

TECHNICAL APPENDIX 10.3

Historic Environment Scotland Response

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November 2019



17 December 2018

Alison Baisden
Historic Environment Scotland
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Our Ref: ECU00000409

Your Ref: AMN/16/GB

Dear Ms Baisden

**RE: THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2000
CLASHINDARROCH II WIND FARM
REVISED SCOPING REPORT RESPONSE**

Thank you for your helpful response to the above revised scoping report consultation. This letter forms our reply to your response.

- *Tap O' Noth, fort (Scheduled Monument, Index No. 63).*

With respect to the requested visualisations, we are planning to use a photomontage and wireline from the summit of the fort at the trig point or other location close by and on the ramparts of the fort. We will also generate a wireframe for a location on the track that approaches the summit of the fort.

In addition to the photomontage and wireframe location at the Minor Road near Backside (VP2) we will be creating a wireframe and photomontage at the Craw Stane (see below): although principally selected for the assessment of potential impacts on that scheduled monument, this location would be inter-visible with Tap O' Noth and this visualisation would therefore also be considered in the assessment of potential setting impacts on Tap O' Noth.

- *Nether Wheedlemont, Stone Circle 80m NNE of, (Scheduled Monument, Index No. 36).*

There appears to have been some confusion with respect to the scheduled monument referred to in the scoping report. Nether Wheedlemont is the monument that is being referred to in the Re-Scoping Report (October 2018). It is intended that a wireframe visualisation will be used in the assessment of potential setting impacts on this asset. A photomontage would not be an appropriate aid to assessment for this asset as there is intervening forestry sufficiently close to the asset to obscure the proposed development.

- *Ord, Stone Circle 635m WSW of, (Scheduled Monument, Index No. 51).*

The stone circle at Ord has been named in confusion for the Nether Wheedlemont scheduled monument above. Assessment of potential setting impacts on this asset will, however, be included in the EIA. Preliminary assessment of the setting of the stone circle indicates that the principal elements of the setting are landscape forms and other heritage assets in the near

vicinity of the asset. We do not, therefore, believe at this stage that a photomontage would be an appropriate component of assessment. A wireline will be employed to illustrate the assessment.

- *Craw Stane, symbol stone and enclosure, 575m E of Mains of Rhynie, (Scheduled Monument, Index No. 69).*

As part of the assessment of potential setting impacts on the Craw Stane scheduled monument, a photomontage as well as wireframe, will be employed for assessment and illustration.

- *Gallows Hill Cairn, 460m SSE of Lesmoir, (Scheduled Monument, Index No. 11576).*

Assessment against the current ZTV model suggests that there will be limited inter-visibility with the proposed development, with some turbine blades being visible. A wireframe may be employed as part of the assessment, subject to the outcome of a site visit.

With respect to further consideration of heritage assets that are not within the ZTV, we acknowledge the theoretical possibility of a heritage asset being caught in views with the proposed development when viewed from a third location, despite there being no inter-visibility from the heritage asset itself. In practice, this is only likely to emerge as an issue with assets that are relatively close to the proposed development, in order for there to be a reasonable prospect that the location of the heritage asset and the proposed development could be viewed together, and that the heritage asset itself would actually be discernible. The heritage assets that are outside of the ZTV will more frequently tend to be hard to discern at distance, as they are unlikely to be in topographically prominent locations. In the case of the proposed development the ZTV model indicates that there are few, if any, locations where both the proposed development would be visible in locations where a designated heritage asset would be discernible.

With respect to the particular example of Beldorney Castle (LB9164), this asset is topographically screened and has significant close permanent woodland planting that would prevent a situation where the asset and the proposed development would be simultaneously visible from a third location.

We would be happy to undertake joint site visits to discuss your concerns and to agree likely visibility at locations for any of the sites.

We think that this constitutes a reasonable approach to the issues of assessing potential setting impacts on the heritage assets within the remit of Historic Environment Scotland. Should you have any queries please do not hesitate to contact me.

Yours sincerely,

Dr Steve Lancaster
Associate Archaeologist,
SLR Consulting Ltd.



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: lesley.tosun@gov.scot

Ms Lesley Tosun
Energy Consents Unit
4th Floor
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our ref: AMN/16/GB
Our case ID: 300019748
Your ref: ECU00000409

09 November 2018

Dear Ms Tosun,

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000
Clashindarroch II Wind Farm
Revised Scoping Report**

Thank you for your consultation which we received on 19 October 2018 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

Aberdeenshire Council's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Revised Scope of Assessment

We understand that this Revised Scoping Report has been submitted following a change to the layout of the proposed Clashindarroch II wind farm development, now consisting of 14 wind turbines (tip height: 180m) and associated infrastructure near Huntly in Aberdeenshire. We note that this change involves increasing the turbine heights for the development by over 30m.

While there are no heritage assets within our statutory remit located within the development site boundary which may be affected by changes to the development layout, we consider that an increase to the turbine heights may give rise to impacts on the setting of a number of such heritage assets located in the vicinity. Most notably, we agree with the findings of the Revised Scoping Report which state a particular



requirement to assess impacts on the *Tap o'Noth, fort (Scheduled Monument, Index No. 63)* as part of any Environmental Impact Assessment for the proposed development.

- *Tap o'Noth, fort (Scheduled Monument, Index No. 63)*

We have concerns about the potential adverse impact on the setting of this monument. This Iron Age site is described as being one of the largest and most spectacular forts in Scotland. It covers a large area and the existing Clashindarroch wind farm is highly visible from it. While that development comprises 18 x 110m turbines, the proposed extension spreads the development further towards the NE, but would also introduce much higher turbines than those which have been previously consented.

Given these concerns, we would welcome the opportunity to view provisional wireframes and photomontages in advance of any planning application. Should the placement and height of the proposed new turbines have an adverse impact on the setting of the fort, we would strongly advocate that mitigation measures are put in place that lessen the impact. This could include reconsidering the layout and reducing the height of turbines. We would be happy to meet on site to discuss these concerns if that would be helpful.

The current 110m turbines are highly visible from the summit of the fort, and from various points as one approaches and leaves the fort along the track that winds around it. Therefore any assessment should consider this aspect and illustrate it with photomontages and wireframes, such as (i) one taken from the fort summit at the trig point looking towards the turbines, and (ii) one taken from a place along the track that demonstrates the impact of approaching the summit of the fort.

Further consideration should also be given to assessing the potential impact on the fort in views towards it with turbines potentially appearing it, and this should be supported with photomontages and wireframes. We note that a proposed location at the Minor Road near Backside (VP 2) located to the NW has already been identified. However, other locations in the vicinity of the fort demonstrating the potential impact on views looking towards it should also be considered.

We welcome that the potential impact on the setting of the fort is being considered from further afield, such as Mither Tap fort (SM 2114) as the two forts are intervisible with one another. We would welcome sight of the wireframe to assess what the potential impact is likely to be.



The cumulative impact of the existing and proposed wind farms on the setting of the fort should also be assessed and illustrated.

We also welcome the intention set out within the Revised Scoping Report to assess impacts on the setting of the following heritage assets within our remit which may be affected following an increase to the turbine heights.

- *Ord, stone circle 635m WSW of (Scheduled Monument, Index no. 51)*

The Revised Scoping Report refers to 'Wheedlemont stone circle'; we assume that this is Ord stone circle which comprises two standing stones which are situated at the SW foot of Ord Hill, 230m AOD. We note that a wireframe is being produced. We would suggest that this also includes a photomontage.

- *Craw Stane, symbol stone and enclosure 575m E of Mains of Rhynie (Scheduled Monument, Index no. 69)*

The monument comprises a Class 1 Pictish symbol stone bearing an incised fish and a Pictish beast on its SW face and an associated enclosure. The monument is situated on a S-facing slope just below the crest of a hill in a field which overlooks the valley of the river Bogie to the E and the site of St Luag's church to the NE. We note that a wireframe is being produced. We would suggest that this also includes a photomontage.

Additionally, we understand that ZTV analysis has been used to identify further heritage assets for assessment included within Table 2-2 of the Revised Scoping Report. We note that this list does not include all of the heritage assets we had previously identified for assessment, with the *Gallows Hill Cairn, 460m SSE of Lesmoir (Scheduled Monument, Index No. 11576)* not considered here. We would therefore recommend that impacts on this heritage asset are considered as set out below, and that a large scale ZTV is provided with heritage assets clearly marked on it.

- *Gallows Hill Cairn, 460m SSE of Lesmoir (Scheduled Monument, Index No. 11576)*

This monument comprises a probably Bronze Age earth and stone burial mound and extensive views are possible from it. We would welcome confirmation of whether the monument falls within or outwith the ZTV. Should there be visibility from the monument, a wireframe and photomontage should be produced.

We would also recommend that further consideration is given to those heritage assets excluded from assessment following ZTV analysis. In particular, consideration should be given as to whether any of these heritage assets are likely to be caught in views of



the turbines from a third point. This is especially the case for nearby assets such as the Category A listed *Beldorney Castle (LB9164)*.

In all cases, we would recommend that any EIA undertaken for the proposed development should be supported by appropriate visualisations such as photomontage and/or wireframe views. Visualisations should be provided where impacts are likely to be highest. We suggest that any cumulative impacts resulting from this development in combination with other existing and proposed wind farm developments within the surrounding area should also be carefully considered. This should also be examined through the use of cumulative visualisations.

Further information

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at <http://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Alison Baisden and they can be contacted by phone on 0131 668 8575 or by email on Alison.Baisden@hes.scot.

Yours faithfully,

Historic Environment Scotland



<William.Kidd@scotland.gsi.gov.uk>

21/07/2009 09:18

To: <Alex.Kerr@scotland.gsi.gov.uk>
cc: <aude.chaiban@aberdeenshire.gov.uk>
Subject: Your EIA/ABS/024 dated 11 June - Clashindarroch Windfarm

Alex,

Please find attached Historic Scotland's response to the above consultation, hard copy in the post today.

Regards

Billy Kidd
Development Assessment Administrator
Historic Scotland
Room E3
Longmore House
Salisbury Place
Edinburgh
EH9 1SH
Telephone: 0131 668 8898

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HISTORIC SCOTLAND



Aude Chaiban
Planning Officer
Aberdeenshire Council
Viewmount
Arduthie Road
Stonehaven
AB39 2DQ

Development Assessment Team
Room E3
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Direct Line: 0131 668 8898
Direct Fax: 0131 668 8765
Switchboard: 0131 668 8600
HS.DAT@scotland.gsi.gov.uk

Our ref: AMN/16/GB
Your ref: M/APP/2009/1380/MAJ
dated 08 June 2009

21 July 2009

Dear Ms Chaiban

Environmental Impact Assessment (Scotland) Regulations 1999
Full Planning Permission for wind farm comprising 18 turbines and associated infrastructure (hardstanding 30.5km site roads, substation compound, switch room, underground cables, welfare facility and wind monitoring mast on whole site), Clashindarroch Forest, Huntly, Aberdeenshire

I refer to your letter of 8 June 2009 and the accompanying Environmental Statement (ES). We have reviewed the content of the ES for our role as a consultee through the Scottish Ministers under the terms of the Environmental Impact Assessment (Scotland) Regulations 1999. This letter provides our comments on the adequacy of the assessment of the likely impact of the development on those sites within our statutory historic environment remit as it is set out in the ES. That is scheduled monuments and their setting, category A listed buildings and gardens and designed landscapes included in the Inventory. I advise that you seek information and advice on regionally and locally important sites from your Council's archaeological and conservation advisors if you have not already done so.

I understand that this is a revised proposal for a wind farm on this site, consisting of 18 turbines with a maximum height of 110 metres and ancillary development. The ES has identified that there are a number of sites in the vicinity of the proposed wind farm, which are assessed in chapter 10. Although I have a minor concern about the consistency of the terminology used in the assessment with that set out in section 10.2.2.6 and table 10.6 in

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particular, I can confirm that we are broadly content with its conclusions. That is whilst the proposed development will have an impact on a number of nationally important monuments, that impact is not likely to be of unacceptably high significance.

If you wish to discuss any of the issues raised in this letter, please contact Adele Shaw at this address on 0131 668 8758 or adele.shaw@scotland.gsi.gov.uk.

Yours sincerely

William Kidd
Development Assessment Administrator

Copy to: Alex Kerr, SG – DD, Planning

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

T: +44 (0)28 9073 2493

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CAMBRIDGE

T: + 44 (0)1223 813805

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: + 44 (0)1392 490152

GLASGOW

T: +44 (0)141 353 5037

GUILDFORD

T: +44 (0)1483 889800

LEEDS

T: +44 (0)113 258 0650

LONDON

T: +44 (0)203 691 5810

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 2455153

SHREWSBURY

T: +44 (0)1743 23 9250

STAFFORD

T: +44 (0)1785 241755

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: + 353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)4 76 70 93 41