘mitigation and residual effects’ and ‘future monitoring,’ has been adjusted. The reader is directed to review the information presented in this Addendum alongside the assessment presented in the EIAR chapter.

26.2 Purpose of this chapter

There are no changes to EIAR chapter 26: Cultural Heritage.

26.3 Study area

There is no change to the study area as defined in section 26.3 of EIAR chapter 26: Cultural Heritage. However, within this established study area, two layout options (Option 1 and Option 2) for the export cable and TJB at Dunany are now presented for assessment. The assessment considers whether either option gives rise to any new or altered cultural heritage impacts within the defined study area.

26.4 Policy context

The policy context as presented in section 26.4 of EIAR chapter 26: Cultural Heritage has remained substantially unchanged. However, certain provisions of the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 have now been commenced.

The Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023 was enacted in October 2023 and this Act is now law. The Minister for DHLGH commenced certain provisions in May 2024 (S.I. No. 252/2024) which relate to World Heritage Property in the State, inventories, the protection of certain records, the promotion of heritage, and the issuing of statutory guidance. Certain related and supporting provisions concerning implementation and enforcement are also commenced. Further provisions in December 2024 (S.I. No. 663/2024) relate to underwater cultural heritage and another Commencement Order in March 2025 (S.I. No. 88/2025) relates to prohibitions, offences, defences and procedural matters.

However, until the Act is fully commenced, the National Monuments Acts and the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act have not yet been repealed and therefore remain in force.

26.5 Consultation

There are no changes to EIAR chapter 26: Cultural Heritage.

26.6 Methodology to inform the baseline

26.6.1 Desktop study

There are no changes to EIAR chapter 26: Cultural Heritage.

26.6.2 Field assessment survey

Details of an intertidal archaeology survey of the landfall location, carried out by ADCO on 13 January 2025, which included a metal detector survey during Low Water, are presented in appendix 15-2: Intertidal Archaeology Survey Report. Chapter 15 Addendum: Marine Archaeology provides a description of the intertidal baseline environment following completion of the intertidal survey in January 2025. Overall, the findings of this survey have not resulted in any change to the conclusion of the assessment presented in chapter 26: Cultural Heritage (EIAR volume 2C).

26.6.3 Cultural heritage setting

There are no changes to EIAR chapter 26: Cultural Heritage.

26.7 Baseline environment

26.7.1 Introduction

There are no changes to EIAR chapter 26: Cultural Heritage.

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM**26.7.2 Townlands and toponymy**

There are no changes to EIAR chapter 26: Cultural Heritage.

26.7.3 Archaeological, architectural and cultural heritage designated sites

There are no changes to EIAR chapter 26: Cultural Heritage.

26.7.4 Outputs of the desk-based assessment and field assessment

The results of the output of the desk-based assessment and field assessment are provided in appendix 26-1: Cultural Heritage Report (EIAR volume 2C) and remain unchanged with the exception of the revised cable route options from the Dunany landfall. For the purposes of this amendment, the baseline has been updated solely to describe the two cable route options within the established study area.

The proposed landfall on the sand and shingle beach to the south of Dunany Point remains unchanged. This area is accessed via a narrow east–west laneway leading directly to the shoreline (Figure 26A-1). For both options, the cable route runs west along the laneway, avoiding the low sea cliff that extends along the coastline. The laneway lies immediately south of the boundary of Dunany Demesne, the historic extent of which is shown as a shaded area on the first edition OS map (RPS LHS019-009, NIAH Garden Survey GS1, Figure 26A-2). The principal buildings and historic features are concentrated in the central area of demesne lands. This core area is surrounded by a thick shelterbelt of trees, resulting in limited outward views to the surrounding landscape/fields.



Figure 26A-1: View looking west to the laneway entrance to Dunany beach (indicated by an arrow), view east along the laneway

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM



Figure 26A-2: Dunany Demesne (RPS LHS019-009, NIAH Garden Survey GS1) shaded on the first edition OS Map 1836 and aerial survey and the location of the works area in the demesne.

Within the demesne, the southernmost boundary is concealed by a broad impenetrable band of vegetation overgrowth (c.10m deep). However, from the beach laneway to the south, outside the demesne, a rubble stone wall can be seen to form the boundary. Although heavily overgrown with thick ivy, it appears largely continuous, with occasional collapsed wall/bank in places. The wall survives to a height of at least 2.5 m at the eastern end of the laneway, where there are a set of round rubble stone pillars also present (Figure 26A-3).



Figure 26A-3: Rubble stone boundary wall to Dunany Demesne (RPS LHS019-009) and gate pier on the left-hand side of the laneway.

Access to the temporary compound and construction access for both options is via the southernmost entrance to the Demesne; the entrance comprises a square rubble stone gateposts (one of which has a cement render) with a pyramidal stone cap with a modern galvanised field gate. On the western flank of the gate there is a rubblestone wall with stone 'soldier' coping (Figure 26A-4). This is a secondary farm entrance to the demesne, which is in contrast to the main entrance avenue to the east of the demesne, which has a decorative tree lined approach to the demesne core and principal buildings.

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM



Figure 26A-4: Southern entrance into Dunany Demesne part of RPS LHS019-009

Under TJB Option 1 (Figure 26A-5), the cable route continues west along the laneway leading to the Dunany beach, with the TJB located approximately 300 m west of an existing layby at the top of the laneway. All works associated with the TJB would be contained entirely within the footprint of the existing laneway. This option will avoid any impact on the cliff face on Dunany Beach and does not impact the southernmost boundary of the demesne. A temporary construction access road would use the existing demesne/field entrance, and approximately 0.35 ha in the southwestern corner of the arable field is proposed to be used as a temporary construction compound.

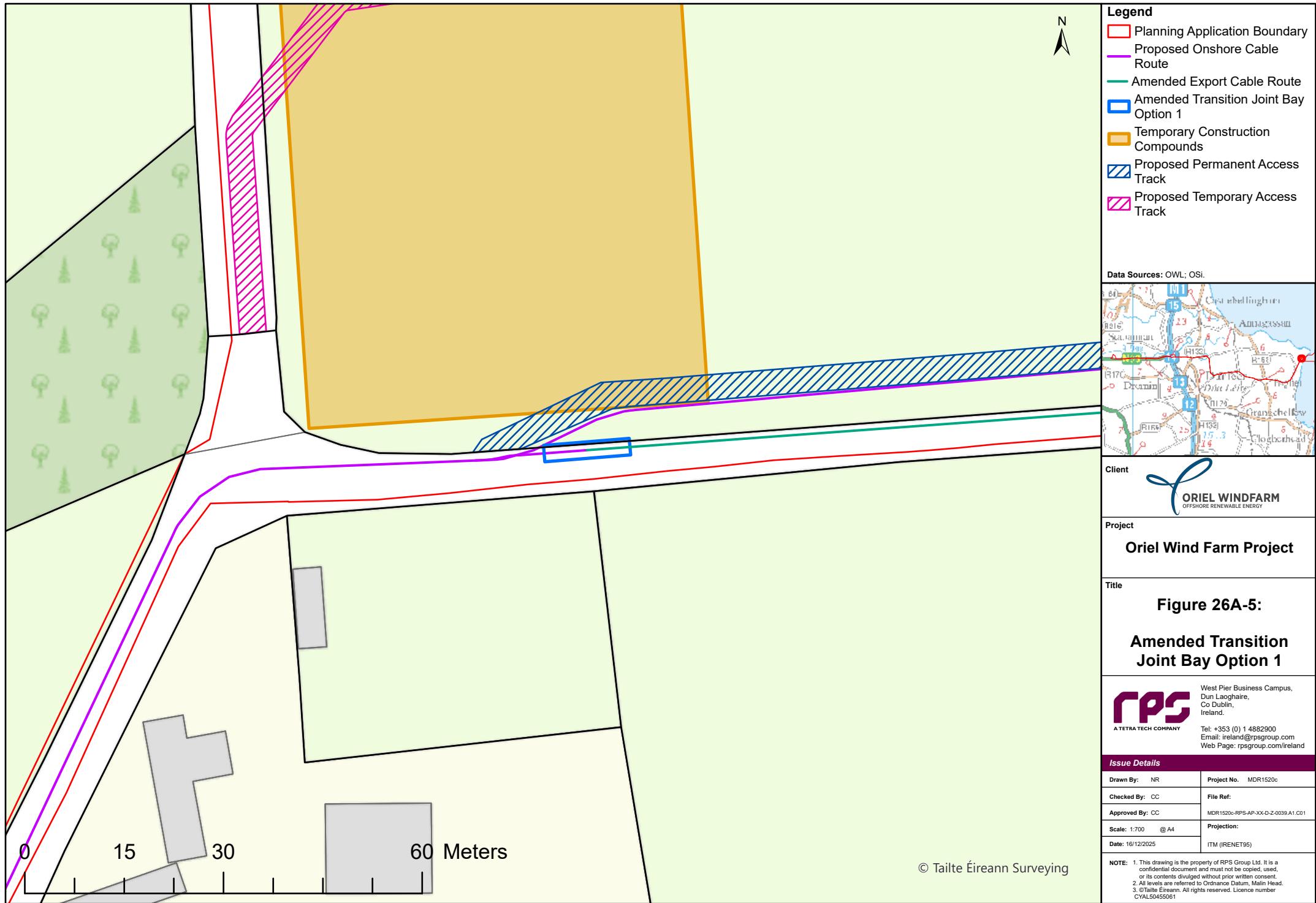
Under TJB Option 2 (Figure 26A-6), the TJB is proposed in the field adjacent to the laneway approximately mid-way along the laneway. This will involve a larger working area encompassing the laneway and also a larger working area within the demesne itself. An approximate 10 m section of the demesne boundary wall will be removed to facilitate the installation; this section of wall will be fully recorded prior to removal and reinstated on the completion of the works.

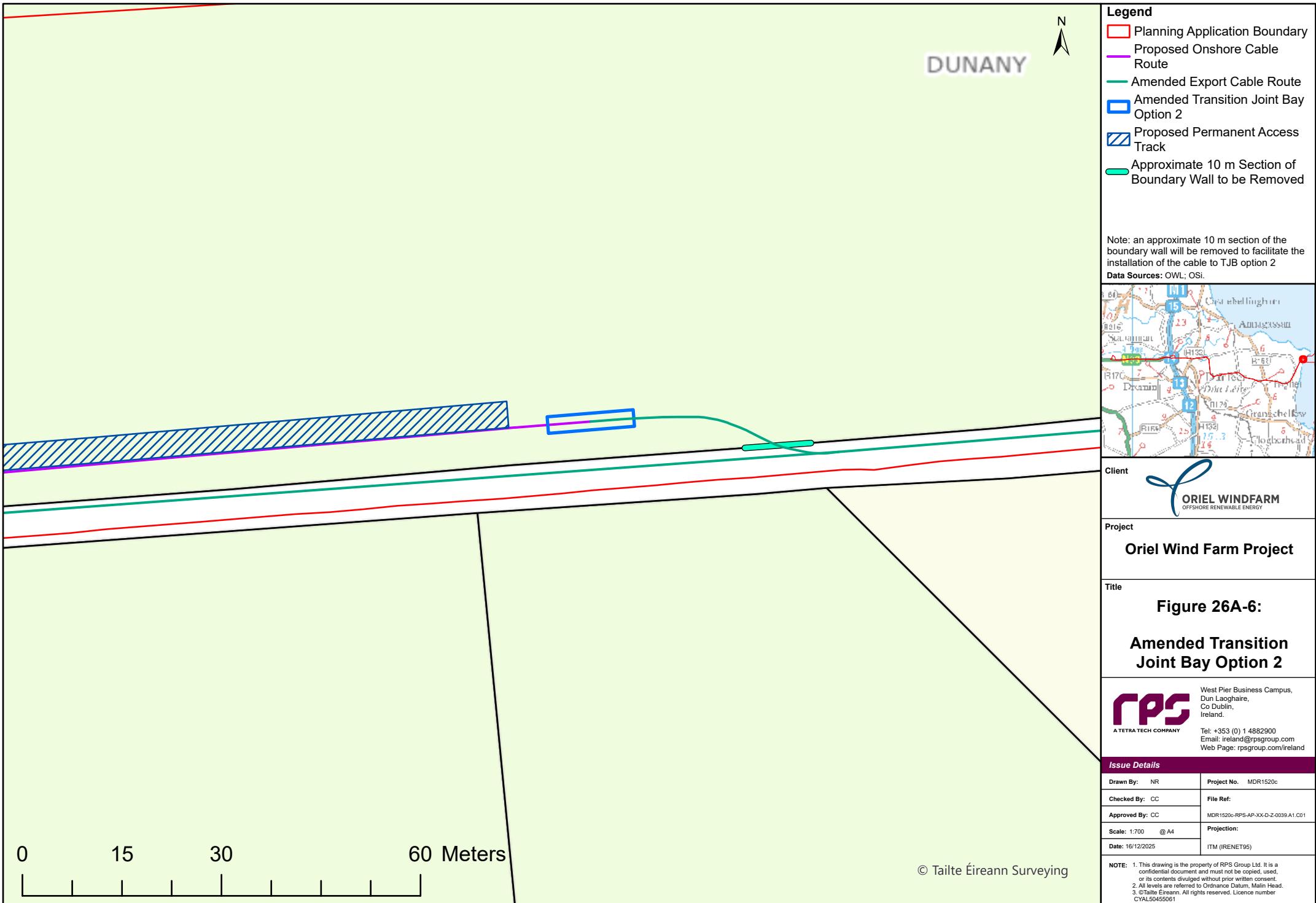
A permanent 4 m wide stone access track to the TJB will be constructed within the demesne, running 5 m inside and parallel to the southern boundary. The track will tie into the laneway at a point along the southern boundary where no stone wall survives. Up to 10 m of boundary comprising dense hedgerow vegetation will be removed, with no impact on any upstanding sections of the historic boundary. As with Option 1, a temporary construction access road would use the existing demesne/field entrance, and approximately 0.35 ha in the southwestern corner of the arable field would be used as a temporary construction compound.

There are no demesne landscape features within this field. It is a large irregularly shaped arable field with a dense shelterbelt of trees along its western side and lies well outside the principal core of the demesne with no visual connection between the two areas. A substantial wooded shelter belt encloses the core of the demesne where the principal buildings and designed landscape features lie, the area of the onshore cable route is well screened from it. A large number of stray archaeological finds dating to the prehistoric period have been found in the ploughsoil on Dunany Headland and as such this greenfield is considered to have a general subsurface archaeological potential (AAP1). Table 26A-1 lists the Areas of Archaeological Potential (AAP) within the planning application boundary at Dunany.

Table 26A-1: Areas of Archaeological Potential (AAP) within the planning application boundary for the onshore cable route of the Project at Dunany.

CH	Site Type	Townland	Location
AAP1	General greenfield potential	Dunany	Greenfield within Dunany Demesne. A large number of stray finds dating to the prehistoric have been found in the ploughsoil on Dunany Headland.
RPS LHS019-009, NIAH Garden Survey GS1	Dunany Demesne - Demesne wall (overgrown with vegetation)	Dunany	Southernmost boundary of Dunany Demesne running parallel to the beach access laneway





ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

26.7.5 Cultural heritage setting

There are no changes to EIAR chapter 26: Cultural Heritage.

26.7.6 Future baseline scenario

There are no changes to EIAR chapter 26: Cultural Heritage.

26.7.7 Data limitations

There are no changes to EIAR chapter 26: Cultural Heritage.

26.8 Key parameters for assessment

26.8.1 Project design parameters

There are no changes to EIAR chapter 26: Cultural Heritage.

26.8.2 Measures included in the Project

The following updated measure is proposed to reduce the impact on cultural heritage for the cable route at the Dunany landfall.

All upstanding sections of the Dunany Demesne boundary wall, outside the sections impacted by works associated with the cable route TJB options, will be preserved in situ and protected during construction. A clear no-go buffer of approximately c. 5m will be established, with no plant or permitted within this zone. Any activity taking place close to the wall also will be supervised by a licensed archaeologist to ensure there is no accidental impact or disturbance.

26.9 Impact assessment methodology

26.9.1 Overview

There are no changes to EIAR chapter 26: Cultural Heritage.

26.9.2 Impact assessment criteria

There are no changes to EIAR chapter 26: Cultural Heritage.

26.10 Assessment of significance

26.10.1 Construction activities with potential to impact on Areas of Archaeological Potential

There is potential for the construction activities associated with the onshore cable route options to impact AAP1, an Area of Archaeological Potential within Dunany Demesne. The construction activities for cable route options emerging from the landfall (Option 1 and Option 2) include the TJB, cable trenching and temporary access roads and compounds. This does not alter the conclusion of the impact outlined in section 26.10.1 of chapter 26: Cultural Heritage (EIAR volume 2C), which states that any earthmoving within and around Dunany Demesne may reveal stray finds, previously unrecorded sites, or isolated archaeological features dating from the prehistoric period onwards. As before the overall magnitude of the impact is medium, and the sensitivity of the archaeology is low. The overall significance of the effect on potential archaeological sites/features will, therefore, be of slight significance, which is not significant in EIA terms.

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

26.10.2 Construction activities at the onshore substation site with potential to impact on identified feature

There are no changes to EIAR chapter 26: Cultural Heritage.

26.10.3 Construction activities with potential to impact on undisturbed greenfield areas

There are no changes to EIAR chapter 26: Cultural Heritage.

26.10.4 Effects of the offshore wind farm on setting

There are no changes to EIAR chapter 26: Cultural Heritage.

26.10.5 Construction activities with potential to impact on Dunany Demesne Boundary (RPS LHS019-009)

Dunany Demesne Southern Boundary

TJB Option 2 will require the removal of up to 10 m section of rubble stone wall associated with the southern boundary of Dunany demesne during construction. A permanent access track to the TJB will cross the southern boundary of the demesne to the laneway at a layby where no stone wall survives. At this location, approximately 10 m of boundary comprising dense hedgerow vegetation will be removed, with no impact on any upstanding sections of the historic boundary. The demesne's principal structures are Protected Structures (RPS LHS019-009), and its gardens are included in the NIAH Garden Survey (GS-1).

Magnitude of impact

The magnitude of impact on the southern demesne boundary wall is assessed as medium, the works will result in the partial removal of the demesne wall.

Sensitivity of the receptor

The southern boundary of Dunany Demesne forms part of a functional estate boundary adjacent to a secondary farm entrance, and while it is considered to form part of the attendant grounds of the demesne it does not form part of the principal designed landscape nor does it contribute to the architectural core or significance of the demesne and as such the wall itself is of itself considered to be of medium sensitivity.

Significance of the effect

Overall, the magnitude of the impact is medium, and the sensitivity of the receptor is medium. Although this change will be visible, it does not undermine the overall integrity, character, or legibility of the demesne, and the intervention remains limited in extent and capable of reinstatement. The overall significance of the effect on the wall is of **moderate** significance.

26.10.6 Mitigation and residual effects

The following mitigation measures will be implemented at Dunany.

Construction activities with potential to impact on Areas of Archaeological Potential

AAP1 – Dunany Demesne

Although the onshore cable route options have a slightly different footprint, the mitigation measures outlined for AAP1 section 26.10.5 of chapter 26: Cultural Heritage (EIAR volume 2C) remain unchanged.

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

Dunany Demesne (RPS LHS019-009) Southern Boundary

The following additional mitigation measures are required for the southern boundary wall of Dunany Demesne for the sections of wall that will be directly impacted by cable route Option 2:

- *Pre-construction vegetation clearance, inspection and method statement for demolition and reconstruction:* All vegetation along the required sections of the demesne boundary wall will be removed by hand under the supervision of a licensed archaeologist and in accordance with a method statement prepared by a built-heritage specialist. Clearance will be carried out in a controlled manner to expose the wall fabric without causing damage.
- *Detailed drawn, photographic and condition survey:* Once exposed, a full measured survey of the wall will be carried out, including identification of key features, such as coping stones, changes in construction, and areas of deterioration. Recording of distinctive stones (coping, quoin stones, gate-piers, unusually large or shaped blocks) including a record of construction, mortar type, coping style, bonding pattern and any architectural features; the survey will also include a condition assessment noting areas of collapse, voids, previous repairs and fabric integrity. This record will form the basis for reinstatement.
- *Conservation-led construction method statement:* A method statement will be prepared by a conservation architect, setting out the reconstruction technique, sequencing, materials, mortar specification and workmanship standards.
- *Controlled dismantling of affected sections:* Any section of the wall to be removed will be dismantled by hand under archaeological supervision. All salvageable stone will be retained for reuse during reinstatement under conservation supervision. All original fabric will be retained unless demonstrably unsafe or degraded beyond reuse.
- *Protection, storage and cataloguing of stone:* Recovered stone will be stored on timber pallets or in labelled crates in a secure location within the site. A catalogue of stone type, size and location will be maintained to ensure accurate reconstruction.
- *Reconstruction of the wall using original fabric and techniques:* Following completion of the cable works, the boundary wall will be reconstructed to match its original profile, alignment, coursing, bonding pattern and coping detail. Original stone will be reused wherever possible; any new stone required will match the existing in geology, size, tooling and appearance. Mortar will be mixed to match surviving material in composition and colour.
- *Monitoring during dismantling and reinstatement:* Both demolition and reconstruction phases will be monitored by the project archaeologist and conservation specialist to ensure correct handling of original fabric and fidelity to the pre-construction record.
- *Protection of upstanding sections of the demesne wall:* All upstanding sections of the Dunany Demesne boundary wall outside the impacted sections will be preserved in situ and protected during construction within Dunany Demesne. A robust fence marking a clear no-go buffer (c. 5m from the wall) will be put in place, with no plant or materials allowed inside it. Any activity taking place close to the wall along the laneway on the southern side during the cable installation will be supervised by a licensed archaeologist to ensure there is no accidental impact or disturbance.

Residual effects

Once the mitigation measures are implemented in full, identified and previously unknown subsurface archaeological features that are identified will be resolved and recorded in full. The residual effects would be reduced to imperceptible, and this would result in a significance of effect of negligible which is not significant in EIA terms. There is a slight beneficial impact whereby retrieved archaeological information will inform a new understanding of the archaeological landscape (AAP1).

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

There will be no residual effects to Dunany Demesne as the impacted section of wall will be reinstated in full.

26.10.7 Future monitoring

There are no changes to EIAR chapter 26: Cultural Heritage.

26.11 Cumulative Impact Assessment

An updated Cumulative Impact Assessment is provided in EIAR volume 2A Addendum, appendix 3-2: Cumulative Impact Assessment Report. The assessment concludes that there is no change to the cumulative assessment conclusions provided in chapter 26: Cultural Heritage (EIAR Volume 2C).

26.12 Transboundary effects

There are no changes to EIAR chapter 26: Cultural Heritage.

26.13 Interactions

There are no changes to EIAR chapter 26: Cultural Heritage.

26.14 Summary of impacts, mitigation measures and residual effects

Table 26A-2 presents an updated summary of the potential impacts, mitigation measures and residual effects in respect to cultural heritage. Changes are shown in blue text.

Construction works associated with the cable options at Dunany (AAP1) may uncover previously unrecorded archaeological features or finds. Taking account of this baseline, the magnitude of impact is assessed as medium, the archaeological sensitivity as low, and the overall significance of effect as slight.

The construction of either of the cable route options will result in the removal of sections of the southern boundary wall associated with Dunany Demesne (RPS LHS019-009, NIAH Garden Survey GS-1). Overall, the magnitude of impact is assessed as medium, and the sensitivity of the boundary wall as medium. While the removal will be noticeable, it will not undermine the wider integrity, character, or legibility of Dunany Demesne, and the intervention is limited in extent and capable of reinstatement. The resulting significance of effect on the wall is therefore considered moderate.

Once the mitigation measures are fully implemented, any identified subsurface archaeological features will be resolved and recorded, reducing residual effects to imperceptible and resulting in a negligible significance of effect, with a slight beneficial gain from the new archaeological information recovered (AAP1). The affected section of the Dunany Demesne boundary wall will be reinstated, and no residual effects will arise.

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

Table 26A-2: Summary of potential environment effects, mitigation and monitoring.

Potential impact	Phase			Measures included in the Project	Magnitude of impact	Sensitivity of receptor	Significance of effect	Additional measures	Residual effect	Proposed monitoring
	C	O	D							
Onshore cable route: AAP1 – Dunany Demesne and Beach	✓	✗	✗	None	Medium	Low	Slight	Archaeological monitoring of the earthmoving works under license to the DHLGH to ensure any potential archaeological features are identified and appropriately resolved through either preservation by record (excavation) or preservation in situ.	Imperceptible and slight beneficial.	None
Onshore cable route: Dunany Demesne Southern Boundary (RPS LHS019-009, NIAH Garden Survey GS-1).	✓	✗	✗	None	Medium	Medium	Moderate	Pre-construction vegetation clearance, inspection and method statement for demolition and reconstruction. Detailed drawn, photographic and condition survey. Conservation-led construction method statement. Controlled dismantling of affected sections. Protection, storage and cataloguing of stone. Reconstruction of the wall using original fabric and techniques. Monitoring during dismantling and reinstatement.	None	None
Onshore cable route: AAP2 – Port/Boycetown	✓	✗	✗	None	Medium	Low	Slight	Archaeological monitoring of the earthmoving works under license to the DHLGH to ensure any potential archaeological features are identified and appropriately resolved through either preservation by record (excavation) or preservation in situ.	Imperceptible and slight beneficial	None

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

Potential impact	Phase			Measures included in the Project	Magnitude of impact	Sensitivity of receptor	Significance of effect	Additional measures	Residual effect	Proposed monitoring
	C	O	D							
Onshore cable route: AAP3 – Clonmore	✓	✗	✗	None	Medium	Medium	Moderate	All earthmoving works associated with the cable installation in the area adjacent to the recorded archaeological sites in Clonmore (AAP3), including any temporary/enabling works associated with the development will require archaeological monitoring under license to the DHLGH. The purpose of monitoring is to identify any archaeological material or features are uncovered during ground disturbance works.	Imperceptible and slight beneficial	None
Onshore cable route: AAP4 – Drumcar	✓	✗	✗	None	Medium	Medium	Moderate	It is recommended that the wayleave for the proposed cable route be stripped of topsoil to the surface of archaeological deposits under archaeological direction as an archaeological exercise in advance of the cable trenching. This will allow time for any archaeological remains within the wayleave to be archaeologically excavated and preserved by record under licence to the NMS.	Imperceptible and slight beneficial	None
Onshore cable route: AAP5 – Greenfield (Charleville Drumgoolestown)	✓	✗	✗	None	Medium	Low	Slight	Archaeological monitoring in advance of construction, archaeology will be identified and resolved.	Imperceptible and slight beneficial	None
AAP6 – Onshore substation site: Stickillin	✓	✗	✗	None	Medium	Medium	Moderate	It is recommended that two areas each measuring 20 m x 20 m be opened for full excavation and preservation by record in the areas of the burnt mound remains. This is to be carried out under licence to the National Monuments Service (NMS). It is also recommended that the area south of the Stickillin field be	Imperceptible and slight beneficial	None

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

Potential impact	Phase	C	O	D	Measures included in the Project	Magnitude of impact	Sensitivity of receptor	Significance of effect	Additional measures	Residual effect	Proposed monitoring
									stripped of topsoil under archaeological supervision well ahead of construction to establish if the feature identified and indicated on geophysical survey is archaeological, and if so to make provision for its excavation or preservation in situ as appropriate.		
Undisturbed greenfield areas: AAP7 – General Greenfield Archaeological Potential		✓	✗	✗	None	Medium	Low	Slight	Archaeological monitoring of the earthmoving works under license to the DHLGH to ensure any potential archaeological features are identified and appropriately resolved through either preservation by record (excavation) or preservation in situ.	Imperceptible and slight beneficial	None
Offshore wind farm and substation setting impacts: SET1: DOW057-003 (including DOW057-002); Greencastle Castle, Church, and well, fortification, and battlefield site, Greencastle		✗	✓	✗	None	Low	Very high	Slight	There are no mitigation measures for setting impacts, the impact on the setting of the site will remain for the duration of the Project.	Unchanged	None
Offshore wind farm and substation setting impacts: SET2: HB16/04/009; Haulbowline Lighthouse/Navigation Marker and associated lattice metal beacons, Greencastle		✗	✓	✗	None	Medium	Medium	Moderate	There are no mitigation measures for setting impacts, the impact on the setting of the site will remain for the duration of the Project.	Unchanged	None

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

Potential impact	Phase			Measures included in the Project	Magnitude of impact	Sensitivity of receptor	Significance of effect	Additional measures	Residual effect	Proposed monitoring
	C	O	D							
Offshore wind farm and substation setting impacts: SET6: RMP LH015-015001-003; National Monument in State Ownership No. 579, Lisnaran Fort	x	✓	x	None	Negligible	Very high	Slight	There are no mitigation measures for setting impacts, the impact on the setting of the site will remain for the duration of the Project.	Unchanged	None

ORIEL WIND FARM PROJECT – CULTURAL HERITAGE - ADDENDUM

References

There are no changes to EIAR chapter 26: Cultural Heritage.