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## 10 Cultural Heritage

### 10.1 Executive Summary

1. An assessment of the impact on cultural heritage assets has been undertaken for an area within 500m of the centre line of the proposed Tyrone - Cavan Interconnector to include consideration of direct physical effects during construction, as well as indirect effects during operation on the settings of designated assets within 5km of the proposed Tyrone - Cavan Interconnector. Due to the short duration of construction works, impacts on the setting of heritage assets in the construction phase were scoped out as they are not considered to be significant because of the scale of impacts and their temporary nature.
2. During construction there will be no physical impacts to any recorded heritage assets, resulting in a neutral impact. An archaeological watching brief will be maintained during all topsoil and subsoil removal to ensure that any previously unrecorded archaeological remains will be appropriately excavated and recorded. Construction phase effects on the setting of heritage assets are not considered to be significant.
3. During the operation of the proposed Tyrone - Cavan Interconnector there will be impacts upon the setting of 15 heritage assets, including listed buildings and Scheduled Monuments. Of these, five are moderate adverse, while the remainder are slight adverse. The moderate adverse effects are on the gate lodge to Tullydowey House, Rawes Fort, two further raths and Mullan Fort. There are no appropriate mitigation measures to reduce effects upon the setting of heritage assets.
4. As stated in the Statement of Case, PPS 6: Planning, Archaeology and The Built Heritage (PPS 6) policy BH1 (preservation of archaeological remains of regional importance) and policy BH 2 (protection of archaeological remains of local importance) only permit development proposals that would adversely affect such sites in “*exceptional circumstances*” (BH 1) and where “*other material considerations outweigh the value of the remains in question*” (BH 2). The impacts on historic parks, gardens, demesnes of specialist historic interest (BH 6) have been assessed as being of slight adverse impact on the Argory garden. No demesnes will be oversailed by the proposed Tyrone – Cavan

Interconnector. As stated in the Statement of Case, this impact must be balanced against the overriding national and regional need for the proposed Tyrone – Cavan Interconnector. The impacts of the proposal upon the setting of No.39 Tullydowey Road and other sites of archaeological interest discussed in Consolidated ES Volume 2 Chapter 12 are therefore a matter that must be balanced by the decision maker, but, as stated in the Statement of Case, in terms of scale of impacts assessed those impacts are outweighed in policy BH 1, BH 2, BH 6 and BH 11 terms by the overriding national/regional need for the proposed Tyrone – Cavan Interconnector.

## 10.2 About the Authors

5. The Cultural Heritage assessment of the proposed Tyrone - Cavan Interconnector was undertaken by an AECOM specialist, Mrs Helen Maclean. Mrs Maclean will be supported in giving evidence by Mr Dawson Stelfox.
6. Mrs Maclean has a degree in Archaeology and a Masters in Scientific Methods in Archaeology. She is a full Member of the Chartered Institute of Archaeologists. She has over sixteen years of experience in archaeology. Since 2001 she has worked as an archaeological consultant with AECOM.
7. Mrs Maclean is a technical director for AECOM. She is involved in a wide range of projects, and has acted as Project Archaeologist on a number of large schemes in Northern Ireland such as the A6 Claudy to Dungiven Roads Scheme. Her scheme experience is wide ranging from small development schemes to large linear projects. These have included numerous assessments of power lines. Her clients include government agencies, local authorities and private clients.
8. Mr Stelfox is an Accredited Conservation Architect (AABC and RIAI Grade 1) and Director of Consarc Design Group Ltd. He has over thirty years' experience in repairing and restoring historic buildings, carrying out appraisals and surveys and recording the built heritage. This includes six years' service on the Historic Buildings Council, the statutory body responsible for advising the Historic Environment Division (HED, formerly NIEA) on listing criteria and practice, and undertaking listed building assessment and survey work for HED and the Department of Heritage and Local Government in Ireland. Completed projects include some of Northern Ireland's most important listed buildings

including Parliament Buildings, Belfast City Hall, the Ulster Hall, the Albert Clock, Christchurch, St Malachy's church and Queen's University. He has also acted as an expert witness in a large number of Planning Appeals and legal cases, in the fields of architectural practice and built heritage conservation. He is a former member of the Historic Buildings Council (the Advisory body to Government) and is currently Chair of the RIBA Conservation Accreditation Steering Group which oversees the accreditation of architects in built heritage conservation across the UK.

### 10.3 Policy and Guidance Informing Assessment

9. Policy and guidance information is contained in the Consolidated ES, Chapter 12 – Cultural Heritage (pages 391-392) and the Statement of Case that has been prepared for the proposed Tyrone – Cavan Interconnector.

### 10.4 Summary of Documents

10. This technical report summarises and incorporates by reference the content of the documents submitted in support of the planning applications for the proposed Tyrone - Cavan Interconnector in respect of cultural heritage.
11. For clarity the relevant documents are summarised in Table 10.1.

Table 10.1 Relevant Documents to Cultural Heritage

Consolidated ES	Consolidated ES Addendum
Chapter 12, Cultural Heritage (pages 390-414)	Section 6.7 – Page 82-83 Transboundary Assessment.
Volume 3 Appendices Part 4 including: Appendix 12A – Cultural Heritage Features; Appendix 12B Criteria for Impact Significance; Appendix 12C Ulster Museum Records; Appendix 12D Aerial Photographs; Appendix 12E Cultural Heritage Features within Wider Study Area; and Appendix 12F Built Heritage.	Figure 12.15 Transboundary Cultural Heritage Sites
Abbreviations and Terms, and Bibliography (Pages 682 – 691).	

12. This technical report must therefore be read in conjunction with the Consolidated ES and its Addendum, and not as a standalone document.

13. In a general sense all EIA documents are interrelated and, particularly with respect to the interaction of impacts, all the EIA documents would be relevant. For clarity the documents the authors consider to be the key documents are summarised above. The reader should form his or her own view on what documents within the Consolidated ES and its Addendum are relevant, and key, to the topic under consideration.
14. In the interest of readability these documents are not reproduced in full in this technical report.

### 10.5 Scope of Assessment

15. The Cultural Heritage impact assessment presented in Chapter 12 of the Consolidated ES (pages 407-412) considered potential physical impacts on heritage assets and the potential effects on the setting of heritage assets during both construction and operation.
16. No specific statutory consultee responses were made in relation to the scope of the cultural heritage assessment.
17. Further details are provided in Chapter 12 of the Consolidated ES, Section 12.2.1 ('Scope of the Assessment', Paragraphs 5-8).

### 10.6 Consultation Responses

18. Comments received from NIEA: Built Heritage Unit and Historic Monuments Unit (now known as HED) prior to the submission of the Consolidated ES have all been addressed. Further details are provided in the Consolidated ES in Chapter 6 (Scoping and Consultation).
19. Following submission of the Consolidated ES, HED: Historic Monuments Unit confirmed that they were "content with the proposal". This was contained within the response from the Department of the Environment, dated 20 August 2015 (reference: SM11/2 ARM 7, 11, 12, 15 16, 19 & TYR 61, 62). No further specific comment has been received from HED: Built Heritage Unit, although the Department of the Environment response states that it covered both archaeology and built heritage.

## 10.7 Methodology and Surveys

20. This is a summary of the information contained in the Consolidated ES, Chapter 12 – Cultural Heritage (pages 391 – 395).
21. Two study areas were utilised for the assessment on cultural heritage. An immediate study area was made up of an area of 500m either side of the centre line of the proposed Tyrone - Cavan Interconnector to gain an understanding of the nature of the surrounding archaeological landscape, to enable direct physical impacts to be assessed. The wider study area comprised an area of 5km from the proposed Tyrone - Cavan Interconnector to enable impacts upon the setting of heritage assets to be assessed. Further details are provided in the Consolidated ES, Chapter 12, Section 12.2. An extended 7km transboundary study area was requested by the Department of Environment, following a consultation response from Monaghan County Council, in a Regulation 15 request in October 2010, and this area was utilised for the transboundary assessment.
22. A walkover survey of all accessible areas of the proposed Tyrone - Cavan Interconnector was undertaken, along with site visits to allow impacts upon the setting of heritage assets to be assessed.

## 10.8 Assessment Overview

23. This is a summary of the information contained in the Consolidated ES, Chapter 12 – Cultural Heritage (pages 407 – 413).
24. In 2013 a Consolidated ES was produced. The Cultural Heritage Assessment examined the potential impacts of the scheme during construction and operation of the proposed Tyrone – Cavan Interconnector. The assessment included consideration of archaeology, historic buildings and historic landscapes.
25. The baseline conditions were collated from the Monuments and Buildings Record, including the Sites and Monuments Record, the Industrial Heritage Record, and the Northern Ireland buildings database; the Ulster Museum; documentary sources; historic mapping; aerial photography; and a site walkover survey.
26. No direct (physical) impacts on known cultural heritage sites are anticipated during the construction phase. No recorded archaeological sites will be directly impacted by the

proposed tower locations. There is one asset, a lodge identified from early 20<sup>th</sup> century mapping, recorded within the footprint of the substation but there will be a neutral effect upon this. As no topsoil removal is required for the construction of access tracks, access track construction will not impact upon any archaeological sites. In a number of areas, undergrounding of existing overhead services will be required. None of these affect any recorded archaeological sites.

27. Although no recorded sites will be directly affected, the potential remains for previously unrecorded sites to be located during construction.
28. Assessment of effects on the setting of heritage assets indicated that there are 15 heritage assets within both the immediate and wider study areas which will have their setting affected during operation of the proposed overhead line and towers. These are listed in Table 12.5 of Chapter 12 (Cultural Heritage) of the Consolidated ES (page 409).
29. There will be no impacts on archaeology and cultural heritage during maintenance of the towers or overhead line.
30. There are no identified cumulative or transboundary effects on cultural heritage.
31. The decommissioning of the proposed Tyrone – Cavan Interconnector is assessed in Chapter 1 of the Consolidated ES Addendum (page 5). The effects of decommissioning would be temporary and of a similar scale to or less than the construction phase, as described and assessed in the Consolidated ES. Similar mitigation measures as described for the construction stage in the Consolidated ES should be again implemented to ensure the minimisation or elimination of any environmental impacts, should any additional ground disturbance be required.

## 10.9 Baseline Conditions

32. This is a summary of the information contained in the Consolidated ES, Chapter 12 – Cultural Heritage (pages 395– 407).
33. There are 76 recorded heritage assets within the immediate study area, and there is a low-medium potential for additional archaeological remains to be discovered. These recorded heritage assets include three Scheduled Monuments, which comprise a steep

sided domed mound of uncertain function, Rawes Fort, a rath and souterrain, and another rath known as McNally's Fort.

34. There are six listed buildings within the immediate study area. These are Mullyloughan House listed Grade B and set in formal gardens, and two private residential houses also of Grade B designation. Tullydowey House, set in formal gardens, its associated gate lodge and a private residential house are all Grade B1 listed.
35. The gardens of The Argory represent both formal and more informal grounds, and survive as part of the National Trust property and parkland. The garden is on the Register of Historic Parks, Gardens and Demesnes.
36. There are no State Care Monuments within the immediate study area.
37. Within the wider study area of 5km there are four monuments under State Care, 19 Scheduled Monuments, 32 listed buildings, two entries on the Register of Historic Parks, Gardens and Demesnes of Special Historic Interest, one Conservation Area and one Area of Special Archaeological Interest. The majority of the Scheduled Monuments comprise raths scattered across the landscape, while there are also several forts of Iron Age date. The Area of Special Archaeological Interest is at Navan to the west of Armagh. This area contains a number of the Scheduled Monuments.

#### 10.10 Assessment of Impacts Without Proposed Mitigation

38. This is a summary of the information contained in the Consolidated ES, Chapter 12 – Cultural Heritage (pages 407 - 411).
39. There are no construction effects on any recorded assets by the proposed Tyrone - Cavan Interconnector. The towers have been located to avoid all previously recorded cultural heritage sites. Due to the short duration of construction works, impacts on the setting of heritage assets in the construction phase were not assessed as they are not considered to be significant. Within the footprint of the proposed substation, there is one recorded asset. This is a lodge recorded from early 20<sup>th</sup> century historic mapping. It is not anticipated that any original remains of this lodge survive as the building has been redeveloped to such an extent that the original structure is no longer apparent, and no

historic interest remains, resulting in a neutral effect, even though this structure will be demolished as part of the proposals.

40. Where possible, existing tracks have been incorporated into the proposals. Any new tracks will be constructed on the surface without the need for topsoil removal. Therefore access track construction will not impact upon any archaeological sites. In a number of areas, undergrounding of existing overhead services will be required. None of these affect any recorded archaeological sites.
41. Within Table 12.5 of Chapter 12, five heritage assets were identified as having a moderate adverse effect on their setting as a result of the proposed Tyrone - Cavan Interconnector. These can be seen on Figures 12.1 & 12.3 to 12.5. These comprise:
- Gate Lodge for Tullydowey House (Listed Building Grade B1) (Site 20);
  - Rawes Fort (Scheduled Monument) (Site 65);
  - Two raths (Sites 68 [Scheduled Monument] & 71); and
  - Mullan Fort (Scheduled Monument) (Site 79).
42. Table 12.5 of Chapter 12 also identified the ten heritage assets which would have a slight adverse effect on their setting as a result of the proposed Tyrone - Cavan Interconnector. These comprise:
- 164 and 166 Trew Mount Road (Listed Building Grade B) (Sites 3 & 4);
  - 142 Moy Road (Listed Building Grade B1) (Site 8);
  - Tullydowey House (Listed Building Grade B1) (Site 21);
  - Mullyloughan House/Glenaul House (Listed Building Grade B) (Site 35);
  - Ballydoo enclosure (Scheduled Monument) (Site 80);
  - The Argory (Registered Garden and Listed Building Grade B+) (Site 84 & 84a);
  - Lisglynn Fort (Scheduled Monument) (Site 86);
  - Stone Tower (Listed Building Grade B1) (Site 92); and
  - The Grange (Listed Building Grade B) (Site 93).

43. The gate lodge at Tullydowey House forms a key element in one of the approaches to the main house. As the asset is a gatehouse, it was not designed to have any far reaching views. The overhead line passes directly behind the lodge and a tower is located nearby. While its 'immediate' setting of the entrance, back lane and lands framing the visual connection between the lodge and house will not be affected, its 'secondary' or 'extended' setting is the wider lands and landscape around the house, and it is this that will experience the moderate adverse effect. While the presence of the proposed Tyrone - Cavan Interconnector will not destroy the ability to understand the gate lodge's setting, this ability will be compromised. However, its architectural and historical significance will remain, meaning that its character will survive.
44. Rawes Fort and the two raths survive as relatively well preserved earthworks in prominent positions. When originally constructed the sites were designed to be visible, and were also designed to have far reaching views. The elevated location of the assets gives them views over the surrounding landscape, including the area of the proposed Tyrone - Cavan Interconnector. However, views of the proposed overhead line will be limited by topography and existing vegetation. Although the setting of each of the assets will experience a moderate adverse effect as the integrity of the setting will be compromised, the character of the assets will survive, as will their archaeological significance.
45. Mullan Fort is an artillery fort located on a raised platform of land. Consequently, the asset was designed to have views across the surrounding landscape, and it is also possible that it would have been designed to have been a prominent feature in the landscape and to act as a deterrent. Although the significance of the asset is derived from archaeological and historic information, there will still be partial views of the proposed Tyrone - Cavan Interconnector from the asset. This results in an impact of moderate adverse on the integrity of the setting, which will be compromised but not destroyed. The archaeological and historic character of the asset will not be lost, and it will still be possible to understand the site as an artillery fort.
46. While Tullydowey House, Mullyloughan House/Glenaul House and The Grange would have had some longer reaching views, these only contribute to their significance to a minor extent, as with 142 Moy Road. The setting of 164 and 166 Trew Mount Road does

not contribute to their significance. The impact upon these listed buildings is considered to be slight adverse due to the intervening topography and tree cover. Their architectural significance will remain unaffected. Therefore, the ability to understand these assets and their character will not be lost.

47. While the enclosure may originally have had views across the wider landscape, and would have been visible from the surrounding area, it survives in a much reduced state. Its significance is now primarily derived from its archaeological significance and it will still be possible to understand the asset and its landscape context. Therefore, the impact upon it is slight adverse.
48. The view from the front of The Argory is an important part of the setting of the house, dominated by the River Blackwater and framed by groups of mature woodland. The house is located 1.3km from the proposed substation and 1.4km from the proposed overhead line. As the view already includes significant electricity infrastructure in the middle distance and the proposed line is both further away from and lower in height than existing towers, there will be no more than a slight adverse impact upon it. Parts of the gardens that surround the Argory were designed to be open and allow views out to the surrounding landscape, but, as with the house, the distance from the grounds to the proposed Tyrone - Cavan Interconnector, along with the topography and surrounding tree cover/hedge lines, will limit the impact on the asset. Again, the impact is slight adverse. It will still be possible to understand The Argory and its grounds, and their character will not be lost.
49. Lisglyn Fort survives as an extant earthwork feature on an area of raised ground. It is visible from the surrounding area, and appears to have views over the landscape around it. As a consequence, its setting contributes to its significance. However, while there will be views of the proposed Tyrone - Cavan Interconnector these are only in one direction from the rath. The proposed towers will be located below the level of the skyline and will not therefore become a focal point in views from the asset. In addition, any views of the proposed overhead line and towers would be reduced due to the distance from the asset. Even with the towers in place, it will still be possible to understand Lisglyn Fort and its character, resulting in a significance of impact of slight adverse.

50. The “Stone Tower” is located on an area of high ground overlooking much of the landscape north of Moy. The proposed Tyrone - Cavan Interconnector will be located to the north of the asset, although any views of the overhead line, the towers and the substation will be limited due to the distance between them. It will still be possible to understand the tower and its character. As a result, the impact will be slight adverse.
51. In addition, a number of sites of high value were also included within the assessment due to their public interest. These were all found to have a neutral effect. These are the Ulster Canal, Haughey’s Fort, The King’s Stables, Navan Fort, Navan Area of Special Archaeological Interest, Moy Conservation Area and the Battle of Yellow Ford. Sites in Benburb are also unaffected.

#### 10.11 Proposed Mitigation

52. This is a summary of the information contained in the Consolidated ES, Chapter 12 – Cultural Heritage (pages 411-412).
53. All archaeological mitigation has been agreed with HED (formerly known as NIEA). An archaeological watching brief will be carried out by an appropriately licensed archaeologist during the excavation of the footings and foundations of the towers.
54. Any mechanical excavation will be undertaken using a toothless bucket under archaeological supervision. If archaeological remains or artefacts are discovered, sufficient time will be allowed for an archaeological team to appropriately excavate, clean and record the remains.
55. Although not affected by the proposed Tyrone - Cavan Interconnector, Site 71, a rath, is located close to the stringing location in this area. Therefore a section of the boundary of the proposed Tyrone - Cavan Interconnector will be fenced off during the construction of towers in this location to highlight the location of the rath to construction workers.
56. The setting of heritage assets is largely reliant upon long distance views, and therefore mitigation measures such as screen planting are not appropriate as they would adversely affect the context of the sites. There are no appropriate mitigation measures for impacts to the setting of heritage assets.

57. Mitigation is included within the schedule of environmental commitments (Table 21.1, page 654 of the Consolidated ES). Items 12.1 and 12.2 refer to the requirement to record any previously unrecorded archaeological remains as part of an archaeological watching brief, and the fencing of the rath (Site 71) prior to construction.
58. The consultation response from HED: Historic Monuments Unit requires the agreement and implementation of a developer-funded programme of archaeological works. The conditions require that a Written Scheme of Investigation be prepared for approval by the Department, which should detail the methodology for archaeological work, including the methods by which any identified archaeological remains will be excavated or preserved.

### 10.12 Residual Impacts With Proposed Mitigation

59. This is a summary of the information contained in the Consolidated ES, Chapter 12 – Cultural Heritage (page 412).
60. There are no identified impacts within the construction phase of the project. This remains the case with mitigation in place. There are no significant impacts on the setting of heritage assets in the construction phase.
61. There are no appropriate mitigation measures for the operational phase. Therefore the residual impacts on the setting of heritage assets, with mitigation in place, remain as described above, with a moderate adverse significance of effect on the setting of five heritage assets and slight adverse significance of effect on the setting of ten heritage assets.

### 10.13 Cumulative Impacts

62. This is a summary of information that is contained Chapter 5 of the Consolidated ES Addendum (page 60). A further assessment of cumulative effects is outlined in the Joint Environmental Report for the proposed Interconnector project. This is contained in Volume 3 Appendix 2.1 of the Consolidated ES Addendum.
63. There are no significant cumulative impacts. This is because of the distance, scale and nature of the other developments in relation to the proposed Tyrone - Cavan Interconnector.

## 10.14 Transboundary Impacts

64. This is a summary of information that is contained Chapter 6 of the Consolidated ES Addendum (pages 82-83). A further assessment of transboundary effects is outlined in the Joint Environmental Report for the proposed Interconnector project. This is contained in Volume 3 Appendix 2.1 of the Consolidated ES Addendum.
65. There are no significant transboundary impacts. The impacts arising from the erection of the overhead line in Northern Ireland on cross border sites are considered to be limited due to the height of the proposed towers, associated lines and the distances to these sites. Those assets closest to the border are either located close to developments which have already affected their setting, screened due to intervening topography or where the setting of the assets do not contribute to their significance.

## 10.15 Response to Third Party and Statutory Consultee Submissions

66. Between 2009 and 2012, there were approximately 6,000 third party submissions made in relation to the proposed Tyrone – Cavan Interconnector. These were reviewed and taken into account in the writing of the Consolidated ES. Following the publication of that document in 2013, from May 2013 to May 2015, 2,957 third party submissions were made - of which three related to cultural heritage issues. These were taken into account in the writing of the Consolidated ES Addendum.
67. Between June 2015 and November 2016, there have been 594 third party submissions and of these six submissions made reference to cultural heritage. The general issues raised by objectors relate to concerns over the devaluing of heritage assets. The submissions did not raise any material considerations or any issues that were not dealt within the Consolidated ES and Addendum. The issues raised by the submissions are examined, analysed and evaluated in Chapter 12 of the Consolidated ES (Volume 2).
68. A response was received from NIEA Historic Monuments Unit in August 2015. This stated that they were 'content' with the proposal, conditional on the agreement and implementation of a developer-funded programme of archaeological works, to allow identification and recording of any archaeological remains identified, or to provide for their preservation. This forms part of the mitigation strategy for the scheme. This was contained within the response from the Department of the Environment, dated 20 August

2015 (reference: SM11/2 ARM 7, 11, 12, 15 16, 19 & TYR 61, 62). No further specific comment has been received from HED: Built Heritage Unit, although the Department of the Environment response states that it covered both archaeology and built heritage.

69. Objection Letter Numbers 1771, 1772 & 2984-2987 all raise concerns relating to the impact of the Proposed Development on Lisglynn Fort. These concerns are in relation to views from the top of the fort, with the *“uninterrupted view of county Armagh, and Tyrone including the city of Armagh with its two cathedrals”* of particular concern. Two of the letters also raise concerns that *“this significant local antiquity would be seriously compromised by the Proposed Development.”*
70. The impact on the setting of this site has been considered within the Consolidated ES (Site 86, assessed in Tables 12.5 and 12.6). The assessment states:  
*“Lisglynn Fort (86) is considered to be of high value. As the asset still survives as an extant earthwork feature on an area of raised ground, it is visible from the surrounding area, and appears to have views over the landscape around it. While there will be views of the Proposed Development, these are only in one direction from the rath. The proposed towers will be located below the level of the skyline and therefore will not become a focal point in views from the asset. In addition, any views of the proposed overhead line and towers would be reduced due to the distance from the asset. The Proposed Development will not reduce the significance of the asset and as a result the magnitude of change is considered to be minor negative, resulting in a slight adverse significance of impact.”* (paragraph 148, p411).
71. Views from Lisglynn Fort across to the city of Armagh and the cathedrals will not be affected by the Proposed Development as they are in the opposite direction.
72. Objection Letter Number 2984 further raises concerns over *“the negative effect the Proposed Development would have on Rawes Fort”*. The letter goes on to raise concerns that the Consolidated ES states that the Proposed Development does not impact on any areas of landscape or townscape value, indicating that Rawes Fort should be considered as such. The author therefore suggests that the Consolidated ES contradicts Policy PSU11 of *A Planning Strategy for Rural Northern Ireland*.

73. Rawes Fort is considered within the Consolidated ES in para 140, p410. As stated in the letter, this survives as a well preserved earthwork. The ES concluded that there would be a moderate adverse significance of impact upon it. However, an archaeological site, even one designated as a Scheduled Monument, does not constitute an area of landscape or townscape value and therefore Policy PSU11 has not been contradicted.
74. Objection Letter Number 2985 includes a list of sites and monuments within 1km radius of the proposed line. The letter states that these have been included “to demonstrate their significance in relation to the issue of the historic built environment”. The letter goes on to raise the impact on Navan Fort and the associated King’s Stables.
75. All of the Scheduled Monuments mentioned in the letter are included and considered within the ES, although some are unaffected by the scheme. Of the undesignated sites, half are included within the ES, while the remainder is not. This is because they fall outside of the study area utilised for the assessment.
76. Navan Fort and the King’s Stables were considered within the Consolidated ES. There will be no impact upon the setting of either site (paragraph 134) and Viewpoint 19 of the landscape assessment demonstrates this. In addition, both sites were visited as part of the assessment process.

#### 10.16 Events since the Addendum

77. Since the publication of the Consolidated ES and its Addendum, the following environmental information has become available, and is presented to the inquiry for the purposes of the inquiry. Accordingly, and by virtue of Regulation 23(6) of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 the requirements of paragraphs (4) and (5) of the said Regulation 23 do not apply.
78. There has been no relevant policy or legislative changes since the submission of the Consolidated ES and its addendum.
79. There have been changes to a number of cultural heritage guidance documents since the submission of the Consolidated ES and its addendum. These are as follows:
  - Institute for Archaeologists (2012) *Standards and Guidance for Historic Environment Desk-Based Assessments* has been replaced by Chartered Institute for

Archaeologists (2014) *Standards and Guidance for Historic Environment Desk-Based Assessments*;

- English Heritage (2011) *The Setting of Heritage Assets* has been replaced by Historic England (2015) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3*;
- Historic Scotland (2010) *Managing Change in the Historic Environment: Setting* has been replaced by Historic Environment Scotland (2016) *Managing Change in the Historic Environment: Setting*.

80. However, the updated documents do not result in any material changes to the assessment that has been undertaken. Had they been followed, there would be no effect on the scope of assessment, methodologies or conclusions.
81. There has been no significant change to baseline conditions since the submission of the Consolidated ES and its addendum.
82. As outlined in the Statement of Case and in Construction Technical Report (No. 4), alternative access is required to Tower 40 because of the construction of a chicken shed. Two alternative access tracks are described and assessed in the Construction Technical Report (No. 4). An assessment in terms of cultural heritage for the alternative access tracks is included in that Technical Report.
83. Confirmatory aerial surveys of the entire proposed Tyrone – Cavan Interconnector (proposed substation area and 500m either side of the overhead line centreline, which includes the proposed access tracks) were undertaken in October 2016. This photography was reviewed in terms of the cultural heritage baseline conditions and nothing of note was detected.

## 10.17 Summary and Conclusions

84. This is a summary of the information contained in the Consolidated ES, Chapter 12 – Cultural Heritage (pages 390 & 413).

85. The significant impacts to cultural heritage will be limited to the operation of the proposed Tyrone - Cavan Interconnector. These impacts arise from effects to the setting of heritage assets.
86. There are no construction impacts on recorded archaeological sites and therefore the impact is considered to be neutral. Throughout the construction period an archaeological watching brief will be maintained during removal of topsoil and subsoil in all areas of disturbance. Construction phase effects on the setting of heritage assets are not considered to be significant. Fencing will be provided along a section of the planning application boundaries during construction to protect Site 71, which is in proximity to the proposed works area but will not be directly impacted.
87. The proposed Tyrone - Cavan Interconnector will impact the setting of a number of archaeological sites and built heritage features during the operation of the proposed Tyrone - Cavan Interconnector. Mitigation measures have not been recommended as the setting of the assets is largely reliant on long distance views, and mitigation measures themselves could adversely affect the setting of assets. Therefore, there will be no reduction in the significance of impact upon individual sites. There will be a moderate adverse impact upon five assets and a slight adverse impact on ten assets.
88. As stated in the Statement of Case, PPS 6: Planning, Archaeology and The Built Heritage (PPS 6) policy BH1 (preservation of archaeological remains of regional importance) and policy BH 2 (protection of archaeological remains of local importance) only permit development proposals that would adversely affect such sites in “*exceptional circumstances*” (BH 1) and where “*other material considerations outweigh the value of the remains in question*” (BH 2). The impacts on historic parks, gardens, demesnes of specialist historic interest (BH 6) have been assessed as being of slight adverse impact on the Argory garden. No demesnes will be oversailed by the proposed Tyrone – Cavan Interconnector. As stated in the Statement of Case, this impact must be balanced against the overriding national and regional need for the proposed Tyrone – Cavan Interconnector. The impacts of the proposal upon the setting of No.39 Tullydowey Road and other sites of archaeological interest discussed in Consolidated ES Volume 2 Chapter 12 are therefore a matter that must be balanced by the decision maker, but, as stated in the Statement of Case, in terms of scale of impacts assessed those impacts

are outweighed in policy BH 1, BH 2, BH 6 and BH 11 terms by the overriding national/regional need for the proposed Tyrone – Cavan Interconnector. Further detail is contained within the Statement of Case.