

Technical Appendix 7.4:

Cultural Heritage Consultation

15 February 2023

Historic Environment Scotland
Longmore House
Edinburgh

By email only to: HMConsultations@hes.scot

Our Ref: 405.03635.064899.00001

Dear Sir/Madam

**PROPOSED BLAIR HILL WIND FARM:
PRE-APPLICATION ADVICE REQUEST**

I write on behalf of Renewable Energy Systems (RES) Limited to request pre-application advice from Historic Environment Scotland (HES) with regards to a proposed development at Blair Hill, located approximately 4 km northeast of Newton Stewart, Dumfries and Galloway.

Proposed Development

The current design proposes 29 turbines at a maximum height of 210m blade to tip, distributed across the proposed site. This will be alongside standard infrastructure – exact details to be confirmed at a later stage -such as:

- wind turbine foundations;
- hardstand areas for erection of cranes at each wind turbine location;
- a network of access tracks including watercourse crossings, passing places, turning heads and site entrances from the public road network;
- borrow pits (dependent on availability of stone within the site);
- a substation compound containing electrical infrastructure and a control building;
- welfare facilities and a communications mast;
- a battery energy storage system (BESS);
- a network of buried electrical and communication cables; and
- a temporary construction compound.

The proposed development is located to the northeast of Drannadow Farm (**LB17056**) on an unnamed road that runs adjacent to the A7714 and River Cree. The site is approximately 1,309 hectares occupying Blair Hill, White Hill, Glenmalloch Hill, Benailsa and Sheuchower.

In order to enable early and meaningful discussion on these proposals, an initial indicative layout is enclosed, along with a series of wirelines based upon this layout. These wirelines are shown from the viewpoint locations proposed to be used for the Cultural Heritage impact assessment scoping exercise.

Also included are:

- A figure depicting designated cultural heritage assets; this includes a 'bare earth' Zone of Theoretical Visibility (ZTV) extending to a distance of 15km (Figure 2), and the wireline viewpoint locations.

Request for Pre-Application Advice

As the current design iteration for Blair Hill Wind Farm proposes an installed capacity in excess of 50 MW, the application for consent will be made to Scottish Ministers under Section 36 of the Electricity Act 1989.

Given the characteristics of the proposed development, it has the potential to result in significant environmental effects, and an Environmental Impact Assessment (EIA) Report will therefore be submitted with the application. A request for an EIA scoping opinion will be made to the Energy Consents Unit on behalf of Scottish Ministers to establish the scope of this assessment.

Whilst a scoping report shall be submitted in due course, in line with EIA regulations, this pre-application request is seeking early feedback and advice from HES on the following matters:

- identification of the key constraints and opportunities which apply to the site and the proposed development;
- identification of the key Development Plan policies and supplementary planning guidance relevant to the proposals;
- identification of the key national legislation and policy that the planning authority would take into account in assessing the overall planning balance of the proposals and making its formal consultation response to Scottish Ministers; and
- most importantly, an early opinion on whether or not HES consider that they would be likely to support the proposed wind farm if it is brought forward for application. If HES consider that the proposals are unlikely to be acceptable, advice on what scale and form of development would be supported in this location would be welcomed, as it would help ensure a heritage-sensitive design proposal and expedite the EIA consultation and assessment process.

Conclusions

I look forward to acknowledgement of receipt of this pre-application request and to hearing your thoughts on the above. I trust that the information enclosed within this pre-application letter provides you with sufficient information for this purpose. However, should you wish to discuss the proposals further, or request any additional information, please do not hesitate to contact me.

Yours sincerely
SLR Consulting Limited

Beth Gray
Associate Heritage Consultant

Copied to:
Sarah McArthur (Sarah.mcarthur@res-group.com)

Enclosed:
Blair Hill Figure 1: Heritage Designations
Blair Hill Wirelines



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By email to: bgray@slrconsulting.com

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Our case ID: 300063899
Your ref: 405.03539.064899.00001
17 March 2023

Dear Beth Gray

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017](#)
[Blair Hill Wind Farm](#)
[Pre-application Advice](#)

Thank you for your recent pre-application consultation which we received on 15 February 2023 regarding the above proposed development. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A listed buildings and their settings, inventory gardens and designed landscapes (GDLs), inventory battlefields and Historic Marine Protected Areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Background

We understand that the proposed development will comprise up to 29 wind turbines to maximum blade tip height of 210m, plus associated ancillary infrastructure including access tracks, borrow pits, substation, control building, battery energy storage system, network of underground cables and temporary construction compounds.

We welcome the opportunity to provide comments on the preliminary layout, ZTV and draft wirelines at this early stage in the proposed development.

Comment on the principle of the proposal

Without prejudice and based on the information provided so far, we have significant concerns at this stage about the potential significant adverse impacts on the integrity of



the setting of scheduled monuments located within the development site application boundary and in the vicinity of the proposed development. At this stage we consider it likely that the adverse impacts on the setting of assets within and around the proposed development would be such that they would raise issues of national interest and we would therefore object to the proposed development. Further information regarding specific assets is provided in the attached annex.

It may be possible to accommodate a small number of wind turbines in the north-west and north-east edges of the proposed development site. This advice is necessarily provisional and should a development in this location be brought forward, further information would need to be provided to assist with the identification of any areas which may accommodate wind turbines without significant adverse impacts on the setting of designated historic environment assets.

We strongly recommend further dialogue with us if this proposal progresses and would be happy to advise on any potential redesign in the north-east and north-west areas of the site.

Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements who can be contacted by phone on 0131 668 8730 or by email on Victoria.Clements@hes.scot.

Yours sincerely

Historic Environment Scotland



Annex

There are scheduled monuments located within the development boundary. While we note that the current layout has turbines in locations which may avoid direct physical impacts on the scheduled monuments (see detailed comments below), there is no indication of where the ancillary infrastructure such as access tracks and substations may be located. There remains the potential therefore for direct physical impacts on these assets. The design of any proposals should avoid any direct impacts on these nationally important assets, in line with national policies. We note that any direct impacts on these assets are likely to require [scheduled monument consent](#) as administered by HES and that based on the current information we would be unlikely to grant consent for works within the scheduled areas.

At this stage and based on the information provided to us, we consider that the following designated historic environment assets may receive adverse impacts to their setting from the proposed development. This list is not considered to be exhaustive, and we would recommend that a wider search is undertaken of the surrounding area for potential impacts in the first instance.

Scheduled monuments

The proposed development is located in the Cree valley, in a rich archaeological landscape which includes the Coldstream Burn Archaeologically Sensitive Area. We recommend that you seek advice on potential impacts on the Archaeologically Sensitive Area from Dumfries & Galloway Council's archaeological advisor. The site is noted to have the only known group of prehistoric monuments surviving in an open landscape setting. This includes scheduled monuments and other undesignated archaeology within their immediate setting which enhances the importance of the designated sites and contributes to the way in which they are understood, appreciated and experienced. The presence of a number of cairns, chambered cairns, a stone circle and standing stones demonstrates the use and importance of this area of land throughout the prehistoric period. The location of the prehistoric monuments away from the summits of the hills indicates that they were located to have a visual and spatial relationship with the River Cree to the west and south-west of the site, with views along the river valley and west towards the hills.

Our main concerns are the direct impacts to the prehistoric scheduled monuments within the site, potential impacts on their setting, and disruption of the key relationships between the monuments in the area within and surrounding the proposed development site.

The Thieves, standing stones, Blair Hill (SM1044)

This scheduled monument comprises two standing stones approximately 2m in height and aligned north-east/south-west. A third stone lies prostrate in the south-east of the



oval enclosure which surrounds the stones. The monument is located in open, grass moorland on a ridge overlooking the valley of the Cordorcan Burn to the north-west with clear views across the moorland landscape and out towards the Cree valley.

Stone alignments together with individual standing stones and stone circles, form part of ritual prehistoric landscapes, sometimes of great complexity. Within 1km of the standing stones are the remains of stone circle at Drumfern (SM1019) at approximately 0.71km to the south-west, a chambered cairn at Napper's Cottage (SM5676) approximately 0.4km to the south-east and between the standing stones and these monuments are three undesignated burial cairns. These monuments are all within the centre of the development site boundary.

The key characteristics of the setting of the monument include its relationship with, and views out to, the Cree valley to the west, and the spatial and visual relationships with the other surrounding prehistoric monuments both within and outwith the development site.

The proposed development includes several turbines in close proximity to this monument and directly within key views to other prehistoric monuments, interrupting the visual and spatial relationship between them and disrupting views towards the Cree valley. The proposed development would have a significant adverse impact on the setting of the monument due to the introduction of clearly visible large-scale turbines in close proximity and in the key views out from and towards the standing stones.

Drumfern, cairn and remains of stone circle (SM1019)

This scheduled monument comprises a cairn and the remains of a stone circle on a south-west facing slope at approximately 165m AOD. Several small cairns lie scattered around the larger cairn and the circle. The monument is of national importance as an unusual pairing of cairn and stone circle which taken together have the potential to provide information about Bronze Age burial practices and ritual beliefs. The importance of each site is enhanced by the proximity of the other, and the possibility of investigating their inter-relationship.

The key characteristics of the setting of the monument include its relationship with and views out to the Cree valley to the west, and the clear relationship with and views to the other surrounding prehistoric monuments, including The Thieves standing stones (SM1044) and chambered cairn at Napper's Cottage (SM5676) to the north-east.

The proposed development includes several turbines in close proximity to this monument and directly within key views to other prehistoric monuments, interrupting the visual and spatial relationship between them and disrupting views towards the Cree valley. Due to the scale of the ZTV provided, one turbine (T25) appears to be proposed to be located adjacent to the monument, therefore there is the potential for significant adverse direct impacts to this monument. The proposed development would also have a significant



adverse impact on the setting of the monument due to the introduction of clearly visible large-scale turbines in close proximity and in the key views out from and towards the cairn and stone circle.

Napper's Cottage, chambered cairn (SM5676)

This scheduled monument comprises a chambered cairn of Neolithic date, belonging to the group known as Clyde cairns. The cairn survives to a height of approximately 1.5m above the surrounding ground surface, and this, together with quantities of loose stone on its upper surface, make it a clearly visible feature in the landscape. The cairn is considered to be of national importance as one of the most visible and best-preserved chambered cairns of Clyde type. Evidence may also survive, under and around the visible monument, relating to earlier activity on the site and any earlier phases of cairn construction which might have preceded the visible structure.

The monument is located on a south-west facing slope at approximately 200m AOD. As with the other prehistoric monuments in the area which make up this group of important ritual features in the open landscape, the key characteristics of the setting of the monument are its relationship with, and clear and expansive views out to, the Cree valley to the west, and the strong visual and spatial relationships with the other surrounding prehistoric monuments within and outwith the development site.

The proposed development includes several turbines in close proximity to this monument and directly within key views to other prehistoric monuments, interrupting the visual and spatial relationship between them and disrupting views towards the Cree valley. Due to the scale of the ZTV, one turbine (T24) appears to be proposed to be located adjacent to or within the scheduled area, therefore there is the potential for significant adverse direct impacts to this monument. The proposed development would also have a significant adverse impact on the setting of the monument due to the introduction of clearly visible large-scale turbines in close proximity and in the views out from and towards the cairn and stone circle.

Dalvaird, cairn 320m NNE of (SM1015)

This scheduled monument comprises the remains of a prehistoric burial cairn, visible as an upstanding mound. The cairn is situated in rough moorland with an open aspect, overlooking the Cordorcan Burn and Black Burn with clear views out to the south-west towards the Cree valley. The cairn is considered to be of national importance for its potential to enhance our knowledge of prehistoric funerary and ritual practices and the site is overlooked from the east by a number of undesignated cairns on the slope above Black Burn.

The key characteristics of the setting of the monument are its relationship with and views out to the Cree valley to the south-west, and the spatial and visual relationship with the other prehistoric monuments in the development site.



The proposed development includes several turbines in close proximity to this monument and directly within key views to other prehistoric monuments, interrupting the visual and spatial relationship between them and disturbing views towards the Cree valley. Due to the scale of the ZTV, one turbine (T10) appears to be proposed to be located adjacent to or within the scheduled area, therefore there is the potential for significant adverse direct impacts to this monument. The proposed development would also have a significant adverse impact on the setting of the monument due to the introduction of clearly visible large-scale turbines in close proximity and in the views out from and towards the cairn.

Cordorcan, cairn 750m NE of (SM10385)

This scheduled monument comprises the remains of a prehistoric burial cairn, visible as an upstanding mound. The cairn is situated in open ground, 300m west of Cordorcan Burn. The cairn is considered to be of national importance for its potential to enhance our knowledge of prehistoric funerary and ritual practices.

The key characteristics of the setting of the monument are its relationship with and views out to the Cree valley to the south-west, and the spatial and visual relationship with the other prehistoric monuments within the development site.

The monument is located just outwith the development site boundary, however the proposed development includes several turbines directly within key views to other prehistoric monuments from the cairn, interrupting the visual and spatial relationship between them and also disrupting views towards the Cree valley. The proposed development would also have a significant adverse impact on the setting of the monument due to the introduction of clearly visible large-scale turbines in close proximity and in the views out from and towards the cairn.

Garlies Castle (SM7916)

This scheduled monument comprises the substantial remains of Garlies Castle, a tower house of late-15th/early-16th-century date with extensive later additions. The monument occupies a position of natural strength above a steep south-east facing slope above Castle Burn. Although the monument is currently situated within woodland, its elevated position still affords long distance and wide sweeping views out over the surrounding landscape, particularly towards the south and these views and the reciprocal views towards it are a key contributor to its cultural significance.

The proposed development includes several turbines in close proximity to this monument (T20, T21 and T22) and they are likely to be visible behind the monument in key views of the tower from the south. Therefore, these three turbines could detract from the monument as a prominent defensive feature in the landscape. The proposed development therefore has the potential for significant adverse impacts on the setting of



the monument due to the introduction of clearly visible large-scale turbines in the views towards the monument, in particular views of the tower.

Other scheduled monuments

Given the height of the proposed turbines, it is likely that a development in this location will be visible from a large number of other scheduled monuments in the surrounding area. Should a development in this location progress, we advise that the following assets should be considered for significant impacts on their setting, but it should be noted that this list is not exhaustive:

- Boreland, chambered cairn (SM1004)
- Drumwhirn, cairn N of Boreland (SM1021)
- Skaith Mote, motte 700m SSW of Challoch (SM2023)
- Cairnsmore of Fleet, cairn (SM2316)
- Machars Hill, motte (SM1126)
- White Cairn, chambered cairn 630m W of Glentool School (SM1049)
- White Cairn, cairn 910m NNE of Bargrennan Cottage (SM1048)
- Deil's Dyke, linear earthwork, Hill of Ochiltree (SM1966)
- Cairn Kinna, two cairns 960m ESE of Corrafeckloch (SM1008)

Category A listed buildings

There are also a number of category A listed buildings in the wider vicinity of the proposed development which could potentially receive impacts to their setting from a proposed wind farm development of this scale in this location. We recommend that potential for impacts on the setting of the following assets should also be assessed should a development in this location be taken forward; again this list is not exhaustive:

- Cumloden House (LB17052)
- Challoch, All Saints Episcopal Church (LB19190)
- Category A listed buildings in and around Minnigaff and Newton Stewart

Visualisations

We appreciate that you have provided a number of draft wirelines at this early stage which we found useful. The draft wirelines provided are from three designated heritage assets outwith the development site boundary (SM1966, SM7916, and SM1015) and from the non-designated Coldstream Burn Archaeologically Sensitive Area within the development site. The wireframe from SM1966 illustrates that a proposed development of this scale in this location would be highly visible in the landscape over a significant distance and therefore has the potential to adversely impact on the setting of designated assets in the wider area surrounding the development site. The wireframes from



SM7916 and SM1015 illustrate the significant adverse impacts that the proposals based on the current layout would have on the integrity of the setting of these scheduled monuments as described above. We refer you to the Local Authority's archaeological advisor for views on the wireframe from the Archaeologically Sensitive Area.

As this is an early stage consultation we recognise that draft wireframes have been provided for only a small selection of historic environment assets which could potentially be affected by the proposed development. Should a development in this location progress we would expect visualisations to be provided for any designated asset which might potentially receive significant adverse impacts to its setting to assist with assessment. In this case we recommend that the following additional visualisations would be likely to be required at a minimum:

Wireframes and photomontages

- Drumfern, cairn and remains of stone circle (SM1019)
- The Thieves, standing stones, Blair Hill (SM1044)
- Napper's Cottage, chambered cairn (SM5676)
- Boreland, chambered cairn (SM1004)
- Drumwhirn, cairn N of Boreland (SM1021)

Wireframes

- Skaith Mote, motte 700m SSW of Challoch (SM2023)
- Cairnsmore of Fleet, cairn (SM2316)
- Machars Hill, motte (SM1126)
- White Cairn, chambered cairn 630m W of Glentrool School (SM1049)
- White Cairn, cairn 910m NNE of Bargrennan Cottage (SM1048)
- Cairn Kinna, two cairns 960m ESE of Corrafeckloch (SM1008)

Summary

At this stage the information provided to us is understandably limited – there are no details regarding ancillary infrastructure, for example. Based on the available information on the proposed turbine size and location alone, there is the potential for very large turbines to be visible in close proximity to a number of scheduled monuments. Turbines of this scale in this proximity are likely to have a significant adverse impact on the integrity of the setting of the group of prehistoric monuments within the development site (SM1044, SM1019, SM5676 and SM1015), as they would impact on the distinct sense of place afforded to them by their remote and open upland rural location, as well as important views to and from the monuments and key inter-relationships.



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We consider that the proposals have the potential to give rise to direct impacts and would have significant adverse impacts on the setting of a large number of heritage assets within our remit located within and in the vicinity of the proposed development. Based on the information available, it appears likely that the proposed development would raise issues in the national interest such that we would object should it come forward in this design.

Historic Environment Scotland

17 March 2023



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Our case ID: 300063899

30 April 2024

Dear Beth Gray

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017
Blair Hill Wind Farm
Pre-application consultation - updated layout](#)

Thank you for your recent pre-application consultation which we received on 12 April 2024 regarding the above proposed development. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A listed buildings and their settings, inventory gardens and designed landscapes (GDLs), inventory battlefields and Historic Marine Protected Areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Background

We understand that a further two turbines have been removed from the proposed development at this stage and that the proposals are now for 16 wind turbines to between 210m and 250m maximum blade tip height. We note that there have also been some slight alterations and updates to the layout of some of the turbines in the scheme since we last provided advice in January. We welcome that the associated infrastructure including access tracks, site buildings and potential borrow pits are also illustrated on this most recent design layout.

Our advice

We have reviewed the latest design layout and the draft wireframes provided to support the layout and have the following comments to offer.

Despite some positive changes since we were last consulted, the current layout still has the potential to raise issues of national interest for scheduled monuments such that we would likely object to the proposals.



As shown in the Blair Hill Design Chill document, turbines 5 and 6 are still within the bowl-shaped landscape feature around [Dalvaird, cairn 320m NNE of \(SM1015\)](#), which is a key feature of the setting of this monument. As can be seen on 9103_VP_Heritage_Dalvaird_Cairn, turbine 6 in particular is very close to the cairn and would significantly affect the appreciation of the monument within its setting and fundamentally change the experience of being at the cairn. It is not clear how the impact from turbine 6 could be mitigated other than by its removal from the scheme. It might be possible to mitigate the impact of turbine 5 by relocating it further away from the cairn. As currently proposed both turbine 6 and turbine 5 would raise issues of national interest for this monument such that we would be likely to object.

In our previous comments we have highlighted the importance of the alignment of [Napper's Cottage, chambered cairn \(SM5676\)](#). We stressed that the view broadly to the east across the monument along this alignment is a key part of its setting. Information on the exact orientation of the cairn has not yet been provided. This means that the relationship between this alignment and the proposed development has still not been established. It is therefore possible that any of turbines 9, 10, 11, or 12, as shown in the Blair Hill Design Chill document could appear directly behind the monument in this key view. There is currently insufficient information for us to determine if this is the case and if an issue of national interest for the setting of this monument would be raised.

We strongly recommend that before design freeze:

- you ensure that turbines are positioned so as to avoid one of them appearing directly behind the monument in views along its axis.

We also recommend that:

- any EIA Report provides information about the exact orientation of the cairn axis and assesses the position of the turbines to the east relative to that axis.

At present, the wireframe view broadly east from the cairn is split between 2 figures, centred on bearings 35 degrees and 125 degrees. We strongly recommend the axis of the cairn is established, and a third figure is provided centred on exactly the bearing of the cairn axis.

Ideally, the visualisation should show the view across the chambered cairn, from a point just to the west, looking along the main axis of the monument and showing clearly the relationship between this alignment and the turbines within the proposed development.

We welcome the removal of turbines 9, 13, and 18 from the previous layout (as shown on 405.064899.00001.0003.2 CH Assets within Proposed Development sent to us on 19 January 2024). In our comments of 31 January 2024, we had highlighted these turbines



as being potentially problematic; their removal would reduce the negative impact of the development on the historic environment.

In particular the removal of turbines 9 and 13 would mean that, although there would still be a significant impact on the settings of [The Thieves, standing stones, Blair Hill \(SM1044\)](#) and [Drumfern, cairn and remains of stone circle \(SM1019\)](#), this would no longer be of a level sufficient to raise issues of national interest for these monuments.

We note that based on the current design it appears that none of the associated infrastructure would be likely to have direct physical impacts on the scheduled monuments within the site boundary.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements who can be contacted by phone on 0131 668 8730 or by email on Victoria.Clements@hes.scot.

Yours sincerely

Historic Environment Scotland



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Our case ID: 300063899

20 May 2024

Dear Beth Gray

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017
Blair Hill Wind Farm
Pre-application consultation - updated visualisations](#)

Thank you for your recent pre-application consultation which we received on 13 May 2024 regarding the above proposed development. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A listed buildings and their settings, inventory gardens and designed landscapes (GDLs), inventory battlefields and Historic Marine Protected Areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Background

We welcome the opportunity to comment on the updated visualisations for the [Napper's Cottage, chambered cairn \(SM5676\)](#) scheduled monument.

We note that the numbering of the turbines on the visualisations appears to differ from the numbering of the turbines on the most recent layout plan which we received on 12 April (the Blair Hill Design Chill layout). It is therefore not clear whether further design changes have been made to the layout since we provided our previous comments on 30 April. For clarity, our comments in this response refer to the numbering of the turbines as shown on the Napper's Cottage cairn visualisations.



Our advice

We welcome the updated visualisations showing potential impacts of the proposed development on views from Napper's Cottage, chambered cairn (SM5676). The following comments are based on the images and visualisations provided to us on 13 May. We note that the photographs used as part of these visualisations are very narrow in their focus and adhere closely to the upstanding features of the cairn. We understand that these photographs have been provided to assist with assessment of the potential impacts on this asset at this stage and prior to the production of full photomontages for the full EIA Report. A broader view of the surrounding landscape would help form a more accurate impression of the impacts of the proposed development and we recommend that this is provided in the EIA Report visualisations. We are largely content with the location and direction of the draft visualisations provided. We plan to conduct a site visit in the near future, after which we will be able to provide further feedback on the current proposals.

We have previously advised that the cairn at Napper's Cottage is a Clyde type cairn of elongated oval shape and that views along the main axis of the cairn are a key aspect of the setting of this monument. The latest images confirm that Turbine 10, as numbered in the visualisations supplied to us on 13 May, would appear almost directly in line with the key view along the cairn's axis and would have a significant impact on the setting of the monument.

The visualisations also show that Turbine 11, as numbered on the image and sited to the right of turbine 10 in this view, would appear on the periphery of the key view along the axis of the cairn and at a proximity and scale likely to dominate the experience of being at the monument. Turbine 11 would, therefore, also have a significant impact on the monument's setting.

We recommend further design revision be used to relocate turbines 10 and 11 away from the key view along the main access of the cairn. We would be happy to review any further design changes if that would be helpful.

As we are planning to undertake a site visit in the near future it would be helpful if you could supply us with the most up to date site layout with clarified turbine numbering before we visit. Please also let us know of any information that we should be aware of ahead of the site visit.

We hope these comments are helpful. Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements who can be contacted by phone on 0131 668 8730 or by email on Victoria.Clements@hes.scot.



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Yours sincerely

Historic Environment Scotland

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To: [Nicola Ferguson](#)
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Date: 06 February 2024 14:03:14
Attachments: [231768eng_council_landscape_architect_02.02.2024.pdf](#)
[231768eng_council_archaeologist_27.01.2024.pdf](#)

OFFICIAL

Afternoon Nicola,

Further to the Council's previous consultation response of 7 November 2023 in connection with the above, please find attached responses from the Council's Archaeologist and Landscape Architect which, whilst belated, will hopefully prove to be useful to you.

Regards,

Robert

Robert Duncan

Team Leader (Major Developments)

Economy and Development

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Internal Memo

Economy and Resources – Development Planning

27 January 2024

To: Robert Duncan, Militia House, Dumfries

Your ref: 23/1786/ENQ

From: Andrew Nicholson, Archaeologist, Militia House, Dumfries

Our ref: EPCO/2024/Arch/DM

Request for Scoping Opinion

REQUEST FOR SCOPING OPINION UNDER ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017 FOR PROPOSED WIND FARM COMPRISING OF 22 WIND TURBINES (UP TO 250 METRES BASE TO TIP HEIGHT), WITH ASSOCIATED INFRASTRUCTURE INCLUDING ENERGY STORAGE SYSTEM AT BLAIR HILL WIND FARM, NEWTON STEWART. SCOTTISH GOVERNMENT CASE REF. ECU00004878: COMMENTS FROM COUNCIL ARCHAEOLOGY SERVICE

The application is for twenty-two turbines on open moorland and woodland to the north-east of Newton Stewart. The proposal is for turbines up to 250 m to turbine blade tip, with associated infrastructure.

It is confirmed that there is potential for a proposal of this nature to have a significant impact on cultural heritage assets and therefore potential effects will need to be assessed in an environmental impact assessment. Both direct and indirect effects will need to be assessed. Careful note should be taken of the following in respect of this assessment:

Planning Policy IN1: Wind Energy Development

The applicant should be aware of the statutory supplementary guidance Part 1 Wind Energy Development: Development Management Considerations, adopted February 2020 and the accompanying Dumfries and Galloway Wind Farm Landscape Capacity Study in appendix C.

It is advised that the landscape capacity study considered 'Settlement and Archaeology' as one of the landscape sensitivities informing the landscape capacity study and the resulting spatial framework.

In addition, Section H of the SPG contains guidance on Historic Environment and Cultural Heritage for all proposals that must be considered.

It is noted that the proposed turbines are 250m and therefore the assessment will have to consider effects of turbines of this scale. At such a height they are liable to have a widespread visibility within 10km of the site. A potentially wide effect on historic character can be anticipated. This should be assessed.

Impact Assessment

Generally, impacts on the setting of significant historic environment assets, should be led by the Zone of Theoretical Visibility (ZTV), with the greatest effects likely to be experienced by sites of national (note that not all are designated), or greater significance closest to the site.

A historic environment impact assessment should consider all direct impacts of the proposal including within the development site itself and any access routes. Indirect effects should also be considered. Nationally significant sites (Scheduled Monuments, Inventory Designed Landscapes, A-listed buildings and unscheduled sites considered by the local authority to be of national significance) out to 10km should be assessed, as well as regionally significant Non-Inventory Designed Landscapes, Archaeologically Sensitive Areas and Conservation Areas for which there are specific Council historic environment policies. Regionally significant historic assets out to 5km should also be assessed in cases such as burial cairns, hill top forts and settlements, or commemorative monuments, where their landscape setting is one of their key characteristics.

Non-Inventory Designed Landscapes should also be included as regional designations with respect to the LVIA assessment, in addition to Inventory Designed landscapes.

I have read the Scoping Report section on Cultural Heritage and Archaeology, and the appendices 6.1 and 6.2.

Examination of the Council's Historic Environment Record notes a significant number of historic assets within the footprint of the proposed development. Whilst the scoping report recommends a targeted site inspection I consider that, given the extensive and significant assets already known, and the lack of any recent survey, a comprehensive walkover survey should be undertaken at an early stage, along with other specialist surveys, in order to inform the layout and to achieve mitigation by avoidance wherever possible.

Survey and assessment for the proposal should also include the access route. Although it would appear to utilise many existing forestry roads these cut through a number of known assets and any scheme for improvement, such as widening, passing lanes or drainage, would also have the potential for direct impacts.

As with other sections of the report the second section of 6.3.4 concentrates on "designated heritage assets" even though it accepts, as shown in Table 6.1, that heritage assets that are considered by the Council's archaeology service to meet the criteria for designation have high cultural significance. The latter have all been identified through information supplied from the Council's Historic Environment Record (HER) and listed as such in Appendix 6.2. These should be subject to the same survey and assessment procedure as designated assets.

Information on the extent of and results from the walkover must be logged by the chosen archaeological contractor as an archaeological event via the online OASIS recording system. It would be helpful if the Council's Historic Environment Record could be provided with the final gazetteer of sites in digital format, along with corresponding GIS datasets for the location and extent of any identified assets, as well as the extent of the walkover. Examination of the

appendices indicates that the walkover was not confined to known sites, but it is important to know spatially which areas have been surveyed and which not.

Scottish Government remote sensing data should also be consulted in assessing historic environment assets within the footprint <https://remotesensingdata.gov.scot/>



Within the baseline description there is an image looking over the Cree valley from The Thieves standing stones. Whilst such views are **part** of the setting of the monument the modern approach to the stones is usually from the south or south-east, and, having taken guided walks around the area for the local walking festival, the reverse view is the one that is always selected for the taking of photographs. Setting for the monument includes how it is perceived in the present, and this significant view should not be ignored in any assessment.

The area is often used by local walkers and the approach is usually by the track that passes up through Drannadow farm. Views of the monuments looking towards the windfarm are therefore significant in relation to the modern

appreciation of the monuments and their setting and sense of place.

With regards to the views from Drumfire cairn and stone circle (SM1019) views towards the Drumfern cairn to the north (MDG2675), undesignated but assessed as being potentially of national significance, should be taken into account as well as those to the equally contemporary designated assets. Again there appears to be a stress on views away from the proposed development rather than those that lead into it.

With Napper's Cottage chambered cairn the same applies as that to The Thieves – the modern approach to the site is from the south and the initial appreciation of the site's setting is

looking northwards, into the development. Views from the Drumfern cairn noted above towards the assets should also be included in its assessment.

Terregan (MDG14810) and Threave (MDG15221) are farmsteads of regional significance. Their setting includes their location in marginal land, abandoned as climate change affected the sustainability of agriculture as well as population moves towards urban centres. The fact that the higher set farms are abandoned, but the lower ones continue in use is a significant element in understanding their function and their reason for subsequent abandonment.

The same applies to the farmstead of Knockbracks with its surrounding field system and enclosures, and a smaller farmstead to the south-west, on the southern slope of Glenmalloch Hill. These assets are assessed as potentially of national significance due to their good preservation, and due to Knockbracks, like Terregan, being depicted on the earliest mapping of the region suggesting potential medieval or earlier origins. Again their setting, on marginal hill land, is a significant element in understanding their function and their reason for subsequent abandonment.

I am mostly content with the list of cultural heritage assets that are proposed to be left out of the assessment. However I would wish to see the A-Listed Cumloden House included for assessment. The principal approach to the house is along the drive from the south and the first views of the house come from this approach. As set within its designed landscape, this is clearly the view of the house which was meant to be seen and appreciated first. As such it is highly significant to the setting of the building. The proposed scheme will form a backdrop to the house in this view and its impact on the setting of the house should be assessed accordingly.

A number of cultural heritage viewpoints are proposed, and wireframes for some provided. On the whole I am in agreement with the proposed viewpoints. As noted above I would wish to see an additional viewpoint from the drive looking towards Cumloden House, around NX 4180 6757. This should be a photomontage view.

Garlies Castle is set in mature deciduous woodland and has limited direct views up the hill. I do note and agree with the assessment of views along the track approaching the castle from the south-west. I would also wish for a viewpoint further along the track, after it passes through the boundary wall, at the site of the farmstead/fermtoun at NX 4191 6923 at the point where the medieval and post-medieval occupation



becomes visible within the landscape.

Policy

Key policy statements that have been issued by Scottish Government in relation to the historic environment are:

- Historic Environment Policy for Scotland (HEPS) 2019
- National Planning Policy 4 (2023)
- Managing Change in the Historic Environment: Setting 2016 (updated 2020)
- Environmental Impact Assessment Handbook SNH/HES 2018
- Planning Advice Note 2/2011 Planning and Archaeology

In addition to national policy the relevant Council policies covering the historic environment in this case are:

- Local Development Plan Policy HE1: Listed Buildings
- Local Development Plan Policy HE2: Conservation Areas
- Local Development Plan Policy HE3: Archaeology
- Local Development Plan Policy HE4: Archaeologically Sensitive Areas
- Local Development Plan Policy HE6: Gardens and Designed Landscapes

The Council's Supplementary Guidance on the Built Historic Environment should also be used to inform the cultural heritage impact assessment.

Cumulative effects will also need to be considered. The Planning case officer will confirm the developments that need to be considered.