

11.0 CULTURAL HERITAGE

11.1 INTRODUCTION

The Proposed Development will comprise the establishment and operation of a soil recovery facility at the Applicant's lands in Kilmartin, Coynes Cross, Co. Wicklow. Full details of the Proposed Development are provided in Chapter 3.0: Project Description, and a summary is provided in Section 11.4 below. The Application Site ('the Site') is shown in Figure 3-1 in Chapter 3.0: Project Description.

This chapter of the EIAR considers the potential effects of the Proposed Development on cultural heritage. The cultural heritage assessment has been prepared by Conor Ryan. Conor is an Associate of the Chartered Institute for Archaeologists (ACIfA) and has over 8 years' experience in the production of heritage reports for planning purposes.

11.2 SCOPE

The scope of this cultural heritage assessment was to undertake a fully detailed baseline study, impact assessment, and effects analysis for the Proposed Development. The baseline was informed through desk-based and archival research using a standard set of sources, as set out within Section 11.6.

The impact assessment considers direct impacts from the works phase and restoration phase of the Proposed Development upon cultural heritage assets and also considers cumulative and combined effects.

Under the current programme, it is expected that the duration of operation of the soil recovery facility may last for between 4 -10 years depending on availability of soil to complete the Proposed Development. A restoration and aftercare phase for the Proposed Development has been considered along with the phasing of activities which is described in Chapter 3.0: Project Description.

For the purpose of clarity, this assessment uses the term 'works phase' to describe the period of time comprising the following construction activities:

- Enabling works to provide facilities required for the operation of the soil recovery facility (i.e., entrance upgrades, establishment of office and welfare facilities, etc); and
- The operation of the soil recovery facility (i.e. acceptance of clean soil and stone to Site and its subsequent emplacement within the fill area).

A restoration phase broadly follows the work phase (with some temporal overlap).

It is not anticipated that there will be any indirect impacts from the Proposed Development, so these have been scoped out and are not considered within this assessment. Informed by the results of the impact assessment, an appropriate and proportionate mitigation strategy for the Proposed Development has been provided, with residual effects subsequently assessed.

In lieu of specific guidance from the Institute of Archaeologists of Ireland (IAI), this impact assessment conforms to the guidelines set out by the Chartered Institute for Archaeologists (CIoA, 2020a; 2020b).

For the purposes of this EIAR, the term ‘cultural heritage’ is used as a collective term to refer to all heritage assets of archaeological, architectural, and historical or cultural value. Archaeological heritage typically refers to objects, monuments, buildings, environmental remains, or cultural landscapes older than AD 1700, although it can also be used to describe objects, monuments and other tangible remains that date from post-AD 1700. Architectural heritage (or built heritage) refers to structures or buildings (including their contents) of cultural value that are younger than AD 1700. Designed landscapes and gardens dating to post-AD 1700 are also considered to be architectural in this assessment. In both cases, the setting of a heritage asset is considered an integral part of its value.

11.2.1 SITE LOCATION AND DESCRIPTION

The Site is located in the townland of Kilmartin, Co. Wicklow and is approximately 4 km north-east of Ashford (centred on ITM 728478, 701180) (see Figure 1.1). The Site is irregular in shape and is bounded to the south and north by agricultural land with some coniferous forestry to the south, containing a stream flowing east to west. Coynes Cross road is located to the west of the Site, and this connects to the R772 and M11 (via Junction 14) to the south-west of the Site. An existing entrance to the Site is located on the Coynes Cross Road. A small lane is located to the east of the Site that links the L-5064 to the R761 Coast Road. The land further to the east is agricultural land.

The Site is set in a rural agricultural landscape and is used for sheep grazing and some small arable crop farming in the northern section. The steep sided nature of the valley that forms the Site, and the periodically wet waterlogged ground at the base of the valley, limits the land’s agricultural potential. Consequently, the land use is mainly confined to sheep grazing.

11.2.2 STUDY AREA

In order to capture sufficient baseline data to robustly assess direct impacts to cultural heritage assets, the spatial scope of the assessment comprises all the land that may be required for the Proposed Development (i.e., land situated within the ‘Application boundary’ shown on Appendix 11B), together with a buffer of 1 km around the Proposed Development to allow for the assessment of impacts to the setting of heritage assets. The Study Area is shown in Appendix 11B.

11.3 LEGISLATIVE AND POLICY CONTEXT

11.3.1 LEGISLATION AND GUIDANCE

The Minister for Housing, Local Government and Heritage (representing the Department of Housing, Local Government and Heritage) is responsible for the conservation, preservation, protection, and presentation of Ireland’s cultural heritage. The protection of archaeological heritage is the responsibility of the National Monuments Service (NMS), whilst architectural heritage is the responsibility of the Built Heritage Policy Section (including the Architectural Heritage Advisory Service (AHAS) and National Inventory of Architectural Heritage (NIAH)).

At the national and international level, the key legislation pertinent to this assessment includes:

- The National Monuments Acts, 1930 to 2004;
- The Heritage Act, 1995;
- The Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999;

- The Planning and Development Acts, 2000 to 2016;
- The Convention concerning the Protection of the World Cultural and Natural Heritage (1972), ratified by the Irish Government in 1991; and
- The European Convention on the Protection of the Archaeological Heritage (Revised) (1992), ratified by the Irish Government in 1997.

Guidelines on the assessment of impacts on, and the protection of, cultural heritage assets in Ireland have been consulted and adhered to for this impact assessment, including:

- Guidelines on the information to be contained in Environmental Impact Assessment Reports (2022) – EPA;
- The Framework and Principles for the Protection of the Archaeological Heritage (1999) – Department of Arts, Heritage, Gaeltacht, and the Islands (DAHGI); and
- Architectural Heritage Protection: Guidelines for Planning Authorities (2011) - Department of Arts, Heritage, and the Gaeltacht (DAHG).

11.3.2 LEGISLATIVE MECHANISMS OF PROTECTION

There are a number of mechanisms for heritage protection in Ireland. Heritage assets can be protected under the National Monuments Acts 1930 to 2004 in four ways:

- The asset is recorded in the Record of Monuments and Places (RMP);
- The asset is registered in the Register of Historic Monuments (RHM);
- The asset is a national monument subject to a Preservation Order (or Temporary Preservation Order); and
- The asset is a National Monument in State Care.

Heritage assets can also be protected under the Planning and Development Act 2000, which requires all Local Authorities to curate and maintain a Record of Protected Structures (RPS). A heritage asset is protected if it is inscribed on a county's RPS. Protected Structures may be archaeological in nature and may appear on both the RMP and county RPS.

The 'Convention concerning the Protection of the World Cultural and Natural Heritage' (1972) provides The United Nations Educational, Scientific and Cultural Organization (UNESCO) with the power to inscribe heritage assets of international importance on the World Heritage List as a World Heritage Site. Local authorities and stakeholders are encouraged to protect these sites through the production of Management Plans, which aim to manage the Site in a suitable fashion.

Local authorities also have mechanisms by which to protect heritage assets, including the creation of Architectural Conservation Areas (ACAs) and Areas of Archaeological Potential (AAPs) (or equivalents).

The mechanisms of heritage protection described here also afford protection to the setting of cultural heritage assets, as well as the physical assets.

11.3.3 PLANNING POLICY

At the local level, the Wicklow County Development Plan (WCDP) (WCC 2022) guides planning policy in relation to cultural heritage. Chapter 8 of the WCDP specifically outlines the approach taken by Wicklow County Council (WCC) to protecting archaeological and architectural heritage within the planning process.

WCC also has a heritage management plan (WCC 2017), which has been consulted for reference, where applicable.

11.3.4 PRE-CONSULTATION

A non-statutory pre-consultation process was carried out with prescribed bodies and other parties over 25 May- 26 June 2023 to seek their comments and observations about the Proposed Development. This process is fully documented in the Pre-Consultation Report accompanying the Strategic Infrastructure Development (SID) application submission and a summary is provided in Section 1.8 (Chapter 1.0: Introduction) of this EIAR. Pre-consultation opinions/comments received relating to cultural heritage have been considered in the preparation of this EIAR chapter.

11.4 PROJECT DESCRIPTION

A full project description is provided in Chapter 3.0 (Project Description). A project description summary is provided below:

The Proposed Development is the establishment and operation of a soil recovery facility within a 17.08 hectare site at Kilmartin, Co. Wicklow (approximately 4 km north-east of Ashford). The soil recovery facility will import up to 2,160,000 tonnes of inert waste, primarily clean soils and stones from construction and development sites. Clean soil and stone will be used to progressively infill a steep-sided natural valley within the Site and raise ground levels to approximately 57mOD, tying in with the surrounding landscape. The infill area covers approximately 14 hectares.

The soil recovery facility will accept up to 100 loads per day on average (maximum 150 in exceptional circumstances) with a projected operational lifespan of up to 10 years depending on market conditions within the construction sector, followed by one year for final restoration and aftercare of the lands.

The Proposed Development will require the following structures be installed and maintained for the operational life of the Soil Recovery Facility: office and welfare facilities, six parking bays for private vehicles, weighbridge and associated weighbridge cabin, one wheel wash and one spray-system wheel wash, two waste inspection bays and one bunded waste quarantine area, hardstanding area (for vehicle movement and storage), surface water drainage infrastructure from hard standing and discharge to ground (including two interceptors and two soakaways), an internal access road, internal haul roads (constructed from recycled aggregates where available), security features including security gates and fencing, and power supply. These structures will be removed from the Site at the end of life point of the soil recovery facility.

Approval will be sought for a connection to the ESB Network for the Site office and welfare facilities. Diesel generators will be used to power mobile lighting, if required. Temporary lighting, if required, will be cowled to prevent light spillage.

The temporary relocation of ESB poles within the fill area will be required. This will be subject to prior agreement with ESB.

Wastewater from office and welfare facilities will be managed by a third-party provider, with no connection to foul water mains.

All truck deliveries will access the Site via the N11/M11 and Coynes Cross Road, with internal queuing space provided within the Site and no parking on public roads.

The existing land entrance located on R772 will be upgraded and will be retained following the completion of the Proposed Development.

A groundwater abstraction borehole will be installed to supply water for wheel washes, dust suppression, and welfare facilities, and will be retained for monitoring after restoration.

Restoration will return the Site to grassland and hedgerow habitat, similar to its pre-development state. Approximately 140 m of fence and hedgerow opposite the entrance will be temporarily removed to improve sightlines during the life of the soil recovery facility and this will be subsequently reinstated. Native species will be used in hedgerow planting. The restored land will revert to agricultural management.

Permission is sought from An Coimisiún Pleanála for a period of up to 10 years, with an additional year for restoration. The Proposed Development will require a waste licence¹ from the Environmental Protection Agency (EPA) and aligns with national and regional policy objectives to provide adequate licensed soil recovery capacity for the Dublin and Wicklow regions.

11.5 ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

This assessment has been produced in accordance with national and local legislation and policy, as well as best practice guidance. The impact assessment methodology aligns with EPA's Guidelines on the information to be contained in Environmental Impact Assessment Reports, (EPA, 2022) and has been adapted from the advice provided by the National Roads Authority (NRA), in their Guidelines for the Assessment of Architectural Heritage Impacts of National Roads Schemes and Guidelines for the Assessment of Archaeological Heritage Impacts of National Roads Schemes (no publication date). These guidelines can be equally applied to other development schemes.

The assessment has been completed using a phased qualitative assessment methodology, as outlined here:

- Heritage assets with the potential to be affected by the Proposed Development are identified and ascribed a 'value', ranging from "unknown" to 'very high';
- The 'magnitude' of any impacts resulting from the Proposed Development upon the identified receptors are established, ranging from 'no change' to 'high' (assuming no mitigation is in place);
- A comparison of the magnitude of impact and receptor value is used to calculate the significance of effect; and
- Where required, a mitigation strategy is proposed, with the significance of effect re-calculated (assuming any proposed mitigation is in place) to ascertain the residual effects.

¹ The proposed development will be carried out in accordance with a waste licence from the EPA or in accordance with by-product regulations, Article 27 of the European Communities (Waste Directive) Regulations 2011 (see Section 3.5 in Chapter 3.0: Project Description of this EIAR for further detail).

Effects to heritage assets can result from both direct and indirect impacts. Direct effects are considered here to be those which result in an immediate, physical impact to an asset, or as a result of changes to the heritage asset setting, as a result of the Proposed Development design or from mitigation to reduce or remove impacts related to other environmental disciplines. Indirect effects are those that are not a direct result of the Proposed Development and would typically be produced away from the Site or because of a complex pathway. No indirect effects are anticipated and have been scoped out of this assessment.

Consultation with other specialists, in particular air quality, noise, and landscape and visual, have been undertaken to capture combined effects and provide a holistic assessment of impacts upon cultural heritage assets.

11.5.1 ASSESSMENT OF VALUE OF HERITAGE ASSETS

The value of a cultural heritage asset can be assessed using the criteria presented in Table 11-1.

Table 11-1 - Criteria for Assessing the Value of Heritage Assets

Value of Heritage Asset	Criteria
Very High	World Heritage Sites (including nominated sites); Heritage assets of acknowledged international importance; and/or Heritage assets that can contribute significantly to acknowledged international research objectives.
High	Heritage assets inscribed on the RMP, RHP or RPS; Undesignated heritage assets of recognised quality or importance (e.g., proposed for inclusion on the RMP, ACAs); and/or Heritage assets that can contribute significantly to acknowledged national research objectives.
Medium	Undesignated heritage assets of regional importance or that might contribute to regional research objectives.
Low	Undesignated heritage assets of local importance; Heritage assets compromised by poor preservation and/or poor survival of contextual associations; and/or Heritage assets of limited value, but with potential to contribute to local research objectives.
Negligible	Heritage assets with very little or no surviving cultural interest.
Unknown	The importance of the heritage asset cannot be ascertained.

11.5.2 ASSESSMENT OF MAGNITUDE IMPACT

The scale and magnitude of impacts on heritage assets can be assessed using the tiered grading system presented in Table 11-2.

Table 11-2 - Criteria for Assessing Magnitude of impact on Heritage

Magnitude of Impact	Criteria
High	Changes to most or all key archaeological/architectural elements, such that the heritage asset is totally altered; and/or Comprehensive changes to setting.
Medium	Changes to many key archaeological/architectural elements, such that the heritage asset is clearly modified; and/or Considerable changes to setting.
Low	Changes to key archaeological/architectural elements, such that the heritage asset is slightly altered; and/or Slight changes to setting.
Negligible	Very minor changes to elements or setting; and/or Archaeological receptors are altered but no information is lost
No change	No change.

11.5.3 ASSESSMENT OF SIGNIFICANCE OF EFFECTS

Using the value of a heritage asset as indicated in Table 11-1, and the magnitude of impact as ascertained from Table 11-2, Table 11-3, indicates how the assessment of the significance of an effect has been concluded.

Table 11-3 - Significance of Effect Matrix

		MAGNITUDE OF EFFECT				
		No change	Negligible	Low	Medium	High
VALUE OF ASSET	Very High	Imperceptible	Slight	Moderate/ Significant	Significant/ Profound	Profound
	High	Imperceptible	Slight	Slight/ Moderate	Moderate/ Significant	Significant/ Profound
	Medium	Imperceptible	Not Significant	Slight	Moderate	Moderate/ Significant
	Low	Imperceptible	Not Significant	Not Significant	Slight	Slight/ Moderate
	Negligible	Imperceptible	Imperceptible	Not Significant	Not Significant	Slight

Where Table 11-3 includes two significance categories, reasoning is provided if the lower of the two significance categories is selected.

Residual adverse effects of 'large' or 'profound' significance are considered to be 'significant' for the purposes of this assessment.

11.6 EXISTING ENVIRONMENT

The existing environment is described within the Baseline Conditions section (Section 11.6).

11.7 BASELINE CONDITIONS

The results of the baseline study are presented here as a summarised appraisal of the various disparate data sources. They have been separated into archaeological and architectural heritage assets. For ease of reference, each heritage asset has been assigned a unique ID reference comprising a two-letter prefix ('AR' for archaeological assets and 'BU' for architectural assets, where identified), followed by a sequentially increasing number. This allows information from different datasets, each with their own reference systems, to be collated into a single receptor list. The results are presented in Figure 11-1.

11.7.1 DATA SOURCES

The baseline study comprised a comprehensive desk-based review of existing, remotely available heritage datasets within the Study Area, which has allowed a good understanding of the baseline cultural heritage conditions at and around the Site to be established. Sources of information consulted include:

- The sites and Monuments Record (SMR), compiled and maintained by the Archaeological Survey of Ireland (ASI) unit of the NMS, for details regarding all known monuments and sites²;
- The NIAH Building and Garden³ Surveys, for details regarding buildings, structures, demesnes, designed landscapes and historic gardens of architectural importance;
- The RMP, compiled and maintained by the NMS, for details regarding protected sites;
- The NMS for details regarding national monuments in State care (ownership or guardianship of the Housing, Local Government and Heritage) and for monuments subject to Preservation Orders;
- The Wicklow County Development Plan (WCDP) (2022-2028) for details regarding the county's RHM, RPS, national monuments in State care (ownership or guardianship of the Local Authority), monuments subject to Preservation Orders, ACAs, and AAPs;
- UNESCO for details regarding inscribed and tentative World Heritage Sites;
- The topographical files of the National Museum of Ireland (NMI) for details of any finds held in the national archive relevant to the Site;
- The SMR, Excavations Bulletin, and Transport Infrastructure Ireland Digital Heritage Collection for details of previous excavations;
- Ordnance Survey Ireland for historic cartographic and aerial image sources, in order to conduct a map regression;
- Pre-existing environmental reports containing information pertinent to the historic environment of the Site;

² The SMR and NIAH Building Survey datasets are available in a downloadable Geographical Information System (GIS) format.

³ The NIAH Garden survey is a work in progress. The desk-based survey (Phases 1 and 2) has been completed, but the field survey (Phase 3) remains incomplete. A policy framework and method of protection remain to be determined.

- Modern online aerial image sources (e.g., Google Earth, Bing Maps); and
- Data published by Wicklow County Council for the N11/M11 Junction 4 to Junction 14 Improvement Scheme project.

11.7.2 ARCHAEOLOGICAL HERITAGE

11.7.2.1 Sites and Monuments Record and the Record of Monuments and Places

There are 22 archaeological heritage assets from the SMR recorded within the Study Area, as shown in Figure 11-1. The details of all 22 heritage assets and two others at the eastern edge of the study area are presented in the Cultural Heritage Gazetteer (Appendix 11A).

None of the 24 heritage assets or their zones of notification are located within the Site, but four of the heritage assets, located to the immediate west of the application boundary (AR-13, AR-14, AR-16, and AR-20), relate to archaeological remains of prehistoric habitation that was discovered during excavations for the N11 in 2001 and 2002. They consisted of a range of post holes, stake holes and burnt deposits, as well as prehistoric flint and pottery remains. Of the four habitation sites within the Study Area, only one is identified for inclusion on the RMP (AR-16). It is probable that further archaeological remains related to these heritage assets will extend to the east and into the application boundary.

Other prehistoric heritage assets within the Study Area include the excavation of a prehistoric pit (AR-15), located to the east of the Site, and four fulacht fiadh, a type of cooking pit that typically dates to the Bronze Age. The closest of these (AR-21) is located to the southwest of the Site and was excavated during development of the N11, whilst the other three (AR-06, AR-08 and AR-17) are located to the east of the Site, with AR-08 and AR-17 having been excavated under licence.

To the northeast of the Site there are four heritage assets related to a medieval period: a stone church (AR-10); the associated graveyard (AR-12); a font (AR-09); and an undefined 'architectural feature' that may be a holy water stoup (AR-11). The church and graveyard sit within what is now a small patch of trees, with some above surface remains still standing. The graveyard, which was described as disused in the early 20th century, is south of the church building, which measures 14 m x 8 m and overlooks the west-facing slope of the valley. The antiquity of the church is unclear and the number of burials in the graveyard is also unconfirmed. All four assets are either currently listed on the RMP or have been identified for inclusion on future revisions of the RMP.



Figure 11-1 - Standing remains of church (AR-10) to the northeast of the Site

A number of earthworks of probable medieval date are also recorded within the Study Area, including a ringwork (AR-03) and the remains of the stone foundations of a potential castle (AR-04) to the north of the Site (see Figure 11-1). A modern dwelling (1950s) has since been built on the Site of the original structure, but the ringwork remains discernible. Two other ringforts (raths) are also noted within the Study Area; AR-07 to the north of the Site and AR-05 to the west. A former moated (AR-23) and two enclosures (Ar-18 and AR-22) are also recorded to the southwest of the Site, whilst to the southeast is an enclosed field system demarcated by earthworks (AR-24).

A bullaun stone (AR-01) and holy well site (AR-02) are also recorded within the Study Area, to the north and northwest of the Site, respectively.

11.7.2.2 Preservation Orders

The church (AR-10), located to the northeast of the Site, is a national monument subject to a Preservation Order (PO Number 133/1940). The heritage asset and the zone of notification around it are outside the application boundary.

11.7.2.3 National Monuments in State Care

A national monument is defined by the National Monuments Act, 1930 as an asset 'the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic or archaeological interest attaching thereto'. A National Monument in State Care is one in the

ownership or guardianship of the Minister for Housing, Local Government and Heritage or a Local Authority.

The nearest National Monument in State care is the church at Kilcoole (SMR ref: WI013-029001-), located approximately 6.5 km north of the Site.

11.7.2.4 Register of Historic Monuments (RHMs)

There are no RHMs disclosed for WCC in the WCDP.

11.7.2.5 Record of Protected Structures

A new Record of Protected Structures for the WCDP (2022-2028) is not yet available from WCC. None of the archaeological heritage assets recorded within the Study Area are listed on the WCC RPS (2016-2022).

11.7.2.6 Areas of Archaeological Potential

The Site is not located within an Area of Archaeological Potential or Significance. The nearest Area of Archaeological Potential or Significance is the deserted Anglo-Norman Borough at Newcastle, approximately 2.75 km northeast of the Site.

11.7.2.7 World Heritage and the Tentative List

There are no World Heritage Sites recorded within the Study Area. The nearest World Heritage Site to the Site is Brú na Bóinne (Archaeological Ensemble of the Bend of the Boyne), located 75 km to the north. The Royal Sites of Ireland, comprising five individual sites in Ireland (Cashel, Dún Ailinne, the Hill of Uisneach, the Rathcroghan Complex and the Tara Complex) as well as Navan Fort in Northern Ireland (UK), is listed on the Tentative List for Ireland for consideration for inclusion on the World Heritage List. Dún Ailinne, the seat of the kings of Leinster, is located approximately 47 km west of the Site. Glendalough, located approximately 16 km west of the Site, is also listed on the Tentative List for Ireland, as part of the Early Medieval Monastic Sites.

11.7.2.8 Topographical Files

Available online resources, specifically the National Museum of Ireland: Finds Database (2010), indicates two findspots in the Study Area, both just north of the Site. One of these is the findspot of a silver penannular brooch. The other has limited information available, described only as 'Millstones Clay and Ironrp'.

11.7.3 ARCHITECTURAL HERITAGE

11.7.3.1 The National Inventory of Architectural Heritage

There is no architectural heritage assets listed on the NIAH Building Survey that are recorded within the Study Area.

There are three architectural assets listed on the NIAH Garden Survey that are recorded within the Study Area, the indicative boundaries of which are shown in Figure 11-1. Kilmartin (BU-03) occupies the northern extent of the Site, whilst to the northeast is the Sweet Bank estate at Tiglin (BU-02) and to the northwest is Kiltimon (BU-01). The parkland at these three heritage assets has been mapped from historic Ordnance Survey mapping but is discernible in the current landscape.

11.7.3.2 Architectural Conservation Areas

The Site is not within an ACA. The nearest ACA to the Site is the Brickfield ACA in Wicklow, located approximately 6.75 km southeast of the Site.

11.7.4 PREVIOUS STUDIES AND ARCHAEOLOGICAL INVESTIGATIONS

In addition to the two excavations recorded on the SMR (AR-14 and AR-15), ten additional excavations are recorded on the Excavations Bulletin (www.excavations.ie) within the Study Area.

Two excavations are recorded to have been undertaken to the immediate west of the Site, both of which took place in 2002 (refs: 02E0754 and 01E1072) in advance of the N11 road scheme. These identified a range of archaeological materials, including pits and deposits, post holes, burnt remains and pottery across an extensive area. This has been tentatively dated to the Bronze Age, although a later date is possible.

A further six excavations associated with development of the N11 road scheme are recorded to have been undertaken within the Study Area in 2001 and 2002; one of these is to the northwest (ref: 01E0657) of the Site, which identified no remains of archaeological significance, whilst the others are clustered to the south of the Site (refs: 01E0866, 01E1072, 01E0656, 01E0657, 01E0471 and 02E0019). Of these, one found no remains of archaeological significance (01E0656), whilst the others identified extensive evidence of prehistoric use, dating from the late Neolithic into the Bronze Age (including the habitation sites within and along the southwestern boundary of the Site, specifically AR-20 and AR-13). The excavation listed on the SMR at AR-14 was completed under licence reference 02E1351 and uncovered the habitation site at AR-16.

Two excavations recorded (refs. 01E0435 and 01E0822) were undertaken in 2001 at the fulacht fiadh at AR-17 and AR-08, respectively. At AR-17, a small portion of the pit excavated, with a range of materials and features were identified, including several pits, stake holes and a variety of burnt materials. Bronze Age pottery, as well as burnt remains, were recorded at AR-08.

11.7.5 HISTORIC MAP REGRESSION AND AERIAL IMAGERY

Historic mapping and aerial imagery for the Site is available from Ordnance Survey Ireland, including:

- 6 Inch Colour and Black & White – 1840;
- 25 Inch Black & White – 1897-1913;
- Aerial photography (black and white - orthorectified) – 1995;
- Aerial photography (colour - orthorectified) – 2000;
- Aerial photography (colour - orthorectified) – 2005; and
- Aerial photography (colour) – 2021.

The 6" map, dating from the early- to mid-19th century, depicts the Site as largely undeveloped agricultural land within a wider rural landscape, with the demesnes of Kilmartin (BU-03), Sweet Bank (BU-02) and Kiltimon (BU-01) clearly shown. The church at AR-10 is depicted, labelled as 'in ruins', with a small patch of woodland indicated in the centre of the Site. The modern field pattern and road layout within the Site, and across the wider area, is easily discernible on this map, with some smaller

field boundaries removed to create larger fields. To the west of the Site, a road alignment is shown, which largely follows the alignment of the modern N11 road.

The 25" map, dating from the turn of the 20th century, is equally recognisable when compared to modern aerial imagery and shows that the Site remained undeveloped throughout this period. There is no indication of significant development at the Site or in the surrounding area, with the church at AR-10 continued to be shown (and labelled as 'in ruins'), but the central woodland area is no longer shown.

Aerial photography from 1995 is the next available imagery, which provides the first evidence of more extensive residential development activity along the roads around the Site, particularly to the north and northwest, although the Site itself remains largely undeveloped. A north-south aligned power line is shown running north to south to the immediate west of the Site. AR-10 is discernible as a small, wooded patch to the northeast corner of the Site. This depiction continues on aerial imagery through to 2000. Imagery from 2005 captures the development of the road improvement works at Junction 14 along the N11, including the construction of a service station. This includes construction of a new road adjacent to the southwest corner of the Site, although the remainder remains undeveloped. The surrounding landscape also remains relatively undeveloped.

This remains unchanged in the most modern aerial imagery (2021).

11.7.6 UNDISCOVERED ARCHAEOLOGICAL REMAINS

There are several known archaeological heritage assets to the immediate west of the Site footprint, with a variety of known, recorded archaeological heritage assets throughout the rest of the Study Area. There has also been extensive archaeological excavation associated with the construction of the N11, which has uncovered a range of archaeological materials dating to the prehistoric period. The presence of such varied archaeological material in close proximity to the Site, and the contemporary dates of the majority of the discoveries, the potential for further previously undiscovered heritage assets to exist as sub-surface archaeological remains high.

11.8 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

The Proposed Development comprises: shallow soil stripping works (e.g. the stripping and storage of the existing topsoil) and infilling with inert soils and rock to raise the level of the land, with the topsoil subsequently to be restored and the land returned to agricultural use.

11.8.1 CHARACTERISTICS OF SIGNIFICANCE FOR CULTURAL HERITAGE

The total area of the application boundary is 17.08 ha. Ground disturbance through topsoil stripping has the potential to directly impact heritage assets that are located within the Site.

Visual changes to the landscape, both from soil stripping activity and infilling during works phase also have the potential to impact cultural heritage, in particular the setting of heritage assets. Dust and noise generating activities from stripping and infilling also have the potential to impact upon heritage assets.

11.9 POTENTIAL EFFECTS

Using the assessment methodology described in Section 11.4, the effects of the Proposed Development upon heritage assets have been assessed. Due to the nature of the Proposed Development (i.e., progressive infilling), only initial construction of the welfare, areas of hard-

standing and drainage etc. have been considered as enabling works construction activities within the works phase. All other infilling activities and movement of plant and machinery in relation to this is considered as operational activities within the works phase (see Section 2.3.3. in Chapter 2.0: Scope and Methodology, and Section 3.4.3. in Chapter 3.0 Project Description, for a description of the works and restoration phases used in this assessment).

11.9.1 WORKS PHASE – ENABLING WORKS CONSTRUCTION ACTIVITIES IMPACTS

There are no direct physical impacts anticipated to the known archaeological heritage assets within the Study Area as none of them fall within the Site. It is considered that there is high potential for previously undiscovered archaeological remains to be present within the Site, which would be expected to be directly impacted as a result of ground disturbance during construction activity. Any such remains would be of low to medium value given their likely prehistoric date, and any impact would be 'High, Permanent Adverse'. Therefore, the significance of effect would be 'Moderate Adverse'.

11.9.2 WORKS PHASE – SOIL RECOVERY FACILITY OPERATIONAL IMPACTS

There will be direct physical impacts on the medium valued Kilmartin Historic Garden and Designed Landscape (BU-03). The northern end of the Site is within the former demesne boundary and infilling will raise the ground level in this area and disturb the field layout that still matches the boundaries depicted in the 19th century. The impacts are anticipated to be low, temporary, reversible adverse with changes to the designed element of the field systems so that the heritage asset is slightly altered. There will be no impacts to the key elements of the demesne, such as the woodland and garden areas around the house. Therefore, the significance of effect would be 'Slight Adverse'.

There are potential direct impacts to the setting of the medieval church (AR-10) and graveyard (AR-12) due to the proximity of the Site to the heritage asset. The operation of the Proposed Development will introduce noise and visual impacts⁴ The church and graveyard currently sit within a mainly rural setting with residential housing to the west and the N11 road to the southwest and west. The impacts of the Proposed Development would be temporary and reversible in nature but would result in considerable changes to the setting of the heritage assets, mainly due to noise from the Proposed Development operation. The visual impacts to the southwest would not impact greatly to the rural setting of the church and graveyard, and this setting would be maintained to the north and east. As heritage assets of high value, receiving a direct, temporary, reversible, medium impact, the significance of effect would be 'Moderate Adverse',

The other heritage assets within the church (AR-09 and AR-11) would not be impacted by the Proposed Development as their settings do not extend beyond the church and their immediate surroundings. The adjacent in-situ remains of prehistoric activity (AR-16) to the Site would not be impacted by the Proposed Development either as the setting of the heritage asset does not contribute to its significance.

It is not anticipated that impacts from the Proposed Development would extend beyond the immediately adjacent heritage assets due to the low level of the land at the Site and the existing vegetation in the landscape.

⁴ The potential impacts arising from noise are also addressed in EIAR chapter 10.0.

Table 11-4 presents the potential effects on cultural heritage assets during operation of the soil recovery facility.

Table 11-4 - Potential Effects during Works Phase Soils Recovery operation activities

Heritage Asset Reference	Description of Impact	Asset Value	Magnitude of Impact	Significance of Effect (before mitigation)
AR-10	Impact to setting	High	Medium	Moderate Adverse
AR-12	Impact to setting	High	Medium	Moderate Adverse
BU-03	Damage to heritage asset through soil stripping and infilling	Medium	Low	Slight adverse
Potential Archaeological Remains	Damage or loss of heritage asset through construction	Medium	High	Moderate adverse

11.9.3 RESTORATION PHASE

Ground disturbance will be limited to works phase, and so no direct physical impacts are predicted as a result of restoration activities.

Once infilling activity ends and the Site is restored, visual impacts on the setting of heritage assets will be mainly reversed as the rural setting will be restored.

Table 11-5 presents the potential effects on heritage assets after decommissioning of the soil recovery facility.

Table 11-5 - Potential Effects During Restoration

Asset	Description of Impact	Asset value	Magnitude of Impact	Significance of Effect (before mitigation)
AR-10	Restoration of agricultural land and the rural setting	High	No Change	Imperceptible
AR-12	Restoration of agricultural land and the rural setting	High	No Change	Imperceptible
BU-03	Restoration of agricultural land and the rural setting	Medium	No Change	Imperceptible

11.9.4 DO-NOTHING SCENARIO

If the Proposed Development did not go ahead, i.e., the 'do-nothing' scenario, there would be no change to the existing baseline as described in Section 11.5 and there would be no impact upon heritage assets.

11.10 MITIGATION AND MONITORING

11.10.1 WORKS PHASE MITIGATION

To mitigate for the potential presence of undiscovered archaeological remains within the Site, it is recommended that strip map and record under archaeological supervision during topsoil stripping is undertaken by a suitably qualified and licensed specialist archaeological contractor. The appointed archaeological contractor will be required to prepare an archaeological method statement for the proposed archaeological work, which will need to be agreed and approved by the National Monuments Service of the Department of Housing, Local Government and Heritage. The appointed archaeological contractor will also be required to obtain the relevant licences to undertake the works.

No mitigation is considered necessary to mitigate the moderate adverse effect predicted on the church (AR-10) and graveyard (AR-12), or the slight adverse effect predicted upon BU-03 during operation of the soil recovery facility. It is anticipated that upon restoration of the Site, the existing field boundaries and rural setting will be restored, and the impact will be reversed.

11.10.2 RESTORATION PHASE MITIGATION

No cultural heritage specific mitigation is required during restoration phase.

11.10.3 MONITORING

Beyond the proposed archaeological investigation strategy, no long-term or on-going monitoring for cultural heritage is required.

11.11 RESIDUAL EFFECTS

11.11.1 OPERATION EFFECTS (WORKS PHASE)

By implementing the proposed mitigation strategy, the direct impacts to potential archaeological heritage assets will be reduced as any archaeological remains discovered will be preserved by record.

The residual effects of the Proposed Development during the works phase are presented in Table 11-6.

Table 11-6 - Residual Effects – Works Phase

Golder ID	Description of Impact and mitigation	Asset value	Magnitude of Impact (after mitigation)	Significance of Effect (after mitigation)
AR-10	Impact to setting. No mitigation recommended	High	Medium	Moderate adverse (The effect is assessed as moderate rather than significant as the impacts to the setting will be mainly reversible once operations are complete)
AR-12	Impact to setting. No mitigation recommended	High	Medium	Moderate adverse (The effect is assessed as moderate rather than

Golder ID	Description of Impact and mitigation	Asset value	Magnitude of Impact (after mitigation)	Significance of Effect (after mitigation)
				significant as the impacts to the setting will be mainly reversible once operations are complete)
BU-03	Damage to heritage asset through soil stripping	Medium	Low	Slight adverse
Potential Undiscovered Archaeological Remains	Damage or loss of heritage asset through soil stripping	Medium	Medium	Moderate adverse

The residual effects on cultural heritage from operation of the Proposed Development will be as most 'Moderate Adverse' and are considered to be **Not Significant**.

11.11.2 RESTORATION PHASE

The residual effects during the restoration phase will be the same as those stated prior to mitigation (see Table 11-6). Effects during decommissioning are predicted to be 'imperceptible' and are therefore considered to be **Not Significant**.

11.12 CUMULATIVE EFFECTS

The cumulative effects associated with other permitted / under construction third-party developments have been considered in Chapter 15.0 of this EIAR . Cumulative effects are considered to be **Not Significant**.

11.13 DIFFICULTIES ENCOUNTERED

A key limitation is that the assessment methodology cannot account for heritage assets that are not recorded in the available data sources. Previously unrecorded heritage assets, such as sub-surface archaeological remains, which do not present any diagnostic features, would not necessarily be identified by the desk-study.

Information has been used from a range of sources to determine baseline cultural heritage conditions. This assessment is therefore limited by the availability and reliability of these data sources.

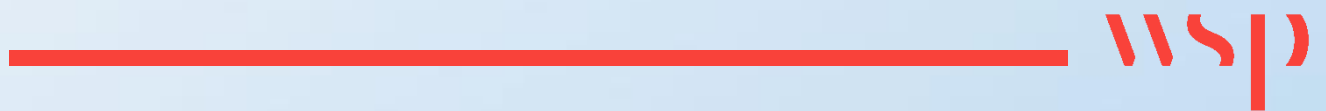
A cultural heritage specific site visit was not undertaken, restricting opportunities for assessing direct impacts to setting (particularly with regards to visual effects). This has been overcome using photographs and observations collected by other practitioners during site visits, and through close collaboration with other relevant specialists (air quality, noise, and landscape and visual).

11.14 REFERENCES

- CIfA (2020a). Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment.
- Department of Arts, Heritage, Gaeltacht, and the Islands, (1999). The Framework and Principles for the Protection of the Archaeological Heritage. Government of Ireland: Dublin.
- Department of Arts, Heritage, and the Gaeltacht, (2011). Architectural Heritage Protection: Guidelines for Planning Authorities. Government of Ireland: Dublin.
- Environmental Protection Agency, (2022). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR). Environmental Protection Agency: Ireland.
- National Roads Authority, (no publication date). Guidelines for the Assessment of Archaeological Heritage Impacts of National Roads Schemes. National Roads Authority: Ireland.
- WCC (2017) County Wicklow Heritage Plan 2017 – 2022. Wicklow County Council: Ireland.
- WCC (2021) N11/M11 Junction 4 to Junction 14 Improvement Scheme Option Selection Report Appendix D9 and Constraints mapping. Available at: <https://n11m11.ie/maps/>
- WCC (2022) Wicklow County Development Plan 2022-2028. Wicklow County Council: Ireland.

Appendix 11A

CULTURAL HERITAGE GAZETTER





Archaeological Assets

WSP ID	SMR Reference	Description	Easting (ITM)	Northing (ITM)	Townland	RMP	Sensitivity/Value
AR-01	WI019-045----	Bullaun stone	728655	702215	BALLYVOLAN LOWER	Yes	High
AR-02	WI019-015----	Ritual site - holy well	727773	701792	KILTIMON	Yes	High
AR-03	WI019-017----	Castle - ringwork	728706	701774	BALLYVOLAN LOWER	Yes	High
AR-04	WI019-017001-	Castle - unclassified	728707	701764	BALLYVOLAN LOWER	Yes	High
AR-05	WI019-012----	Ringfort - rath	727372	701746	KILTIMON	Yes	High
AR-06	WI019-046----	Fulacht fia	729565	701723	BARNACOYLE BIG	Yes	High
AR-07	WI019-016----	Ringfort - rath	728412	701690	KILMARTIN	Yes	High
AR-08	WI019-048----	Fulacht fia	729476	701631	BARNACOYLE BIG	Yes	High
AR-09	WI019-018003-	Font	728710	701472	KILMARTIN	Yes	High
AR-10	WI019-018001-	Church	728713	701472	KILMARTIN	Yes	High
AR-11	WI019-018004-	Architectural feature	728717	701470	KILMARTIN	Yes	High
AR-12	WI019-018002-	Graveyard	728714	701461	KILMARTIN	Yes	High
AR-13	WI019-072----	Habitation site	728213	701205	KILMARTIN	No	Low
AR-14	WI019-078----	Excavation - miscellaneous	728181	701093	KILMARTIN	No	Low
AR-15	WI019-047----	Excavation - miscellaneous	729245	701052	BARNACOYLE BIG	No	Low
AR-16	WI019-053----	Habitation site	728302	701008	KILMARTIN	Yes	High
AR-17	WI019-050----	Fulacht fia	729190	700919	KILMARTIN	Yes	High
AR-18	WI019-014----	Enclosure	727693	700893	COURTFOYLE	Yes	High
AR-19	WI019-070----	Habitation site	728101	700850	KILMARTIN	No	Low
AR-20	WI019-071----	Habitation site	728387	700845	KILMARTIN	No	Low
AR-21	WI019-073----	Fulacht fia	728198	700621	RATHMORE	No	Low
AR-22	WI019-067----	Enclosure	727396	700571	COURTFOYLE	Yes	High
AR-23	WI019-013----	Moated site	727706	700355	COURTFOYLE	Yes	High
AR-24	WI019-042----	Field system	728641	699931	KILLOUGHTER	Yes	High

Architectural Assets

WSP ID	NIAH Ref	Description	Easting (ITM)	Northing (ITM)	Townland	Sensitivity/Value
BU-01	5535	Kiltimon - demesne	727475	702400	KILTIMON	Medium
BU-02	4352	Sweet Bank - demesne	729264	701949	TIGLIN	Medium
BU-03	4351	Kilmartin - demesne	728454	701524	KILMARTIN	Medium

Appendix 11B

CULTURAL HERITAGE FIGURE



