

# Chapter 11: Cultural Heritage

Creag Riabhach Wind Farm Extension

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## 11 Cultural Heritage

### 11.1 Introduction

This chapter considers the Cultural Heritage element of the Environmental Impact Assessment (EIA) for Creag Riabhach Wind Farm Extension (hereafter 'the proposed development'). The assessment has been undertaken by Lynne McKeeggie of Highland Archaeology Services Ltd. It will set out the results of baseline survey and Scoping Responses from relevant consultees.

A heritage asset (or historic asset) is any element of the historic environment which has cultural significance. This may include extant or buried remains, as well as areas of landscape defined by a specific historic event, process or theme.

Cultural Heritage includes archaeological and historical assets of various designations, including:

- World Heritage Sites;
- Inventory Gardens and Designed Landscapes;
- Inventory Historic Battlefields;
- Scheduled Monuments;
- Listed Buildings;
- Historic Marine Protected areas or wrecks;
- Conservation Areas; and
- Other non-designated historic environment assets.

Through the baseline survey of both designated and undesignated heritage assets and subsequent liaison with relevant consultees, it has been confirmed that no adverse impacts upon cultural heritage assets are anticipated to result from the proposed development. Assessment of impacts for both designated and undesignated heritage assets were, therefore, scoped out of this EIA Report.

### 11.2 Legislation, Policy and Guidance

The assessment has been undertaken with reference to relevant legislation, policy and guidance related to cultural heritage.

#### 11.2.1 Legislation

Scheduled Monuments and Listed Buildings are protected by statute. Legislation regarding Scheduled Monuments is contained within The Ancient Monuments and Archaeological Areas Act 1979<sup>1</sup>. Legislation regarding Listed Buildings is contained in The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997<sup>2</sup>.

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<sup>1</sup> Ancient Monuments and Archaeological Areas Act (1979).

<sup>2</sup> Planning (Listed Buildings and Conservation Areas) (Scotland) Act (1997).

The Historic Environment Scotland Act 2014 defines the role of Historic Environment Scotland (HES), and the processes for the designation of heritage assets, consents and rights of appeal<sup>3</sup>.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 sets out the processes in which an EIA may be submitted by a developer.

### 11.2.2 Policy

The Scottish Government's planning policies in relation to the historic environment are set out in policy 7 of the National Planning Framework 4 (NPF4). This sets out the principles of promoting the enhancement and protection of designated and non-designated assets, enabling positive change and the preservation of historic assets in situ, wherever possible.

Planning Advice Note (PAN) 1/2013<sup>4</sup> lays out the key principles of EIA. Planning Advice Note (PAN) 2/2011 'Planning and Archaeology'<sup>5</sup> provides technical advice to planning authorities and developers on dealing with archaeological remains.

### 11.2.3 Guidance

HES provides guidance on how to apply the policies above in a series of documents entitled 'Managing Change in the Historic Environment'. Also, their Environmental Impact Assessment Handbook 2018 (Historic Environment Scotland and Scottish Natural Heritage) provides detailed guidance on the principles and preparation methods for EIAs.

Standards and Guidance published by the Chartered Institute for Archaeologists (CifA) have been followed in preparing the baseline assessment, in particular the 'Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment' (2014)<sup>6</sup> and the 'Standard and guidance for historic environment desk-based assessment' (2014)<sup>7</sup>.

## 11.3 Previous Assessments

An Environmental Statement Chapter was prepared by John Wood of Highland Archaeology Services as part of the planning application for the consented and operational Creag Riabhach Windfarm in 2013<sup>8</sup>. The document considered heritage assets within the Zone of Theoretical Visibility (ZTV) up to a distance of 20km for designated assets, and 5km for non-designated assets. It identified 56 sites of potential heritage interest

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<sup>3</sup> Historic Environment Scotland Act (2014).

<sup>4</sup> Planning Advice Note (PAN) 1/2013

<sup>5</sup> Planning Advice Note (PAN) 2/2011

<sup>6</sup> CifA S&G Commissioning

<sup>7</sup> CifA S&G DBA

<sup>8</sup> Wood, J. (2013)

within the ZTV, of which 23 were Scheduled Monuments and five were Listed Buildings. None of these assets were assessed as subject to large or medium effects and no mitigation was recommended.

Following advice from Highland Council Historic Environment Team (THC:HET) a walkover survey was not deemed necessary for this assessment.

Following this assessment, Creag Riabhach Wind Farm was granted Section 36 consent with deemed Planning Permission under Section 57 (2) of the Town and Country Planning (Scotland) Act 1997 on 17 October 2016, for the erection of 22 turbines and associated infrastructure at Craig Riabhach, Sutherland.

## 11.4 Baseline Survey

A baseline survey was undertaken by Highland Archaeology Services in 2022, in order to identify any additional assets that may be affected by the extension of Creag Riabhach Wind Farm.

A study was made of the Historic Environment Record and Canmore, to ascertain if new additional archaeological discoveries had been made within 2km of the study area since the creation of the Environmental Statement for the Wind Farm in 2013. This was deemed adequate as the addition of this limited number of turbines is unlikely to significantly alter the affects to assets beyond this distance. Other heritage records, such as available mapping and Statistical Accounts, have not released new records for this area since the 2013 study.

It was found that no additional designated archaeological assets have been added to the Historic Environment Record or Canmore within 2km of the study area since the creation of the Environmental Statement (ES) in 2013.

The only additional undesignated asset record within 2km of the proposed development was an arbitrary location indicating a broad find location for artefacts within the National Museum of Scotland's catalogue. As such these are considered unlikely to increase the potential for archaeological remains to survive within the development area.

A site visit was also undertaken in accordance with updated guidance from ClfA in order to assess the potential for unrecorded heritage assets to survive within the site.

The walkover survey identified and recorded the possible remains of a Post-Medieval or Modern quarry, located on the western periphery of the proposed development area. The site measured 8m in length, with a width of 4m. It is deemed to be of low heritage value, as it is a relatively common modern feature that is not associated with any other features of significance.

No other heritage assets were identified within the site, and the potential for survival of unrecorded assets to survive in this area was deemed to be low, due to the lack of other sites recorded within the local area, the historic land use of the site and the topographic characteristics of the area.

## 11.5 Consultation

Both Historic Environment Scotland (HES) and The Highland Council's Historic Environment Team (THC:HET) were included as Consultees.

Liaison with HES commenced in February 2022 with provision of the baseline assessment and 2013 ES Chapter. Additional ZTV and wireframe images were then provided on 23 March 2022. This included wireframe images from near Ben Klibreck campsite (SM10795), and Gunmore Broch (SM1866) and Township (SM2209).

HES then provided pre-application advice on 28 April 2022 stating that they were content that the proposals are *“unlikely to give rise to significant impacts on the setting of heritage assets in our remit”* and that *“We are therefore content for heritage assets in our remit to be scoped out of any Environmental Impact Assessment (EIA) to be undertaken in support of the proposals.”* As a result of this consultation designated assets have been scoped out of this EIA chapter.

Liaison with THC:HET commenced in February 2022 when they were provided with the baseline assessment and 2013 ES chapter. A Scoping Response from THC was received in July 2022, in which THC:HET confirmed that *“it is content that the information presented in the scoping report is adequate and confirm agreement that cultural heritage can be scoped out of the EIA.”*

In accordance with these scoping responses no further assessment has been undertaken for designated or undesignated cultural heritage and no mitigation is proposed.

## 11.6 References

CIfA Standards and Guidance for Commissioning (2014) accessed at:

[https://www.archaeologists.net/sites/default/files/CIfAS&GCommissioning\\_1.pdf](https://www.archaeologists.net/sites/default/files/CIfAS&GCommissioning_1.pdf)

CIfA Standards and Guidance for Desk Based Assessment (2014) accessed at:

[https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA\\_4.pdf](https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA_4.pdf)

National Planning Framework 4 (NPF4) accessed at: <https://www.gov.scot/publications/national-planning-framework-4/>

Planning Advice Note (PAN) 1/2013 accessed at: <https://www.gov.scot/publications/planning-advice-note-1-2013-environmental-impact-assessment/>

Planning Advice Note 2/2011: 'Planning and archaeology' accessed at:

<https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>

Wood, J. (2013), 'Section 9d: Cultural Heritage & Archaeology' by Highland Archaeology Services, within *Creag Riabhach Wind Farm Volume 1, Environmental Statement*, Pegasus Group, grey literature