

CURRAGHINALT 33KV CONNECTION PROJECT
STATEMENT OF CASE TECHNICAL REPORT
CULTURAL HERITAGE

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1 THE PROPOSED DEVELOPMENT

The proposed Curraghinalt 33kV Connection project will connect the existing NIE Networks Strabane substation to a proposed substation building at the mine site via an electricity conductor that is c37.9 km in length, comprising of c26.9 km of overhead line (OHL) supported by single and double wooden pole sets and c11 km of underground cabling. A Cultural Heritage chapter (Chapter 6) for the ES was completed in May 2021. This Technical Report summarises the main elements of the Cultural Heritage chapter and provides updates on any changes to the baseline and to legislation/guidelines/policy, etc. since the ES was completed.

This Technical Report sets out the following summary of the assessment and outcomes:

- The methodology used in the assessment:
- Impacts without mitigation.
- Proposed mitigation measures.
- Residual impacts.
- Cumulative impacts/interactions/transboundary impacts.
- Consideration of consultation replies from statutory agencies and relevant third-party representations.
- Consideration of any changes to the baseline data, relevant policy, guidance and legislation since the completion of the EIA in May 2021.
- Conclusions.

Martin McGonigle BA MSc was the lead author on both the Cultural Heritage chapter and this Technical Report. Mr McGonigle graduated with a BA in Heritage Studies from G.M.I.T (now Atlantic Technological University) in 2001, followed by an MSc in Maritime Archaeology at the University of Ulster, Coleraine in 2002. Mr McGonigle is a Senior Archaeologist with John Cronin & Associates (JC&A) and has been a full-time professional archaeologist since 2002, a Licensed Archaeologist in RoI since 2008 & NI since 2009 and is a full member of Institute of Archaeologists of Ireland (MIAI). Since joining JC&A in 2008 Mr McGonigle has worked as Senior Archaeologist on numerous archaeological schemes and heritage projects, including cultural heritage assessments for environmental impact assessments, archaeological works on large infrastructure projects, etc. Mr McGonigle has also published articles nationally and internationally on a wide range of cultural heritage and archaeological subjects, including in peer reviewed journals. In 2021 Mr McGonigle graduated with an MSc in Applied Landscape Archaeology from the University of Oxford.

Where the review of baseline data or any relevant change in legislation, policy or guidance results in a need to update environmental information this is clearly identified in this technical report.

There have been no changes to the baseline environment in relation to cultural heritage since the Cultural Heritage Chapter was compiled in 2021.

The Legal and Policy Framework for the Protection of Cultural Heritage in Northern Ireland has not changed since the Cultural Heritage Chapter was compiled in 2021.

2 METHODOLOGY

The methodology used for the cultural heritage assessment of the Curraghinalt 33kV Connection project is set out in Section 6.2 of the Cultural Heritage Chapter.

The assessment methodology included both desktop research and field survey. A desktop survey of all archaeological and cultural heritage sites within an approximately 200m wide assessment corridor centred on the conductor alignment of the Proposed Development, was carried out in order to ascertain the heritage constraints and potential direct impacts therein. In addition, a further *circa* 1km wide study corridor centred on the Proposed Development was assessed in order to determine any potential indirect negative impacts of a visual nature on the cultural heritage resource, particularly Scheduled Monuments (context, setting, inter-visibility, group settings). Based on professional experience, and in the absence of published statutory guidance, it is judged that these parameters provide a sufficient geographical scope of the surrounding landscape from which to research and assess these constraints and their contribution to the archaeological/built heritage potential or otherwise of the proposed linear development area.

The Northern Ireland Sites and Monuments Record, (the Sites and Monuments Record is a map-based record with data on over 16,000¹ archaeological sites and historic monuments in Northern Ireland) was the principal source for identifying archaeological and built heritage constraints and in addition the following sources were consulted:

- Industrial Heritage Record;
- Historic Buildings Register;
- Register of Historic Parks, Gardens and Demesnes;
- Battlesites Register;
- Defence Heritage Register;
- Historic cartographic sources and aerial photographs;
- Irish Excavations Database; and
- Consultation of all the available archaeological and historical literature for the area.

An inspection of the Proposed Development route was undertaken in March, May and August 2018 and October 2019 by a team of suitably qualified and experienced archaeologists from John Cronin & Associates (JCA), in order to assess the existing and potential Cultural Heritage environment. Field survey consisted of a walkover archaeological inspection of the proposed overhead line and underground sections within greenfield areas and a drive survey of the underground sections within the road carriageway (with site inspections on foot at the locations of cultural heritage sites and at occasional locations along the route). All recorded cultural heritage sites within the 200m assessment corridor were visited. Additionally, all Scheduled Monuments within the 1km wide study corridor were inspected. During field surveys and assessment of the proposed alignment, weather conditions were good, with good visibility.

Following discussions with HED a set of photomontage images were produced to assess potential indirect visual impacts on the setting of Scheduled Monuments (TYR018:008 & TYR018:056) and a stone arrangement discovered during archaeological field survey for the project in 2018. Through further discussions, it was agreed that a short section of the overhead line (poles 2216 – 2228) could be moved to the southwest to lessen the visual impact. New photomontage images were produced showing the new placement of poles 2216 – 2228 in relation to the adjacent archaeological sites and a further field survey was conducted by the archaeological consultant jointly with representatives from NIE Networks and the Department for Communities (DfC) Historic Environment Division (HED) on 21 April 2021 to assess potential indirect visual impacts.

¹ The number of sites recorded on the Sites and Monuments Record stated on the Department for Communities website (<https://www.communities-ni.gov.uk/services/sites-and-monuments-record> - accessed 17/07/2024) has increased from 15,000 to 16,000

TECHNICAL REPORT

The following criteria (based on Environmental Protection Agency (Republic of Ireland) (EPA) (2017 – formally adopted and published May 2022) and International Council of Monuments and Sites (ICOMOS) (2011) guidelines) has been used to determine the methodology applied to assessment of the cultural heritage resource.

In order to determine level of impact, assessment was achieved by a consideration of the duration, quality, type, magnitude and value of effect(s) on the cultural heritage resource.

The duration of effects is assessed based on the following criteria:

- Momentary (seconds to minutes)
- Brief <1 day
- Temporary <1 year
- Short-term 1-7 years
- Medium term 7-15 years
- Long term 15-60 years
- Permanent >60 years
- Reversible: Effects that can be undone, for example through remediation or restoration

The quality of an effect on the cultural heritage resource can be positive, neutral or negative.

- Positive – a change which improves the quality of the cultural heritage environment (e.g. increasing amenity value of a site in terms of managed access, signage, presentation etc. or high-quality conservation/restoration and re-use of an otherwise vulnerable derelict structure).
- Neutral – no change or effects that are imperceptible, within the normal bounds of variation for the cultural heritage environment.
- Negative – a change which reduces the quality of the cultural heritage resource (e.g. visual intrusion on the setting of an asset, physical intrusion on features/setting of a site etc.)

The type of effect on the cultural heritage resource can be direct, indirect or no predicted impact.

- Direct – where a cultural heritage receptor is physically located within or in close proximity to the footprint of the project, which will result in its complete/partial removal, and/or complete/partial change to its setting.
- Indirect – where a cultural heritage receptor and its setting, is located in close proximity to the footprint of the Development and will have measurable impact, which is not a direct result of the project.
- No predicted effect – where the project will not adversely or positively affect a cultural heritage receptor.

The evaluation of the Value of a heritage asset is largely based on its significance criteria, and should not be considered definitive, but rather an indicator which contributes to a wider judgment based on the individual circumstances of each feature. Generally, the more criteria that are evident for a given asset, the higher in scale its respective value will be. Criteria to be considered in addition to any legal designations include a consideration of the condition/preservation, documentary/historical significance, group value, rarity, visibility in the landscape, fragility/vulnerability and amenity value.

The Value of all known or potential assets that may be affected by the Development should be ranked according to the following scale: High, Medium, Low and Negligible and Unknown potential. The table below has been derived from the ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011*.

Factors for assessing the Value of the Cultural Heritage Asset	
High	<ul style="list-style-type: none">• Scheduled Monuments (including proposed sites) and including standing built remains• Undesignated assets of schedulable quality and importance• Assets that can contribute significantly to acknowledged national research objectives• Grade A and Grade B+ Listed Buildings

	<ul style="list-style-type: none"> • Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade • Conservation Areas containing very important buildings • Undesignated structures of clear national importance
Medium	<ul style="list-style-type: none"> • Designated or undesignated assets that contribute to regional research objectives • Grade B1 or B2 Listed Buildings • Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations • Conservation Areas containing buildings that contribute significantly to its historic character • Historic townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures)
Low	<ul style="list-style-type: none"> • Designated and undesignated assets of local importance • Assets compromised by poor preservation and/or poor survival of contextual associations • Assets of limited value, but with potential to contribute to local research objectives • Record-only listed buildings • Historic (unlisted) buildings of modest quality in their fabric or historical association • Historic Townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures)
Negligible	<ul style="list-style-type: none"> • Assets with very little or no surviving archaeological interest • Buildings of no architectural or historical note; buildings of an intrusive character
Unknown	<ul style="list-style-type: none"> • The importance of the resource has not been ascertained • Buildings with some hidden (i.e. inaccessible) potential for historic significance

Magnitude of Impact is based on the degree of change, incorporating any mitigation measures on a cultural heritage asset and can be negative or positive. The Magnitude is ranked without regard to the value of the asset according to the following scale: **High; Medium; Low** and **Negligible**.

Factors in the Assessment of Magnitude of Impacts on the Cultural Heritage Asset (per ICOMOS 2011 & EPA Draft Guidelines 2017- formally adopted and published May 2022)	
High	<ul style="list-style-type: none"> • Change to most or all key archaeological materials, or key historic building elements, such that the resource is totally altered • Comprehensive changes to setting
Medium	<ul style="list-style-type: none"> • Changes to many key archaeological materials, or key historic building elements, such that the resource is clearly/significantly modified • Considerable changes to setting that affect the character of the asset, or significant modification of the setting of an historic building
Low	<ul style="list-style-type: none"> • Changes to key archaeological materials, or key historic building elements, such that the asset is slightly altered or slightly different • Slight changes to setting of an archaeological asset • Change to setting of a historic building, such that it is noticeably changed
Negligible	<ul style="list-style-type: none"> • Very minor changes to archaeological materials, or setting • Slight changes to historic buildings elements or setting that hardly affect it

The Significance of the effect is based on an assessment of the impact (character, magnitude, duration, probability and consequences) and the value (significance/sensitivity) of the heritage asset. The **Significance of Effect** can be described as **Profound, Very Significant, Significant, Moderate, Slight, Not Significant or Imperceptible**.

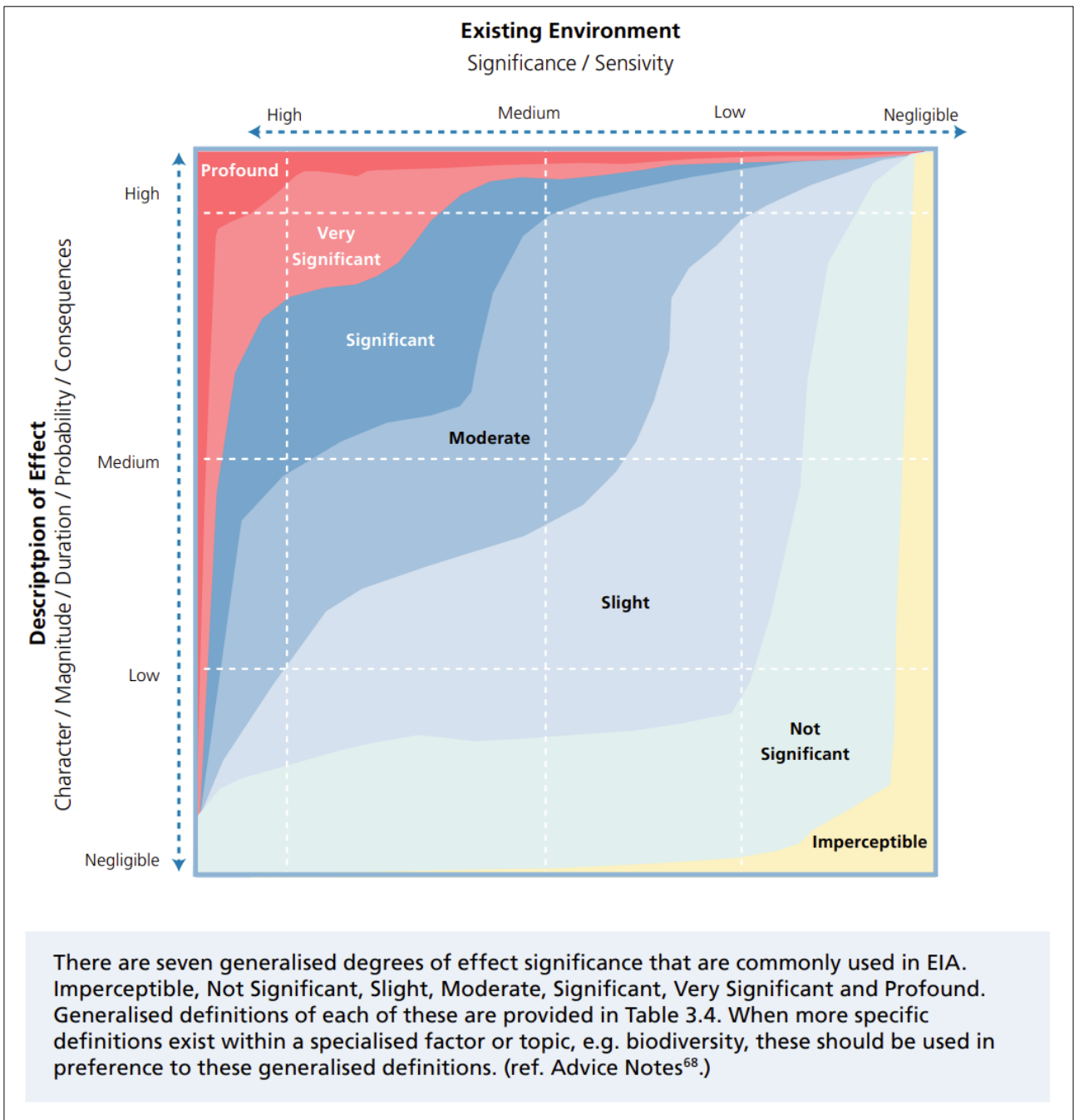


Figure 1 Chart Showing Typical Classifications of the Significance of Effects (Source:

Significance of Effects Matrix (per EPA Draft Guidelines 2017- formally adopted and published May 2022)							
Magnitude of Impact	High	Not Significant/ Slight	Slight/ Moderate	Moderate/ Significant	Very Significant	Very Significant/ Profound	Profound
	Medium	Not Significant	Slight	Moderate	Moderate/ Significant	Significant/ Very Significant	Very Significant/ Profound
	Low	Not Significant/ Imperceptible	Not Significant/ Slight	Slight	Slight/ Moderate	Moderate/ Significant	Significant/ Very Significant
	Negligible	Imperceptible	Imperceptible	Not Significant	Not Significant	Not Significant/ Slight	Not Significant/ Slight
		Negligible	Low	Medium	High	Very High	Extremely High
		Value/Sensitivity of the Heritage Asset					

3 BASELINE

- There are **no** recorded archaeological monument listed in the Sites and Monuments Record (SMR) within the 200m wide assessment corridor centred on the conductor alignment.
- There is **no** Listed Building located within the 200m wide assessment corridor centred on the conductor alignment.
- There are **no** Historic Parks, Gardens and Demesnes located within the 200m wide assessment corridor centred on the conductor alignment.
- There are **no** Defence Heritage sites located within the 200m wide assessment corridor centred on the conductor alignment.
- There are **no** Battle sites located within the 200m wide assessment corridor centred on the conductor alignment.
- There are **no** Areas of Significant Archaeological Interest (ASAI) located the 200m wide assessment corridor centred on the conductor alignment.
- There are **no** UNESCO World Heritage Sites (Cultural) located within the 200m wide assessment corridor centred on the conductor alignment.
- There are a total of five Industrial Heritage Record (IHR) sites within the 200m wide assessment corridor centred on the conductor alignment (see Table 1 below). Three (3 no.) sites directly located within areas where underground cabling is proposed.

Table 1: IHR sites within approximately 100m (200m assessment corridor) of the centre-line of the distribution 33kV power line

IHR No.	Townland	X Co-ord	Y Co-ord	Description
04409:000:00*	Garvagh / Meenadoo	252648	387069	Bridge
04463:000:00	Crockanboy/Teebane West	258310	383370	Bridge
04410:000:00	Garvagh	253129	387027	Abutments of Wooden Bridge
04461:000:00*	Teebane West	256662	383877	Bridge
04462:000:00*	Teebane West	257800	383499	Bridge

**located on proposed cable route*

There are three (3 no.) SMRs that are designated as Scheduled Monuments within the 1km wide study corridor centred on the conductor alignment (see Table 2 below).

Table 2: SMR Scheduled Monument sites within approximately 500m (circa 1km wide study corridor) of the centre-line of the conductor alignment

SMR No.	Townland	X Co-ord	Y Co-ord	Description	Period
TYR011:017	Ballykeery	244922	395399	Killeen (burial ground)	Early Christian
TYR018:056	Culvacullion	249285	389327	Stone circle	Prehistoric
TYR018:008	Culvacullion	249491	388930	Stone circle complex	Prehistoric

Field surveys carried out for the project by qualified and experienced archaeologists resulted in the identification of two features of archaeological potential, a mound feature and a stone arrangement. The possible mound was noted approximately 115m to the north of pole-set 2292 in the townland of Rousky at 255049/ 386146 Irish Grid. This feature is noteworthy, but in the absence of further (potentially intrusive) archaeological investigation it cannot be verified as archaeological.

The stone arrangement and small stone cairn was observed in the townland of Trinamadan, close to the boundary with Culvacullion at approximately 249940/389238 Irish Grid, approximately 0.5km northeast of Stone Circle Complexes and Stone Alignments TYR018:008 (Scheduled) and 0.6km east of Stone Circle TYR018:056 (Scheduled). The low height of the stones associated with the stone arrangement is typical of the mid-Ulster stone circles and stone alignments, and the potential site may be an example of same.

4 SUMMARY OF ASSESSMENT²

4.1 Construction Phase

The construction phase will involve limited, targeted ground excavation for purposes of erecting wooden pole-sets, with ground reinstatement therein. The proposed working corridor is 80m in width (40m either side of the centre line), however at certain locations a narrower or more restricted working corridor, sufficient to facilitate vehicular movements and temporary spoil storage will be used to avoid sensitive features/habitat. The proposed underground cabling will involve a continuous trench no more than 500mm and up to 1300mm deep. Ground excavation has the potential to impact on previously unrecorded archaeological finds, features or deposits that may exist at a sub-surface level and be uncovered during topsoil stripping operations.

There are **no predicted direct impacts on** recorded archaeological sites listed in the Sites and Monuments Record (SMR), Scheduled Sites, Listed Buildings, Historic Parks, Gardens and Demesnes, Defence Heritage sites, Battle sites, Areas of Significant Archaeological Interest (ASAI) or UNESCO World Heritage Sites (Cultural).

There are three Industrial Heritage Record (IHR) sites (bridges) located directly on the proposed distribution 33kV cable route. The underground cable will be set within the roadbed at these locations and is not predicted to affect the bridge structures. As such, potential direct impacts on bridge sites IHR 04409:000:00; IHR 04461:000:00 and IHR 04462:000:00 are considered **low value with low magnitude of impact; thereby having a 'not significant/slight' significance of effect.**

Ground excavation during construction phase (specifically pole-set locations and proposed underground cabling routes within greenfield areas) has the potential (albeit low on current knowledge) to impact on previously unrecorded archaeological finds, features or deposits that may exist at a sub-surface level. In the absence of mitigation, the potential impact on hitherto unknown archaeological features is **considered potential negative direct impact of low/medium value with high magnitude of impact, thereby having a potential slight/moderate significance of effect.**

The **indirect negative impacts of a visual nature** identified on both scheduled archaeological sites and two other potential archaeological sites identified during field survey during the construction phase of the Proposed Development will be of a temporary duration.

There is a likelihood for an indirect negative impact of low magnitude on the Scheduled Monuments **stone circle TYR018:056 and stone circle complex TYR018:008** (high value assets) leading to a **Slight/Moderate** Significance of effect. The Significance of effect on the stone arrangement is considered to be **Potential Moderate**. This **indirect impact on the potential mound is considered of potential low value with low magnitude of impact thereby having potential 'not significant' significance of effect.**

4.2 Operational Phase

Following the construction phase, there will be **no identified direct impacts** on the Cultural Heritage resource during the operational phase of the Proposed Development.

The **indirect negative impacts of a visual nature** identified on both scheduled archaeological sites and two other potential archaeological sites identified during field survey during the operational phase of the Proposed

² This section summarises the assessment undertaken in respect of the baseline as existing in May 2021 when the EIA was completed. Section 5 contains a review of any changes in the baseline data, cumulative/in-combination & transboundary considerations, legislation, policy and guidelines and/or any other consideration that would trigger the need for Further Environmental Information (AEI).

Development will be of a long-term duration (reversible). The significance of these effects during operational phase is discussed further below.

4.2.1.1 Impact on setting

The assessment of potential impacts on the setting of cultural heritage assets was informed by the Department for Communities document '*Guidance on Setting and the Historic Environment*'. This document provides a three-stage approach in considering the impact of a Proposed Development on the setting of a heritage asset including its Physical, Visual and Functional setting. These criteria were used to describe the potential impact on the setting of the stone arrangement identified during field survey, as well as the nearby Scheduled Monuments. In addition, photomontage images (see Cultural Heritage chapter (Chapter 6) of the Curraghinall 33kV Connection project) were produced from three viewpoints (taken from the newly discovered stone arrangement, stone circle TYR018:056 and stone circle complex TYR018:008 towards the location of the proposed OHL) to help assess potential visual effect on the stone arrangement (discovered during fieldwork for the project) and stone circle TYR018:056 and stone circle complex TYR018:008 (both Scheduled Monuments) to assess potential visual effects.

In summary, the assessment (see **Chapter 6 Cultural Heritage** for more details) noted that the proposed **Overhead Line (OHL)**:

- Will **not directly impact** on the physical location of the Scheduled Monuments: stone circle TYR018:056 and stone circle complex TYR018:008 or the stone arrangement.
- From a visual impact perspective, the Significance of effect on the stone arrangement is considered to be **Potential Moderate** (this potential site is not a recorded archaeological site). However, there is likelihood for an indirect impact of low magnitude on the Scheduled Monuments **stone circle TYR018:056 and stone circle complex TYR018:008** (high value assets) leading to a **Slight/Moderate** Significance of effect.
- Intervisibility was not an aspect of the functional setting of **stone circle TYR018:056 and stone circle complex TYR018:008 or the stone arrangement**, and it was clear from field survey that primary views from these sites were focussed towards different elements in the natural landscape. Views northeast from Scheduled Monument TYR018:056 towards the stone arrangement will include the OHL, though the impacts are considered to be **Slight/Moderate significance of effect**.
- It could not be determined if the mound was of archaeological significance. Views from the feature towards the proposed line show an existing overhead line (OHL) within the same field, therefore there is a potential low indirect (visual) impact on the potential site. This **indirect negative impact on the potential site is considered of potential low value with low magnitude of impact thereby having potential 'not significant' significance of effect**.

4.3 Decommissioning Phase

Once operational, the overhead line will become a network asset and form part of the wider network. Decommissioning is not envisaged, however should the overhead line be required to be decommissioned, all associated structures and materials would be recovered and items recycled with the site returned to its original use. Decommissioning impacts will be the same or lesser than the impact of construction.

Decommissioning is not envisaged, however should the underground cable be required to be decommissioned, it would be disconnected from the circuit breakers or poles to which it is connected, safely insulated using pot end joints and cable will be recovered. As a result, the impact of decommissioning the underground cable would be significantly less than the impact of installation.

5 MITIGATION

Proposed mitigation measures will reduce potential direct negative impacts on recorded cultural heritage sites and on potential, previously unrecorded subsurface archaeology that may be uncovered during ground reduction works associated with the construction phase of the project to a level of Slight/Not Significant. These measures are detailed in section 6.5 of the Cultural Heritage chapter (Chapter 6) for the EIA and are summarised below.

The Construction Phase Mitigation Measures are summarised as follows:

- Creation of exclusion zones around recorded/potential archaeological sites of approximately 50m by 50m in size (or larger if required) at initial phase of Construction Phase and maintenance of same throughout works on the project.
- The designated working areas and routing accesses to and from site will avoid the locations of the recorded and potential (new sites – stone arrangement and possible mound) and the Cultural Heritage resource located within the study area.
- Licensed archaeological monitoring programme (watching brief) to be carried out by a suitably qualified archaeologist (eligible to hold an archaeological excavation licence) at earliest stage(s) of construction phase at all greenfield cable route areas and all pole-set locations adjacent to Scheduled Monuments at Ballykeery and Culvacullion as well as adjacent to the possible archaeological features identified during field survey for the project (mound feature at Rousky and stone arrangement at Trinamadan).
- Should archaeological remains be uncovered appropriate mitigation such as, preservation *in situ* (preferred option) or further archaeological work in the form of archaeological excavation and recording will be implemented.
- A programme of post-evaluation/excavation reporting, commensurate with the level and complexity of any archaeology identified/excavated will follow any archaeological excavations, and a report will be issued to the relevant authorities.

In relation to Operational Phase Mitigation Measures, there are no applicable measures available to mitigate the indirect (visual) effects of the Proposed Development, however, the Significance of Effect was predicted to range from Not Significant/Slight to Moderate, with **no significant effects predicted** therefore no mitigation required.

6 RESIDUAL IMPACTS

The following table presents the residual impacts on the cultural heritage resource following the implementation of proposed mitigation measures.

Table 3: Residual Effect on the Existing Environment (Cultural Heritage)

Heritage Asset	Value of Asset	Magnitude of Impact	Significance of Effect
TYR011:017	High	Low	Slight/Moderate
TYR018:056	High	Low	Slight/Moderate
TYR018:008	High	Low	Slight/Moderate
IHR 04409:000:00	Low	Low	Not Significant/Slight
IHR 04463:000:00	Low	Negligible	Imperceptible
IHR 04410:000:00	Low	Negligible	Imperceptible
IHR 04461:000:00	Low	Low	Not Significant/Slight
IHR 04462:000:00	Low	Low	Not Significant/Slight
Stone arrangement	Potential Medium	Potential Medium	Potential Moderate
Possible mound	Potential Low	Potential Low	Potential Not Significant/Slight

Following the implementation of a programme of archaeological works, there are no predicted significant residual impacts on previously unrecorded subsurface archaeology (potential archaeological sites/features).

7 CONSULTATION RESPONSES AND SUBMISSIONS

7.1 Relevant Statutory Body Consultation Responses

Consultation letter from Department for Communities (DfC) Historic Environment Division (HED) dated 23 July 2020 stated the following:

HED (Historic Buildings) has considered the impacts of the proposal on the buildings on the basis of the information provided, and advise that it considers that the proposal satisfies Paragraph 6.12 of Strategic Policy Planning Statement for Northern Ireland and Policy BH 11 (Development affecting the Setting of a Listed Building) of the Department's Planning Policy Statement 6: Planning, Archaeology and the Built Heritage. HED (Historic Monuments) has assessed the application and has some concerns regarding the impact of the proposed overhead powerlines (OHL) on the setting of a group of prehistoric monuments in Culvacullion and Trinamadan townlands, Co. Tyrone. HED (Historic Monuments) considers that any adverse impact upon the setting of these monuments should be avoided and advises that the applicant considers realigning the proposed OHL to avoid the impacts identified in the archaeological impact assessment accompanying the application. HED (Historic Monuments) does not require an EIA and consider that the Cultural Heritage report submitted with this application would form that chapter of and EIA if one is required.

The EIA Screening Determination issued by the DfI stated the following in relation to cultural heritage:

It is considered the project has the potential to have a likely significant effect on cultural heritage (e.g.: on the setting of a group of prehistoric monuments in Culvacullion and Trinamadan townlands) by introducing an incongruous form of development into parts of the upland landscape. This impact has not been sufficiently mitigated and the impact is thus likely to be significant.

A meeting was held on 2 February 2021 between the cultural heritage consultant and HED to discuss potential measures to alleviate the potential impacts on the monuments at Culvacullion and Tirnamadan. Following this another consultation letter was issued by HED date on 11 March 2021 stating the following:

HED (Historic Monuments) notes that it has been determined that this application requires an EIA to be submitted to support it and advises that an Archaeological and Cultural Heritage section should be included within it. An Archaeological Impact Assessment (AIA) has already been submitted for the proposed scheme and this could form the basis of the Archaeological and Cultural Heritage section within the EIA with revisions to reflect our previous comments on this scheme (received by planning on 23/07/2020).

Following consultation with HED it was agreed that a short section of the overhead line (poles 2216 – 2228) should be moved to the southwest (within the planning boundary). The approach taken here was to reduce indirect negative impacts by design. This would bring the overhead line closer to the Scheduled Monuments but will lower the elevation of the OHL and consequently reduce the amount of it that breaks the skyline over Slievemore hill and thus has the potential to reduce the overall visual impact on the Scheduled Monuments. Photomontages showing this section of line were amended accordingly.

A site meeting was held on 21 April 2021, attended by the archaeological consultant and representatives from NIE Networks and HED. Scheduled Monument TYR018:008 and the stone arrangement were visited, and a discussion on the amended photomontage images was had. It was agreed that the primary views from both sites was towards the south and west (the valley of the Owenkillew River and beyond) and the amended section of overhead line (poles 2216 – 2228) as represented in the amended photomontages reduced the impact in the landscape in views from the Scheduled Monuments (TYR018:008 & TYR018:056).

7.2 Relevant Third Party Representations

Archaeological sites and cultural heritage are only mentioned as part of a wider objection in relation to the visual impacts on the landscape amenity of the Sperrins Area of outstanding Natural Beauty (AONB) and the impacts on tourism potential. Predicted wider impacts on the Sperrins AONB are addressed in Section 5.5 of the LVIA (Chapter 5) of the EIA.

8 REVIEW OF NEED FOR AEI IN RESPECT OF CHANGES IN BASELINE DATA, CUMULATIVE/IN COMBINATION IMPACTS, TRANSBOUNDARY, LEGISLATION/GUIDELINES/POLICY, OTHER

8.1 Cumulative/In Combination Impacts

The Cultural Heritage chapter (Chapter 6) for the proposed Curraghinalt 33kV Connection project considered the Proposed Development in combination with other proposed and consented wind farm related overhead line and electrical connections developments within 5km of the Proposed Development and concluded that there will be no likely significant cumulative impacts.

Since the compilation of the Cultural Heritage chapter (Chapter 6) in 2021, two further planning applications relating to overhead lines have been submitted to Derry City and Strabane District Council:

Application Reference:LA11/2023/1691/F

'Proposed new 33kV Network consisting of both overhead line on wooden pole type construction & underground cable. The overhead line total route length is approximately 8.89km and the underground cable 11.27km. The total route length is 20.16km all within the Derry & Strabane Council area (Amended description).'

Application Reference:LA11/2024/0491/F

'Proposed new 33kV Network consisting of both overhead line on a wooden pole type construction and underground cable. The overhead line total route length is approximately 13.83km and the underground cable 4.67km. The total route length is 18.5km all within the Derry & Strabane Council area.'

Although both Application Reference:LA11/2023/1691/F and Application Reference:LA11/2024/0491/F will also be connected to Strabane Substation, there are no cultural heritage sites recorded within the study areas for these proposed developments in common with those assessed for the proposed Curraghinalt 33kV Connection project. As a result, there will be no likely significant cumulative impacts relating to cultural heritage.

8.2 Interactions

The LVIA (Chapter 5 of the Curraghinalt 33kV Connection project) has assessed the visual impact on two registered Historic Park and Gardens sites in close proximity to the Proposed Development: Holyhill (HB10/02/001) and Beltrim Castle (HB11/16/13). The Significance of Landscape Effect was considered 'not significant' for both sites.

8.3 Transboundary Impacts

Although a portion of the Proposed Development near Strabane will be close to the international boundary with the Republic of Ireland the study area for the cultural heritage assessment does not extend across the border. The closest National Monument in State Care Ownership & Guardianship (a designation in RoI for high status archaeological sites), Beltany Stone Circle (reference no. DG070-026001) is located approximately 11.2km west of the Strabane substation site (<https://www.archaeology.ie/sites/default/files/media/pdf/monuments-in-state-care-donegal.pdf>). Given the large distance between the Proposed Development and (DG070-026001), there is no predicted impact on this National Monument.

The town of Lifford in County Donegal (RoI) contains town defences, which are currently only known from historical reference and have no upstanding elements. The National Policy on Town Defences (<https://www.archaeology.ie/sites/default/files/media/publications/national-policy-on-town-defences.pdf>) states that it is now practice to treat urban defences as National Monuments. The Lifford Town Defences (DG071-008005-), although invisible and unlocated within the modern town are considered a National Monument, although not in State Care Ownership & Guardianship. The Lifford Town Defences are located

approximately 3.6km southwest of Strabane Substation. Given the large distance between the Proposed Development and Lifford Town Defences there is no predicted impact.

Therefore, it is judged that there will be no predicted transboundary effects on the cultural heritage resource as a result of the Proposed Development.

8.4 Changes to Legislation/Guidelines/Policy

The Legal and Policy Framework for the Protection of Cultural Heritage in Northern Ireland has not changed since the Cultural Heritage Chapter was compiled in 2021.

The Environmental Protection Agency (EPA) (Republic of Ireland) *Draft Guidelines for Information to be contained in Environmental Impact Assessment Reports* (2017) were formally adopted and published by the EPA in May 2022.

8.5 Changes to Baseline

There have been no changes to the baseline environment in relation to cultural heritage since the Cultural Heritage Chapter was compiled in 2021.

9 CONCLUSIONS

There have been no changes to the baseline environment in relation to cultural heritage since the Cultural Heritage Chapter was compiled in 2021.

The Legal and Policy Framework for the Protection of Cultural Heritage in Northern Ireland has not changed since the Cultural Heritage Chapter was compiled in 2021.

The assessment of impacts noted that there is no predicted direct impact on recorded archaeological sites and possible archaeological sites (stone arrangement and possible mound) identified during field survey for the project. However, there is likelihood for an indirect impact of low magnitude on the Scheduled Monuments (high value assets) leading to a Slight/Moderate Significance of effect, while the potential indirect impact on the stone arrangement is considered Potential Moderate and on the possible mound is Potential Not Significant/Slight. These indirect impacts will have a temporary duration during construction phase and long-term (reversible) during operational phase.

There are three Industrial Heritage Record (IHR) sites (bridges) located directly on the proposed distribution 33kV cable route. The underground cable will be set within the roadbed at these locations and is not predicted to affect the bridge structures. As such, potential direct impacts on bridge sites IHR 04409:000:00; IHR 04461:000:00 and IHR 04462:000:00 are considered low value with low magnitude of impact; thereby having a 'not significant/slight' significance of effect.

Ground excavation during construction phase has the potential to impact on previously unrecorded archaeological finds, features or deposits that may exist at a sub-surface level. In the absence of mitigation, the potential impact on hitherto unknown archaeological features is considered potential negative direct impact of low/medium value with high magnitude of impact, thereby having a potential slight/moderate significance of effect.

Once operational, the overhead line will become a network asset and form part of the wider network. Decommissioning is not envisaged, however should the overhead line be required to be decommissioned, all associated structures and materials would be recovered and items recycled with the site returned to its original use. Decommissioning impacts will be the same or lesser than the impact of construction.

Decommissioning is not envisaged, however should the underground cable be required to be decommissioned, it would be disconnected from the circuit breakers or poles to which it is connected, safely and insulated using pot end joints and cable will be recovered. As a result, the impact of decommissioning the underground cable would be significantly less than the impact of installation.

The Construction Phase Mitigation Measures are summarised as follows:

- Creation of exclusion zones around recorded/potential archaeological sites of approximately 50m by 50m in size (or larger if required) at initial phase of Construction Phase and maintenance of same throughout works on the project.
- The designated working areas and routing accesses to and from site will avoid the locations of the recorded and potential (new sites) and the Cultural Heritage resource located within the study area.
- Licensed archaeological monitoring programme (watching brief) to be carried out by a suitably qualified archaeologist (eligible to hold an archaeological excavation licence) at earliest stage(s) of construction phase at all greenfield cable route areas and all pole-set locations adjacent to Scheduled Monuments at Ballykeery and Culvacullion as well as adjacent to the possible archaeological features identified during field survey for the project (mound feature at Rousky and stone arrangement at Trinamadan).
- Should archaeological remains be uncovered appropriate mitigation such as, preservation *in situ* (preferred option) or further archaeological work in the form of archaeological excavation and recording will be implemented.
- A programme of post-evaluation/excavation reporting, commensurate with the level and complexity of any archaeology identified/excavated will follow any archaeological excavations, and a report will be issued to the relevant authorities.

In relation to Operational Phase Mitigation Measures, there are no applicable measures available to mitigate the indirect (visual) effects of the Proposed Development, however, the Significance of Effect was predicted to be Not Significant/Slight, Slight, Slight/Moderate, or Moderate. Any potential direct impacts on hitherto unknown sub-surface features are deemed to be adequately mitigated by a licenced programme of archaeological monitoring (watching brief) with appropriate evaluation, recording and reporting therein. Following the implementation of a programme of archaeological works, there are no predicted significant residual impacts on previously unrecorded subsurface archaeology (potential archaeological sites/features).

There is no likely significant impact predicted on the cultural heritage resource as a result of this Proposed Development.