

## 10. Cultural Heritage

### Non-Technical Summary

#### Methodology

- 10.1 This Chapter assesses potential effects upon the Historic Environment (Archaeology and Cultural Heritage) as a result of the Proposed Development. Assessment of potential direct (physical) effects and effects upon cultural significance through development within the setting of heritage assets is presented separately for the construction, operation and decommissioning stages of the Proposed Development, and potential cumulative effects are presented separately also.
- 10.2 The assessment has been compiled with reference to all relevant planning policy and guidance documents of Historic Environment Scotland (HES) and the Chartered Institute for Archaeologists (CIfA). Through Scoping, Headland Archaeology (UK) Ltd, part of the RSK Group, consulted with statutory consultees to agree the methodology employed by the assessment and for them to identify specific assets of particular concern. The methodology and Study Areas employed by the assessment have been formulated as a result of this consultation.
- 10.3 Within the Inner Study Area (used throughout this assessment to refer to the site boundary), all heritage assets are assessed for potential construction and operational effects. The Outer Study Area (OSA) is defined by the zone of theoretical visibility (ZTV) to identify any heritage assets that may be affected by the operation of the Proposed Development, i.e. through effects on their settings and the contribution made to their cultural significance. The baseline for the assessment has been informed by a comprehensive desk-based study (Volume 4, **Appendix 10.A**), based on all readily available documentary sources. The desk-based study also includes a Glossary of Terms used in this Chapter.

#### Baseline conditions

- 10.4 There are no designated assets within the ISA. There are a total of eight non-designated heritage assets within the ISA. Of these, one is recorded on THC HER: farmstead MHG26505, which was fully excavated and recorded within the current ISA during construction of the access track for Tom nan Clach Wind Farm (the 'Operational Scheme'). The remaining non-designated heritage assets were identified during previous walkover surveys within the current ISA.
- 10.5 The majority of the heritage assets within the ISA comprise post-medieval and later historic period features representing upland farming. They include a farmstead (site of) and associated enclosure and the remains of five shieling huts. These heritage assets are all non-designated and represent locally common features relating to upland farming. They are of low (local) importance.
- 10.6 Within 2km from proposed turbines there are five non-designated heritage assets comprising a township, a shieling, two farmsteads and an air crash site. Within 2-5 km from the proposed turbines there are three scheduled monuments. Within 5-10 km from the proposed turbines there are 11 scheduled monuments, three Category A Listed Buildings, and 17 Category B Listed

Buildings. Within 10–20 km from the proposed turbines there are seven Inventory Gardens and Designed Landscapes, and 38 Category A Listed Buildings (15 of which are located within an IGD boundary).

10.7 Stage 1 Setting Assessment considers each heritage asset in the OSA in turn to identify those assets in the ZTV which have a wider landscape setting that contributes to their cultural significance and whether it is likely that cultural significance could be harmed by the Proposed Development. In accordance with the HES Scoping Opinion, The Stage 1 Setting Assessment also concluded that the Proposed Development has the potential to cause effects on the cultural significance of one Scheduled Monument through change to its setting:

- SM1231 Lochindorb Castle. Located 9.8km east of the ISA, the castle comprises the substantial remains of a 13th century island castle. As a Scheduled Monument, the castle is of High importance.

Potential impacts

10.8 No direct effects upon any known archaeological remains have been identified. It is recommended that certain heritage assets are fenced off with a suitable buffer throughout construction to prevent accidental damage.

10.9 Any effect resulting from an impact upon archaeological remains discovered during the construction phase is unlikely to be of greater than **Minor significance**. Following implementation of a programme of mitigation agreed with the Highland Council ('THC') in advance of the works, if required, no residual effects are anticipated upon any currently unknown potential heritage assets that may be preserved within the site.

10.10 Construction phase setting effects would be temporary and are not considered to be significant in EIA due to their very short duration.

10.11 A residual effect of **Minor significance**, which is **not significant** in EIA terms, is predicted on Lochindorb Castle SM1231 throughout the operation of the Proposed Development.

10.12 Cumulative impact assessment, considering all other operational, consented and submitted applications for wind farms in the vicinity has identified no significant effects in EIA terms as a result of the Proposed Development.

10.13 No direct residual decommissioning effects have been identified. Although impacts have been assessed as if the development was permanent (SPP paragraph 170), on decommissioning the operational effects on Lochindorb Castle SM1231 would be reversed.

## Introduction

- 10.14 The existing Tom nan Clach Wind Farm, a 13-turbine scheme together with associated infrastructure hereafter referred to as the Operational Scheme, was consented on 28th October 2016 by THC (Planning Appeal Ref: PPA-270-2150). The proposed Tom na Clach Wind Farm Extension (hereafter, the Proposed Development) comprises seven new 149.9m (to blade tip) wind turbines and associated infrastructure to the east of the Operational Scheme. This chapter presents an assessment of the effects of the Proposed Development on the Historic Environment (Archaeology and Cultural Heritage). The assessment was undertaken by Headland Archaeology (UK) Ltd.
- 10.15 A heritage asset (or historic asset) is any element of the historic environment which has cultural significance. Both discrete features, and extensive landscapes defined by a specific historic event, process or theme, can be defined as heritage assets; and assets may overlap or be nested within one another. Designated assets include Scheduled Monuments, Listed Buildings, World Heritage Sites, Conservation Areas, Inventory Gardens and Designed Landscapes, Inventory Historic Battlefields and Historic Marine Protected Areas. Other assets may also be locally designated through policies in the Local Plan.
- 10.16 The majority of heritage assets are not designated. Some undesignated assets are recorded in Historic Environment Records or Sites and Monuments Records (HERs/SMRs) maintained by local authorities and other agencies. However, many heritage assets are currently unrecorded, and the information contained in HERs and SMRs is not definitive, since they may include features which, for instance, have been entirely removed, or are of uncertain location, dubious identification, or negligible importance. The identification of undesignated heritage assets is therefore to some extent a matter of professional judgement.
- 10.17 Some heritage assets may coincide with visual receptors or landscape character areas, which are assessed in Chapter 9 (Landscape and Visual Impact Assessment) and in such cases, it is important to recognise the difference in approach between these two topics. Cultural heritage assessment addresses effects on the cultural heritage significance of heritage assets, which may result from, but are not equivalent to, visual impacts. Similarly, an effect on a landscape character area does not equate to an effect on the cultural heritage significance of heritage assets within it.

## Objectives

- 10.18 The objectives of this assessment are to:
- Describe the location, nature and extent of any known heritage assets or areas of archaeological potential which may be affected by the Proposed Development;
  - Provide an assessment of the importance of these assets;
  - Assess the likely scale of any effects on the historic environment posed by the Proposed Development;
  - Outline suitable mitigation measures to avoid, reduce or offset significant adverse effects; and

- Provide an assessment of any residual effects remaining after mitigation.

**Standards and acknowledgements**

- 10.19 Headland Archaeology (UK) is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA), an audited status which confirms that all work is carried out in accordance with the highest standards of the profession.
- 10.20 Headland Archaeology (UK), as part of the RSK Group, is recognised by the Institute of Historic Building Conservation (IHBC) under their ‘Historic Environment Service Provider Recognition’ scheme. This quality assurance standard acknowledges that RSK works to the conservation standards of the IHBC, the UK’s lead body for built and historic environment practitioners and specialists.
- 10.21 Headland Archaeology (UK) operates a quality management system to help ensure all projects are managed in a professional and transparent manner, which enables it to qualify for ISO 9001.

**Legislation and Policy context**

- 10.22 The assessment has been undertaken with reference to relevant legislation, policy and guidance relating to the historic environment.

Statutory protection

- 10.23 Scheduled Monuments and Listed Buildings are protected by statute.
- 10.24 Legislation regarding Scheduled Monuments is contained within The Ancient Monuments and Archaeological Areas Act 1979. Legislation regarding Listed Buildings is contained in The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.
- 10.25 The 1979 Act makes no reference to the settings of Scheduled Monuments. The 1997 Act does, however, place a duty on the planning authority with respect to Listed Buildings and Conservation Areas, and their settings. Section 59 of the 1997 Act states (in part):

*“In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

- 10.26 The Historic Environment Scotland Act 2014 defines the role of the public body, Historic Environment Scotland (HES), and the processes for the designation of heritage assets, consents and rights of appeal.

National planning framework

- 10.27 The National Planning Framework 3 (NPF3) describes how the future spatial development of Scotland can contribute to planning outcomes. It shows where there will be opportunities for growth and regeneration, investment in the low carbon economy, environmental enhancement, and improved connections across the country.

- 10.28 Historic Environment Policy for Scotland (HEPS) (HES 2019b) defines the Historic Environment and Scottish Government Policy. It sets out the vision and key principles on how to care for and protect Scotland’s historic environment including designations of ancient monuments, principles for scheduling and listing, contexts for conservation areas, marine protected areas, gardens and designated landscapes, historic battlefields and consents and advice.
- 10.29 The Scottish Government’s planning policies in relation to the historic environment are set out in paragraphs 135-151 of Scottish Planning Policy (SPP) (The Scottish Government, June 2014). The historic environment is defined as “*the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand*” and includes “*individual assets, related settings and the wider cultural landscape*”.
- 10.30 The policy principles are stated in paragraph 137:  
“*The planning system should:*  
  
*promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning; and*  
  
*enable positive change in the historic environment which is informed by a clear understanding of the importance of the heritage assets affected and ensure their future use. Change should be sensitively managed to avoid or minimise adverse impacts on the fabric and setting of the asset, and ensure that its special characteristics are protected, conserved or enhanced.*”
- 10.31 The SPP applies these principles to all designated assets (paragraphs 141-149). In particular, it states that:  
  
Regarding developments affecting Listed Buildings, “*special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest*”;  
  
Proposals “*which will impact on its appearance, character or setting [of a Conservation Area], should preserve or enhance the character and appearance of the conservation area*”;  
  
“*Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances*”;  
  
“*Where a development proposal has the potential to affect a World Heritage Site, or its setting, the planning authority must protect and preserve its Outstanding Universal Value*”;  
  
“*Planning authorities should protect and, where appropriate, seek to enhance gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes and designed landscapes of regional and local importance*”; and  
  
“*Planning authorities should seek to protect, conserve and, where appropriate, enhance the key landscape characteristics and special qualities of sites in the Inventory of Historic Battlefields*”.

10.32 The SPP also requires planning authorities to protect archaeological sites and monuments, preserving them in situ where possible, or otherwise ensure *"appropriate excavation, recording, analysis, publication and archiving before and/or during development"* (paragraph 150). *"Non-designated historic assets and areas of historical interest, including historic landscapes, other gardens and designed landscapes, woodlands and routes such as drove roads"* should also be preserved in situ wherever feasible (paragraph 151).

10.33 'Our Place in Time: the Historic Environment Strategy for Scotland' (2015) presents the Scottish Government's strategy for the protection and promotion of the historic environment. The Historic Environment Policy for Scotland (HEPS, 2019) and the Historic Environment Scotland Circular (2019) complement the SPP and provide further policy direction. In particular, HEPS provides more detailed policy on historic environment designations and consents.

#### Local Planning Policy

10.34 Policy 57 Natural, Built and Cultural Heritage of the Highland-wide Local Development Plan (HwLDP, adopted in April 2012) relates to the Council's approach to archaeological and historical features of local, regional, national and international importance.

10.35 The Policy details the tests against which all development affecting cultural and built heritage must be assessed. Policy 57 is informed by the Council's own 'Supplementary Guidance: Highland Historic Environment Strategy' (to be adopted) and by Historic Environment Scotland's guidance on 'Managing Change in the Historic Environment'.

#### Guidance

10.29 Planning Advice Note 2/2011: Planning and Archaeology provides technical advice to planning authorities and developers on dealing with archaeological remains. Among other issues it covers the balance in planning decisions between the preservation of archaeological remains and the benefits of development; the circumstances under which developers can be required to provide further information, in the form of a field evaluation, to allow planning authorities to reach a decision; and measures that can be taken to mitigate adverse impacts.

10.30 HES published Designation Policy and Selection Guidance (DPSG, 2019) to accompany HEPS. DPSG outlines the policy and selection guidance used by HES when designating sites and places of national importance.

10.31 HES provides guidance on how to apply the policies set out in the SPP in a series of documents entitled 'Managing Change in the Historic Environment', of which the guidance note on 'Setting' (Historic Environment Scotland, 2016 updated 2020) is relevant.

10.32 Standards and Guidance published by the Chartered Institute for Archaeologists (CIfA) have been followed in preparing this assessment, in particular the 'Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment' (2014) and the 'Standard and guidance for historic environment desk-based assessment' (2014).

10.33 This assessment has also been prepared with reference to IEMA, IHBC and CIfA's July 2021 publication Principles of Cultural Heritage Impact Assessment in the

UK. This document presents the principles of and suggests good practice for assessment of the impact of a development proposal on cultural heritage assets.

10.34 THC Historic Environment Team has also produced a guidance document which sets out practical guidelines for a consistent approach to the management of the historic environment within the planning process:

- Highland Council Standards for Archaeological Work (post-consultation draft, February 2012).

**Consultation**

10.35 Responses arising from scoping and other consultation carried out during the archaeology and cultural heritage assessment are summarised in Table 10.1

**Table 10-1 Summary of consultations**

<b>Consultee</b>	<b>Response</b>	<b>Action</b>
Historic Environment Scotland (HES) Scoping Opinion 300044438, 27/04/2021	Potential for cumulative setting effects arising from the Proposed Development, the Operational Scheme and the proposed Lethen Wind Farm on Lochindorb Castle, a Scheduled Monument located 11km to the east.	Detailed setting assessment has been carried out in order to assess the significance of any effects the Proposed Development may have on the setting of Lochindorb Castle in this chapter.
The Highland Council Historic Environment Team Scoping Opinion 21/01829/SCOP, 14/05/2021	None – The Highland Council were satisfied with the methodology presented for assessing the baseline conditions of the Proposed Development.	This chapter is presented in accordance with the commitments of the Proposed Development Scoping Report

**Methodology**

10.36 Assessment of potential direct (physical) effects and effects upon cultural significance through development within the setting of heritage assets is presented separately for the construction, operation and decommissioning stages of the Proposed Development, and potential cumulative effects are presented separately also.

10.37 The cultural heritage assessment has been carried out in the following stages:

- Desk-based study leading to the identification of heritage assets potentially affected by the development;
- Definition of baseline conditions, based on results of the desk-based study and visits to heritage assets;
- Assessment of the importance of heritage assets potentially affected by the development;



- Identification of potential impacts on heritage assets, informed by baseline information, site visits, Zone of Theoretical Visibility (ZTV) mapping, wireframes and photomontages;
- Proposal of mitigation measures, to eliminate, reduce or offset adverse effects;
- Assessment of the magnitude of residual effects;
- Assessment of the significance of residual effects, broadly a product of the asset's importance and the magnitude of the impact; and
- Assessment of cumulative effects.

### Study areas

- 10.38 The Inner Study Area (ISA) corresponds to the site boundary. Within this area, all heritage assets are assessed for construction and operational effects.
- 10.39 The Outer Study Area (OSA) extends to 20km from the proposed turbines, which is taken as the maximum extent of potentially significant effects on the settings of heritage assets. Within the OSA, assets have been included in the assessment based on the level of importance assigned to the asset (see Table 10.3), to ensure that all potential significant effects are recognised:
- Up to 2km from Proposed Development: Category C Listed Buildings, and any non-designated heritage asset;
  - Up to 10 km from proposed turbines: Scheduled Monuments, Category A and B Listed Buildings, Conservation Areas, Inventory Gardens and Designed Landscapes and Inventory Battlefields;
  - Up to 20 km from proposed turbines: any asset which is considered exceptionally important, and where long-distance views from or towards the asset are thought to contribute to cultural significance, in the opinion of the assessor or consultees.
- 10.40 Criteria for the identification of assets of particular sensitivity or importance was based on the approach set out in Managing Change in the Historic Environment: Setting (Historic Environment Scotland, 2016 updated 2020) that sets out a range of factors which might form part of the setting of a heritage asset as follows:
- *"Current landscape or townscape context;*
  - *Views to, from and across or beyond the historic asset or place;*
  - *Key vistas: for instance, a 'frame' of trees, buildings or natural features that give the historic asset or place a context, whether intentional or not);*
  - *The prominence of the historic asset or place in views throughout the surrounding area, bearing in mind that sites need not be visually prominent to have a setting;*
  - *Aesthetic qualities;*
  - *Character of the surrounding landscape;*
  - *General and specific views including foregrounds and backdrops;*



- *Views from within an asset outwards over key elements in the surrounding landscape, such as the view from the principal room of a house, or from a roof terrace;*
- *Relationships with other features, both built and natural;*
- *Non-visual factors such as historical, artistic, literary, place name, or scenic associations, intellectual relationships (e.g. to a theory, plan, or design), or sensory factors; and*
- *A 'sense of place': the overall experience of an asset which may combine some of the above factors."*

#### Data sources

10.41 The baseline for the assessment has been informed by a comprehensive Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 4, **Appendix 10.A**), based on all readily available documentary sources, following the Chartered Institute for Archaeologists' (CIfA) 'Standard and Guidance for historic environment desk-based assessment'. The following sources of information were referred to:

- Designation data downloaded from the Historic Environment Scotland website in October 2021;
- The National Record of the Historic Environment (NRHE), including the Canmore database and associated photographs, prints/drawings and manuscripts held by HES;
- Historic Environment Record (HER) data, digital extract received from THC HER, January 2021;
- Historic Landscape Assessment data, viewed through the HLAMap website;
- The National Collection of Aerial Photography (NCAP);
- Geological data available online from the British Geological Survey;
- Previous survey reports;
- Historic maps held by the National Library of Scotland;
- Unpublished maps and plans held by the National Records of Scotland;
- Relevant internet resources, including Google Maps, Google Earth, Bing satellite imagery and PastMap;
- Readily available published sources and unpublished archaeological reports.

10.42 With the agreement of consultees through scoping, no site visit was made for the preparation of this report. The ISA for the Proposed Development was included within the original EIA walkover surveys and subsequent field assessments undertaken at the site for the Operational Scheme.

#### **Definition of baseline conditions**

10.43 Designated heritage assets are labelled with the reference number assigned to them by HES (prefixed SM for Scheduled Monuments, and LB for Listed

Buildings); non-designated assets are labelled with the reference number in the THC HER (prefixed MHG) or the NRHE. Previously unrecorded heritage assets within the ISA have been assigned a number (prefixed HA for Heritage Asset). A single asset number can refer to a group of related features, which may be recorded separately in the HER and other data sources. Assets within the ISA are shown in Volume 3, **Figure 10.1**, with detailed descriptions compiled in a Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 4, **Appendix 10.A**). All heritage assets within the OSA are shown in Volume 3, **Figure 10.2**.

Potential for unknown heritage assets within the ISA

10.44 The likelihood that undiscovered heritage assets may be present within the ISA is referred to as archaeological potential. Overall levels of potential can be assigned to different landscape zones, following the criteria in Table 10.2, while recognising that the archaeological potential of any zone will relate to particular historical periods and types of evidence. The following factors are considered in assessing archaeological potential:

- The distribution and character of known archaeological remains in the vicinity, based principally on an appraisal of data in the HER;
- The history of archaeological fieldwork and research in the surrounding area, which may give an indication of the reliability and completeness of existing records;
- Environmental factors such as geology, topography and soil quality, which would have influenced land-use in the past and can therefore be used to predict the distribution of archaeological remains;
- Land-use factors affecting the survival of archaeological remains, such as ploughing or commercial forestry planting; and
- Factors affecting the visibility of archaeological remains, which may relate to both environment and land-use, such as soils and geology (which may be more or less conducive to formation of cropmarks), arable cultivation (which has potential to show cropmarks and create surface artefact scatters), vegetation, which can conceal upstanding features, and superficial deposits such as peat and alluvium which can mask archaeological features.

**Table 10-2 Archaeological potential**

Potential	Definition
High	Undiscovered heritage assets of high or medium importance are likely to be present.
Medium	Undiscovered heritage assets of low importance are likely to be present; and it is possible, though unlikely, that assets of high or medium importance may also be present.
Low	The study area may contain undiscovered heritage assets, but these are unlikely to be numerous and are highly unlikely to include assets of high or medium importance.
Negligible	The study area is highly unlikely to contain undiscovered heritage assets of any level of importance.

Nil	There is no possibility of undiscovered heritage assets existing within the study area.
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**Identification of potential effects**

- 10.45 Effects on the historic environment can arise through direct physical impacts, impacts on setting or indirect impacts:
- Direct physical impacts describe those development activities that directly cause damage to the fabric of a heritage asset. Typically, these activities are related to construction works and will only occur within the ISA.
  - An impact on the setting of a heritage asset occurs when the presence of a development changes the surroundings of a heritage asset in such a way that it affects (beneficially or adversely) the cultural significance of that asset. Visual impacts are most commonly encountered but other environmental factors such as noise, light or air quality can be relevant in some cases. Impacts may be encountered at all stages in the life cycle of a development from construction to decommissioning but they are only likely to lead to significant effects during the prolonged operational stage of the development.
  - Indirect impacts describe secondary processes, triggered by the development, that lead to the degradation or preservation of heritage assets. For example, changes to hydrology may affect archaeological preservation; or changes to the setting of a building may affect the viability of its current use and thus lead to dereliction.
- 10.46 Likely significant direct or indirect effects on known and unknown heritage assets are discussed in terms of the risk that a significant effect could occur. The level of risk depends on the level of archaeological potential combined with the nature and scale of disturbance associated with construction activities and may vary between high and negligible for different elements or activities associated with a development, or for the development as a whole.
- 10.47 Likely significant effects on the settings of heritage assets are identified from an initial desk-based appraisal of data from HES and the HER, and consideration of current maps and aerial images. Photomontage and wireline visualisations have been prepared to illustrate changes to key views, and to aid assessment where potential setting effects have been identified (Volume 3). The visualisations have been produced by the Landscape and Visual team, the methodology for preparing the photomontage is described in Chapter 9: LVIA.
- 10.48 For any identified effect the preferred mitigation option is always to avoid or reduce effects through design, or through precautionary measures such as fencing off heritage assets during construction works to avoid accidental direct effects. Effects which cannot be eliminated in these ways will lead to residual effects.
- 10.49 Adverse direct or indirect physical effects may be mitigated by an appropriate level of survey, excavation, recording, analysis and publication of the results, in accordance with a written scheme of investigation (SPP paragraph 150 and PAN2/2011, sections 25-27).

**Impact assessment criteria**

Heritage importance and cultural significance

- 10.50 Cultural heritage impact assessment is concerned with effects on cultural significance, which is a quality that applies to all heritage assets, and as defined by Historic Environment Scotland (Environmental Impact Assessment Handbook, NatureScot & HES 2018, v5 Appendix 1 page 175), relates to the ways in which a heritage asset is valued both by specialists and the public. The cultural significance of a heritage asset will derive from factors including the asset’s fabric, setting, context and associations. This use of the word ‘significance’, referring to the range of values attached to an asset, should not be confused with the unrelated usage in EIA where the significance of an effect reflects the weight that should be attached to it in a planning decision.
- 10.51 The importance of a heritage asset is the overall value assigned to it based on its cultural significance, reflecting its statutory designation or, in the case of non-designated assets, the professional judgement of the assessor (Table 10.3). Heritage assets of national importance and international importance are assigned a high and very high level respectively. Scheduled Monuments, Inventory Gardens and Designed Landscapes, Inventory Historic Battlefields and Historic Marine Protected Areas are, by definition, of national importance.
- 10.52 The criterion for Listing is that a building is of ‘special architectural or historic interest’; following DPSG Annex 2.19, Category A refers to ‘outstanding examples of a particular period, style or building type’, Category B to ‘major examples of a particular period, style or building type’, and Category C to ‘representative examples of a particular period, style or building type’.
- 10.53 Any feature which does not merit consideration in planning decisions due to its cultural significance may be said to have negligible heritage importance; in general, such features are not considered as heritage assets and are excluded from the assessment (see accompanying Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 4, **Appendix 10.A**).

**Table 10-3 Criteria for assessing the importance of heritage assets**

<b>Importance</b>	<b>Criteria</b>
Very High (International)	World Heritage Sites and other assets of equal international importance, that contribute to international research objectives
High (National)	Inventory Gardens and Designed Landscapes, Scheduled Monuments, Protected Wreck Sites, Inventory Historic Battlefields, Category A and B Listed Buildings, Historic Marine Protected Areas, and non-designated heritage assets of equivalent importance that contribute to national research objectives
Medium (Regional)	Conservation Areas, Category C Listed Buildings, undesignated assets of regional importance except where their particular characteristics merit a higher level of importance, heritage assets on local lists and non-designated assets that contribute to regional research objectives
Low (Local)	Locally listed heritage assets, except where their particular characteristics merit a higher level of importance, undesignated heritage assets of Local importance, including assets that may already be partially damaged

Negligible	Identified historic remains of no importance in planning considerations, or heritage assets and findspots that have already been removed or destroyed (i.e. 'site of')
Unknown/ Uncertain	Heritage assets for which a level of importance cannot be defined based on current information

10.54 Cultural significance is assessed in relation to the criteria in DPSG Annexes 1-6, which are intended primarily to inform decisions regarding heritage designations but may also be applied more generally in identifying the 'special characteristics' of a heritage asset, which contribute to its significance and should be protected, conserved and enhanced according to SPP paragraph 137. Annex 1 is widely applicable in assessing the cultural significance of archaeological sites and monuments, for instance, while the criteria in Annex 2 can be used in defining the architectural or historic interest of buildings, whether listed or not.

10.55 The special characteristics which contribute to an asset's cultural significance may include elements of its setting. Setting is defined in 'Managing Change in the Historic Environment: Setting' (HES 2016 updated 2020, Section 1) as 'the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced'. The setting of a heritage asset is defined and analysed according to Stage 2 of the three-stage approach promoted in 'MCHES: Setting', with reference to factors listed on pages 9-10 (see Assessment of the magnitude of impacts on cultural significance, below). The relevance of these factors to the understanding, appreciation and experience of the asset determines how, and to what extent, an asset's cultural significance derives from its setting. All heritage assets have settings; however, not all assets are equally sensitive to effects on their settings. In some cases, setting may contribute very little to the asset's significance, or only certain elements of the setting may be relevant.

Assessment of the magnitude of effects on cultural significance

10.56 The magnitude of an effect is a measure of the degree to which the cultural significance of a heritage asset will potentially change as a result of the Proposed Development (NatureScot & HES 2018, Environmental Impact Assessment Handbook, v5 Appendix 1, para 42). This definition of magnitude applies to likely effects on the setting as well as likely physical effects on the fabric of an asset.

10.57 The methodology adopted for the identification and assessment of potential effects on setting follows the approach set out in Managing Change in the Historic Environment: Setting (Historic Environment Scotland, 2016 updated 2020) and the Environmental Impact Assessment Handbook (NatureScot & HES, 2018, v5 Appendix 1). The guidance sets out three stages in assessing the effect of development on the setting of a heritage asset or place as follows:

- Stage 1: Identify the historic assets that might be affected by a development;
- Stage 2: define and analysis the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced; and
- Stage 3: evaluate potential effect of the proposed changes on the setting, and the extent to which any negative effects can be mitigated.

- 10.58 It is important to note that the magnitude of an effect resulting from an effect on setting is not a direct measure of the visual prominence, scale, proximity or other attributes of the Proposed Development itself, or of the extent to which the setting itself is changed. Moreover, it is necessary to consider whether, and to what extent, the characteristics of the setting which would be changed contribute to the asset’s cultural significance (NatureScot & HES 2018, Environmental Impact Assessment Handbook, v5 Appendix 1, paras 42 and 43).
- 10.59 Magnitude is assessed as high/medium/low/negligible, and adverse or beneficial, or no effect, using the criteria in Table 10.4 as a guide. In assessing the likely effects of a development, it is often necessary to take into account various effects which affect an asset’s cultural significance in different ways, and balance adverse effects against beneficial effects. For instance, there may be adverse effects on an asset’s fabric and beneficial effects on cultural significance resulting from change in setting arising from a development which would not otherwise occur in a ‘do-nothing’ scenario; a heritage asset that might otherwise degrade over time could be preserved or consolidated as a consequence of a development. The residual effect is an overall measure of how the asset’s significance is reduced or enhanced.

**Table 10-4 Criteria for assessing the magnitude of impacts on heritage assets**

<b>Magnitude</b>	<b>Description</b>
High Beneficial	Alterations to an asset and/or its setting resulting in considerable enhancement of cultural significance. Or Preservation of an asset and/or its setting where it would otherwise suffer considerable loss of cultural significance in the do-nothing scenario.
Medium Beneficial	Alterations to an asset and/or its setting resulting in moderate enhancement of cultural significance. Or Preservation of an asset and/or its setting where it would otherwise suffer moderate loss of cultural significance in the do-nothing scenario.
Low Beneficial	Alterations to an asset and/or its setting resulting in a slight enhancement of cultural significance. Or Preservation of an asset and/or its setting where it would otherwise suffer slight loss of cultural significance in the do-nothing scenario.
Negligible Beneficial	Alterations to an asset and/or its setting resulting in a very slight enhancement of cultural significance. Or Preservation of an asset and/or its setting where it would otherwise suffer very slight loss of cultural significance in the do-nothing scenario.
No Effect	The asset’s cultural significance is not altered.
Negligible Adverse	Alterations to an asset and/or its setting resulting in a very slight loss of cultural significance.
Low Adverse	Alterations to an asset and/or its setting resulting in a slight loss of cultural significance.
Medium Adverse	Alterations to an asset and/or its setting resulting in a moderate loss of cultural significance.
High Adverse	Alterations to an asset and/or its setting resulting in a considerable loss of cultural significance.

Assessment of the significance of effects

10.60 The significance of an effect ('EIA significance') on the cultural significance of a heritage asset, resulting from a direct or indirect physical effect or an effect on its setting is assessed by combining the magnitude of the impact and the importance of the heritage asset. The matrix in Table 10.5 provides a guide to decision-making but is not a substitute for professional judgement and interpretation, particularly where the asset importance or effect magnitude levels are not clear or are borderline between categories. EIA significance may be described on a continuous scale from none to major.

**Table 10-5 Criteria for assessing the significance of effects on heritage assets**

		Magnitude of change			
Importance	Very High	High Major	Medium Major	Low Major or Moderate	Negligible Moderate or Minor
	High	Major	Major or Moderate	Moderate or Minor	Minor
	Medium	Major or Moderate	Moderate or Minor	Minor	Negligible
	Low	Moderate or Minor	Minor	Negligible	Negligible

10.61 It is common practice to identify EIA effects as significant or not significant, and in this assessment **Major** and **Moderate** effects are regarded as 'significant' in EIA terms, while Minor and Negligible effects are 'not significant'.

10.62 Impact assessment conclusions upon scheduled monuments are also presented in the terms of SPP paragraph 145 i.e. "*Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting*". SPP does not define 'integrity' in the context of paragraph 145, therefore for the purposes of the assessment, the integrity of a setting is considered to be maintained if the principal characteristics of the setting that contribute to the cultural significance of the asset are retained, and it continues to be possible to appreciate and understand the Scheduled Monument in its setting.

Assessment of cumulative effects

10.63 Proposed wind energy developments are included in the cumulative assessment where they also feature prominently within views of or towards assets affected by the Proposed Development, as demonstrated by photomontage visualisations. A cumulative effect is considered to occur where the magnitude of the combined effect of two or more developments is greater than that of the developments considered separately.

10.64 Cumulative effects are considered in cases where an effect of more than negligible significance would occur as a result of the Proposed Development.



## **Baseline conditions**

### Assumptions and limitations

- 10.65 Information held by public data sources is generally considered to be reliable; however, the following general points are noted:
- Documentary sources are rare before the medieval period;
  - Whilst it is accepted that historic documents may be biased depending on the author, with content seen through the lens of context, wherever such documentary sources are used in assessing archaeological potential professional judgment is used in their interpretation in that the functionality of the document is considered;
  - HER records can be limited because opportunities for research, fieldwork and discovery depend on the situation of commercial development and occasional research projects, rather than the result of a more structured research framework. A lack of data within the HER records does not necessarily equal an absence of archaeology;
  - Where archaeological sites have been identified solely from aerial imagery without confirmation from archaeological excavation or supporting evidence in the form of find-spots for example, it is possible the interpretation may be revised in the light of further investigation.
  - The significance of sites can be difficult to identify from HER records, depending on the accuracy and reliability of the original source;
  - There can often be a lack of dating evidence for archaeological sites; and
  - Any archaeological site visit has inherent limitations, primarily because archaeological remains below ground level may have no surface indicators.

### Geology and geomorphology

- 10.66 The ISA occupies an undulating upland location with British Geological Survey (BGS) mapping indicating that a part of the north-western area is underlain by peat with the remainder dominated by either glacial till or shallow rock.
- 10.67 Consistent with the BGS mapping, peat investigations comprising 100m centre spaced probing was undertaken as part of the initial EIA survey works in October 2013 for the existing wind farm. During the survey works a total of 368 probes were implemented. The probing was undertaken in accessible areas, within forestry rides and along existing access tracks.
- 10.68 Peat deposits varied across the ISA however, typically shallow peat was recorded within steep topography. Peat deposits were recorded up to 3.0m thick within flatter areas, mainly in the north-western part of the ISA and localised pockets of peat were also recorded across the south of the ISA.
- 10.69 Archaeologically, accumulations of peat the have potential to contain significant palaeoenvironmental deposits such as pollen and macrofossil evidence as well as preserved organic material that would have, otherwise, decayed within aerobic conditions.

- 10.70 BGS mapping information on solid geology indicates that the ISA is underlain by Wacke of the Portpatrick Formation. Minor dykes were noted in the north of the ISA described as North Britain Siluro-Devonian Calc-Alkaline Dyke Suite comprising Microdiorite Porphyritic rocks.

**Overview of the historic environment**

- 10.71 The full list of known heritage assets within the Study Areas is presented in the gazetteer appended to accompanying Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 4, **Appendix 10.A**). The significance of these assets is discussed by period in the Assessment of Heritage Significance section.

Known heritage assets within the ISA

- 10.72 Assets within the ISA are shown in Volume 3, **Figure 10.1**.
- 10.73 There are no designated assets within the ISA.
- 10.74 There are a total of eight non-designated heritage assets within the ISA. Of these, one is recorded on THC HER: farmstead MHG26505, which was fully excavated and recorded within the current ISA during construction of the access track for the Operational Scheme.
- 10.75 The remaining seven non-designated heritage assets were identified during previous walkover surveys within the current ISA:

- HA1 D-shaped drystone enclosure;
- HA3 Shielling hut;
- HA4 Possible cairn;
- HA5 Shielling hut;
- HA6 Shielling hut;
- HA7 Shielling hut;
- HA8 Shielling hut.

- 10.76 The majority of the heritage assets within the ISA comprise post-medieval and later historic period features representing upland farming. They include a farmstead (site of) and associated enclosure and the remains of five shieling huts. These heritage assets are all non-designated and represent locally common features relating to upland farming. They are of low (local) importance.

- 10.77 Without the benefit of further investigation to elucidate the nature and date of the possible cairn (HA4), it is considered to be of low (local) importance and of unknown date.

Heritage Assets in the OSA

- 10.78 All heritage assets within the OSA are shown in Volume 3, **Figure 10.2**.
- 10.79 Within 2km from proposed turbines) there are five non-designated heritage assets comprising a township, a shieling, two farmsteads and an air crash site. These are discussed in more detail in the archaeological and historical narrative below and considered in the assessment of the ISA's archaeological potential.

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- 10.80 Within 2-5 km from the proposed turbines there are three scheduled monuments.
- 10.81 Within 5-10 km from the proposed turbines there are 11 scheduled monuments, three Category A Listed Buildings, and 17 Category B Listed Buildings.
- 10.82 Within 10–20 km from the proposed turbines there are seven Inventory Gardens and Designed Landscapes, and 38 Category A Listed Buildings (15 of which are located within an IGDL boundary).
- 10.83 No heritage assets have been identified within the ZTV beyond 20km for which setting contributes to cultural significance such that a significant effect is anticipated as a result of the Proposed Development.
- 10.84 A Stage 1 Setting Assessment has been carried out in order to consider whether further detailed assessment was required for heritage assets within the OSA, based on whether it is likely that their cultural significance could be harmed through development within their setting. Summary results are presented in Part 6.2 of the Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 4, **Appendix 10.A**).
- 10.85 The Stage 1 Setting Assessment methodology considers each heritage asset in the OSA in turn to identify those assets in the ZTV which have a wider landscape setting that contributes to their cultural significance and whether it is likely that cultural significance could be harmed by the Proposed Development. Where heritage assets are located outwith the ZTV, third-party viewpoints within the ZTV which may provide a significant view towards the heritage asset and the Proposed Development were considered.
- 10.86 In accordance with the HES Scoping Opinion, The Stage 1 Setting Assessment also concluded that the Proposed Development has the potential to cause effects on the cultural significance of one Scheduled Monument through change to its setting:
- SM1231 Lochindorb Castle. Located 9.8km east of the ISA, the castle comprises the substantial remains of a 13th century island castle. As a Scheduled Monument, the castle is of High importance.

### **Previous investigations**

- 10.87 A total of four previous investigations have taken place with the ISA. In 2009 an application for the 17-turbine scheme, Tom nan Clach Wind Farm, was submitted on the Operational Scheme site, with supporting archaeological surveys over a 12.3 km<sup>2</sup> area which included the survey area for the current Proposed Development (Infinergy, 2009).
- 10.88 The survey for the 17-turbine scheme took place in May – July 2007 and the survey for the access track took place in January – February 2009. As a result of the surveys carried out in 2007 and 2009, six heritage assets located within the ISA for the current assessment of the Proposed Development have been included in the impact assessment in this chapter.
- HA1, a D-shaped enclosure;
  - HA4, a possible cairn; and

- HA3, 5, 6 & 7, four shielings.
- 10.89 In 2015, a second application was submitted ('Tom nan Clach Repowering', which now forms the Operational Scheme), on the adjacent area to the west of the Proposed Development. The Environmental Statement ('ES') supporting the planning application (Infinergy, 2015) utilised the baseline data from the 2009 ES and previous 2007 HAS survey, which was revised with additional survey in 2014.
- 10.90 As a result of the surveys carried out in 2014, two additional possible heritage assets were identified within the ISA:
- HA8, a shieling; and
  - HA9, a modern walkers' cairn.
- 10.91 The 2009 assessment, and another assessment carried out by Headland Archaeology in 2015, identified that there would be direct archaeological impacts upon two known heritage assets, as a result of the Operational Scheme access track between the wind farm site and the B9007:
- MHG26505, what may be a farmstead comprising three unroofed buildings is depicted on the 1st edition of the OS 6-inch map (Nairnshire 1871-5-6, sheet xi), but it is not shown on the current edition of the OS 1:10000 map (1974); and
  - MHG6875, Rhilean township. Field survey identified extensive evidence over a wide area south of the farm shown by the 1st Edition Ordnance Survey map of 1870. Although the visible remains probably date to the 18th and 19th centuries, there could be earlier settlement beneath. Wall or dyke footings appear to lie across the line of the access track.
- 10.92 Mitigation by survey and recording during construction of the access track was agreed with THC and implemented by Headland Archaeology between September 2016 – May 2017 (Headland Archaeology, August 2017).
- 10.93 Two archaeological features were identified during the work; a rectangular structure at the outskirts of the settlement at MHG26505, and a linear feature – possibly an old track on the north-west side of Rhilean Burn.

### **Archaeological and historical narrative**

#### Prehistoric period

- 10.94 Within 5km of the ISA there are only five heritage assets recorded by THC HER that are likely to be prehistoric in date. These comprise: one kerb cairn (MHG7264) located on the floodplain of the River Findhorn 3km north of the ISA; and four hut circles, some occurring with lynchets and field systems. All these hut circle sites are located overlooking the River Findhorn; three on the 350m contour of Carn Sgumain, 5km NNE of the ISA, and the fourth is on the 270m contour of Tom na Slaithe, 3km west of the ISA.
- 10.95 There are no prehistoric period assets within the ISA, however a 0.5 to 1.0m high earth and stone mound was identified during previous survey in June 2014 on Carn Torr Mheadhoin, 500m west of the ISA, which is of potential prehistoric date.

- 10.96 Given the topography of the ISA, between 420 – 550m AOD, the potential for previously unknown prehistoric remains is negligible.

Early Medieval periods

- 10.97 Within the OSA are Scheduled Monuments of this period, including the fortified island and laird's house of the Isle of Moy (SM11446) located 8km to the west of the ISA, and Lochindorb Castle (SM1231), a stronghold of the Lords of Badenoch, located 10km to the north east.

- 10.98 There are no known heritage assets of early medieval period date within the ISA, however, to the north a possible pre-Reformation chapel is recorded at Daless.

- 10.99 The potential for previously unknown remains of this date to be preserved within the ISA is negligible.

Late Medieval period

- 10.100 There are no heritage assets of late medieval date within the ISA, or within 5km.

- 10.101 The potential for previously unknown remains of this date to be preserved within the ISA is negligible

Post-medieval/Later Historic periods

- 10.102 The majority of the known heritage assets in the region (5km of the ISA) recorded on THC HER are post-medieval / later historic period in date. Similar to those identified during previous surveys within the ISA, these predominantly comprise features relating to agriculture, such as farmsteads and buildings, clearance cairns, and field systems. Features relating to industry such as kilns, sluices and a water mill are also recorded in the wider study area. To the north-west, copper slag has been found at Kishorn evidencing copper working activity of perhaps post-medieval date. The importance of game hunting and shooting to the area is also indicated by the presence of such features as Drynahan Lodge to the north.

- 10.103 Similar to prehistoric assets recorded in the wider vicinity, and later historic period assets recorded through survey within the ISA, known later historic period assets in the wider study area are largely concentrated in the river valleys to the west and north of the ISA.

- 10.104 The nearest known heritage assets to the ISA include two farmsteads (MHG6875, 25448), Rhilean township (MHG54495) and a shieling hut (MHG54496). These are all located directly alongside watercourses. These built assets were recorded during walkover survey in 2009 as part of an environmental assessment for a possible access route for Tom nan Clach Wind Farm (Infinergy, 2009). Thirty-three structures were identified and recorded, most of which were within three post-medieval rural settlements in the Rhilean Burn valley. Rhilean settlement is identified on the 1st Edition OS 1:10560 map, showing one large roofed building, and referred to as Rhilean Burn 2 on THC HER. Eleven structures were recorded at Rhilean township in varying states of preservation that suggest multiple periods of occupation. The buildings were mostly small and round-ended with sub-rectangular outshots consisting of low, turf-covered footings. Some remains are very low to the ground, with only the turf-covered stone footings surviving.

- 10.105 There is a well preserved, stone-lined corn kiln and attached kiln-barn of turf and stone. The most recent structures are of low, double-faced dry-stone construction. There is also clear evidence of two phases of enclosure, of cultivation in the surrounding fields, and of a turf mound with stone footings and ditch enclosure that surrounds most of the site and partially underlies a later enclosure. Previous assessments have therefore identified the potential for hitherto unknown subsurface remains associated with Rhilean township to extend within the ISA. As a result, archaeological monitoring was carried out in the vicinity during construction of the access track for the Operational Scheme. These mitigation works recorded a linear feature interpreted as a possible old track on the north-west side of Rhilean Burn (Headland Archaeology, 2017).
- 10.106 There are nine known heritage assets, or sites of, within the ISA dating to the post-medieval/later historic period. One, a farmstead, is recorded on THC HER and the remainder have been added to the gazetteer through previous survey and historic map regression. These assets include one farmstead (site of, excavated during construction of the access track for the Operational Scheme) (MHG26505) associated with a D-shaped enclosure (HA1) which was protected from impact throughout the previous construction works. Previous surveys in 2007 and 2014 identified five shieling huts (HA3, 5, 6, 7 & 8) located in close proximity to watercourse Allt Carn an t-Sean-liathanaich.
- 10.107 A track with fords over streams (HA2), including Allt an t-Sragain Mhor, is visible on the First Edition Ordnance Survey map of 1871-76 (Nairnshire, Sheet X). The track and fords are still present on the map of 1906 (Nairnshire Sheet X.SE), and the track is still utilised today.
- 10.108 At the proposed access to the ISA, following existing tracks and the access constructed for the Operational Scheme, the present route of the B9007 overlies the Duthil-Dulsie Military Road (MHG34405).
- 10.109 Given the extent of previous survey and mitigation, there is considered to be nil archaeological potential for further remains within the ISA in the vicinity of Rhilean township (MHG6875) or farmstead MHG26505.
- 10.110 There is a negligible archaeological potential for previously unknown historic period heritage assets within the ISA, other than alongside the cluster of known heritage assets on the banks of the watercourse Allt Carn an t-Sean-liathanaich, where the potential is low for remains likely associated with shieling activity.

Modern period

- 10.111 An aircraft crash site is recorded within 2km of the ISA (MHG30846). THC HER records that a Sea Hawk crashed on May 5th, 1959 (Serial No. WM986. Sqd. 736). No further details surrounding the circumstances of the crash are provided. The accuracy of the location of the crash site is uncertain, however it is considered unlikely that this would have extended to an area including the ISA, 1.7km to the west. It is assumed that the crash was recovered, and no archaeological potential remains.
- 10.112 Within the ISA there is one modern feature: during walkover survey in June 2014 a walkers' cairn was visible (HA9), measuring 0.8 m diameter and 0.4 m high drystone cairn overlay a low earth mound, measuring 2 m in diameter and

approximately 0.2 m in height. In the vicinity of the ISA, further walkers' cairns are recorded by previous surveys.

- 10.113 There is considered to be a negligible potential for previously unknown modern remains of archaeological significance located within the ISA.

Undated

- 10.114 Survey in 2007 for Tom nan Clach Wind Farm (Infinergy, 2009) identified a possible cairn within the ISA. This is located alongside watercourse Allt Carn an t-Sean-liathanaich, in a cluster of four shieling hut remains. Whilst it is possible the cairn is prehistoric, it is most likely later historic footings of another shieling, relating to shieling activity, or a natural mound.

**Archaeological potential of the ISA**

- 10.115 The archaeology within 5km of the Proposed Development, as recorded on the HER, indicates that human activity is largely restricted to sheltered valleys and habitable land below approximately 300m AOD.
- 10.116 With the exception of a narrow strip alongside the A835 and the slopes of Coire Bhratag, the ISA is entirely above 300m AOD. The land alongside the A835 is on a north-facing slope and is of limited suitability for settlement or cultivation. The slopes around Coire Bhratag are south-facing marginal land, given over to upland grazing.
- 10.117 The ISA has been subject to previous surveys and investigations, which have identified three previously unrecorded heritage assets – none of which relate to settlement or cultivation activity.
- 10.118 The distribution patterns of known archaeology in the study areas, the results of previous surveys in the ISA, and the topography of the area suggest that the ISA is of negligible archaeological potential, other than alongside the cluster of known heritage assets on the banks of the watercourse Allt Carn an t-Sean-liathanaich, where the potential is low for remains likely associated with shieling activity.
- 10.119 Given the extent of previous survey and mitigation, there is considered to be nil archaeological potential for further remains within the ISA in the vicinity of Rhilean township MHG6875 or farmstead MHG26505.
- 10.120 Peat began forming within the ISA in the Quaternary period up to 3 million years ago. Peat, which survives under waterlogged conditions and therefore has excellent preservation potential for organic remains, also potentially seals an undisturbed ground surface with archaeological potential. Study of the organic remains preserved within stratified peat deposits enables the construction of a narrative of changes to the surrounding environment brought about by human activities and natural events in the prehistoric and historic periods. The lack of any archaeological remains noted within the peat during the construction of the Operational Scheme, however, suggests the palaeoenvironmental potential of the ISA located immediately south and east is low.



### **Heritage assets considered for setting effects**

- 10.121 Each asset in the OSA is presented in the Gazetteer (See Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 4, **Appendix 10.A**).
- 10.122 There are no World Heritage Sites, Conservation Areas, Inventory Battlefields or Category C Listed Buildings within the OSA.

#### Inventory Gardens and Designed Landscapes

- 10.123 There are seven IGDLs within the OSA, none of which have been retained for detailed assessment in this chapter. Of the seven IGDL, five lie outwith the ZTV. The remaining two, GDL32 Aultmore and GDL325 Relugas lie partially within the ZTV; it was considered that long distance views towards the Proposed Development do not contribute to the cultural significance of these IGDLs, which are understood and appreciated within their immediate and local settings within woodland and agricultural fields.

#### Scheduled Monuments

- 10.124 There are 14 Scheduled Monuments (SMs) within the OSA. Six of the SMs lie outwith the ZTV and are not retained for detailed assessment in this chapter. The remaining eight SMs are within or partially within the ZTV. Of these, one has been retained for detailed assessment of potential effects resulting from change in its setting as a result of the Proposed Development:

- SM1231 Lochindorb Castle. Located 9.8km east of the ISA, the castle comprises the substantial remains of a 13th century island castle.

- 10.125 As a Scheduled Monument, the castle is of High importance. As well as its intrinsic archaeological potential and interest, Lochindorb Castle SM1231 is considered to derive part of its cultural significance from its wider landscape setting, situated as it is on an island on Lochindorb with views extending in all directions. It is considered that the ability to view the wider landscape from the island contributes to its cultural significance. Visual change caused by the potential incremental impact of the Proposed Development in combination with the Operational Scheme, as well as the potential incremental impact of the Proposed Development in combination with other existing, consented and proposed wind farms, could result in a cumulative effect on the cultural significance of the monument. These scenarios are considered separately below.

- 10.126 The remaining SMs within or partially within the ZTV were considered to derive their cultural significance from their intrinsic archaeological interest and from in their local setting. Long range views towards the Proposed Development are not considered to contribute to the cultural significance of the remaining SMs and they are therefore not retained for detailed assessment in this chapter.

#### Listed Buildings

- 10.127 There are 41 Category A Listed Buildings (LBs) and 17 Category B LBs within the OSA. Of these, 43 lie outwith the ZTV and are not retained for detailed assessment in this chapter. The remaining LBs within or partially within the ZTV are considered to derive their cultural significance from their intrinsic architectural interest and from their local setting. Long range views towards the Proposed Development site are not considered to contribute to the cultural

significance of the remaining LBs and they are therefore not retained for detailed assessment in this chapter.

Non-designated heritage assets

- 10.128 There are eight non-designated heritage assets within the ISA and a further five within the 2km OSA. It is considered that whilst the general presence of the Proposed Development would constitute a material change in the setting of these monuments, it would not represent an impact on their cultural significance. The assets derive their cultural significance from their intrinsic archaeological potential and historic interest through their immediate setting in the landscape. It is considered that the presence of the Proposed Development would not materially detract from how these heritage assets are experienced, understood and appreciated in their immediate setting and they are therefore not retained for detailed assessment in this chapter.

**Identification and evaluation of effects**

- 10.129 Likely significant environmental effects have been considered after taking into account any inherent mitigation designed into the project, set out in **Chapter 3: Description of the Proposed Development.**

Construction effects

Direct impacts

- 10.130 There are eight known heritage assets located within the ISA identified in Table 10.6 below. These assets are all of low (local) importance.
- 10.131 Features HA2 and HA9 identified through walkover survey are excluded from the impact assessment in this chapter as they are of negligible importance.
- 10.132 Given the extent of previous survey and mitigation, there is considered to be nil archaeological potential for further remains within the ISA in the vicinity of farmstead MHG26505 access track, or Rhilean township MHG6875 which lies outwith but alongside the ISA access track.

**Table 10-6 Heritage assets within the ISA**

Ref	Name	Description	E	N	Period	Status	Importance
MHG26505	Rhilean Burn	What may be a farmstead comprising three unroofed buildings is depicted on the 1st edition of the OS 6-inch map (Nairnshire 1871-5-6, sheet xi), but it is not shown on the current edition of the OS 1:10000 map (1974). Information from RCAHMS (SAH) 9 August 1996. Asset was fully investigated and recorded during construction of access track for the Operational Scheme.	291200	838698	Later Historic	Non-designated	Low
HA1	D-shaped drystone enclosure (asset 126, 2009 survey)	'D'-shaped drystone enclosure wall built into 'D'-Shaped mound; 1m-high drystone retaining wall along mound edge; S-facing entrance.	291030	838700	Later Historic	Non-designated	Low
HA3	Shieling hut (asset 67, 2007 survey)	A shieling hut was recorded beside a river during walkover for the Tom nan Clach Wind Farm at NH 87414 34322. During walkover survey in June 2014, a roughly 5m by 3 m crudely rectangular drystone feature was identified, oriented NE/SW, standing to a height of 0.5 m. It was located between NH 87432 34340 and NH 87431 34340.	287430	836206	Later Historic	Non-designated	Low
HA4	Possible cairn (asset 68, 2007 survey)	Possible cairn, on a small ridge rising 1.5m above surroundings. Deep ditch / river channel on west side. Situated within 'bowl' of eroded river bank from 3 to 4 m high. During walkover survey in June 2014 no clear sign was encountered of this feature, though there was a slight (c.1 m high) rise in this area.	287390	834260	Uncertain	Non-designated	Low

Ref	Name	Description	E	N	Period	Status	Importance
HA5	Shieling hut (asset 69, 2007 survey)	Shieling hut - probable door 4m from south end, identified during walkover survey for Tom nan Clach wind farm. During walkover survey in June 2014, a roughly 8m N/S by 3 m E/W crudely rectangular drystone feature was identified, standing to a height of 0.5 to 0.7 m. It was centred at NH 87418 34251.	287400	834260	Later Historic	Non-designated	Low
HA6	Shieling hut (asset 70, 2007 survey)	Shieling hut, with annexe, identified during survey for Tom nan Clach wind farm. During walkover survey in June 2014 a rectangular feature, marked by earth and stone banks, was identified with corners at NH 87368 34128, NH 87366 34131, NH 87370 34136 and NH 87375 34135, measuring c. 7 m by 3m and between 0.5 and 0.7 m in height, incorporating a 2 m by 3 m annexe to the north.	287370	834130	Later Historic	Non-designated	Low
HA7	Shieling hut (asset 71, 2007 survey)	Small structure (probable dairy store), cut into the bank, identified during survey for Tom nan Clach wind farm. During walkover survey in June 2014 a 4 m diameter subsquare hollow was seen at NH 87365 34118	287365	834118	Later Historic	Non-designated	Low
HA8	Shieling hut (asset 160, 2014 survey)	During walkover survey in June 2014, a roughly 8m N/S by 3 m E/W crudely rectangular drystone feature was identified, standing to a height of 0.5 to 0.7 m. It was centred at NH 87418 34251. This may be the same as Site 69 [HA6].	287418	834251	Later Historic	Non-designated	Low

- 10.133 These eight non-designated heritage assets have been avoided through design and will not be directly impacted by the Proposed Development.
- 10.134 Of these heritage assets MHG26505 lies within the existing access track for the Operational Scheme (and Rhilean township MHG6875 lies outwith but alongside the ISA access track); it is proposed this access track will be used for the Proposed Development, however, given that these assets were fully investigated and recorded during a previous investigation between September 2016 – May 2017 (Headland Archaeology 2017), it is considered that there is no further potential for associated remains to exist within the Proposed Development ISA.
- 10.135 There will therefore be no direct impact on these heritage assets as a result of any upgrade to the access track in this area.
- 10.136 Accidental direct impacts upon the other heritage assets within the ISA may however arise should activities such as, but not limited to, ancillary drainage works and uncontrolled plant movement take place in the vicinity of these heritage assets.
- 10.137 Whilst it is considered that the palaeoenvironmental potential of the ISA is low, there remains a low potential for palaeoenvironmental deposits to be directly impacted as a result of the removal of peat during the construction phase. Mitigation regarding potential direct impacts on palaeoenvironmental deposits is outlined below.

Archaeological potential

- 10.138 The ISA is considered to be of negligible archaeological potential, other than alongside the cluster of known heritage assets on the banks of the watercourse Allt Carn an t-Sean-liathanaich, where the potential is low for remains likely associated with shieling activity.
- 10.139 Whilst it is considered that the palaeoenvironmental potential of the ISA is low, there remains a low potential for palaeoenvironmental deposits to be directly impacted as a result of the removal of peat during the construction phase.
- 10.140 Direct construction impacts on previously unknown heritage assets in the ISA is therefore possible. An assessment of effect and significance cannot be meaningfully evaluated for unknown heritage assets, as neither the cultural significance of the asset nor the magnitude of the impact can be known. Consequently, only the likelihood of construction effects is considered.
- 10.141 Based on the assessment of known heritage assets in the vicinity, any effect resulting from an impact upon archaeological remains discovered during the construction-phase is unlikely to be of greater than **Minor significance**.

Construction phase setting effects

- 10.142 The assessment of potential setting effects upon heritage assets within the ISA and OSA as a result of the construction stage of the Proposed Development, through the introduction of increased traffic, construction noise/dust, and the visual intrusion of cranes etc to the landscape, is the same as those assessed under 'operational effects' below, although construction effects would be temporary and therefore not significant in EIA terms due to their very short duration.

Operational, including cumulative setting effects

- 10.143 Following the results of the Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 4, **Appendix 10.A**), summarised above, one heritage asset is selected for detailed assessment in this chapter. This is Lochindorb Castle (SM1231), which is located 10km to the east of the Proposed Development.
- 10.144 Operational effects on the cultural significance of Lochindorb Castle have been assessed for three different scenarios:
- Assessment Scenario 1 considers the impact of the Proposed Development on the cultural significance of Lochindorb Castle with an assessment baseline where the Operational Scheme and Berryburn Wind Farms are already visible in the setting of the castle.
  - Assessment Scenario 2 considers the impact of the Proposed Development on the cultural significance of Lochindorb Castle with an assessment baseline including all other operational, consented and submitted applications for wind farms that would be seen in the setting of Lochindorb Castle. These comprise the Operational Scheme, Berry Burn and Berry Burn 2 (operational), Cairn Duhie (consented), Clash Gour (application) and Lethen (submitted as a planning application in January 2022).
  - Assessment Scenario 3 considers the combined (cumulative) impact of the Proposed Development with all other operational, consented and submitted applications for wind farms that would be seen in the setting of Lochindorb Castle, as listed for Scenario 2.
- 10.145 Thus, while Assessment Scenarios 1 and 2 examine the additional or incremental impacts of the Proposed Development, Scenario 3 looks at the overall or in-combination impacts of all the developments included in the assessment.
- 10.146 Consideration of these three scenarios is preceded by an analysis of the cultural significance of Lochindorb Castle, focussing on the contribution made by setting to that significance (i.e. Stage 2 of the approach set out in Managing Change in the Historic Environment: Setting (Historic Environment Scotland, 2016 updated 2020). This is relevant to all three assessments that follow.

*The cultural significance of Lochindorb Castle*

- 10.147 Lochindorb Castle ('Lochindorb') is a medieval stone castle on an island in Lochindorb. The castle is understood to have been built by the Comyn Earls of Badenoch in the later part of the 13th century but it is first documented in 1303. It finally fell out of use in the mid-15th century when it was slighted on the orders of James II. It has been a ruin ever since but its remote and inaccessible island location has ensured that it has survived as a substantial ruined structure.
- 10.148 The castle is a well-preserved example of a 13th century enclosure castle, originally comprising a simple quadrilateral walled enclosure with rounded corner towers. There is a substantial secondary enclosing wall of uncertain date wrapping around the east and north sides of the original castle. The relatively early abandonment of the site in the 15th century and absence of later

disturbance or re-use means that the original form and fabric of this castle are particularly clear. Exploration of the underwater portions of the island on which the castle sits has raised the possibility that it is an artificial construction but it is entirely unclear whether this would have been created for the castle or had an earlier use. Nevertheless, this all adds to the intrinsic significance of the site.

- 10.149 The castle may be compared with other similar contemporary castles, such as Inverlochy near Fort William, and it makes an important contribution to our understanding of what is an early stage in the evolution of stone castles in Scotland in the 13th century. Lochindorb may also be understood in the context of regional power politics in the medieval period. It was probably built by the Comyn Earls of Badenoch in a strategic position at the point where Badenoch borders on Moray. It continued to have a strategic function as ownership passed to the Earls of Moray and later to the Douglas family.
- 10.150 The castle is associated with many important individuals and events during its two centuries of use. Its origins are linked to the rise of the Comyn family in the north during the 13th century which subsequently led to its use by Edward I of England during his occupation of Scotland in the years around 1300. The Comyns lost Lochindorb only a few years later as part of their general eclipse following the rise of Robert Bruce and it passed into Crown ownership. Throughout the 14th century, Lochindorb remained closely associated with the shifting fortunes of the Scottish Crown and was notoriously associated with Alexander Stewart, son of Robert II and better known as the Wolf of Badenoch. His ability to conduct violent acts with impunity and ignore Crown authority rested in part on his control of secure and remote strongholds such as Lochindorb.
- 10.151 The cultural significance of the site therefore derives from a variety of intrinsic, contextual and associative characteristics. The contribution that setting makes to this cultural significance relates to our ability to experience and appreciate Lochindorb Castle as a remote military stronghold, controlling a direct route through the hills between Moray and Badenoch. Lochindorb would have been a remote location in the medieval period and it remains so today.
- 10.152 Today, the castle ruin on its island in the loch stands alone, surrounded by largely uninhabited open hillsides. The only prominent building on the loch shore is Lochindorb Lodge, a 19th century hunting lodge. Two operational wind farms are also visible in the setting of the castle: the Operational Scheme to the west and Berry Burn to the north-east.
- 10.153 The topographic position of the castle in a loch surrounded by higher ground creates a relatively small and enclosed setting with the summits of adjacent hills generally less than 2km from the loch shore. The enclosing hillsides, particularly to the east and north-west provide views overlooking the loch. These hillsides are publicly accessible through 'right to roam' but are not commonly visited.
- 10.154 The remote island setting is best experienced by reaching the castle itself but it is inaccessible without a boat and is therefore similarly not commonly visited. The castle is experienced by most people when travelling along the east shore of the loch, which is followed by a minor road between the A939 at Dava and the B9007 Carrbridge to Forres road. There are good close-range views of the castle from the north end of the loch as far as the woodland around Lochindorb Lodge, particularly when travelling south. Here the castle is as little as 300m



from the shore. The Operational Scheme is currently visible on the skyline behind the castle (at a distance of 10.8km) in these views from the loch shore and is also visible from the castle island (Volume 3, **Figures 10.8-10**).

- 10.155 The remote island location of the castle can also be experienced where this same road climbs up to join the B9007 at the south end of the loch. There are views over a 500m section of the road looking north-east up the length of the loch with the castle visible in the middle distance beyond the lodge. The operational Berry Burn Wind Farm is currently visible on the skyline behind the castle (at a distance of 12km) in this view (Volume 3, **Figure 10.7**).
- 10.156 Collectively, these sequential views from the eastern shore and from one section of the road to the south-west allow us to appreciate the strong defensive position of the castle in the loch, its remote location in the hills and its strategic position on the route between Moray and Badenoch, still followed by the present-day road along the loch shore. They constitute the keys views of the castle in its setting and make a positive contribution to the contextual characteristics of this heritage asset.

*Assessment Scenario 1: Impact of the Proposed Development on the setting of Lochindorb Castle, with baseline including the operational Tom nan Clach and Berryburn Wind Farms*

- 10.157 Assessment Scenario 1 considers the impact of the Proposed Development alone if it was added to the current setting of Lochindorb Castle, which already includes the Operational Scheme and Berry Burn Wind Farms.
- 10.158 The visual relationship between Lochindorb Castle and the Proposed Development is illustrated by a bare-ground ZTV for the proposed wind turbines (Volume 3, **Figure 10.3**), a wireline view from the castle towards the Proposed Development (Volume 3, **Figure 10.8**) and two photomontage views of the castle from the road along the east shore of the loch. The more northerly of these two photomontages (Volume 3, **Figure 10.9**) is taken at the point where the castle first comes into view as the road reaches the shore at the north end of the loch. The other (Volume 3, **Figure 10.10**) is a point along the shore close to the castle where the Proposed Development and the Operational Scheme appear directly behind the castle.
- 10.159 The ZTV (Volume 3, **Figure 10.3**) predicts that the Proposed Development would be visible from the castle itself and from some parts of its setting, including the hillside to the east of the loch and, most notably, from the road along the east shore. The ZTV for the Proposed Development is very similar to that of the Operational Scheme. It is clear from the wireline and photomontages for the castle that these two wind farm developments would always be experienced in the setting of the castle as a single cluster of wind turbines, at least 10km away on the western horizon.
- 10.160 The seven wind turbines of the Proposed Development would be seen partially overlapping the existing 13 wind turbines of the Operational Scheme and extending the horizontal spread of the cluster to the south. There is some screening by the intervening landform, depending on the precise viewpoint, but at least the blades of all seven wind turbines of the Proposed Development would be visible at the three illustrated viewpoints (Volume 3, **Figures 10.8-10**).

- 10.161 The location of the Proposed Development means that it would be seen both from the castle in views looking west and in combination with the castle in views of the castle when travelling south on the road along the east shore of the loch. These views are illustrated in Volume 3, **Figures 10.8-10**). The presence of the Proposed Development would not change views of the castle from the minor road to the south-west of the loch.
- 10.162 The presence of the Proposed Development in the setting of Lochindorb Castle would increase the visual prominence of an existing cluster of wind turbines in views looking west from the castle and in views of the castle from the road on the east shore of the loch. Experience of these key views (particularly those from the readily accessible loch shore) contribute to our appreciation of the strong defensive position of the castle in the loch, its remote location in the hills and its strategic position on the route between Moray and Badenoch.
- 10.163 The presence of the Proposed Development in keys views would diminish the sense of remoteness but the magnitude of this impact is limited by the distance between proposed turbines and the castle (at least 10km) and the fact that this part of the horizon is already occupied by the Operational Scheme. In this context, the presence of the Proposed Development is judged to be an adverse impact of **Negligible magnitude** on the cultural significance of Lochindorb Castle. This is considered to be an effect of **Minor significance**. This conclusion is **not significant** in EIA terms and is not considered an adverse effect upon the integrity of the scheduled monument's setting.

*Assessment Scenario 2: Impact of the Proposed Development on the setting of Lochindorb Castle, with baseline including all other operational, consented and submitted applications for wind farms*

- 10.164 Assessment Scenario 2 considers the impact of the Proposed Development alone if it was added to the potential future setting of Lochindorb Castle, which could include the operational Tom nan Clach and Berry Burn Wind Farms, Cairn Duhie Wind Farm (should the consent be implemented) and the proposed Clash Gour and Lethan Wind Farms, were these two applications to be consented and implemented.
- 10.165 A ZTV for Cairn Duhie, which would be located at least 6km north of the castle, indicates that the only part of the setting in which it would be visible is the west-facing hillside to the east of Lochindorb (Volume 3, **Figure 10.4**). Visibility declines as a visitor descends this slope and the wind farm would be totally screened by intervening hills just before reaching the east shore of the loch. Cairn Duhie would not be visible from anywhere on the loch itself; nor would it appear in any readily accessible views of the castle from the shoreline or from the road to the southwest of the loch.
- 10.166 A ZTV for Clash Gour, which would be located almost 10km to the north-east of the castle, demonstrates that it would be visible from the same parts of the setting as the operational and consented Berry Burn schemes (Volume 3, **Figure 10.5**). A wireline view from the minor road to the south-west of Lochindorb shows how it would occupy the same part of the horizon to the north-east of the castle as the Berry Burn schemes (Volume 3, **Figure 10.7**). Its presence (if consented) would therefore result in very limited change to the experience of Lochindorb Castle.

- 10.167 In contrast, the proposed Lethen Wind Farm would be located in the same field of view as the Operational Scheme, west of the castle. However, it would be significantly closer (as little as 4km) with these proposed wind turbines appearing considerably larger and more prominent in the view. This is illustrated by a cumulative ZTV (Volume 3, **Figure 10.6**), a cumulative wireline from the castle (Volume 3, **Figure 10.8**) and cumulative wirelines from the two viewpoints on the loch shore (Volume 3, **Figures 10.9** and **10.10**). These two views also illustrate the fact that Lethen Wind Farm would occupy a considerably larger portion of the horizon behind the castle than the Operational Scheme (45° compared with 15°).
- 10.168 The presence of the proposed Lethen Wind Farm in front of both the Operational Scheme and the Proposed Development, both in views from the castle and of the castle from the loch shore, would act to considerably diminish the visual impact of the Proposed Development in these views. It follows that the magnitude of impact due to the Proposed Development would be reduced relative to Scenario 1 to such a degree that the cultural significance of the castle would not be materially altered. It is therefore concluded that in Scenario 2 there would be **no effect** on the cultural significance of Lochindorb Castle thus **not significant** in EIA terms and is not considered an adverse effect upon the integrity of the scheduled monument's setting.

*Assessment Scenario 3: Cumulative impact of the Proposed Development and other operational, consented and submitted applications for wind farms on the setting of Lochindorb Castle, assuming baseline of no wind farms*

- 10.169 Cumulative operational effects can occur when the contribution made to the cultural significance of a heritage asset is directly altered by the Proposed Development in combination with operational, consented and other proposed wind farms. The assessment of effects uses the same methodology applied in considering the likely effects of the Proposed Development alone. All analysis of asset significance and the contribution made by setting remains unchanged. All that is altered is the nature of visual change predicted for the one or more scenarios under consideration.
- 10.170 Visibility of turbines from the operational Tom nan Clach and Berry Burn Wind Farms in the setting of Lochindorb Castle raises the potential that there could be cumulative impacts of greater magnitude resulting from the combined presence of the Proposed Development and the operational Tom nan Clach and Berry Burn Wind Farms. In addition, Cairn Duhie and Berry Burn 2 Wind Farms would be visible in the setting of Lochindorb Castle should the consents be implemented and turbines within the proposed Clash Gour and Lethen schemes would be visible were these two applications consented and implemented.
- 10.171 A cumulative impact assessment is presented for the combined impact of the Proposed Development with the two operational wind farms (Berry Burn and Tom nan Clach), two consented wind farms (Cairn Duhie and Berry Burn 2) and two applications (Clash Gour and Lethen), assuming a baseline position of no wind farms in the setting of Lochindorb Castle. No other wind farms are considered to be sufficiently visible from Lochindorb, or sufficiently progressed in the planning process as of January 2022 to merit consideration in this assessment.

- 10.172 The Clash Gour, Berry Burn and Berry Burn 2 Wind Farms are all located to the north-east of Lochindorb with the proposed Clash Gour scheme wrapping around the two Berry Burn schemes (operational and consented). From the setting of Lochindorb Castle these three wind farms would be experienced as a single cluster on the north-east horizon; this is illustrated by a wireline from the minor road south-west of the loch at a range of at least 11.8km (Volume 3, **Figure 10.7**).
- 10.173 The Operational Scheme and the Proposed Development are located 10km to the west of Lochindorb with the proposed Lethen Wind Farm in front of them with wind turbines as close as 4km from the castle. All three of these schemes would be visible on the skyline in west-facing views from the castle itself and in the background of views towards the castle from the accessible east shore of the loch. The Lethen wind turbines would be most prominent in the view with the Operational Scheme and the Proposed Development forming a single cluster of smaller, more distant turbines behind Lethen. This is illustrated by cumulative wirelines from two viewpoints on the east shore of the loch (Volume 3, **Figures 10.9 and 10.10**) and from the castle itself (Volume 3, **Figure 10.8**).
- 10.174 As noted in Scenario 2, Cairn Duhie would only be visible from the west-facing hillside to the east of Lochindorb. It would not be visible from anywhere on the loch itself; nor would it appear in any readily accessible views of the castle from the shoreline or from the road to the south-west of the loch.
- 10.175 The combined effect of the seven wind farms is to extend the area within the setting of Lochindorb Castle from which wind turbines would be visible. In particular, wind turbines would be seen from the castle itself (Proposed Development, the Operational Scheme and proposed Lethen Wind Farms), accessible short-range views of the castle from the east shore (Proposed Development, the Operational Scheme and proposed Lethen Wind Farms) and elevated views overlooking the loch from the south-west (proposed Lethen, proposed Clash Gour, operational Berry Burn and consented Berry Burn 2 Wind Farms).
- 10.176 The way in which each of the seven wind farms affects the cultural significance of Lochindorb Castle is essentially the same as that already described for the Proposed Development alone in Scenario 1. All reduce, to a greater or lesser degree, the sense of remoteness in the setting of the castle. The relative impact would be greatest for the proposed Lethen Wind Farm which would be much closer to the castle and therefore more prominently than the other wind farms and would be seen both from the castle and in the background of informative views of the castle from the east shore of the loch. It therefore would have the greatest visual impact in key views. The Operational Scheme adds to the level of visual change in the same views as the proposed Lethen Wind Farm with the Proposed Development making another very minor addition.
- 10.177 The proposed Clash Gour, operational Berry Burn and consented Berry Burn 2 Wind Farms will have a very similar impact, all appearing at a similar scale in the same part of the skyline, in the background of the view from the south-west towards the castle on the island in the loch. The consented Cairn Duhie Wind Farm would be least apparent in the setting and would not be seen in any readily accessed and informative views of the castle.

- 10.178 The ability of a visitor to appreciate the strong defensive position of the castle in the loch and its strategic position on the route between Moray and Badenoch would be unaffected by the combined presence of these seven wind farm developments described above. Any adverse impact on the cultural significance of Lochindorb Castle would be restricted to one aspect of its contextual characteristics and there would be no impact on the associative and intrinsic characteristics that make a major contribution to the cultural significance of the castle.
- 10.179 In all cases, with the exception of the proposed Lethen Wind Farm, any reduction in the sense of remoteness would be kept to a low level by the distance of the visible turbines from the castle (in excess of 10km) and the presence of landform between the castle and the wind turbines, increasing the sense of visual separation. It is concluded that the cumulative change in the setting represents an adverse impact of **Medium magnitude** and **Moderate significance** on the cultural significance of the castle, thus **significant** in EIA terms. However, it is the proposed Lethen Wind Farm responsible for the majority of this combined impact as it is responsible for the majority of the predicted visual change in key views along the east loch shore and from the castle. In the absence of Lethen, the cumulative impact would be of only **Low magnitude**, an effect of **Minor significance**. This would be **not significant** in EIA terms and is not considered an adverse effect upon the integrity of the scheduled monument's setting.
- 10.180 In terms of direct effects, due to the nature of archaeological mitigation through preservation by record, it is considered that there is no potential for cumulative construction effects on previously unrecorded cultural heritage assets.

Decommissioning effects

- 10.181 Decommissioning of the Proposed Development would not directly impact upon any known cultural heritage assets, assuming that all land-take for the decommissioning works, including access, lies within the same footprint as the construction works and thus previously mitigated with no remaining archaeological potential.
- 10.182 Any identified operational effects in respect of the setting of heritage assets would be reversed.

**Mitigation measures**

- 10.183 The preferred mitigation option is always to avoid or reduce impacts through design, or through precautionary measures such as fencing off heritage assets during construction works. Impacts which cannot be eliminated in these ways will lead to residual effects.
- 10.184 Adverse effects may be mitigated by an appropriate level of survey, excavation, recording, analysis and publication of the results, in accordance with a written scheme of investigation (SPP paragraph 150 and PAN2/2011, sections 25-27). Archaeological investigation can have a beneficial effect of increasing knowledge and understanding of the asset, thereby enhancing its archaeological and historical interest and offsetting adverse effects.

Mitigation measures during construction

Direct effects

- 10.185 No direct impacts upon any known archaeological remains have been identified from turbines or associated infrastructure of the Proposed Development. Direct impacts may, however, arise should activities such as, but not limited to, ancillary drainage works and uncontrolled plant movement take place in the vicinity of these heritage assets.
- 10.186 It is recommended that the known heritage assets within the ISA are demarcated prior to construction works commencing in order to highlight their presence. This may be achieved through appropriate survey, demarcation/fencing and signage. It is recommended that the following heritage assets are fenced off with a suitable buffer throughout construction to prevent accidental damage:
- HA1 D-shaped drystone enclosure (asset 126, 2009 survey);
  - HA3 Shieling hut (asset 67, 2007 survey);
  - HA4 Possible cairn (asset 68, 2007 survey);
  - HA5 Shieling hut (asset 69, 2007 survey);
  - HA6 Shieling hut (asset 70, 2007 survey);
  - HA7 Shieling hut (asset 71, 2007 survey);
  - HA8 Shieling hut (asset 160, 2014 survey).
- 10.187 Should any element of the Proposed Development layout be subject to re-design, where necessary, it is recommended that a direct impact assessment is carried out by an experienced professional archaeologist. Should any such re-design or ancillary works result in a direct impact on any of the known heritage assets within the ISA, additional mitigation work is likely to be required.
- 10.188 Whilst it is considered that the palaeoenvironmental potential of the ISA is low, all wind turbines have been sited to avoid what can be classified as deep peat (defined as greater than 1m in depth) in order to minimise the potential for direct impacts on any potential buried physical or palaeoenvironmental remains. In the case of internal access tracks, crane pads and other wind farm infrastructure, deep peat has been avoided by micro-siting where possible although in some cases this has been unavoidable. Where wind farm infrastructure for the Proposed Development has been located in deep peat, embedded mitigation has been applied at design stage (e.g. the use of floating roads for internal access tracks) and a comprehensive range of measures which are contained in the Peat Management Plan in **Chapter 13: Hydrology, Hydrogeology and Geology** of this EIA Report.
- 10.189 Any direct construction effects upon previously unknown cultural heritage assets will be mitigated through a programme of archaeological works to include potential impacts upon or beneath peat. The scope and nature of any additional mitigation should it be required would be outlined in a written scheme of investigation and agreed with THC.

Setting effects

- 10.190 No significant construction phase setting effects have been identified. No mitigation is recommended.

Mitigation during operation

- 10.191 Operational effects of **Minor significance** that have been identified upon Lochindorb Castle SM1231 as a result of the Proposed Development are **not significant** in EIA terms. No mitigation is recommended.

Mitigation during decommissioning

- 10.192 No decommissioning effects are predicted for any cultural heritage assets. No mitigation is recommended.

**Residual effects**

- 10.193 Potential effects of the Proposed Development upon heritage assets resulting from its construction, operation and decommissioning are considered below.

Residual construction effects

Residual construction phase direct effects

- 10.194 No direct impacts upon any known heritage assets are anticipated and the ISA is considered to be of negligible archaeological potential, other than alongside the cluster of known heritage assets on the banks of the watercourse Allt Carn an t-Sean-liathanaich, where the potential is low for remains likely associated with shieling activity.
- 10.195 A programme of mitigation would, if required, be agreed with THC to offset any potential direct effects on known and previously unknown heritage assets which may exist within the ISA. Following agreement of these works, if required, no residual effects are anticipated upon known and/or potential heritage assets within the ISA.

Residual construction phase setting effects

- 10.196 Construction phase setting effects would be temporary and are not considered to be significant in EIA due to their very short duration.

Residual operational effects

- 10.197 A residual effect of **Minor significance**, which is **not significant** in EIA terms, is predicted on Lochindorb Castle SM1231 throughout the operation of the Proposed Development.
- 10.198 Cumulative impact assessment, considering all other operational, consented and submitted applications for wind farms in the vicinity has identified no significant effects in EIA terms as a result of the Proposed Development.

Residual decommissioning effects

- 10.199 No direct residual decommissioning effects have been identified.
- 10.200 Although impacts have been assessed as if the development was permanent (SPP paragraph 170), on decommissioning the operational effects of **Minor significance** on Lochindorb Castle SM1231 would be reversed.



### Summary

- 10.201 Potential effects of the Proposed Development upon cultural heritage assets resulting from its construction, operation including cumulative effects, and decommissioning have been considered.
- 10.202 No direct effects upon any known archaeological remains have been identified. It is recommended that heritage assets are fenced off with a suitable buffer throughout construction to prevent accidental damage.
- 10.203 Any direct effect upon archaeological remains discovered during the construction phase is unlikely to be of greater than **Minor significance**.
- 10.204 Construction phase setting effects would be temporary and are not considered to be significant in EIA due to their very short duration.
- 10.205 A residual effect of **Minor significance**, which is **not significant** in EIA terms, is predicted on Lochindorb Castle SM1231 throughout the operation of the Proposed Development.
- 10.206 Cumulative impact assessment, considering all other operational, consented and submitted applications for wind farms in the vicinity has identified no significant effects in EIA terms as a result of the Proposed Development.
- 10.207 No direct residual decommissioning effects have been identified.
- 10.208 On decommissioning the operational effects of **Minor significance** on Lochindorb Castle SM1231 would be reversed.

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