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ARCHAEOLOGY | CONSERVATION | HERITAGE | PLANNING

Cultural Heritage Impact Assessment

Long Duration Battery Storage, Ballynahone, Trillick, County Donegal



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1. Introduction

John Cronin & Associates have been commissioned by **Fehily Timoney and Company** to prepare a cultural heritage impact assessment of a proposed Long Duration Battery Storage at Ballynahone, Trillick, County Donegal (**Figure 1**).

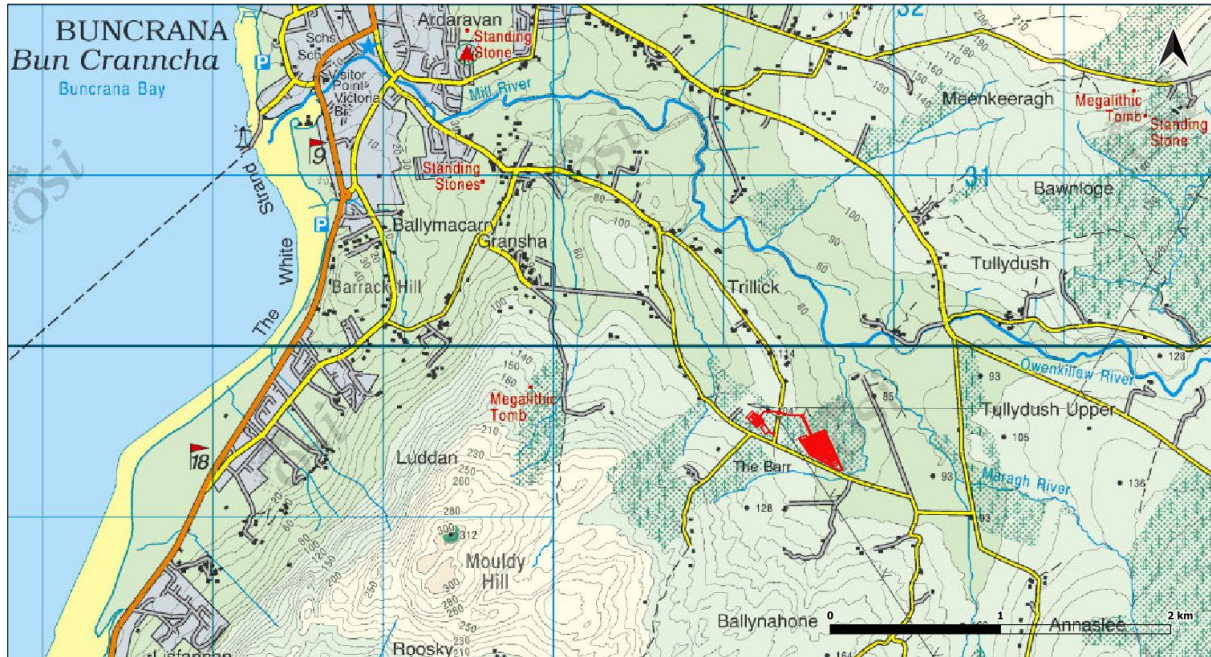


Figure 1: Location of subject site (red), southeast of Buncrana town, Inishowen Peninsula, County Donegal (Image Source: Tailte Éireann, National Monuments Service, Historic Environment Viewer)

2. Methodology

Desk based assessment

A desktop study assessment has been carried out to identify all known and recorded cultural heritage receptors within a study area comprising the subject site at Ballynahone townland and a 1km radius surrounding same.

The principal sources reviewed for this assessment of the known archaeological resource are the Sites and Monuments Record (SMR) and the Record of Monuments and Places (RMP), with the latter afforded formal statutory protection (see Section 3 Legal & Policy Framework).

The Archaeological Survey of Ireland (ASI) continues to record, update, and add entries to the SMR which is accessible via an online map-based database 'Historic Environment Viewer'¹ (HEV). In addition, the locational points and metadata for the National Inventory of Architectural Heritage (NIAH) is also accessible via the HEV.

In addition, the following sources were consulted as part of the desktop study:

- *Cartographic Sources* - The detail on cartographic sources can indicate past settlement and land use patterns in recent centuries and can also highlight the impact of modern developments and agricultural practices. This information can aid in the identification of the location and extent of unrecorded, or partially levelled, features of archaeological or architectural heritage interest. The cartographic sources examined for the study area include the First edition of the 6-inch Ordnance Survey (OS) maps (surveyed and published in the 1830s-40s), the 25-inch OS maps (surveyed and published 1887-1913) and the Cassini 6-inch maps (c.1940).
- *Aerial photography* - In parallel with the cartographic study, a review publicly-accessible aerial photographic sources from the Ordnance Survey, Google and Bing Maps was undertaken.
- *Digital Terrain Model (DTM) Data* - A review of available project photogrammetric DTM data was undertaken together with application of hillshade analysis. DTM models together with hill-shading analysis can aid visual identification of discreet and subtle surface expression of potential archaeological features. This is especially useful for assessment of currently forested terrain, such as that at the subject site.
- *Development Plans* - The local authority development plan relevant to the study area was consulted as part of this assessment. These plans outline the local authorities' policies for the conservation of the archaeological and architectural heritage resource and include the Record of Protected Structures (RPS) and any designated Architectural Conservation Areas (ACAs). The relevant development plan for the study area is the *County Donegal Development Plan 2024-2030*.

¹ Historic Environment Viewer (HEV) is available at: <https://heritagedata.maps.arcgis.com/apps/webappviewer/index.html?id=0c9eb9575b544081b0d296436d8f60f8> [Accessed 28.02.2024]

- *Database of Irish Excavation Reports* - The Database of Irish Excavation Reports contains summary accounts of all licensed archaeological excavations carried out in Ireland from 1960s to present.
- *Topographical Files of National Museum of Ireland* - These files comprise paper and digital records of known information on Irish artefacts, including their discovery locations. The file archive is stored in the museum premises in Kildare Street, Dublin and was inspected as part of the assessment on 29th January 2024.
- *Placenames Database of Ireland* - The Placenames Branch (Department of Culture, Heritage and the Gaeltacht) provides a comprehensive management system for data, archival records and place name research conducted by the State. Its primary function is to undertake research in order to establish the correct Irish language forms of the place names of Ireland and to publish them on a public website (www.logainm.ie).
- *UNESCO World Heritage Sites and Tentative List* - UNESCO seeks to encourage the identification, protection and preservation of cultural and natural heritage around the world considered to be of outstanding value to humanity. There are two world heritage sites in Ireland and a number of other significant sites are included in a Tentative List (2022) that has been put forward by Ireland for inclusion.

Site based assessment

A site inspection of the proposed development lands was undertaken on 26th January 2024. All areas were not accessible due to thick vegetation and commercial forestry, as well as high voltage electrical towers and overhead lines. The site was assessed in terms of landscape, land use, vegetation cover, and presence or lack of both known and potential archaeological sites. Weather conditions at the time of inspection were fair and this provided good landscape visibility. A photographic record of the site inspection was compiled, and extracts are presented in the **Appendix 2** to this report.

Impact assessment

The measurement of impact on the cultural heritage resource is based on an assessment of both the type (direct/indirect/no predicted effect), magnitude of the impact (graded from high to negligible) and value/sensitivity (graded from Very High to Negligible) of the heritage receptor.

The assessment of impact can be described as Profound, Very Significant, Significant, Moderate, Slight, Not Significant or Imperceptible (see **Table 1** and **Table 2**).

Table 1: Assessing impact on the Cultural Heritage Resource

Significance of Effects (after EPA Guidelines 2022)	
Imperceptible	An effect capable of measurement but without significant consequences. Can directly or indirectly affect the cultural heritage resource but is without noticeable consequences.
Not Significant	An effect which causes noticeable changes in the character of the environment but without significant consequences. Can directly or indirectly affect the cultural heritage resource.

Significance of Effects (after EPA Guidelines 2022)	
Slight	An effect which causes noticeable changes in the character of the environment but without affecting its sensitivities. Can directly or indirectly affect the cultural heritage resource.
Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends. Directly or indirectly affects the cultural heritage receptor but not such where the integrity of the resource is compromised.
Significant	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment. Directly or indirectly affects the cultural heritage receptor in part, with partial loss of integrity, character and data.
Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment. Directly or indirectly affects the cultural heritage receptor for the most part, with loss of integrity, character and data.
Profound	An effect which obliterates sensitive characteristics. Completely and irreversibly affects the cultural heritage receptor with total loss of integrity, character and data.

Table 2: Assessing Significance of Effect for the Cultural Heritage Resource

Significance of Effects Matrix (per EPA Guidelines 2022)					
Magnitude of Impact	High	Not Significant / Slight	Moderate / Significant	Significant / Very Significant	Very Significant / Profound
	Medium	Not Significant	Slight	Moderate / Significant	Significant / Very Significant
	Low	Not Significant / Imperceptible	Slight / Not Significant	Slight	Moderate
	Negligible	Imperceptible	Not Significant / Imperceptible	Not Significant / Slight	Slight
		Negligible	Low	Medium	High/Very High
Value/Sensitivity of the Cultural Heritage Asset					

3. Context

Location

The subject site consists of a proposed addition of long duration battery storage to the area southeast of the existing Trillick ESB 110kV sub-station, within the townland of Ballynahone, County Donegal (**Figure 2**). The soil profiles of this area consist of peat (Irish Soil Information System (Teagasc)).

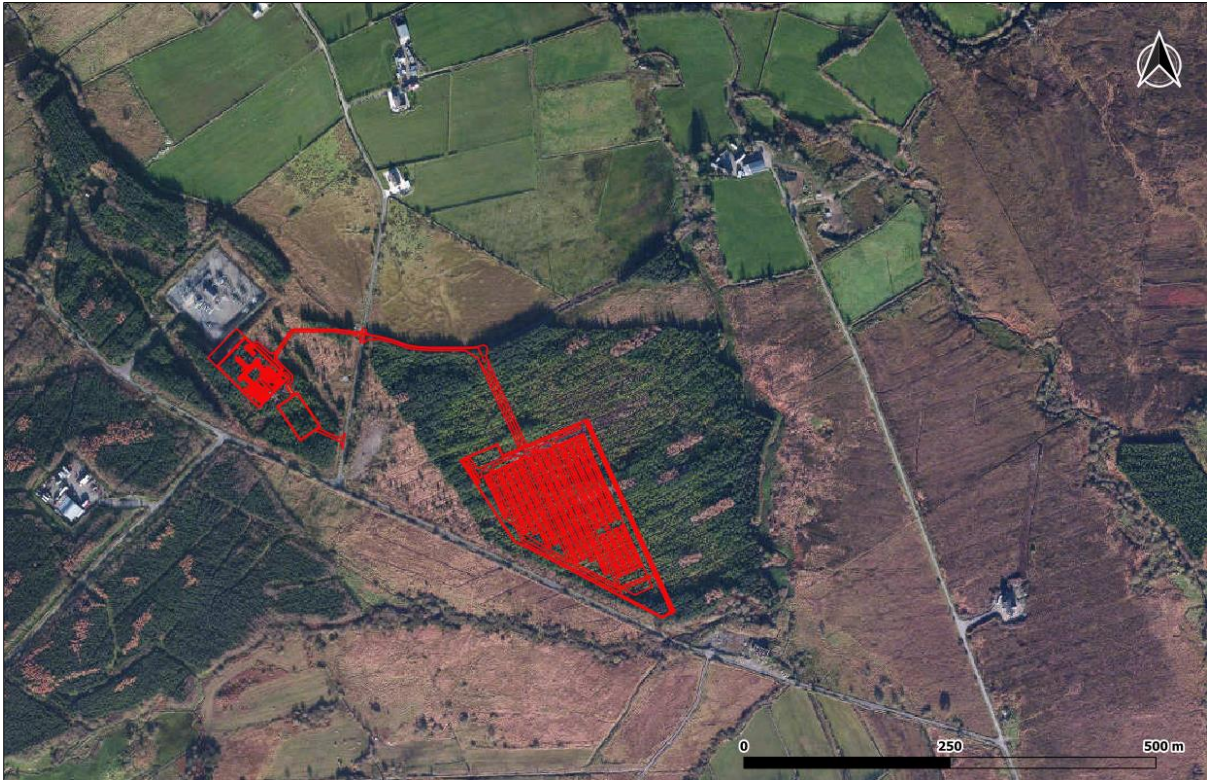


Figure 2: Location of proposed Long Duration Battery Storage at existing Trillick 110kV sub-station, County Donegal (red) (Image Source: Tailte Éireann, National Monuments Service, Historic Environment Viewer)

Legal & Policy Framework

The management and protection of cultural heritage in Ireland is achieved through a framework of national laws and policies which are in accordance with the provisions of the Valetta Treaty (1995) (formally the *European Convention on the Protection of the Archaeological Heritage, 1992*) ratified by Ireland in 1997; the *European Convention on the Protection of Architectural Heritage* (Granada Convention, 1985), ratified by Ireland in 1997; and the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage, 2003*, ratified by Ireland in 2015.

- The location of World Heritage Sites (Ireland) and the current Tentative List of World Heritage Sites (2022) submitted by the Irish State to UNESCO were reviewed, and none are located within the subject site or surrounding in the areas.

The national legal statutes and guidelines relevant to this assessment include:

- Historic and Archaeological Heritage and Miscellaneous Provisions Act (2023)
- National Monuments Act 1930-2014 (as amended);
- Heritage Act 1995 (as amended);

- National Cultural Institutions Act 1997 (as amended);
- Planning and Development Act 2000 (as amended);
- *Architectural Heritage Protection: Guidelines for Planning Authorities*, Department of Arts, Heritage, and the Gaeltacht (2011); and
- *Framework and Principles for the Protection of the Archaeological Heritage*, Department of Arts, Heritage, Gaeltacht and the Islands, 1999.

Archaeological heritage

The administration of national policy in relation to archaeological heritage management is the responsibility of the National Monuments Service (NMS) which is currently based in the Department of Housing, Local Government and Heritage. The *Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023* was signed into law on October 13th, 2023. The Department of Housing, Local Government and Heritage published an online guidance note² in relation to this Act in November 2023 which provides an overview of its current status:

While the Act is now law most of its provisions will not enter into force until the Minister of Housing, Local Government and Heritage has made one or more "Commencement Orders". This means that section 7 of the Act (which provides for the repeal of the National Monuments Acts 1930 to 2014 and related legislation) has not entered into force. Accordingly, the National Monuments Acts 1930 to 2014 and other legislation which section 7 of the Act will, when it comes into force, repeal, remain fully in force as they stood on 13th October and will continue to do so for the time being. The Act contains transitional provisions which will, if necessary, enable certain aspects of the existing National Monuments Acts 1930 to 2014 to continue in operation notwithstanding their repeal post-commencement of the Act while successor provisions are being brought fully into operation. This includes provisions enabling the Record of Monuments and Places to continue to have effect pending the establishment of a new Register of Monuments.

The National Monuments Acts 1930 (as amended), the Heritage Act 1995 (as amended) and relevant provisions of the National Cultural Institutions Act 1997, therefore, remain the primary means of ensuring the satisfactory protection of archaeological remains. There are a number of mechanisms under the National Monuments Acts that are applied to secure the protection of archaeological monuments. These include the designation of National Monument status, the Register of Historic Monuments (RHM), the Record of Monuments and Places (RMP) and the Sites and Monuments Record (SMR) as well as the placing of Preservation Orders and Temporary Preservation Orders on endangered sites.

A National Monument is described as 'a monument or the remains of a monument, the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic or archaeological interest attaching thereto' (Section 2, National Monument Act, 1930). The Record of Monuments and Places was established under Section 12(1) of the National Monuments (Amendment) Act, 1994 and was based on the earlier Sites and Monuments Record and Register of Historic Monuments. These records comprise lists and maps of all known archaeological monuments and places for each county in the state. The National Monuments Service maintains an online Historic Environment Viewer which comprises an interactive map/search facility that provide access to current records stored on its national database of sites and monuments. The Viewer includes designated areas around recorded monuments known as 'zones of notification' which do not comprise buffer zones but are intended to indicate areas of

² National Monuments Service. Available At: <https://www.archaeology.ie/news/enactment-of-historic-and-archaeological-heritage-and-miscellaneous-provisions-act-2023-and> [Accessed 19.01.2024]

archaeological potential within their environs³. All archaeological sites listed in the Record of Monuments and Places receive statutory protection under the National Monuments (Amendment) Act, 1994 and no works can be undertaken at their locations without providing two months advance notice to the National Monuments Service.

There are **no recorded archaeological sites within the proposed development area** while there are **three archaeological sites recorded by the ASI within the 1km study area**.

The *County Donegal Development Plan 2024-2030* includes a number of policies and objectives in relation to the protection of the archaeological resource, details of which are presented in **Appendix 1**.

Architectural heritage

Protection of architectural heritage is provided for through a range of legal instruments that include the *Heritage Act 1995* (as amended), and the *Planning and Development Act 2000* (as amended).

The Heritage Act (1995) (as amended) defines architectural heritage as including: *all structures, buildings, traditional and designed, and groups of buildings including streetscapes and urban vistas, which are of historical, archaeological, artistic, engineering, scientific, social or technical interest, together with their setting, attendant grounds, fixtures, fittings and contents*.

The conservation principles of care and protection of architectural heritage and the facilitation of the listing of significant buildings of architectural merit are set out in Part IV of the *Planning and Development Act 2000* (as amended). This requires Local Authorities to maintain a Record of Protected Structures (RPS) of structures with special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, to be included in City/County Development Plans.

It is noted that as of 31st May 2024, the NIAH Architectural Heritage (National Inventory) and Historic Monuments (Misc) Provisions Act (1999) is now repealed, via a Commencement Order⁴ of the *Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023*.

The *Donegal County Development Plan 2024 – 2030* presents a number of objectives to ensure the protection of the architectural heritage resource, details of which are provided in **Appendix 1**.

There are no NIAH sites or protected structures within the subject site or its 1km study area. The nearest recorded NIAH structure is a farmhouse (Reg. No. 40902930) located c. 2km northwest of the subject site.

³ Archaeology and the Planning Process. Available at: <https://www.archaeology.ie/sites/default/files/media/publications/archaeology-planning-process-pl13.pdf> [Accessed 19.01.2024]

⁴ New powers to protect Ireland's valuable historic and archaeological heritage. Available at: <https://www.gov.ie/en/press-release/ab826-new-powers-to-protect-irelands-valuable-historic-and-archaeological-heritage/> [Accessed 27.08.2024]

Archaeological & historical background

Within the proposed development's extent, there are no recorded archaeological sites. However, the Archaeological Survey of Ireland (ASI) documents three archaeological sites within a 1km radius of the proposed development (**Figure 3**).

The nearest site is an enclosure (DG029-045----), situated 0.6km west of the subject site in the townland of Gransha. Additionally, a standing stone (DG038-003----) is located approximately 0.8km southwest of the subject site in the townland of Ballynahone. Lastly, there is another enclosure (DG029-042----) in the townland of Tullydush Lower, positioned approximately 0.9km northeast of the subject site.



Figure 3: Recorded archaeological sites (red dots) within the 1km study area (blue shaded area) from the subject site (red) (Image Source: Tailte Éireann, National Monuments Service, Historic Environment Viewer)

The proposed development site is located on forested terrain, with the Mill River traversing the lands to the north and east of the subject site. The surrounding townlands present several upland environs, such as Mouldy Hill located c. 2.3km to the southwest of the subject site, Meenkeeragh Hill (Gortnaskea) located 3km to its northeast and Sealy Mountain located 3.3km to its southeast.

There are no recorded archaeological sites located within the proposed development site boundary. The general wider rural environs indicate that there are a number of recorded archaeological sites in the surrounding landscape, including a series of standing stones, megalithic tombs and cairns in upland areas.

The earliest recorded evidence of human settlement in Ireland dates to the Mesolithic period (7000-4000 BC), namely scatters of lithics, shell middens and other evidence of temporary occupation. The Neolithic period (c. 4000-2400 BC) is marked by the appearance of various types of megalithic tombs. The Bronze Age period (c. 2400-500 BC) saw the introduction of standing stones, stone rows and stone circles.

Evidence of prehistoric settlement in the wider landscape relevant to the proposed development site at Ballynahone and Trillick sub-station is evidenced by Megalithic tomb – wedge tomb

(DG029-044----) which is located on the eastern side of Lough Swilly and the northeastern slope of Mouldy Hill. A prehistoric standing stone (DG038-003----), which is situated on bog land among craggy ridges, is also located within the study area, along with two enclosures which likely are indicative of medieval settlement (DG029-045---; DG029-042----).

The monuments are located in rough pasture with a rocky outcrop and blanket bog in Gransha townland. The wedge tomb was marked as 'Giants Den' on the First Edition 1:10,560 Ordnance Survey map and the Second Edition 1:2500 Ordnance Survey historic map editions. The standing stone was marked on the First Edition 1:10,560 Ordnance Survey edition and does not appear on later editions. The enclosure DG029-045--- was first depicted on the Second Edition 1:2500 Ordnance Survey map, while enclosure DG029-042---- was marked as 'Ruins of fort' on the First Edition 1:10,560 Ordnance Survey map and does not appear on later editions. Given the presence of the recorded monuments, this is indicative of likely continuous human settlement of the wider environs since prehistoric times.

A review of available photogrammetric DTM data and application of hillshade analysis to the subject site did not reveal any potential unrecorded upstanding features of archaeological interest.

The Excavations Database

The Excavations Database contains summary accounts of all licensed archaeological investigations carried out in Ireland (North and South) from the 1960s to present. The database does not record any programme of archaeological investigations within the townland of Ballynahone. A search for the townlands within the study area (Tullydush Upper, Tullydush Lower, Annaskee, Gransha, Letter, Trillick) revealed two licences for archaeological investigations.

In April 2007, the archaeological monitoring of the construction of a residential development identified Early Bronze Age pottery sherds within charcoal-rich material along with cremated bone (07E0861). The site was excavated in September of 2007 and confirmed the presence of an Early Bronze Age cremation burial.

In 2013 archaeological testing was carried out at a proposed windfarm site in Tullydush Lower (13E0089). Nothing of archaeological significance was identified.

Artefactual assemblage

A review of the Topographical Files of the National Museum of Ireland on 29th January 2024 indicated that there are **no recorded artefact finds** from the townland located within the study area.

Placenames

Townlands are the smallest unit of land division in the Irish landscape and many preserve early Gaelic territorial boundaries that pre-date the Anglo-Norman conquest. The layout and nomenclature of Irish townlands was recorded and standardised by the work of the Ordnance Survey in the 19th century. The Irish translations of the townlands names often refer to natural topographical features but name elements may also give an indication of the presence of past human activity within the townland, e.g. *dun*, *lios* or *rath* indicate the presence of a ringfort while *temple*, *saggart*, *termon* or *kill* record an association with a church site.

The Irish origins and translations for the townlands within the 1km study area (**Table 3**) were sourced from www.logainm.ie. The majority of the townland names assessed are indicative of topographical features, e.g. Ballynahone, which derives from *baile na hAbhann* ‘river town’, Tullydush, which derives from *tulaigh* ‘hillock’ and Letter which derives from *leitir* ‘hillside’.

Table 3: Translation of townland names (source www.logainm.ie)

Townland	Irish Root	Translation
Ballynahone	<i>Baile na hAbhann</i> <i>Baile</i> , townland, town, homestead, <i>abhainn</i> river	‘River town’
Tullydash Upper	<i>Tulaigh Dois Uachtarach</i> <i>Tulaigh</i> hillock	‘Hillock’
Tullydash Lower	<i>Tulaigh Dois Íochtarach</i> <i>Tulaigh</i> hillock	‘Hillock’
Letter	<i>Leitir</i>	‘Hillside’
Trillick	-	-
Gransha	<i>An Ghráinseach</i>	-

Cartographic review

The detail on historic cartographic sources demonstrates the nature of past settlements and land use patterns in recent centuries and can also highlight the impacts of modern developments and agricultural practices. This information can aid in the identification of the location and extent of unrecorded or partially levelled features of archaeological or architectural heritage interest. The cartographic sources examined for the study areas include the 1st Ed Ordnance Survey map (published in 1836) (**Figure 4**) and the 2nd Ed Ordnance Survey map (published c. 1904) (**Figure 5**).

The 1st ed OS map c. 1840 (**Figure 4**) shows that the subject site comprised a vacant area of boggy ground rough. ‘Rocks’, ‘Island’ and ‘Pipe’ are labelled within the northwestern corner of the site. The lands surrounding the site are comprised of irregularly shaped plots of rough land with rough pasture. The subject site borders the townland boundaries of Ballynahone and Trillick to its northern portion which is also a tributary of the Mill River. It is noted that the subject site is within the townland of Roosky on this map edition, with a reconfiguration of townland boundaries noted on the 2nd edition.

By the 2nd ed OS map c. 1904 there are some changes to the subject site (**Figure 5**). A building is depicted in the northwestern portion of the site and the land here is depicted as rough pasture with outcropping bedrock. A local access road traverses the central portion of the site on a north-northwest to south-southeast axis. The site is now wholly contained within the townland of Ballynahone and there is a notable retraction of lands formerly accorded to Roosky townland to the west. The eastern boundary of the subject site is no longer depicted as a townland boundary and has been extended further east.

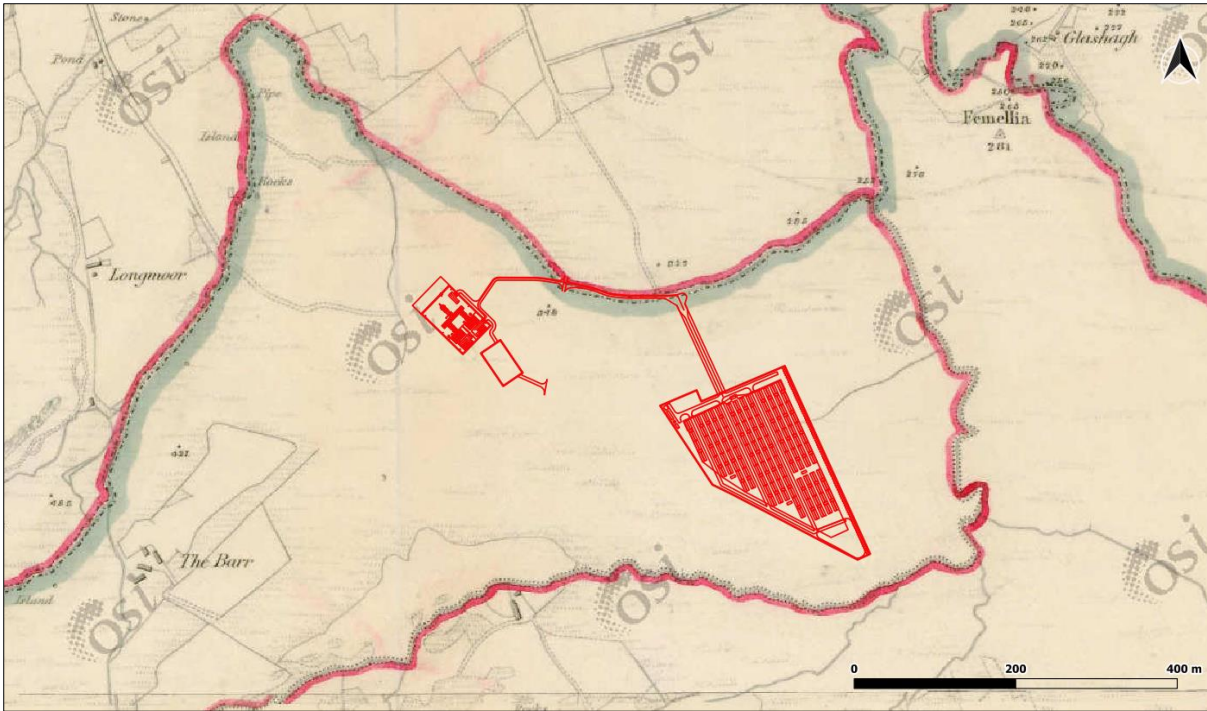


Figure 4: Extract from 1:10,560 Ordnance Survey map (1837-42) subject site indicated in red (Image Source: Tailte Éireann, National Monuments Service, Historic Environment Viewer)

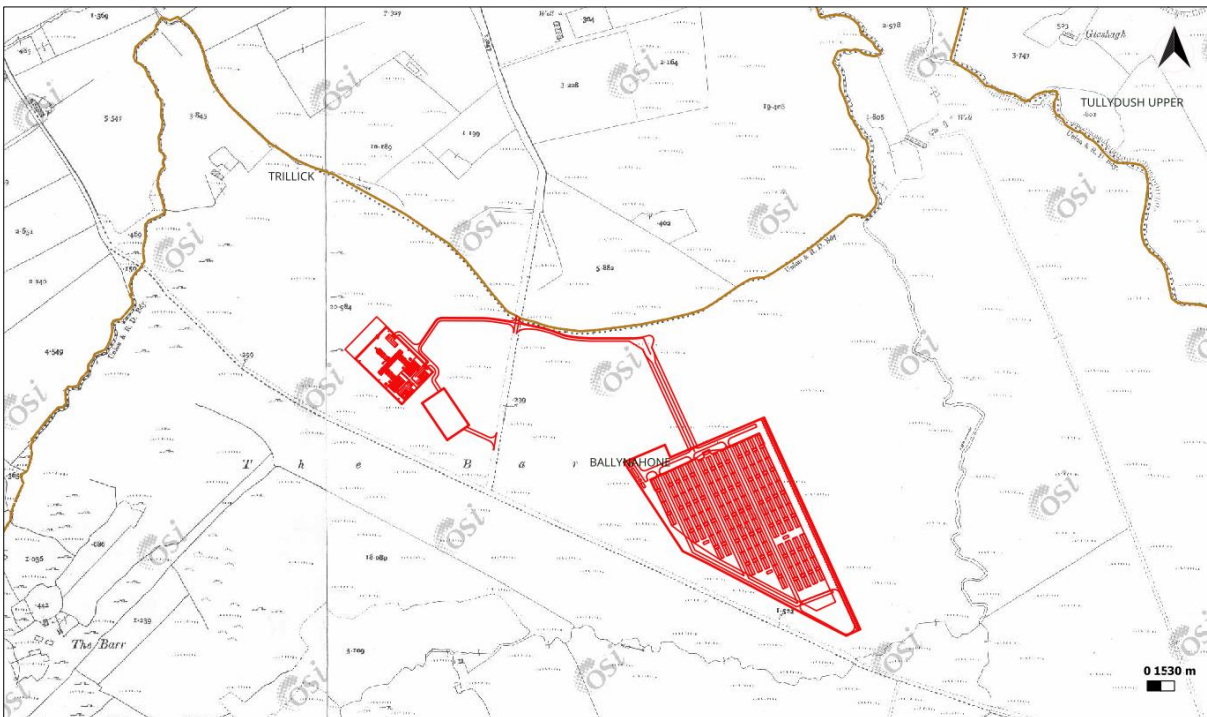


Figure 5: Extract from 1:2500 Ordnance Survey map (1888-1913) subject site indicated in red (Image Source: Tailte Éireann, National Monuments Service, Historic Environment Viewer)

4. Description of site

The proposed development comprises the addition of a long duration battery energy storage system immediately east of the existing Trillick ESB 110kV sub-station, County Donegal (**Figure 6**).

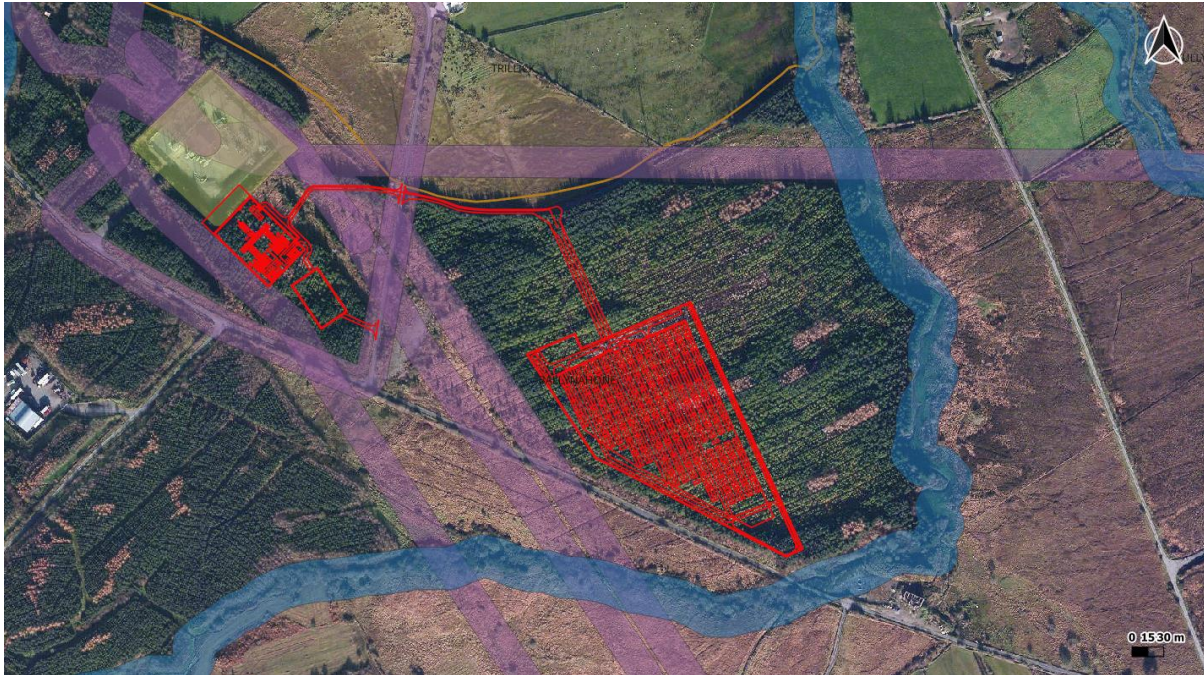


Figure 6: Proposed development site (red) with existing sub-station (green), OHLs with buffer (purple) and watercourse buffers (blue)

The Archaeological Survey of Ireland (ASI) records no archaeological sites within the extent of the proposed development area, there are three archaeological sites within 1km of the proposed development site.

A walkover field survey of the proposed development site was conducted by a suitably qualified archaeologist on 26th January 2024. All areas were not accessible due to the thick vegetation, forestry and high voltage electrical towers and overhead lines. In order to augment field walkover survey, the use of UAV was conducted within safe flying zones (outside of sub-station, towers, OHLs and associated buffer areas).

A photographic record of the site inspection was compiled, and extracts are presented in the **Appendix 2** to this report. Weather conditions were fair, and this provided good landscape visibility.

The aim of the archaeological field survey was to identify the location of previously unrecorded archaeological/cultural heritage features.

The surveyed landholding comprised very wet, level bogland covered with heather, rushes and small trees and shrubs, fenced off all around by barbed wire and an earthen ditch with brambles. The area for development proposal is currently a planted commercial forestry with clearance for the OHLs and towers from the existing sub-station. Access into these clearance areas was not

possible apart from the area containing Site Investigations Test Pits 3 and 4 (see **Appendix 2, Plates 4, 7, 8 & 9**) . The latter comprised very wet bogland with little grass cover and dense heather and rushes. There were no observations of potential archaeological surface feature expressions or upstanding items of built heritage during the field survey.

Assessment of significance

There are no recorded archaeological or architectural sites, finds or features within or adjacent to the proposed development area. The extensive nature of prior ground disturbance and landscaping (sub-station area) and change of land-use (commercial forestry) at the proposed development site indicates that there is low potential for encountering sub-surface archaeological remains. No upstanding undesignated cultural heritage features were observed from desk or field-based assessment.

The cultural heritage value/sensitivity of the proposed development site is considered negligible. The magnitude of impact on the site during construction stage is considered high. As such, there is a predicted likely **Not Significant** significance of effect on the Cultural Heritage resource.

5. Conclusions and recommendations

Conclusions

There are no recorded archaeological sites within the extent of the proposed development site, while there are three recorded archaeological sites within the 1km. There are no NIAH buildings or protected structures within the subject site or 1km study area. The proposed development comprises the addition of a long duration battery storage site to the area east of the existing Trillick ESB 110kV sub-station, County Donegal.

The proposed development will not give rise to any direct or indirect negative impacts or significance of effect on recorded/protected archaeological or architectural heritage sites.

The proposed site has had extensive previous ground disturbance works and landscaping for construction of the existing 110kv sub-station, as well as a significant change of use to commercial forestry plantation. There is low potential for encountering sub-surface archaeological remains.

As such, there is a predicted **Not Significant** significance of effect predicted for the cultural heritage resource.

Recommendations

Given the assessed negligible cultural heritage value/sensitivity of the proposed development site and the Not Significant significance of effect predicted for the cultural heritage resource, **no mitigation measures** are recommended in this instance.

6. References/sources

Internet resources

Donegal County Council. 2024. *County Donegal Development Plan 2024-2030* Available at: <https://www.donegalcoco.ie/CountyDonegalDevelopmentPlan2024-2030/County%20Donegal%20Development%20Plan%202024-2030.pdf> [Accessed 27/08/2024]

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Appendix 1: Donegal County Development Plan 2024-2030

The *County Donegal Development Plan 2024-2030* includes a number of policies and objectives in relation to the protection of the archaeological resource:

AYH-O-1 To conserve and protect archaeological heritage, achieve a greater public knowledge and appreciation of archaeology, protect existing access to, and where appropriate provide new access and visitor infrastructure for, such heritage.

AYH-P-1a. conserve and protect all forms of archaeological heritage including: i. National Monuments, ii. Structures on the Record of Historic Monuments (RHM), iii. the Record of Monuments and Places (RMP) iv. Sites and Monument Record (SMR), v. Historic Graveyards and environs, vi. Historic Towns, vii. Historic battlefield sites, viii. Unrecorded archaeology ix. Industrial and post-medieval archaeology; x. Underwater archaeology and xi. The settings of such heritage in accordance with the publication Framework and Principles for the Protection of Archaeological Heritage (DoAHGI 1999); and
b. Conserve and Protect Zones of Archaeological Protection located in Urban areas of Ballyshannon, Donegal Town, Killybegs, Lifford, Ramelton, Rathmullan and St. Johnston as identified in the Record of Monuments and Places including requiring the carrying out of an archaeological assessment prior to the granting of permission and the undertaking of additional archaeological mitigation where required (e.g. more extensive testing, excavation or licensed archaeological monitoring) to inform the planning application or, if appropriate, the imposition of similar archaeological mitigation (more extensive testing, excavation or licensed archaeological monitoring) as conditions of planning.

The policy will be implemented save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal the Bridgend to County border project scheme, the Bunrana Inner Relief Road and Greenways, subject to such projects being in accordance with all relevant statutory and regulatory provisions or where no statutory or regulatory provisions apply in so far as the policy provisions can be practicably and reasonably achieved within the context of such projects.

AYH-P-2 Protect existing access to, and facilitate appropriate new public access, informational and visitor infrastructure for, archaeological heritage (including signage, parking, pedestrian access, commemorative memorials, and interpretative facilities) where such development would not be detrimental to the character or setting of said heritage where statutory consent has been obtained from the National Monuments Service and where the development would not otherwise negatively impact on traffic safety, local residential amenities, natural environment or the visual or scenic amenities of the area. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of Strategic Infrastructure Projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner Relief Road and Greenways.

AYH-P-3 Ensure that development proposals affecting archaeological heritage sites shall:
a. Sensitively incorporate archaeological heritage Preserved In Situ in a manner which is compatible with the protection and proper management of such heritage and its setting including adequate safeguards from damage/vandalism and for public safety and suitable informational signage.

- b. Be accompanied by a long-term management plan that incorporates appropriate protections for the heritage site.
- c. Provide appropriate informational signage regarding any archaeological heritage which has been identified and Preserved by Record during the course of construction to an agreed standard with Donegal County Council and the National Monuments Service.

The policy will be implemented save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner Relief Road and Greenways subject to such projects being in accordance with all relevant statutory and regulatory provisions or where no statutory or regulatory provision applies in so far as the policy provisions can be practicably and reasonably achieved within the context of such projects.

AYH-P-4 Ensure that historic graveyards in the ownership or care of the Council are managed and maintained in accordance with legislation, appropriate/best conservation standards, in consultation with the National Monuments Service and the Department of Housing Local Government and Heritage.

The *County Donegal Development Plan 2024-2030* includes a number of policies and objectives in relation to the protection of the architectural heritage resource:

AH-O-1 Conserve, manage, protect and enhance the architectural heritage of Donegal namely Protected Structures, Architectural Conservation Areas, NIAH structures, designed landscapes and historic gardens, vernacular, historic building stock industrial and maritime built heritage, character and setting of such structures.

AH-O-2 Promote the sustainable and sensitive re-use of the existing built heritage as a positive response to climate change, and promote the circular economy and climate mitigation and adaptation through proper maintenance, repair and appropriate retrofitting, adaptive re-use and regeneration employing best conservation practice. This objective will be pursued on a collaborative and integrated basis in partnership with all relevant stakeholders and through all available funding mechanisms.

AH-P-1 Seek to ensure best conservation practice through the application of the Guiding Principles of Architectural Conservation as referenced above, where appropriate including in relation to RPS, NIAH, and Vernacular structures and within ACA's. In this regard, the use of specialist conservation professionals, conservation plans and crafts persons shall be encouraged.

AH-P-2 Protect traditional shopfronts and signage and where required and appropriate, ensure new shopfronts are of a high-quality architectural design.

AH-P-2A Promote the maintenance and appropriate re-use of the existing buildings stock of buildings with architectural merit as a more sustainable option to their demolition and replacement. Ensure that measures to upgrade the energy efficiency of protected structures and traditionally built historic structures are sensitive to traditional construction methods, employ best practice and use appropriate materials and methods that will not have a detrimental impact on the material, functioning or character of the building.

AH-P-2B Preserve, protect and enhance the special built character and functions of the ‘Heritage Towns’ of Ardara, Ballyshannon, Moville, Ramelton and Raphoe.

AH-O-3 Protect all structures and parts of structures on the Record of Protected Structures and to extend the RPS where appropriate.

AH-P-3a. Protect all structures or parts of structures on the RPS to include protection of the curtilage, attendant grounds; and,

b. Require that development proposals directly affecting structures on the RPS are appropriate in terms of architectural treatment, character, scale, and form to the existing protected structure and not detrimental to the special character and integrity of the protected structure and its setting save to the extent necessary to provide for strategic infrastructure projects including but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner Relief Road and Greenways, subject to such projects being in accordance with all relevant statutory and regulatory provisions.

AH-P-4a. Extend the Record of Protected Structures in order to provide a comprehensive schedule for the protection of structures of special importance in the County during the lifetime of the Plan; and

b. Identify structures for inclusion in the Record of Protected Structures based on the criteria set out in the Architectural Heritage Protection, Guidelines for Planning Authorities (2011), the NIAH and Ministerial recommendations.

AH-P-5 Any proposed development that includes proposed works to an RPS structure shall, where appropriate, provide for the works affecting the Structure to be carried out in the first phase of the development to prevent endangerment, abandonment and/or dereliction of the structure.

AH-O-4 Preserve the special character of the Ardara, Ballyshannon, Bunrana, Bundoran, Letterkenny, Ramelton, Raphoe, and Moville Architectural Conservation Areas.

AH-P-6 a. Protect and enhance the special character of ACAs to include traditional building stock, material finishes, spaces, streetscape, shopfronts, landscape and settings therein.

b. Protect all buildings, structures, groups of structures, sites, landscapes and all other features considered to be intrinsic elements to the special character of an ACA from unsympathetic demolition or alteration.

c. Ensure appropriate and sensitive reuse and rehabilitation of buildings and sites, secure appropriate infill and new development, and require high quality architectural design within and adjacent to ACAs.

d. Protect traditional shopfronts in ACAs and ensure new shopfronts are of a high quality architectural design.

e. Ensure all new signage, lighting, advertising and utilities within ACAs are designed, constructed and located in such a manner as not to detract from the character of the ACA.

f. Protect and reuse historic street finishes, furniture and features which contribute to the character of ACAs and associated areas of public realm.

AH-P-7 Protect NIAH structures by requiring that development of structures on the NIAH including the curtilage, attendant grounds and setting of the structure are appropriate in terms

of architectural treatment, character, scale, and form, and is not detrimental to the special character and integrity of the structure and its setting, save to the extent necessary to provide for strategic infrastructure projects including but not restricted to the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner Relief Road and Greenways. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.

AH-P-8 Ensure high quality architectural design of all new development relating to or which may impact on NIAH structures (and their setting) save to the extent necessary to provide for strategic infrastructure projects including but not restricted to the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner Relief Road and Greenways. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.

AH-P-9 Seek to protect, conserve and preserve vernacular structures, historic building stock and enhance the established character, forms, material features, and settings of vernacular buildings and historic building stock that are considered to be intrinsic elements of the character of a place, save to the extent necessary to provide for strategic infrastructure projects including, but not restricted to, the TEN-T Priority Route Improvement Project, Donegal, the Bridgend to County border project scheme, the Bunrana Inner Relief Road and Greenways., including:

- a. Vernacular and traditional style farmhouse buildings including Clachans and local authority labourer's cottages.
- b. Vernacular buildings, groupings of buildings on Donegal's Islands.
- c. Historic thatch structures as a key component of the built heritage of the county.
- d. Historic Building Stock such as traditionally stone built buildings. This policy will be implemented by the Council in so far as same can be practicably and reasonably achieved within the context of said projects.

AH-P-10 Seek to ensure that conversions or extensions to vernacular buildings and the provision of new adjoining buildings/traditional historic building stock shall be of a scale and form that complements the existing building and ensures that the distinctiveness and character of the vernacular form is retained and respected.

Appendix 2: Photographic record



Plate 1: View of location of test pits 5 and 6 (under powerlines) southeast of current sub-station, facing northeast



Plate 2: View of location of test pits 1 and 2 (under powerlines) southeast of current sub-station, facing northwest



Plate 3: View of proposed area for battery storage southeast of current sub-station, facing northeast



Plate 4: View of location of test pits 3 and 4 (under powerlines) east of current sub-station, facing southeast



Plate 5: View of current sub-station and landholding, facing southwest



Plate 6: View of current sub-station and area proposed for temporary Laydown Area , facing northwest



Plate 7: View field containing test pits 3 and 4 (only areas accessible), facing east



Plate 8: View of location of test pit 3



Plate 9: View of location of test pit 4