

9 Cultural Heritage

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9 Cultural Heritage

9.1 Executive Summary

- 9.1.1 AOC Archaeology Group prepared Chapter 9, Cultural Heritage of the 2019 EIA Report.
- 9.1.2 This chapter identifies the archaeological and cultural heritage value of the site and assesses the potential both for significant effects on archaeological features and heritage assets resulting from the construction, operation and decommissioning of the Proposed Development. This chapter also identifies measures that should be taken to mitigate predicted adverse effects.
- 9.1.3 This assessment focuses on the reassessment of indirect effects on Burgi Geos fort in respect of the 2020 layout and also in light of Historic Environment Scotland's (HES) comments dated August 2019. This assessment also takes into account comments from the Regional Archaeologist received in May 2019.

9.2 Introduction

- 9.2.1 This chapter considers the archaeological and cultural heritage value of the site and reassesses the potential for significant effects on archaeology and heritage assets resulting from the construction, operation and decommissioning of the 2020 layout.
- 9.2.2 AOC Archaeology Group prepared Chapter 9, Cultural Heritage of the 2019 EIA Report which established a baseline for the site and assessed in detail the potential for direct and indirect effects on archaeology and heritage assets arising from the 2019 layout. This assessment briefly considers any changes to the baseline since completion of the 2019 EIA. The heritage baseline thus established; an assessment is made of the potential for significant effects on archaeological features and heritage assets resulting from the construction, operation and decommissioning of the Proposed Development
- 9.2.3 This chapter also identifies measures that should be taken to mitigate predicted adverse effects.
- 9.2.4 This chapter has been produced by AOC Archaeology Group. AOC is a Registered Archaeological Organisation of the Chartered Institute for Archaeologists (CIfA). This chapter conforms to the standards of professional conduct outlined in the Chartered Institute for Archaeologists' Standards and Guidance for Historic Environment Desk Based Assessments (CIfA 2017); Commissioning Work or Providing Consultancy Advice on the Historic Environment (CIfA 2014) and follows IEMA's EIA Guidelines (as updated) (IEMA, 2016).
- 9.2.5 Historic Environment Scotland (HES) adopted The Historic Environment Policy for Scotland (HEPS) on the 1st May 2019. This policy document replaced the Historic Environment Scotland Policy Statement (HESPS) (HES, 2016). HEPS (HES 2019a) sets out the Scottish Government's policy for the sustainable management of the historic environment. Key principle HEP 4 states that "changes to the specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate. If detrimental impact on the historic environment is unavoidable it should be minimised. Steps should be taken to demonstrate that alternatives have been explored and mitigation measures should be put in place". HEPS is supported by HES's Designation Policy and Selection Guidance (2019c) which sets out designation criteria, which was previously included as an appendix of HESPS.
- 9.2.6 There have been no changes to Legislation or national and local planning policy since the production of the 2019 EIA Report.

9.3 Response to Consultation Responses

Historic Environment Scotland (HES)

- 9.3.1 HES provided a consultation response to the 2019 layout by letter on 8th August 2019 (HES 2019b). HES objected to the 2019 layout on the grounds that the Proposed Development would have a significant adverse impact on the integrity of the setting of Burgi Geos, promontory fort (scheduled monument Index No. 11274). Detailed reasons for the objection and comments on the 2019 EIA Report were set out in an Annex to the letter.
- 9.3.2 The Annex stated that HES were generally content with the 2019 EIA Report and methodology presented therein but raised some queries regarding the methodology for assessment of settings impacts. The Applicant acknowledges these comments but maintains that the methodology used in the 2019 EIA Report was robust. With regard to assessment methodology and the matrices in Tables 9.4 and 9.8 of the 2019 EIA Report it is maintained that a direct effect, which removes a physical part of an asset, remains more damaging than an indirect settings effect, which changes the surroundings of an asset but does not irreversibly remove the asset or deposits associated with it. The Applicant acknowledges that SPP 2014 does not explicitly distinguish between direct effects and setting effects however SPP 2014 makes clear that it is only adverse effects on the integrity of setting that would trigger the exceptional circumstances test thus implying that not all adverse effects on setting require the exceptional circumstances test to be met. The principle that a direct impact is greater than an impact on setting is also enshrined in UK heritage legislation which requires Scheduled Monument Consent for any physical impact upon a Scheduled Monument but does not require such consent for an impact on setting. The Applicant notes that despite reservations regarding the methodology HES identify only two assets where they disagree with the assessment presented within the 2019 EIA Report one of which, Burgi Geos, forms the focus of their objection.
- 9.3.3 The Annex to HES's letter sets out an assessment of Belmont House Inventory Garden and Designed Landscape (GDL). The impact on the setting of Belmont House does not form part of the HES objection. HES agree with the Applicant's assessment that the views along the main axis south to and from the house are of most importance in understanding the landscape. The Applicant maintains that views of turbines in other views would not impact on the ability to understand and appreciate Belmont House and its GDL in its setting and therefore the finding a minor and not significant effect is maintained.
- 9.3.4 The HES assessment of the setting of the Burgi Geos fort, and the impacts upon it, as presented in the Annex to their letter, largely agrees with the assessment presented within the EIAR Chapter, which identified a moderate and significant effect on the setting of Burgi Geos Fort. The principal area of disagreement lies with whether or not the visibility of the 2019 layout, specifically T1, T2 and T3, would affect the ability to appreciate the fort's relationship with the surrounding land and seascape and thus affect the integrity of the setting.
- 9.3.5 As set out in the 2019 EIA Report, the Applicant identified the key views towards the fort as being on close approach from the east and thus not affected by the Proposed Development. HES agree that these close views would not be affected. However, they also state that more distant views from the east are important for understanding how the architectural elements of the fort may have functioned together and how they relate to the promontory. The Applicant agrees with the statement by HES that views from the fort over the moor to the skyline to the east are likely to have been important for the fort's defence and this was acknowledged within the 2019 EIA Report. However, it is maintained that while these views are important, the placement of turbines on the open moorland would not diminish the ability to appreciate the relationship between the landform/skyline and the fort and its defensive function. The relationship with former settlements to the east would also remain legible particularly given that, as acknowledged by HES, the former level of settlement is 'shown on nineteenth century maps'. The fort is set on a precipitous coastal promontory which contributes to the character of the fort and understanding of its function and the Applicant maintains that the relationship between the fort and the coast is the most important part of its setting.
- 9.3.6 HES also note the importance of eastern approaches to the fort. However, the 19th century settlements to which HES refer are concentrated to the north of the fort. Access to the fort from a

landward approach should therefore also be considered in light of a northern connection and approach. The 19th century mapping examined within the 2019 EIA Report shows that routeways circumvented the eastern approach and high ground connecting settlements further east, in deep valleys to settlements to the north via a northern route. These routeways and the settlements shown on 19th century mapping generally did not exceed the 30m contour and as such the Proposed Development would be located above these key routeways and beyond the occupied and settled land which may have had visual relationships with the fort.

- 9.3.7 HES concluded by noting that removal of T2 would constitute direct mitigation and also noted that further assessment of potential impacts of T1 and T3 and associated access tracks and borrow pits would be required. They noted that relocation or deletion of these turbines may result in mitigation.
- 9.3.8 The Applicant met with HES, SNH and the Shetland Island Council on the 7th of October 2019 to discuss the Proposed Development. The Applicant noted their intention to remove turbines T1, T2, T3, and T7. HES issued a letter dated 21st October 2019 stating that these layout changes would reduce the level of impact on the setting of Burgi Geos promontory fort (SM 11274), to a level where they would not object to the Proposed Development (HES 2019c).
- 9.3.9 The 2020 layout removes T1, T2, T3 and T7 and also T29. All access tracks and borrow pits associated with these turbines would also be removed and thus there would be no visible infrastructure associated with the Proposed Development located to the west of the topographic ridge formed by the Hill of Vigon and Hill of Markamouth.

Shetland Regional Archaeologist

- 9.3.10 The Shetland Regional Archaeologist responded to the 2019 application by email on 17th May 2019 (Turner 2019). The response noted concerns regarding wording within the Cultural Heritage assessment that required consideration.
- 9.3.11 The Applicant can confirm that these concerns have been considered and subsequently applied to the wording used within this chapter with regard to the 2020 layout.
- 9.3.12 The 2019 EIA Report stated that 'Details of mitigation will be agreed in consultation with Shetland Amenity Trust through a Written Scheme of Investigation'. This is the standard means of agreeing details of archaeological programmes of work. The Regional Archaeologist specified that an archaeological watching brief would require to be carried out for '*all ground breaking works, including any which may take place outside of the development area (such as the preparation of lay-down areas, quarries or borrow pits*'. As noted by the Regional Archaeologist within the response, it is common practice for all ground breaking works within wind farm developments to be subject to a watching brief. The Applicant can confirm that this mitigation will be applied.
- 9.3.13 The Regional Archaeologist also requested additional clarification with regards to the Heritage Interpretation Plan stating the requirement to add that '*The Heritage Interpretation Plan will require to be agreed in advance and throughout its life, with the Regional Archaeologist on behalf of the Shetland Islands Council Planning Authority*'. This requirement for clarification is noted by the Applicant and has been subsequently adopted in this chapter.
- 9.3.14 The Regional Archaeologist also commented on the fact that Burgi Geos fort sits within an area of multiple associated mounds of potential archaeological significance and notes that '*These should be mapped and mitigation should be put in place to ensure their protection*'. The Applicant agrees that there are features in the vicinity of the Scheduled Burgi Geos fort that are likely be of archaeological interest. However, while these features were noted they were not surveyed as part of the 2019 EIA as they are not located within the application boundary and thus would not be subject to any direct impacts. The mitigation proposals in the 2019 EIA Report included provision for fencing of all features within 50m of working areas to prevent inadvertent damage to them. The 2020 layout would move proposed working areas further from the Burgi Geos and associated archaeological features and thus there would be no impact on these features and as such mitigation for their protection would not be necessary or required.

9.4 Assessment of Residual Effects

9.4.1 Following the change in design of the Proposed Development a re-assessment of the residual effects of the Proposed Development upon the receptors identified in the 2019 EIA Report has been undertaken. This assessment assumes that all mitigation detailed within the 2019 EIA Report is undertaken.

9.4.2 For avoidance of doubt and as outlined in Section 9.3 the archaeological mitigation will require to be agreed with the Regional Archaeologist on behalf of Shetland Islands Council Planning Authority through a Written Scheme of Investigation and will include extraction of a sediment core, fencing off archaeological features, a watching brief on all ground breaking works and a Heritage Interpretation Plan.

Construction

9.4.3 The Proposed Development has been designed, where possible, to avoid direct impacts on known heritage features. There have been no changes to the heritage baseline within the site since the 2019 EIA Report. The implementation of the mitigation measures outlined in the 2019 EIA report will prevent inadvertent damage to known heritage features within the site as shown on Figure 9.1; and investigate the potential for previously unknown features. Following the completion of construction and decommissioning works no further groundworks would be undertaken. No significant residual direct effects are anticipated.

Operation

9.4.4 Direct effects upon any previously unknown archaeological remains which may be present on the site would cease with the completion of the groundworks stage of construction and consequently no direct effects are predicted during the operational phase of the development.

9.4.5 Operational phase effects include impacts upon the settings of assets such as Listed Buildings, Scheduled Monuments, Conservation Areas and Inventory Gardens and Designed Landscapes. While there are no designated heritage assets within the site, this assessment has identified 44 Scheduled Monuments, 37 Listed Buildings and two GDLs within 10km of the site.

9.4.6 All designated assets located within the 10 km study area and the ZTV were subject to detailed setting assessment for the 2019 EIA Report. Additionally, all designated assets within the 10 km study area were reviewed against the information known about their contextual characteristics and against mapping information to identify any instances where views of the Proposed Development with a given asset may significantly impact on their settings. A total of 31 Scheduled Monuments, 24 Listed Buildings and two GDLs were subject to detailed setting assessment (Figure 9.2). These assets have been reassessed in light of the 2020 layout and this assessment is presented in Appendix 9.1

9.4.7 The revised settings assessment found that the effect of the Proposed Development on the setting of 54 designated assets would not be significant as the effect levels would be neutral to minor/moderate. These findings are listed in Table 1 within Technical Appendix 9.1 and have been informed by ZTV modelling, site visits, photomontages and wireframes as appropriate.

9.4.8 A detailed reassessment of Burgi Geos fort which was the subject of the HES objection has been undertaken and is presented below.

Burgi Geos Fort (Site 1)

9.4.9 The Scheduled Burgi Geos fort (Site 1) comprises a promontory fort of later prehistoric, perhaps Iron Age, date. The monument occupies a promontory set between steep cliffs of the North and South Burgi Geos. Approached from the east, the entrance way leading onto the narrow promontory is lined by a row of stone slabs to the north, while on the south it is flanked by a mound studded with upright stones, forming a chevaux de fries. The inner defences are set to the west on the promontory beyond and comprise a rectangular blockhouse set slightly to one side, with a walled enclosure to

its rear. The fort has a coastal setting defined by near vertical drops to the sea on the north, west and south sides. To the east, the setting comprises open low rolling semi-improved grazing land. The wider setting extends from south-east through east to north-east beyond the semi-improved land to the open moorland of the site, including the summits of the Hill of Markamouth and Hill of Vigon, with the post-medieval crofting settlement of Vigon set to the north-east.

- 9.4.10 The coring survey undertaken to inform the 2019 EIA Report recovered wood fragments of willow (*Salix*) from the lower slopes of the Hill of Vigon at a depth of 2 m and alder (*Alnus glutinosa*) from the slopes of the Hill of Markamouth at a depth of 1.8 m. The recovery of these fragments indicates the former existence of woodland in close proximity to Burgi Geos promontory fort, suggesting that the apparent remote and marginal setting of the fort may be a reflection of more recent land use practices and that surrounding vegetation may have been more extensive in the past. The promontory fort at Burgi Geos has associative value derived from its depiction in sketches of Yell by Thomas Irvine (D6/292/24/p172) and also its depiction by social anthropologist and artist Alexa Fitzgibbon which features on the front cover of the Shetland Folk Tales publication (Tulloch 2014).
- 9.4.11 The remote and precipitous coastal setting of the fort contributes to the understanding of the asset as a defensive monument constructed in an isolated location with excellent surveillance opportunities across both sea and land. The hills of the site form part of the wider setting of the fort and their low rolling nature form a contrast to the steep cliffs of the coastal setting in other directions (See Figure 9.5.1b). The setting of the fort thus contributes to an understanding of its cultural value and it is of high sensitivity to changes within its setting.
- 9.4.12 As shown on the appended photomontage (Figure 9.5.1d) 12 of the Proposed Development turbines would be visible from the fort, with four seen to hub height. The arc of view in which turbines would be visible is reduced from 88° for the 2019 layout to 53° for the 2020 layout. The nearest turbine (T5) would be set at a distance of approximately 1.87 km east south-east of the monument (compared with 500m for the 2019 layout) and, along with T6 and T8 would appear as a relatively prominent feature in views inland from the fort. The turbines would be located within an upland moorland setting, beyond the immediately adjacent land which relates to the defensive setting of the fort. The turbines would also be seen beyond the intervening landforms of the Hill of Vigon and the Hill of Markamouth and thus there would be a clear separation between the more fertile flatter land, which may once have been exploited by occupiers of the fort, and the remote upland moorland interior in which the Proposed Development would be located. The landform of the Hill of Vigon and Hill of Markamouth would also block visibility of the proposed access track and borrow pit infrastructure as well as the hubs and towers of all but four turbines.
- 9.4.13 The turbines would be seen offset from the key east to west alignments of stones at the entrance to the fort. Distant views towards the fort from landward approaches to the monument are restricted by intervening landforms of the Hill of Markamouth and Hill of Vigon respectively. However, views to the monument from Vigon to the north would feature oblique views of turbines in the background.
- 9.4.14 An understanding of the Burgi Geos monument as a fortified dwelling is gained from its precipitous coastal location. The steep drop overlooking the coast to the north, west and south is likely the principal factor in the choice of this location, owing to its suitability as a lookout point from where movement along the coast could be monitored. Key views towards the promontory fort are experienced at close distances and depictions of the fort by both Irvine and Fitzgibbon show the view looking west across the promontory and out to sea and thus do not feature land within the site. The Proposed Development would thus represent an alteration to the setting of the monument, but this alteration would not materially affect an observer's ability to understand, appreciate and experience the asset. The turbines would be seen within the wider topographic landscape behind the intervening ridge formed by the Hills of Vigon and Markamouth as shown in Figures 9.5.1b-d. The Proposed Development would not adversely affect the ability to understand the fort's critical relationship with the coast and its landscape setting. The key relationship between the monument and the promontory upon which it is set would not be altered and thus the integrity of the setting would not be adversely affected.

- 9.4.15 The increased distance between the monument and the proposed turbines which would see turbines placed behind a topographic ridge, providing clear separation between the fort and the Proposed Development, as well as the reduced arc of view in which turbines would be visible for the 2020 layout when compared to the 2019 layout would reduce the predicted magnitude of impact to low. The level of residual effect for the 2020 layout would be minor/moderate and not significant.

Decommissioning

- 9.4.16 It is anticipated that direct impacts during the decommissioning phase would be limited and would only occur if new ground works are required beyond the areas disturbed during the original construction works. All operational effects upon the settings of designated assets would be reversed with the removal of the turbines following decommissioning, leading to a neutral residual impact.
- 9.4.17 Detailed assessment of impacts on cultural heritage assets arising from the decommissioning phase have been scoped out of this assessment. A detailed assessment of the cultural heritage impacts of decommissioning the Proposed Development was not undertaken as part of the 2019 EIA Report because: (i) the future baseline conditions (environmental and other developments) cannot be predicted accurately at this stage; (ii) the detailed proposals for decommissioning are not known at this stage, and (iii) the best practice decommissioning guidance methods will likely change during the lifetime of the Proposed Development.

9.5 Additional Mitigation

- 9.1.1 National planning policies and planning guidance as well as the local planning policies require that account is taken of potential effects upon heritage assets/features by proposed developments and that where possible such effects are avoided. Where avoidance is not possible these policies require that any significant effects on assets/features be minimised or offset. There would be no significant direct effects upon known heritage features as a consequence of the Proposed Development.
- 9.5.1 To mitigate the potential for previously unrecorded features to be impacted during the construction phase, an archaeological watching brief will be undertaken on all ground breaking works. The purpose of such works will be to identify any archaeological remains threatened by the Proposed Development, to assess their significance and to mitigate any impact upon them either through avoidance or, if preservation in situ is not warranted, through preservation by record. Depending upon the results of any watching brief works there is the potential that further works, such as excavation and post-excavation analyses, could be required. Details of mitigation will be agreed in consultation with Shetland Amenity Trust through a Written Scheme of Investigation.

9.6 Assessment of Cumulative Effects

- 9.6.1 The cumulative effects identified in the 2019 EIA Report arose largely from the combined views of the Proposed Development with operational, consented and within-planning wind farm developments at distances up to 35 km from the Proposed Development. There would be no change in the level of cumulative effect identified as a consequence of the 2020 layout.

9.7 Comparison of Effects

- 9.7.1 The removal of T1, T2, T3, T4, T7 and T29 and the reduction in height of T5, T16, T19, T20, T24, T25, T26, T27 and T28 for the 2020 layout would result in a reduction in total numbers and proportions of turbines visible from heritage assets across the 10 km study area. A re-assessment of the residual effects of the Proposed Development upon the receptors identified in the 2019 EIA Report has been undertaken. The removal of turbines in the west of the site would reduce the impact on the setting of the Burgi Geos (Site 1) to the extent that it would no longer be considered significant in EIA terms. The Scheduled Monument known as Tur Ness, prehistoric houses and Norse settlement (Site 32) would not be in the ZTV for the 2020 layout and thus the predicted level effect on the setting of this monument has reduced from Marginal to None. All other predicted effects remain at the same level

as reported in the 2019 EIA Report. A summary comparing the effects of the 2019 layout and 2020 layout is presented in Table 9.1 below.

Table 9.1 – Summary of Effects

Description of Effect	2019 Effects		2020 Effects	
	Significance	Beneficial/ Adverse	Significance	Beneficial/ Adverse
Partial damage to former road from Heatherdale to Cullivoe (Site 148)	Negligible	Adverse	Negligible	Adverse
Damage to hitherto unknown archaeological remains	Negligible	Adverse	Negligible	Adverse
Effect on setting of Burgi Geos, promontory fort (Site 1)	Moderate	Adverse	Minor/moderate	Adverse
Effect on settings of Sites 2, 4, 7, 21, 28, 39, 40, 41, 61, 66, 67, 68, 75, 8 and 81	Minor /Moderate	Adverse	Minor /Moderate	Adverse
Effect on settings of Sites 3, 5, 10, 12-15, 17, 18, 27, 29, 37, 39, 42, 45, 46, 48, 49, 52	Minor	Adverse	Minor	Adverse
Effect on settings of Sites 9, 19, 20, 31, 36, 43, 47, 54-58, 70 and 74	Negligible	Adverse	Negligible	Adverse
Effect on settings of Site 32	Negligible	Adverse	None	N/A

Table 9.2 – Summary of Cumulative Effects

Receptor	Effect	Cumulative Developments	Previous Cumulative Effect		New Cumulative Effect	
			Significance	Beneficial/ Adverse	Significance	Beneficial/ Adverse
Buried archaeological remains	Damage to buried remains and associated deposits	Garth Wind Farm, Beaw Field Wind Farm.	Negligible	Adverse	Negligible	Adverse
Cumulative Effect on Sites 4, 7, 8, 21, 28, 40	Changes to setting	Garth Wind Farm, Beaw Field Wind Farm.	Minor/Moderate	Adverse	Minor/Moderate	Adverse
Cumulative Effect on Sites 2, 39 and 41	Changes to setting	Garth Wind Farm, Beaw Field Wind Farm.	Minor	Adverse	Minor	Adverse
Cumulative Effect on Sites 80 and 81	Changes to setting	Garth Wind Farm, Beaw Field Wind Farm.	Negligible	Adverse	Negligible	Adverse

9.8 References

Historic Environment Scotland (2016). *Managing Change in the Historic Environment: Setting*. Available at: <https://www.historicenvironment.scot/media/2359/setting-2.pdf>.

Historic Environment Scotland (2019a). *Historic Environment Policy for Scotland*. Available at: <https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>.

Historic Environment Scotland (2019b) Consultation Response Case ID 3000024962. Email correspondence to Energy Consents Unit: 08 August 2019

Historic Environment Scotland (2019c). Designation Policy and Selection Guidance. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=8d8bbaeb-ce5a-46c1-a558-aa2500ff7d3b>

Historic Environment Scotland (2019c) Energy Isles Wind Farm, Yell, Shetland Islands (Revised Layout) Case ID 3000024962. Email correspondence: 21 October 2019

Tulloch, L (2014) *Shetland Folk Tales*, the History Press, Gloucestershire

Turner. V.E (2019) *Energy Isles Windfarm, south of Gloup, Yell, Shetland*. Email correspondence to Energy Consents Unit: 17 May 2019.