

Cultural Heritage

Introduction

Tobar Archaeological Services Ltd prepared the archaeology and cultural heritage chapter, Chapter 13, of the EIAR which accompanied the planning application for the proposed Clonbern Wind Farm, County Galway. This document has been prepared in response to Prescribed Bodies Submissions and a request for Further Information (ABP 320087-24) concerning archaeology and cultural heritage received in relation to the proposed Clonbern Wind Farm grid connection.

Submissions

Prescribed Bodies

Two submissions pertaining to archaeology were received from a prescribed body with regard to the proposed Clonbern Wind Farm grid connection. The submissions were received from the Development Applications Unit (DAU) and Galway County Council (GCC).

The DAU submission noted the following requirements which it states should be included as a condition of any grant of planning permission:

‘Archaeological Requirements:

1. *All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 13 of the EIAR (Tobar Archaeological Services; date 20 June 2024) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.*
2. *The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service of the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.*
 - a. *The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in situ, preservation by record (archaeological excavation) and/or monitoring may be required.*
 - b. *Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of the Department, shall be complied with by the developer.*
 - c. *No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.*
3. *A suitably qualified archaeologist shall be retained to advise on and establish appropriate Exclusion Zones around the external-most elements of vulnerable Heritage Assets (as identified in Chapter 13 of the EIAR or by any subsequent investigations associated with the project).*
 - a. *Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the Department of Housing, Local Government and Heritage and the planning authority.*
 - b. *No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Exclusion Zones.*

4. *The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 13 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.*
5. *The applicant shall retain the services of a suitably qualified archaeologist to advise on an archaeological mitigation plan for decommissioning of the development, to include mitigation measures for the removal of the turbines and the protection of any archaeological sites and monuments that are in situ at the site. The Decommissioning Plan shall be updated to include the location of any archaeological or cultural heritage constraints as set out in Chapter 13 of the EIAR and by any subsequent archaeological investigations associated with the project. It shall clearly describe all identified likely impacts from decommissioning – both direct and indirect- and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during decommissioning works.*
6. *The planning authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.'*

The GCC submission states the following regarding architecture and archaeology and the proposed Grid Connection:

'There are no Protected Structures/ACA/Special Amenity Area Orders/Recorded monuments or National Monuments within the site boundary associated with the proposed development, therefore no direct impacts to this resource are identified. There are no protected structures/NIAH structures or recorded monumented located in the immediate vicinity of the site, same for GA0310951 which is located just outside of the grid connection site. The planning authority note the size of the subject and highlight Section 12.6.11 of the Galway County Development Plan 2022-2028, which requires that a proposed development (due to location, size or nature), which may have archaeological implications for archaeological heritage, is subject to an Archaeological Assessment (this includes areas close to archaeological monuments, extensive in area (half hectare or more) or length (1km or more) and development that require an Environmental Impact Statement). In this regard, the development site meets more than one of these criteria and therefore an archaeological testing and monitoring condition is advisable should An Bord Pleanála decide to grant planning permission for the proposed development.'

Response

The GCC submission advises that an archaeological testing and monitoring condition be attached to any grant of planning permission for the proposed development from An Coimisiún Pleanála. Both pre-development archaeological testing of the Proposed Project and archaeological monitoring at the construction stage of the Proposed Project were proposed as mitigation measures in Chapter 13 of the EIAR and therefore will be implemented in full should planning permission be granted. Further detail regarding this mitigation is presented below in the response to the DAU submission.

For clarity a response to each element of the archaeological requirements detailed in the DAU submission is presented below, where relevant.

Requirement:

1. *All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 13 of the EIAR (Tobar Archaeological Services; date 20 June 2024) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.*

Response:

As set out in Chapter 13 of the EIAR a number of mitigation measures are proposed regarding the recorded and unrecorded archaeological and cultural heritage resource. Approximately 1km of the Proposed Grid Connection underground electrical cabling, the proposed onsite 220kV substation and proposed interface masts and associated compounds are located in both peatland and pasture. Given the greenfield and peatland nature of these areas it is possible that previously unrecorded sub-surface archaeological finds, features or deposits are located within the footprint of the proposed onsite 220kV substation, along the proposed electrical cabling route where it extends through cutover bog and in the footprint of the proposed interface masts and associated compounds. The potential therefore exists that sub-surface archaeological sites or features, if present within these areas, may be directly affected by construction phase activities.

The mitigation measures proposed in Chapter 13 of the EIAR in relation to such sub-surface archaeology, and which will be implemented, are as follows:

- Pre-development archaeological testing of the Proposed Project infrastructure in peatland or greenfield areas will be carried out under licence from the National Monuments Service. This is in order to identify any archaeological features at the earliest stage possible in the project to allow time to deal with any requirements such as preservation in situ (redesign / avoidance) or preservation by record (archaeological excavation).
- A report on the testing will be compiled on completion of the work and submitted to the NMS and the Planning Authority.
- Further mitigation such as preservation in situ (avoidance), preservation by record (excavation), buffer zones may be required depending on the results of the testing.
- Archaeological monitoring of all groundworks during the construction stage of the Proposed Project by a licensed archaeologist.
- A report on the monitoring will be compiled on completion of the work and submitted to the NMS and the Planning Authority.

Requirement:

2. *The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service of the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.*
 - a. *the report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in situ, preservation by record (archaeological excavation) and/or monitoring may be required.*
 - b. *Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of the Department, shall be complied with by the developer.*
 - c. *No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.*

Response:

As detailed in Section 13.4.3.4 of Chapter 13 pre-development archaeological testing of the proposed project infrastructure will be carried out under licence from the National Monuments Service. A report on the testing will be compiled on completion of the work and submitted to the NMS and the Planning Authority. The report will include an archaeological impact assessment. Further mitigation including preservation in situ (avoidance), preservation by record (excavation) and/or buffer zones may be required depending on the results of the testing.

Requirement:

3. *A suitably qualified archaeologist shall be retained to advise on and establish appropriate Exclusion Zones around the external-most elements of vulnerable Heritage Assets (as identified in Chapter 13 of the EIAR or by any subsequent investigations associated with the project).*
 - a. *Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the Department of Housing, Local Government and Heritage and the planning authority.*
 - b. *No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Exclusion Zones.*

Response:

The requirement for buffer or exclusion zones around cultural heritage assets was identified in Chapter 13 of the EIAR to include recorded monument GA030-073— Enclosure located within the Proposed Wind Farm Site. No recorded monuments or other cultural heritage assets are located along the Proposed Grid Connection underground electrical cabling route, on the proposed onsite 220kV substation site or in the area of the proposed interface masts and associated compounds. In this regard the requirement for buffer/exclusion zones along the Proposed Grid Connection was not identified in Chapter 13. As noted in the requirement, however, should vulnerable heritage assets be identified during any investigations associated with the Proposed Project appropriate exclusion zones will then be established where required. Any exclusion zones will be fenced off and appropriately demarcated for the duration of construction works in the vicinity of such assets and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the Department of Housing, Local Government and Heritage and the planning authority. No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within buffer/exclusion zones.

Requirement:

4. *The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 13 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.*

Response:

As detailed in Chapter 13 of the EIAR all mitigation measures set out therein pertaining to archaeological or cultural heritage constraints will be included in the CEMP. The CEMP will include the location of all archaeological and cultural heritage constraints, will identify any potential direct or indirect impacts to same and will detail all mitigation measures to be implemented to ensure the protection of the archaeological and cultural heritage assets during all phases of site preparation and construction activity.

Requirement:

5. *The applicant shall retain the services of a suitably qualified archaeologist to advise on an archaeological mitigation plan for decommissioning of the development, to include mitigation measures for the removal of the turbines and the protection of any archaeological sites and monuments that are in situ at the site. The Decommissioning Plan shall be updated to include the location of any archaeological or cultural heritage constraints as set out in Chapter 13 of the EIAR and by any*

subsequent archaeological investigations associated with the project. It shall clearly describe all identified likely impacts from decommissioning – both direct and indirect- and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during decommissioning works.

Response:

No potential significant effects to the archaeological or cultural heritage resource as a result of the decommissioning phase of the Proposed Project were identified in Chapter 13 of the EIAR as it is considered that the mitigation measures implemented during the construction phase of the project will have dealt with any potential effects. Notwithstanding this, as per point no. 5 of the DAU submission, a suitably qualified archaeologist will be retained to advise on an archaeological mitigation plan for the decommissioning phase of the proposed project. The Decommissioning Plan will include the location of all archaeological and cultural heritage constraints as set out in Chapter 13 and any additional constraints identified as a result of any subsequent archaeological investigations carried out as part of the Proposed Project. The Plan will identify any potential direct and indirect impacts which may arise from the decommissioning phase of the project and set out any mitigation measures deemed necessary to alleviate such potential impacts.

Requirement:

6. *The planning authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.*

Response:

A final report detailing the results of archaeological monitoring of ground works and any archaeological investigations such as archaeological testing and excavation undertaken as part of the Proposed Project will be compiled on completion of the site work. The report will be illustrated with relevant drawings, photographs and plans and will also contain any necessary specialist reports. The final report will be submitted to the National Monuments Service and the planning authority.