

## FURTHER ENVIRONMENTAL INFORMATION

<b>Report</b>	Further Environmental Information
<b>Project</b>	Dunbeg South Extension WF
<b>Planning ref</b>	LA01/2024/1221/F
<b>Townlands</b>	Dunbeg and Gortcorbies
<b>Parish</b>	Drumachose
<b>Barony</b>	Keenaght
<b>County</b>	Derry
<b>Grid Ref</b>	Centred on 274559, 425943
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<b>Distributed To:</b>	Gahan Long Archaeologists Client
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## 1 Background

It is proposed to construct an extension to the consented Dunbeg South Wind Farm, Limavady. The Development will involve construction of 4 wind turbines (maximum tip height 149.9m) and associated ancillary works (figures 1 and 2).

This report details the information to address the request for further environmental information as issued by Causeway Coast and Glens Borough Council (31/10/2025).

## 2 Consultation

DFC:HED issued the following consultation response in relation to the archaeological impact assessment conducted as part of the planning application for the proposed development (27/10/2025):

*HED (Historic Monuments) notes that the application site is in proximity to several sites and monuments recorded on the Department's Sites and Monuments Record (SMR). HED (Historic Monuments) advises that further information is now requested as per Policy BH 3 of PPS 6.*

### *Considerations*

*HED (Historic Monuments) notes that the application site is in proximity to several sites and monuments recorded on the Department's Sites and Monuments Record (SMR). These include rath (LDY 010:010) and sweat house (LDY 010:014) which are monuments of regional importance and protected under the provisions of the Historic Monuments and Archaeological Objects (NI) Order 1995. Policy BH 1 of PPS 6 and para. 6.8 of SPPS. Additionally, the application site is adjacent to several sites representing prehistoric activity on Keady Mountain. These would include megalithic complex (LDY010:018), field system (LDY010:022), stone circle (LDY010:015), occupation site (LDY010:020) and ring barrow (LDY010:019) – all of which are protected under Policy BH 2 of PPS 6 at minimum.*

*HED (Historic Monuments) has reviewed Chapter 5: Archaeology and Cultural Heritage within the Dunbeg South Extension Windfarm: Environmental Statement- Volume II- Main Report and Appendices, submitted to the consultee hub on the 15th of November 2024. HED (Historic Monuments) notes that while the ES chapter has assessed indirect setting impacts upon a range of scheduled historic monuments within 5km, it has not assessed the setting effects upon the complex of prehistoric sites and monuments located close to the south-west of the PDA as noted above (NISMR refs LDY 010:018, LDY 010:022, LDY 010:015, LDY 010:020, LDY 010:019). Setting effects are a material consideration under planning policy for both regionally and locally important archaeological sites and monuments.*

*Consequently, HED (Historic Monuments) advises that the potential impacts upon the settings of this adjacent complex of site and monuments must be assessed, to include a photomontage from prehistoric barrow, LDY 010:019, towards the application site. Further information is requested as per Policy BH 3 of PPS 6. Prehistoric barrow, LDY 010:019, is a monument of local importance and its settings are protected under Policy BH 2 of PPS 6. The above detail is now required to clarify the potential archaeological impacts of this scheme and demonstrate compliance with PPS 6 policy requirements.*

HED (Historic Monuments) is aware that the location for the ring barrow was previously incorrect on the public map viewer.

#### Explanatory Note

The application site is in proximity of prehistoric barrow, LDY 010:019, a monument of local importance and protected under Policy BH 2 of PPS 6. The Bronze Age barrow, which was excavated by McL. May, was recorded to consist of a mound, measuring 70 ft in diameter. The top of the mound appeared intentionally flattened, but it was revealed to be a small chamber that held a cremation urn and ritual grave goods. This prehistoric monument is one of several recorded on Keady Mountain demonstrating the ritualistic importance of this location during all prehistoric periods.

A site visit in January 2025 had found the monument to be in excellent condition and in a different location than what is recorded on the Department's Sites and Monuments Record (SMR). The precise location of the monument is recorded now to be southwest of the application site. The proposed development could have a significant impact on the visual settings of the barrow. As such, HED (Historic Monuments) have requested an additional photomontage/wireframe to demonstrate the proposed development's impact on the barrow.

### 3 Visual Impact Assessment

#### 3.1 Impact Assessment Methodology

##### 3.1.1 Types of Impact

The types of impact of the proposed development on archaeological features may be divided into the following categories.

**Direct:** where there may be a physical effect on a site caused by the proposed development. Direct effects may be caused by a range of activities associated with the construction and operation of proposed development features. In addition, above-ground disturbance such as that caused by vehicle movement and soil and overburden storage, may produce irreversible effects upon archaeological features. Direct effects on archaeological features are normally adverse, permanent and irreversible.

The second category of direct impact relates to the visual impact that may exist from or to the monument from the proposed development. This may adversely affect the setting of a monument within the wider archaeological/historical landscape. A direct impact of this nature relates only to those monuments categorised as State Care and Scheduled.

**Indirect:** where the setting of a site or monument may be affected. Setting in this assessment is understood in functional terms only. Indirect effects may relate to new development causing a visual impact, such as reducing views to or from cultural heritage features with important landscape settings, or may cause increased fragmentation of a monument's setting.

**Uncertain:** where there is a risk that the works may impinge on a site, for example, where it is not clear where the location or boundaries of a site lie.

Potential effects, direct and indirect, have been assessed in terms of their scale, longevity, reversibility and nature (beneficial/neutral/adverse). The importance of both direct and indirect impacts can vary depending on the nature of the archaeological site under consideration.

### 3.1.2 Definitions of Assessment of Importance

The main thresholds of archaeological importance defined in PPS 6 are Regional Importance and Local Importance.

Sites of Regional Importance comprise State Care Monuments, Scheduled Monuments and other important sites and monuments which would merit scheduling.

Sites of Local Importance are those that are not scheduled, but have significance within a regional or local context. This may, for example apply to their importance to regional or local history, or they may be the only local example of a monument type. They may also include sites about which there is limited information such as findspots, sites identified by from aerial photographs, sites identified by OS Memoirs whose locations are unknown or the site of a now destroyed monument. Such sites may comprise component parts of a landscape rich in archaeological monuments, and thereby gain greater significance.

### 3.1.3 Definitions for the Assessment of Magnitude of Change

Consideration of the scale, extent of change, nature and duration of effect are important in determining the magnitude of change.

**Table 1: Definitions for the Assessment of Magnitude of Change**

Level of Magnitude	Definition of Magnitude
High	Total loss or major alteration to key elements/features/characteristics of the baseline conditions such that post development character/composition/attributes will be fundamentally changed.
Medium	Partial loss or alteration to one or more key elements/features/characteristics of the baseline conditions such that post development character/composition/attributes will be partially changed.
Low	Minor loss of or alteration to one or more key elements/features/characteristics of the baseline conditions. Change arising from the loss/alteration will be discernible but underlying character/composition/attributes will be similar to pre development circumstances/patterns

Level of Magnitude	Definition of Magnitude
Negligible	Very minor loss or alteration to one or more key elements/features/characteristics of the baseline conditions. Change barely distinguishable, approximating to the No change situation.

### 3.1.4 Definitions for the Assessment of Significance

An assessment of importance and magnitude can then be undertaken to determine how significant an impact is.

**Table 2: Definitions for the Assessment of Magnitude of Significance**

		IMPORTANCE	
		Local	Regional
MAGNITUDE	Negligible	No change	No change
	Low	Slight	Moderate
	Medium	Moderate	Substantial
	High	Substantial	Substantial

The assessment of the impact on the setting of this monument has been conducted using the guidance set out in the HED document: Guidance on Setting and Historic Environment. This document sets out a three-step approach to assessing setting:

1. Identify the heritage assets
2. Define and analyse the setting
3. Assess the change.

In assessing the change, the guidance document provides a non-exhaustive list of parameters to consider. These include (but are not limited to) inter-visibility, distance from the development, scale of the development relevant to the setting of the asset, prominence of both asset and development, position in relation to key views, competition with or distraction from the asset, sense of place of the asset.

## 3.2 Archaeological Baseline

The identified monument LDY 10:19 is recorded as a barrow in the Gortcorbies Td. The monument is located approximately 400m southwest of the nearest pint of the red line boundary for the application (figure 3).

The monument is recorded in the NISMR as *“This site, which was excavated by McL.May, was 30yds SW of a stone circle & chambered grave Ldy 010:018. The site consisted of a mound 70ft in diameter with a burial in a pit on top, E of the centre. In the pit was an urn with fragments of a cremation, stratified 4" above a food vessel”*.

The monument survives as an impressive earthen mound in an area of upland pasture (plate 1). It is located on the north facing slope of Keady mountain and enjoys expansive views to the west towards Lough Foyle (plate 2). The existing turbines of the Dunbeg wind farm are visible in the views to the northeast. The site has an intervisible relationship with the monuments LDY 10:20, recorded as an occupation site which was also excavated by McL. May in the 1940s; and LDY 10:18 which is recorded as a megalithic complex consisting of two stone circles and a chambered tomb. Both these monuments may be contemporary with the barrow site. Turbines from the consented Dunbeg South wind farm will be located around the monument from northeast-southwest.



**Plate 1: monument LDY 10:19 looking north.**



**Plate 2: Google satellite image showing the expansive view west from the monument.**

### 3.3 Visual Impact Analysis

A wireframe and photomontage of the view from the monument towards the proposed development have been generated (figure 4). The wireframe indicates that the full extent of the four turbines will be visible from the monument and this information is confirmed by the photomontage.

The introduction of the Dunbeg South Extension turbines will not significantly impact upon the setting of monument LDY 10:19. While all four turbines will be visible, these are contained within the spread of turbines for the existing and consented turbines positioned to the northeast of the monument. The proposed turbines will be located at greater distance from the monument than those of the already consented Dunbeg South Wind Farm (closest consented Dunbeg WF turbine- 185m; closest proposed Dunbeg South Ext WF turbine- 680m). As a result, the proposed turbines will introduce no further dominance of the monument of competition with it in the local landscape.

The critical views from the monument would reflect the inter-relationships with adjacent monuments (LDY 10:18 and LDY 10:20) and the expansive views to the west across Lough Foyle. In both cases these views have been compromised by the consented Dunbeg South WF. In addition, the proposed turbines are not visible in the views west from the monument.

The introduction of the proposed development will represent a very minor alteration to the characteristics of the baseline conditions. This change will be barely distinguishable, approximating to the No change situation.

Figure 1: Location of the application site.

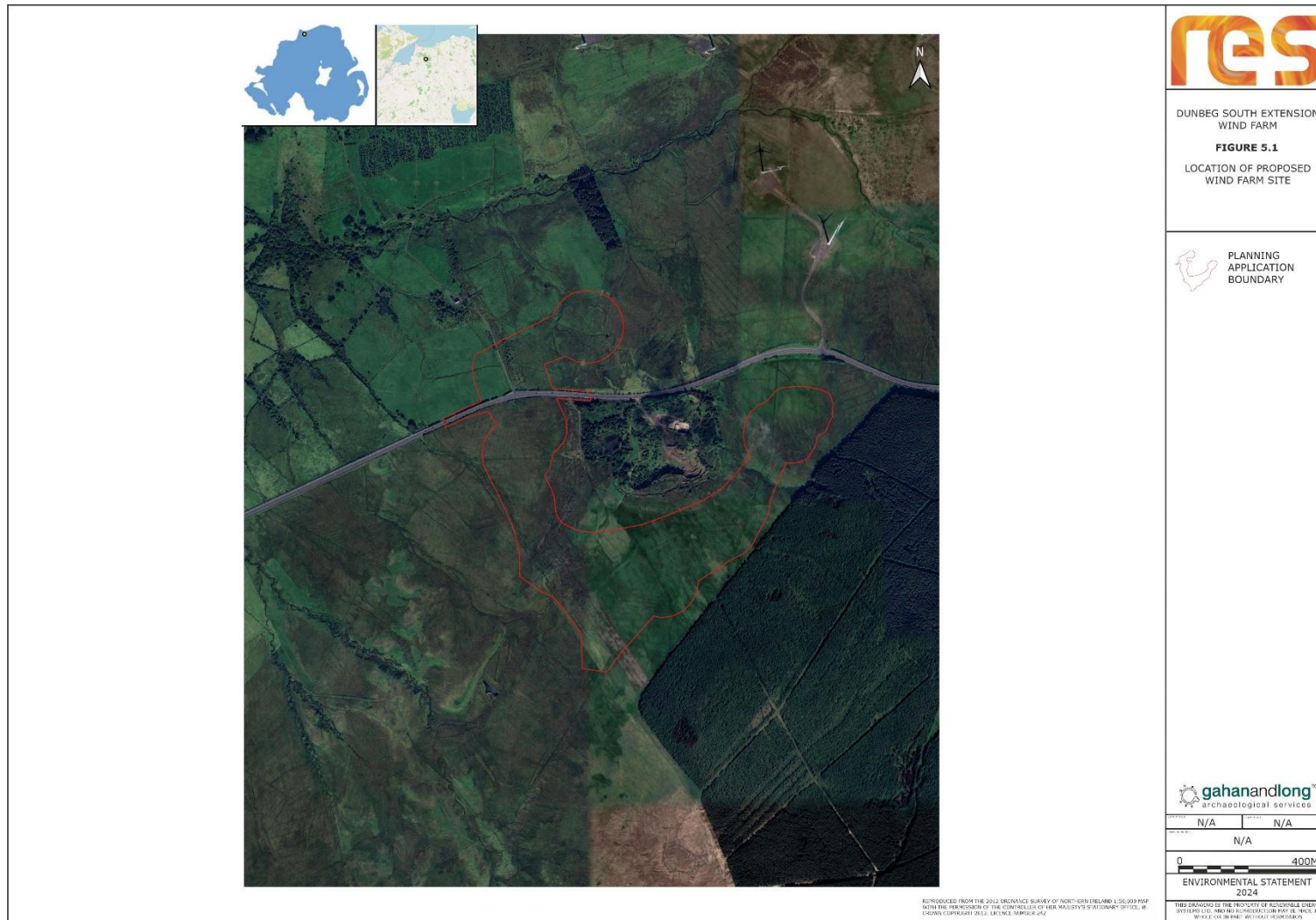


Figure 2: Layout of the application site.

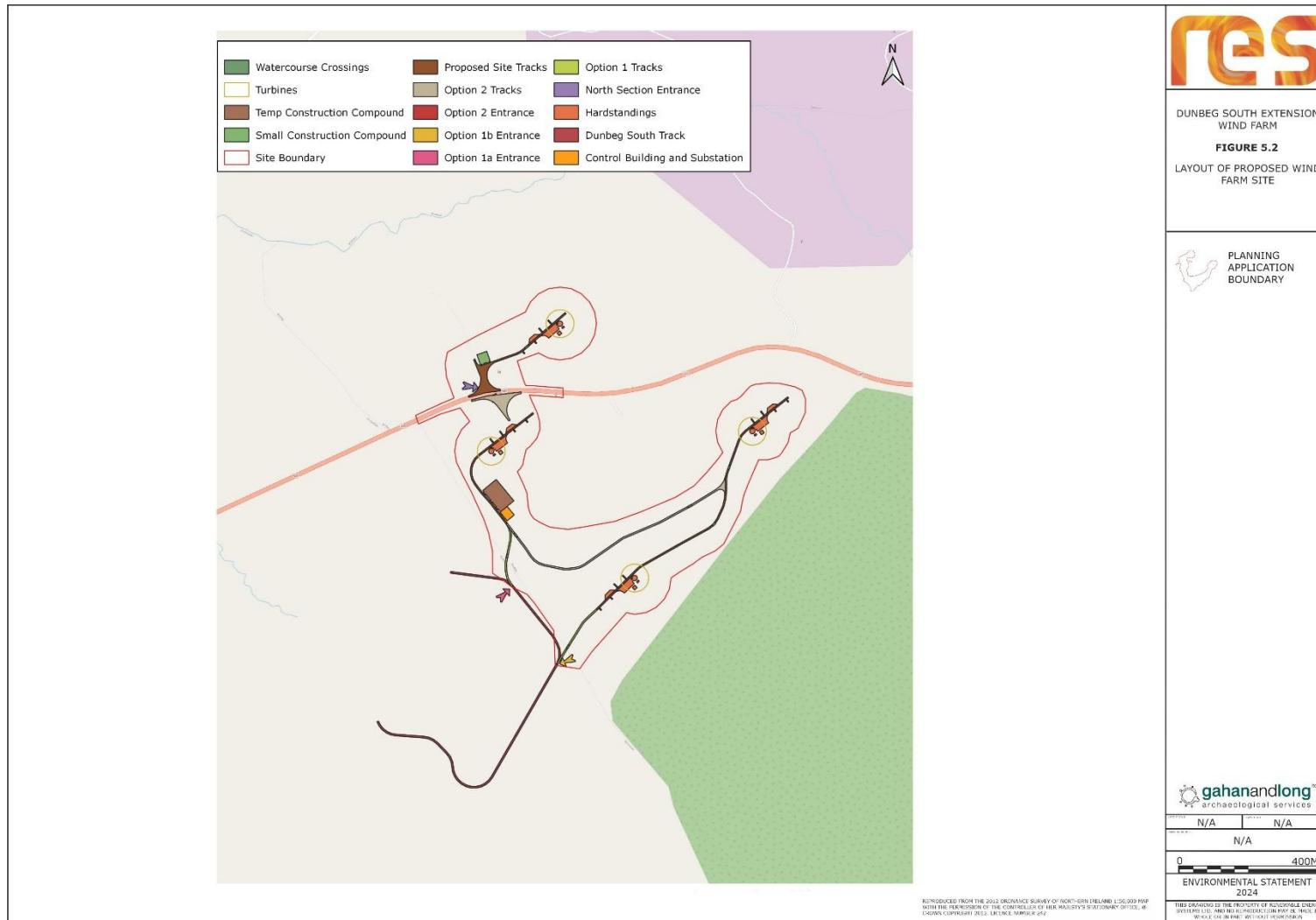


Figure 3: Location of monument LDY 10:19 and adjacent monuments.

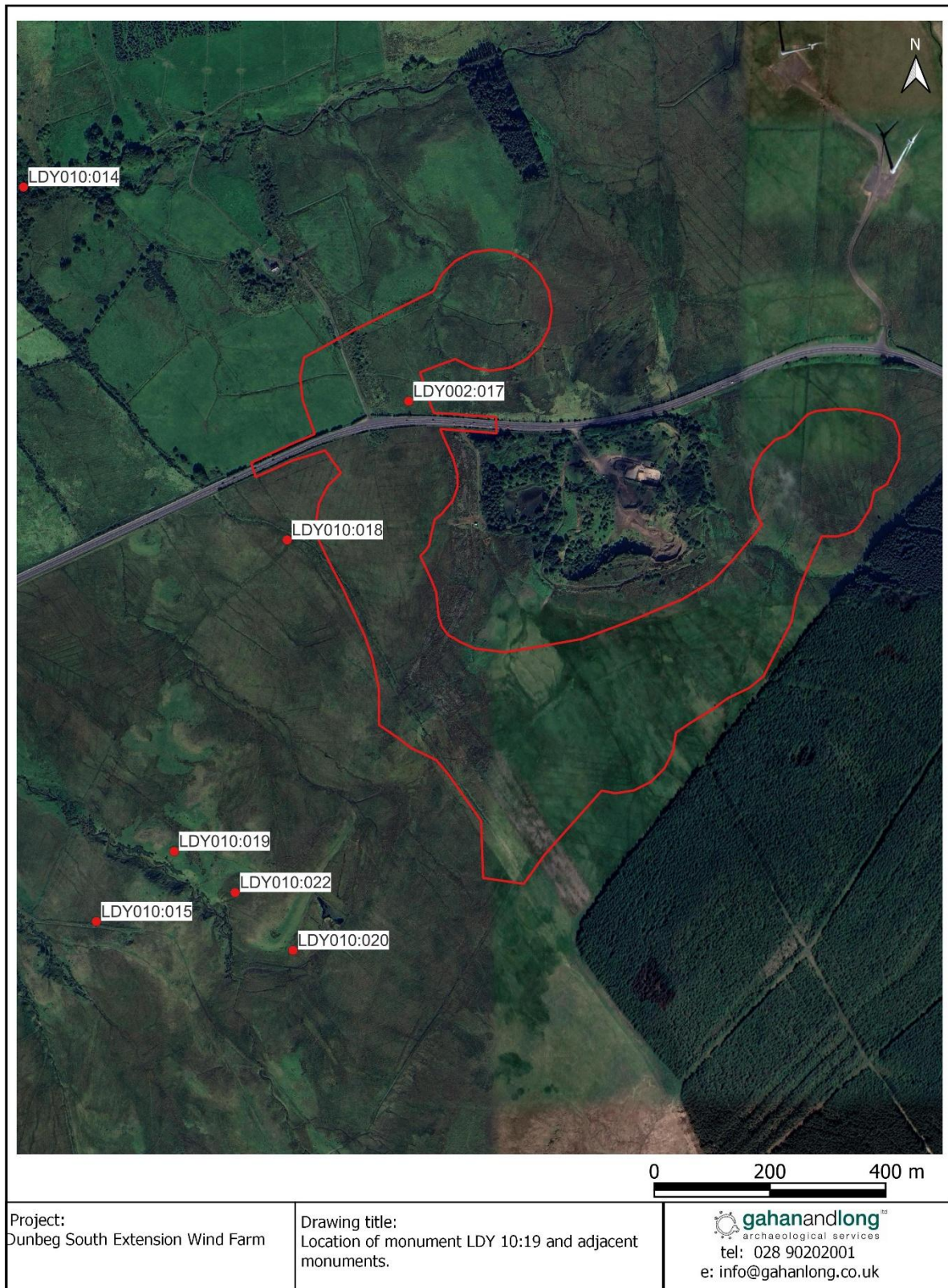


Figure 4: Wireframe and photomontage of view from monument LDY 10:19 towards the application site.

