



HISTORIC
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By email to:

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Ms Heather Kwiatkowski
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Longmore House
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samuel.fox@hes.scot

Our case ID: 300034216
10 June 2020

Dear Ms Kwiatkowski

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
Ackron Wind Farm
Pre-Application Advice – Visualisation Viewpoints

Thank you for your email which we received on 15th May 2020 providing us with additional information in support of the Akron Wind Farm proposals in the Scottish Highlands. We note that this information includes assessment viewpoints for the proposals, and we have reviewed these for our historic environment interests. This includes world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

You should also seek advice from the Highland Council's archaeology and conservation service for matters including unscheduled archaeology and category B and C-listed buildings.

Our Advice

We are content with the heritage assets identified for detailed assessment. We welcome that sites beyond 10km study area will be assessed for indirect impacts, as requested in our Scoping response (19 November 2019). However, we have some further advice which may be of assistance regarding the proposed viewpoints and the status of designated sites proposed for assessment.

Although **Knock Stanger (Scheduled Monument, SM458)** lies outwith the ZTV for the proposals, inward views of the monument from Sandside Bay would likely contain the proposed turbines. We therefore recommend that further visualisations demonstrating the impacts on the setting of the monument caused by the turbines appearing in these views are included in your assessment. In addition to this, we note that the information provided states that **Creag Bhreac Mhor, stone rows 200m ESE of (Scheduled Monument, SM 2386)** is located outwith the ZTV for the proposals. This is, however, not clear from the ZTV information included within the consultation (**Ref: 138-REP-022**) and we therefore consider that this should be clarified in your assessment.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



We also note that some of the designations included in your assessment are inaccurate. Reay Old Parish Church, for example, is identified as a listed building (LB14980). It should be noted, however, that Reay Old Parish Church was de-listed on 22 September 2016. This site is now designated as a scheduled monument (**Reay, burial ground, old church and cross slab, 175m E of Parish Church, Scheduled Monument 615**). The adjacent Reay Parish Church and enclosure wall is listed, however, at Category A (**Reay Parish Church and enclosure wall, LB14992**). We recommend that impacts on the setting of both these heritage assets are informed by separate visualisations.

Regarding the use of photographs, we would prefer that professional images be used for photomontages rather than field photographs, particularly in the assessment of **Halladale Bridge, hut circles 670m NE of, on banks of Giligill Burn (Scheduled Monument SM3304)**. We recommend that visualisations submitted in support of the application conform with standards required for an EIA assessment, as laid out by Scottish Natural Heritage (SNH) in their publication *Visual Representation of Wind Farms: Full Guidance* (<https://www.nature.scot/visual-representation-wind-farms-guidance>).

However, we appreciate that this may not be possible given current Covid-19 restrictions, so we are willing to accept field photographs at this stage. However please note that we reserve the right to withhold detailed comments on a forthcoming assessment if the imagery is not of a sufficient quality to make our assessment.

Further Information

A new Historic Environment Policy for Scotland (HEPS, 2019) was adopted on the 1st May 2019, which replaces the Historic Environment Scotland Policy Statement (HESPS, 2016). The new Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic Environment Guidance Notes. All of these documents are available online at www.historicenvironment.scot/heps.

Practical guidance and information about the EIA process can also be found in the EIA Handbook (2018). This is available online at <https://www.historicenvironment.scot/archives-andresearch/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbba8e800a592c0>

Please contact us if you have any questions about this response. The officer managing this case is Samuel Fox who can be contacted by phone on 0777 649 0296 or by email on samuel.fox@hes.scot.

Yours sincerely

Historic Environment Scotland

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



Historic Environment Scotland (HES)
Via email: HMConsultations@hes.scot
Cc: THC Historic Environment Team archaeology@highland.gov.uk

15th May 2020

Dear Sir/Madam,

Ackron Wind Farm Consultation (Ref: Highland Council 19/04756/SCOP; HES Ref: 300034216)

Dear Sir/Madam,

The scoping response dated 19 November 2019 (HES Ref: 300034216) noted that there is the potential for setting impacts beyond the proposed 10 km study area and recommended that further consideration of sites beyond 10 km are informed by ZTV analysis. HES identified the following assets to be assessed which may be impacted by the development:

- Halladale Bridge, hut circles 670m NE of, on banks of Gilgill Burn (SM 3304) – included in the assessment with a photo wireline representation;
- Knock Stanger, cairn 730m E of Sandside House (SM 458) – not within the ZTV but will be included in assessment;
- Reay, burial ground, old church and cross slab, 175m E of Parish Church (SM 615) – included in assessment with photomontage, LVIA VP #3;
- Bighouse, garden pavilion and walled garden (LB 7160) – included in assessment with a photo wireline representation;
- Sandside House, kiln barn and single storey range of former byres, cottage and dairy and implement shed (LB 14986) – included in the assessment;
- Reay Parish Church and enclosure wall (LB 14992) – included in assessment with photomontage, LVIA VP #3; and
- Sandside Harbour 1 and 2, Sandside and Fishing Store (LB 14988) – not within the ZTV but will be included in assessment.

We may have to use field photography from site visits for heritage photo wirelines if we cannot get the photographer to site to take SNH style photography due to Covid-19 restrictions.

Please find attached a figure showing viewpoints, noting the following:

- As detailed in the Updated Scoping Report, the turbines have shifted further to the south to reduce the visual effects upon the coast and North Coast 500;
- All heritage assets within 5 km will be included in assessment;
- Selected heritage assets beyond 5 km included within the assessment are documented in the tables below (scheduled monument in Table 1 and listed buildings in Table 2); and
- LVIA photomontages are from Reay burial ground and old parish church (SM615, LB14980) and Shebster Hill (SM476) with heritage photo-wirelines from Halladale Bridge Hut Circles (SM3304) and Bighouse (LB7160).

Could you please provide any comments by Friday 22nd of May?

Yours sincerely,

Heather Kwiatkowski, MCIFA
Principal Heritage Consultant

Table 1: Summary of Scheduled Monuments between 5- 10 km and Justification for Inclusion/Exclusion from EIA

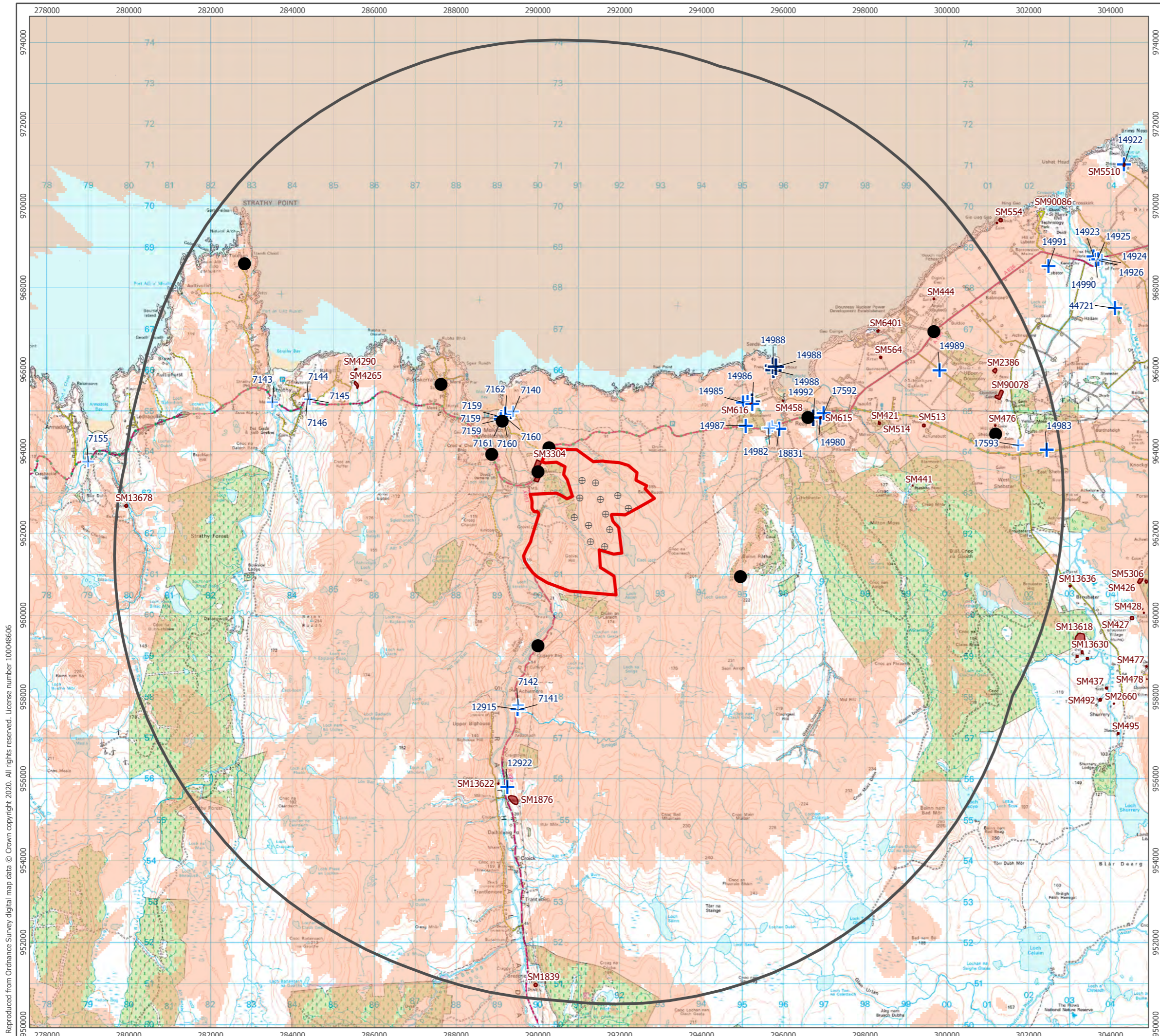
Designation Reference	Name	X	Y	Distance and Direction from Development	In Theoretical ZTV	Assessment Inclusion in EIA	Justification
SM421	Achvarasdal House, two stones N of	298332	964729	6.5 km NNE	Yes	No	Setting is Burn of Isauld and Dounreay Burn. The stones are located within dense mature woodland that is not commercial which limits any setting affiliation within the wider landscape. Visibility of the turbines would be screened by trees.
SM441	Clach Clais an Tuire, standing stone 1000m SE of Loanscorribest	299160	963166	9 km E	No	No	Setting is Achvarasdal Burn and turbines would not be visible.
SM444	Cnoc-na-h'Uiseig, chambered cairn	299680	967731	9 km NE	Yes	No	Setting is coastal. Site is surrounded by modern infrastructure (Dounreay Nuclear Facility). Located in open grassland between infrastructure.
SM476	Hill of Shebster, chambered cairn	301182	964635	9.2 km ENE	Yes	Yes	Elevated position with long distance views. LVIA VP10.
SM513	Achunabust, broch NNW of	299436	964634	7.5 km NNE	Yes	No	Setting is Burn of Isauld, Achiegullan Burn, and Dounreay Burn with key views looking NW downstream towards Reay and Sandside Bay.
SM514	Achvarasdal House, broch 65m NE of	298352	964687	6.5 km NNE	Yes	No	Setting is Burn of Isauld and Dounreay Burn. The broch is located within dense mature woodland that is not commercial which limits any modern setting affiliation within the wider landscape. Visibility of the turbines would be screened by trees.
SM564	Knock Urray, broch 400m NNE of Gunnscroft	298380	966302	7.2 km NE	Yes	No	Setting is coastal with key views N over the coastline and NW over Sandside Bay. Development would not be visible in key views but rather to the SW as part of the wider landscape context of inland moorland.
SM615	Reay, burial ground, old church and cross slab 175m E of Parish Church	296908	964819	5.2 km NE	Yes	Yes	LVIA VP #3 from road by church.

Designation Reference	Name	X	Y	Distance and Direction from Development	In Theoretical ZTV	Assessment Inclusion in EIA	Justification
SM1839	The Borg, broch, Strath Halladale	289943	950958	11 km SSW	Yes	No	Within ZTV but the Setting of the Broch is Strath Halladale with key views N/S along Halladale River. Whilst there is theoretical visibility, in actuality it is limited by land form and distance.
SM1876	Leathad Carnaich, hut circles, clearance cairns, N of Dalhalvaig School	289405	955485	6.5 km SSW	No	No	Setting of broch is Strath Halladale and River with key views N/S along river. Development is not visible from the SM or in key views N/S along lower elevations of Strath
SM2386	Creag Bhreac Mhor, stone rows 200m ESE of	301174	965975	9.5 km NNE	No	No	Not within the ZTV and setting is the lower north facing slopes of Hill of Shebster.
SM4265	Baligill, mill	285563	965637	5.9km NW	No	No	Setting is Baligill Burn with key views N/S along burn. Development would not be visible.
SM4290	Baligill Burn, limekilns	285546	966004	6 km NW	No	No	Setting is Baligill Burn with key views N/S along burn. Development would not be visible.
SM6401	Dounreay Castle	298314	966945	7.5 km NE	No	No	Not within ZTV and setting is coastal. Surrounded by Dounreay Nuclear Facility and modern infrastructure.
SM13622	Millburn, Strath Halladale, barrows 340m NNE of	289033	955881	6.4 km SSW	No	No	Not within the ZTV and setting is Strath Halladale with key views N/S along River Halladale. Development is not visible.
SM13678	Armadale Burn, broch 1420m SE of Armadale House.	279933	962670	11 km W	No	No	Setting is Armadale Burn with key views N/S along the burn. Development is not visible.
SM90078	Cnoc Freiceadain, long cairns	301286	965375	9.5 km NNE	Yes	Yes	Within ZTV and would be visible as a distant landscape feature only if forestry is removed from lime kilns

Table 2: Summary of Listed Buildings between 5- 10 km and Justification for Inclusion/Exclusion from EIA

Designation Reference	Name	X	Y	Distance and Direction from Development	In Theoretical ZTV	Assessment Inclusion in EIA	Justification
7143 7144 7145 7146 All Category C	STRATHY, BEN GRIAM STRATHY, FREE CHURCH OF SCOTLAND STRATHY FREE CHURCH MANSE STRATHY EAST, FREE CHURCH OF SCOTLAND, SCHOOL	283510 284387 284422 284361	965196 965268 965274 965268	7.3 km NW	No	No	Setting is Strathy and River Strathy. Development would not be visible from heritage assets or in views from Ben Griam across Strathy.
12922 Category B	LEATHAD CARNAICH, CHURCH OF SCOTLAND MISSION HOUSE	289255	955791	6.3 km SW	No	No	Setting is Halladale Burn with key views looking west over River Halladale and N/S along River. Development would not be visible.
14980 Category B	REAY, OLD PARISH CHURCH	296905	964831	5.2 km	Yes	Yes	LVIA VP #3
14983 Category B 17593 Category C	ACHIMENACH, REAY FREE CHURCH AND WALLED MEMORIAL SHEBSTER BARN	302440 301749	964039 964148	9km E	Yes	No	Setting is the hamlet of Shebster and the nearby agricultural fields which provide the context for the settlement. The Development is distant and largely hidden amongst landform with no change to setting of the listed buildings.
14988 Category A	SANDSIDE HARBOUR, 1 and 2, Sandside, Sandside and Fishing Store	295819	966070	5.9 km NE	No	Yes	Included due to higher level of sensitivity

Designation Reference	Name	X	Y	Distance and Direction from Development	In Theoretical ZTV	Assessment Inclusion in EIA	Justification
14989 Category B	UPPER DOUNREAY FARM STEADING	299820	965985	8.3 km NE	Yes	No	No - Setting is localised to surrounding agricultural fields which form the wider part of the farm. The Development is distant and largely hidden amongst landform with no change to the agricultural setting of the listed building.
14992 Category A	REAY PARISH CHURCH	296733	964822	8.8 km NE	Yes	Yes	LVIA VP #3



- Core Study Area
- Wind Turbines
- 10 km Study Area
- Zone of Theoretical Visibility
- Viewpoints
- Scheduled Monuments
- Listed Buildings
- + Category A
- + Category B
- + Category C

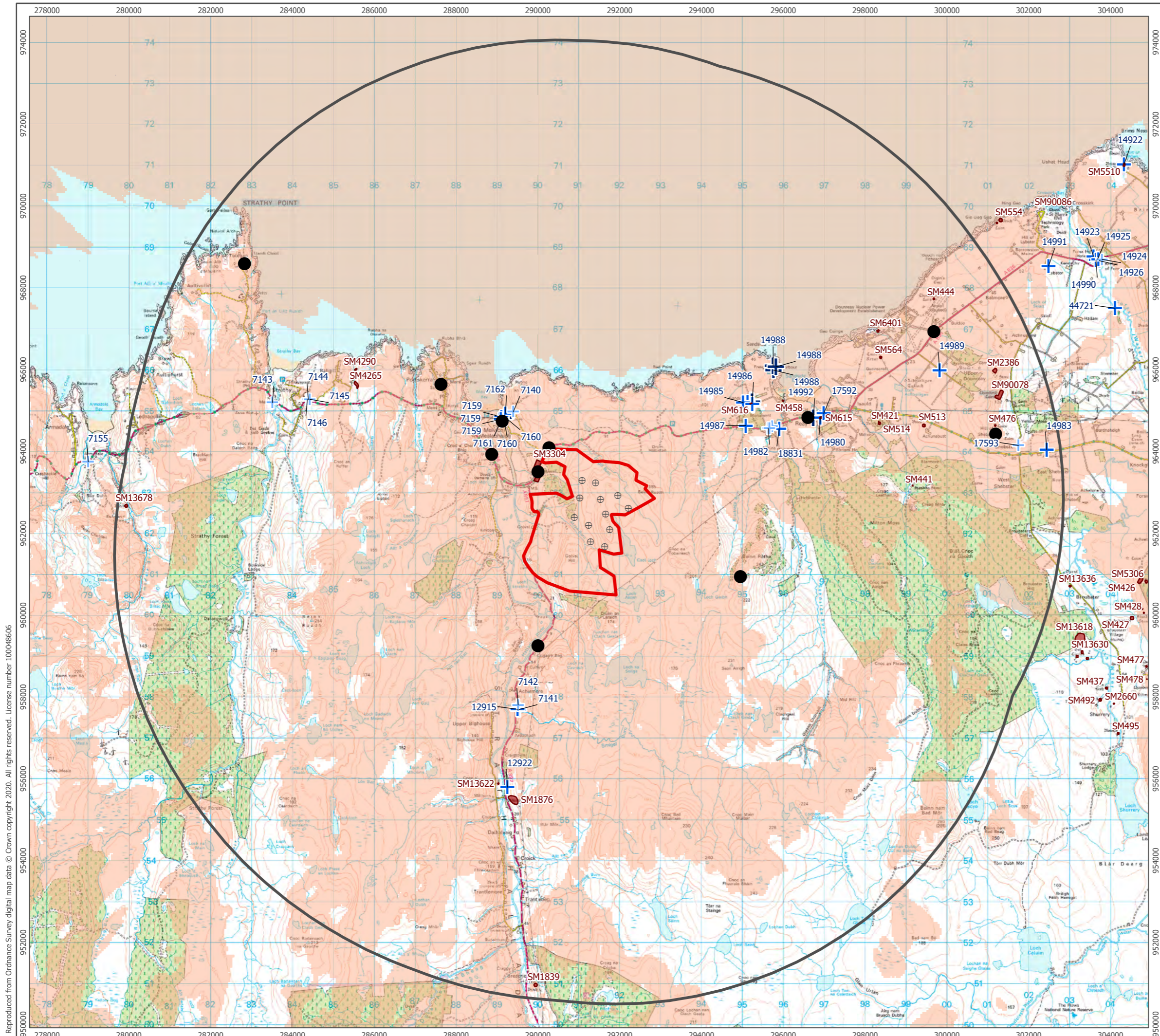


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Checked By: HK	Date: 12/05/2020

**Heritage Assets within 10km
Consultation Figure**

Ackron Wind Farm

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- Core Study Area
- Wind Turbines
- 10 km Study Area
- Zone of Theoretical Visibility
- Viewpoints
- Scheduled Monuments
- Listed Buildings
- + Category A
- + Category B
- + Category C

1:90,000 Scale @ A3

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**Heritage Assets within 10km
Consultation Figure**

Ackron Wind Farm

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