

**JohnPaul Devlin**

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**From:** [REDACTED]  
**Sent:** 08 August 2019 11:53  
**To:** DevelopmentPlan@midulstercouncil.org  
**Cc:** [REDACTED]  
**Subject:** Mid Ulster draft plan strategy HED Counter Representation  
**Attachments:** HED Counter representation to MUDPS 51.pdf; HED SUBSTANTIVE RESPONSE COUNTER REPRESENTATION TO MUDPS 51.pdf; 1. Tullaghoge Statement of Significance.pdf; 2. Tullaghoge 2nd edition Ordnance Survey (1850s) with HED annotation.pdf; 3. MUDPS-51-Clyde-Shanks Gahan and Long Report Plate 1 with HED annotati....pdf; 4. HMC \_ASAI\_Tullaghoge.pdf

Dear Sir / Madam,  
**HISTORIC ENVIRONMENT DIVISION response to draft PLAN STRATEGY REPRESENTATIONS for COUNTER REPRESENTATIONS**

In accordance with Regulation 18 of the Planning (Local development Plan) Regulations (NI) 2015 please find attached a third HED counter representation, this in relation to MUDPS 51, with accompanying supporting documentation.

I would be grateful if you could confirm receipt

NOTE: Consent to Public Response

Under planning legislation we consent to the publication of our responses received in relation to the counter representation. However, we ask that the names, contact numbers and e-mail addresses of individuals named are redacted. We are content for the details of the Department/organisation to be published.

Yours sincerely

[REDACTED]

[REDACTED]

Senior Inspector of Historic Monuments | Heritage Records and Designations Branch

Historic Environment Division | Department for Communities

[REDACTED]

Contact: [REDACTED] Tel: [REDACTED] DD: [REDACTED]

**Mid Ulster District Council Local Development Plan 2030 - Draft Plan Strategy  
Submission of a Counter Representation**



Comhairle Ceantair  
**Lár Uladh**  
**Mid Ulster**  
District Council

**Local Development Plan  
Counter Representation Form  
Draft Plan Strategy**

Ref:  
Date Received:  
(For official use only)

Name of the Development Plan Document  
(DPD) to which this Counter representation relates

Draft Plan Strategy

**Counter Representations must be submitted by 5pm on Friday 9 August 2019 to:**

Development Plan Team  
Planning Department  
Mid Ulster District Council  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

Or by email to [developmentplan@midulstercouncil.org](mailto:developmentplan@midulstercouncil.org)

Please complete separate form for each counter representation.

**SECTION A**

**1. Personal Details**

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

Title

Mr

First Name

Last Name



Job Title

(where relevant)

Senior Inspector of Historic Monuments

Organisation  
(where relevant)

DfC Historic Environment Division

Address Line 1	Klondyke Building	
Line 2	Cromac Avenue	
Line 3	Gasworks Business Park	
Line 4	Malone Lower BELFAST Co. Antrim	
Post Code	BT7 2JA	
Telephone Number		
E-mail Address		

**SECTION B**

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3(a). Have you submitted a representation to the Council regarding this development plan document?

Yes  Y  No

3(b). If yes, please provide Reference No. and summary of issue raised in you representation.

<p>MUDPS/77</p> <p>Issues raised around soundness of policy approach in the draft Plan Strategy toward the Historic Environment</p>
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**Counter Representation**

Any person may make a counter representation in relation to a representation seeking a change to a DPD. The purpose of a counter representation is to provide an opportunity to respond to proposed changes to the DPD 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 a DPD.**

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

MUDPS/51

5. Please give reasons for your counter representation having particular regard to the soundness test identified in the above representation.

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.

MUDPS/51 does not make any reference to the soundness tests. HED have submitted (attached) a counter-representation contesting the proposed reduction of the ASAI area put forward in the representation.

*(If not submitting via online form and additional space is required, please continue on a separate sheet)*

Signature

[Redacted Signature]

Date

8th August 2019





### Historic Environment Division

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

Date: 7<sup>th</sup> August 2019

### HISTORIC ENVIRONMENT DIVISION: COUNTER REPRESENTATION TO MUDPS/51

Historic Environment Division (HED) have considered the representation made by Clyde Shanks Planning Development, and the associated ASAI assessment report in Annex 2 of the representation by Gahan and Long Ltd (MUDPS/51), hereafter referred to as Gahan and Long Assessment. We disagree with the representation's proposed exclusion of a portion of land at Tullywiggan from the Tullaghoge ASAI, and with the proposed alternate boundary put forward. The representation seeks the zoning of an area of the parcel of land in question for the purposes of housing development. We advise that housing on this area of land will impact the distinctive area of historic landscape that the ASAI has identified, including the setting of one of the monuments therein, which would be inconsistent with strategic policy, as well as the council's draft policies. We note that representation MUDPS/51 makes no reference to the soundness criteria but we nonetheless make our comments to show that the identification of the Area of Significant Archaeological Interest has been sound, is in accordance with the SPPS 6.29, and is based on robust evidence.

HED advise our previous comments, on the soundness of the historic environment policy approach in the draft plan strategy, remain unchanged (see ref: MUDPS/77). In some of those comments we have advised the council that their language in relation to the designation of ASAI should be more closely aligned to the language in the Strategic Planning Policy Statement (SPPS) where section 6.29, -bullet point 2, refers to the designation of ASAI.

*".....Where appropriate LDPs should designate Areas of Significant Archaeological Interest (ASAI). 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."* (text emboldened by HED)

The above language in SPPS is important as it explains the rationale for the identification and designation of ASAI, and is the rationale which has been used in the identification of the ASAI at Tullaghoge. The ASAI has therefore been identified for the qualities above stated, and not to "prevent development" as articulated on page 4, Section 2, in the Gahan and Long assessment (See also Section 5). This phraseology applied in the assessment demonstrates a lack of understanding as to the policy context and reasoning for the identification of ASAI. Soundness test CE2 relates to the strategies, policies and allocations of the plan being robust and appropriate having considered the relevant alternatives and being founded on a robust

evidence base. HED advise that our identification of the Tullaghoge ASAI meets the soundness test.

Footnote 14, (SPPS, page 43) 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.

In accordance with the SPPS 6.29, and footnote 14, Historic Environment Division consulted with the Historic Monuments Council with regard to the identification of the ASAI at Tullaghoge 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 March 2018. This statement, which was included within Appendix 2 of the council's Preferred Options Paper Public Consultation Report January 2019, outlines distinctive qualities of the ASAI, and also considers types of development which would have 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 heritage assets currently recorded in the area of landscape concerned.

HED advise that the identification of the ASAI was informed by robust evidence incorporating:

- 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 sites listed within the ASAI, along with associated detailed scanned documentation, can be reviewed using this database
- GIS analysis, including view shed analysis. This has been of particular importance in helping inform the definition of the ASAI to reflect the distinctive area of 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-historic-environment> .
- Reference to the Northern Ireland Landscape Character Assessment 2000 (particularly LCA 42, Cookstown farmlands <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/environment-land-information-NI-landscape-character-assessment-cookstown-2006.pdf> and The Northern Ireland Regional Landscape Character Assessment 2015 (Area 11 West Lough Neagh Drumlins) <https://daera-ni.maps.arcgis.com/apps/MapJournal/index.html?appid=dee491ff43c0415fbb986f74c92f39a9>
- Field inspection to better understand the visual and wider historic landscape setting of the State Care Monument and other monuments in the landscape.

As well as Tullaghoge Fort itself the ASAI incorporates additional individual and related sites and monuments, with discrete and overlapping settings, whose significance is enhanced by their relationships with each other and the surrounding landscape.

We advise that the boundary lines of the ASAI, as well as considering spatial distribution of heritage assets, landscape and view shed analysis, have been carefully considered and have been informed by examination of historic landscape characteristics including natural features, contour lines and roads and routeways and historic boundaries, including townland boundaries. The landscape area, including its boundaries, is therefore clearly based on historic landscape attributes. We advise this to be sound in line with CE2



Section 4 of the Gahan and Long assessment (page 5) states that the boundary follows a modern lane and that there is no apparent reason for the ASAI boundary having been laid along this. In fact this lane follows and projects out from and on the line of a boundary which is shown on the 2<sup>nd</sup> edition Ordnance Survey map, the use of which partly informed our analysis of historic landscape characteristics for the Tullaghoge ASAI. The boundary almost certainly predates the available cartographic evidence and is a part of the historic landscape evolution. (Field and property boundaries were generally not mapped at the time the 1<sup>st</sup> edition maps for most of the Ulster counties were compiled; the surveyors were not instructed to do so by the OS, due partly to the fact that, initially at least, it was thought that depicting such divisions would require a much larger scale of map.) At this location the definition of the ASAI recognises the historic rural landscape setting around the rath TYR 038:017, including views to the monument which has its own distinct setting as well as a setting related to other monuments in the ASAI.

It also considers the historic road layout and views from the road at this location to both the rath and to Tullaghoge itself. Section 4 of the Gahan and Long assessment, paragraph 4 says that "Tullaghoge Fort is not visible from these roads (including Tullywiggan Road), where they interact with the site (i.e. The proposed zoning for housing)". This is demonstrably untrue. Not only are both Tullaghoge Fort and the rath TYR 38:17 both visible from the Tullywiggan Road at this location, the historic path of the road appears aligned directly with Tullaghoge at this location. Part of Tullaghoge Fort is actually visible in the right hand corner of Plate 1 in the Gahan and Long assessment. (See annotated extract attached), and the visual and contextual relationship is extremely clear on the ground.

We advise that the approach in the Gahan and Long assessment, to the analysis of setting for the rath TYR 038:017 is an oversimplification and fails to fully address the physical and visual aspect of the monument. The rath is set on top of a prominent drumlin immediately north of the Killymoon River, and the drumlin is critical to the setting of the rath and by extension within the Tullaghoge ASAI. The proposed redefinition of the ASAI on page 7 of the Gahan and Long assessment does not take account of the lower part of the drumlin which is summited by the rath. Further the report does not consider evidence such as the historic rural setting of the rath, or views to the site, including those from public roads, or the pertinence of the views from the Tullywiggan Road which allow an aspect which includes both the rath and Tullaghoge itself, articulating their visual context and relationship in the landscape with each other. The proposed redefinition is therefore unsound in accordance with CE2 as it does not sufficiently consider the rationale for the definition of the ASAI or give adequate consideration to the distinctive and related settings of the monuments.

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

- a Copy of the Statement Significance for the Tullaghoge ASAI
- A copy extract from the second edition Ordnance Survey map highlighting the historic boundary line upon which the ASAI at this location is based
- Extract from the Gahan and Long assessment with annotations by HED highlighting the position of the rath TYR 38:17 and Tullaghoge Fort.
- Letter from the Historic Monuments Council supporting the identification of the ASAI.

In conclusion Historic Environment Division advise that the Tullaghoge ASAI has been identified on the basis of robust and up to date evidence in accordance with CE2 and that its identification is compliant with the requirements of the SPPS. We advise that redrawing and zoning this area of the ASAI for housing, as proposed by Clyde Shanks would fundamentally and adversely impact the setting of the fort TYR 38:17. If the area were developed it would have adverse consequences on the historic rural landscape which forms a key part of the approach to



Tullaghoge Fort from the north, and have a harmful negative impact on an important view from the Tullywiggan road at this point, which includes both the rath TYR 038:017 in its rural historic context and the State Care Monument. This would adversely impact how the ASAI landscape and the context of the monuments within it are seen, understood, experienced and enjoyed.

Finally we refer to our comments in our own representation (MUDPS/ 77), in relation to the wording of local bespoke policy for the protection of each ASAI, in line with requirements of SPPS 6.29, and in line with previous practice.

# TULLAGHOGE CANDIDATE AREA OF SIGNIFICANT ARCHAEOLOGICAL INTEREST



Prepared by DfC Historic Environment Division  
Heritage Records and Designations Branch



## Contents

1. Preamble
2. Statement of Significance
3. Map
- 4-6. Selected imagery
- 7-9. 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 an Area of Significant Archaeological Interest at Tullaghoge. This ASAI was identified following desktop research and field survey carried out by Historic Environment Division.



## Statement of Significance

### Tullaghoge

An Area of Significant Archaeological Interest has been identified at Tullaghoge. Tullaghoge Fort is a monument in State Care, managed by the Department for Communities. The distinctive landscape included within the identified area makes an important contribution to the setting, experience and understanding of the State Care Monument, and of the other heritage assets that are located within it. The landscape incorporates rolling countryside with distinct hills, part of the Killymoon River valley with the river running through it, and intermittent areas of planted woodland, with large open spaces. The area includes the designed landscape of the Loughry Demesne, which was documented in 1611 as the “manor of Tullaghoge”, and skirts the northern edge of the settlement of Tullaghoge, which has an identified Area of Archaeological Potential.

In the medieval and early modern periods Tullaghoge fort was the inauguration place for the northern branch of the O’Neills. The history of the landscape and its evolution can be traced from the Mesolithic period through to the present day. An important characteristic of the area are the vistas from and toward the fort. From the fort these include important localised and wide views, including views toward other heritage assets. The views from the many roads and approaches which traverse and then converge in this landscape at a river crossing close to and west of the monument, which was historically a place of gathering and ritual, have a particular significance. The prehistoric and historic heritage assets within the ASAI have both discrete and overlapping settings and their significance is enhanced by their relationships with each other and also with the natural environment. The place names of the area have been influenced by both its natural landscape characteristics and the historic environment.

The landscape is sensitive to changes that would adversely impact these distinctive qualities. Large scale development, quarrying, high structures such as wind turbines or mast/pylon infrastructure, or development which interrupts views of the fort from along the surrounding roads, would adversely impact the distinct character of the landscape and the contribution it makes to the enjoyment of the heritage assets that lie inside it.

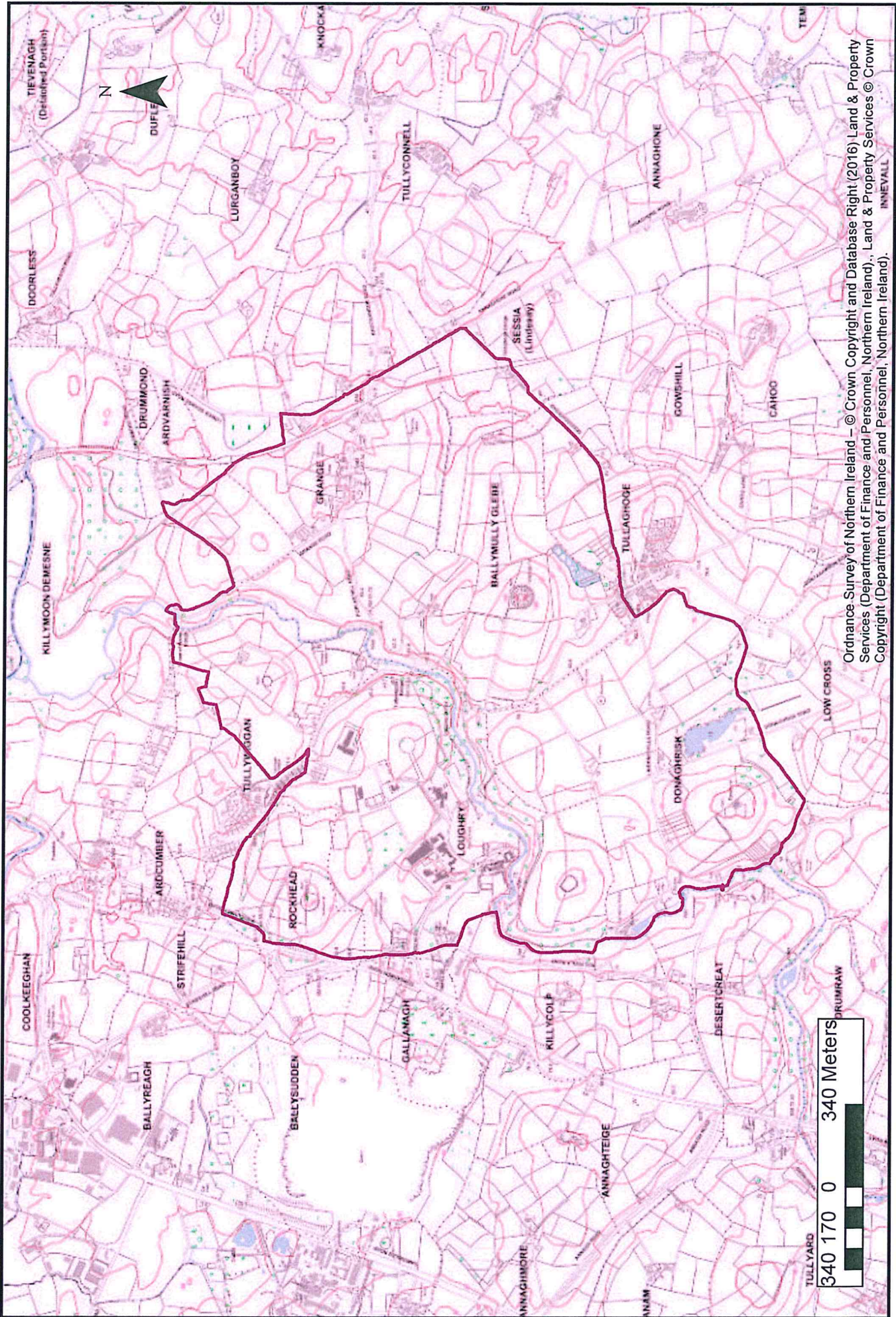


Department for

**Communities**

[www.communities-ni.gov.uk](http://www.communities-ni.gov.uk)

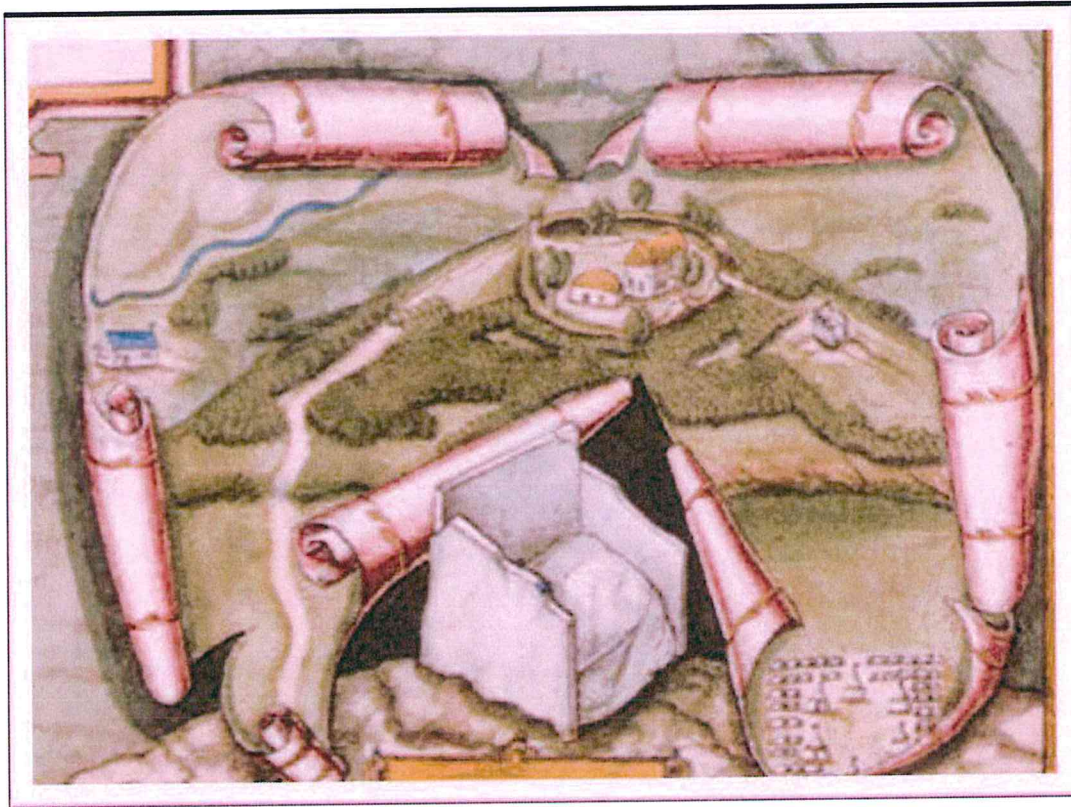




Ordnance Survey of Northern Ireland – © Crown Copyright and Database Right (2016) Land & Property Services (Department of Finance and Personnel, Northern Ireland), Land & Property Services © Crown Copyright (Department of Finance and Personnel, Northern Ireland).

INNEVALL





1 Extract from Bartlett's 1602-1603 maps showing Tullaghoge fort and its partially wooded surroundings



2 A place of gathering, Tullaghoge fort is a dominant visible feature from many of the surrounding historic roads.



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





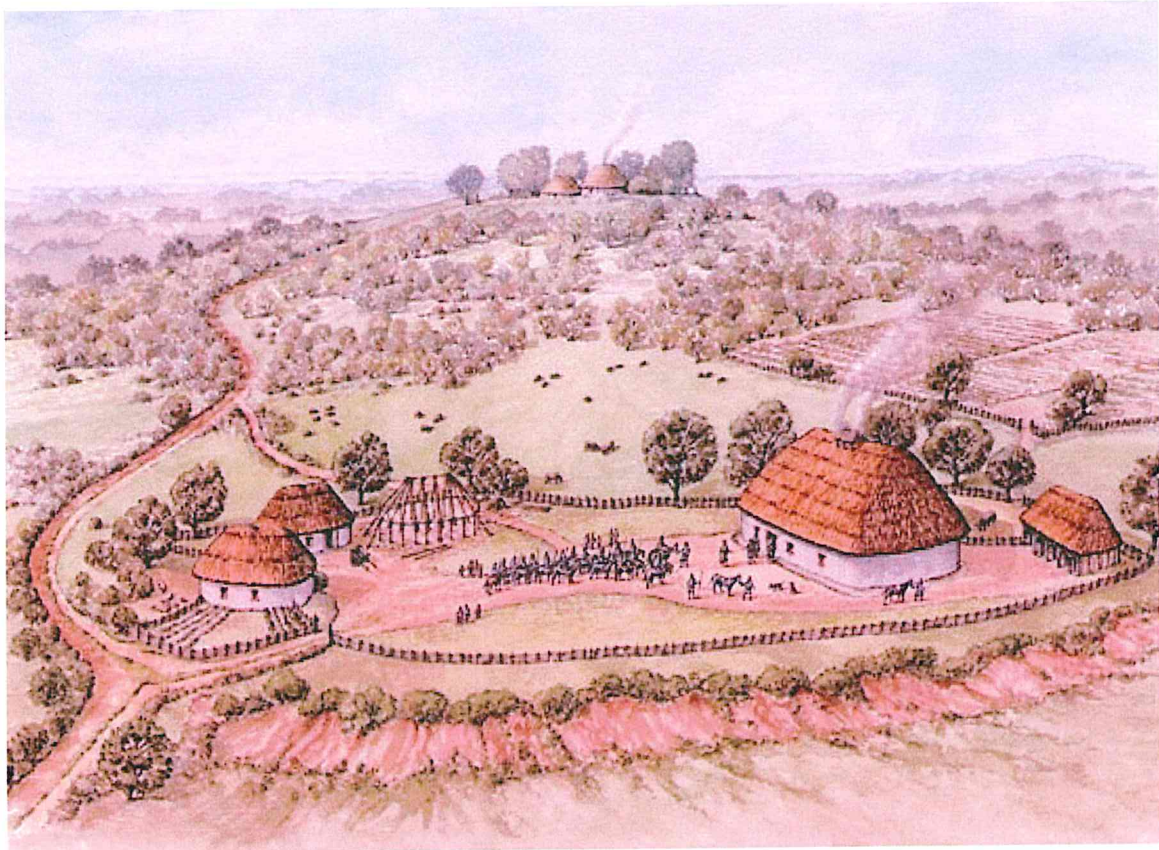
3 Aerial view of part of the Tullaghoge landscape from south-west showing the fort, the settlement and interspersed areas of woodland



4 A key aspect of this site is its interaction with the surrounding landscape and skylines



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



5 A reconstruction drawing of the environs of Tullaghoge Fort based on historical sources and excavated evidence



Sites and Monuments Records within Tullaghoge ASAI 8<sup>th</sup> March 2018

SMRNo	Type	Protection	Townland/s	Grid_Reference
TYR038:013	COUNTERSCARP RATH	Scheduled	LOUGHRY	H8132074100
TYR038:014	GRAVEYARD		DONAGHRISK	H8207073970
TYR038:015	FRIAR'S WELL. HOLY WELL: FRIAR'S WELL		DONAGHRISK	H8216074050
TYR038:016	TULLAGHOGE FORT. HILLTOP ENCLOSURE & INAUGURATION SITE OF THE O'NEILLS: TULLAGHOGE FORT	State Care and Scheduled	BALLYMULLY GLEBE	H8250074300
TYR038:017	RATH		TULLYWIGGAN	H8214075360
TYR038:020	GIANT'S GRAVE. WEDGE TOMB: GIANT'S GRAVE	Scheduled	LOUGHRY	H8124074870
TYR038:021	ENCLOSURE		DONAGHRISK	H8180074280
TYR038:023	TREE RING		DONAGHRISK	H8161073420
TYR038:026	TREE PLANTATION		ROCKHEAD	H8123075170
TYR038:030	CIST BURIAL		LOUGHRY	H8116074840
TYR038:038	A.P. SITE - circular cropmark		DONAGHRISK	H8204073750
TYR039:020	GRANGE STANDING STONE. STANDING STONE	State Care and Scheduled	GRANGE	H8317074770
TYR039:021	GRANGE STANDING STONE PAIR. STANDING STONES (2)	State Care and Scheduled	GRANGE	H8307075140
TYR038:047	BRONZE AGE SETTLEMENT & RING DITCH	Scheduled	LOUGHRY	
TYR038:049	FORTIFIED HOUSE		LOUGHRY	



Department for  
**Communities**

[www.communities-ni.gov.uk](http://www.communities-ni.gov.uk)

Industrial Heritage Records within Tullaghoge ASAI 8<sup>th</sup> March 2018

County	Townland/s	IHR no.	Grid Reference	TYPE
Tyrone	Grange	02338:013:00	H83307493	Bridge
Tyrone	Killymoon Demesne / Tullywiggan	04853:000:00	H82387572	Bridge
Tyrone	Tullywiggan	04854:000:00	H82427554	Corn & Flax Mill site
Tyrone	Tullywiggan	04855:000:00	H82317509	Flax Mill & Corn Mill site
Tyrone	Loughry / Grange	04856:000:00	H82207474	Bridge
Tyrone	Loughry	04857:000:00	H82177467	Beetling Mill (in ruins)
Tyrone	Loughry	04858:000:00	H81757450	Corn Mill & Kiln
Tyrone	Loughry	04859:000:00	H81677450	Bridge
Tyrone	Desertcreat / Donaghrisk	04860:000:00	H81297346	Bridge
Tyrone	Donaghrisk	04884:000:00	H81957342	Limestone & Freestone Quarry & Limekilns
Tyrone	Donaghrisk	04885:000:00	H82207343	Limestone & Freestone Quarry & Limekiln
Tyrone	Donaghrisk	04890:000:00	H81127386	Bleach Mill - Weaving Factory - Flax Mill site

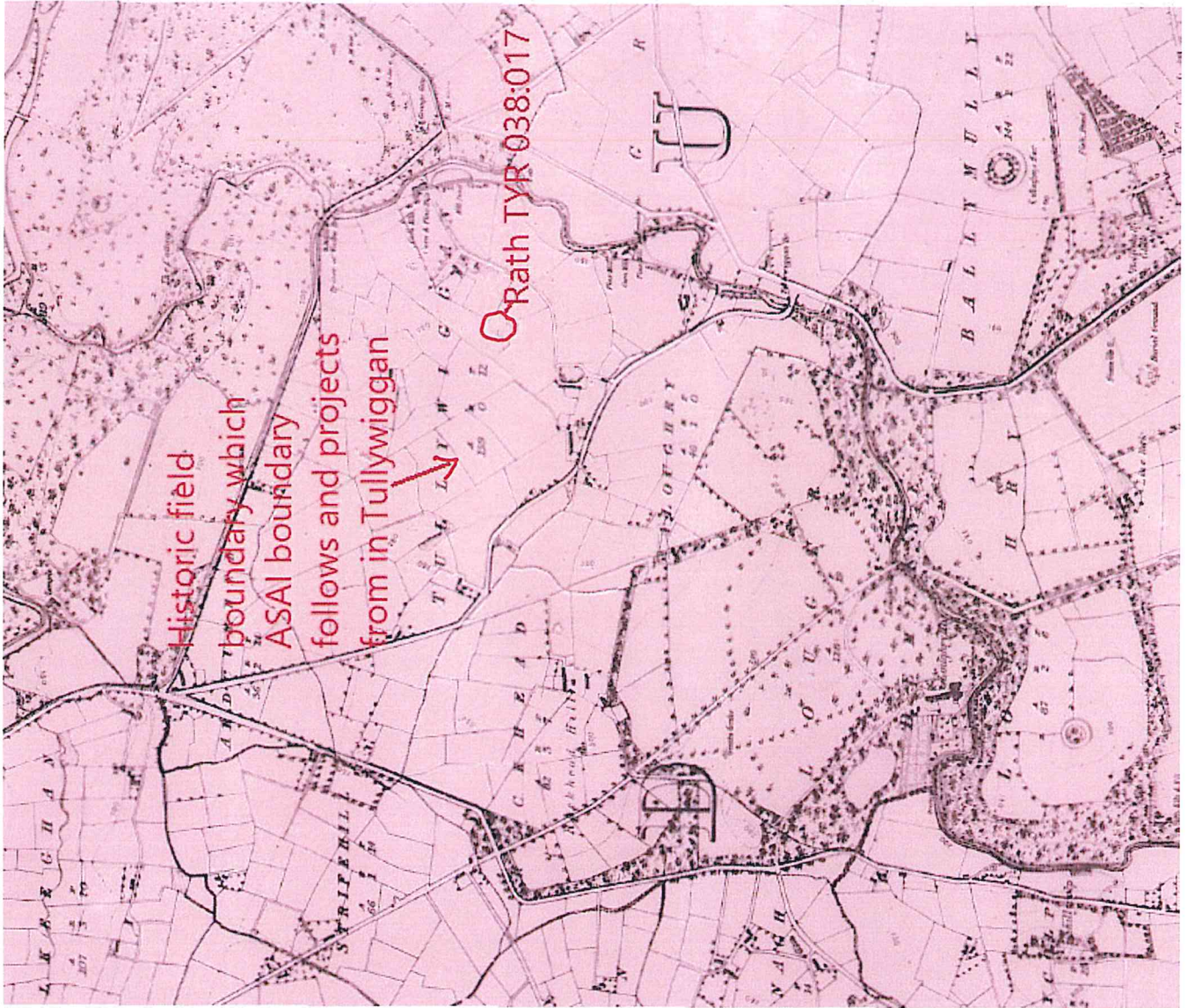
Listed Historic Building assets within the Tullaghoge ASAI 8<sup>th</sup> March 2018

HB Ref	Date of Construction (where identified)	Townland	Current Use	Former Use	Grid Reference	Current Grade
HB09/05/027	1880 - 1899	Donaghrisk	Orange Hall,	House	H8134 7348	B2
HB09/05/024	1860-1879	Grange	Bridge	Bridge	H8330 7494	B2
HB09/05/030	1820 - 1839	Loughry / Ballymully	Bridge	Bridge	H8220 7475	B2
HB09/05/006			House	House	H8205 7375	B1
HB09/05/007	1820 - 1839	Donaghrisk	House	House	H8125 7368	Record Only
HB09/05/020 A	1740-1759	Loughry	University	Country House	H8140 7440	B1
HB09/05/020 B			University /College	University /College		Record Only
HB09/05/020 C	1820 - 1839	Loughry	Garden Features	Garden Features	H8142 7432	B2
HB09/05/029 A	1840 - 1859	Donaghrisk	House - Terrace	House - Terrace	H8142 7328	B1
HB09/05/029 B	1840 - 1859	Donaghrisk	House - Terrace	House - Terrace	H8143 7327	B1
HB09/05/029 C	1840 - 1859	Donaghrisk	Hotel - Terrace	Hotel - Terrace	H8145 7326	B1
HB09/05/029 D	1840 - 1859	Donaghrisk	House - Terrace	House - Terrace	H8145 7325	B1
HB09/05/029 E	1840 - 1859	Donaghrisk	House - Terrace	House - Terrace	H8146 7324	B1
HB09/05/029 F	1840 - 1859	Donaghrisk	House - Terrace	House - Terrace	H8147 7323	B1

Historic Parks Gardens and Demesnes within or intersecting Tullaghoge ASAI 8<sup>th</sup> March 2018

REF_NO	SITE	STATUS
T-026	LOUGHRY	REGISTER
T-024	KILLYMOON CASTLE	REGISTER



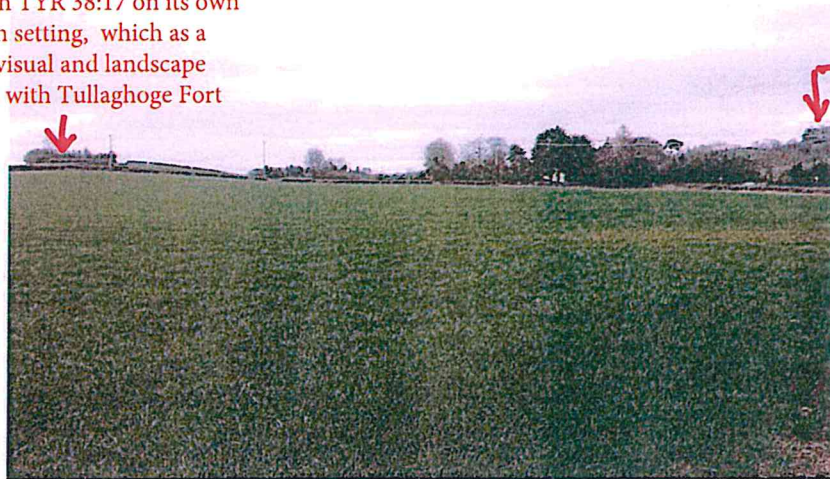


Historic field boundary which ASAL boundary follows and projects from in Tullywiggan

Rath TYR 038:017



The rath TYR 38:17 on its own drumlin setting, which as a strong visual and landscape context with Tullaghoge Fort



**HED ANNOTATION**  
This is the edge of Tullaghoge Fort, which along with TYR 38:17 is clearly visible from the Tullywiggan Road adjacent to this field

Plate 1: looking southeast across the Site with TYR 38:17 on the left hand horizon.

#### 4 Inclusion within ASAI

Having examined the available desk top information there is no definitive reason as to why the Site is included within the proposed boundary for the ASAI. The ASAI boundary extends along the southern/western boundary of the Site, following the route of the Tullywiggan Road. While this road is an historic route shown on the 1<sup>st</sup> edition OS map, the impression is that, in this instance, it has been used to allow the ASAI to navigate around the residential properties which straddle the road in the area. The route of the ASAI then extends northeast along the side of the Site. There is no apparent historical reason for this section and indeed it appears to follow a modern lane accessing the bio-digestion plant to the north of the Site.

The monument TYR 38:17 is located on a drumlin top, overlooking the Site from the east. It is possible that the inclusion of the Site within the ASAI is a reflection of the historic viewshed from this monument. However the view in this direction from the monument is of the existing residential properties and the Mid Ulster Sports Centre (plate 2).



Plate 2: view west from monument TYR 38:17.

An advisory Council to the  
Department for Communities  
Level 6, Causeway Exchange  
1-7 Bedford Street  
Townparks  
Belfast  
BT2 7EC

Tel: [REDACTED]  
[HED.Secretariat@communities-ni.gov.uk](mailto:HED.Secretariat@communities-ni.gov.uk)



Prof. [REDACTED]  
Chairman

Sinead McEvoy, Head of Development Plan and Enforcement  
Planning Department, Mid Ulster District Council  
Magherafelt Office, 50 Ballyronan Road  
Magherafelt, Co. Derry BT45 6EN  
10 - 4 - 2018

Dear Ms McEvoy,

I am writing on behalf of the Historic Monuments Council to support the inclusion of the Tullaghoge candidate Area of Significant Archaeological Interest (ASAI) in the Mid Ulster District Council Local Development Plan. A Statement of Significance for this candidate ASAI was recently submitted to Mid Ulster District Council by the Historic Environment Division, Department for Communities.

The Historic Monuments Council (HMC) is a statutory body appointed to advise the Department for Communities on the exercise of its powers under the Historic Monuments and Archaeological Objects (NI) Order 1995. It is consulted by the Department in relation to policy, the Scheduling of Monuments, Monuments in State Care **and the identification of Areas of Significant Archaeological Interest (ASAI)s**. Membership of the Council is diverse, representing a wide range of public interests complemented by a number of senior archaeologists (including the Chair) with professional and heritage management expertise.

The Strategic Planning Policy Statement (6.29) requires that local authorities, where appropriate, designate ASAI's in their Local Development Plans (LDPs) to identify particularly distinctive areas of historic landscape in Northern Ireland. These areas are likely to include a number of individual and related monuments and may also be distinguished by their landscape character and topography. The SPPS further outlines that the Department of Communities' statutory consultation body, the HMC, be consulted on the identification of ASAI's. Local policies for the protection of the overall character and integrity of these distinctive areas should be included in LDPs where relevant.

You will be aware that working in partnership with the Historic Environment Division, Department for Communities Mid Ulster Council has made a significant investment in making the Tullaghoge State Care Monument accessible for public value and enjoyment and in doing so has demonstrated to importance and further potential of Tullaghoge as a heritage asset for the Council. In this context it is both appropriate and timely that the quality of the distinctive landscape included within the candidate ASAI, which makes an important contribution to the setting, experience and understanding of the State Care Monument and of the other heritage assets located within it, should be protected through its designation as an Area of Significant Archaeological Interest.



As chair of the Historic Monuments Council (HMC) I wish to formally state that we have been fully consulted by the Historic Environment Division on the Tullaghoge candidate ASAI. This consultation included a discussion in the field in the summer of 2017. The Historic Monuments Council is content that the Tullaghoge ASAI fulfils the criteria for ASAIs set out above. The Historic Monuments Council approves the designation of this ASAI and supports and strongly recommends its inclusion in the Mid Ulster District Council Local Development Plan.

Yours sincerely

