# Technical Appendix 6.1: Cultural Heritage Assessment Methodology and Significance Criteria

*NOVAR 1 WIND FARM REPOWERING*
*ENVIRONMENTAL IMPACT ASSESSMENT REPORT*

# TECHNICAL APPENDIX 6.1: CULTURAL HERITAGE IMPACT ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

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NOVAR 1 WIND FARM REPOWERING
TECHNICAL APPENDIX 6.1: CULTURAL HERITAGE IMPACT ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

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# 1 Cultural Heritage Environmental Impact Assessment Methodology

## 1.1 Introduction

1.1.1 This technical appendix sets out the methodology that has been adopted in the preparation of the cultural heritage assessment presented in **Chapter 6 (EIAR Volume 2)**.

1.1.2 The assessment distinguishes between the term '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.

*Criteria for Assessing Sensitivity of Heritage Assets*

1.1.3 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 generations[1]. This definition has since been adopted by heritage organisations around the world, including Historic Environment Scotland (HES). The Historic Environment Policy for Scotland (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*[2]". 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*[3]".

1.1.4 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 past[4]. 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] ICOMOS, (2013), Burra Charter Article 1.2. https://australia.icomos.org/publications/burra-charter-practice-notes/ [Accessed 26 November 2025]
[2] HES, (2019), Historic Environment Policy for Scotland. p.5. https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps [Accessed 26 November 2025]
[3] HES, (2023), Our Past, Our Future. p.10. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=79204155-9eb2-4d29-ab14-aff200ec2801 [Accessed 26 November 2025]
[4] HES, (2019), Historic Environment Policy for Scotland. https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps [Accessed 26 November 2025]



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1.1.5 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 1; which itself relates to the criteria for designations as set out in Designation Policy and Selection Guidance[5] and Scotland's Listed Buildings[6].

***Table 1: Criteria for Establishing Importance of Heritage Assets***

| Importance | Receptors |
|---|---|
| Very High | • World Heritage Sites (as protected by NPF 4[7]);<br>• Other designated or non-designated heritage assets with demonstrable Outstanding Universal Value. |
| High | • Scheduled Monuments (as protected by the Ancient Monuments and Archaeological Areas Act 1979[8]);<br>• Category A Listed Buildings (as protected by the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997[9]);<br>• Inventory Gardens and Designed Landscapes (as protected by the 1979 Act, as amended by the Historic Environment (Amendment) (Scotland) Act 2011[10]);<br>• Inventory Battlefields (as protected by the 1979 Act, as amended by the 2011 Act[11]);<br>• Outstanding examples of some period, style or type;<br>• Non-designated assets and/or Locally Listed assets considered to meet the criteria for the designations as set out above (as protected by NPF4[12]. |
| Medium | • Category B and C Listed Buildings (as protected by the 1997 Act[13]);<br>• Conservation Areas (as protected by the 1997 Act[14]);<br>• Major or representative examples of some period, style or type; or<br>• Non-designated assets and/or Locally Listed assets considered to meet the criteria for the designations as set out above (as protected by NPF4[15]. |
| Low | • Locally Listed assets;<br>• Examples of any period, style or type which contribute to our understanding of the historic environment at the local level. |

[5] HES, (2020), Designation Policy and Selection Guidance. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=8d8bbaeb-ce5a-46c1-a558-aa2500ff7d3b [Accessed 26 November 2025]
[6] UK Government, (1997), Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. https://www.legislation.gov.uk/ukpga/1997/9/pdfs/ukpga_19970009_en.pdf [Accessed 26 November 2025]
[7] Scottish Government, (2023), National Planning Framework 4 (NPF4). https://www.gov.scot/publications/national-planning-framework-4/ [Accessed 26 November 2025]
[8] UK Government, (1979), The Ancient Monuments and Archaeological Areas Act 1979. http://www.legislation.gov.uk/ukpga/1979/46/pdfs/ukpga_19790046_en.pdf [Accessed 26 November 2025]
[9] UK Government, (1997), Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. https://www.legislation.gov.uk/ukpga/1997/9/pdfs/ukpga_19970009_en.pdf [Accessed 26 November 2025]
[10] Scottish Government, (2011), Historic Environment (Amendment) (Scotland) Act 2011. https://www.legislation.gov.uk/asp/2011/3/contents/enacted [Accessed 26 November 2025]
[11] Ibid.
[12] Scottish Government, (2023), National Planning Framework 4 (NPF4). https://www.gov.scot/publications/national-planning-framework-4/ [Accessed 26 November 2025]
[13] UK Government, (1997), Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. https://www.legislation.gov.uk/ukpga/1997/9/pdfs/ukpga_19970009_en.pdf [Accessed 26 November 2025]
[14] Ibid.
[15] Scottish Government, (2023), National Planning Framework 4 (NPF4). https://www.gov.scot/publications/national-planning-framework-4/ [Accessed 26 November 2025]

| Importance | Receptors |
|---|---|
| Negligible | • Relatively numerous types of features;<br>• Findspots of artefacts that have no definite archaeological remains known in their context;<br>• The above non-designated features are protected by Policy 7o of NPF4[16]. |

1.1.6 Determining cultural heritage significance can be made with reference to the intrinsic, contextual and associative characteristics of an asset as set out in HEPS[17] and its accompanying Designation Policy and Selection Guidance[18]. 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[19]. 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*[20]", 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*[21]". It is therefore recognised that the importance of an asset is not the same as its sensitivity to changes to its setting[22]. 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.

1.1.7 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 experience, understanding and appreciation 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

[16] Ibid.
[17] HES, (2019), Historic Environment Policy for Scotland. p.5. https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps [Accessed 26 November 2025]
[18] HES, (2020), Designation Policy and Selection Guidance. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=8d8bbaeb-ce5a-46c1-a558-aa2500ff7d3b [Accessed 26 November 2025]
[19] Ibid.
[20] HES, (2020), Managing Change in the Historic Environment: Setting. p. 11. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549 [Accessed 26 November 2025]
[21] SNH and HES, 2018, Environmental Impact Assessment Handbook. Version 5. p.184. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0 [Accessed 26 November 2025]
[22] Ibid.





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 direct 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*[23]". 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.

1.1.8 The criteria used for establishing an asset's relative sensitivity to changes to its setting is detailed in Table 2. This table has been developed based on AOC Archaeology Group's professional judgement and experience in assessing setting effects. It has been developed with reference to the policy and guidance noted above including NPF4[24], HEPS[25] and its Designation Policy and Selection Guidance[26], the Xi'an Declaration[27], the EIA Handbook[28] and HES's guidance on the setting of heritage assets[29].

***Table 2: Criteria for Establishing Relative Sensitivity of a Heritage Asset to Changes to its Setting***

| Relative 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. |

[23] HES, (2020), Managing Change in the Historic Environment: Setting. p. 11. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549 [Accessed 26 November 2025]
[24] Scottish Government, (2023), National Planning Framework 4 (NPF4). https://www.gov.scot/publications/national-planning-framework-4/ [Accessed 26 November 2025]
[25] HES, (2019), Historic Environment Policy for Scotland. p.5. https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps [Accessed 26 November 2025]
[26] HES, (2020), Designation Policy and Selection Guidance. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=8d8bbaeb-ce5a-46c1-a558-aa2500ff7d3b [Accessed 26 November 2025]
[27] ICOMOS, (2005), Xi'An Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas. https://icomosjapan.org/static/homepage/charter/declaration2005.pdf [Accessed 26 November 2025]
[28] SNH and HES, 2018, Environmental Impact Assessment Handbook. Version 5. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0 [Accessed 26 November 2025
[29] HES, (2020), Managing Change in the Historic Environment: Setting. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549 [Accessed 26 November 2025]

| Relative Sensitivity | Criteria |
|---|---|
| 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's Managing Change: Setting document[30] for discussion of intrinsic, contextual and associative characteristics which may contribute to overall cultural significance). |
| 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's Managing Change: Setting document[31] for discussion of intrinsic, contextual and associative characteristics which may contribute to overall cultural significance). |
| 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. |

1.1.9 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 setting[32]. The criteria set out in Table 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.

*Criteria for Assessing Magnitude of Impact*

1.1.10 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.

1.1.11 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*[33]". Direct 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*

[30] Ibid.
[31] Ibid.
[32] Ibid., p.9.
[33] SNH and HES, 2018, Environmental Impact Assessment Handbook. Version 5. p.181. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0 [Accessed 26 November 2025]





*should be assessed with reference to the degree that the proposal affects those aspects of setting that contribute to the asset's cultural significance*[34]". 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*[35]". 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*[36]".

1.1.12 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 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.

*Criteria for Assessing Magnitude of Impact*

1.1.13 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.

1.1.14 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*[37]". Direct 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*[38]". 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*[39]". It is further of note that the EIA handbook states that "*Change in the setting of an asset may be entirely*

[34] Ibid.
[35] Ibid., p.184.
[36] Ibid., p. 181.
[37] SNH and HES, 2018, Environmental Impact Assessment Handbook. Version 5. p.181. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0 [Accessed 26 November 2025]
[38] Ibid.
[39] Ibid., p.184.

*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*[40]".

1.1.15 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 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 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;<br>• 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[41] 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;<br>• 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 legible. The key characteristics of the setting[42] 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;<br>• 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;<br>• A reversible alteration to the fabric of the asset;<br>• A marginal alteration to the asset's baseline setting that would leave cultural significance of the asset unchanged. |
| None | No impact predicted. |

[40] Ibid., p. 181.
[41] HES, (2020), Managing Change in the Historic Environment: Setting. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549 [Accessed 26 November 2025]
[42] Ibid.





1.1.16 In line with HES guidance on setting[43], factors which will be considered in coming to a judgement regarding magnitude of 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*
    - *cumulative impacts: individual developments may not cause significant impacts on their own, but may do so when they are combined*[44]."

*Criteria for Assessing Significance*

1.1.17 The level of effect is judged to be the interaction of the asset's importance or relative sensitivity (Tables 1 and 2) and the magnitude of the impact (Table 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.

[43] Ibid.
[44] Ibid., p. 10-11.

1.1.18 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 4.

***Table 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 |

1.1.19 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*[45]". 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*[46]". 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.

1.1.20 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 EIA Handbook[47] which indicates that visual changes should not necessarily be considered to have an adverse impact upon setting.

1.1.21 Using professional judgment and with reference to the Principles of Cultural Heritage Impact Assessment[48] and the EIA Handbook[49] the assessment considers moderate and greater effects to be significant (bold in Table 4), while minor and lesser effects are considered not significant.

[45] SNH and HES, 2018, Environmental Impact Assessment Handbook. Version 5. p.185. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0 [Accessed 26 November 2025]
[46] Ibid., p. 184.
[47] Ibid., p. 181.
[48] IEMA, (2021), Principles of Cultural Heritage Impact Assessment In The UK. https://www.portsmouth.gov.uk/wp-content/uploads/2023/05/CD-7-19-Principles-of-Cultural-Heritage-Impact-Assessment-2021.pdf [Accessed 26 November 2025]
[49] Ibid., p. 181.





*Integrity of Setting*

1.1.22 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*[50]". Significant adverse impacts on integrity of setting are judged here to relate to whether a change would adversely affect the asset's key attributes 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 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.

1.1.23 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' does not necessarily mean that the adverse effect to the asset's setting will significantly impact its integrity. The assessment of adverse impact upon the integrity of an asset's setting, where required, is a qualitative one.

*Assessment of Cumulative Effect Significance*

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

1.1.25 The cumulative assessment has regard to the guidance on cumulative effects upon heritage assets as set out in EIA Handbook[51] and utilises the criteria used in determining effects from the Proposed Development as outlined in Tables 1 to 4 above. The assessment of cumulative effects considers whether there would be an increased impact, either additive or synergistic,

[50] Scottish Government, (2023), National Planning Framework 4 (NPF4). Policy 7h(ii), p.46. https://www.gov.scot/publications/national-planning-framework-4/ [Accessed 26 November 2025]
[51] SNH and HES, 2018, Environmental Impact Assessment Handbook. Version 5. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0 [Accessed 26 November 2025]

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 will result in an additional cumulative change upon heritage assets, beyond the levels predicted for the Proposed Development alone.

1.1.26 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.

1.1.27 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 listed in **Chapter 2 (EIAR Volume 2)**. 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 NatureScot places on significant effects, and the requirements of the EIA Regulations, cumulative effects have been considered in detail for those assets where the Proposed Development has been judged to have an impact on their setting. Where No Impact has been predicted for the Proposed Development, there will be no cumulative effect.

*Requirements for Mitigation*

1.1.28 National and local planning policies and planning guidance outlined in Section 6.3 of **Chapter 6 (EIAR Volume 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[52]. Policies related to designated assets[53] 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*[54]."

1.1.29 While the UK's EIA Regulations only require the process to seek to apply the mitigation hierarchy, the ISEP (formerly the IEMA) recommends going beyond damage avoidance and seeking opportunities for enhancements[55].

*Assessment of Residual Effect Significance*

1.1.30 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 1 to 4. No direct mitigation is possible for setting effects (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.

[52] Scottish Government, (2023), National Planning Framework 4 (NPF4). p. 45. https://www.gov.scot/publications/national-planning-framework-4/ [Accessed 26 November 2025]
[53] Ibid., Policies 7a to 7j and 7l. p. 45-46.
[54] Ibid., p. 46-47.
[55] IEMA, (2024), Implementing the Mitigation Hierarchy from Concept to Construction. p. 18. https://www.iema.net/media/oone2qce/iema-mitigation-in-eia-guidance-final.pdf [Accessed 26 November 2025]

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