

HISTORIC  
SCOTLAND



ALBA  
AOSMHOR

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22 October 2010

Dear Mr Quinn

**Environmental Impact Assessment (Scotland) Regulations 1999  
Proposed Kenly Wind Farm, Fife  
Scoping Opinion**

Thank you for your letter dated 17 September 2010 seeking comments/information on the above proposal. Our comments here concentrate on our statutory remit for scheduled monuments and their setting, category A listed buildings and their setting and gardens and designed landscapes appearing in the Inventory.

Please seek information and advice from the relevant Council's archaeological and conservation service on unscheduled archaeology and category B and C(S) listed buildings. The relevant Council's archaeological and conservation service will also be able to advise on the historic environment and of the likely impacts for any sites of regional and local importance.

**Proposed Development**

The proposal consists of 4 or 6 wind turbines, associated cables, substation, transformers and access tracks. Two alternative layouts have been developed using turbine heights of 100m and 125m to blade tip.

**Our Views on the Principle of this Proposal**

On the basis of the information supplied, we have concerns about the potential adverse impact of this development proposal on assets within our statutory remit. In particular, this relates to the potential impact on the setting of St Andrews Cathedral (Index no. 90260) and St Andrews Castle (Index no. 90259). In addition, it is considered that there maybe an indirect impact on other historic environment assets in the surrounding area which are listed below, therefore, the Environmental Statement (ES) should also assess the level of impact on these assets. I welcome the production of a Zone of Theoretical Visibility (ZTV) analysis to provide a basis for

assessing the potential impact on the setting of these assets and those in the wider area.

### **Potential Direct Impacts**

I can confirm that there are no scheduled monuments, category A listed buildings or gardens or designed landscapes within the search area.

### **Potential Indirect Impacts**

The following scheduled monuments/category A listed buildings/gardens and designed landscapes are located in the surrounding area and should be considered in terms of potential impact on their setting:

#### *Scheduled Monuments*

- Kingsbarns Castle, 700m NE of Kingsbarns (Index no. 7691)
- Peekie Bridge, bridge over Kerly Water 50m E of Peekie Mill (Index no. 880)
- Hill of Tarvit, homestead & terraces 550m SSW of Hilltarvit Mains (Index no. 4749)
- Drumcarrow Craig, broch (Index no. 808)
- St Andrews Cathedral and adjacent ecclesiastical remains (Index no. 90260)
- St Andrews Castle (Index no. 90259)
- Kittock's Den, fort (Index no. 10437)
- West Pitcorthie, standing stone 225m NE of (Index no. 10439)
- Pittarthis Castle (Index no. 870)

#### *Category A Listed Buildings*

- Kenlygreen House (HB no. 15841)
- Kellie Castle (HB no. 2519)
- St Andrews Cathedral, St Rule's Church and St Rule's Tower (HB no. 40588)
- Balcaskie House (HB no. 2503)

#### *Gardens and Designed Landscapes (GDL)*

- Cambo
- Kellie Castle
- Balcaskie
- St Andrews Links

Any ES to be produced for this development should consider impacts upon these assets and any others in the wider area which may experience significant impacts. It would be helpful if such an analysis contained appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings, illustrating views both towards and from the proposed development. Visualisations are of particular importance for St Andrews Castle (Index no. 90259), St Andrews Cathedral (Index no. 90260), Kenlygreen House (HB no. 15841) and Cambo GDL.

St Andrews Cathedral is of unquestionable significance as the centre of pre-Reformation ecclesiastical life in Scotland. It is located in a dominant position

overlooking the burgh of St Andrews, and it has key outward views towards the W over the town. Key approaches are from the NW, where the cathedral is prominent on the skyline of the town, and from the S.

St Andrews Castle was built to house the bishops of St Andrews, and as such the castle and cathedral are intrinsically linked. It is located on the cliffs on the northern side of St Andrews, and has a subservient relationship to the cathedral. Bishop Roger de Beaumont (1189-1202) built the earliest known castle, and he also built St Rules Tower (at St Andrews Cathedral), and the two of these together were important symbols of Episcopal authority as imposed on existing groups of celtic clergy at Kilrymont (the presumed earlier royal residence in the vicinity of St Andrews).

When looking towards St Andrews Cathedral from St Andrews Castle, in the manner that the subservient residence would look towards the dominant cathedral, there is the potential that the proposed turbines will be prominent in the background of the view. This could compromise the dominance of the cathedral in that view. It is therefore crucial that any ES contains a photomontage showing the cathedral when viewed from the seaward part of the castle. In addition, the ES should contain a photomontage showing the view towards the turbines from the top of St Rules Tower – it is important for us to assess how the turbines impact upon wider landscape views.

Kenlygreen House (HB no. 15841) dates to the late 18<sup>th</sup> century. Given the proximity of this property to the proposed wind farm, the topography and the lack of trees in this area, it is likely that this property will be affected by the proposals. As such, this asset should be included as part of the assessment.

Cambo GDL is located approx 2.5 km E of the proposed wind farm site. The designed landscape and model farm policies extend along the Forth shore, on a coastal terrace, cut by a lowland den formed by the Cambo Burn. Views from the house extend SW over open parkland with significant mature specimen trees; and according to the Inventory, other views across the policies are now obscured by mature tree cover. As such, it is likely that although the turbines may be visible from parts of the designed landscape, the wind farm will not feature in important views and will be largely screened by woodland. However we await further information before reaching a final view. A wireframe / photomontage showing the view towards the wind farm from the house and core policies would be of particular use.

Kellie Castle GDL is located approx 6.7 km SW of the proposed wind farm. The landscape surrounding Kellie Castle is low lying and gently undulating, sloping towards the coast to the south and the Castle sits to the south of Kellie Law, a small hill rising to 182m (597 feet). The Castle is well protected by shelterbelts to the north, east and west, which screen it from view. According to the Inventory, the views from the Castle are focused south across the Firth of Forth to the Bass Rock and beyond to the Pentland Hills (in the opposite direction to the wind farm). As such, there is the potential for the intervening topography, woodland screening and the orientation of

the policies to reduce the visual impact on this asset. However, we would still request that the ES contains an assessment of the potential impact.

Balcaskie GDL is located approx 6.5 km SW of the proposed development. Balcaskie was designed to face SE so that the axial vista centred on the house lined up with the Bass Rock in the Firth of Forth. This axis runs through the house and on the N side is picked up by an avenue running NW which is almost centred on Kellie Law. The designed landscape was carefully laid out to use these distinctive landmarks. We would request that the ES assess the potential impact on this asset.

St Andrews Links GDL is located approx 7.5 km NW of the wind farm site. According to the Inventory there are uninterrupted views from all the courses eastwards to St Andrews Bay and southwards to the town – in the direction of the wind farm. We would request that the ES assess the potential impact on this asset.

In addition to the above, the ES should also address the potential for cumulative impacts on historic environment assets, which could arise from this development in combination with other wind farms in the vicinity. This should assess the incremental impact or change when the proposal is combined with other past, present and reasonably foreseeable developments.

I would be keen to meet with you to discuss the proposals and assessments as they progress. I have attached some general principles which I hope you find helpful. Please also refer to the advice contained in our setting annex and the technical guidance note on setting. These documents are available at:

[http://www.historic-scotland.gov.uk/scoping\\_of\\_development\\_proposals\\_2009.pdf](http://www.historic-scotland.gov.uk/scoping_of_development_proposals_2009.pdf).

<http://www.historic-scotland.gov.uk/managing-change-consultation-setting.pdf>

Please do not hesitate to contact me should you wish to discuss any of the issues raised in this letter.

Yours sincerely



**Robin Campbell**  
Senior Development Assessment (EIA) Officer

## GENERAL PRINCIPLES

### Getting Started

Historic environment issues should be taken into consideration as part of the site selection process and alternatives considered. We recommend that the developer engages archaeological/historic environment consultants to assess impacts on the historic environment and on appropriate mitigation strategies to address any adverse impacts. A desk-based assessment of existing historic environment records and other sources of information should be used to gather baseline information. This should identify the site and setting of the historic environment assets, both within the boundary of the development area, and within the identified Zone of Visual Influence (ZVI). The ZVI may be helpful in giving initial consideration to setting issues and should include information on scheduled monuments, archaeological sites and landscapes, listed buildings, gardens and designed landscapes and conservation areas. We recommend that a non-invasive walkover survey is undertaken to assess the area's potential for the discovery of unrecorded archaeology. The relevant Council Archaeological Service will be able to advise further on this.

### Pastmap

Information on the location of all historic environment assets can be obtained from PASTMAP at: <http://www.pastmap.org.uk> This is a free, interactive website produced jointly by ourselves and the Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS) and allows anyone with internet access to display and search data on Scotland's historic environment.

### Definition of the Historic Environment

Scottish Historic Environment Policy (SHEP) (Chapter 1) provides a useful definition of the historic environment. It defines that the historic environment encompasses built heritage features (ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes and marine heritage) and the context or setting in which they sit, and the patterns of past use, in landscapes and within the soil, and also in our towns, villages and streets. It also recognises that the historic environment has less tangible aspects including the historical, artistic, literary, linguistic and scenic associations of places and landscapes.

### National Policy for the Historic Environment

- Scottish Planning Policy (SPP) at: [Scottish Planning Policy](#)
- The Scottish Historic Environment Policy(SHEP) sets out Scottish Ministers strategic policies for the historic environment and can be found at: <http://www.historic-scotland.gov.uk/index/heritage/policy/shep.htm>
- Technical Guidance Note on Setting at: <http://www.historic-scotland.gov.uk/managing-change-consultation-setting.pdf>