

## Table Of Contents

<b>9</b>	<b>Cultural Heritage</b>	<b>1</b>
9.1	Executive Summary	1
9.2	About the Authors	2
9.3	Policy	3
9.4	Guidance	3
9.5	Further Environmental Information for the Purposes of the Inquiry	3
9.6	Cultural Heritage and impact on Tullydowey House and Gate Lodge	3
9.7	Impact on St Mochuas Holy Well and Sacred site of the Church	5
9.8	Impact on Listrakelt Fort	6
9.9	Impact on Mullyloughan House/Glenaul House	7
9.10	Impact on Various Cultural Assets	8
9.11	Periods Assessed in the Consolidated ES	9
9.12	EIA Compliance	11
9.13	Conclusion	12

## 9 Cultural Heritage

### 9.1 Executive Summary

1. In the SEAT Statement of Case, concerns were raised regarding the undergrounding and the alleged *“lesser impact than the overhead line, particularly in respect of the impact on the listed Tullydowey House and House Gate Lodge”*. In the partial undergrounding assessment (Appendix 10.2 Consolidated ES Addendum), it was concluded that partial undergrounding in this area would reduce, but not remove, effects on the setting of Tullydowey House and its gate lodge, and that there would inevitably be an increased risk of discovery of previously unrecorded archaeological remains with undergrounding, resulting in destruction of or damage to any such remains. Should undergrounding be considered on the totality of the route, a number of recorded assets would be physically impacted, and there would inevitably be an increased risk of discovery of previously unrecorded archaeological sites. This could result in large adverse impacts.
2. In addition, a letter from NIEA: Historic Monuments Unit (now the Historic Environment Division) dated 10<sup>th</sup> May 2010 stated:

*“An underground proposal would assist in reducing the potential adverse visual impact of the development upon the historic landscape. However it must be noted that, underground cabling would have the potential to damage/destroy previously unrecorded below ground archaeological remains, which are a limited and non-renewable resource. An underground scheme on such a scale would require extensive and costly archaeological mitigation”* (emphasis added).
3. Other third parties raised concerns with regard to St Mochuas Well, also known as the Blest Well or St Malachy’s Well, Listrakelt Fort, Mullyloughan House/Glenaul House, Mullyard Standing Stone and other sites. These sites have been addressed in the Consolidated ES. Allegations of *“destroying”* cultural assets and having *“enormous”* effects are not correct.
4. Concerns raised by third parties in terms of historical periods not assessed in the Consolidated ES, that the project *“fails to avoid sites of archaeological*

*interest*” or that it will “*destroy*” cultural assets, have an “*enormous*” effect or non-compliance with the EIA Regulations are incorrect.

5. Nothing in the objectors’ Statements of Case and representations serves to undermine the conclusions set out in the SONI Statement of Case and supporting Technical Reports. As stated in SONI’s Main Rebuttal Document, the proposed Tyrone - Cavan Interconnector remains clearly acceptable in planning terms.

## 9.2 About the Authors

6. Mrs Helen 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 Dawson 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.

### 9.3 Policy

9. The objectors' Statements of Case and representations raise no policy issues related to cultural heritage.

### 9.4 Guidance

10. The objectors' Statements of Case and representations raise no guidance issues related to cultural heritage.

### 9.5 Further Environmental Information for the Purposes of the Inquiry

11. No Further Environmental Information is required for the purpose of this report.

### 9.6 Cultural Heritage and impact on Tullydowey House and Gate Lodge

12. In the SEAT Statement of Case, Page 21, Paragraph 123 states:

*"Undergrounding is accepted as having a lesser impact than the overhead line, particularly in respect of the impact on the listed Tullydowey House and House Gate Lodge."*

#### **Response**

13. Cultural heritage was assessed in the report on *The Potential for Partial Undergrounding of the Line to Mitigate Significant Impacts on Landscapes* (Appendix 10.2 Consolidated ES Addendum). This report assessed partial undergrounding for sections along the entire 140km of the proposed

Interconnector (Ireland and Northern Ireland). The SEAT submission is referring to the assessment of a partial undergrounding section of the route in the Benburb area (Tower 29-33). It was concluded that partial undergrounding in this area will reduce, but not remove, effects on the setting of Tullydowey House and its gate lodge, and that there would inevitably be an increased risk of discovery of previously unrecorded archaeological remains with undergrounding. This would result in damage or destruction to any such remains. The report stated:

*“Significant effects upon recorded archaeological assets are not anticipated as a result of the UGC. Significant pre-construction mitigation measures would be required to ensure underground undiscovered archaeology is not damaged or destroyed during the construction of the UGC. The partial undergrounding would have an effect upon the setting of two Grade B1 listed buildings - Tullydowey House and its associated gate lodge. However the impact would be less than that of the OHL and so UGC is preferred to the OHL in terms of Cultural Heritage impacts.”* Page 172, Section 8.4.5, Paragraph 28.

14. However, although no recorded buried archaeological sites will be affected by undergrounding in this section of the route, there is an increased risk of discovery of previously unrecorded remains, resulting in damage or destruction of any such remains. As stated in the partial undergrounding report (Appendix 10.2 Consolidated ES Addendum):

*“Significant pre-construction mitigation measures would be required to ensure underground undiscovered archaeology is not damaged or destroyed during the construction of the UGC.”*

15. The assessment of partial undergrounding considered all environmental factors. As identified in Appendix 10.2 of the Consolidated ES Addendum, it was acknowledged that the partial undergrounding for the Benburb section would have reduced impacts in terms of landscape and cultural heritage. However it was considered there was no justification for, or greater benefit of, partial undergrounding at this location in the Benburb Area over the proposed overhead line for this location at Benburb. The partial undergrounding option at Benburb would create greater adverse impacts (agronomy, ecology, soils, geology, hydrogeology and traffic) than the overhead line. It was concluded that there is no overriding justification for, or

benefit of the provision of partial undergrounding when compared to the proposed interconnector, i.e. the overhead line design.

16. The undergrounding of the entire route was assessed and ruled out in Chapter 4 of the Consolidated ES and Chapter 10 of the Consolidated ES Addendum. Full undergrounding would physically impact a number of recorded assets, and there would inevitably be an increased risk of discovery of previously unrecorded archaeological sites. This could result in large adverse impacts.
17. In addition, a letter from NIEA: Historic Monuments Unit (now the Historic Environment Division) dated 10<sup>th</sup> May 2010 stated:

*"An underground proposal would assist in reducing the potential adverse visual impact of the development upon the historic landscape. However it must be noted that, underground cabling would have the potential to damage/destroy previously unrecorded below ground archaeological remains, which are a limited and non-renewable resource. An underground scheme on such a scale would require extensive and costly archaeological mitigation"* (emphasis added).

## 9.7 Impact on St Mochuas Holy Well and Sacred site of the Church

18. In his submission (SEAT SOC Appendix 18), Mr McNally states in paragraph 5 of his letter:

*"I also feel strongly that the Holy and Sacred Site that is St Mochuas Holy Well and Sacred site of the Church which dates back 1,400 has been overlooked in the proposed route of the power lines."*

### Response

19. St Mochuas Well, also known as the Blest Well or St Malachy's Well, is assessed within Chapter 12 of the Consolidated Environmental Statement (ES) as Asset 69. The church is Asset 70. Page 397, Paragraph 45 states:

*"The immediate study area also contains the remains of a former church and graveyard (70)"*

20. Page 399, Paragraph 59 states:

*"Sites of unknown date ... include two holy wells (10 & 69)"*

21. These assets are not considered to be affected due to the topography and distance from the line (365m from the nearest point of the line), in accordance with Page 402, Paragraph 93 of the Consolidated ES:

*“Other sites that have not been assessed are either located sufficiently far away for impacts to be minimal or non-existing or their setting does not contribute to their significance and consequently the construction of the Proposed Development will not affect them.”*

## 9.8 Impact on Listrakelt Fort

22. In paragraph 9 Mr McNally states:

*“As I travel from Keady to my home/work in Listrakelt I pass over what is known locally as “The Master’s Hill”. Looking from the top of the hill, at present, I see before me the beautiful rolling countryside leading to the historic monument of Listrakelt Fort. If NIE’s proposal is accepted in its present form I will no longer marvel at the beauty of the fort but rather the visual intrusion of a 400 KV power line and pylons which carry that line. These imposing and overbearing structures will be to the forefront, destroying an ancient and much loved monument.”*

23. The impact to Listrakelt Fort is also listed in the first paragraph of Mr and Mrs Lennon’s letter (SEAT SOC Appendix 18) and in the first paragraph of Mr Thomas Kelly’s letter (SEAT SOC Appendix 18).

### Response

24. Listrakelt Fort is assessed in the Consolidated ES as Asset 71. Page 404, Paragraph 103 states:

*“A rath (71), which has been remodelled to form a tree ring, has also had its east side straightened and the west side slightly cut by a trackway. However, the site still retains a roughly circular shape c. 30.5m in diameter with its surrounding bank surviving up to 4m in width. The site is considered to be of medium value, and has archaeological significance as excavation could improve our understanding of the site. The asset was originally designed to be a significant feature in the landscape, and it is located slightly to the east of the summit of a prominent and commanding hilltop. As a result the setting of the asset contributes to its significance.”*

25. The impact upon this asset is assessed on Page 410, Paragraph 143:

*“The rath (71) is considered to be of medium value. Although the site has been planted and remodelled to form a tree ring, it still forms a key element in the landscape. It was originally designed to have views over the landscape around it, but these have been partially reduced now due to the tree cover. However, it is still a dominant feature when viewed from the road. There will be views of the*

*development from the asset, and the towers will become the dominant feature in the landscape. Therefore the magnitude of change is considered to be moderate negative. This will result in a moderate adverse significance of impact."*

26. Therefore, the impact upon the setting of this rath has been fully assessed within the Consolidated ES, and it is acknowledged that there will be a moderate adverse effect upon it. This includes views from the rath, and views of the rath with the towers and rath in the same view. However, the rath will not be destroyed and the objector substantially overstates the impact.

## 9.9 Impact on Mullyloughan House/Glenaul House

27. In their submission (SEAT SOC Appendix 18), Mr and Mrs Todd, in Paragraph 2, state:

*"We live in a listed building. The environmental impact on this building and surrounding parkland will be enormous."*

### **Response**

28. Mr and Mrs Todd live at 73 Maydown Road, also known as Mullyloughan House or Glenaul House. This is Asset 35 in the Consolidated ES and is a Grade B listed building. Page 405, Paragraph 100 states:

*"Mullyloughan House (35), also known as Glenaul House, is an L-shaped late Georgian two-storey house built in 1830. A formal laid garden was formerly located to the west of the house, although this now appears to have partly been built over. This in turn gave way to parkland which also surrounds the house. As a Grade B listed building it is considered to be of high value. The house has architectural significance as it represents a fine example of a Georgian house, while it has historical significance due to its role in the development of settlement in the area. The positioning of the house suggests that it was designed to have views over its surrounding formal gardens and parkland, as well as the wider area. As such its setting is considered to contribute to its significance."*

29. The impact upon this asset is assessed on Page 410, Paragraph 139:

*"Mullyloughan House (35) is of high value. Although the house has some views over the surrounding landscape, including to the east and the area of the Proposed Development, these are limited by tree cover. This results in magnitude of change of minor negative, with the significance of impact of slight adverse"*

30. The impact upon this asset has therefore been assessed as slight adverse within the Consolidated ES. This is not considered to be a significant effect,



so the impact upon it in cultural heritage terms will certainly not be “enormous”.

31. Further, Historic Environment Division: Historic Buildings have stated in Appendix J to the Department for Infrastructure’s Statement of Case that:

*“HED:HB are content that ‘impacts have been identified and are addressed’ and have no further issues.”*

## 9.10 Impact on Various Cultural Assets

32. In the first paragraph of Mr and Mrs Lennon’s letter (SEAT SOC Appendix 18), they state:

*“Pylons ... will be visible ...from other local viewpoints in Derrynoose, such as the standing stone in Myllyyard. It follows the path of an ancient route way which links sites of significant local history, a rath at Listrakelt, the site of a local monastery, ancient church and graveyard and a holy well. As currently planned the proposed development...[Bullet 3] Fails to avoid sites of archaeological interest.”*

33. In the first paragraph of Mr Thomas Kelly’s letter (SEAT SOC Appendix 18), he states:

*“Pylons ... will be visible ...from other local viewpoints in Derrynoose, such as the standing stone in Myllyyard. It follows the path of an ancient route way which links sites of significant local history, a rath at Listrakelt, the site of a local monastery, ancient church and graveyard and a holy well.”*

### Response

34. The standing stone in Myllyyard is assumed to be the Mullyard Standing Stone. This asset is located outside of the 500m immediate study area and did not fit the criteria for assessment of sites in the wider study area, as laid out on Page 391, Paragraph 7 of the Consolidated ES:

*“The wider study area comprised an area of 5km from the Proposed Development. This was examined for Scheduled Monuments, State Care Monuments, entries on the Register of Historic Parks, Gardens and Demesnes and Conservation Areas to enable impacts upon the setting of these heritage assets to be assessed.”*

35. Any effect on an undesignated asset at a distance of approximately 1km from the Proposed Development is not considered to be significant in EIA terms.

36. NIEA (now HED) does not have a record of an ancient route way in the study area. Previous correspondence has made reference to the Slighe Midluachra, which was referenced to in the “Annals of the Four Masters” (AD 123). The route was reported to have travelled towards Slane, through the Moyry Pass north of Dundalk, round the base of Slieve Fuaid, near Newtownhamilton in Co. Armagh, to Emain Macha (Navan Fort), ending at Dunseverick on the north coast of Co. Antrim. There are no recorded remains of this route and it would not be possible to determine the impact, if any, on it. However, it is unclear if this is what Mr and Mrs Lennon refer to.
37. The rebuttal of the points raised on Listrakelt Fort is set out above.
38. The rebuttal of the points raised on St Mochuas Well, also known as the Blest Well or St Malachy’s Well, is set out above.
39. HED have no record of a monastery associated with this site or within the wider area on the Monuments and Building record.
40. The suggestion that the proposed development “*Fails to avoid sites of archaeological interest*” is incorrect. There are no physical effects upon any recorded heritage asset or archaeological site. This is stated in the Consolidated ES on Page 408 Paragraph 127:
- “No recorded archaeological sites will be directly impacted by the proposed tower locations.”*
41. In any historic landscape, impacts upon the setting of all heritage assets cannot be avoided. If the line were to be moved to reduce effects on one asset, it could easily introduce new impacts on other assets. The route of the Proposed Development has been chosen in part to minimise these effects.

## 9.11 Periods Assessed in the Consolidated ES

42. In “Section 3. The Cultural and archaeological aspects of the EIS” of Mr Jim Lennon’s letter (SEAT SOC Appendix 18), he states, in paragraphs 1-2:

*“In the locality where I live, the parish of Derrynoose all archaeology appears to end in the early Christian period. Industrial and agricultural based archaeology have been ignored. Pre and post famine features, field systems and settlement remains (some of which may have to be crossed to erect pylons) are ignored. A*

*particular feature of the landscape in this part of Ulster is remains associated with the linen and flax industries...not a mention in the EIS.*

*The lack of understanding of the relationship of the archaeological and cultural remains within the landscape, their links to present development patterns and their linkage with significant historical events in Ireland is completely absent.”*

### Response

43. This is incorrect. Additional information to set the archaeological sites within a wider context is provided in paragraphs 39 and 40 in section 12.3.1 of Chapter 12 of the Consolidated ES, as well as in the period-by-period descriptions, as appropriate (section 12.3.1, pages 395-401).
44. Sources consulted for the Consolidated ES are those required for desk-based assessments, in line with guidance from the Chartered Institute for Archaeologists. These included the Sites and Monuments Record, the Historic Buildings Unit, the Industrial Heritage Record, aerial photographs (both route specific and those held by OSNI), historic maps held by the NI Record Office and other documentary sources. Therefore, archaeological sites have not been excluded from the assessment. Within Derrynoose, all sites within the study area, available on these records, have been included within the assessment. If there are no sites later in date than the Early Christian period, this is because there are no recorded sites of later date.
45. Industrial and agricultural archaeology has not been ignored. Sources consulted as part of the ES included the industrial heritage record held by NIEA and analysis of historic mapping, including Ordnance Survey maps. Sites associated with field systems and settlement identified within the ES include a group of houses marked as ‘Englishtown’ (Asset **32**), enclosures representing a likely field boundary (Asset **36**) and a former school house (no longer extant, Asset **44**). Industrial sites include gravel pits (Assets **5, 16, 18, 41, 49 & 50**), flax mills (Assets **14, 57 & 59**), a bleach mill (Asset **23**), a yarn manufactory (Asset **38**), a smithy (Asset **47**), and quarries (Assets **51, 53 & 60-64**).
46. The Industrial Heritage Record has been one of the many sources consulted as part of the ES, as well as early Ordnance Survey mapping. Mills and other features which fall within the study area (e.g. Assets **14, 23, 38, 57, 59**) have formed part of the baseline assessment. Discussions on the linen &

flax trade included within the ES are on page 398, paragraphs 54-55.

Paragraph 55 states:

*“Of the 43 recorded sites from the post-medieval period within the study area, the majority are sites linked to industrial activities. Industrial remains have been identified largely from the historic mapping of the area, and include sites linked to the linen industry mentioned above as well as other trades... Keady, close to the southern part of the Proposed Development, developed in the 19th century due to the linen industry which grew up in this area.”*

47. It is also incorrect to state that the *“relationship of the archaeological and cultural remains within the landscape, their links to present development patterns and their linkage with significant historical events in Ireland is completely absent.”* The Baseline section of the Consolidated ES clearly relates archaeological sites identified within the study area to specific events in Irish history. For example, Page 398, Paragraphs 52-54, relates archaeological sites to the Ulster Plantation, the Ulster Rebellion and the Great Famine.

## 9.12 EIA Compliance

48. In Section 3. *The Cultural and archaeological aspects of the EIS* of Mr Jim Lennon's letter (SEAT SOC Appendix 18), he states, in paragraphs 3-4:

*“The EIA Regulations require an ES to provide such information as is reasonably required to assess the environmental effects of the development...including...[Bullets 8-10] material assets including architectural and archaeological heritage, landscape; and the inter-relationship of any of the above factors.”*

### **Response**

49. The project Archaeologists and Landscape Architects have worked closely together in recognition of the interrelationship of this aspect of cultural heritage and landscape whilst undertaking their assessments. Paragraph 5 of Chapter 13 of the Consolidated ES states:

*“In recognition of the interrelationship between landscape and cultural heritage, the project Landscape Architects have worked with the project Archaeologists when assessing impacts that have particular heritage value. This has been particularly relevant when assessing the effects on Registered Historic Parks and Gardens but has also been important when considering the value of cultural*

*heritage features across the study area and their relationship to landscape character sensitivity.”*

50. This has been particularly relevant when assessing setting effects on cultural heritage features. Photomontages produced for the landscape assessment have been utilised for the cultural heritage setting assessments.

## 9.13 Conclusion

51. In conclusion, nothing in the objectors' Statements of Case and representations serves to undermine the conclusions set out in the SONI Statement of Case and supporting Technical Reports. As stated in SONI's Main Rebuttal Document, the proposed Tyrone - Cavan Interconnector remains clearly acceptable in planning terms.