

# Appendix 6 Further Information and third party responses to concerns raised regarding the Proposed Lyrenacarriga WF, Counties Cork and Waterford

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# 1 INTRODUCTION

Tobar Archaeological Services Ltd prepared the archaeology and cultural heritage chapter of the EIAR which accompanied the planning application for a proposed wind farm at Lyrenacarriga, Counties Waterford and Cork. This document consists of the responses to a request for Further Information (ABP Ref 309121-21 issued by An Bord Pleanála as well as addressing third party concerns.

Miriam Carroll and Annette Quinn are directors of Tobar Archaeological Services LTD. Miriam and Annette both graduated from University College Cork in 1998 with a Masters degree in Methods and Techniques in Irish Archaeology. Both are licensed by the Department of Housing, Local Government and Heritage to carry out excavations and are members of the Institute of Archaeologists of Ireland. Annette Quinn and Miriam Carroll have been working in the field of archaeology since 1994 and have undertaken numerous projects for both the private and public sectors including excavations, site assessments (EIAR) and surveys. Miriam Carroll and Annette Quinn are directors of Tobar Archaeological Services which has been in operation for 19 years.

## 1.1 An Bord Pleanála request for Further Information

The request for further information largely reflected the concerns of Waterford County Council: *'the potential impact of the proposed development on the setting of historic houses/castles and demesnes along the Blackwater River Valley from Villierstown to Youghal Bridge on both banks of the River'*.

### 1.1.1 Responses

#### 1.1.1.1 Concerns regarding the 5km Distance and Methodology utilised in the Chapter 14 of the EIAR:

Concerns were raised regarding the 5km study area in chapter 14 of the EIAR. Details regarding the methodology utilised are presented in Chapter 14 section 14.2.5. There is no legislative distance or industry standard approach for the assessment of impacts on the setting of cultural heritage assets, more specifically, built heritage. All SMRs, RMPs, RPS, and NIAH structures within 5km of each turbine were included in the EIAR in order to assess potential effects on setting. This is based on professional judgement and experience. The majority of RPS structures consist mainly of items such as houses, castles, gate lodges all of which are located on private land to which the public have limited or no access. Their visitor numbers are confined mainly to the landowners therefore. National Monuments in State Care, however, have public access and have conceivably higher visitor numbers and therefore potential effects on setting on the latter are extended to 10km.

#### 1.1.1.2 Concerns regarding lack of assessment of Built Heritage Protected Structures

The County Development Plan contains a list of Protected Structures to which a number of objectives and policies apply. A protected structure is a structure that a planning authority considers to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view. If you are the owner or occupier of a protected structure, you are legally obliged to prevent it becoming endangered, whether through damage or neglect. Protection is given to these structures under Part IV of the Planning and Development Act 2000 and a structure must be listed on the planning authority's Record of Protected Structures (RPS) to qualify for protected status

under the Act. Each planning authority is obliged to keep a RPS as part of its development plan. There are no instances where the proposed development contravenes the policies of the County Development Plans of Cork or Waterford in that neither a Protected Structure nor its associated curtilage will be impacted. There are no such structures within the footprint of the proposed development site. The policies of the CDP focus on the reuse, regeneration, administration of incentives / grant schemes for improvement to Protected structures, the maintenance and protection of structures listed in the RPS.

Policy AH 5 addresses the protection of the main building and curtilage of Protected Structures from any works which would visually or physically detract from the special character of the main structure or any structures within the curtilage.

There are no instances where either the main building or associated curtilage or structures within the curtilage will be significantly or adversely impacted by the proposed development. The ability to see turbines from a structure does not necessarily indicate a significant or adverse effect. Chapter 14 acknowledges the following regarding structures within 5km of the proposed turbines *'The Zone of Theoretical Visibility suggests that 13-17 turbines may be visible from the majority of locations where RMPs/RPS and NIAH structures are located within 5km from the proposed Turbines. This impact is considered to be slight/moderate. No RPS or NIAH is located in the immediate vicinity of any of the proposed turbines. All built heritage structures are situated at a remove from the proposed turbine locations. In the wider landscape setting, the ZTV (used in the LVIA Chapter 12) shows that there may be varying levels of visibility from the locations of the built heritage structures and some where there is no visibility, in particular from the south'*. Detailed assessment through the use of GIS was undertaken to arrive at this conclusion.

### **1.1.1.3 Concerns regarding the Impact on the setting of Ballynatray House and Demesne and Molana Abbey**

As specified above and in chapter 14 of the EIAR (Section 14.4.5.3), the Zone of Theoretical Visibility (ZTV) model, which was utilised in the LVIA chapter, was also used as part of the Cultural Heritage Assessment to ascertain what, if any, visibility would be possible from various cultural heritage assets. Detailed GIS analysis was undertaken to arrive at a number of conclusions regarding the effects on setting as a result of the proposed turbines. Molana Abbey and Ballynatray House (NIAH ref 22903718) in Ballynatray demesne were located within the 5km assessment zone and therefore included in the analysis. Both are located in an area of the ZTV that has no visibility of the proposed turbines. This is due to topography and the nature of river valleys which tend to be lower in the landscape and heavily tree covered. No impacts on the setting of these structures will occur.

### **1.1.1.4 Concerns regarding Houses, Demesnes and general built heritage along the Blackwater valley from Villierstown to Youghal Bridge**

The majority of this area is located outside the 5km study area as defined in Chapter 14 of the EIAR within which cultural heritage assets are assessed for potential effects on setting. For the avoidance of doubt, however, the concerns regarding built heritage outside this study area is addressed here. The Blackwater River valley from Villierstown to Youghal Bridge is topographically lower than the surrounding landscape and this is the nature of such river valleys. Accordingly, the majority of the area, including the river and lands to the east and west of same are located outside the zone of theoretical visibility. In other words, the zone of theoretical visibility shows that there is no visibility of any turbines from the majority of the areas of concern along the valley. A number of third party submissions also expressed concerns regarding built heritage along the Blackwater Valley and in this regard a number of specific submissions and highlighted structures are addressed here.

A third party submission (Eachtra Archaeological Projects) raised concerns regarding impacts on the unique architectural and archaeological heritage of the Blackwater River Valley. No specific

structures are addressed in the letter, however, an extensive document on the built and natural heritage of the area was attached to the submission. The latter is a detailed document on the Blackwater River Valley which was written for the sole purpose of entering a bid to obtain tentative UNESCO World Heritage Status. At the time of writing this response document, no such status was granted. The letter specifies that the heritage of the area, which '*exists under a wide range of legislative protection must be preserved for current and future generations*'. The document attached to the letter provides an overview of the legislation that protects the heritage of the area. There are no instances where the proposed development contravenes any legislation regarding the archaeological heritage and there are no instances where any works to a monument are proposed. All known archaeological and architectural heritage structures will be preserved for future generations. For the avoidance of doubt, the following structures located along the Blackwater River Valley are discussed in the context of the proposed development and impacts on setting.

**Table 1: Houses, Castles and Demesnes along the Blackwater valley**

Name	NIAH / RMP	ITM E, N	ZTV Result
Strancally House	22903401 and 22903402	E608607, N590580	No Visibility
Strancally Castle Tower House	WA034-034	E610130, N586082	No Visibility
Ballynatray House	22903712	E608051, N583234	No Visibility
Molana Abbey	WA037-011001	E607945, N582893	No Visibility
Templemichael Castle Tower House	WA037-014001	E608026, N582369	No Visibility
Tourin House Demesne and Tourin Castle	2290291 WA029-010	E609303, N596495 E609553, N596518	No Visibility
Dromana House and Dromana Castle	22902918 WA029-021001	E609215, N595127 E609200, N595130	No Visibility
Camphire House and castle.	22819027 WA029-033	E609227, N593003 E609247, N593012	Theoretical visibility of approx. 8 -12 turbines
17 <sup>th</sup> century house at Headborough	WA029-041	E607636, N591580	Theoretical visibility of 4 to 8 turbines.

D'Loughtane House	WA037-015	E610388, N582843	Theoretical visibility of 12 to 17 turbines.
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### **Camphire House and castle**

Views from Camphire House are largely restricted due to the dense vegetation and woodland surrounding the site. Given that this location is on the edge of the ZTV (which means that limited extents of the turbines will be seen even were open, unobstructed views available), combined with the presence of a mature deciduous treeline upon the ridgeline, there is likely limited to no views of the proposed turbines. In this regard visual effects on setting will be imperceptible. This is also assessed in Section 1.2.2 of the RFI LVIA Report and on Figures 1-3 to 1-6 of that same document.

### **17th century house at Headborough**

The 17<sup>th</sup> Century House at Headborough is surrounded by mature woodland. Mature woodland present in the grounds / demesne of the house screen the proposed development from view. This is similarly the case with views from the house itself, which similar to Camphire House above is just within the ZTV and is surrounded by mature trees. There will be limited to no views of the proposed turbines. In this regard visual effects on setting will be imperceptible. This is also assessed in Section 1.2.2 the RFI LVIA Report and on Figures 1-3 to 1-6 of that same document.

### **D'Loughtane House**

Since the ZTV shows theoretical visibility of 12 -17 turbines a photomontage was undertaken from the house in the direction of the proposed development. The results show that 11 turbines will be partially visible (approximately from mid shaft to blade tip) with only the blade tips of the remainder visible. At the distance of 6.4km to the nearest turbine (T6), this effect is considered to be not significant (An effect which causes noticeable changes in the character of the environment but without significant consequences., EPA Guidelines 2022). The photomontage is presented in the Appendix 1 of the RFI LVIA Report, PM23 and further addressed in the RFI LVIA Report document at Section 1.2.2.2.

The general findings of the EIAR in terms of impacts on architectural heritage structures (assessed within 5km of the nearest turbine) also concluded that all built heritage structures are situated at a remove from the proposed turbine locations. In the wider landscape setting, the ZTV showed varying levels of visibility from the locations of the built heritage structures and some where there is no visibility, in particular from the south. The ZTV is based on the worst-case scenario as it does not take natural screening or vegetation into account. In reality, the latter is likely to minimise any potential effects on setting. The residual impacts, where an impact has been identified are considered to be slight in general. No adverse or significant impacts were identified as part of the EIAR conclusions or as part of the further information provided above which focus on specific structures.

## **1.1.1.5 Concerns regarding Houses, Demesnes and general built heritage along the Bride river valley from Tallow to the confluence with the Blackwater**

The Bride river valley mainly falls within the ZTV, in particular, towards the western end. Large portions of the eastern end of the river valley surrounding Snugborough fall outside the ZTV. The following built heritage structures are addressed in terms of potential effects on setting.

**Table 2: Houses, Castles and Demesnes along the Bride river valley**

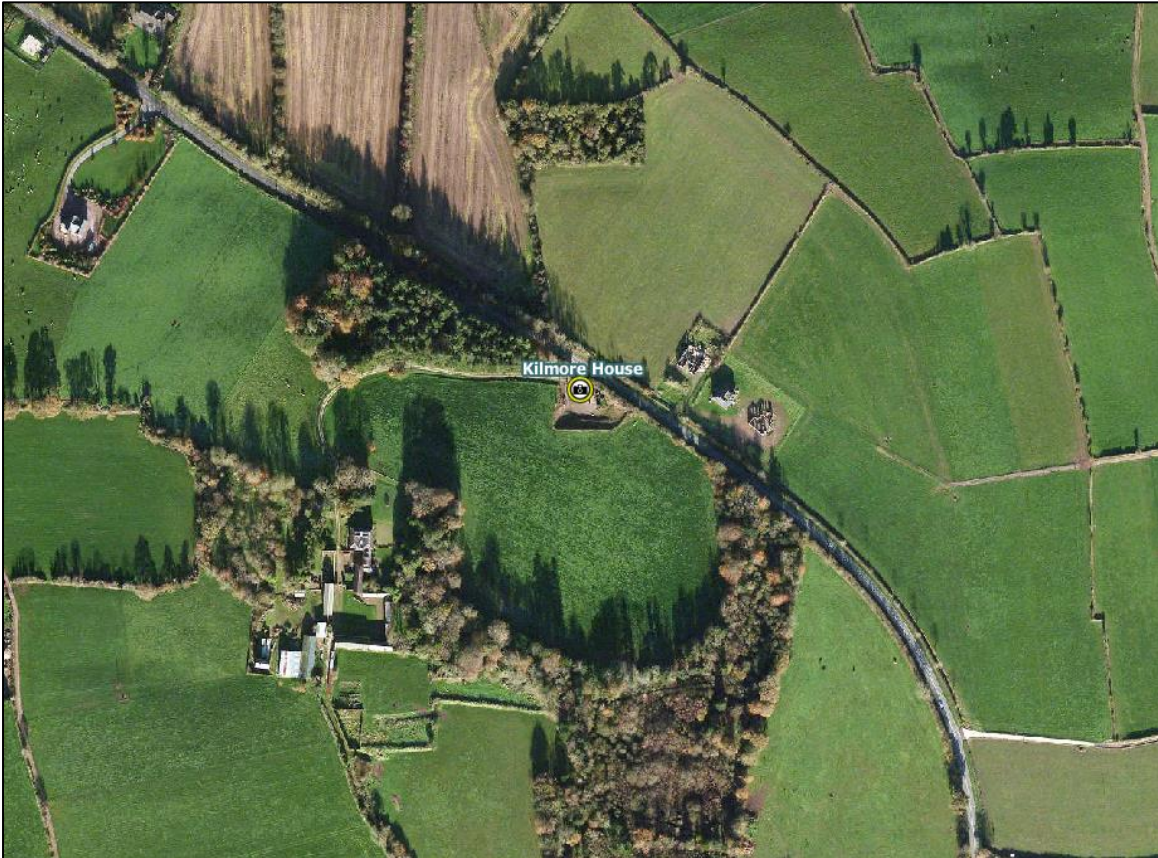
Name	NIAH / RMP	ITM E, N	ZTV Result	Further Assessment Required
Lisfinny House / Demesne and castle	NIAH 22902807 RMP WA028-013	E599155, N594596	Theoretical visibility of 12 -17 turbines	See Photomontage 50
Kilmore House	NIAH 22902802	E601001, N592192	Theoretical visibility of between 8 and 12 turbines.	See below
Sapperton House	NIAH 22902901	E604708, N593151	No Visibility	No
Ballynaraha Castle	RMP WA029-028	E605950, N594133	Theoretically 12 – 17 turbines will be visible.	See Photomontage M24

**Lisfinny House / Demesne and castle**

Since the ZTV shows theoretical visibility of between 12 and 17 turbines, a photomontage was prepared in order to ascertain what if any visibility is possible and the degree of visibility from the monument. The Photomontage (PM 26) is presented in the Appendix 1 of the RFI LVIA Report and shows that turbines 1 -10 will be barely discernible with the remainder of the turbines visible from approximately mid shaft to blade tip. At the distance of 6.2km to the nearest turbine (T12), the overall significance of effects are considered to be not significant (An effect which causes noticeable changes in the character of the environment but without significant consequences). A change to the views from the monument are acknowledged but without significant or adverse consequences.

**Kilmore House**

The site of the house itself is not accessible to the public and access could not be obtained during the site visit. Similar to the above, this site is located on the edge of the ZTV and therefore visibility is limited even where there is open visibility in the direction of the Proposed Development. **Error! Reference source not found.** below is an aerial view of Kilmore House, showing a large area of woodland surrounding the site. With the direction of the Proposed Development to the south, it is clear from the aerial imagery that there will be limited to no visibility of the Proposed Development from this site, as a result of screening from the vegetation (deciduous woodland) and the fact that there is already likely limited visibility indicated on the ZTV. The overall effects will therefore be imperceptible. This structure is also discussed further in Section 1.2.2 of the RFI LVIA Report.



*Plate 1-1: Aerial View of Kilmore House (also presented in the RFI LVIA Report)*

### **Ballynaraha Castle**

Since the ZTV shows theoretical visibility of between 12 and 17 turbines, a photomontage was prepared in order to ascertain what, if any, visibility is possible and the degree of visibility from the monument. The Photomontage is presented in Appendix 1 of the RFI LVIA Report (PM 24) and addressed in Section 1.2.2.2 of the RFI LVIA Report. The photomontage shows that turbine 6 will be visible at a distance of 6.7km. At the distance of 6.7km to the nearest turbine (T1), the overall significance of effects are considered to be imperceptible to not significant since a large tract of woodland and hedgerow has effectively screened the remainder of the turbines.

## **1.2 Local Authority Submissions**

### **1.2.1 Cork County Council**

Cork County Council's Archaeologist assessed Chapter 14 of the EIAR with regard to archaeology and the cultural heritage. The Planning Authority is satisfied with the report and the mitigation measures outlined in Section 14.4.3.3. No further information is required in this regard.

### **1.2.2 Waterford County Council**

Waterford County Council's Conservation Officer raised a number of concerns regarding the Built Heritage including:



- The visual impact on Built Heritage along the Blackwater and Bride Rivers (Blackwater, and the section of the Bride from Tallow to the confluence with the Blackwater) and their settings, including Molana Abbey and Ballynatray House
- The impact on bridges, boundaries on the haul routes to the site and access roads (With regard to the haul routes mitigation measures regarding the temporary protection or stabilising works to ensure the protection of the Built Heritage, in particular bridges along the Regional and Local Roads, should be considered and Road Designs comments are noted also).

The comments by the Conservation Officer raised concerns regarding the distance of 5km within which built heritage and archaeology (RPS, NIAH and RMP/SMR) were assessed. Concerns were also raised regarding the visual impact on Ballynatray House/Molana Abbey.

In summary WCC have concerns regarding *'the adequacy and completeness of the assessment of the potential impact of the proposed development on the character and assessment of the Built Heritage in the wider area and acknowledges that while some assessment has taken place within 5km buffer of the development there are significant Protected Structures including structures with associated Demesne which may be impacted upon and the submitted details is not present or clear'*.

## 1.3 Third Party Concerns

### 1.3.1 Johnny and Mary Mills

Concerns were raised (Johnny and Mary Mills) regarding several archaeological findings in the area and that the construction of the windfarm will **damage the ancient artefacts and prevent them being found in the future.**

**Response:** Potential damage to 'ancient artefacts' was already addressed in the EIAR and an extract from same is as follows: *'The construction stage effects on archaeological heritage were addressed and assessed in detail in Section 14.4.3 of Chapter 14 where direct impact (physical impact) on monuments and sites are addressed. The construction phase of the development consists largely of earthmoving activities such as topsoil removal. The potential impacts on the known and potential archaeological, architectural and cultural heritage of the area are outlined with detailed mitigation measures. The impacts are described according to each element of the Proposed Development, turbines, grid connection, delivery routes etc. These mitigation measures are reiterated here again.'*

*There will be no direct effects to the known cultural heritage resource as a result of the construction activities. Three recorded monuments are located within the EIAR site boundary and in order to protect these monuments or sites of the monuments from accidental damage a protective buffer zone around the recorded monuments will be established'.*

In terms of potential effects to 'ancient artefacts' these are also directly addressed in Chapter 14 Section 14.4.3.3 where it highlights that *'the potential for the development area to contain as yet unrecorded sub-surface sites and artefacts is likely to be low within the forested section of land and medium within the green-field sections of the proposed development'*. It was specified in chapter 14 that the excavation of topsoil for the new turbine bases, hardstands, and sections of roads and cable route where they are located on undisturbed ground and green fields may impact on any new sub-surface sites, if present. The section of cable route adjacent to the stream is also regarded as an area of archaeological potential given the preference for such locations for monuments such as fulachta fiadh. Detailed mitigation measures were provided and described in the EIAR and will be implemented during construction in order to avoid damaging any sites or artefacts. The mitigation

measures I are described in the EIAR and the following which is a direct extract from the EIAR, chapter 14.

*'Pre-development licensed archaeological testing of the following:*

- *Proposed cable route in greenfield areas*
- *Turbines/Hardstands for T3, T4, T6, T7, T14, T16 and T17*
- *New roads where they are proposed in green fields*
- *Proposed new road along haul route*

*Archaeological monitoring (under licence from the National Monuments Service) of any further geotechnical / engineering trial pits or investigations and a report detailing the results of same.*

*Archaeological monitoring under licence of all ground works during construction. The National Monuments Service will be informed of such findings to discuss how best to proceed. If archaeological finds, features or deposits are uncovered during archaeological monitoring, the developer will be prepared to provide resources for the resolution of such features whether by preservation by record (excavation) or preservation in situ (avoidance). Once the project is completed, a report on the results of the monitoring will be compiled and submitted to the relevant authorities'.*

### **1.3.2 Maria Conran**

Concerns were raised regarding Kilcalf School House, the gates and railings of which are a protected structure (Ref WA750774) and listed in the NIAH. As this structure falls within the 5km study area it is included in the assessment in Chapter 14 of the EIAR in Section 14.3.3.2.

The ZTV used in the LVIA chapter was also used in Chapter 14 and in Section 14.4.5.3 the following was concluded: *'The Zone of Theoretical Visibility suggests that 13-17 turbines may be visible from the majority of locations where RMPs/RPS and NIAH structures are located within 5km from the proposed Turbines. This impact is considered to be slight/moderate. No RPS or NIAH is located in the immediate vicinity of any of the proposed turbines. All built heritage structures are situated at a remove from the proposed turbine locations. In the wider landscape setting, the ZTV (used in the LVIA Chapter 12) shows that there may be varying levels of visibility from the locations of the built heritage structures and some where there is no visibility, in particular from the south'.*

In summary, it was acknowledged in Chapter 14 that the potential effects on such structures was slight/moderate, slight being defined in the EPA Guidelines (2022) as *'An effect which causes noticeable changes in the character of the environment without affecting its sensitivities'* and a moderate effect as *'An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends'*.

No Very significant or profound effects will occur since these effects would result in either *'An effect which, by its character, magnitude, duration or intensity, significantly alters most of a sensitive aspect of the environment'* or in the case of a Profound Effect where it is defined as *'An effect which obliterates sensitive characteristics'*.

### **1.3.3 Maurice Hennessey**

A number of concerns were raised and are addressed separately below:

**2.1: The third party raised concerns over the limitations regarding access to the recorded monuments within the EIAR boundary and that they were not accessed due to dense overgrowth and the uncertainty regarding their location as a result.**

**Response:** Section 3.6.2 of the EPA Guidelines requires that the EIAR assessment take cognisance of any limitations when establishing the baseline data and existing environment within which, in the case of Chapter 14, cultural heritage assets may occur. The EPA guidelines state the importance of drawing attention within the EIAR to limitations about factors that may affect the reliability of baseline data. These can include the availability, completeness, accuracy, age, accessibility and compatibility of data. These monuments are described in Section 14.3.2.2.1 of the EIAR where the original Archaeological Survey of Ireland descriptions were also provided. There is no doubt as to the location of the monuments having used previous survey descriptions as well as historic mapping. The limitation lies solely in accessibility. Regardless of the accessibility or otherwise, the three recorded monuments are protected under National Monuments legislation and protective buffer zones around same will be implemented as appropriate mitigation accordingly. An extract from Chapter 14 Section 14.4.3.2 is as follows: *'They (the monuments) are situated away from the proposed infrastructure (including hardstands, turbine bases, construction compounds, borrow pits, new roads and the proposed substation). The monuments have been designed out of the proposed site layout and therefore they have been mitigated by avoidance. No construction effects will occur in this regard. Protective buffer zones around each monument is required as mitigation however and this has been incorporated into the Construction and Environmental Management Plan (CEMP). (The statutory SMR zones surrounding the monuments will act as buffer zones).*

**Section 2.2 and 2.3:** Code of Practice between Coillte and the Minister for the Environment and Local Government

**Response:** The Coillte code of practice sets out guidelines for afforestation and clearance in terms of impacts on archaeology. The aim of the archaeological assessment undertaken as part of the EIAR is to establish the current baseline data available and to assess the monuments in their current setting (i.e. the Existing Environment). Any requirement for the principles of the Code of Practice to be implemented precedes that of the proposed development. The third party asserts that the monuments are unidentified. The EIAR states that the monuments were inaccessible and this was the baseline environment required to be described as part of the assessment. Any potential inaccessibility issues pre-date the assessment. Mitigation measures in the form of buffer zones will be implemented prior to construction to protect the areas of the monuments. The monuments are designed out of the proposed development and any requirement for clear-felling outside the proposed development is a matter for Coillte and such works would fall under the Coillte Code of Practice therefore. The code of practice will ensure the protection of the monuments however.

**Section 2.4: Raised concerns over the area of Turbine 8 and borrow pit west of T12 and the lack of a statement from the author of Chapter 14 that these areas did not contain above ground archaeological features:**

**Response:** Section 14.3.2.5 of Chapter 14 states that no new above ground features or sites were encountered within any of the areas proposed for development including the area of the proposed turbines, roads and other infrastructure. This means that no new archaeological sites or monuments were recorded during fieldwork. The area of Turbine 8 was visited on the 26<sup>th</sup> July 2022. While this area is under coniferous forestry it was accessible on foot. No above-ground archaeological sites or monuments were noted during the site walk-over. Additional photos have been provided here.



*Plate 1-2: Area of proposed turbine 8 looking south.*



*Plate 1-3: Area of proposed turbine 8 looking East.*



**Plate 1-4: Borrow pit west of T12 looking East.**

**Section 2.5: Destruction of an old laneway / access to Turbine 16.**

**Response:** As described in Section 14.3.3.4.1 of the EIAR, a small historic settlement is located outside the EIAR boundary to the north of T16. This will be preserved in situ resulting in no direct construction effects. Part of the associated historic road (southwestern section) will be utilised as the new access road to T16 and therefore direct impacts are anticipated and acknowledged. The laneway is a non-statutory item of local cultural heritage and accordingly mitigation measures are proposed. A photographic and descriptive record of the boundary removal will be undertaken by the monitoring archaeologist in advance of groundworks associated with T16.

**Section 2.6: Potential Bronze Age monuments along the proposed collector network cable route.**

**Response:** This section of the third party submission is an extract from Chapter 14 which states that 'It is proposed to connect the two turbine clusters via an underground cable located within existing agricultural land and within the public road corridor. One watercourse (stream) was encountered where the cable route crosses the Rearour North and Breeda townland boundary. This stream was accessible, shallow and clear on the day of survey and no archaeological features were noted. A rushy field in pasture to the east of the river may be regarded as an area of archaeological potential. Fulachta fia and burnt mounds, low visibility monuments, are often found in such locations adjacent to a water source. This monument type may span from the Bronze Age (c. 2400-500 BC) to the early medieval period (5th - 12th century AD). They consist of a circular or irregularly shaped mound of material consisting of burnt stones, ash and charcoal and often have no surface evidence of a trough

or depression. Levelled examples can appear as a spread containing burnt stones. Impacts relating to sub-surface archaeology is addressed in Section **Error! Reference source not found.** of the EIAR'.

It is a requirement of the assessment to highlight areas of archaeological potential so that they can effectively be mitigated either at the pre-construction or construction stage. In this regard the following will be implemented

Pre-development licensed archaeological testing of the following:

- Proposed cable route in greenfield areas
- Turbines/Hardstands for T3, T4, T6, T7, T14, T16 and T17
- New roads where they are proposed in green fields
- Proposed new road along haul route

Archaeological monitoring (under licence from the National Monuments Service) of any further geotechnical / engineering trial pits or investigations and a report detailing the results of same.

Licensed Archaeological monitoring will be undertaken of all ground works during construction. The National Monuments Service will be informed of such findings to discuss how best to proceed. If archaeological finds, features or deposits are uncovered during archaeological monitoring, the developer will be prepared to provide resources for the resolution of such features whether by preservation by record (excavation) or preservation in situ (avoidance). Once the project is completed, a report on the results of the monitoring will be compiled and submitted to the relevant authorities.

## Section 2.7 – 2.9

**Response:** These sections are merely extracts from the EIAR Chapter 14 that serve to highlight areas of archaeological potential, monuments within the 5km and 10km study area and repeats the findings of the EIAR that theoretically 13-17 turbines may be visible from many areas within 5km in accordance with the results of the ZTV. This third party submission also states that a Looped Bronze Spearhead was found at Kilwaterymountain. Again, this is an extract from Section 14.3.2.4 of Chapter 14 where the author has assessed the artefact bearing potential of the surrounding environment of the proposed windfarm.

## Section 2.10 Granada Convention for the Protection of the Architectural Heritage.

**Response:** This section of the third party asserts that the Granada Convention has not be complied with in light of the apparent lack of 'identification' of the recorded monuments within the EIAR boundary and the Coillte Code of practice not being complied with. The Granada Convention reflects the obligations of each European member state to maintain an inventory of structures of architectural heritage merit. Irelands obligations were fulfilled by compiling the National Inventory of Architectural Heritage (NIAH) by the now Department of Housing, Local Government and Heritage. This architectural inventory has no bearing on the recorded monuments within the EIAR boundary or indeed the Coillte code of practice.

There is an apparent misunderstanding by the third party as to the purpose of the Granada Convention and the responsibilities in maintaining the list of structures. The responsibility for maintaining the list of Architectural Heritage Inventory lies with the State through the aforementioned government department.

The Department State that '*The National Inventory of Architectural Heritage (NIAH) is a state initiative under the administration of the Department of Housing, Local Government and Heritage and*

established on a statutory basis under the provisions of the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act 1999. The purpose of the NIAH is to identify, record, and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently as an aid in the protection and conservation of the built heritage. NIAH surveys provide the basis for the recommendations of the Minister for Housing, Local Government and Heritage to the planning authorities for the inclusion of particular structures in their Record of Protected Structures (RPS)' (<https://www.buildingsofireland.ie/about-us/>).

It must be reiterated again that the monuments referred to in the third party submission in Section 2.1 above fall under the National Monuments legislation by way of inclusion in the Sites and Monuments Record and the Record of Monuments and Places and has no association with the NIAH formulated under Article 2 of the Granada Convention. Furthermore, the monuments are not 'unidentified' as asserted by the third party but were merely not accessible due to dense overgrowth. The Coillte Code of Practice is between Coillte and the now Department of Housing, Local Government and Heritage, the purpose of which is to provide a framework within existing legislation and policies to enable Coillte to proceed with the management of its forests in a manner that ensures the safeguarding of the State's archaeological heritage. Any forest management policies within the proposed development site pre-date the assessment therefore. The Forestry and Archaeology Guidelines July 2016 also seek to protect archaeological monuments within areas of forest activities. Any future forest activities would also fall under the Code of Practise and the Forestry and Archaeology Guidelines (2016).

### **Section 2.11 Contravention of Cork County Development Plan HE3-6**

**Response:** Chapter 14 of the EIAR Section 14.1.3.1.5 details the CDP policy HE 3-6: Archaeology and Infrastructure Schemes which states the following '*Have regard to archaeological concerns when considering proposed service schemes (including electricity, sewerage, telecommunications, water supply) and proposed roadwork's (both realignments and new roads) located in close proximity to Recorded Monuments and Places and their known archaeological monuments*'.

The policy merely states that regard should be had to archaeological concerns when considering proposed developments. The assessment process (Chapter 14 of the EIAR) has presented all available baseline data and a detailed suite of mitigation measures where potential impacts may occur. Furthermore, Cork County Council Archaeologist assessed Chapter 14 of the EIAR with regard to archaeology and the cultural heritage. The Planning Authority is satisfied with the report and the mitigation measures outlined in 14.4.3.3. No further information is required in this regard by Cork County Council.

### **Section 2.12 Contravention of Cork County Development Plan HE 4-2 (f)**

**Response:** Section 14.1.3.1.6 of Chapter 14 provides details regarding HE 4-1: Record of Protected Structures policies. Cork County Council's Archaeologist assessed Chapter 14 of the EIAR with regard to archaeology and the cultural heritage. The Planning Authority is satisfied with the report and the mitigation measures outlined in 14.4.3.3. No further information is required in this regard by Cork County Council.

### **Section 12.13 Contravention of Waterford County Development Plan Objective AH3.**

**Response:** Waterford County Council have requested further information as well as an Bord Pleanála regarding visual impacts on Built Heritage. All concerns are addressed in Section 1.2.1 above.

## **1.3.4 Niall Slevin**

This third party submission raises concerns regarding 'The Thatch Cottage' at Glennaglogh. There is one thatch house listed in the Record of Protected Structures WA750529 in the County Waterford Development plan as being located in Glennaglogh. No locational information is provided in the list



of protected structures such as a coordinate. A digital dataset with coordinates of protected structures was requested from the Conservation Officer by email in 2020 to which no response was received. Resultingly the Record of Protected structures could not be plotted on the project base mapping since no coordinates are provided in the County Development Plan.

An Eircode is provided with the third party submission and in this regard according to the ZTV, 13 to 17 turbines may theoretically be visible from this location as acknowledged by the EIAR Chapter 14. No direct effects to the protected structures will occur however. Visual effects on setting are considered to be slight/moderate as stated in Section 14.4.5.3 of Chapter 14. An extract from the EIAR states the following *'The Zone of Theoretical Visibility suggests that 13-17 turbines may be visible from the majority of locations where RMPs/RPS and NIAH structures are located within 5km from the proposed Turbines. This impact is considered to be slight/moderate. No RPS or NIAH is located in the immediate vicinity of any of the proposed turbines. All built heritage structures are situated at a remove from the proposed turbine locations. In the wider landscape setting, the ZTV (used in the LVIA Chapter 12) shows that there may be varying levels of visibility from the locations of the built heritage structures and some where there is no visibility, in particular from the south.*

### 1.3.5 Paddy Massey

**Response:** It is considered that all concerns regarding built heritage along the Blackwater Valley in terms of impacts on visual setting have been addressed and can be referred to in Section 1.2.1 above. As it stands, the robust document compiled by Dr. Olley provides an extensive overview of the Munster Blackwater Valleys natural and cultural heritage in an attempt to gain tentative World Heritage Status for the region. Currently the baseline data provided in Chapter 14 of the EIAR is such that the Blackwater Valley is not included in the current UNESCO World Heritage tentative list.

(<https://whc.unesco.org/en/statesparties/ie>).

## 2 CONCLUSION

This document comprises a response to a Request for Further Information issued by An Bord Pleanála (Ref. 309121-21) regarding the proposed Lyrenacarriga Wind Farm, Counties Cork and Waterford. It also addresses a number of third party submissions, many of which raised concerns regarding the assessment of potential impacts to the built heritage of the surrounding area. In response to the RFI and the concerns raised in some submissions, photomontages were carried out from a number of structures and are presented in the RFI LVIA Report which should be read in conjunction with this document. It is considered that all concerns regarding the assessment process and the results of same as reached in Chapter 14 of the EIAR are addressed here and that the mitigation measures outlined in the Chapter are appropriate for the amelioration of any potential impacts identified.