

**SECTION A**

**1. Personal Details**

**2. Agent Details (if applicable)**

Title [REDACTED]

First Name [REDACTED]

Last Name Job Title (Where relevant) [REDACTED] Senior Inspector

Organisation DfC Historic Environment Division

Address Line 1 NINE LANYON PLACE

Line 2 Town Parks,

Line 3 BELFAST

Line 4

Post Code BT1 3LP

Telephone Number [REDACTED]

E-mail Address [REDACTED]

**SECTION B**

3(a). Have you submitted a representation to the Council regarding the draft Plan Strategy?

Yes  No

3(b). If yes, please provide the reference and summary of issue raised in your representation.

MEA- DPS-008

HED considered the draft plan strategy on the whole to be generally sound. In our representation we did identify areas of the strategy where we consider that policies in relation to the historic environment should be made more sound

## Counter Representation

Any person may make a counter representation in relation to a representation seeking a change to the Draft Plan Strategy. The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the Draft Plan Strategy as a result of representations submitted under Regulation 15 and 16 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

**A counter representation must not propose any further changes to the Draft Plan Strategy.**

4. Please provide the reference number of the representation to which your counter representation relates to.

MEA -DPS -076

5. Please give reasons for your counter representation having particular regard to the soundness test identified in the above representation. Please note that your counter representation must not propose any new changes of the draft Plan Strategy.

Please note your counter representation should be submitted in full and cover succinctly all the information, evidence, and any supporting information necessary to support/justify your submission. **There will not be a subsequent opportunity to make any further submissions based on your original counter representation.** After this stage, further submissions will only be at the request of the independent examiner, based on the matters and issues he/she identifies at independent examination.

See attached HED counter representation in relation to the above.

*(If additional space is required, please continue on a separate sheet)*

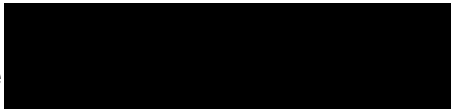
### SECTION 3. Data Protection

In accordance with the Data Protection Act 2 18, Mid and East Antrim Borough Council has a duty to protect any information we hold on you. The personal information you provide on this form will only be used for the purpose of plan preparation and will not be shared with any third party unless law or regulation compels such a disclosure. It should be noted that in accordance with Regulation 19 of the Planning Local Development Plan Regulations Northern Ireland 2015, the council must make a copy of any counter representation available for inspection.

The Council is also required to submit the counter representations to the Department for Infrastructure and they will then be considered as part of the Independent Examination process. For further guidance on how we hold your information please visit the Privacy section at;

[https://www.midandeantrim.gov.uk/downloads/PRIVACY\\_NOTICE\\_LDP.pdf](https://www.midandeantrim.gov.uk/downloads/PRIVACY_NOTICE_LDP.pdf)

Signature



Date

26th March 2020

## Historic Environment Division

Klondyke Building  
Cromac Avenue  
Gasworks Business Park  
Malone Lower  
BELFAST  
BT7 2JA

Date: 26<sup>th</sup> March 2020

### **HISTORIC ENVIRONMENT DIVISION: COUNTER-REPRESENTATION TO MEA DPS 076**

Historic Environment Division (HED) have considered the above representation made by Turley Associates. HED disagree with the points of soundness raised around policy HE1 and specifically refute the arguments that the extension to the Knockdhu Area of Significant Archaeological Interest (ASAI) has not been founded on Sound Evidence.

Our counter- representation relates to Section 6 of the above referenced representation, which relates to the draft Policy HE1 on *Archaeological Remains and their Settings*, and to the assessment of the extension by ORION Heritage consulting, included in Appendix 4 of the representation.

HED advise that our previous comments, on the soundness of the historic environment policy approach in the draft plan strategy, remain unchanged (see ref: MEA DPS 008).

The Strategic Planning Policy Statement (SPPS) section 6.29, bullet point 2, refers to the rationale for designation of ASAI.

*“.....Where appropriate LDPs should designate Areas of Significant Archaeological Interest (ASAI)s. Such designations seek to identify **particularly distinctive areas of the historic landscape** in Northern Ireland. They are likely to include a number **of individual and related sites and monuments** and **may also be distinguished by their landscape character and topography**. Local policies or proposals for the protection of the overall character and integrity of these distinctive areas should be included in LDPs where relevant.”*

Footnote 14 further articulates that the Historic Monuments Council, the Statutory Advisory body to the Department (DfC – Historic Environment Division) must be consulted on the identification of ASAI.s.

The plan itself is the mechanism by which ASAI are designated, and the HMC must be consulted on their identification.

In accordance with these policy requirements Historic Environment Division consulted with the Historic Monuments Council with regard to the identification of the extended ASAI at Knockdhu, on 25<sup>th</sup> July 2017, and following their endorsement of the identified area have supplied a

Statement of Significance to the local authority in February 2019. This statement, which the council have included in Appendix C, of their Technical Supplement 13: Built Heritage outlines distinctive qualities of the ASAI, and also considers types of development which would have the potential to adversely impact on its distinctive characteristics. It includes a map of the identified ASAI area, along with a selection of imagery and tables displaying a list of the archaeological monuments currently recorded in the area of landscape concerned. Below we address individual points raised in the representation.

Para 6.4 of the representation. HED consider that the draft policy aligns with the SPPS 6.8 in that development that would adversely impact on the ASAI must only be permitted where it meets the exceptional circumstances test for adverse impact on archaeological remains of regional importance. Furthermore we consider that the exceptional circumstances baseline against which development proposals will be considered is clear in 10.1.15 of the draft plan strategy “where there is no practical alternate site and where there is a regionally significant overriding need for development”. We therefore advise that the policy aligns with Strategic Planning Policy, and also with policy as presently articulated in Planning Policy Statement 6, and is sound in accordance with test CE3. In relation to the specific values and landscape merits of the ASAI HED refer to the aforementioned statement in Technical Supplement 13, which summarises the special qualities of the ASAI.

Para. 6.6 and 6.7. HED consider that the use of the word “likely” is justified in relation to the landscape of the Knockdhu ASAI, which is a wide open expanse of unimproved rugged landscape with considerable time depth and few obtrusive modern structures (refer to the statement we have submitted to the council already and to LCA 2000), and that the policy is sound in accordance with CE2. The word “likely” is not definitive and provides appropriate flexibility in accordance with CE4, when considering the exceptional circumstances articulated in the policy. The onus would however be on an applicant to demonstrate that their application meets this test.

Para 6.8 HED note that we can see no opinion on the visual appearance of turbines or other high structures in policy HE1, and moreover would advise that adverse impacts can also be direct, e.g. physical impact on archaeological remains, or impacts on the functional setting, as well as the visual. They can include the impacts of creating associated infrastructure to individual developments. Again we highlight that the drafted policy allows for exceptional circumstances and is therefore sound.

Para 6.9 HED have considered the assessment of the ASAI by Orion Heritage Ltd in Appendix 5 and provide the following comments.

HED would contend that we are not *proposing* an ASAI but have identified it in line with the policy requirements of SPPS 6.29. The ASAI can only be designated however in the context of the Local Development Plan becoming adopted.

In relation to “the lack of published evidence”

HED highlight that there is no pre-requisite for an ASAI or its extension to be based on published evidence such as the referenced article by McNeary (2014). An identified ASAI itself is published, and may be designated through a local development plan. We advise that in this case the identification of the extended area was informed by robust evidence incorporating:

- Published data from the Northern Ireland Sites and Monuments Record (publicly available), <https://www.communities-ni.gov.uk/services/sites-and-monuments-record> Information pertaining to each of the individual recorded archaeological sites listed within the ASAI statement, along with associated detailed scanned documentation, can be reviewed using this database
- GIS analysis, including and use of published LiDAR data, aerial photographic imagery (Available through Spatial NI) and historic ordnance survey mapping. This has been of importance in reviewing and extending the Knockdhu ASAI to more accurately reflect the distinctive characteristics of the historic landscape as well as those archaeological sites and monuments which contribute to that distinctive character and their settings. In considering setting HED adopt the methodology which is outlined in our guidance document <https://www.communities-ni.gov.uk/publications/guidance-setting-and-historicenvironment>
- The Northern Ireland Landscape Character Assessment 2000 (most particularly LCA 124 Larne Basalt Moorland, and 126 Larne Coast <https://www.daera-ni.gov.uk/search/type/publication?query=LCA&page=5> and The Northern Ireland Regional Landscape Character Assessment 2015 (most particularly Area 18 Antrim Plateau and Glens) <https://daera-ni.maps.arcgis.com/apps/MapJournal/index.html?appid=dee491ff43c0415fbb986f74c92f39a9>
- Reference to the published work of R. McNeary (cited by Orion in the representation which includes study of the area captured on LiDAR immediately east of the existing ASAI and mapping of trackways immediately north.
- Fieldwork, walking this landscape, alongside R. McNeary to better understand the visual and wider historic landscape setting of the Knockdhu promontory and other monuments and historic features in the landscape. Field inspection took place on 24/05/2017
- A review of the existing Knockdhu ASAI which was designated in the Larne Area Plan 2010, (Plan Policy CON 4 and Map no 27) (and which predates McNeary's published 2014 paper) with consideration afforded as to how some planning applications in the surrounding landscape since its designation have threatened the integrity and setting of the landscape including views from scheduled monuments such as Knockdhu, the cairn on Scawt Hill and the Linford earthworks,

#### ORION comments referencing "Existing Protections"

HED advise that the Statement we have provided to the council (see copy Appendix 1) includes, as well as a description of the landscape of the ASAI, incorporating the extension, in tabularised form, a list of the archaeological assets currently recorded on the Northern Ireland Sites and Monuments Record. In addition to the two sites of archaeological interest highlighted by Orion heritage, these also include, a motte in the townland of Corkermain, and a rath in the townland of Ballyruther (all additional sites are highlighted in table for benefit of the examiner.)

Critically important, in addition to these recorded assets, other heritage aspects of this landscape lending to its distinctive historic character, articulated, as per the Statement, include historic routeways and hollow ways, evidence of pre-improvement farming with transhumance huts and enclosures, placenames, and elements of the natural landscape and its topography.

HED emphasise that an ASAI is a designation of an area of landscape. The statement in the Orion letter, dated 10 December 2019, states

*“Areas of Significant Archaeological Interest are designated to protect remains of particular archaeological significance.”*

HED advise that this statement is inaccurate, and is an unsound interpretation of policy in SPPS 6.29 which articulates

*“Such designations seek to identify **particularly distinctive areas of the historic landscape in Northern Ireland. They are likely to include a number of individual and related sites and monuments and may also be distinguished by their landscape character and topography**”.*

In identifying the extension to the Knockdhu ASAI, HED have considered the distinctive character of the **historic landscape**, including the monuments it contains and its topographical features, which as well as natural elements, include historic routeways etc referenced above. We advise that the boundary lines of the extended area of the ASAI, as well as considering spatial distribution of heritage assets, landscape character, and time depth of the area, have been carefully considered and have themselves been informed by examination of historic landscape characteristics including natural features, contour lines and historic boundaries, including townland boundaries. The extended area now follows the historic townland boundary at north and a historic abandoned routeway at east, important attributes of the historic landscape. The extended area, including its boundaries, is therefore clearly based on historic landscape attributes. We consider this to be sound in line with CE2.

The Orion correspondence states that *“significant features to the north of the existing ASAI already benefit from adequate statutory protection”*. HED highlight that the protected status of heritage assets is not relevant to the designation of an ASAI, which, as stated above, is focused on the distinctive character of the historic landscape, in line with policy requirements. The statement is also inaccurate in that only the cairn at Scawt Hill actually has a statutory protection, as a scheduled monument, while the referenced enclosure is a monument of local archaeological importance. Notwithstanding, these sites in themselves, and the two other recorded archaeological assets, a counterscarp rath and a scheduled Anglo Norman motte, included in the extended area, are not the sole reason for extending the ASAI. Rather, as previously articulated it is about the distinctive historic character of the landscape itself.

We attach the following as items of additional evidence to illustrate the reasoning and support behind the extension to the ASAI

- Appendix 1 – A copy of the Statement on the Knockdhu ASAI which was included in the council’s evidence with the four additional sites recorded on the NISMR highlighted, these are included in the identified extension.
- Appendix 2 –Image indicating some of the historic landscape attributes identified on LiDAR and continuing through the landscape outside the LiDAR surveyed area
- Appendix 3 Images of hollow ways taken in the northern part of the extended ASAI area



Para 6.10 This cited extract from the PAC decision relates to the setting of an ASAI, and development outside it, not to proposals actually within the landscape of an ASAI itself. Consequently this content is immaterial to the designation of the ASAI and consideration of direct impacts within it. HED would also highlight that because the purpose of an ASAI is, as defined in policy, the designation of an area of **historic landscape character**, we consider that it is appropriate to consider that impacts on landscape capacity or character may have an impact in the ASAI.

Para 6.11 and 6.12 – As stated already the policy aligns with SPPS in that it allows for exceptional circumstances. Applications will therefore be considered on a case by case basis through the policy and will be subject to meeting this test. As per our previous comments above we advise that the identification of the ASAI is based on robust evidence, is sound in accordance with CE2 , provides flexibility in accordance with CE4, and that the policy approach aligns with the approach outlined in SPPS 6.8.

Para 6.17 The reason the Statement of Significance relates to the entirety of the ASAI is because it has been established that the distinctive historic landscape character identified extends into both the previously designated ASAI and the identified extension. Both elements are part of the same area of landscape and inseparable in terms of their character and significance.

Para 6.19 and 6.20 See our comments in relation to the Orion report, - we disagree that the Statement doesn't comment on the visual aspects of the ASAI. While SPPS makes no requirement to consider visuals in designating an ASAI, HED have considered the visual, the historic, functional, and the natural aspects of the landscape character. The statement makes specific reference to aspects included in the extension, including hollow ways and historic routeways and refers to the expansive visuals from Knockdhu itself. HED emphasise that the identification of the ASAI is based, in line with policy, on its historic landscape attributes, -while the potential for change is considered, this is not the driving reason for the designation of the landscape.

Para 6.21 In conclusion Historic Environment Division advise that the extension to the Knockdhu ASAI has been identified on the basis of robust and up-to-date evidence in accordance with requirements of Sustainability Appraisal and of soundness test CE2. Its identification is compliant with the requirements of SPPS 6.29, and we consider that the council's policy approach is sound in accordance with CE3. We further consider that the policy approach provides the required flexibility in accordance with CE4.



# KNOCKDHU CANDIDATE AREA OF SIGNIFICANT ARCHAEOLOGICAL INTEREST

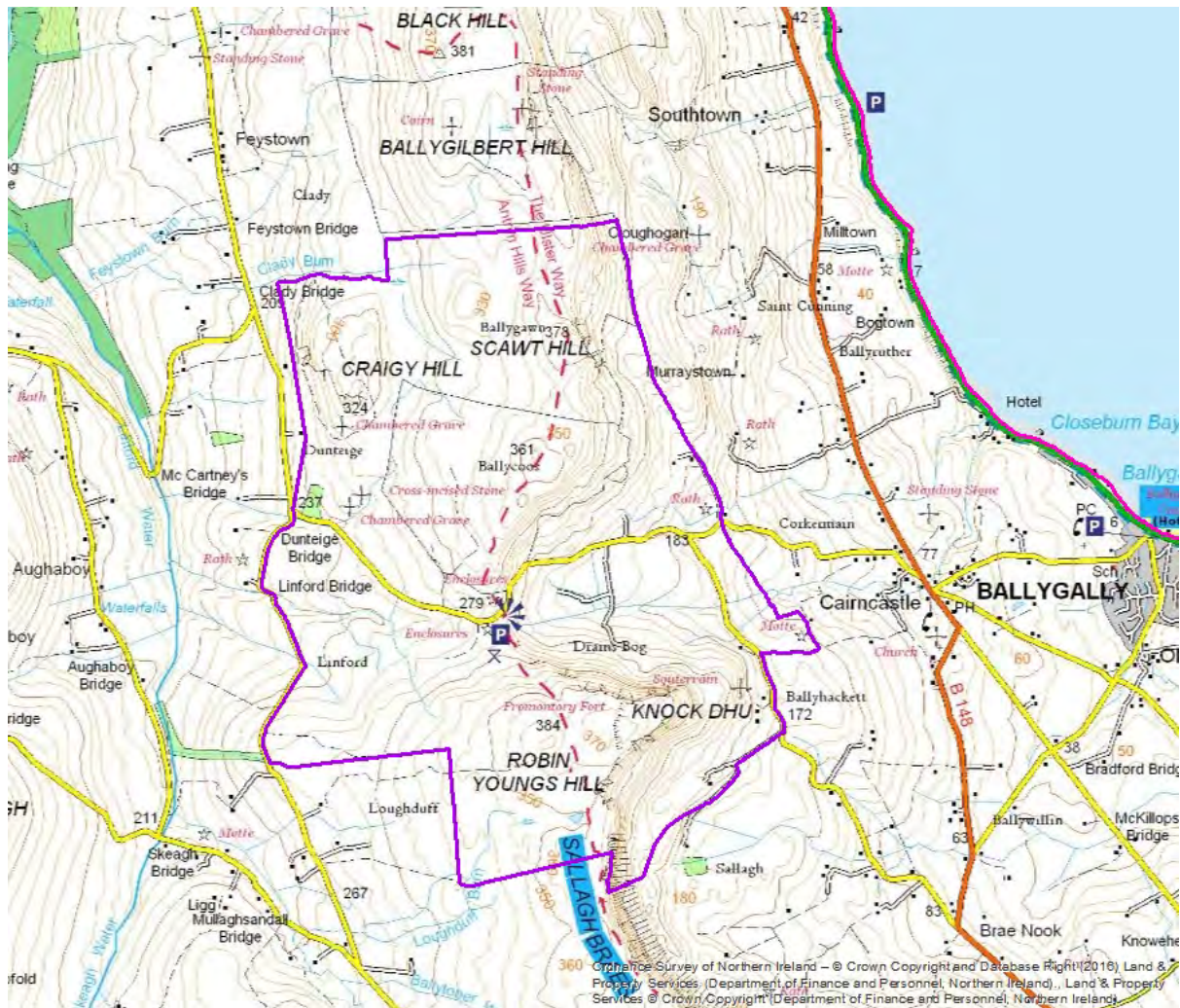


## Contents

1. Preamble
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3. Map
4. Selected imagery
5. Lists of Heritage Assets which lie inside the candidate ASAI

## Preamble

On 25<sup>th</sup> July 2017 Department consulted its statutory advisory body, the Historic Monuments Council on the identification of further areas of landscape to be included within the Area of Significant Archaeological Interest at Knockdhu. This ASAI was identified following desktop research and field survey carried out by Historic Environment Division. This statement relates to the entirety of the ASAI, a heritage asset of regional importance.



Department for  
**Communities**  
[www.communities-ni.gov.uk](http://www.communities-ni.gov.uk)

MEA-DPS-CR009

## Statement of Significance

### Knockdhu

An additional area of land has been identified for inclusion within the Knockdhu Area of Significant Archaeological Interest, to the north (focused on Scawt Hill with its scheduled hilltop cairn) and along the northeast and east of the current designated area.

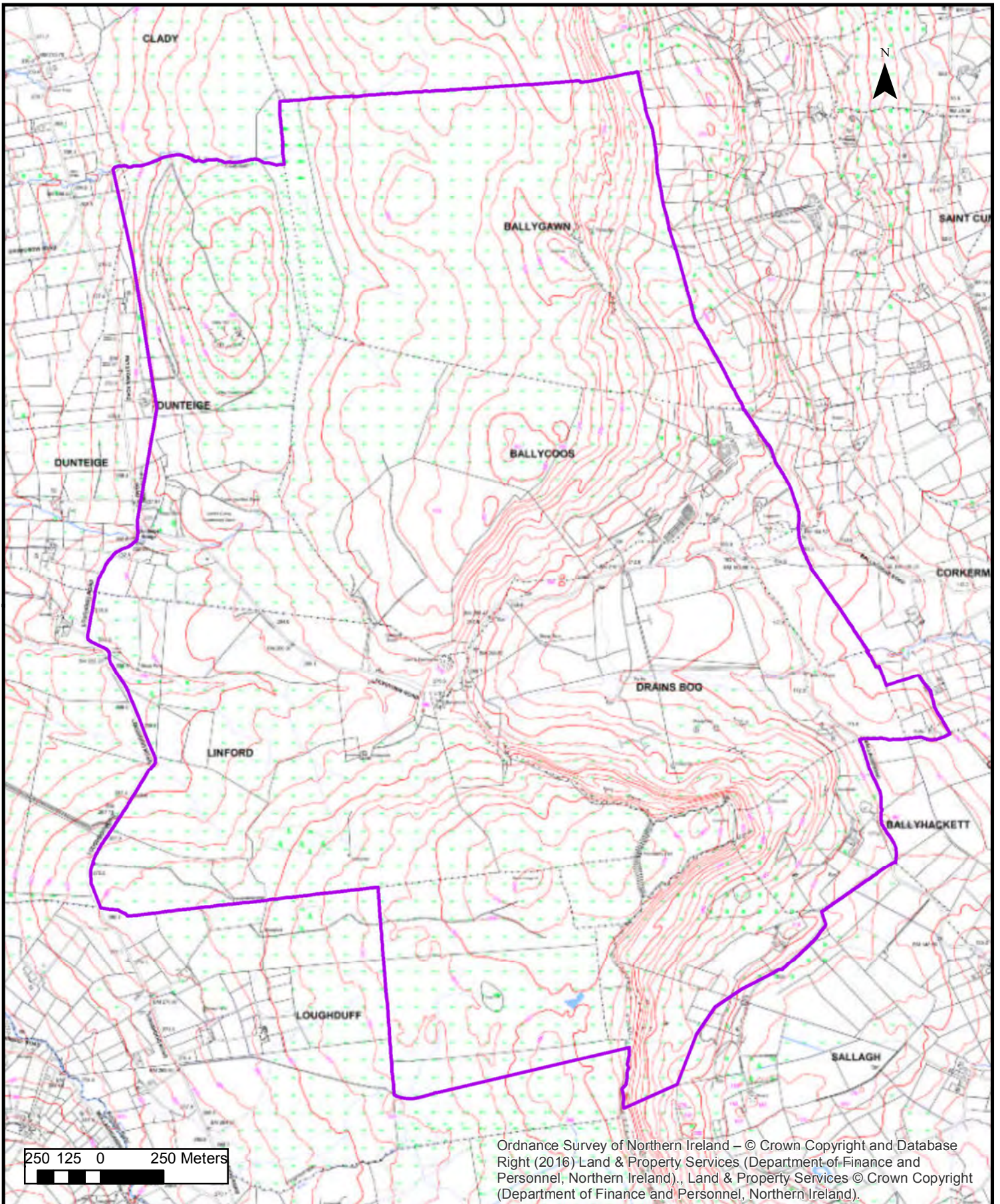
The unique historic upland landscape of Knockdhu contains a wide array of prehistoric and historic archaeological sites and monuments. At its southern extent it is dominated by the dramatically set, scheduled inland promontory fort at Knockdhu, which provides expansive views over the surrounding landscape. The interactions of this site with the historic landscape, including far ranging visuals toward other monuments, landforms, seascape and skylines, including the distinctive upland coastal topography and landscape of the Antrim Plateau as it meets and visually interacts with the Antrim Coast and Glens, are particularly important.

The Ulster Way, a regionally significant tourism asset which provides a unique public access to this ASAI, meanders from south to north through the landscape. The many heritage assets that the area contains have discrete and overlapping settings and their significance is enhanced by their relationships with each other, with historic routeways and boundaries and also with the surrounding environment, including its distinctive uplands, waterways and skylines. The evolution of historic townlands and place names in the district has also been influenced by natural landscape characteristics, the historic environment and historical associations.

The rugged, unimproved and dramatic upland landscape which contains a plethora of remains of historic human activity, the absence of modern development, and the wide ranging vistas, are key aspects of the character of the ASAI which contribute to its significance.

The landscape of the ASAI is sensitive to development that would adversely affect its distinctive qualities. The erection of masts, pylons, turbines and associated infrastructure, or other large scale development including large agricultural sheds or quarrying and mining activities within this distinctive landscape or adjacent to it may adversely impact the landscape character and the contribution it makes to the setting, experience and enjoyment of the rich spectrum of sites and monuments that lie within it.





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*1 Aerial view of the Linford Earthworks.*



*2 The rugged upland landscape is characterised by rough upland topography, mainly rough pasture, which has aided preservation of a huge array of heritage assets, from individual sites, to ancient land enclosures and routeways*



*3 An aerial view of the dramatic promontory fort at Knockdhu, which has commanding views over the surrounding land and seascape*

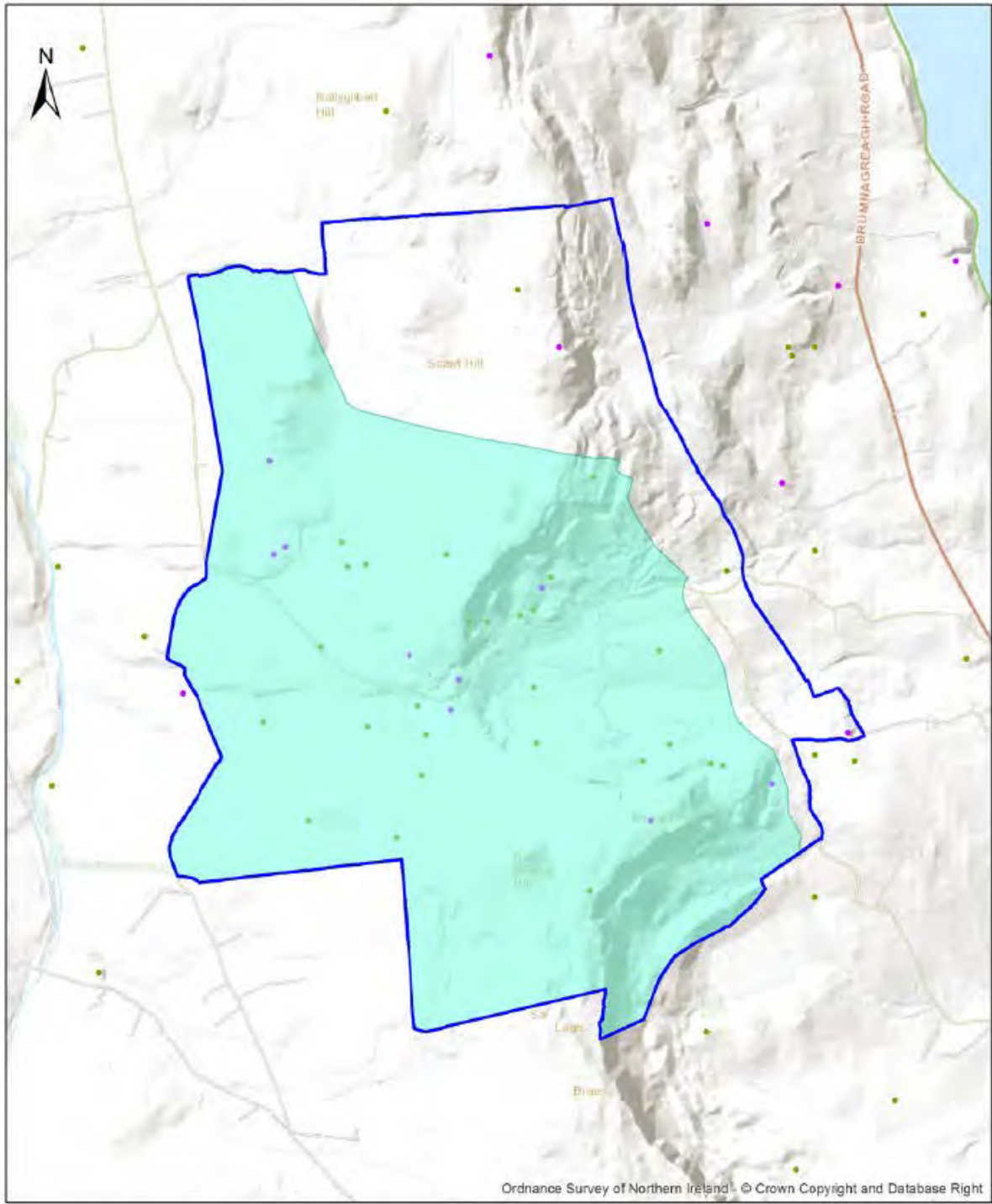


*4 There are a very wide variety of sites and monuments from a range of periods across this landscape, including this mass rock in Dunteige townland.*



*5 There are key unspoiled views and horizons in the distinctive landscape that allow an appreciation of its character*





0 150 300 600 900 1,200  
Meters

## Knockdhu ASAI

*Existing ASAI in turquoise*

- SMR
- SMR (Scheduled)
- SMR (State Care)

6 The extended ASAI is outlined in dark blue with the existing shaded in turquoise



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**MEA-DPS-CR009**

Sites and Monuments Records within Beaghmore ASAI 12 April 2018

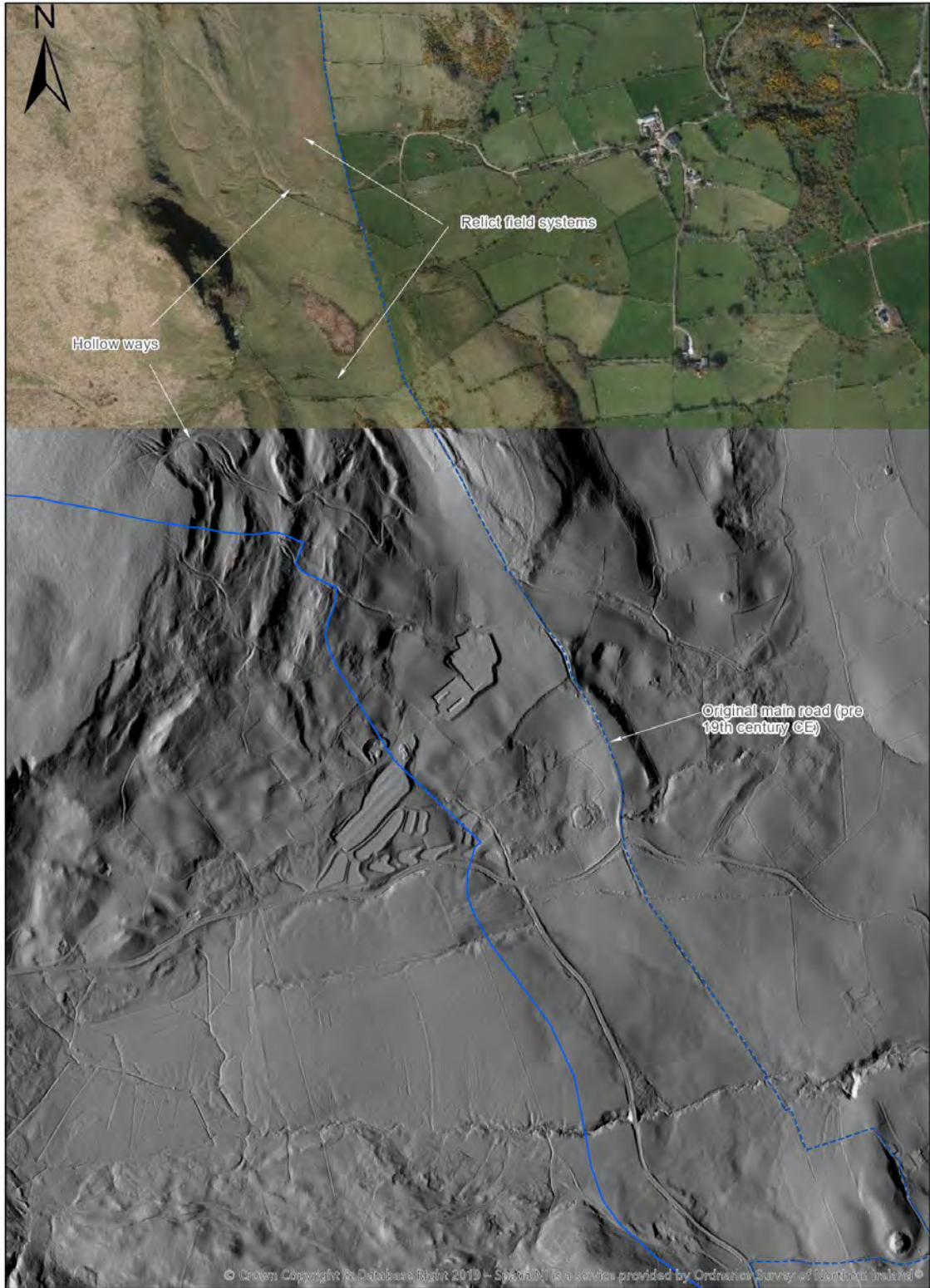
SMRNo	Type	Protection	Townland(s)	Grid Reference
ANT035:002	MEGALITHIC TOMB	Scheduled	DUNTEIGE	D3235007980
ANT035:003	CAIRN	Scheduled	LINFORD	D3326007370
ANT035:004	EARTHWORK	Scheduled	LINFORD	D3322007220
ANT035:005	PROMONTORY FORT	Scheduled	BALLYHACKETT; DRAINS BOG; LINFORD	D3420006680
ANT035:006	RATH		BALLYRUTHER	D3457007900
ANT035:013	MOTTE	Scheduled	CORKERMAIN	D3517007110
ANT035:030	MEGALITHIC TOMB	Scheduled	DUNTEIGE	D3233008440
ANT035:032	UNCERTAIN		LINFORD	D3310007100
ANT035:033	FIELD SYSTEM		DRAINS BOG	D3416006970
ANT035:034	SETTLEMENT SITE		DRAINS BOG	D3429007050
ANT035:044	A.P. SITE		BALLYGAWN	D3355009280
ANT035:045	A.P. SITE		BALLYCOOS	D3320007980
ANT035:048	A.P. SITE		BALLYHACKETT; SALLAGH	D3390006330
ANT035:053	CAIRN	Scheduled	BALLYGAWN	D3375009000
ANT035:063	CAIRN		LINFORD	D3258007530
ANT035:064	CAIRN Possible		BALLYCOOS	D3271007920
ANT035:065	MOUND		BALLYCOOS	D3280007930
ANT035:066	SETTLEMENT SITE		DRAINS BOG	D3424007510
ANT035:067	SETTLEMENT SITE		BALLYCOOS	D3363007710
ANT035:068	SETTLEMENT SITE		BALLYCOOS	D3356007680
ANT035:069	BANK		BALLYCOOS	D3371007870
ANT035:070	CAIRN		LINFORD	D3252006680
ANT035:071	SETTLEMENT SITE		DRAINS BOG	D3455006950
ANT035:072	SETTLEMENT SITE		DRAINS BOG	D3449006960
ANT035:073	SETTLEMENT SITE		DRAINS BOG	D3364007060
ANT035:074	SETTLEMENT SITE Possible		DRAINS BOG	D3295006590
ANT035:075	HUT SITE		BALLYCOOS	D3340007650
ANT035:076	HUT SITE		BALLYCOOS	D3331007650
ANT035:077	BARROW		BALLYCOOS	D3268008040
ANT035:078	ENCLOSURE		LINFORD	D3230007160
ANT035:079	HUT SITE		LINFORD	D3281007140
ANT035:080	SETTLEMENT SITE		LINFORD	D3308006900
ANT035:081	HUT SITE		BALLYCOOS	D3392008360
ANT035:082	CAIRN		LINFORD	D3306007240
ANT035:083	FIELD SYSTEM		DRAINS BOG	D3363007330
ANT035:001	PENAL SITE	Scheduled	DUNTEIGE	D3240708016

ANT035:031	STANDING STONE	Scheduled	LINFORD	D3301507486
ANT035:035	SOUTERRAIN	Scheduled	BALLYHACKETT	D3479106859
ANT035:061	FLINT QUARRY	Scheduled	BALLYCOOS	D3366807815





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Knockdhu ASAI  
Proposed ASAI extension

**IMAGES IN REFERENCE TO COUNTER REPRESENTATION WITH REGARD TO MEA-DPS-076**

**IMAGERY RECORDED BY HISTORIC ENVIRONMENT DIVISION, DURING FIELD INSPECTION, 24<sup>th</sup> May 2017**



Fig. 1 View of hollow ways/trackways leading to top of escarpment in the northern extension of the ASAI.





Fig. 2. View of eastern slopes within the northern extension across scars of routeways and evidence of pre- improvement farming.



Fig. 3 View of from top of basalt escarpment looking down slope within the north eastern part of the candidate ASAI. From mid to left of the image evidence was observed for pre-improvement farming, including cultivation, relict boundaries and routeways