

TBR15 – Cultural Heritage

Curraghinalt, Gortin

December 2025

Response to Transboundary Consultation Representations – [REDACTED] (Gahan & Long)

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
TBA1493 - An Taisce – pg. 21	Cross refers to the report by Dr [REDACTED] on Cultural Heritage, Cultural Landscape and People and Place , prepared for the Rebuttal of Save our Sperrins to DGL re the importance of the Sperrin Mountains in terms of cultural heritage.	No	<p>Assessments have not downplayed significance and have assessed cumulative impacts.</p> <p>The proposed development will contribute to the ongoing transformation of the upland cultural landscape of the local and wider landscape. The cumulative direct physical impacts on sub-surface archaeological remains are likely to be limited due due to the scale of development in the surrounding rural landscape. This impact will be manageable through standard archaeological mitigation. The cumulative in-direct (setting and perceptual) impacts have the potential to be more significant, particularly for upland archaeological monuments.</p> <p>The desk-top survey identified 34 archaeological monuments within the search area for the proposed development, of which eight are of regional importance. Assessment of these monuments concluded the proposed development will not impact upon their settings, and this conclusion extends to the</p>

There is no overriding public interest in the present application that would justify the degradation of this landscape and the violation of several international agreements binding on the UK, ignoring the broader democratic consensus which includes the local community, the local government (FODC) and statutory bodies such as the Loughs Agency. The economic arguments of the application are not sufficiently robust, there is no social license to operate, and the attempt by the Applicant to add critical minerals to the list when they were not included in the original application means that they cannot be taken seriously. There are several inconsistencies in the Applicant's supporting documentation. Assessments have downplayed the significance of the multiple designations and have not considered cumulative impact.

potential cumulative impact when considering other developments in the area.

The assessment of the impact on the setting of these monuments 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.

The impact on the setting of the monuments has been assessed against these criteria and in all cases, it has been found that there is no individual or cumulative impact on their settings. Key factors in this in relation to the regionally important monuments are the lack intervisibility between them and the development, the distance from the development, and the no-change situation in terms of the inter-relationship between the monuments. Key factors in relation to locally important monuments include the lack of upstanding remains, intervisibility with the development and distance from the development.

The ES chapter sets out a methodology that is comparable to standards established in the ICOMOS 2011 and 2022 guidance. Table 4 of the document sets out the definitions for definitions for severity of change using terminology similar to that contained within paragraph 5.7 of ICOMOS 2011. The following table (table 5), forms a significance of effects matrix which is based on the table set out on pages 9 and 10 of the ICOMOS 2011 document. The assessment on the impact on the identified heritage assets within the search area was conducted using the parameters set out in these table s and is consistent with ICOMOS guidance.

The 2022 guidance includes detail on intangible heritage. This aspect of the assessment is addressed through the analysis of setting and historical context of regionally important monuments and follows the guidelines set out by the HED document: Guidance on Setting and Historic Environment and the principles contained within CiFA, 2021 Principles of Cultural Heritage Impact Assessment in the UK.

*The assessment carried out by RPS on behalf of the Applicant uses an outdated methodology and concept of cultural heritage. It relies in large part on the International Council of Monuments and Sites (ICOMOS) (2011) guidelines to determine the methodology applied to its assessment of the cultural heritage. However, these guidelines were updated and replaced in 2022 to reflect the evolving legal understanding of cultural heritage and its link with human rights and community participation.³ **The methodology relied on in the Applicant's SoC is therefore outdated and does not reflect contemporary best practice.***

Cultural Heritage Impact Assessments (CHIA) addresses intangible cultural heritage and the wider cultural landscape. While the assessments may not use the specific terminology referenced in the Council of Europe Landscape Convention, they have considered the relevant themes—including the relationship between communities and their experience of the cultural landscape.

The assessments recognise and evaluate aspects that fall within the scope of intangible cultural heritage, and these elements are integrated into the analyses of setting and historical context. The assessments also discuss how the proposed development may influence the character and

The Cultural Heritage Impact Assessments undertaken by Gahan and Long and RPS do not include any consideration of the intangible cultural heritage (including ethnography, folklore, associative heritage), or the impact of the application on the wider cultural landscape and its importance for well-being and local peoples' sense of place: footnote 5 is the Council of Europe Landscape Convention, Preamble

Intangible assets – the UNESCO Convention

perception of the wider heritage landscape, which contributes to local sense of place.

The methodologies used in the reports align with accepted professional standards for cultural heritage assessment, which incorporate both tangible and intangible dimensions, even when not explicitly labelled as such.

The Impact assessment does not mention the convention as it was only ratified in 2024; several years after the assessment was conducted.

The Convention defines intangible assets as “*intangible cultural heritage*” means the practices, representations, expressions, knowledge, skills – as well as the instruments, objects, artefacts and cultural spaces associated therewith – that communities, groups and, in some cases, individuals recognize as part of their cultural heritage. This intangible cultural heritage, transmitted from generation to generation, is constantly recreated by communities and groups in response to their environment, their interaction with nature and their history, and provides them with a sense of identity and continuity, thus promoting respect for cultural diversity and human creativity. For the purposes of this Convention, consideration will be given solely to such intangible cultural heritage as is compatible with existing international human rights instruments, as well as with the requirements of mutual respect among communities, groups and individuals, and of sustainable development.

2. The “*intangible cultural heritage*”, as defined in paragraph 1 above, is manifested inter alia in the following domains:

(a) oral traditions and expressions, including language as a vehicle of the intangible cultural heritage;

(b) performing arts;

(c) social practices, rituals and festive events;

(d) knowledge and practices concerning nature and the universe;

(e) traditional craftsmanship.

The assessments specifically recognise and evaluate aspects that fall within the definition of intangible assets relating to “*objects, artefacts and cultural spaces associated therewith*”. These are specifically addressed when assessing the impact on the setting of regionally important monuments.

In relation to aspects such as folklore or language, the ability to appreciate and enjoy these is in no way altered by the proposed development. These are aspects of life which as the Convention states, are “transmitted from generation to generation”. The proposed development does not alter this ability to pass these traditions on, it does not prevent the continuing practice of traditional craftsmanship, does not inhibit the ability to speak a chosen language and does not alter the nature of folklore or mythology.

The assessments produced go beyond an assessment of what can be “*measured, and mitigated against via excavation or removal*”. The assessment and subsequent mitigation strategy as described in the third party comments relate only to non-designated features and potential sub-surface deposits within the infrastructure site. The assessment conducted on these issues is consistent with the current standards and the mitigation strategy reflects the standard practices adopted throughout Northern Ireland for the identification and recording of archaeological features/deposits.

The assessment on the impact on the settings of monuments of regional importance looked at their role and sense of place within the wider historical environment and the inter-relationship between them.

Cultural heritage was erroneously construed in the assessment process as discrete, physical heritage, something that can be enumerated, measured, and mitigated against via excavation or removal, separate from social and cultural impact. However, this is at odds with the current legal understanding of cultural heritage and landscape, as well as the current methodology for conducting cultural heritage impact assessment: footnote 6 is [REDACTED], 'Cultural Heritage Impact Assessment for Development Projects', The Routledge Handbook of Heritage and the Law, Routledge, 2024, pp. 249-262.

The SLR report is not referenced in any of our reports. When conducting our assessment, we started from scratch and established our own baseline based on a standard methodology that we have utilised for EIA production and which is accepted by HED. The SLR work was centred on the location of an exploration tunnel on the Camcosy Road, whereas ours is focused on the infrastructure site. SLR also developed different criteria for their baseline. The fact that they used a different search criteria and larger search area does not mean that our assessment has been conducted to a lesser or incomplete standard. That is unfair.

The red line boundary for the site does extend into the ASAI, however this only relates to the below ground element of the project and not the infrastructure site. The below ground element does not impact on the Beaghmore ASAI. The above ground element has been assessed repeatedly, through the examination on the impact in the setting of regionally important monuments within the search area (Appendix 6 ES chapter) and within section 3.2 of TR15 and section 2.1 of RR15. Further assessment of the impact on the setting of the ASAI has been conducted through the 3D modelling of the infrastructure site from viewpoints identified by MUDC. This is covered in section 3.1 of the RR15, and establishes that the site is not visible from 4 out of the 5 viewpoints. In the one view point where the infrastructure site is visible, it is clear that there is no impact on the setting of the ASAI.

In addition, it is much narrower in archaeological scope than a previous cultural heritage impact assessment carried out by SLR in 2013, which identified 27 cultural heritage sites within the immediate 'project area' and a total of 113 cultural heritage sites with a 6 x 4 km environs. The number of heritage sites involved would appear to contradict the assessment that 'the project will not have any direct impact on heritage assets.' The SLR report is not mentioned in the Applicant's SoC.

1. *The Beaghmore Area of Significant Archaeological Interest (ASAI) now extends to within the application site for LA10/ 2017/1249/F, ⁸ which according to HED (Historic Monuments), warrants further assessment of application LA10/2017/1249/F by HED. It is worth recalling HED's guidance in relation to development in ASAs, which holds that:*

"Generally, it is unlikely that ASAs will be able to accommodate large scale development such as quarrying or mining operations, turbines or wind farms, waste disposal, industrial units or major tourism schemes or proposals for the erection of telecommunications masts or pylons and as it is likely that the overall impact of such proposals could be particularly damaging to the distinct

The CiFA document is not specifically referred to in the assessments, however they have been produced in line with the requirements of it. The assessments include:

The two principles of CHIA and the six analytical stages from which they are formed are:

A. Understanding cultural heritage assets:

1. describing the asset;
2. ascribing cultural significance; and

*appearance, character and historic environment of the area*⁹

[that footnote 9 reads – “Appendix 5— Historic Environment Division (Listed Building and Historic Monuments) LA10/2017/1249/F Archaeology & Built Heritage, HED response: 01 05 24 Section Reference: HB11 17 001, at 5.8”]

In relation to the gold mine site, HED (Historic Monuments) notes in its SoC that “it is located close to a large number of recorded archaeological sites and monuments. These range in date from the Neolithic and Bronze Age periods up until the Post-Medieval period. The distinctive character of this landscape contributes to the intrinsic historic character of the Beaghmore Area of Significant Archaeological Interest (ASAI) and the settings of those archaeological sites contained within it and in the surrounding landscape”.¹⁰ Its SoC goes on to note that “a relative absence of modern development, with no visible large-scale developments, is one of the key landscape characteristics noted in the Beaghmore ASAI designation.”

Cultural heritage has a much broader legal meaning and now incorporates intangible heritage and cultural landscape, recognised in multiple international instruments, including the UNESCO 1972 World Heritage Convention (“Cultural Landscapes”),¹⁵ the 2003 UNESCO Convention on the Safeguarding of the Intangible Cultural Heritage (Article 2),¹⁶ and the 2000 Council of Europe Landscape Convention (Article 1).¹⁷ The intangible cultural heritage and importance of landscape for

3. attributing importance.

B. Evaluating the consequences of change:

1. understanding change;

2. assessing impact; and

3. weighting the effect

CiFA, 2021 Principles of Cultural Heritage Impact Assessment in the UK- summary- page14

well-being is not only recognised in the main reference texts of international cultural heritage law but also in the most up-to-date guidance in the UK and Ireland, as evidenced in 'Principles of Cultural Heritage Impact Assessment in the UK', which recognises that "Cultural heritage connects people with place and includes the associations that can be seen, felt and heard. It is a source of memories and associations, and an inspiration for learning and creativity. Cultural heritage contributes to individual, community and national identity as well as our well-being and economic prosperity".¹⁸ Transport Infrastructure Ireland's Guidelines for conducting Cultural Heritage Impact Assessment also includes intangible cultural heritage and landscape

Pg. 21	<p>"The mine application site overlaps with the Beaghmore Area of Yes Significant Archaeological Interest (ASAI). According to HED (Historic Monuments): "Generally, it is unlikely that ASAs will be able to accommodate large scale development such as quarrying or mining operations... as it is likely that the overall impact of such proposals could be particularly damaging to the distinct appearance, character and historic environment of the area.""</p>	<p>TR15 section 3.2 (page 3) RR15 section 2.1 (pages 2-3)</p>
Pg. 22	<p>"A recent and relevant decision by the Planning Appeals Commission is that of the Doraville Wind Farm, proposed also for the Sperrin Mountains. The PAC recommended the planning application be refused, with a material consideration being 'dinnseanchas' - "meaning the spirit of a place, which results from interactions of natural and human processes over time." In the decision they draw on the 2015 Northern Ireland Regional Landscape Character Assessment (NIRLCA), where they state that this concept should be a 'prime consideration' for 'substantial development' projects in an area which includes the Sperrin Mountains. The PAC concludes in the Doraville case: "Whilst the landscape must be viewed as a dynamic entity, the scale of this proposal</p>	<p>No</p> <p>The Objector document places a lot of emphasis on the importance of the historic landscape in relation to people's sense of place. The Objectors identify much of this landscape as being the area of Muinir Luinigh which is centred on the Crouck Td and encompasses much of the Owenkillew Valley. Particular reference is made to Dún Ruadh and the Ogham Stone of Aghascríobach. This area is clearly an historic landscape (it is in the ASAI). The impact on the setting of this landscape has been assessed through analysis of individual monuments and identified (by the Local Planning Authority) critical viewpoints. When dealing with the monuments, the assessment has been conducted using the guidance set out in the Historic Scotland document - "EIS Scoping of Wind Farm Proposals, Assessment of the Impact on the Setting of the Historic</p>

and the magnitude of change that it would affect thereon has the potential to detract from local peoples' sense of place and connection to the land."""

Environment Resource, Some General Considerations" and revisited using the HED publication: 'Guidance on Setting and the Historic Environment'. Both these documents provide parameters to address in making the assessment. This includes the sense of place of the individual monument, its relationship in the local and wider landscape, its relationship with other monuments, and their collective contribution to the understanding of the historic landscape. These factors combine to provide the sense of place of a historic landscape. The assessments have demonstrated that the development site will not significantly impact on these aspects of the historic landscape and there will be no change to its sense of place.

The PAC Doraville report states "The NIRLCA acknowledges local identity and "dinnseanchas" as material considerations. Whilst the landscape must be viewed as a dynamic entity, the scale of this proposal and the magnitude of change that it would affect thereon has the potential to detract from local peoples' sense of place and connection to the land".

However the PAC reasoning provided for the refusal on the basis of cultural heritage is given as "It would have an adverse impact on the integrity of the setting of a Scheduled MiSC, two associated Scheduled Monuments and that of an archaeological remain of local importance. There are no appropriate mitigation measures that would reduce these impacts. This would potentially be contrary to Policies BH 1 and BH 2 of PPS 6 and criterion (c) of Policy RE 1 of PPS 18".

The applicant development site does not impact on regionally or locally important monuments as demonstrated by the assessments conducted to date and as such it is my conclusion that it complies with planning policy.

Pg. 22-23	<p>"Furthermore, we note that the subject site is located in close proximity to an area designated within the Fermanagh and Omagh District Council Local Development Plan 2030 as the 'Beaghmore Area of Significant Archaeological Interest'. The Historic Environment Division's map viewer reveals a cluster of significant monuments to the north and east of the application site, many of which may be protected under the Historic Monuments and Archaeological Objects (NI) Order 1995 and listed on the Scheduled Historic Monuments list for Co. Tyrone¹⁷ Insights from community submissions reveal that the site may comprise an ancient route known as the Green Road and the site of the Battle of Formil. Local knowledge is an important repository of heritage information and perceived value which should be taken into account by the planning authority, even if monuments likely to be disturbed by the mining proposal are not legally scheduled.</p> <p>Overall, introducing an intensive mining facility into this location would disturb the archaeological interest of the region and impede community amenity in this respect when seeking to interact with local monuments. These monuments also contain all-island cultural and heritage significance. The planning authority requires full consideration of the landscape-level heritage value of this region, for NI and the wider island, and how the proposed mining development may hinder this. We recommend consultation with the Historic Environment Division (HED) to determine the full extent of heritage impacts."</p>	Yes	<p>ES section 3.5 (pages 16-17), section 3.6 (page 20)' Appendix 6 (pages 66-73) TR15, section 3.2 (page 30, 4.2 (page 4) RR15 section 2.1 (pages 2-3)</p>
Pg. 20	<p>In 2003, the International Mining Council agreed to a 'no-go' ban on mining in World Heritage Sites and agreed to respect designated protected areas, recognizing the damage of mining on such sites. "ICMM believes that mining in World Heritage Sites is not compatible with biodiversity conservation: the costs outweigh the benefits. ICMM also believes that all protected areas need to be managed carefully to prevent the irreversible loss of those values." This acknowledgment from the industry itself on the incompatibility of mining with important heritage</p>	No	<p>There are no world heritage sites affected.</p>

sites should be carefully considered in light of the Sperrins landscape.

TBA0012; 0016; 0022; 0025; 0026; 0039; 0055; 0059; 0071; 0076; 0084; 0094; 0102; 0111; 0131; 0136; 0139; 0147; 0166; 0177; 0198; 0203; 0207; 0211; 0218; 0224; 0237; 0249; 0253; 0258; 0265; 0271; 0287; 0301; 0400; 0409; 0415; 0436; 0443; 0449; 0453; 0454; 0459; 0479; 0484; 0488; 0494; 0503; 0511; 0513; 0516; 0520; 0526; 0530; 0534; 0547; 0551; 0557; 0562; 0576; 0580; 0609; 0612; 0618; 0627; 0642; 0649; 0658; 0664; 0668; 0673; 0678; 0687; 0695; 0701; 0705; 0714; 0718; 0721; 0731; 0754; 0764; 0793; 0796; 0807; 0819; 0822; 0826; 0827; 0835; 0843; 0856; 0860; 0861; 0865; 0879; 0883; 0887; 0891; 0896; 0900; 0913; 0919; 0924; 0946; 0947; 0952; 0956; 0961; 0969; 0972; 0974; 0975; 0999; 1004; 1009; 1012; 1025; 1033; 1041; 1044; 1058; 1066; 1079; 1082; 1091; 1098; 1103; 1109; 1124; 1128; 1132; 1136; 1151; 1155; 1161; 1175; 1184; 1187; 1191; 1224; 1232; 1249; 1252; 1283; 1291; 1320; 1324; 1337; 1640; 1342; 1345; 1361; 1362; 1371; 1380; 1393; 1396; 1403; 1434; 1441; 1454; 1459; 1473; 1483; 1505; 1508; 1511; 1516;

the assessments conducted have assessed the sense of place of the wider historic landscape surrounding the application site. The principle historic landscape is that contained within the Beaghmore ASAI. The impact on the setting of this landscape has been assessed through analysis of individual monuments and identified (by the Local Planning Authority) critical viewpoints. When dealing with the monuments, the assessment has been conducted using the guidance set out in the Historic Scotland document - "EIS Scoping of Wind Farm Proposals, Assessment of the Impact on the Setting of the Historic Environment Resource, Some General Considerations" and revisited using the HED publication: 'Guidance on Setting and the Historic Environment'. Both these documents provide parameters to address in making the assessment. This includes the sense of place of the individual monument, its relationship in the local and wider landscape, its relationship with other monuments, and their collective contribution to the understanding of the historic landscape. These factors combine to provide the sense of place of a historic landscape. The assessments have demonstrated that the development site will not impact on these aspects of the historic landscape and there will be no change to its sense of place.

1517; 1530; 1531; 1532; 1534;
1536; 1543; 1551; 1554; 1561;
1569; 1570; 1580; & 1590

Pg. 1-2	<p>"Historical records show that the Sperrin Mountains were one of the first populated areas on the island. There is a wealth of archaeological sites in the area, more than 100 in an 8 mile radius, dating back to various ages. One site of note in the designated ASAI (Area of Significant Archaeological Interest) is the six thousand year old Beaghmore Stone Circles - one of the largest and most complex sites of its kind.</p> <p>These important sites, shared and valued by all on this island are at risk from the proposed plans. Beyond just discrete monuments, these sites are part of a dynamic and living social landscape that is central to connections to place and cultural identity."</p>	No	<p>The Sperrins cannot be one of the first populated areas in Ireland. The "6000 year old Beaghmore Stone Circles" placing it approximately 3,000-4,000 years later than the evidence for the first human settlement.</p>
Pg. 2	<p>In terms of Celtic history, the proposed mine site cuts across the historic Green Road - the road that Hugh O'Neill travelled with other Celtic Chiefs in 1607 on their way to Rathmullan in Donegal, as part of the Flight of the Earls. The proposal to abandon a stretch of the public road and grant it to the goldmining company is totally unacceptable as it is a much used accessible and multifunctional road for both locals and the public. The proposal by the Department to grant Dalradian Gold's application to have the roadway abandoned is made all the more unacceptable because the road is connected to this ancient and historic Green Road and also because it is the access roadway for people and pilgrims visiting the Mass Rock which dates back to Penal times (1691 - 1760), when the local population's religious rights were denied and had to be exercised in secret. In 2017 a nearby sacred statue of the Blessed Virgin Mary, to which people come from across the country on pilgrimage, was defiled by pro-mining elements, since then more people have been coming on pilgrimage and as support for the rejection of the mine has grown.</p>	Yes	<p>Green Road: EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3)</p> <p>It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the "historic road" was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED] and Professor [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).</p> <p>Mass Rock: EIA- section 2.1 (page 7), section 2.10 (page 12) TR15- section 8, table 2 (page 10) RR15 – section 2.2 (page 3)</p>

Pg. 2	<p>Dalradian Gold’s assessment of the negative impacts on cultural heritage has failed totally to address these matters and the connectedness of people to place and to culture in Muintir Luinigh and throughout the wider Sperrins. The failure of Dalradian’s impact assessment to identify the reality of a region so rich in a vibrant cultural tradition of language and heritage with stories and histories of important cultural figures who have shaped Ireland today, is remarkable. Dr [REDACTED] (2024) points out significant shortcomings in Dalradian Gold’s assessment of cultural heritage, “In the overall circumstances the definition of ‘cultural heritage’ as employed in the report seems excessively narrow. It certainly does not meet the definition set out by UNESCO.” For instance, Padaí Láidir Mac Culadh is featured in the National Museum of Ireland, as a master craftsman who could fashion a horse harness and saddle out of straw. Padaí Láidir Mac Culadh, Eoin Ó Cianán, Peadar Joe Ó hEachaidh, Seán Ó Cairealláin and more than 20 other native Irish speakers were all well known Gaeilgeoirí, and are included in various books eg. "Padaí Láidir Mac Culadh agus Gaeltacht Thír Eoghain", "Tyrone Folkquest," & "Scéalta Muintir Luinigh."</p>	Yes and No	<p>Muintir Luinigh: RR15 - section 3.2 (pages 5-8)</p> <p>Language, Famous people etc: The project cannot alter the language or the achievements/historical significance of people</p>
Pg. 2	<p>The Sperrin Mountains was known as a Gaeltacht area where both ‘indigenous’ and ‘planter’ populations spoke Irish as their native language up until the 1950s. Despite the decline in the language, as with the rest of the island, there has been a recent revival and now the language is thriving. The Sperrins represent a focal point in language reclamation on the island due to the strong sense of connection to place. Greencastle, Co. Tyrone, where the resistance site is based, is still known locally by its Irish name - Sheskinshule, which means ‘moving bog’. Thus, local people know that Greencastle, Sheskinshule, is not a suitable place for a water intensive goldmine. All the townlands have names either in Irish or from Irish, generally describing the associated landscape. The aliveness of the Irish language in this area highlights the relational interaction with place and a sense of an entwinement and intimacy with the land, common with</p>	No	<p>The project cannot alter anyone’s use of language</p>

	many indigenous languages globally. This shows the stark contrast in worldview between local community and extractive industries.		
Pg. 3	With an “Irish Language Revival” taking place across the island, attention should be given to the impacts of this proposal on an important place where the language has persisted and resisted.	No	The project cannot alter anyone's use of language
Pg. 3	Many people who live in the area are descendants of families who have lived in the Sperrins for generations. They are immersed in their culture, their heritage and sense of Irishness. They view this goldmining application as an attack on their identity and all they hold dear. They are greatly concerned for the future of their children and grandchildren. This strength of feeling is reflected in the huge number of objections lodged against the goldmining application and the existence of several anti-mining groups across the Sperrins. The Rights of Communities should be respected and the people of the Sperrins have loudly said no to goldmining.	No	This is a continuation of the points above
TBA0143 - Pg. 1	The mine threatens ancient archaeological sites, irish language heritage and the natural beauty of the Sperrins, which is important to people across Ireland.	Yes and No	Archaeological sites: EIA- section 3.5 (pages 16-18), section 3.6 (page 20) TR15- section 4 (pages 3-4), section 6 (page 6-7), section 9 (page 10) Language The project cannot alter anyone's use of language
TBA0243 - Pg. 1-2	The Sperrin Mountains are of profound cultural significance, encompassing ancient archaeology, mythology, Irish Language traditions, sacred pilgrimage routes and rich intangible heritage. These are not merely relics of the past but living expressions of identity, memory and belonging.	No	The assessments conducted have assessed the sense of place of the wider historic landscape surrounding the application site. The principle historic landscape is that contained within the Beaghmore ASAI. The impact on the setting of this landscape has been assessed through analysis of individual monuments and identified (by the Local Planning Authority) critical viewpoints. When dealing with the monuments, the assessment has been conducted using the guidance set out in the Historic Scotland document - “EIS Scoping of Wind Farm Proposals, Assessment of the Impact on the Setting of the Historic Environment Resource,

			Some General Considerations” and revisited using the HED publication: ‘Guidance on Setting and the Historic Environment’. Both these documents provide parameters to address in making the assessment. This includes the sense of place of the individual monument, its relationship in the local and wider landscape, its relationship with other monuments, and their collective contribution to the understanding of the historic landscape. These factors combine to provide a the sense of place of a historic landscape. The assessments have demonstrated that the development site will not impact on these aspects of the historic landscape and there will be no change to its sense of place.
Pg. 2	Reports by ██████████ highlight the internationally recognised cultural landscape of the Sperrins under the 1972 UNESCO World Heritage Convention; 2003 UNESCO Convention for Safeguarding of Intangible Cultural Heritage; and 2000 Council of Europe Landscape Convention	NO	Continuation of point above
Pg. 2	The mine zone falls within an ASAI home to over 100 documented sites, including the Beaghmore Stone Circles.	YES	IA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 2	The site intersets the Green Road, the ancient route travelled by Hugh O’Neill and the Celtic Chiefs during the 1607 Flight of the Earls.	YES	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15– section 2.3 (page 3)
			It is claimed that the historic road was used by Hugh O’Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the “historic road” was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr ██████████ and Professor ██████████ was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).

Pg. 2	The Dfl proposal to abandon a stretch of public road and transfer it to a private goldmining company is unacceptable. This road is still actively used by locals and pilgrims visiting the Mass Rock, a sacred site dating from the Penal Laws era. The significance of this road to cultural, religious and historical identity cannot be overstated.	Yes	Mass Rock: IA- section 2.1 (page 7), section 2.10 (page 12) TR15- section 8, table 2 (page 10) RR15 – section 2.2 (page 3)
Pg. 2	The Sperrins were a Gaeltacht area until the mid-20th Centruy . Today irish is being revived through local schools, community centres and cultural organisations. Language revitalisation here is a direct act of resistance against extractive colonial legacies.	No	The project cannot alter anyone's use of language
TBA0322 – pg. 1	The Sperrins is a vital part of our shared cultural inheritance. Their archaeology, oral histories and deep connection to Irish heritage make the a living archive of who we are. To allow their destruction in the name of gold extraction is, to me, a betrayal of that heritage.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
TBA0412 – pg. 1	The mine threatens ancient archaeological sites and the natural beauty of the Sperrins already saturated with wind turbines.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 1	Threat to irish language	No	The project cannot alter anyone's use of language
TBA0596 – pg. 3	The Sperrins is an area rich in cultural heritage for the whole island, evidenced in the ancient archaeology, historical sites, stories, the irish language and more.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
			The project cannot alter anyone's use of language
Pg. 3-4	There is a wealth of archaeological sites in the area. These important sites, shared and valued by all on this island are at risk from the proposed plans. Beyond just discrete monuments, these sites are part of a dynamic and living social landscape that is central to connections to place and cultural identity	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 4	The proposal to have the roadway abandoned is made all the more unacceptable because the road is connected to this	YES	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9)

	ancient and historic Green Road and also because it is the access roadway for people and pilgrims visiting the Mass Rock.		RR15 – section 2.3 (page 3)
			It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the “historic road” was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED] and Professor [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).
Pg. 4-5	The assessment of negative impacts on cultural heritage has failed totally to address the connectedness of the people to place and to culture in Muintir Luinigh and throughout the wider Sperrins.	YES	RR15- section 3.2 (pages 5-8)
Pg. 5	The Sperrins were a Gaeltacht area until the mid-20th Century . Today Irish is being revived through local schools, community centres and cultural organisations. Language revitalisation here is a direct act of resistance against extractive colonial legacies.	No	The project cannot alter anyone's use of language
TBA0741 – pg. 1	The cultural significance of the Sperrins must not be overlooked. This landscape is deeply rooted in the shared heritage of this island, rich with ancient archaeology, historical landmarks, oral traditions, and connections to the Irish language. It is a landscape of spiritual, historic and cultural importance. The destruction of this environment would result in irreversible harm to our collective legacy.	No	The project cannot alter anyone's use of language
TBA0750 -pg. 1	The Sperrins landscape is one of the most protected on the island. It is renowned for its history and archaeology.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
TBA0751 – pg. 1	This rich cultural, historical, religious and linguistic landscape will take the heart out of it.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)

TBA0775; TBA0987; TBA1465; TBA0630 – pg. 1	The mine threatens ancient archaeological sites, Irish language heritage, and the natural beauty of the Sperrins, which is important to people across Ireland.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
The project cannot alter anyone's use of language			
TBA1019 – pg. 1	A similar application in Co. Mayo where permission was sought to mine for gold under Croagh Patrick. The overwhelming sentiment of the population of Ireland, north and south of the border, was that this would be selling our minerals to the detriment of our natural and cultural heritage.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 1	The Sperrin Mountains are also rich in cultural heritage, archaeology, historical sites, oral history, Irish language and the value we place on owning our land and waters.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15– section 2.1 (page 2-3)
TBA1777 – pg. 1	It is absolutely out of the question that mining should be permitted in an AONB, RAMSAR site, Dark Sky Observatory, ASSI, ASAI and SPA.	YES	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 3	The Sperrins is a land deeply connected to the history and heritage, It is host to many sites of archaeological and religious significance. The Gaeltacht of old is returning, and more and more residents of our island are using the Sperrins to connect with nature, their ancestors and the community around them.	YES and No	EIA, TR15, RR15 The project cannot alter anyone's use of language
TBA1487 – pg. 2	In the beautiful area of the Sperrins any development requires the protection of its AONB status, this requirement particularly so because of its archaeological heritage, its ecological value, its cultural identity, its beauty, its unspoiled nature, fresh air and its tourist potential.	Yes	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 2	Their impact assessment shows no empathy with the vibrant cultural traditions of language and heritage that we will retain	No	The impact assessment was produced as per the scope agreed with HED.

	today. Dr ██████████ (2024) said: 'In the overall circumstances the definition of 'cultural heritage' as employed in the report seems excessively narrow. It certainly does not mee the definition set out by UNESCO. '		
TBA1492 – pg. 8	DGL refuse to acknowledge that their proposal would do huge damage to this historic landscape and putting at risk a historic community, heritage, indigenous irish culture of the people of Muintir Lunigh (See citations in representation.)	Yes	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
TBA1494 – pg. 10	The Sperrin mountains are also rish in Cultural Heritiage for the whole islan, in terms of ancient archaeology, historical sites, stories and the irish language and more. The landscape is very much part of peoples religion, culture, heritage and history, as outline in the Dr ██████████ eport.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 10	It is claimed by local historians that the Sperrins were one of the first populated areas on this island. There is a wealth of archaeological sites in the area, more that 100 in a 8 mile radius.	Yes	The Sperrins cannot be one of the first populated areas in Ireland. The “6000 year old Beaghmore Stone Circles” placing it approximately 3,000-4,000 years later than the evidence for the first human settlement.
Pg. 10	In terms of Celtic History, the site cuts across the Green Road, the road that Hugh O'Neill travelled with other Celtic Kings in 1607 as part of the Flight of the Earls. People also used this road to visit a Mass Rock dating back to Penal Times. A nearby statue of the Blessed Virgin Mary to which people come from across the county on polgrimage, has been defiled since more people have been coming on pilgrimage and as support for the rejection of the mine.	No	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the “historic road” was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr ██████████ and Professor ██████████ was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).

Pg. 11	The region is full of stories of important cultural figures who have shaped Ireland today. Padai Laidir Mac Culadh, Eoin O Cianan, Paeder Joe O hEachaidh, Sean O Caireallain and more than 20 other native Irish speakers were all well known Gaelgeoiri, and are included in various books.	No	The project cannot alter the understanding of the achievements of historic figures.
Pg. 12	The Sperrin Mountains were known as a Gaeltach area up until the 1950's. Despite the decline in the language, there has been a recent revival and now the language is thriving. Greencastle, where the resistance sites are based, is still known locally at Sheskinshul 'moving bog'. The aliveness of the Irish language in this area highlights the relational interaction with place and sense of an entwinement and intimacy with the land, common with many indigenous languages globally (McCarthy et al, 2021). This shows a stark contrast in the worldview between local communities and extractive industries.	No	The project cannot alter anyone's use of language
TBA1496 – pg. 13-15	The Sperrin mountains are also rich in Cultural Heritage for the whole island, in terms of ancient archaeology, historical sites, stories and the Irish language and more. The landscape is very much part of people's religion, culture, heritage and history, as outlined in the Dr [REDACTED].	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 13-15	It is claimed by local historians that the Sperrins were one of the first populated areas on this island. There is a wealth of archaeological sites in the area, more than 100 in an 8 mile radius.	Yes	The Sperrins were not one of the first populated areas in Ireland
Pg. 13-15	In terms of Celtic History, the site cuts across the Green Road, the road that Hugh O'Neill travelled with other Celtic Kings in 1607 as part of the Flight of the Earls. People also used this road to visit a Mass Rock dating back to Penal Times. A nearby statue of the Blessed Virgin Mary to which people come from across the county on pilgrimage, has been defiled since more people have been coming on pilgrimage and as support for the rejection of the mine.	No	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the "historic road" was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED] and

Professor [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).

Pg. 13-15	The region is full of stories of important cultural figures who have shaped Ireland today. Padai Laidir Mac Culadh, Eoin O Cianan, Paeder Joe O hEachaidh, Sean O Caireallain and more than 20 other native Irish speakers were all well known Gaelgeoiri, and are included in various books.	No	The project cannot alter the understanding of the achievements of historic figures.
Pg. 13-15	The Sperrin Mountains was known as a Gaeltach area up until the 1950's. Despite the decline in the language, there has been a recent revival and now the language is thriving. Greencastle, where the resistance sites is based, is still known locally at Sheskinshul 'moving bog'. The aliveness of the Irish language in this area highlights the relational interaction with place and sense of an entwined and intimacy with the land, common with many indigenous languages globally (McCarthy et al, 2021). This shows a stark contrast in the worldview between local communities and extractive industries.	No	The project cannot alter anyone's use of language
TBA1500 - pg. 1	Sperrins Special Area of Conservation is a natural and cultural treasure, rich in cultural heritage for the whole island, evidence in the archaeology, historical sites, stories and Irish language and more. The landscape is part of the people's religion, culture, heritage and history, as outlined in report by Dr [REDACTED]	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15- section 2.1 (page 2-3)
Pg. 1	In terms of Celtic History, the site cuts across the Green Road, the road that Hugh O'Neill travelled with other Celtic Kings in 1607 as part of the Flight of the Earls. People also used this road to visit a Mass Rock dating back to Penal Times. A nearby statue of the Blessed Virgin Mary to which people come from across the county on pilgrimage, has been defiled since more people have been coming on pilgrimage and as support for the rejection of the mine.	No	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 - section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the "historic road" was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED]

Professor [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).

Pg. 1-2	Just completed a Masters in Environmental Psychology studying Yes the responses of local people to proposed environmental threat to the River Boyne. As proper management and respectful treatment of the Sperrins in intertwined with the happiness, well-being and identities of many of the citizens of Omagh, Strabane and the towns and villages in the area, this makes the massive disruption and pollution to this area intolerable and unacceptable. Indeed, this would constitute a significant public health issue for the many thousands who use the area for sport, recreation and psychological restoration.		Not cultural heritage
TBA1537 – pg. 4-8	Flawed cultural heritage impact assessment	No	The impact assessment was produced as per the scope agreed with HED.
TBA1557 - Feminist Communities for Climate Justice – pg. 10- 11	Impact on cultural and archaeological heritage Impact of use of explosives on sub-surface archaeological deposits	No	IA- section 3.5 (page 16), section 2.10 (page 12) TR- section 3.2 (page 3) SOC Rebuttal – section 2.1 (page 2-3) Sub-surface archaeological deposits within an NI context are typically found extending into glacial subsoil to a depth of less than 1m. The site types that are prevalent throughout the development landscape are mainly above-ground type monuments (cairns, tombs, stone circles etc) which will have minimal below surface features. Sub surface features which are likely to be found would consist of infilled pits, cists graves, house slots and may date back thousands of years. Despite their longevity, these site types are inherently robust and are regularly identified during archaeological works. In a NI context, significant archaeological deposits have been identified within or immediately adjacent to working quarry sites, such as at Kilwaughter, Co Antrim and Kennedy Quarry, Co Armagh. Indeed, the Kennedy quarry site contains the regionally important monument ARM 11:12 which has survived intact within the site since quarrying began. The vibration associated with the use of explosives will not impact on the stability of sub-surface archaeological deposits.

TBA1581 - Jesuit Centre for Faith & Justice – pg. 5	The Sperrin Mountains is an area rich in cultural heritage for the No whole island, evidenced in the ancient archaeology, historical sites, stories, the irish language and more. The landscape is part of people's religion, culture, heritage and history as outlined in the report by Dr [REDACTED]	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 5-6	There is a wealth of archaeological sites in the area. These No important sites, shared and valued by all on this island, are at risk from the proposed plans. Beyond just discrete monuments, these sites are part of a dynamic and living social landscape that is central to connections to place and cultural identity.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 6	The proposed mine cuts across the historic Green Road - the No road that Celtic Chiefs travelled as part of the Flight of the Earls. The failure of Dalradian's impact assessment to identify the reality of a region so rich in a vibrant cultural tradition of language and heritage with stories and histories of important cultural figures who have shaped Ireland today, is remarkable.	No	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the “historic road” was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).
Pg. 6-7	The Sperrin Mountains was known as a Gaeltach area up until No the 1950's . Despite the decline in the language, there has been a recent revival and now the language is thriving. The vitality of the Irish language in this area highlights the relational interaction with place and sense of an entwinement and intimacy with the land, common with many indigenous languages globally.	No	The project cannot alter anyone's use of language

TBA1584 – pg. 6	The Sperrin Mountains is an area rich in cultural heritage for the No whole island, evidenced in the ancient archaeology, historical sites, stories, the irish language and more. The landscape is part of people's religion, culture, heritage and history as outlined in the report by Dr ██████████ and Dr ██████████		EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 6-7	There is a wealth of archaeological sites in the area. These No important sites, shared and valued by all on this island, are at risk from the proposed plans. Beyond just discrete monuments, these sites are part of a dynamic and living social landscape that is central to connections to place and cultural identity.		EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 7	The proposed mine cuts across the historic Green Road - the No road that Celtic Chiefs travelled as part of the Flight of the Earls. The failure of Dalradian's impact assessment to identify the reality of a region so rich in a vibrant cultural tradition of language and heritage with stories and histories of important cultural figures who have shaped Ireland today, is remarkable.		EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the “historic road” was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr ██████████ ██████████ was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).
Pg. 7-8	The Sperrin Mountains was known as a Gaeltach area up until No the 1950's . Despite the decline in the language, there has been a recent revival and now the language is thriving.		The project cannot alter anyone's use of language
TBA1585 – pg. 1	The Sperrin Mountains is an area rich in cultural heritage for the No whole island, evidenced in the ancient archaeology, historical sites, stories, the irish language and more. The landscape is part of people's religion, culture, heritage and history as outlined in the report by Dr ██████████		EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 1-2	There is a wealth of archaeological sites in the area. These No important sites, shared and valued by all on this island, are at risk from the proposed plans. Beyond just discrete monuments,		EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)

	these sites are part of a dynamic and living social landscape that is central to connections to place and cultural identity.		
Pg. 2	The proposed mine cuts across the historic Green Road - the road that Celtic Chiefs travelled as part of the Flight of the Earls. The failure of Dalradian's impact assessment to identify the reality of a region so rich in a vibrant cultural tradition of language and heritage with stories and histories of important cultural figures who have shaped Ireland today, is remarkable.	No	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the "historic road" was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).
Pg. 2-3	The Sperrin Mountains was known as a Gaeltach area up until the 1950's . Despite the decline in the language, there has been a recent revival and now the language is thriving.	No	The project cannot alter anyone's use of language
TBA1592 - Centre for Global Education - pg. 5-6	The Sperrin Mountains is an area rich in cultural heritage for the whole island, evidenced in the ancient archaeology, historical sites, stories, the Irish language and more. The landscape is part of people's religion, culture, heritage and history as outlined in the report by Dr [REDACTED] and Dr [REDACTED]	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 6	There is a wealth of archaeological sites in the area. These important sites, shared and valued by all on this island, are at risk from the proposed plans. Beyond just discrete monuments, these sites are part of a dynamic and living social landscape that is central to connections to place and cultural identity.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 6	The proposed mine cuts across the historic Green Road - the road that Celtic Chiefs travelled as part of the Flight of the Earls. The failure of Dalradian's impact assessment to identify the reality of a region so rich in a vibrant cultural tradition of language and heritage with stories and histories of important cultural figures who have shaped Ireland today, is remarkable.	No	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of

			Northern Ireland in relation to the claimed public right of way here, demonstrated that the “historic road” was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED] [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).
Pg. 6-7	The Sperrin Mountains was known as a Gaeltach area up until the 1950's . Despite the decline in the language, there has been a recent revival and now the language is thriving.	No	The project cannot alter anyone's use of language
TBA1597 - Ireland's Think-tank for Action on Social Change – pg. 8	The Sperrin Mountains is an area rich in cultural heritage for the whole island, evidenced in the ancient archaeology, historical sites, stories, the irish language and more. The landscape is part of people's religion, culture, heritage and history as outlined in the report by Dr [REDACTED] and Dr [REDACTED]	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 8	There is a wealth of archaeological sites in the area. These important sites, shared and valued by all on this island, are at risk from the proposed plans. Beyond just discrete monuments, these sites are part of a dynamic and living social landscape that is central to connections to place and cultural identity.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
Pg. 8	The proposed mine cuts across the historic Green Road - the road that Celtic Chiefs travelled as part of the Flight of the Earls. The failure of Dalradian's impact assessment to identify the reality of a region so rich in a vibrant cultural tradition of language and heritage with stories and histories of important cultural figures who have shaped Ireland today, is remarkable.	No	EIA- section 2.1 (page 7), section 3.5 (page 16) TR15- section 8, table 2 (page 9) RR15 – section 2.3 (page 3) It is claimed that the historic road was used by Hugh O'Neill during the Flight of the Earls in 1607. There is no evidence to support this. In addition, evidence presented to the County Court of Northern Ireland in relation to the claimed public right of way here, demonstrated that the “historic road” was constructed within a narrow time frame between 1759 and 1765, some 150 years after the Flight of the Earls. The evidence of Mr [REDACTED] [REDACTED] was accepted by the Court (RR15- Heritage- Appendix 1- PROW Judgement).

Pg. 9	The Sperrin Mountains was known as a Gaeltach area up until the 1950's. Despite the decline in the language, there has been a recent revival and now the language is thriving.	No	The project cannot alter anyone's use of language
TBA0594 – pg. 1	The mine threatens ancient archaeological sites, Irish Language heritage, and the natural beauty of the Sperrins, which is important to people across Ireland.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
TBA1575 – pg. 1	There is a wealth of archaeological sites in the area, one of which is the stone circles ASAI.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
TBA1566 – pg. 9	The mine threatens ancient archaeological sites, Irish Language heritage, and the natural beauty of the Sperrins, which is important to people across Ireland.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
TBA0195 & TBA0341 -pg. 1	There is a wealth of archaeological sites in the area, one of which is the stone circles ASAI.	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)
TBA0005; 0006; 0009; 0014; 0023; 0024; 0030; 0033; 0034; 0036; 0042; 0061; 0062; 0063; 0064; 0087; 0088; 0089; 0090; 0091; 0092; 0093; 0095; 0097; 0098; 0099; 0104; 0105; 0109; 0116; 0117; 0121; 0122; 0124; 0125; 0126; 0127; 0128; 0144; 0145; 0153; 0156; 0161; 0163; 0168; 0169; 0170; 0171; 0172; 0173; 0174; 0175; 0180; 0181; 0182; 0183; 0186; 0188; 0189; 0190; 0191; 0193; 0194; 0197; 0214; 0215; 0221; 0226; 0227;	No	EIA- section 3.5 (page 16), section 2.10 (page 12) TR15- section 3.2 (page 3) RR15 – section 2.1 (page 2-3)	

0228; 0229; 0230; 0232; 0234;
0241; 0260; 0266; 0267; 0268;
0269; 0274; 0275; 0283; 0284;
0293; 0295; 0310; 0315; 0316;
0317; 0318; 0319; 0320; 0321;
0329; 0335; 0336; 0338; 0339;
0340; 0342; 0345; 0352; 0353;
0355; 0359; 0363; 0369; 0371;
0372; 0373; 0385; 0386; 0388;
0394; 0395; 0396; 0398; 0401;
0402; 0403; 0404; 0406; 0408;
0411; 0413; 0413; 0419; 0421;
0424; 0425; 0426; 0427; 0430;
0431; 0432; 0433; 0438; 0446;
0447; 0461; 0462; 0463; 0464;
0465; 0466; 0467; 0468; 0470;
0471; 0473; 0475; 0476; 0496;
0497; 0499; 0500; 0505; 0507;
0508; 0542; 0564; 0565; 0569;
0570; 0582; 0584; 0585; 0586;
0589; 0590; 0591; 0592; 0593;
0595; 0599; 0600; 0601; 0602;
0603; 0604; 0606; 0615;
0620; 0621; 0622; 0628; 0629;
0631; 0632; 0633; 0634; 0635;
0637; 0639; 0644; 0645; 0654;
0655; 0660; 0675; 0680; 0683;
0684; 0685; 0689; 0690; 0691;
0693; 0694; 0698; 0708; 0709;
0710; 0726; 0727; 0729; 0733;
0734; 0736; 0739; 0742; 0743;
0745; 0746; 0748; 0749; 0752;
0753; 0757; 0758; 0768; 0771;
0773; 0774; 0776; 0777; 0778;
0780; 0781; 0782; 0784; 0789;
0790; 0794; 0799; 0800; 0809;

0812; 0828; 0832; 0837; 0839;
0840; 0845; 0857; 0858; 0862;
0863; 0866; 0869; 0873; 0874;
0884; 0902; 0903; 0906; 0908;
0909; 0921; 0925; 0926; 0927;
0928; 0929; 0930; 0933; 0934;
0937; 0938; 0939; 0940; 0941;
0942; 0943; 0944;
0960; 0967; 0968; 0981;
0982; 0983; 0985; 0986; 0990;
0994; 0995; 0996; 1001; 1006;
1007; 1008; 1015; 1016; 1017;
1020; 1027; 1028; 1030; 1034;
1035; 1036; 1037; 1042; 1045;
1046; 1050; 1051; 1052; 1053;
1054; 1059; 1060; 1063; 1065;
1068; 1069; 1070; 1086; 1087;
1092; 1093; 1094; 1105; 1106;
1112; 1114; 1115; 1118; 1119;
1120; 1121; 1135; 1138; 1141;
1142; 1143; 1144; 1157; 1160;
1165; 1168; 1169; 1170; 1171;
1172; 1178; 1181; 1183; 1193;
1195; 1198; 1199; 1202; 1203;
1205; 1210; 1212; 1213; 1214;
1215; 1216; 1217; 1219; 1220;
1221; 1228; 1229; 1234; 1235;
1236; 1237; 1238; 1239; 1240;
1248; 1262; 1263; 1270; 1272;
1276; 1277; 1278; 1279; 1280;
1285; 1293; 1298; 1302; 1305;
1306; 1307; 1310; 1316; 1326;
1328; 1330; 1348; 1350; 1353;
1354; 1356; 1364; 1366; 1367;
1368; 1373; 1374; 1375; 1376;
1383; 1390; 1400; 1403; 1405;

1407; 1409; 1412; 1413; 1416;
1418; 1419; 1420; 1425; 1426;
1430; 1431; 1436; 1437; 1438;
1443; 1444; 1445; 1449; 1450;
1451; 1455; 1456; 1461; 1463;
1464; 1467; 1468; 1470; 1475;
1477; & 1478 - pg. 1

TBA1548 (UCD) – Pg. 6 /7

The cultural heritage impact assessments undertaken by Gahan & Long and RPS use outdated methodology and do not include any consideration of the intangible cultural heritage (including ethnography, folklore, associative heritage), social impact, or the impact of the application on the wider cultural landscape and its importance for well-being and local peoples' sense of place. In addition, it is much narrower in archaeological scope than a previous cultural heritage impact assessment carried out by SLR in 2013, which identified 27 cultural heritage sites within the immediate 'project area' and a total of 113 cultural heritage sites with a 6 x 4 km environs. The number of heritage sites involved would appear to contradict the assessment that 'the project will not have any direct impact on heritage assets'. The SLR report is not mentioned in the Applicant's SoC. The assessment carried out by RPS on behalf of the Applicant relies in large part on the International Council of Monuments and Sites (ICOMOS) (2011) guidelines to determine the methodology applied to its assessment of the cultural heritage. However, these guidelines were updated and replaced in 2022 to reflect the evolving legal understanding of cultural heritage and its link with human rights community participation. The methodology relied on in the Applicant's SoC is therefore outdated and does not reflect contemporary best practice.

No

The SLR report focused on a different site. Its use of a larger search area is irrelevant in the assessment of the impact on archaeological monuments in the area. The number of monuments identified has no direct bearing on the level of direct impact upon them- monuments are either directly impacted or they are not. The impact assessment produced by Gahan and Long was done so as per the scope agreed with HED. The search area within it was more than sufficient to establish the direct impact on archaeological monuments and the indirect impacts on the setting of the wider historical landscape.