# SEI: CULTURAL HERITAGE AND ARCHAEOLOGY 11

# **CONTENTS**

INTRODUCTION11-1
CONSULTEE RESPONSES TO EIA REPORT11-1
DESIGN AMENDMENTS11-3
REVISED FIGURES11-3
ASSESSMENT OF DESIGN AMENDMENT EFFECTS
Construction Effects11-3
Operational Effects11-4
CUMULATIVE DEVELOPMENT UPDATE11-5
Cumulative Baseline11-5
Cumulative Effects11-5
SUMMARY OF CHANGES TO THE SIGNIFICANCE OF EFFECTS11-6
CONCLUSIONS11-6
REFERENCES11-6
TABLES
Table 11- 1: Consultee Responses

#### Introduction

- 11.1 **Chapter 11: Cultural Heritage and Archaeology** of the Environmental Impact Assessment (EIA) Report presents the findings of the assessment of the potential effects on cultural heritage assets resulting from the application layout of the Proposed Development as submitted in August 2023.
- 11.2 This Supplementary Environmental Information (SEI) Chapter supplements **Chapter 11** of the EIA Report and sets out clarification of any potential changes to the impacts set out in the EIA Report due to the changes in the proposals. The methodology employed in this SEI is as set out in the **EIA Chapter 11**.
- 11.3 The following key documents should be read in conjunction with this SEI:
  - EIA Report Volume 2 Chapter 11: Cultural Heritage and Archaeology;
  - EIA Report Volume 3d Figures 11.1 to 11.3 and Figures 11.4 to 11.21.
  - EIA Report Volume 4b Technical Appendices 11.1 to 11.3.

## Consultee Responses to EIA Report

11.4 **Table 11-1** provides a summary of the consultation with regards to cultural heritage and archaeology related to the application layout of the Proposed Development. A response to the consultee comments is also provided.

**Table 11-1: Consultee Responses** 

Consultee	Summary of Key Issues	Responses to Comments
Historic Environment Scotland (HES) 16 November 2023	HES do not object to the Proposed Development.  HES assess the Dun Feorlig, broch 230m NNE of Feorlig Farm (SM3494) and Abhainn Bhaile Mheadhonaich, broch and standing stone 145m SE of An Cairidh (SM13664) to have a higher level of impact than outlined in the EIA, but do not believe it to be sufficient to merit an objection.  HES consider Dun Arkaig, broch (SM13662) to be susceptible to significant setting impacts due to the cumulative presence of operational (Edinbane Wind Farm) and consented (Glen Ullinish Wind Farm) turbines with those proposed for Balmeanach, exacerbating the overall prominence of turbines over the valley and outward views of the broch. However, due to the extent of impacts from the existing Edinbane windfarm, the impacts would not be sufficient to warrant an objection.  Impacts upon this asset could be reduced by lowering the heights of turbines along the ridge facing the monument.	No responses or actions.  While it is acknowledged that HES disagree with some of the conclusions of the setting impact assessment within the submitted EIA, it is agreed that these impacts would not be sufficient to warrant an objection, nor would these impacts change to such a degree with the revised layout that these would be considered to change to significance impacts.  Amendments to the layout of the Proposed Development are not a result of these comments.



Consultee	Summary of Key Issues	Responses to Comments
The Highland Council Historic Environment Team (THCHET) 10 November 2023	The cultural heritage chapter of the EIA provides an adequate level of detail and describes the predicted impacts and sets out a range of mitigation in regard to those impacts. The mitigation includes markingout and avoidance of recorded assets; and a targeted watching brief during groundworks in four specific areas where archaeological potentials is identified. In order to secure the mitigation proposed a planning condition is suggested:  ARCO1C. No works in connection with the development hereby approved shall commence unless an archaeological Written Scheme of Investigation (WSI) has been submitted to and approved in writing by the planning authority and a programme of archaeological works has been carried out in accordance with the approved WSI. The WSI shall include details of how the recording and recovery of archaeological	Responses to Comments  The Applicant is happy with the planning condition being part of any consent.
	resources found within the application site shall be undertaken, and how any updates, if required, to the written scheme of investigation will be provided throughout the implementation of the programme of archaeological works. Should the archaeological works reveal the need for post excavation analysis the development hereby approved shall not be occupied or brought into use unless a Post-Excavation Research Design (PERD) for the analysis, publication and dissemination of results and archive deposition has been submitted to and approved in writing by the planning authority. The PERD shall be carried out in complete accordance with the approved details. Reason. In order to protect the archaeological and historic interest of the site.	

11.5 It is noted that on 02 April 2025, THCHET responded to the Ben Sca Redesign Wind Farm application (24/01404/FUL), which would be located adjacent to the Proposed Development, noting their concern about potential setting effects on the Dunvegan Castle and Garden and Designed Landscape (GDL) when viewed from the B884, at Colbost. Whilst this response has not been received in relation to the Balmeanach Wind Farm it is reiterated that potential significant effects on the Dunvegan Castle and GDL were scoped out of the assessment previously with HES, and HES are content that there are no significant effects on the setting of this asset from the Balmeanach Wind Farm. **SEI Figure 11.22** is a new visualisation figure which has been prepared to assist in this discussion. Photography from this location is also shown by the visualisation submitted with the Glen Ullinish II Wind Farm EIA Report VP16, Colbost, Figure 6.41 (Muirhall



Energy, 2023). The view of the revised layout of the Proposed Development with Dunvegan Castle and its GDL in the foreground, from the B884, from Colbost, would not be prominent enough to contribute towards the ability to understand, experience or appreciate the asset within its historic setting. Therefore, the conclusion that there would be no significant effects on this asset remains valid.

## **Design Amendments**

- 11.6 The changes to the Proposed Development (as detailed in SEI Chapter 2) which may affect the heritage assessment (although were not made in response to heritage concerns) include the following:
  - removal of Turbine 1 (T1), the track to T1 and associated foundation and crane hardstanding;
  - amendments to the track layout to reduce the length of track required, remove spurs and turning heads where possible and reorientate crane hardstandings to reduce effects on peat:
  - the relocation of the substation to within the footprint of Borrow Pit 3:
  - inclusion of proposed link to be part of the Proposed Development in the event that the consented Ben Sca Wind Farm does not get built; and
  - addition of the permanent construction compound (Compound 1) to the south of the A850 to ensure that the proposed link track would be able to be built to the site (in the absence of the consented Ben Sca Wind Farm).

## **Revised Figures**

- 11.7 The cultural heritage figures and visualisations have been updated with the revised layout as follows (superseding EIA Figures 11.1 to 11.21):
  - SEI Figure 11.1: Gazetteer Assets;
  - SEI Figure 11.2: Heritage Designations;
  - SEI Figure 11.3: Heritage Viewpoints; and
  - SEI Figures 11.4 to 11.22: Visualisations including wirelines and a photomontage for heritage viewpoints VP01 to VP010.

## **Assessment of Design Amendment Effects**

#### **Construction Effects**

- 11.8 The Proposed Development application layout was identified to have potential direct impacts upon the following assets (EIA Figures 11.1a-b):
  - SLR54 Possible mound (located 37m from previously proposed infrastructure);
  - SLR55 Possible clearance cairn (located 125m from proposed infrastructure);
  - SLR56 Possible marker cairn (located 52m from proposed infrastructure);
  - SLR91 Possible marker cairn (located 10m from proposed infrastructure); and
  - SLR93 Possible marker cairn (located 32m from proposed infrastructure).



- 11.9 The changes to the layout of the Proposed Development do not affect the proximity of the above assets to the proposed infrastructure and therefore the level of predicted effects do not change from **EIA Chapter 11** and remain slight and not significant.
- 11.10 As shown on **SEI Figure 11.1** SLR92 (possible marker cairn) would also be located 32m from the proposed infrastructure if the proposed link track is used, in the absence of the Ben Sca Wind Farm. This asset is considered to be of negligible significance. The likely magnitude of impact would be nil, resulting in no significance of effect.
- 11.11 There are no other assets identified in close proximity to the proposed link track which may be affected by its construction.
- 11.12 The mitigation outlined within **EIA Chapter 11** for all assets in proximity to the proposed infrastructure (including SLR92 if the proposed link is used) is still recommended to ensure protection during construction.

### **Operational Effects**

11.13 **EIA Chapter 11** assessed the setting and cumulative effects upon heritage assets as shown in **Table 11-2**.

Table 11- 2: Setting and Cumulative Effects identified

Designated Asset	Viewpoint Figure Number	Significance of Effect from Setting Impact	Cumulative Impact
Dun Feorlig, Broch 230m NNE of Feorlig Farm (SM3494)	SEI Figure 11.6 and 11.15	Very slight	None
Abhainn Bhaile Mheadhonaich, Broch and Standing Stone (SM13664)	SEI Figure 11.7 and 11.16	Very slight	None
Dun Arkaig, Broch (SM13662)	SEI Figure 11.5 and 11.14	Very slight	Slight
Dun Flashader, broch, Skye (SM911)	SEI Figure 11.9 and 11.18	Very slight	None
Dun Osdale, broch 850m N of Osdale (SM3493)	SEI Figure 11.8 and 11.17	Very slight	None
Dun Neill, dun 420m SW of Ardmore (SM3885)	SEI Figure 11.4 and 11.13	Very slight	None
Barpannan, two chambered cairns, Vatten Duirinish (SM893)	SEI Figure 11.11 and 11.20	Very slight	None
Ullinish Lodge, chambered cairn, Bracadale (SM903)	SEI Figure 11.10 and 11.19	Very slight	None
Ullinish, fort, Bracadale (SM930)	SEI Figure 11.12 and 11.21	Very slight	None

11.14 The only change within the revised layout which would affect setting impacts would be the removal of T1. The removal of this turbine would not cause an increase or decrease in the potential setting impacts of any of these assets and therefore would cause no change to the setting impacts outlined in **Table 11-2**.



11.15 As noted above, it is also considered that the revised layout of the Proposed Development would not be prominent enough to contribute towards the ability to understand, experience or appreciate the Dunvegan Castle and GDL within its historic setting. Therefore, the conclusion that there would be no significant effects on this asset remains valid.

## **Cumulative Development Update**

#### **Cumulative Baseline**

- Since the submission of the application, the cumulative wind farm situation in the study 11.16 area has changed. The relevant changes to the cumulative baseline are as follows:
  - Ben Sca Redesign Wind Farm (application)
  - Ben Aketil Repowering and Extension (application)
  - Glen Ullinish II Wind Farm (Redesign) (application)
  - Beinn Mheadhonach Redesign (application)
  - Edinbane Repowering and Extension (scoping) •
  - Edinbane Land at 4 Edinbane (screening)

#### **Cumulative Effects**

- 11.17 The combined effects which would result should the Proposed Development be constructed alongside the proposed Ben Sca Redesign Wind Farm, are discussed in full in Volume 5 of this SEI Report.
- 11.18 The cumulative effects on the setting of Dun Arkaig was assessed in EIA Chapter 11. A slight cumulative effect was identified upon Dun Arkaig due to the proposed turbines forming an extension to the turbines of the operational Edinbane Wind Farm, the proposed Ben Sca Redesign Wind Farm turbines and the operational Ben Aketil Wind Farm (5.8km and 5km to the northwest respectively) would also both be present within these views toward the Proposed Development; however, their presence would be minor beyond the horizon.
- 11.19 The cumulative baseline now includes Glen Ullinish II Redesign, northeast of the asset, and slightly more visibility of turbines of Ben Aketil Repowering (3 turbine tips) within northwest views (SEI Figure 11.5).
- 11.20 Dun Arkaig is located within the consented Glen Ullinish Wind Farm site, with consented turbines proximate to the east, south and southwest of the asset also, as seen in SEI Figures 11.5b - d. The consented Glen Ullinish Wind Farm site, if built, would encompass Dun Arkaig with turbines from the southwest to east, although the proposed Glen Ullinish II Redesign turbines (which would replace the consented site) have removed turbines in this area to avoid this encirclement.
- 11.21 Dun Arkaig would have overlapping views of the Glen Ullinish II Redesign turbines to the northeast, followed by Edinbane Wind Farm (operational and proposed), Balmeanach and Ben Sca (consented development or redesign) and Ben Aketil (operational and proposed) from east to northwest.
- 11.22 As outlined in EIA Chapter 11, key aspects of Dun Arkaig's setting comprise views to other contemporary prehistoric brochs to the west (SM13664 and SM3494), which would have formed a chain along the River Ose c.0.5km to the north of the asset and enters the



- sea c.4km to the southwest. The broch would have likely overlooked and controlled the accessible point from the coast to the west where the River Ose ends, and the access inland along Glen Colbost, over which the broch is strategically positioned to overlook.
- 11.23 The revised layout of the Balmeanach Wind Farm and the cumulative developments within north-facing views would form a cohesive scheme along the northern backdrop above Glen Colbost. These turbines would still distract from the ability to appreciate the north views which contribute toward Dun Arkaig's setting, and though there has been an increase in the number and presence of turbines within the cumulative assessment since the assessment was undertaken for the application layout, would not increase in the level of distraction, nor detract from the ability to understand and experience the asset within northern views, as the contextual setting of the asset with the River Ose and Glen Colbost to the north would remain intact. The views of turbines above the glen to the north would also not exceed the effect of the consented Glen Ullinish Wind Farm in which the asset is located, with turbines visible to the southwest of the asset along the River Ose and toward the coast. These turbines would also be proximate to the northeast and south of the asset. As such, much more proximate turbines shall be part of the modern setting of the asset.
- 11.24 When considering the cumulative baseline, whilst the presence of turbines within north-facing views has increased since the application layout was assessed, it would not be considered to increase the level of adverse impact already outlined in **EIA Chapter 11**. The addition of the revised layout of the Balmeanach Wind Farm within this complex of wind farms would not be considered to be higher than a low adverse magnitude of impact, resulting in a minor significance of effect.
- 11.25 This cumulative impact therefore remains unchanged from that assessed in **EIA Chapter 11** and is not significant.

# **Summary of Changes to the Significance of Effects**

- 11.26 The mitigation outlined within **EIA Chapter 11** for the closest heritage assets to the revised layout of the Proposed Development would be implemented to ensure protection during construction and no significant effects.
- 11.27 No setting impacts have been identified to vary from those outlined in the previous setting impact assessments. Whilst a turbine has been removed from the design, it is not considered that the removal of one turbine would reduce the impacts to such a degree to change these conclusions.
- 11.28 No significant cumulative effects on cultural heritage are anticipated as a result of the Proposed Development.

### **Conclusions**

11.29 Overall, no significant effects have been identified in EIA terms for the revised layout.

### References

Muirhall Energy (2023). Glen Ullinish II Wind Farm EIA Report.

