## **10. Historic Environment**

## 10.1 Introduction

10.1.1 This chapter of the EIA Report assesses the likely significant effects of the Proposed Development with respect to the Historic Environment. The chapter should be read in conjunction with the description of the Proposed Development provided in Chapter 3 – Description of the Proposed Development and with respect to relevant parts of Chapter 9 – Landscape and Visual Impact Assessment of the EIA Report, where common receptors have been considered and where there is an overlap or relationship between the assessment of effects.

## 10.2 Limitations of this assessment

10.2.1 No limitations that would affect this chapter have been identified. The chapter draws on a site visit carried out in 2017 and, as the use of the Development Site (commercial forestry) has not changed in the intervening period, nor have the planted areas changed, no further site work was considered necessary.

## 10.3 Relevant legislation, planning policy, technical guidance

10.3.1 The sub-sections below summarise the legislation, planning policy and technical guidance relevant to the historic environment.

## Legislative context

- 10.3.2 The following legislation is relevant to the assessment of the effects on historic environment receptors:
  - The Ancient Monuments and Archaeological Areas Act 1979 ('AMAAA') provides for a schedule of monuments which are protected and sets out measures for the protection and management of these.
  - The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 provides for the definition and protection of a list of buildings and areas of architectural and historical interest, including conservation areas. The Act sets out a requirement to have special regard to the desirability of preserving the integrity and setting of listed buildings and conservation areas in considering any proposed development.
  - Historic Environment (Scotland) Act 2014, which further amended provisions of the above Acts and established Historic Environment Scotland.

## **Planning Policy Context**

10.3.3 A summary of the National Planning Framework 4 ('NPF4) and East Ayrshire Local Development Plan ('LDP') policies relevant to planning applications that may affect the historic environment are provided in **Table 10.1**. The East Ayrshire LDP was adopted in 2017. This is set to be supplanted by the Local Development Plan 2 ('LDP2'), which was submitted to Scottish Ministers for Examination in December 2022 and submitted to the Scottish Government's Planning and Environmental Appeals Division ('DPEA') in

February 2023. Relevant draft policies from East Ayrshire LDP2 have been set out below in **Table 10.1**, below the active policies from the 2017 East Ayrshire LDP.

Policy reference	Policy issue				
National planning policies					
NPF4: Policy 11 (Energy)	Policy 11 (e) identifies a number of considerations which are likely to be relevant when determining proposed energy infrastructure developments, including " <i>vii. impacts on the historic environment</i> ".				
NPF4: Policy 7 (Historic assets and places)	Protection and enhancement of the historic environment forms part of the Scottish Government's national spatial strategy set out on page 7 of NPF4.				
	The policy intent for Policy 7 is to "protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.".				
	In relation to listed buildings, Policy 7(c) states that "Development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting. Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest."				
	In relation to scheduled ancient monuments, Policy 7(h) states "Development proposals affecting scheduled monuments will only be supported where: i. direct impacts on the scheduled monument are avoided; ii. ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or iii. 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."".				
	In relation to gardens and designed landscapes, Policy 7(i) states that "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.".				
	In relation to archaeology, Policy 7(o) states that "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				

## Table 10.1 Planning Policy Issues Relevant to the Historic Environment



Policy reference	Policy issue				
	provide public benefit may be required through the use of conditions or legal/planning obligations. []"".				
PAN 2/2011 Planning and Archaeology (July 2011)	This document provides advice to planning authorities and developers of dealing with archaeological remains.				
Historic Environment Policy for Scotland ('HEPS')	The document is designed to support and enable good decision-making about changes to the historic environment. HEPS sets out a series of principles and policies for the recognition, care and sustainable management of the historic environment.				
East Ayrshire LDP 2017 poli	cies				
ENV 1: Listed Buildings	Protection of listed buildings as well as non-listed buildings within conservation areas.				
ENV2: Scheduled Monuments and Archaeological Resources.	Protection of archaeological heritage assets.				
ENV 3: Conservation Areas	Protection of conservation areas and their settings.				
ENV4: Gardens and Designed Landscapes	Protection of gardens and designed landscapes, including Inventory and Non-Inventory lists.				
ENV5: Historic Battlefields.	Protection of conservation areas and their settings.				
East Ayrshire LDP2 2023 policies					
Policy HE1: Listed buildings	Protection of listed buildings, their curtilage and settings.				
Policy HE2: Conservation Areas	Protection of conservation areas and their settings.				
Policy HE3: Scheduled Monuments, Historic Battlefields and other Archaeological and Historic Environment assets	Protection of scheduled monuments, their settings, historic battlefields, non-designated archaeological and historic environment resources.				
Policy HE4: Gardens and Designed Landscapes	Protection of gardens and designed landscapes, including Inventory and Non-Inventory lists.				

## **Technical Guidance**

10.3.4 In the consideration of planning applications affecting the historic environment, planning authorities are directed to the Historic Environment Policy for Scotland 2019 (HEPS), Historic Environment Circular 1 (2019), Planning Advice Note (PAN) 2/2011 and the *Managing Change in the Historic Environment* guidance note series. The most relevant of the *Managing Change* series to this assessment are *Managing Change in The Historic Environment* are *Managing Change in The Historic Environment* and *Managing Change in The Historic Environment*. *Setting* (2016) and *Managing Change in The Historic Environment*: *Gardens and Designed Landscapes* (2016).



10.3.5 The assessment has been carried out in accordance with the principles laid down in the Standard and Guidance for Historic Environment Desk-Based Assessments (CIfA, 2017). Historic Environment Scotland's 2018 Environmental Impact Assessment Handbook was also consulted during the production of the assessment.

## **10.4 Data gathering methodology**

## Study area

- 10.4.1 To establish the baseline for the assessment of direct effects, data was collected for both designated and non-designated heritage assets for an area extending to a 500m radius from the Development Site boundary, referred to as the 'study area'.
- 10.4.2 An extended study area of 10km radius from the Development Site boundary was used to initially collect data on heritage assets of regional or potentially national importance, together with designated sites which had the potential to be indirectly affected by the Proposed Development (referred to as the 'extended study area').

## Desk study

- 10.4.3 For the purpose of establishing the historic environment baseline, the following sources were consulted:
  - National and County-based registers of known archaeological and historical sites;
  - Cartographic and historic documents;
  - Aerial photographs;
  - Historic Land-use Assessment ('HLA') mapping;
  - Geological mapping;
  - Published sources; and
  - Internet sources.
- 10.4.4 These were obtained from the following organisations:
  - The West of Scotland Archaeology Service (WoSAS) Historic Environment Record (HER), accessed via their online website, Canmore and data order (February 2023);
  - Historic Environment Scotland, geospatial data as of March 2022;
  - The National Archives of Scotland;
  - National Library of Scotland Map Library; and
  - The British Geological Survey (BGS).

## Survey work

10.4.5 A site visit was undertaken in July 2017. Previously identified archaeological features, including those identified through the desk-based research as well as those identified by the WoSAS HER within the development area, were visited to confirm ground conditions. The locations of known features and those identified within the walkover were recorded using a hand-held GPS with an accuracy of ±5m. As the use of the Development Site



(commercial forestry) has not changed in the intervening period, nor have the planted areas changed, no further site work was considered necessary.

## 10.5 Overall baseline

## **Current baseline**

#### Site Description and Geology

- 10.5.1 The Development Site is located within an area of primarily commercial plantation forestry, with a smaller area of upland moorland. The historic landscape can be characterised as having been subject to extensive and far-reaching change in the 20th century with the establishment of Carsphairn Forest and related forestry plantation during the 1970s, and with the more settled rural valley floor landscape around the town of New Cumnock, approximately 6kmto the north-east of the Development Site, which also includes active surface mines.
- 10.5.2 The superficial deposits, where recorded, largely comprise of peat, with some patches of till along the access route. The bedrock geology comprises sedimentary bedrock of the Kirkcolm Formation formed between 458.4 and 449.0 million years ago during the Ordovician period (BGS, 2020).

#### Existing Historic Environment Baseline

#### **Designated Assets**

- 10.5.3 There are no designated heritage assets within the Development Site boundary.
- 10.5.4 There are 18 listed buildings within the 10km extended study area, nine of which are located at the western edge of the study area, within the Dalmellington Conservation Area (see **Figure 10.1**).
- 10.5.5 There are no Historic Battlefields or World Heritage Sites within 10km of the Development Site.
- 10.5.6 Three scheduled monuments, one Conservation Area and one designated Garden and Designed Landscape (GDL) are located between 5km and 10km of the Development Site, with an additional scheduled monument located over 10km beyond the Development Site (**Figure 10.1** and specific information in **Appendix 10A**) including Craigengillan GDL.

#### Scheduled Monuments

- Kyle Castle, 200m E of Dalblair SM3311 (9.7km north-east of Development Site boundary)
- Dalmellington, motte SM3009 (9.4km west of Development Site boundary)
- The King's Cairn, chambered cairn and cairn to W of Water of Deugh SM1046 (5.1km south-west of Development Site boundary)
- Dalnean Hill, farmstead and field system SM4390 (11.1km west of Development Site boundary)

#### Conservation Area

• Dalmellington Conservation Area (9.4km west of Development Site boundary)

#### Gardens and Designed Landscape

- Craigengillan Designed Landscape, GDL00111 (10km west of Development Site boundary)
- 10.5.7 The closest designated heritage assets to the Development Site are located within New Cumnock and these have settings which are defined by their immediate surroundings and to which longer views make a minimal contribution. These are Category C listed buildings Mossmark of Oldmill, East Polquhirter and Town Hall and Police Station (LB14249, LB14250, LB50128 respectively) in addition to Category B-listed buildings Martyrs Parish Church, Old Church and Churchyard and Nith Bridge (LB14246, LB14247, LB14248 respectively). Other designated heritage assets are located over 5km from the Development Site boundary.

#### Non-Designated Heritage Records

- 10.5.8 There are 20 HER records within the 500m study area (**Figure 10.2**). Canmore contains 16 records within the 500m study area, many of which duplicate the HER records. The records largely comprise features relating to post medieval agricultural activity (e.g., structure and buildings HER 20877, HER 20888), livestock management (e.g., sheepfolds HER 69244, HER 69248 and enclosures HER 69254). There is also evidence of post medieval quarrying within the area (e.g., HER 69255, HER 69243, Canmore 32889).
- 10.5.9 Two non-designated heritage assets, Beoch Cairn (HER7989) and Fardenreoch Cairn (HER 8018), which are outside of the 500m study area were identified during scoping as having sensitive settings and are therefore included in the assessment of effects. Their locations are illustrated on **Figure 10.1** and detailed in **Appendix 10B**.

#### Map regression and site visit

- 10.5.10 Eight further features were identified during the production of the desk-based assessment. These are predominantly additional features relating to post-medieval activity and farming, including sheepfolds and enclosures marked on the 1<sup>st</sup> edition Ordnance Survey (OS mapping. These are illustrated on Figure 10.2 and detailed in the gazetteer in Appendix 10A, labelled in both cases with the prefix "DBA".
- 10.5.11 The general area around the Development Site is shown on county mapping of Kirkcudbrightshire dating back to Pont's Atlas of the later-16<sup>th</sup> century, though the first map to show the Development Site in any detail is Roy's military map of 1747-55. The Development Site is shown as undulating moorland with settlement within the vicinity, including "*Penclo*" to the north-east. Subsequent pre-Ordnance Survey mapping shows no further change within the Development Site.
- 10.5.12 The first edition OS mapping (6"-1 mile: 1853-60) is the first record of the post-Improvement landscape. The Development Site itself however still remained predominantly uncultivated moorland, with occasional sheepfold and enclosure walls (e.g., DBA5, DBA8). Pencloe farmstead is present close to the start of the access track along with several quarries and gravel pits noted in the vicinity. There is relatively little substantial change to the land within the Development Site boundary until the introduction of forestry in the 20<sup>th</sup> century.

#### Site Chronology

10.5.13 Designated heritage assets within the extended study area reflect the historical development of the area. While these heritage assets are sparsely distributed, the relatively limited modern development and improvement of the area means that remains are frequently well preserved.

#### Prehistoric Periods

10.5.14 There are no prehistoric features known within the Development Site boundary. Within the wider 10km study area, the Prehistoric period is represented by a number of well-preserved monumental and ceremonial or 'ritual' features including cairns and stone circles (e.g., the scheduled Kings Cairn SM1046). There is no specific evidence to suggest there would be as yet unknown remains of this period within the Development Site boundary.

#### Medieval Period

- 10.5.15 There are no medieval features known within the Development Site boundary.
- 10.5.16 Scheduled monuments within the 10km extended study area provide evidence for medieval activity in the wider area including the Motte at Dalmellington (SM3009) and the remains of Kyle Castle near Dalblair (SM3311), although there is no specific evidence to suggest there would be as yet unknown remains of this period within the Development Site boundary.

#### Post Medieval and Industrial Period

- 10.5.17 The post medieval occupation of the study area appears to be primarily related to agricultural and pastoral activity as would be expected to have been formed during the agricultural improvement period of the late 18<sup>th</sup> and early 19<sup>th</sup> centuries. Elements of this land use are still present within the study area as demonstrated by a series of sheepfolds and enclosures (e.g., HER 7988 and HER 8022). This is further evidenced within the Old Statistical Account (OSA) 1791-99 which describes a parish of a purely agricultural nature.
- 10.5.18 Within the study area and the extended study area, the late-18th and early-19th centuries saw significant change, which can be characterised as:
  - abandonment of earlier forms of subsistence farming based on transhumant pasturage and intensification of agricultural and pastoral activity;
  - consolidation and engrossment of landed estates; and
  - introduction of new industrial activities.
- 10.5.19 The changes are further evidenced in the New Statistical Account (NSA) 1834-45 which describes the drainage and reclamation of land within this region and describes the coal seams that were then known within the area together with their mining. The clearest evidence of the expansion in industry at this time however is most clearly evidenced through early OS mapping. The GDL at Craigengillan also dates from this later period.

## Future baseline

10.5.20 In the absence of the Proposed Development, there would be no change to the baseline condition of the Development Site. There are several developments planned in the vicinity, and these have been considered at **Section 10.13** of this chapter in terms of cumulative effects.



10.5.21 Changes in forestry cultivation, most notably the felling, restocking and growth of forestry plantations also have the potential to influence the assessment of effects at the King's Cairn. These changes have been considered at **Section 10.12** of this chapter.

## 10.6 Consultation

10.6.1 **Table 10.2** provides a summary of the issues relating to the Proposed Development that have been raised by consultees via the EIA Scoping Opinion and the responses given.

## Table 10.2 Summary of Historic Environment issues raised during consultation

Issue raised	Consultee(s)	Response and how considered in this chapter	Section Ref
Scope of assessment – Agreed	Historic Environment Scotland (HES)	Acknowledged and expanded on in <b>section</b> 10.7	10.7
Scope of assessment	WoSAS	No response received to date (March 2023)	N/A

## 10.7 Scope of the assessment

## **Spatial scope**

#### Effects arising through direct disturbance

10.7.1 As direct effects would arise only as a result of physical disturbance or damage to heritage assets, the potential for direct effects is confined to the footprint of the Proposed Development. Therefore, the scope of assessment for direct effects is restricted to the Development Site boundary.

#### Effects arising through change to setting

- 10.7.2 The scope of assessment of the effects of the Proposed Development arising through change to setting is confined to those assets set out in the EIA Scoping Report which were identified through data searches of an area up to 10km initially, but also included a wider check of assets out to 15km in relation to the zone of theoretical visibility of the Proposed Development. These are shown in **Figure 10.1**.
- 10.7.3 For the purpose of understanding the settings of heritage assets, they have generally been considered as groups linked by either physical proximity or thematic links. This does not presuppose that individual assets within each group have the same setting but acknowledges that there are sufficient similarities and common characteristics to the settings of these assets to allow them to be assessed together.
- 10.7.4 The baseline setting of each relevant heritage asset or related group of assets was characterised on a case-by-case basis. Characterisation of setting of an asset was based upon its properties and location and considered the factors identified in guidance on setting issued by Historic Environment Scotland (2016). The baseline setting of each asset was characterised principally in terms of the:
  - archaeological / historical context of the asset;
  - current perceptual, primarily visual, surroundings of the asset;

- aesthetic and experiential properties of the asset within its surroundings; and
- factors such as: the location and orientation of the asset; important views of and from principal facades; the importance, if applicable, of designated settings, and any obvious views or vistas.
- 10.7.5 Where it was established that the setting of a heritage asset is such that there is no potential for it to be affected by the Proposed Development, it was not considered further in the assessment. The listed buildings within New Cumnock, whilst falling within the ZTV, are not considered further due to their location within the north of the town.

## **Temporal scope**

- 10.7.6 In line with the general methodology of the EIA Report (**Chapter 4 Approach to Preparing the EIA Report**), the temporal scope of the assessment of the Historic Environment refers to the following key stages of development:
  - Construction the effects may arise from the construction activities themselves, or from the temporary occupation of land e.g., plant movement or compound/welfare facility setup. Effects are often of limited duration although there is potential for permanent effects, particularly where archaeological remains are disturbed.
  - Operation effects may be permanent, or they may be temporary, intermittent, or limited to the life of a proposed development until decommissioning (as in the case of wind power developments which gain planning permission for a defined and finite number of years).
  - Decommissioning effects may arise from the decommissioning activities themselves, or from the temporary occupation of land e.g., plant movement or compound/welfare facility setup. The effects would generally be temporary and of limited duration. Additional permanent change would normally be unlikely unless associated with restoration.

## **Potential receptors**

10.7.7 Potential receptors have been distinguished through the nature of the anticipated development impacts.

#### Potential Receptors of Effects arising through disturbance

- 10.7.8 These effects would arise during the construction phase only and would be permanent and irreversible.
- 10.7.9 Given that any disturbance and/or removal of heritage assets would have occurred during the construction, operation and decommissioning of the Proposed Development are not anticipated to result in additional disturbance and therefore no further disturbance effects would arise during these phases.
- 10.7.10 The potential receptors of disturbance effects comprise:
  - archaeological remains and archaeological deposits surviving within the Development Site boundary.
  - potential receptors of direct effects are restricted to previously unrecorded archaeological remains and deposits of geoarchaeological or paleoenvironmental interest.

#### Receptors of effects arising through change to setting

- 10.7.11 These effects would initially arise during the construction phase. However, as any change during construction would be temporary and short-lived, setting effects are considered for the operational phase only. Removal of the proposed wind turbines at the end of the operational period would result in the effective reversal of any change to setting. However, in line with the approach that was taken under Scottish Planning Policy ('SPP'), and on the assumption that will be followed in NPF4, the effects of the Proposed Development are considered in perpetuity and the ability to reverse any adverse change to setting has not been considered within this assessment.
- 10.7.12 Identifiable groups of heritage assets have been considered as groups in terms of baseline and general discussion of change to setting, but an individual assessment is offered of each heritage asset.

## 10.8 Likely significant effects

- 10.8.1 The EIA Scoping Report identified the potential for significant adverse effects to arise on the following receptors:
  - Effects arising through disturbance to:
    - Previously unrecorded non-designated heritage assets within the Development Site boundary.
  - Effects arising through change to setting to (key assets identified through consultation and scoping, referred to below under group headings but considered individually with relationships between assets discussed where necessary):
    - Craigengillan House (LB A 18793), Craigengillan Stable Block (LB A 18794) and the associated Craigengillan GDL Landscape (GDL00111);
    - The King's Cairn, Chambered Cairn and Cairn to West of Water of Deugh (SM 1046);
    - ▶ Beoch Cairn (HER7989); and
    - ► Fardenreoch Cairn (HER 8018).

# 10.9 Environmental measures embedded into the development proposal

10.9.1 Design evolution has been used to minimise adverse change. Data gathered for both designated and non-designated heritage assets has been made available to the design team to allow consideration for the avoidance of direct impacts upon heritage assets and to identify areas of higher sensitivity to change to setting.

## 10.10 Assessment methodology

- 10.10.1 The levels of effect upon a heritage asset for either direct or indirect effects would largely depend upon its level of importance and the potential magnitude of change. Tables 10.3-10.5 provide details on how the historic environment assessment would establish these qualities, which would then inform the conclusion as to the level of effect upon the asset.
- 10.10.2 The rationale contained within **Table 10.3** is predominantly based on information provided within NPF4 and the associated supporting documents; HEPS and the Historic

Environment Scotland Circular 1 (HES, 2019). Note that the categorisation of the relative importance of those assets which are of less than national importance generally relies on professional judgement.

## Table 10.3 Categorisation of Sensitivity (Importance)

Sensitivity	Rationale
High	World heritage sites are designated on the basis of 'Outstanding Universal Value' and would normally be considered of international importance.
	By legal definition, scheduled monuments are considered as being of national importance. As the process of scheduling is ongoing and as scheduling is a representative designation, there are further assets which are not scheduled but which may be of equivalent importance.
	HES describes Category A listed buildings as buildings of national or international importance, either architectural or historic; or fine, little-altered examples of some particular period, style or building type (HES website - Categories of listed building).
	The NPF4 states that sites identified within the Inventory of Historic Battlefields and the Inventory of Gardens and Designed Landscapes are of national importance.
	Conservation areas rated by HES as of Outstanding quality (where such appraisals have been made) could be considered as being of national importance.
Medium	These include archaeological sites which do not merit scheduling, but which are nevertheless of interest or which could make a substantial contribution to established regional research agendas.
	HES describes Category B listed buildings as buildings of regional or more than local importance; or major examples of some particular period, style or building type, which may have been altered (HES website - Categories of listed building).
	The principles of selection for designation of conservation areas do not explicitly include valuations of national, regional or local importance, although most examples would be of importance on a regional level.
	Designed landscapes that are recognised by local authorities but not included within the Inventory of Gardens and Designed Landscapes would usually be considered to be regionally important.
Low	The majority of non-designated assets would normally be considered of local importance.
	HES describes Category C listed buildings as buildings of local importance; lesser examples of any period, style or building type, as originally constructed or moderately altered; and simple, traditional buildings that group well with other listed buildings (HES website - Categories of listed building).
Lesser	These include those features which are no longer extant, where there are no further known or surviving remains (e.g., locations of previous archaeological work), or where assets may have minimal importance, such as modern quarries.



Magnitude	Definition				
High	Total or substantial change to an asset or complete alteration of the characteristics of an asset's setting.				
Medium	Partial alteration of an asset. Substantial change to the key characteristics of an asset's setting, or a more total alteration which is temporary and/or reversible.				
Low	Minor alteration of an asset. Changes to a setting which do not affect the key characteristics, or which is short term and/or reversible.				
Negligible	Minor alteration of an asset. Minor and short term or very minor and reversible changes to its setting which do not affect the key characteristics.				

#### Table 10.4 Potential Magnitude of Change

#### Table 10.5 Significance Evaluation Matrix

		Magnitude of change				
		High	Medium	Low	Negligible	
	High (National/International)	Significant	Significant	Not significant	Not significant	
e	ຍ Medium (Regional)	Significant	Not significant	Not significant	Not significant	
Importance	Low (Local)	Not significant	Not significant	Not significant	Not significant	
lmp	Lesser Not significant		Not significant	Not significant	Not significant	

## 10.11 Assessment of effects on the historic environment arising through disturbance

- 10.11.1 No previously recorded heritage assets would be affected by the Proposed Development.
- 10.11.2 Effects would be restricted to disturbance of previously unrecorded heritage assets and deposits of paleoenvironmental or geoarchaeological interest that may be identified in working areas during the construction of the Proposed Development.
- 10.11.3 There is no evidence to suggest as yet unknown remains dating to the prehistoric or medieval periods are present. The potential for further, as yet unknown, remains of these periods at the Development Site is therefore considered to be low.
- 10.11.4 Post-medieval remains appear well documented within the HER and in historic mapping as assets relating to the agricultural improvement of the land. Should any further remain dating to this period be present within the areas affected by construction, they are most likely be of low (local), or lesser, importance and would be of interest at a landscape rather than an individual level. The relatively small scale of the Proposed Development means that it is likely that any effects would be localised and limited to smaller elements of any heritage assets.



- 10.11.5 Any disturbance as a result of the Proposed Development would therefore be considered to be of a low magnitude of change which would not give rise to significant adverse effects on EIA terms (regardless of the sensitivity of the receptor).
- 10.11.6 Any potential effects would be mitigated by the adoption of a scheme of archaeological work agreed with the WoSAS Archaeologist.
- 10.11.7 A summary of the significance of adverse effects on the historic environment arising through disturbance is provided in **Table 10.6**.

# 10.12 Assessment of effects on the historic environment arising through change to setting

# Craigengillan Garden and Designed Landscape (GDL00111) and the associated Craigengillan House (LB A 18793), Craigengillan Stable Block (LB A 18794)

#### Importance and Present Setting

- 10.12.1 Craigengillan is an inventory garden and designed landscape that contains several further designated assets. There are two category A listed buildings, Craigengillan House (LB A 18793) and the associated stable block (LB A 18794), three category B listed buildings, the lodge at the entrance to Craigengillan (LB B 1086), an adjacent bridge (LB B 1087) and the Linn River Bridge (LB B 1088), together with the category C listed Dalcairney Bridge (LB C 49506). The remains of a medieval or later farmstead and field at Dalnean Hill are also located within the designed landscape and are designated as a scheduled monument (SM 4390).
- 10.12.2 The inventory listing for Craigengillan GDL states that the asset is important for its outstanding value of historical, arboricultural, architectural and archaeological interest as well as having outstanding value for its scenic properties and as a work of art. As a result, the inventory garden and designed landscape and the assets within it have been considered as a coherent group of assets of national importance for the purposes of this assessment.
- 10.12.3 A number of these identified values of the asset group have the potential to be harmed through change to the setting of the asset group, most notably the scenic importance and value as a work of art of the designed landscape.
- 10.12.4 Aspects of the designed landscape which contribute to a scenic value rated by HES within the inventory description as Outstanding are:
  - Contribution to the villages of Bellsbank and Dalmellington;
  - Composition and integrity of the designed landscape;
  - Contribution to the approach to Loch Doon; and
  - Enrichment of local landscape which has been affected by industrial uses.
- 10.12.5 Contributing factors to the work of art value (rated by HES as Outstanding) which relate to the setting of the asset are:
  - The blending of the designed landscape into the wider landscape; and
  - The picturesque qualities of the overall composition.

- 10.12.6 Contributing factors to the architectural value (rated by HES as Outstanding) of the asset are:
  - The Category A listed 18<sup>th</sup> century house and stable block; and
  - Home Farm, the Gatehouse and several garden buildings and structures including the unique form of drystone wall.
- 10.12.7 Contributing factors to the archaeological value (rated by HES as Outstanding) of the asset are:
  - The scheduled monument of Dalnean Hill; and
  - Further designated and non-designated assets (listed above) contained within the garden and designed landscape.
- 10.12.8 Craigengillan GDL is located close to the western boundary of East Ayrshire and occupies an irregular area covering 1,162ha. The Development Site is bounded by a mixture of urban settlement at Dalmellington and Bellsbank to the east, forestry planting to the east and west, and open moorland to the north and south. The wider landscape is largely agricultural but contains elements that are the result of the 19<sup>th</sup> and 20<sup>th</sup> century coal and quarrying industry, most notably large opencast quarry pits.
- 10.12.9 While there are no identifiable designed views towards specific distant structures or landmarks, the surrounding hills serve to place the designed landscape into a regional context and sequential views from different points along routes through the designed landscape, while fortuitously created, have been exploited to contribute to the overall effect of the designed scheme. There are few clear views into the designed landscape, reinforcing the sense of privacy and seclusion; the most important views being glimpsed views of the house and estate centre from the Loch Doon Road between Bellsbank Plantation and Gaw Glen Burn.
- 10.12.10 To a certain extent, the designed landscape defines the setting of the associated estate buildings by creating an architectural and landscape composition in which the structures were intended to be seen and enjoyed. In this context, the policy woodland and underlying landform around Craigengillan House and Stables creates a tightly defined and controlled space; screening views of the house in the principal approach from the north until the viewer is presented with a dramatic revealed view on arrival and creating an intimate space around the lawn to the west of the house. This characteristic of the estate core appears likely to result from the late 19<sup>th</sup> century replanting of the estate and is characteristic of this period.

## Change to setting

- 10.12.11 Turbines are likely to be visible in views from some parts of the designed landscape to varying degrees, ranging from no visibility in lower-lying areas around Craigengillan House (**Figure 10.1**) the core of the estate and the Ness Glen, to clear (though distant) visibility of upper elements of the turbines from more elevated parts of the estate to the north-west of the landscape (**Figure 10.3**).
- 10.12.12 The Proposed Development would not affect the principal scenic values identified by the inventory description. Specifically:
  - The contribution of the asset to the villages of Bellsbank and Dalmellington and to the approach to Loch Doon would not be affected. Some visibility of turbines would be possible from elevated parts of the asset looking towards these settlements; however, they would appear as small and distant features on an already broken horizon and turbines would not appear in the sequential views on the approach to the asset through

these villages. Similarly, turbines may be visible in a small number of glimpsed and passing views from the approach to Loch Doon, but these would appear as peripheral features and would not be visible with the asset.

- The contribution of the asset to the wider landscape would also not be affected, as this contribution is intrinsic to the asset, being in and of itself a designed landscape present in views and approaches from without.
- The composition and integrity of the designed landscape would not be affected, as none of the elements of that landscape would be directly affected and turbines would not intervene in views to, or from, viewpoints intended to provide specific views of the estate.
- 10.12.13 The picturesque qualities of the overall composition again relate primarily to the character of the asset and its immediate surroundings, including the approach to Loch Doon. Even so, the scale of the Proposed Development and the presence of a number of longdistance views from within the designed landscape mean that this characteristic has been considered further.
- 10.12.14 The work of art values considered in the inventory description may be affected to a degree by the Proposed Development:
  - Visibility of the turbines from key points within the designed landscape, including elements that contribute to the architectural and archaeological value of the landscape such as the Dalnean Hill Scheduled Monument, and in sequential and successive views as the observer passes through the landscape could potentially give rise to harmful effects, and this potential is considered further below.
  - The blending of the designed landscape into the wider landscape relates, by definition, primarily to the area immediately surrounding the designated landscape. The magnitude of any adverse effect would fall off rapidly with distance from the designated asset as the landscape changes from one of deliberate design to one that includes intrusive and incongruous elements such as forestry plantation, modern structures and modern industrial activities as discussed further below.
  - The proposed turbines would be visible to varying degrees in longer views which contribute towards the work of art importance of the Craigengillan GDL. In all these views, they would be visible as distant background elements which are clearly separated from the designed landscape by distance and the intervening hills and forestry. Consequently, the viewer's ability to understand and appreciate the asset would remain.
  - The views from established routes around Bogton Loch would be heavily restricted and further broken by intervening forestry, whilst views from higher ground such as Dalnean Hill, which is occupied by a farmstead and field system (SM4390), would have visibility of a turbine. These views would not affect the understanding of this asset and due to the distance from the Proposed Development (over 10km to the nearest turbine) they would have a sense of separation from the assets through intervening settlements and forestry plantation.
- 10.12.15 Turbines would not be visible in views which contribute to the architectural value of the asset as expressed in the inventory description. Similarly, in terms of archaeological importance, the ZTV shows that views from designated heritage assets within the inventory designed landscape which could be affected by distant views of turbines would be almost entirely precluded. This is considered to be a low magnitude of change and as such the effect would not be significant.

## Significance of Effect

- 10.12.16 The ZTV shows no theoretical blade-tip visibility from Craigengillan House and stables. Blade tips of the Proposed Development would appear in sequential views as the observer moves around the Garden and Designed Landscape, particularly from the northwestern edge (**Figure 10.3**), but always as an element to the background of views and behind the enclosing higher ground to east of the designed landscape and would not discernibly affect the key values of the asset. Consequently, this change is considered to be of low magnitude and would **not give rise to a significant adverse effect** on the setting of the asset.
- 10.12.17 The Dalnean Hill Scheduled Monument is of a specifically agricultural nature, and its setting is defined by its immediate surroundings. While a turbine would be visible as a distant background feature in some views from the asset, this visibility would not affect the key characteristics of the scheduled monument and would therefore present a low magnitude of change, which would **not give rise to a significant effect** on the setting of the asset.

# The King's Cairn, Chambered Cairn and Cairn to West of Water of Deugh (SM 1046)

#### Importance and Present Setting

- 10.12.18 The King's Cairn and a second cairn approximately 300m to the south-west at Brownhill Burn (SMR MDG 17) are covered by the same designation. They are of national (high) importance, primarily for their potential to inform study of the prehistoric period. The King's Cairn has been identified as a Bargrennan-type cairn (Cummings and Fowler 2002), although the condition of the cairn and absence of previous archaeological work makes it difficult to ascribe any such classification to the second cairn.
- 10.12.19 The Brownhill Burn cairn is just outside the ZTV (**Figure 10.1**), while the King's Cairn is located within mature forestry. Signage and access to the King's Cairn was apparently provided as part of the Archaeosights programme and this asset is noted by the Dumfries and Galloway HER as a promoted site. A sign is visible from the forestry road, but the defined access route was overgrown at the time of the site visit to the point where it was all but impassable. The King's Cairn is noted on the Water of Deugh Trail leaflet (Carsphairn Heritage Group 2012).
- 10.12.20 At present, the setting of the King's Cairn is defined by its presence within modern forestry plantation. This detracts from the setting by representing an entirely modern and incongruous context in terms of density of tree cover and species mix, by altering any historic access routes and by precluding visual relationships whether intended, interpreted or fortuitously created. There are presently no views out of the King's Cairn. In the absence of forestry, views of and from the King's Cairn would be focused to the south and east as a result of the asset being located further into the valley of the Water of Deugh.

#### Change to Setting

10.12.21 In the absence of change to the forestry, the proposed turbines would not be visible from King's Cairn, and no change would arise to the setting of the asset. When felling is undertaken in the vicinity of the asset, most likely in coupes with restocking, there could at times be some visibility of blade tips in views of the asset from the east. Upper elements of turbines would appear in close proximity, but on the periphery of the key views down the valley of the Water of Deugh above the maturing forestry to the north and west. VP1

within **Chapter 9 – Landscape and Visual Impact Assessment** is adjacent to the Kings Cairn and gives an indication of the visibility (**Figure 9.22**).

10.12.22 Any visibility would progressively reduce as the forestry planting immediately around the asset achieves maturity, with the higher ground to the north-west combining with new growth to progressively screen views of turbines from the northern part of the array until views of the turbines are precluded. Throughout this period, modern forestry would define the historic landscape character of the immediate surroundings of the asset.

#### Significance of Effect

10.12.23 In the present context, there would be no adverse effect on the King's Cairn as views to the Development Site are precluded by the intervening forestry plantation. While there may be periods of felling during which visibility may increase slightly, the period for which the Proposed Development would be visible is likely to be restricted to a small proportion of the operational life of the Proposed Development during which time the visibility of turbines would not change the defining characteristics of its immediate historic landscape context. Consequently, it is expected that for the majority of the operational life of the Proposed Development, visibility would be severely restricted or entirely precluded. Consequently, the magnitude of change is assessed as low, and no significant adverse effect is considered to be likely.

## Beoch Cairn (HER7989)

## Importance and Present Setting

- 10.12.24 Beoch Cairn is identified by the WoSAS Non-Statutory Register ('NSR') as of probable national importance.
- 10.12.25 The NSR assessment is not recognised by any subsequent formal designation, however, the SPP NPF4 states that non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible.
- 10.12.26 To assess the monuments importance, its condition must be taken into account. The cairn was excavated in 1937 where it was recorded as circular, measuring 35 feet (c. 11m) in diameter with nine large stones projecting above the ground or partially exposed around the kerb (McLeod 1938). This excavation recorded the remains of three, possibly four, cists within the cairn and artefacts recovered included beaker and cinerary urn fragments and ring marked stone. The cairn was subsequently revisited in 1976 and 1980 by the Ordnance Survey, the later visit recorded that forestry ploughing had displaced a number of stones by this time, however, the general outline of the kerb and the presence of a double cist could still be identified.
- 10.12.27 A survey carried out by CFA Archaeology in 2004 as part of the Kyle Wind Farm EIA noted that the remains of an oval stone setting measuring c. 9m NE-SW and 4m across could be identified with an open cist evident in the SE side. It also stated that a tree marked the location of the cairn to the NE. During a visit to this location, no traces of the cairn could be definitively identified, and it is probable that the forestry and undergrowth has encroached to a degree that the monument is now predominantly covered by the plantation.
- 10.12.28 The cultural understanding of a monument can be based in its intrinsic, contextual or associative characteristics or a mix of all of these. In the case of the Beoch Cairn, it can be considered that there is a level of each of these characteristics.

- 10.12.29 The intrinsic value of the asset has been greatly diminished since the time of the original excavation with the condition now appearing in a poor state with the potential for heavy root disturbance below ground together with plough and planting damage on the surface. As a result, although there is still a degree of archaeological potential for the Development Site, it is likely that the findings of any future investigations would not be as informative as they may have once been.
- 10.12.30 The contextual characteristics of Beoch Cairn are more ambiguous as although it is a known burial monument, its original setting and relationship to the wider landscape at that time are not known. Cairns are recorded throughout the region and although the presence of the cists do make this monument less common, the survival of these at this location is now questionable.
- 10.12.31 The associative characteristics of the monument are based in the understanding within the national consciousness, or from the descendants of people who used the monument, together with the associations of the monument with historical and traditional events. As this is a prehistoric cairn, the descendants of the creators are unknown. However, funerary ritual and tradition are better understood and although these have changed over the intervening millennia, the national consciousness is still respectful of human burial in any form. It was however noted during the 1937 excavations that no bones or cremations were located.
- 10.12.32 Given the current appearance and likely disturbance of above and below ground remains of the cairn, the absence of any definable contribution to the historic landscape together with the lack of known human remains, this monument, although once being of a higher quality, is considered unlikely to of schedulable condition. Due to its poor condition, Beoch Cairn is considered to be of regional importance for this assessment due to the rarity of these kinds of cists.
- 10.12.33 The cairn is located close to the B741 carriageway on the edge of forestry planting that extends in all directions. It is not visible in long or close views due to the forestry encroaching upon the location and the only clear views from the cairn itself are of the adjacent road.

## Change to setting

- 10.12.34 Although the ZTV suggests some visibility of the Proposed Development, views to the east from the asset would be screened due to the existing forestry. The turbines would be visible from the B741 but would be clearly separated from the asset due to the planting, with one almost completely obscured behind an intervening hill. As the cairn is not clearly visible from this location given the current setting, the turbines would not affect the characteristics of the setting or the understanding of the asset.
- 10.12.35 The programme of felling in this area is uncertain. If the land were to be clear felled and not replanted, visibility from the asset would increase, although would be relatively minimal as demonstrated by the wireframe projections shown in **Figure 10.4**. It is, however, current forestry practice to fell plantation in coupes, with a relatively short interval of fallow before restocking, meaning that this 'worst case' is unlikely to occur, and that the cairn would remain in a landscape context which remains defined by forestry plantation (at a distance of 6.6km from the Proposed Development).

## Significance of Effect

10.12.36 With the current setting of the asset, turbines would not be visible from the asset or in views of the asset from north on the B741 due to forestry. This would not affect the key characteristics of the setting and would result in a negligible magnitude of change.



10.12.37 Should the area be clear felled within the lifetime of the Proposed Development, visibility from the asset would be increased. This would however be minimal and turbines at the Development Site would remain separated from the asset by an area of clear-felled or restocked woodland, although the proximity of the Proposed Development would make them more visible. This may give rise to a low magnitude of change at worst, though this would reduce to negligible as the intervening plantation matures. As a result, **no significant adverse effect** on the setting of the asset would arise.

## Fardenreoch Cairn (HER 8018)

#### Importance and Present Setting

- 10.12.38 Fardenreoch Cairn is identified by the WoSAS NSR as almost certainly of national importance (although the NSR assessment is not recognised by any subsequent formal designation as previously noted).
- 10.12.39 This asset has been reassessed since the time of this classification as part of a cultural heritage assessment (Mudie 2011) for the extension of the Greenhill Surface Mine located 0.5km to the south of this asset. This assessment stated that the WoSAS NSR attribution of 'almost certainly of national importance' was given to the cairn as part of a desk-based project that did not incorporate a site visit in order to confirm the character and condition of the asset at the time. A site visit carried out in 2011 as part of the cultural heritage assessment for the Greenhill Surface Mine found that the cairn appeared to have been robbed of most, if not all, of its stone content. The outline of the cairn could be made out on the ground, defined by a slight turf mound and a slight arc of a bank around the southwest. The assessment further describes the land as being used for cultivation or pasture during the 19<sup>th</sup> and 20<sup>th</sup> centuries, resulting in little probability of a significant buried component surviving, although archaeological evidence of Bronze Age burial practices may remain. As a result of these observations, the cairn was considered to be of regional importance.
- 10.12.40 This cairn is situated on the western bank of a minor stream on a low rise within the surrounding rough grazing land. The land slopes upwards to the west of the asset. Within the immediate surroundings, there is evidence of later agricultural activity in the form of the remains of a dyke and farmstead, whilst in the wider area commercial forestry is present 0.5km to the west and the earthworks of Greenhill Mine are present 0.5km to the south.

## Change to setting

10.12.41 The ZTV and wireframe (**Figure 10.5**) suggests visibility of turbines in views from the asset looking south. Turbines would appear as distant features (8.6km to the nearest turbine) within an already industrial landscape due to the presence of the intervening Greenhill and House of Water surface mines. It is probable that the earthworks associated with the neighbouring surface mine would partially screen the Proposed Development, but this would be a temporary effect tied to the operational life of the mine.

#### Significance of Effect

10.12.42 Views of the proposed turbines from this asset would be partially screened by the earthworks associated with the Greenhill Surface Mine. The remaining visibility of turbines at 8.6km would not affect the key characteristics of the asset's setting and would produce a negligible magnitude of change. As a result, no significant adverse effect on the setting of the asset would arise.

# 10.13 Consideration of optional additional mitigation or compensation

- 10.13.1 Mitigation of adverse direct effects would be provided by the agreement of a written scheme of archaeological works with the WoSAS Archaeologist. This scheme would allow for the identification and recording of archaeological features within the Development Site which would otherwise be affected by the Proposed Development. This written scheme of works has been considered as an embedded environmental measure.
- 10.13.2 Mitigation and enhancement measures relating to visual effects is discussed more fully in **Chapter 9 Landscape and Visual Assessment**.

## **10.14 Conclusions of significance evaluation**

10.14.1 A summary of the results of the assessment of the historic environment is provided in **Table 10.6**.

Receptor and summary of predicted effects	Sensitivity/ importance/ value of receptor <sup>1</sup>	Magnitude of change <sup>2</sup>	Significance <sup>3</sup>	Summary rationale
Disturbance of known heritage assets	Low	None	Not significant	No known heritage assets would be affected by the Proposed Development.
Disturbance of as yet unknown heritage assets	Lesser – Low	Low ( <b>adverse</b> )	Not significant	The potential for as yet unknown heritage assets is considered to be low as described at <b>Section 10.11</b> . Any potential <b>adverse</b> effects would be mitigated by the adoption of a scheme of archaeological work agreed with the WoSAS Archaeologist.
Craigengillan Garden and Designed Landscape (GDL00111) and the associated Craigengillan House (LB A 18793), Craigengillan Stable Block (LB A 18794): change to setting	High	Low ( <b>adverse</b> )	Not significant	The ZTV shows no theoretical blade-tip visibility from Craigengillan House and stables. The Proposed Development would appear in sequential views as the observer moves around the Garden and Designed landscape, particular from the western edge of the designed landscape, but always as an element to the background of views and behind the enclosing higher ground to east of the designed landscape and would not discernibly cause an <b>adverse</b> effect to the key values of the asset.
The King's Cairn, Chambered Cairn and Cairn to West of Water of Deugh (SM 1046)	High	Low ( <b>adverse</b> )	Not significant	In the present context, there would be no adverse effect on the King's Cairn as views to the Development Site are precluded by the intervening forestry plantation. While there may be periods of felling during which visibility may increase slightly, the period for which turbines would be visible is likely to be restricted to a small proportion of the operational life of the Proposed Development during which time their visibility would not change the defining characteristics of its immediate historic landscape context. Consequently, for the majority of the operational life of the Proposed Development, visibility would be severely restricted or entirely precluded.

## Table 10.6 Summary of significance of adverse (or beneficial) effects

Sensitivity/ importance/ value of receptor <sup>1</sup>	Magnitude of change <sup>2</sup>	Significance <sup>3</sup>	Summary rationale
High	Negligible	Not significant	With the current setting of the asset, turbines would not be visible in simultaneous views of it from north on the B741 due to forestry and would not affect its key characteristics, leading to a negligible magnitude of change. Should the area be clear felled within the lifetime of the Proposed Development, visibility from the asset at a distance of 6.6km would be increased. This may give rise to a low magnitude of change at worst, though this would reduce to negligible as the intervening plantation matures.
High	Negligible	Not significant	Views of the proposed turbines from this asset would be partially screened by the earthworks associated with the Greenhill Surface Mine. The remaining visibility of turbines at this distance (8.6km) would not affect the key characteristics of the asset's setting.
	importance/ value of receptor <sup>1</sup> High	importance/ value of receptor1of change2HighNegligible	importance/ value of receptor1of change2HighNegligibleNot significantHighNegligibleNot significant

1. The sensitivity/importance/value of a receptor is defined using the criteria set out in **Section 10.10** above and is defined as very low, low, medium, high and very high.

2. The magnitude of change on a receptor resulting from activities relating to the development is defined using the criteria set out in **Section 10.10** and is defined as very low, low, medium, high and very high.

3. The significance of the environmental effects is based on the combination of the sensitivity/importance/value of a receptor and the magnitude of change and is expressed as major (significant), moderate (probably significant) or minor/negligible (not significant), subject to the evaluation methodology outlined in **Section 10.10**.

## 10.15 Assessment of cumulative effects

10.15.1 There are a large number of operational, consented or in-application wind energy developments in the area around the Development Site. In order to consider the effects of the Proposed Development when taken in combination with other wind energy developments, the cumulative baseline established for the Landscape and Visual Impact Assessment (Chapter 9 – Landscape and Visual Impact Assessment) has been used.

## Disturbance

10.15.2 There would be no cumulative effects arising through disturbance, as the effects of turbine construction, access tracks and associated infrastructure are considered limited to the footprint of the Proposed Development and would not meaningfully interact with the other wind energy developments noted above.

## **Change to Setting**

- 10.15.3 Consideration has been given as to whether any of the historic environment receptors that have been taken forward for assessment are likely to be subject to a change to setting resulting from indirect effects by the Proposed Development in combination with other developments.
- 10.15.4 Craigengillan GDL and the Dalnean Hill Scheduled monument within it lie to the west of the Proposed Development. The location of the Proposed Development means that the two turbines would appear in views behind the existing (under construction) South Kyle Wind Farm and consented Enoch Hill Wind Farm (E01 and C02 on **Figure 9.7**). The closer wind farms would occupy a larger, and closer, arc of view of turbines from the designated assets and the addition of the Proposed Development would not result in any additional perceptible visual intrusion. The Proposed Development would not increase the arc of view in which turbines are visible and would not bring the visible turbine arrays closer. Consequently, the addition of the Proposed Development in combination with other wind energy developments would not result in any discernible cumulative effect.
- 10.15.5 At present, there are considered to be no adverse effects on Kings Cairn due to its location within forestry; although if felling and replanting were to occur, the effect may rise to a low magnitude for short periods as a result of views opening up of the turbine array. When considering cumulative effects, the two turbines of the Proposed Development would be seen in the context of, and behind closer wind energy developments to the north (e.g., consented Enoch Hill Wind Farm ('C02') on **Figure 9.7**), and the existing Brockloch Rig extension (E02 on **Figure 9.7**) to the north-east. The Proposed Development would not increase the arc of view in which turbines are visible and would not bring the visible turbine arrays closer. Consequently, the addition of the Proposed Development in combination with other wind energy developments would not result in any discernible cumulative effect on Kings Cairn.

## 10.16 Implementation of environmental measures

10.16.1 **Table 10.7** describes the environmental measures embedded within the Proposed Development and the means by which they would be implemented.

## Table 10.7 Summary of Historic Environment related environmental measures

Environmental measure	Responsibility for implementation	Compliance mechanism
Agreement of written scheme of archaeological works	Contractor	Planning Condition