



Technical Appendix

Drummarnock Wind Farm

Technical Appendix 10-2: NPF4 Addendum

Drummarnock Wind Farm Limited

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1 Introduction

This document is intended to be read in conjunction with:

- Chapter 10 – Cultural Heritage (Volume 2 EIA Text);
- Figures 10-1 to 10-9 (Volume 4 Figures); and
- Technical Appendix 10-1 Historic Environment Assessment (Volume 3 Technical Appendices).

The Proposed Development would consist of four wind turbines each with a tip height of up to 180m above ground level (agl), plus ancillary infrastructure.

This document provides additional expert analysis of the EIA findings and interprets its outcomes for the four designated heritage assets identified as experiencing likely effects, with regard to the relevant provisions of National Planning Framework 4.

This is necessary to furnish the reader with the appropriate understanding of the technical details in light of the policy requirements, which could be argued to be beyond the competence of the EIA Report and associated appendices.

It has been prepared by David Bull, Principle Historic Environment Consultant of LUC – lead author for the Cultural Heritage component of the EIA, and Steven Orr, Director of Historic Environment and Planning of LUC – the Project Director for the Cultural Heritage component of the EIA.

2 Policy, Guidance and Recent Decisions

2.1 Background

National Planning Framework 4 (NPF4) (Scottish Government 2021) was adopted by Scottish Ministers in February 2023.

In addition to setting the national spatial strategy for Scotland for the coming two decades, it establishes national planning policy for the purposes of development management. It forms part of the statutory development plan for Scotland's planning authorities and is a material consideration in planning decisions.

Consequently, it sets the national framework for managing the historic environment through the planning process. In some respects, it represents a continuation of the preceding Scottish Planning Policy (SPP 2014; Scottish Government 2014) approach to heritage assets, but with some notable changes relevant to the Proposed Development.

In managing the potential effects of development on scheduled monuments, SPP paragraph 145 introduced the concept of; "...the integrity of...setting".

This is unsupported in statute or accepted historic environment conservation and impact assessment practice. It was not a concept applied to any other designated heritage asset, and as a requirement of planning policy, stands somewhat apart from EIA and Historic Environment Scotland (HES) guidance.

2.2 NPF4 Policy 7

NPF4 Policy 7, part (h) states:

"Development proposals affecting scheduled monuments will only be supported where:

- i. direct impacts on the scheduled monument are avoided;*
- ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or*
- iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised."*

For the purposes of the Proposed Development, the first limb of the policy is fulfilled in the sense that direct, physical impacts on scheduled monuments have not been identified, given that there are no scheduled monuments within the Proposed Development Site.

It is the second limb of the policy, concerning whether 'significant adverse impacts on the integrity' of the setting of scheduled monuments are likely to occur that is the object of discussion in this paper.

As is demonstrated below, the third limb of the policy, which requires the demonstration of 'exceptional circumstances' in the event that either direct impacts on scheduled monuments or significant adverse impacts on the integrity of their setting cannot be avoided, is not engaged and therefore is not discussed further.

2.3 Relevant Guidance

HES' 'Managing Change in the Historic Environment: Setting' guidance, published in 2016 and updated in 2020 (HES 2020), provides advice to practitioners and decision makers on understanding what constitutes the setting of a heritage asset, how to assess changes within that setting, and consequent effects on the cultural significance of the asset.

As noted above, it makes no reference to the concept of 'integrity' of the setting of assets, and therefore provides no assistance in defining or applying the concept in impact assessment.

However, it helpfully establishes HES' view that "setting is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced".

While the guidance is perhaps less clear than ideal on the accepted understanding that setting is inextricably linked to the cultural significance of heritage assets and does not exist as a separate entity or receptor of impacts, this is tacitly acknowledged throughout the document.

Professional guidance, developed in partnership by the Institute of Environmental Management and Assessment (IEMA), the Institute of Historic Building Conservation (IHBC), and the Chartered Institute for Archaeologists (CIfA) (IEMA, IHBC & CIfA 2021), established a common framework for assessing impacts on the historic environment.

It usefully restates the primacy of cultural significance in managing change to heritage assets (paragraph A.1), rather than artificially treating setting as a separate – or at least partially separate – consideration, as NPF4 appears to lean toward.

2.4 Recent Decisions

The Rigg Hill Wind Farm appeal (PPA-310-2034), in agreed matters between HES and the Appellant, established a useful working definition of 'integrity of setting' for the purposes of the Inquiry:

"Changes to factors of setting that contribute to cultural significance such that the understanding, appreciation and experience of an asset are not adequately retained will affect the integrity of setting."

This builds on views expressed by Reporters in earlier decisions, such as Creggan (WIN-130-1), Birneyknowe (WIN-140-7) and Corlic Hill (PPA-280-2022).

However, the Rigg Hill case focused on the test set by SPP paragraph 145, which established a presumption against development that would have any; "adverse effect on a scheduled monument or on the integrity of its setting".

The NPF4 policy wording sets the bar higher, supporting development only where "significant adverse impacts on the integrity of the setting...are avoided".

However, in their objection to Lethen Wind Farm (ECU00002221) on grounds of significant adverse impact on the setting of Lochindorb Castle scheduled monument, HES' stated position was that the level of policy protection afforded to the setting of scheduled monuments by policy 7(h) of NPF4, is the same as that previously afforded by SPP paragraph 145.

In that; “...where there is potential for a proposed development to have an adverse effect on the integrity of a scheduled monument's setting, permission should only be granted where there are exceptional circumstances.”

The Scottish Government agreed with HES' objection on the basis that the Lethen Wind Farm development would have significant adverse impacts on the integrity of the setting of Lochindorb Castle. However, it should be noted that the decision did not directly confirm that the level of protection afforded by SPP and NPF4 was the same as this was unnecessary due to the significant adverse effects identified.

2.5 Adopted Definition of 'Integrity of Setting'

As the best available definition that can be afforded meaningful weight, the Rigg Hill wording is therefore adopted in relation to the assessment for the Proposed Development. Close reading of the text, coupled with the NPF4 stipulation of avoidance of 'significant adverse effects on the integrity of...setting', establishes the following:

- 'Integrity of setting' depends on the retention of the ability to understand, appreciate and experience the factors of an asset's setting that contribute to its cultural significance.
Adequate retention' in this context would be the avoidance of significant impacts on the integrity of setting (i.e. the ability to understand, appreciate and experience the contribution of setting to the cultural significance of the asset).
It is therefore critical that all assessments and assertions are tied back to cultural significance, and do not stray into wider matters of visual amenity or other effects;
- The principal objective is conservation ('adequate retention') of the setting relationships that contribute to cultural significance (e.g. visual, spatial, symbolic) of the asset;
- The 'Integrity bar' is not breached if the ability to understand, appreciate and experience the factors of setting contributing to cultural significance are not significantly impacted.
Change in both setting and its level of integrity are therefore permitted, but they cannot constitute significant adverse impacts; and
- In order to make judgements on changes to the integrity of the setting of a scheduled monument, a similar judgement on the status quo is necessary to provide a baseline.

It should be noted that a significant impact on the 'integrity of setting' under this definition does not automatically equate to a 'significant effect' for the purposes of EIA.

The latter weighs all elements of change to the cultural significance of assets in the round, in line with established methods. It could reasonably be assumed that for a 'significant impact on integrity' to occur, the contribution that setting makes to the cultural significance of an asset would need to be significantly impacted in its own right thereby setting a higher bar.

2.6 Method for determining impacts on integrity of setting

To assess the level of impact on the integrity of setting, it is necessary to establish the following:

1. Contribution of setting to cultural significance and the ability to understand, appreciate and experience those factors of setting;
2. Baseline level of 'integrity' of setting (i.e. what currently detracts from contribution of setting to cultural significance), against which change can be assessed;
3. Level of change to contribution of setting to cultural significance arising from the Proposed Development;
4. Level of change in the ability to understand, appreciate and experience those factors contributing to cultural significance; and
5. Judgement on whether integrity of setting is in receipt of 'significant adverse impacts'.

While the majority of this information is provided and can readily be gleaned from the EIA Report, the following sections of this document are intended to provide clarity on policy alignment and support decision making.

3 Impacts on integrity of setting

This section sets out the anticipated level of impact on the integrity of the setting of scheduled monuments with the potential to be affected by the Proposed Development. These comprise:

- King's Yett cairn (SM2580);
- Dundaff Hill, mound (SM6553);
- Dundaff Hill, enclosure (SM7131); and
- Stirling Castle (SM90291).

It applies the outline methodology set out in the previous section, taking the findings of Chapter 10 of the EIA Report and Appendix 10-1: Historic Environment Assessment together with the associated visualisations as its source material. It provides no additional assessment or assertions, but instead repackages existing information to better elucidate the policy position particularly in relation to the applicable policies of NPF4.

The remainder of this section is structured by asset. Necessarily, only relevant scheduled monuments are considered, as the 'integrity test' does not apply to designated assets more generally.

As prehistoric funerary and ritual monuments, King's Yett cairn (SM2580), Dundaff Hill, mound (SM6553) and Dundaff Hill, enclosure (SM7131) are assets with an indivisible relationship with their surroundings on a functional, spatial and symbolic level.

While there is much that is necessarily conjectural in the interpretation of the role and importance of setting relationships, there is sufficient commonality across these types of assets to make relatively secure assertions.

Similarly, Stirling Castle (SM90291) has a strong functional and spatial relationship with its surroundings over which it projects authority and status.

3.1 King's Yett Cairn (SM2580)

3.1.1 Contribution of setting to cultural significance

The key elements of the asset's setting that contribute to its cultural significance, and the ability to understand, appreciate and experience them, comprise:

- Its position on a wide terrace in heather moorland offering limited visibility of both it and the assumed ritual activity that accompanied its construction and use.
 - Understanding: the presence of commercial forest to its southwest, west, northwest, north and northeast distracts from reading the topography in these directions.
 - Appreciation: the views to the northeast and east are most prominent on the ground, with Lewis Hill and the Forth floodplain in the distance forming a key focal point. The commercial forest, minor road and frequently used public car park, and recreational forestry path reduce the appreciation of the remoteness of the asset and obscures how it may have been approached in the past.

- Experience: the strongest experience is from the recreational forestry path and the asset itself, where the edge of the terrace accentuates distanced views east/northeast.
- Intervisibility with Dundaff Hill and open moorland to the south.
 - Understanding: coniferous trees currently forming a windbreak to the southeast of the minor road, overhead utilities on wooden poles and wind turbines forming part of the existing Craigengelt Hill Wind Farm can all be seen breaking the skyline from the cairn. These distract from reading the topography in these directions and any visual relationship with Dundaff Hill.
 - Appreciation: modern infrastructure reduces the appreciation of any intended relationship with Dundaff Hill and obscures how it may have been approached in the past.
 - Experience: the strongest experience is from the asset itself, to which views to the southwest do not contribute.
- Spiritual/spatial relationships with the King's Yett Burn.
 - Understanding: relationship and putative deliberate placement of the asset adjacent to the watercourse is readily understood from and adjacent to the asset.
 - Appreciation: best appreciated in views in-combination with the asset from the recreational forestry path to its west/southwest.
 - Experience: sense of connection between the asset and this landscape feature.

3.1.2 Baseline level of integrity

The asset's setting is that of heather moorland with extensive areas of rotational commercial forest to the west, west, northwest, north and northeast, and enclosed semi-improved moorland to the east.

A purpose-built wide pedestrian gravel path has been inserted 30m to the west of the asset, enables recreational access to the coniferous forestry. The path begins at a small, frequently used car park approximately 170m south of the asset. A small watercourse called the King's Yett Burn aligned approximately north-west and south-east, flows past the cairn c. 30m to the north.

There is very limited intervisibility with Dundaff Hill, which is just apparent on the skyline some 4.8km to the south. The intervening rising landform suggests that the King's Yett cairn was not positioned to exploit views between it and Dundaff Hill, or that of Dundaff Hill, Mound (SM6553).

Given the distance between the two assets (nearly 5km), the low-lying position of the King's Yett cairn, the scale of the visible (above-ground) physical remains of Dundaff Hill, Mound, these and the resulting lack of perceptibility, these putatively contemporary assets do not share any further relationship beyond their obvious spatial relationship.

The hubs and blades of the existing Craigengelt Wind Farm are visible from the asset above hills to the south. There is some in-combination intervisibility with the Proposed Development from the north, as well as the existing Craigengelt Wind Farm.

The asset's setting therefore has a medium level of relative integrity. While the issues identified do detract from the current experience of the asset, its key relationships remain broadly intact and legible.

3.1.3 Impacts of change

Change to cultural significance

The contribution that setting makes to the cultural significance of the King's Yett Cairn will not be altered by the introduction of the Proposed Development. The elements of setting that are fundamental to supplementing the understanding and importance of the physical fabric, archaeological value, and the spatial, symbolic and functional relationships of the asset will remain intact.

The ability to see turbines from and in-combination with the asset will not materially alter the ability to understand or appreciate these relationships. As indicated below, it is the experience of these factors that will necessarily be altered by the introduction of the Proposed Development.

Change to integrity of setting

The Proposed Development will result in the following physical changes in the landscape:

- Presence of turbines approximately 1.7 km to the south within the context of the existing Craigengelt Wind Farm.
 - The turbines would be located outside of the local topography. While turbines break the skyline, they all read very clearly as sitting outside the landscape unit.
 - Turbines would be a prominent feature in views of the cairn to the south, but would be seen in the context of the existing wind farm, which already forms part of the current setting of the asset.
 - Turbines, by their nature, introduce additional movement and noise to the landscape which already features turbines, a minor road, frequently used car park and passing walkers.
- Creation of expanded/reinforced access network to facilitate construction and operation of the Proposed Development.
 - Not visible from the cairn or its immediate environs.

Table 3-1: Impacts on integrity/factors of setting

Factor of setting (summary)	Understanding	Appreciation	Experience
Its topographical position; local visibility	Relationships remain extant, level of prominence will not change, and location will still convey the nature of the site.	Topography unchanged and readily appreciable.	Presence of prominent turbines in the southern periphery of views distract from the open views north-east and east. Small change
Intervisibility with Dundaff Hill and open moorland to the south	Unchanged.	Appreciation of topography and siting of asset unchanged.	Presence of further turbines a distraction, but no meaningful impact on experience. Small change
Open views towards Lewis Hill and the Forth valley.	Relationships remain extant, as the extent of views will not be altered.	Appreciation of the contents and distance nature of northeast and	Presence of additional turbines in the southern periphery of views may distract from the open

Factor of setting (summary)	Understanding	Appreciation	Experience
		east views will be unchanged.	views. Small change
Spiritual/spatial relationships with the King's Yett Burn.	Unchanged	Unchanged. Relevant views focused away from the Proposed Development	Views towards the burn from the asset and in-combination with the asset will not include turbines when approached from the recreational forestry path from the south and so will not diminish the experience of the careful positioning in the landscape. Only after this experience is had, does it become possible to experience the burn and asset in-combination with views towards turbines. The presence of additional turbines is a distraction, but no meaningful impact on experience of spatial relationships. Negligible change

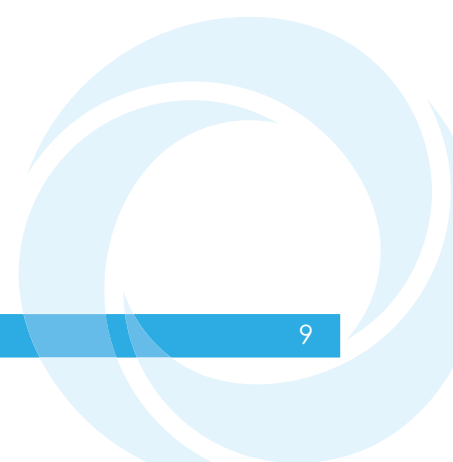
3.1.4 Judgement on 'integrity test'

As Table 3-1 above illustrates, it is only the experience of the factors of setting of the King's Yett cairn that will be impacted by the Proposed Development.

While the presence of additional turbines in the setting of the asset further interrupts the relationship with the moorland to the south and Dundaff Hill, the visitor will retain the ability to understand and appreciate all of the key relationships of the asset.

Changes to the experience of these 'factors of setting' will be adversely affected, but generally to a small extent. The key area of change is the addition of new turbines to the south.

Viewed in the context of the other changes and the lack of effects to the cultural significance of the asset, and the ability to understand and appreciate that significance, this is judged to constitute an adverse, but **not significant**, impact on the integrity of the asset's setting.



3.2 Dundaff Hill, mound (SM6553)

3.2.1 Contribution of setting to cultural significance

As set out in the Appendix 10-1 and Chapter 10 of the EIA Report, the key elements of the asset's setting that contribute to its cultural significance, and the ability to understand, appreciate and experience them, comprise:

- Its topography which enables open views to the north but poor visibility of it when viewed from the south.
 - Understanding: the presence of surrounding commercial forest distracts from reading the topography.
 - Appreciation: The commercial forest distracts from the appreciation of otherwise open views north towards Craigengelt Hill and the gently rolling landform of Touchadam Muir and the Touch Hills.
 - Experience: strongest experience is from approximately 150m northwest of the asset where a clearing in the forestry allows the steepness of the hill and how it contrasts to the surrounding landscape to be experienced.
- Open views over Craigengelt Hill, Touchadam Muir and the Touch Hills.
 - Understanding: the presence of surrounding commercial forest slightly distracts from understanding of the intended views from the asset.
 - Appreciation: best appreciated from the asset itself.
 - Experience: strong sense of connection to the landscape to the north.

3.2.2 Baseline level of integrity

The asset's setting is, at present, largely rotational commercial forest on all sides of its low north-facing ridge. The asset's setting also includes the existing Craigengelt Hill Wind Farm, the nearest turbine of which is approximately 1.6km to the northwest.

While turbines belonging to this wind farm are prominent in views to the northwest from the asset on Craigengelt ridge, the distinct landscape form (Craigengelt Hill, Touchadam Muir and the Touch Hills) remain well-defined, recognisable and easily readable in the landscape.

There is a clear line of sight between the mound and the King's Yett cairn (SM2580). However, the King's Yett cairn itself is not discernible in views from Dundaff Hill mound due to:

- The distance between the two assets (c. 4.3km);
- The low-lying position of the King's Yett cairn, combined with the scale of the visible; (aboveground) physical remains of the cairn;
- The colour palette of the vegetation covering and surround it; and
- Its current coniferous forest backdrop.

The asset's setting therefore has a medium level of relative integrity. The issues identified detract from the current experience of the asset and its key relationships.

3.2.3 Impacts of change

Change to cultural significance

The contribution that setting makes to the cultural significance of the Dundaff Hill mound will not be altered by the introduction of the Proposed Development. The elements of setting that are fundamental to supplementing the understanding and importance of the physical fabric, archaeological value, and the spatial, symbolic and functional relationships of the asset will remain intact.

The ability to see additional turbines from and in-combination with the asset will not materially alter the ability to understand or appreciate these relationships. As indicated below, it is the experience of these factors that will necessarily be altered by the presence of the Proposed Development.

Change to integrity of setting

The Proposed Development will result in the following physical changes in the landscape:

- Presence of turbines approximately 2.1km to the north within the context of the existing Craigengelt Wind Farm.
 - Turbines located above the skyline.
 - Turbines would be a prominent feature in views from the cairn to the northwest, north, and northeast.
 - Turbines, by their nature, introduce additional movement to the landscape.
- Creation of expanded/reinforced access network to facilitate construction and operation of the Proposed Development.
 - May be visible from the mound or its immediate environs.

Table 3-2: Impacts on integrity/factors of setting

Factor of setting (summary)	Understanding	Appreciation	Experience
Its topographical position;	Unchanged	Legibility of the topography will remain unchanged.	Presence of additional turbines in views to the north may distract from the open views. Small change
Open views over Craigengelt Hill, Touchadam Muir and the Touch Hills	Unchanged	Legibility of open views will remain unchanged.	Introduction of further turbines into views from Dundaff Hill and the asset. Small change

3.2.4 Judgement on 'integrity test'

As Table 3-2 above illustrates, it is only the experience of the factors of setting of the Dundaff Hill mound that will be impacted by the Proposed Development.

While the presence of additional turbines in the setting of the asset is a further interruption to the relationship with Craigengelt Hill, Touchadam Muir and the Touch Hills

to the north, the visitor will retain the ability to understand and appreciate all of the key relationships of the asset.

Changes to the experience of these 'factors of setting' will be adversely affected, but generally to a small extent.

The key area of change is the addition of new turbines to the north. Viewed in the context of the other changes and the lack of effects to the cultural significance of the asset, and the ability to understand and appreciate that significance, this is judged to constitute an adverse, but **not significant**, impact on the integrity of the asset's setting.

3.3 Dundaff Hill, enclosure (SM7131)

3.3.1 Contribution of setting to cultural significance

As set out in the Appendix 10-1 and Chapter 10 of the EIA Report, the key elements of the asset's setting that contribute to its cultural significance, and the ability to understand, appreciate and experience them, comprise:

- Its topography which enables views to the south and southeast.
 - Understanding: readily accessible and intelligible with no meaningful distractions.
 - Appreciation: the views to the south and southeast create a sense of openness, reinforcing the sense of place, that this was an asset with distant ties to other parts of the landscape, such the Carron Valley and Kilsyth Hills.
 - Experience: strongest experience is from the vicinity of the asset itself, where the topography of the utilised portion of hill can be best appreciated.
- Sense of anticipation and surprise / reveal for visitors accessing the asset from the southeast and/or the northwest, before gaining access to the ridge on which the asset is located.
 - Understanding: the supposed means of accessing the asset (from the northwest over Dundaff Hill, or southeast uphill), although inevitably altered from its original state, remains intact and the drama of the asset's sudden reveal is extant.
 - Appreciation: the process of moving through the landscape, following natural features to reach an important prehistoric funerary and ritual monument can readily be appreciated.
 - Experience: the much-reduced scale of the asset, field boundaries and commercial forest to the north, distracts from what would have been a sense of awe and its apparent incongruity in a 'natural' landscape.
- Open views over the Carron valley and towards the Kilsyth Hills
 - Understanding: relationship and deliberate placement of asset readily understood from and adjacent to the asset.
 - Appreciation: best appreciated from and adjacent to the asset, and in views in-combination with the asset from the northwest.
 - Experience: strong sense of connection to the landscape to the south and southeast.

3.3.2 Baseline level of integrity

The asset's setting is, at present, largely enclosed rough pasture defined by dry-stone walls approximately 300m to the south-southeast of the summit of Dundaff Hill. The asset's setting also includes the existing Craigengelt Hill Wind Farm, the nearest turbine of which is approximately 1.6km to the northwest.

While turbines belonging to this wind farm are present to the northwest from the asset on Craigengelt ridge, they are beyond the commercial forest and in a distinctly different landscape unit. The distinct landscape form to the south and southeast (Carron Valley and Kilsyth Hills) remain unchanged.

There is some in-combination intervisibility with the Proposed Development to the north, as well as the existing Craigengelt Wind Farm.

The asset's setting therefore has a medium to high level of relative integrity. While the issues identified do detract from the current experience of the asset, all its key relationships remain broadly intact and legible.

3.3.3 Impacts of change

Change to cultural significance

The contribution that setting makes to the cultural significance of the Dundaff Hill, enclosure will not be altered by the introduction of the Proposed Development.

The elements of setting that are fundamental to supplementing the understanding and importance of the physical fabric, archaeological value, and the spatial, symbolic and functional relationships of the asset will remain intact.

The ability to see turbines from and in-combination with the asset when approaching uphill from the southeast will not materially alter the ability to understand or appreciate these relationships. As indicated below, it is the experience of these factors that will necessarily be altered by the introduction of the Proposed Development.

Change to integrity of setting

The Proposed Development will result in the following physical changes in the landscape:

- Presence of turbines approximately 2.6km to the north within the context of the existing Craigengelt Wind Farm.
 - Turbines located above the skyline above commercial forest, but evidently beyond Dundaff Hill.
 - Turbines would not be a prominent feature in views to the north of the enclosure and seen in-combination with existing turbines.
 - Turbines will not feature in contextual views of the enclosure from other location on Dundaff Hill, including when approaching from the northwest.
 - Turbines, by their nature, introduce additional movement to the landscape.
- Creation of expanded/reinforced access network to facilitate construction and operation of the Proposed Development.
 - Not visible from the cairn or its immediate environs.

Table 3-3: Impacts on integrity/factors of setting

Factor of setting (summary)	Understanding	Appreciation	Experience
Its topography which creates the views to the south and southeast.	Unchanged	Sense of openness within the confines of modern field boundaries will remain legible through an intact skyline to the south and southeast.	Views towards and from the asset from the north and northwest on Dundaff Hill will not include turbines, and so will not diminish the experience of the careful positioning in the landscape. Small change
Scale and form of the asset does not become apparent until in close proximity.	Unchanged	Ability to appreciate the sequential relationships of the asset, and its location remain unchanged.	'Reveal' view when approaching from the northwest will not include turbines, and so will not diminish the experience of the careful positioning in the landscape. Turbines will be seen in the 'reveal' when approaching uphill from the southeast, however by this point the asset is the main focus. Small change
Open views over the Carron Valley and towards the Kilsyth Hills	Unchanged	Unchanged. Relevant views focused away from the Proposed Development	Presence of turbines above the intervening Dundaff Hill in the far northern periphery of views may distract from the open views. Small Change

3.3.4 Judgement on 'integrity test'

As Table 3-3 above illustrates, it is only the experience of the factors of setting of the asset that will be impacted by the Proposed Development. While additional turbines will be present in the setting of the asset, the visitor will retain the ability to understand and appreciate all of the key relationships of the enclosure.

Changes to the experience of these 'factors of setting' will be adversely affected, but generally to a small extent.

The key area of change is the addition of new turbines to the north. Viewed in the context of the other changes and the lack of effects to the cultural significance of the asset, and the ability to understand and appreciate that significance, this is judged to constitute an adverse, but **not significant**, impact on the integrity of the asset's setting.

3.4 Stirling Castle (SM90291)

3.4.1 Contribution of setting to cultural significance

Stirling Castle is an outstanding example of a medieval royal castle with later alterations and additions, as well as one of the most important royal sites of medieval and early modern Scotland.

The asset occupies a volcanic outcrop commanding the upper Forth valley and comprises three main enclosures: the outer defences on the main line of approach, including the esplanade; the main enclosure at the summit of the rock, encircled by a curtain wall and including the Inner and Outer Closes; and the Nether Bailey to the north.

The principal buildings for royal occupation form a square known as the Inner Close enclosed by the King's Old Building, the Great Hall, the Chapel Royal and the Royal Palace.

Setting makes an important contribution to the cultural significance of this asset. It enables an understanding of the site selection decisions that informed the location of the asset – on a solid area of high ground overlooking lower land which it sought to project power and authority over the resources of the Forth as well as movement through the vital route up the Forth valley and the crossing of the Forth.

As set out in Chapter 10 of the EIA Report and Appendix 10-1, the key elements of the asset's setting that contribute to its cultural significance, and the ability to understand, appreciate and experience them, comprise:

- Prominent, strategic and defensive location with extensive views along the Forth.
 - Understanding: readily accessible and intelligible on site but encroachment by modern urban and infrastructure development, the redevelopment of former King's Park as a golf course, and changes to land management strategies distracts from the legibility of the land which it controlled. Strategic value readily appreciable in views of the castle from the surrounding landscape – including across the Forth Valley, and on approaches to the asset from the south. The King's Old Building, which formed part of the later Renaissance developments, potentially had intentional views to the west and southwest while archaeological evidence suggests galleries were attached to the Queen's Inner Chamber and the Prince's Tower. However, these are heavily distracted from by further alterations to the King's Old Building and the removal of galleries.
 - Appreciation: the views to the southeast to northwest clearly define the land which this position was used to project control from. Views to the west and southwest which are thought to have formed part of the later Renaissance developments.
 - Experience: the strongest experience is from the asset itself and towards it (e.g. in approaches from the south and north, via the M9 motorway; from the Carse of Stirling to the west; from the east, downstream in the Forth valley) where its scale and position are most apparent. Key to this experience is the impression of the castle silhouetted against the sky in most directions, which will not be affected by the turbines.
- Visible from numerous locations within the landscape to which it projects authority and status.

- Understanding: readily intelligible in the landscape though with some distraction in that the associated King's Park is now a golf course.
- Appreciation: the grandeur and authority of the castle is readily appreciable from various locations within the local landscape, most notably, King's Park Conservation Area (CA220), Kings Knot Inventory Garden and Designed Landscape (GDL00241) and the Royal Gardens including King's Knot scheduled monument (SM90288).
- Experience: the views towards the castle are best experienced from the King's Park Conservation Area (CA220), Kings Knot Inventory Garden and Designed Landscape (GDL00241) and the Royal Gardens including King's Knot scheduled monument (SM90288) where its scale, grandeur and defensive position are most apparent.
- Open views over and along the Forth as well as general panoramic views.
 - Understanding: relationship and deliberate placement of asset readily understood from and adjacent to the asset.
 - Appreciation: best appreciated from and adjacent to the asset, and in views in combination with the asset from the southwest.
 - Experience: strong sense of connection to the landscape along the Forth as well as in general Panoramic views.

3.4.2 Baseline level of integrity

The asset's setting is largely characterised by its location on a volcanic outcrop commanding the lower Forth valley and the historic crossing points, surrounded by very substantial modern development, comprising the City of Stirling, and land management including extensive suburbs, modern transport infrastructure, outlying farm and steading developments, the redevelopment of the former King's Park as a golf course, and the modern character of farming and forestry patterns of land use.

There is some intervisibility with the Proposed Development to the southwest, as well as the existing Craigengelt Wind Farm.

The asset's setting therefore has a medium to high level of relative integrity. While the issues identified do detract from the current experience of the asset, all its key relationships remain intact and legible.

3.4.3 Impacts of change

Change to cultural significance

The contribution that setting makes to the cultural significance of Stirling Castle will not be altered by the introduction of the Proposed Development. The elements of setting that are fundamental to supplementing the understanding and importance of the physical fabric, archaeological value, and the spatial, symbolic and functional relationships of the asset will remain intact.

The ability to see turbines from the asset will in no way materially alter the ability to understand or appreciate these relationships. As indicated below, it is the experience of these factors that will necessarily be altered by the introduction of the Proposed Development.

Change to integrity of setting

The Proposed Development will result in the following physical changes in the landscape:

- Presence of turbines approximately 8.4km to the southeast within the context of the existing Craigengelt Wind Farm.
 - Turbines located above the skyline, outside of the upper Forth valley.
 - Turbines would not be a prominent feature in views to the southeast of the castle.
 - Turbines, by their nature, introduce additional movement to the landscape. The effect of this presence will be negligible for Stirling Castle due to its city centre location, high visitor traffic and level of foreground visual distraction.
- Creation of expanded/reinforced access network to facilitate construction and operation of the Proposed Development.
 - Not visible from the castle or its immediate environs.

Table 3-4: Impacts on integrity/factors of setting

Factor of setting (summary)	Understanding	Appreciation	Experience
Prominent, defensive location with extensive views along the upper Forth valley.	Relationships remain extant, level of prominence will not change, and location will still convey the defensibility of the site. Spatial and functional relationships with the Forth remain intact.	Sense of defensibility and deliberate location within the Forth valley bottom, and wider topography is unchanged and readily appreciable.	Physicality of the asset's location and the topography of the surrounding landscape will not be affected. Negligible Change
Visible from numerous locations within the landscape to which it projects authority and status.	Relationships remain extant, level of prominence will not change, and location will still convey the defensibility and status of the site.	Sense of openness will remain legible through a largely intact skyline with turbines reading as being at a distance and outside the Forth valley.	Largely unchanged with turbines absent in key in-combination views. Negligible Change
Open views over and along the Forth as well as general panoramic views.	Unchanged	Views from the asset largely unchanged; except in distinct areas where the intentionality of such views are no longer appreciable. Turbines read as being at a considerable distance and outside the Forth valley.	Largely unchanged with turbines only introduced to views in which the intentionality of such views are no longer appreciable. Small Change

3.4.4 Judgement on 'integrity test'

As Table 3-4 above illustrates, it is the experience of the factors of setting of Stirling Castle that will be impacted by the Proposed Development. The presence of turbines in the landscape will be only just recognisable and the visitor to the castle will retain the ability to understand and appreciate all of the key relationships of the asset.

3.24 Changes to the experience of these 'factors of setting' will be adversely affected, but to a very limited extent. Viewed in the context of the other changes – and the lack of any effects to the cultural significance of the asset, and the ability to understand and appreciate that significance, this is judged to constitute an adverse, but **not significant**, impact on the integrity of the asset's setting.

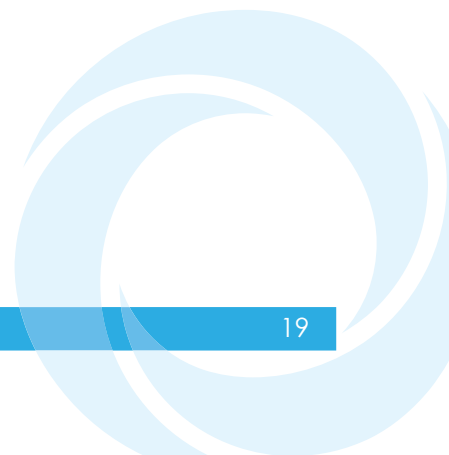
4 Conclusion

The analysis of the EIA findings set out above demonstrates that there will be **no significant adverse impact on the integrity of the setting** of the Kings Yett Cairn (SM2580), Dundaff Hill, mound (SM6553), Dundaff Hill, enclosure (SM7131) and Stirling Castle (SM90291).

There will be no adverse impacts as a consequence of setting change – reflected in the ‘minor’ effect noted in the EIA Report – arising from change to the experience of the assets. Nevertheless, the cultural significance of the assets, and the ability to understand and appreciate the ‘factors of setting’, in the terms of the adopted Rigg Hill definition, remain intact.

For this reason, the test set by NPF4 Policy 7 h ii is passed by the Proposed Development as significant impacts on the integrity of setting have been avoided. Similarly, the third limb of the policy, requiring the demonstration of ‘exceptional circumstances’, is not engaged.

It should also be noted that the archaeological/scientific value of the assets, which represents the larger part of their cultural significance, will also remain unchanged.



5 References

Historic Environment Scotland (2020; 2016) Managing Change in the Historic Environment: Setting

IEMA, IHBC & CIfA (2021) Principles of Cultural Heritage Impact Assessment in the UK

International Council on Monuments and Sites (ICOMOS) (2005) Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas.

Scottish Government (2023) National Planning Framework 4

Scottish Government (2014) Scottish Planning Policy (superseded)

