

Technical Appendix 5.1: Cultural Heritage Assessment Methodology

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1.1 Introduction

- 1.1.1 This Technical Appendix describes the assessment methodology for the cultural heritage assessment of potential physical and setting impacts as a result of the Proposed Development.
- 1.1.2 The Proposed Development is a renewable energy development comprised of up to eight wind turbines, a Battery Energy Storage System (BESS) and associated infrastructure adjacent to Sullom Voe Oil Terminal (SVT) and the Shetland Gas Plant in Shetland, Scotland. The assessment is based on the Proposed Development as described in **Chapter 2: Proposed Development (EIAR Volume 2)**.

1.2 Government and Local Planning Policies and Guidance

Legislative Framework

- 1.2.1 The statutory framework for heritage in Scotland is outlined in the Town and Country Planning (Scotland) Act 1997¹, as amended in the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997² and the Ancient Monuments and Archaeological Areas Act 1979³, both of which are modified by the Historic Environment (Amendment) (Scotland) Act 2011⁴.

National Planning Policy

- 1.2.2 The implications of these Acts with regard to planning policy and other relevant policy are described within National Planning Framework 4 (NPF4)⁵, and Historic Environment Policy for Scotland (HEPS)⁶.
- 1.2.3 The stated intent of NPF4 Policy 7: Historic Assets and Places is:
To protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places⁷.
- 1.2.4 The following sections of Policy 7 are relevant to this assessment:

Policy 7a)

Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change.

Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.

Policy 7c)

Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.

Policy 7h)

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.*

Policy 7i)

Development proposals affecting nationally important Gardens and Designed Landscapes will be supported where they protect, preserve or enhance their cultural significance, character and integrity and where proposals will not significantly impact on important views to, from and within the site, or its setting.

Policy 7o)

Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment.

Where impacts cannot be avoided they should be minimised. Where it has been demonstrated that avoidance or retention is not possible, excavation, recording, analysis, archiving, publication and activities to provide public benefit may be required through the use of conditions or legal/planning obligations.

When new archaeological discoveries are made during the course of development works, they must be reported to the planning authority to enable agreement on appropriate inspection, recording and mitigation measures⁷

- 1.2.5 HEPS was published by Historic Environment Scotland (HES) in 2019 and sets out the Scottish Government’s policy for decision making that affects the historic environment. It contains six policies for managing change in the historic environment, all of which favour protection, understanding and promotion of the historic environment as well as the preservation of the benefits of the historic environment for future generations. Of particular relevance to this assessment, HEP3 and HEP4 both state “if detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be in place”⁸. The following HEPS policies are relevant to this assessment:

HEP2

Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.

HEP3

Plans, programmes, policies and strategies and the allocation of resources should be approached in a way that protects and promotes the historic environment.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored and mitigation measures should be put in place.

¹ Town and Country Planning (Scotland) Act (1997) (c8). London: UK Government. Available at: <https://www.legislation.gov.uk/ukpga/1997/8/contents> (Accessed 27/01/2026).

² Planning (Listed Buildings and Conservation Areas) (Scotland) Act (1997) (c9). London: UK Government. Available at: <https://www.legislation.gov.uk/ukpga/1997/9/contents> (Accessed 27/01/2026).

³ Ancient Monuments and Archaeological Areas Act (1979) (c46). London: UK Government. Available at: <https://www.legislation.gov.uk/ukpga/1979/46> (Accessed 27/01/2026).

⁴ Historic Environment (Amendment) (Scotland) Act (2011) (c3). London: UK Government. Available at: <https://www.legislation.gov.uk/asp/2011/3/contents> (Accessed 27/01/2026).

⁵ Scottish Government (2023). National Planning Framework 4. Available at: <https://www.gov.scot/publications/national-planning-framework-4/> (Accessed 27/01/2026).

⁶ Historic Environment Scotland (HES) (2019). Historic Environment Policy for Scotland. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=1bcfa7b1-28fb-4d4b-b1e6-aa2500f942e7> (Accessed 27/01/2026).

⁷ Scottish Government (2023). National Planning Framework 4. Available at: <https://www.gov.scot/publications/national-planning-framework-4/> (Accessed 27/01/2026), 45-47.

⁸ Historic Environment Scotland (HES) (2019). Historic Environment Policy for Scotland. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=1bcfa7b1-28fb-4d4b-b1e6-aa2500f942e7> (Accessed 27/01/2026), 9.

HEP4

Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

HEP5

Decisions affecting the historic environment should contribute to the sustainable development of communities and places⁸.

Local Plan

- 1.2.6 Local Plans contain the Local Authority policies for land-use and development control across a district. The Shetland Islands Council (SIC) Local Development Plan was adopted in September 2014⁹ and includes the following policies relevant to this assessment:

HE1 Historic Environment

The Council should presume in favour of the protection, conservation and enhancement of all elements of Shetland’s historic environment, which includes buildings, monuments, landscapes and areas.

The historic environment includes ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, gardens and designed landscapes and our marine heritage. The context and setting of historic features in the landscape and the patterns of past use are also part of the historic environment.

The historic environment is a key part of Shetland’s cultural heritage, enhancing regional and local distinctiveness and providing a sense of identity and continuity for communities. It contributes to economic growth, and can act as a catalyst for successful regeneration and community-building. It also contributes to sustainable development through the energy and material invested in older buildings, and their scope for adaptation and re-use.

HE2 Listed Buildings

Development affecting a listed building, or its setting, should preserve the building, its setting, and any features of special architectural or historic interest that it possesses.

The layout, design, materials, scale, siting and use of any development should be appropriate to the character and appearance of the listed building and its setting.

Proposals for the total or substantial demolition of a listed building should only be supported where it can clearly be demonstrated that every effort has been made to retain it.

Listing is the process that identifies, designates and provides statutory protection for buildings of special architectural or historic interest. In assessing applications under the Planning (Scotland) Acts that affect a listed building the planning authority is required to have special regard to the desirability of preserving the building, or its setting, or any features of special architectural or historic interest that it possesses.

Once lost, listed buildings cannot be replaced; they can be robbed of their special interest either by inappropriate alteration or by demolition. Therefore there is a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting.

HE4 Archaeology

Scheduled monuments, designated wrecks and other identified nationally important archaeological resources should be preserved in situ, and within an appropriate setting. Developments that have an

adverse effect on scheduled monuments and designated wrecks or the integrity of their settings should not be permitted unless there are exceptional circumstances.

All other significant archaeological resources should be preserved in situ wherever feasible. Where preservation in situ is not possible the planning authority should ensure that developers undertake appropriate archaeological excavation, recording, analysis, publication and archiving in advance of and/or during development.

Scheduled monuments are archaeological sites, buildings or structures of national or international importance. Where works requiring consent under the Planning (Scotland) Acts affect a scheduled monument, the protection of the monument and its setting are important considerations.

Archaeological sites and monuments are important and finite resources that have the potential to increase our knowledge of the past, and should be protected and preserved in situ wherever feasible. The planning authority should consider the presence and potential presence of archaeological assets when making decisions on planning applications. Where preservation in situ is not possible the planning authority should ensure that developers undertake appropriate excavation and/or recording of the site¹⁰.

Setting Guidance

- 1.2.7 NPF4 defines setting as:
- Setting is more than the immediate surroundings of a site or building, and may be related to the function or use of a place, or how it was intended to fit into the landscape or townscape, the view from it or how it is seen from areas round about, or areas that are important to the protection of the place, site or building.*
- ‘Setting’ is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced¹¹.*

- 1.2.8 The HES setting guidance sets out the ways in which setting may contribute to the value of a heritage asset. It advocates a three-stage approach to assessing impacts upon setting which comprises:
- *Stage 1: identify the historic assets that might be affected by the proposed development;*
 - *Stage 2: define and analyse the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced; and*
 - *Stage 3: evaluate the potential impact of the proposed changes on the setting, and the extent to which any negative impacts can be mitigated¹².*

Public Benefit

- 1.2.9 NPF4 Policy 7 describes the requirement for public benefit when there will be impacts upon the historic environment as a result of development proposals. Policy 7o where impacts to heritage assets cannot be avoided states that “excavation, recording, analysis, archiving, publication and activities to provide public benefit may be required through the use of conditions or legal/planning obligations”⁷.
- 1.2.10 HEPS policies 1-5 also indicate how the historic environment can make a positive economic, social and/or environmental impact, through information dissemination, the promotion of information, the exchange of ideas, programmes of enhancement and enabling communities to engage with the historic environment⁶.
- 1.2.11 Historic Environment Scotland (HES) published Our Past, Our Future in 2023. The five-year strategy sets out three priorities to meet the mission statement “...to sustain and enhance the benefits of

⁹ Shetland Islands Council (2014). *Shetland Local Development Plan*. Available at: <https://www.shetland.gov.uk/development-plans-policy/development-plans> (Accessed 27/01/2026).

¹⁰ Shetland Islands Council (2014). *Shetland Local Development Plan*. Available at: <https://www.shetland.gov.uk/development-plans-policy/development-plans> (Accessed 27/01/2026), 31-34.

¹¹ Scottish Government (2023). *National Planning Framework 4*. Available at: <https://www.gov.scot/publications/national-planning-framework-4/> (Accessed 27/01/2026), 156.

¹² HES (2020a). *Managing Change in the Historic Environment: Setting*. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549> (Accessed 27/01/2026), 8.

Scotland’s historic environment, for people and communities now and into the future”. Heritage assets have value in the sense that they can “...create spaces for recreation, leisure, tourism, and education, or places for nature to thrive” and “can be a source of identity, a resource for learning, or a spark for creativity”¹³ and thus can be utilised to provide programmes of public benefit as required by NPF4. Guidance from the Chartered Institute for Archaeologists (CIfA)¹⁴ and The Association of Local Government Archaeological Officers (ALGAO)¹⁵ have also noted the need for public benefit or public engagement in archaeology.

1.3 Study Areas

- 1.3.1 In order to assess the potential for effects on cultural heritage assets resulting from the Proposed Development, the following Study Areas have been identified:
- A Core Study Area (the Site), which includes all land within the Site (as defined by the application boundary on **Figure 2.1: Site Layout (EIAR Volume 3a)**), which will be subject to assessment for potential physical and setting effects;
 - A 1 km Study Area, including land within 1 km of the initial Site boundary used for the Scoping assessment, which has been used for the identification of all known heritage assets and known previous archaeological interventions (events) in order to help predict whether any similar hitherto unknown archaeological remains are likely to survive within the Site and thus be impacted by the Proposed Development;
 - A 5 km Study Area, including land within 5 km of the initial Site boundary used for the Scoping assessment, which has been used for the assessment of potential impacts on the settings of all designated heritage assets including World Heritage Sites, Scheduled Monuments, Listed Buildings, Inventoried Gardens and Designed Landscapes, Inventoried Battlefields, and Conservation Areas; and
 - A 10 km Study Area, including land within 10 km of the initial Site boundary used for the Scoping assessment, which has been used for the assessment of potential impacts on the settings of all nationally important heritage assets including World Heritage Sites, Scheduled Monuments, Category A Listed Buildings, Inventoried Gardens and Designed Landscapes, and Inventoried Battlefields.
- 1.3.2 The Study Areas described above used for establishing the historic baseline and the walkover survey are based on an earlier version of the application boundary which has subsequently been reduced following environmental assessments and design refinement.

1.4 Baseline Conditions

Desk Study

- 1.4.1 The archaeological and historical baseline has been established with reference to the following information sources:
- HES for designated heritage asset data held in the National Record for the Historic Environment (NRHE);

- The SIC Historic Environment Record (HER), formerly known as the Sites and Monuments Record (SMR), for records of designated and non-designated assets and previous archaeological interventions;
 - Historic Maps held by the National Library of Scotland (NLS)¹⁶ and the British Library (via Old Maps Online¹⁷ and Wikimedia Commons¹⁸);
 - Archaeology Data Service (ADS)¹⁹ for heritage data including grey literature reports, archaeological journals, and the Excavation Index for Scotland;
 - Aerial photography images from the National Collection of Aerial Photography (NCAP)²⁰ website and the Cambridge Collection of Aerial Photography (CUCAP)²¹ website;
 - Google Earth Pro™ for current and historical satellite imagery of the Site;
 - British Geological Survey²² data for information about the geological character of the Site;
 - The Scottish Archaeological Research Framework (ScARF) for national research frameworks and chronological reports²³;
 - Shetland Museum and Archives for any available pre-Ordnance Survey mapping, photographs, and other documentary sources; and
 - Any other relevant published works, such as previous archaeological reports and assessments.
- 1.4.2 The Shetland Museum and Archives was visited on 27 March 2025 for any available pre-Ordnance Survey mapping and other documentary sources.

Field Surveys

- 1.4.3 A walkover survey of the Site and surrounding area were undertaken to investigate the condition and significance of known archaeology on the Site.
- 1.4.4 An initial site visit was undertaken in June 2024 in order to understand the layout of the Site and for initial consideration of key constraints.
- 1.4.5 The walkover survey was undertaken in March 2025 by two archaeologists walking in transects across the Site. The entire Site was covered, though the focus was on areas likely to be used for proposed infrastructure or habitat/ecological enhancement. The aim of the survey was to assess the significance and extent of remains identified through desk-based assessment and previous works and to identify any hitherto unrecorded remains that might be present within the Proposed Development footprint.
- 1.4.6 A further survey was undertaken in September 2025 with representatives from HES and the client in order to discuss the potential setting impacts which could result from the Proposed Development.
- 1.4.7 The Zone of Theoretical Visibility (ZTV) was used to identify those assets within the Study Areas with potential visibility of the Proposed Development. Where possible, these assets were then visited between 24 and 27 March 2025 in order to assess the setting of the assets and confirm the potential for setting impacts.
- 1.4.8 Photographs taken during the surveys are presented in **Technical Appendix 5.5: Plates (EIAR Volume 4)**.

¹³ HES (2023a). *Our Past, Our Future: The Strategy for Scotland’s Historic Environment*. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=79204155-9eb2-4d29-ab14-aff200ec2801> (Accessed 27/01/2026), 10-18.

¹⁴ Chartered Institute for Archaeologists (CIfA) (2021). *Professional Practice Paper: Delivering Public Benefit*. Available at: https://www.archaeologists.net/sites/default/files/2024-11/CIfA-Delivering-Public-Benefit_2021.pdf (Accessed 27/01/2026).

¹⁵ Mann, B. (2023). *Delivery of Public Benefit and Social Value Guidance for Archaeology and the Planning Process*. Available at: https://algao.org.uk/sites/algao.org.uk/files/2023-02/ALGAO_Delivery_of_Public_Benefit_Social_Value_Guidance.pdf (Accessed 27/01/2026).

¹⁶ National Library of Scotland (NLS) (2026). *Map Images*. Available at: <https://maps.nls.uk/> (Accessed 27/01/2026).

¹⁷ Old Maps Online (2026). *Explore Maps*. Available at: <https://www.oldmapsonline.org/> (Accessed 27/01/2026).

¹⁸ Wikimedia Commons (2020). *Old Maps of Shetland Islands*. Available at: https://commons.wikimedia.org/wiki/Category:Old_maps_of_the_Sh‎‎etland_Islands (Accessed 28/01/2026).

¹⁹ Archaeology Data Service (ADS) (2026). *Search data*. Available at: <https://archaeologydataservice.ac.uk/search-data/> (Accessed 28/01/2026).

²⁰ National Collection of Aerial Photography (NCAP) (2026). *Map Search*. Available at: <https://ncap.org.uk/search?view=map> (Accessed 27/01/2026).

²¹ University of Cambridge (2026). *Cambridge University Collection of Aerial Photography (CUCAP)*. Available at: <https://www.cambridgeairphotos.com/> (Accessed 27/01/2026).

²² British Geological Survey (BGS) (2026). *Geology of Britain Viewer*. Available at: <https://geologyviewer.bgs.ac.uk/> (Accessed 27/01/2026).

²³ Scottish Archaeological Research Framework (ScARF) (2026). *Panel Reports and Chronology*. Available at: <https://scarf.scot/national/panel-report-chronology-and-downloads/> (Accessed 28/01/2026).

1.5 Assessment of Potential Significant Effects

1.5.1 The assessment distinguishes between the terms ‘impact’ and ‘effect’. An impact is defined as a physical change to a heritage asset or its setting, whereas an effect refers to the significance of this impact. The first stage of the assessment involves establishing the importance of the heritage asset and assessing the sensitivity of the asset to change (impact). Using the proposed design for the Proposed Development, an assessment of the impact magnitude is made and a judgement regarding the level and significance of effect is arrived at.

Sensitivity Criteria

- 1.5.2 The definition of cultural significance is readily accepted by heritage professionals both in the UK and internationally and was first fully outlined in the Burra Charter, which states in Article One that ‘cultural significance’ or ‘cultural heritage value’ means aesthetic, historic, scientific, social or spiritual value for past, present or future generations²⁴. This definition has since been adopted by heritage organisations around the world, including HES. HEPS notes that to have cultural significance an asset must have a particular “*aesthetic, historic, scientific or social value for past, present and future generations*”⁸. Heritage assets also have value in the sense that they “*...create spaces for recreation, leisure, tourism, and education, or places for nature to thrive*” and “*can be a source of identity, a resource for learning, or a spark for creativity*”¹⁸.
- 1.5.3 All heritage assets have significance; however, some heritage assets are judged to be more important than others. The level of that importance is, from a cultural resource management perspective, determined by establishing the asset’s capacity to contribute to our understanding or appreciation of the past⁸. In the case of many heritage assets their importance has already been established through the designation (i.e. Scheduling, Listing and Inventory) processes applied by HES.
- 1.5.4 The rating of importance of heritage assets is first and foremost made in reference to their designation. For non-designated assets importance is assigned based on professional judgement and guided by the criteria presented in **Table 5.1.1**; which itself relates to the criteria for designations as set out in Designation Policy and Selection Guidance²⁵ and Scotland’s Listed Buildings²⁶.

Table 5.1.1: Criteria for Establishing Importance of Heritage Assets – TA Chapter	
Importance	Receptors
Very High	World Heritage Sites (as protected by NPF4 ⁵); Other designated or non-designated heritage assets with demonstrable Outstanding Universal Value ²⁷ .
High	Scheduled Monuments (as protected by the Ancient Monuments and Archaeological Areas Act 1979) ³ ; Category A Listed Buildings (as protected by the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997) ² ; Inventory Gardens and Designed Landscapes (as protected by the 1979 Act ³ , as amended by the Historic Environment (Amendment) (Scotland) Act 2011) ⁴ ; Inventory Battlefields (as protected by the 1979 Act ³ , as amended by the 2011 Act) ⁴ ; Outstanding examples of some period, style or type; Non-designated assets and/or Locally Listed assets considered to meet the criteria for the designations as set out above (as protected by NPF4 ⁷).
Medium	Category B and C Listed Buildings (as protected by the 1997 Act ²); Conservation Areas (as protected by the 1997 Act ²); Major or representative examples of some period, style or type; or

Table 5.1.1: Criteria for Establishing Importance of Heritage Assets – TA Chapter	
Importance	Receptors
	Non-designated assets and/or Locally Listed assets considered to meet the criteria for the designations as set out above (as protected by NPF4 ⁷)
Low	Locally Listed assets; Examples of any period, style or type which contribute to our understanding of the historic environment at the local level.
Negligible	Relatively numerous types of features; Findspots of artefacts that have no definite archaeological remains known in their context.

- 1.5.5 Determining cultural heritage significance can be made with reference to the intrinsic, contextual and associative characteristics of an asset as set out in HEPS⁸ and its accompanying Designation Policy and Selection Guidance²⁵. The Designation Policy and Selection Guidance indicates that the relationship of an asset to its setting or the landscape makes up part of its contextual characteristics. HES’s Managing Change Guidance, in defining what factors need to be considered in assessing the impact of a change on the setting of a historic asset or place, states that the magnitude of the proposed change should be considered “*relative to the sensitivity of the setting of an asset*”¹², thereby making clear that assets vary in their sensitivity to changes in setting and thus have a relative sensitivity. The EIA Handbook suggests that cultural significance aligns with sensitivity but also states that “*the relationship between value and sensitivity should be clearly articulated in the assessment*”²⁸. It is therefore recognised that the importance of an asset is not the same as its sensitivity to changes to its setting²⁸. Elements of setting may make a positive, neutral, or negative contribution to the significance of an asset. Thus, in determining the nature and level of effects upon assets and their settings by the development, the contribution that setting makes to an asset’s significance and thus its sensitivity to changes to setting need to be considered.
- 1.5.6 This approach recognises the importance of avoiding significant adverse impacts on the integrity of the setting of an asset in the context of the contribution that setting makes to the understanding, appreciation and experience of a given asset. It recognises that setting is a key characteristic in understanding and appreciating some, but by no means all, assets. Indeed, assets of High or Very High importance do not necessarily have high sensitivity to changes to their settings (e.g. do not necessarily have a high relative sensitivity). An asset’s relative sensitivity to alterations to its setting refers to its capacity to retain its ability to contribute to an understanding and appreciation of the past in the face of changes to its setting. The ability of an asset’s setting to contribute to an understanding, appreciation and experience of it and its significance also has a bearing on the sensitivity of that asset to changes to its setting. While heritage assets of High or Very High importance are likely to be sensitive to physical impacts, not all will have a similar sensitivity to impacts on their setting; this would be true where setting does not appreciably contribute to their significance. HES’s guidance on setting makes clear that the level of effect may relate to “*the ability of the setting [of an asset] to absorb new development without eroding its key characteristics*”¹². Assets with Very High or High relative sensitivity to settings impacts may be vulnerable to any changes that affect their settings, and even slight changes may erode their key characteristics or the ability of their settings to contribute to the understanding, appreciation and experience of them. Assets whose relative sensitivity to changes to their setting is lower may be able to accommodate greater changes to their settings without having key characteristics eroded.
- 1.5.7 The criteria used for establishing an asset’s relative sensitivity to changes to its setting is detailed in **Table 5.1.2**. This table has been developed based on AOC Archaeology Group’s professional judgement

²⁴ International Council on Monuments and Sites (ICOMOS) (2013). *Burra Charter Article 1.2*. Available at: <https://australia.icomos.org/publications/burra-charter-practice-notes/> (Accessed 27/01/2026).

²⁵ HES (2020b). *Designation Policy and Selection Guidance*. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=8d8bbaeb-ce5a-46c1-a558-aa2500ff7d3b> (Accessed 27/01/2026).

²⁶ HES (2021). *Scotland’s Listed Buildings*. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44> (Accessed 27/01/2026).

²⁷ Outstanding Universal Value is defined by UNESCO as ‘Outstanding Universal Value means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity.’ UNESCO 2025. *Operational Guidelines for the Implementation of the World Heritage Convention*. Available at: <https://whc.unesco.org/en/guidelines/>. (Accessed 23/03/2026), 24.

²⁸ HES and Scottish Natural Heritage (SNH) (2018). *Environmental Assessment Handbook*. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0> (Accessed 27/01/2026), 181-184.

and experience in assessing setting effects. It has been developed with reference to the policy and guidance noted above including NPF4⁵, HEPS⁶ and its Designation Policy and Selection Guidance²⁵, the Xi'an Declaration²⁹, the EIA Handbook²⁸, and HES's guidance on the setting of heritage assets¹².

Table 5.1.2: Criteria for Establishing Relative Sensitivity of a Heritage Asset to Changes to its Setting	
Sensitivity	Criteria
Very High	An asset, the setting of which is critical to understanding, appreciation and experience of it, should be thought of as having Very High Sensitivity to changes to its setting. This is particularly relevant for assets whose settings, or elements thereof, make an essential direct contribution to their cultural significance.
High	An asset, the setting of which makes a major contribution to understanding, appreciation and experience of it, should be thought of as having High Sensitivity to changes to its setting. This is particularly relevant for assets whose settings, or elements thereof, contribute substantially to their cultural significance.
Medium	An asset, the setting of which makes a moderate contribution to an understanding, appreciation and experience of it, should be thought of as having Medium Sensitivity to changes to its setting. This could be an asset for which setting makes a contribution to significance but whereby its value is derived mainly from its other characteristics (see HES 2020a for discussion of intrinsic, contextual and associative characteristics which may contribute to overall cultural significance) ¹² .
Low	An asset, the setting of which makes some contribution to understanding, appreciation and experience of it, should generally be thought of as having Low Sensitivity to changes to its setting. This may be an asset whose value is predominantly derived from its other characteristics (see HES 2020a for discussion of intrinsic, contextual and associative characteristics which may contribute to overall cultural significance) ¹² .
Negligible	An asset whose setting makes minimal contribution to understanding, appreciation and experience of it should generally be thought of as having Negligible Sensitivity to changes to its setting.

1.5.8 The determination of a heritage asset’s relative sensitivity to changes to its setting is first and foremost reliant upon the determination of its setting and the key characteristics of setting which contribute to its cultural significance and an understanding and appreciation of that cultural significance. This aligns with Stage 2 of the HES guidance on setting¹². The criteria set out in **Table 5.1.2** are intended as a guide. Assessment of individual heritage assets is informed by knowledge of the asset itself; of the asset type (if applicable) and by site visits to establish the current setting of the assets. This allows for the use of professional judgement, and each asset is assessed on an individual basis.

Magnitude of Impact Criteria

1.5.9 Potential impacts, that is the physical change to known heritage assets, and unknown buried archaeological remains, or changes to their settings, in the case of the Proposed Development relate to the possibility of disturbing, removing or destroying in situ remains and artefacts during the construction phase or the placement of new features within their setting during the operational phase.

1.5.10 The EIA Handbook notes that “*In the context of cultural heritage impact assessment, the receptors are the heritage assets and impacts will be considered in terms of the change in their cultural significance*”²⁸. Physical changes to assets during the construction phase will relate to the physical removal or damage (in part or whole) to a heritage asset and will therefore likely be adverse. However, the EIA Handbook states that “*When considering setting impacts, visual change should not be equated directly with adverse impact. Rather the impact should be assessed with reference to the degree that the proposal affects those aspects of setting that contribute to the asset’s cultural significance*”²⁸. It further indicates that magnitude of impact should largely be regarded in the context of impacts to “*elements of the fabric or setting of the heritage asset that contribute to its cultural significance*”²⁸. It is further of note that the EIA handbook states that “*Change in the setting of an asset may be entirely neutral in terms of the resultant change in the asset’s cultural significance, but this will rarely be the case where the actual fabric is affected*”²⁸.

1.5.11 On this basis, the magnitude of the impacts upon heritage assets caused by the Proposed Development is rated using the classifications and criteria outlined in **Table 5.1.3**. These criteria consider the extent of change which could be anticipated as a result of the Proposed Development in the context of the significance of the asset, including any contribution made by setting.

Table 5.1.3: Criteria for Classifying Magnitude of Impact	
Magnitude of Impact	Criteria
High	Substantial loss of information content resulting from total or large-scale removal of deposits from an asset to the extent that it would result in a substantial loss of cultural significance; Major alteration of an asset’s baseline setting, which materially compromises the ability to understand, appreciate and experience the contribution that setting makes to the significance of the asset and erodes the key characteristics of the setting to the extent that it would result in substantial loss of cultural significance.
Medium	Loss of information content resulting from material alteration of the baseline conditions by removal of part of an asset that would lead to some loss of cultural significance; Alteration of an asset’s baseline setting that affects the ability to understand, appreciate and experience the contribution that setting makes to the significance of the asset to a degree but whereby the cultural significance of the monument in its current setting remains understandable. The key characteristics of the setting may be partially eroded; there would be some loss of cultural significance.
Low	Detectable impacts leading to minor alteration to baseline conditions by removal of a small proportion of the asset, that would lead to slight loss of cultural significance; Alterations to the asset’s baseline setting, which do not affect the ability to understand, appreciate and experience the contribution that setting makes to the asset’s overall significance and would only lead to slight loss of cultural significance. Key characteristics would not be eroded.
Negligible	Loss of a small percentage of the area of an asset’s peripheral deposits/fabric that would leave cultural significance unchanged; A reversible alteration to the fabric of the asset; A marginal alteration to the asset’s baseline setting that would leave cultural significance of the asset unchanged.
None	No impact predicted

1.5.12 In line with HES guidance on setting, factors which will be considered in coming to a judgement regarding magnitude of setting impact will include, but not be limited to:

- *whether key views to or from the historic asset or place are interrupted;*
- *whether the proposed change would dominate or detract in a way that affects our ability to understand and appreciate the historic asset;*
- *the visual impact of the proposed change relative to the scale of the historic asset or place and its setting;*
- *the visual impact of the proposed change relative to the current place of the historic asset in the landscape;*
- *the presence, extent, character and scale of the existing built environment within the surroundings of the historic asset or place and how the proposed development compares to this;*
- *the magnitude of the proposed change relative to the sensitivity of the setting of an asset;*
- *sometimes relatively small changes, or a series of small changes, can have a major impact on our ability to appreciate and understand a historic asset or place. Points to consider include:*
 - *the ability of the setting to absorb new development without eroding its key characteristics;*
 - *the effect of the proposed change on qualities of the existing setting such as sense of remoteness, current noise levels, evocation of the historical past, sense of place, cultural identity, associated spiritual responses; and*

²⁹ ICOMOS (2005). Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas. Available at: <https://www.icomos.org/images/DOCUMENTS/Charters/xian-declaration.pdf> (Accessed 27/01/2026).

- *cumulative impacts: individual developments may not cause significant impacts on their own, but may do so when they are combined*¹².

Significance of Effect

- 1.5.13 The level of effect is judged to be the interaction of the asset’s importance or relative sensitivity (**Tables 5.1.1** and **5.1.2**) and the magnitude of the impact (**Table 5.1.3**). In order to provide a level of consistency, the assessment of importance and relative sensitivity, the prediction of magnitude of impact and the assessment of level of effect will be guided by pre-defined criteria.
- 1.5.14 The predicted level of effect on each heritage asset is then determined by considering the asset’s importance and/or relative sensitivity in conjunction with the predicted magnitude of the impact. The method of deriving the significance of effect is provided in **Table 5.1.4**.

Table 5.1.4: Significance of Effect based on Inter-Relationship between the Importance and/or Sensitivity of a Heritage Asset and/or its Setting and the Magnitude of Impact					
Magnitude of Impact	Importance and/or Relative Sensitivity to Changes to Setting				
	Negligible	Low	Medium	High	Very High
High	Minor	Moderate	Moderate	Major	Major
Medium	Negligible/Neutral	Minor	Moderate	Moderate	Major
Low	Negligible/Neutral	Negligible/Neutral	Minor	Minor	Moderate
Negligible	Negligible/Neutral	Negligible/Neutral	Negligible/Neutral	Minor	Minor

- 1.5.15 Whilst the tables are used to ensure a consistent approach, it is noted that the EIA Handbook states that where matrices “are used, care must be taken to ensure that they are not applied in a mechanistic fashion or in a way that obscures the reasoning behind the assessment”²⁸. The EIA Handbook further states that “Generally, a narrative approach will allow the assessor to set out their reasoning more clearly than a tabulated approach”²⁸. As such a qualitative descriptive narrative is provided for each asset to summarise and explain each of the professional value judgements that have been made in establishing sensitivity and magnitude of impact for each individual asset.
- 1.5.16 Where a neutral level of effect is indicated in the table above this primarily relates to potential setting effects where the Proposed Development would be perceptible and thus result in a change to the baseline setting, but whereby the Proposed Development would not result in an adverse effect on the setting of the asset. This is in line with page 181 of the EIA Handbook²⁸, quoted above, which indicates that visual changes should not necessarily be considered to have an adverse impact upon setting.
- 1.5.17 Using professional judgment and with reference to the Principles of Cultural Heritage Impact Assessment³⁰, and the EIA Handbook²⁸ the assessment considers moderate and greater effects to be significant (**bold in Table 5.1.4**), while minor and lesser effects are considered not significant.

Integrity of Setting

- 1.5.18 NPF4 indicates that development proposals affecting Scheduled Monuments will only be supported where “significant adverse impacts on the integrity of setting of a scheduled monument are avoided” or “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”⁷. Significant adverse impacts on integrity of setting are judged here to relate to whether a change would adversely affect the asset’s key characteristics or elements of setting which contribute to an asset’s significance. It is considered that a significant adverse impact upon the integrity of the setting of an asset will only occur where the degree of change that will be represented by the Proposed Development would adversely

alter those factors of the monument’s setting that contribute to cultural significance such that the understanding, appreciation and experience of an asset are not adequately retained. In terms of effects upon the setting of heritage assets, it is considered that only those effects identified as ‘significant’ in EIA terms will have the potential to significantly adversely impact upon integrity of setting. Where no EIA significant effect is found it is considered that there would be no significant impact upon the integrity of an asset’s setting. This is because for many assets, setting may make a limited contribution to their significance and as such changes would not significantly impact the integrity of their settings. Additionally, as set out in **Table 5.1.3**, lower ratings of magnitude of change relate to changes that would not obscure or erode key characteristics of setting which contribute to the significance of the asset.

- 1.5.19 Where EIA significant effects are found, a detailed assessment of adverse impacts upon integrity of setting is made. Whilst non-significant effects are unlikely to significantly impact integrity of setting, the reverse is not always true. That is, the assessment of an effect as being ‘significant’ in EIA terms does not necessarily mean that the adverse effect to the asset’s setting will significantly adversely impact its integrity. The assessment of adverse impact upon the integrity of an asset’s setting, where required, is a qualitative one.

Requirements for Mitigation

- 1.5.20 National and local planning policies and planning guidance outlined in **Section 1.2** require a mitigation response that is designed to take cognisance of the possible impacts upon heritage assets by a proposed development and avoid, minimise, or offset any such impacts as appropriate. The planning policies and guidance express a general presumption in favour of preserving heritage remains in situ wherever possible. Their ‘preservation by record’ (i.e. through excavation and recording, followed by analysis and publication by qualified archaeologists) is a less desirable alternative, although NPF4 notes that the policy intent is for the protection and enhancement of historic environment assets. Policies related to designated assets (Policies 7a to 7j and 7l) prefer avoidance of impact and where this is not possible require that any impacts are minimised. Policy 7o, relating to non-designated assets, states that these assets and their settings:
- should be protected and preserved in situ wherever feasible [...] Where impacts cannot be avoided they should be minimised. Where it has been demonstrated that avoidance or retention is not possible, excavation, recording, analysis, archiving, publication and activities to provide public benefit may be required through the use of conditions or legal/planning obligations*⁷.

- 1.5.21 While the UK’s EIA Regulations only require the process to seek to apply the mitigation hierarchy, IEMA / ISEP recommends going beyond damage avoidance and seeking opportunities for enhancements³¹.

Assessment of Residual Effect Significance

- 1.5.22 The residual effect is what remains following the application of mitigation and management measures. The level of residual effect is defined using criteria outlined in **Tables 5.1.1** to **5.1.4**. No direct mitigation is possible for setting effects for wind energy developments (beyond embedded mitigation by design) and therefore residual operational phase effects on the setting of heritage assets would be the same as potential (pre-mitigation) effects.

1.6 Cumulative Assessment

- 1.6.1 It is necessary to consider the effects arising from the addition of the Proposed Development to other cumulative developments. Consideration has been given to whether this would result in an additional

³⁰ Institute of Environmental Management and Assessment (IEMA) (2021). *Principles of Cultural Heritage Impact Assessment In The UK*. Available at: <https://www.portsmouth.gov.uk/wp-content/uploads/2023/05/CD-7-19-Principles-of-Cultural-Heritage-Impact-Assessment-2021.pdf> (Accessed 27/01/2026).

³¹ IEMA (2024). *Implementing the Mitigation Hierarchy from Concept to Construction*. Available at: <https://www.iema.net/media/oone2qce/iema-mitigation-in-eia-guidance-final.pdf> (Accessed 27/01/2026).

cumulative change upon heritage assets, beyond the levels predicted for the Proposed Development alone.

- 1.6.2 The cumulative assessment has regard to the guidance on cumulative effects upon heritage assets as set out in EIA Handbook²⁸ and utilises the criteria used in determining effects from the Proposed Development as outlined in **Tables 5.1.1 to 5.1.4** above. The assessment of cumulative effects considers whether there would be an increased impact, either additive or synergistic, upon the setting of heritage assets as a result of adding the Proposed Development to a baseline, which may include operational, under construction, consented or proposed developments. It is necessary to consider whether the effects of other schemes in conjunction with the Proposed Development would result in an additional cumulative change upon heritage assets, beyond the levels predicted for the Proposed Development alone.
- 1.6.3 In determining the degree to which a cumulative effect may occur as a result of the addition of the Proposed Development into the cumulative baseline, a number of factors are taken into consideration including:
- the distance between cumulative developments;
 - the interrelationship between their ZTVs (i.e. theoretical visibility);
 - the overall character of the asset and its sensitivity;
 - the siting, scale and design of the cumulative developments themselves;
 - the way in which the asset is experienced;
 - the placing of the cumulative development(s) in relation to both the Proposed Development being assessed and the heritage asset under consideration; and
 - the contribution of the cumulative baseline schemes to the significance of the effect, excluding the individual proposal being assessed, upon the setting of the heritage asset under consideration.
- 1.6.4 The cumulative assessment is based upon a list of operational, under construction or consented developments, along with developments where planning permission has been applied for. Cumulative developments are shown on **Figure 4.14: Cumulative Location Plan (EIAR Volume 3a)**. While all have been considered, only those which contribute to, or have the possibility to contribute to, cumulative effects on specific heritage assets are discussed in detail in the text. Additionally, given the emphasis HES and NatureScot places on significant effects, and the requirements of the EIA Regulations²⁸, cumulative effects have been considered in detail for those assets where the Proposed Development has been judged to have an impact on their setting. Cumulative operational effects have only been specifically considered for those heritage assets for which the magnitude of impact upon setting is Low or above. This is because where the magnitude of impact from the Proposed Development alone is considered to be Negligible or less, adding it to a theoretical cumulative baseline is unlikely to result in a significant cumulative effect.