

**8 Cultural Heritage Desk Based Assessment**

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## **8. Cultural Heritage Desk-Based Assessment**

### **8.1. Non-Technical Summary**

- 8.1.1. The archaeology and cultural heritage assessment considers potential direct and indirect physical impacts related to construction of the Proposed Development on the fabric of heritage assets within the Site. It also considers impacts on the settings of heritage assets within and outside the Site that could affect heritage assets' cultural significance.
- 8.1.2. A desk-based baseline assessment including a 'Stage 1' Setting Assessment was undertaken to identify known heritage assets and the potential for currently unrecorded heritage assets to be present within the Site, as well as assets in the wider landscape which may be impacted by the Proposed Development through changes to their setting.
- 8.1.3. The desk-based baseline assessment includes a Study Area that comprises a 2 km buffer zone beyond the proposed development area (Application Boundary), within which the archaeological and historical development of the site and surrounding area is discussed. In accordance with national and local planning policy and guidance, the possible impacts that the proposed development could have on known and potential below-ground archaeological remains within the Application Boundary are considered, and the setting of heritage assets is considered.
- 8.1.4. There are no designated heritage assets within the Application Boundary and three designated heritage assets within the 2 km Study Area (Figure 8.1 Designated Heritage Assets within the Study Area). These comprise Clach Clais an Tuire standing stone (SM441), Achvarasdal House Standing Stones (SM421) and Achvarasdal House Broch (SM514).
- 8.1.5. There are no non-designated heritage assets recorded by the Highland HER within the Application Boundary. There are 113 non-designated heritage assets within the Study Area (Figure 8.2 Non-Designated Heritage Assets within the Study Area). These are primarily located on the low-lying land to the north of the Application Boundary with only seven non-designated assets located across the moorland and plantation to the south. There are 51 non-designated assets related to prehistoric activity with hut circles and cairns the predominant asset types. Of the remaining non-designated assets, 53 are dated to the post-medieval period, mostly comprising enclosures, field boundaries and farmsteads. Nine of the non-designated assets are undated. As part of the assessment no additional heritage assets were identified.
- 8.1.6. Pre-application advice provided by The Highland Council (THC) indicated that the proposals had the potential to impact the setting of the scheduled monument: Clach Clais an Tuire, standing stone 1000m SE of Loanscoribest (SM441). In order to allow for an assessment of the level of impact the proposals would have on the setting of the monument THC requested a visualisation should be produced from the stone looking southwest between Creag Bheag

and Creag Mor (Cultural Heritage View Point (CHVP) 01). The visualisations (Chapter 5 – Landscape and Visual) supported the findings that there would be no visual change to the setting of the monument from construction of the BESS.

- 8.1.7. The Stage 1 setting assessment identified that the wider landscape setting contributed to the significance of 14 of the heritage assets within the Study Area. These had the potential to be subject to impact through change in their settings from the development. These comprised eight funerary cairns, five ritual monuments and one settlement asset.
- 8.1.8. This assessment found that the significance of the three scheduled monuments within the Study Area would not be affected as a result of visual changes within their setting resulting from the proposed BESS development. It was found that an adverse effect, through visual change within its setting of one non-designated assets (MHG738 Borag Knowe cairn). However, the construction of the substation Extension would not add significant change to the existing extant infrastructure in this location and therefore, this adverse effect is unlikely to be of such magnitude to warrant a refusal of consent for the proposed development. No further work is recommended in this regard.
- 8.1.9. The proposed BESS is planned to be constructed across an area of land that had previously been the construction compound during the development of the Limekiln Wind Farm and the Limekiln Wind Farm Extension. Access to the proposed BESS will also utilise existing access tracks constructed during the construction of the wind farm. Therefore, this assessment identifies that there is a nil potential for below ground archaeological remains to be present within the footprint of the proposed development from any period. As a results, no further archaeological mitigation is recommended during the construction of the facility.
- 8.1.10. It is not anticipated that the proposals to develop the BESS should represent a conflict with legislation or national or local planning policies. The likely development impacts are not considered sufficiently significant to warrant refusal of a planning application to develop the BESS. It is unlikely the local planning authority will require further archaeological investigation as a condition of consent.

Figure 8.1 Site plan showing the designated heritage assets within the study area

Figure 8.2 Site plan sowing the non-designated heritage assets within the study area

## 8.2. INTRODUCTION

### Planning Background

- 8.2.1. The historic environment is defined as “the physical evidence for past human activity. It connects people with place, and with the traditions, stories, and memories associated with places and landscapes’ in ‘Our Past, Our Future: The Strategy for Scotland’s Historic Environment’ (2023, 10) and in National Planning Framework 4 (NPF4) as “the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand” (Annex A – Glossary of Definitions). These documents present the Scottish Government’s strategy for the protection and promotion of the historic environment.

- 8.2.2. The Policy Intent of NPF4 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.”
- 8.2.3. This report describes and assesses the significance of known heritage assets and potential archaeological remains within the Application Boundary. It provides an assessment of the likely impact of the proposed development on the significance of heritage assets, including upon the contribution made by their setting, in order to identify potential historic environment planning constraints.
- 8.2.4. This approach is consistent with the requirements of national and local planning policies on the historic environment in the planning process (see Part 2).

### Consultation

- 8.2.5. Pre-application advice was sought by the client from The Highland Council (Ref:24/04672/PREMAJ; 25 February 2025). The response from The Highland Council included advice related to built and cultural heritage.

- 8.2.6. It was stated in the response that:

*The proposals have the potential to impact the setting of the scheduled monument: Clach Clais an Tuire, standing stone 1000m SE of Loanscorribest (SM441). The location of the BESS within the proposal's red line boundary suggests that it would be visible in views from the monument, approximately 1.3 km to the southwest.*

*In order allow for an assessment of the level of impact the proposals would have on the setting of the monument (Clach an Tuire standing stone – SM441), a visualisation should be produced from the stone looking southwest between Creag Bheag and Creag Mor. Ideally, this should be a photomontage, but a wireframe may suffice if views are currently obscured. Although the current forestry plantation obscures parts of this view, forestry is not considered as appropriate mitigation or screening in the assessment of setting impacts.*

- 8.2.7. A scoping request for an Environmental Impact Assessment was submitted by Boralex (22 April 2025) to the Energy Consents Unit of the Scottish Government. In this request it was stated that:

*The setting assessment (for Clach an Tuire standing stone) will form part of a cultural heritage desk-based assessment (this report) and heritage statement in support of the application. This report will take into account all relevant national and local planning regulation and guidance and will include consultation with all relevant stakeholders.*

*It is not anticipated that proposals to develop the site should represent a conflict with legislation or national or local planning policies relating to the historic environment. The likely development impacts are not considered sufficiently significant to warrant an EIA.*

- 8.2.8. A screening opinion was received from Scottish Ministers (06 May 2025) in respect of a proposed application under section 36 of the Electricity Act 1989 (“the Electricity Act”) to

construct and operate a battery energy storage system. In the response the Scottish Ministers have adopted the opinion that the proposal does not constitute EIA development, and that the application submitted for this development does not require to be accompanied by an EIA report.

### Site Location and Description

- 8.2.9. The proposed BESS facility is to be located on land previously used as a construction compound to facilitate the construction of Limekiln Wind Farm and Limekiln Wind Farm extension. The Application Boundary extends approximately 32 hectares (ha) with access taken from the A836, utilising the existing Limekiln Wind Farm access tracks. The Application Boundary for the site is shown in Figure 2.1.
- 8.2.10. Prior to the construction of the wind farm the land comprised areas of open moorland and commercial forestry. The Application Boundary is larger than the final development footprint. This is to allow flexibility in final design, which will be influenced by ongoing assessment work and feedback from consultation.
- 8.2.11. The site is rural in nature with a small number of neighbouring residential properties. The nearest residential properties include the village of Reay and New Reay 2 km to the north. At a wider topographical scale, the landscape comprises undulating moorland interspersed with commercial forestry. The main waterways across the area include the Sandside Burn to the west and the Achvarasdal Burn to the east, both of which flow into the Sandside Bay to the north.

## 8.3. Legislation, Policy And Guidance

### Statutory Protection

- 8.3.1. Scheduled Monuments and Listed Buildings are protected by statute.
- 8.3.2. The relevant heritage legislation in the context of the present site is described in table 8.1 below.

**Table 8.1 Historic Environment Statutory Legislation**

Legislation	Key Issues
Historic Environment Scotland Act 2014	The Act defines the role of the public body, Historic Environment Scotland (HES), and the processes for the designation of heritage assets, consents and rights of appeal.
Ancient Monuments and Archaeological Areas Act 1979	It is a criminal offence to carry out any works on or near to a Scheduled Monument without Scheduled Monument Consent. Development must preserve in-situ protected archaeological remains and landscapes of acknowledged significance and protect their settings.

<p><a href="#">The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997</a></p>	<p>Provides for statutory protection of listed buildings and conservation areas. No physical works can be carried out in relation to a listed building and its curtilage without listed building consent. It introduces a requirement to have special regard to the desirability of preserving the building or its setting in considering any Development which may affect these. In conservation areas, the designation introduces general controls to conserve character and appearance within the conservation area.</p>
<p><a href="#">Town and Country Planning (Scotland) Act 1997; Planning etc (Scotland) Act (Scotland) 2006</a></p>	<p>Establishes framework for determining planning applications, the role of the local planning authority and the role of Development (Structure and Local) Plans within the process.</p>

## National Planning Framework

- 8.3.3. NPF4 Part 1 A National Spatial Strategy for Scotland 2045 describes how the future spatial development of Scotland can contribute to planning outcomes. It shows where there will be opportunities for growth and regeneration, investment in the low carbon economy, environmental enhancement, and improved connections across the country.
- 8.3.4. Historic Environment Policy for Scotland (HEPS) defines the Historic Environment and Scottish Government Policy. It sets out the vision and key principles on how to care for and protect Scotland's historic environment including designations of ancient monuments, principles for scheduling and listing, contexts for conservation areas, marine protected areas, gardens and designated landscapes, historic battlefields and consents and advice. HEPS provides further policy direction to NPF4 and sets out high level policies and core principles for decision-making affecting the historic environment.
- 8.3.5. The Scottish Government's planning policies in relation to the historic environment are set out in NPF4 Part 2 National Planning Policy (The Scottish Government, February 2023) Policy 7: Historic assets and places
- 8.3.6. "Policy Principles include:
- *Policy Intent: To protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.*
  - *Policy Outcomes: The historic environment is valued, protected, and enhanced, supporting the transition to net zero and ensuring assets are resilient to current and future impacts of climate change; Redundant or neglected historic buildings are brought back into sustainable and productive uses; Recognise the social,*

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*environmental and economic value of the historic environment, to our economy and cultural identity.*

- *Local Development Plans: LDPs, including through their spatial strategies, should support the sustainable management of the historic environment. They should identify, protect and enhance valued historic assets and places. “*

8.3.7. NPF4 Policy 7 applies these principles to designated and non-designated assets. Those relevant to the current assessment are as follows:

*NPF4 – Part 2: Historic Assets and Places Policy 7*

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

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

*h) Development proposals affecting scheduled monuments will only be supported where:*

- direct impacts on the scheduled monument are avoided;*
- significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or*
- exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.*

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

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

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

### **Local Planning Policy**

8.3.8. The Highland Council are currently preparing a new Local Development Plan for the Highlands'. The local historic environment policies relevant to this assessment can be found



in the Highland Local Development Plan, which was formally adopted in 2016<sup>1</sup>. The relevant policies are;

*Policy 57 Natural, Built and Cultural Heritage*

8.3.9. This states:

*'All development proposals will be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting, in the context of the policy framework. The following criteria will also apply:*

*1. For features of local/regional importance we will allow developments if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource.*

*2. For features of national importance, we will allow developments that can be shown not to compromise the natural environment, amenity and heritage resource. Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services.*

*3. For features of international importance developments likely to have a significant effect on a site, either alone or in combination with other plans or projects, and which are not directly connected with or necessary to the management of the site for nature conservation will be subject to an appropriate assessment. Where we are unable to ascertain that a proposal will not adversely affect the integrity of a site, we will only allow development if there is no alternative solution and there are imperative reasons of overriding public interest, including those of a social or economic nature. Where a priority habitat or species (as defined in Annex 1 of the Habitats Directive) would be affected, development in such circumstances will only be allowed if the reasons for overriding public interest relate to human health, public safety, beneficial consequences of primary importance for the environment, or other reasons subject to the opinion of the European Commission (via Scottish Ministers). Where we are unable to ascertain that a proposal will not adversely affect the integrity of a site, the proposal will not be in accordance with the development plan within the meaning of Section 25(1) of the Town and Country Planning (Scotland) Act 1997.*

8.3.10. In due course the Council also intends to adopt the Supplementary Guidance on the Highland Historic Environment Strategy. The main principles of this guidance will ensure that:

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<sup>1</sup> [https://www.highland.gov.uk/info/178/development\\_plans/199/highland-wide\\_local\\_development\\_plan](https://www.highland.gov.uk/info/178/development_plans/199/highland-wide_local_development_plan)



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- Future developments take account of the historic environment and that they are of a design and quality to enhance the historic environment bringing both economic and social benefits;
  - It sets a proactive, consistent approach to the protection of the historic environment.

### Guidance

- 8.3.11. Standards and Guidance published by the Chartered Institute for Archaeologists (CIfA) have been followed in preparing this assessment, in particular the 'Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment' (2014, updated 2020), the 'Standard and guidance for historic environment desk-based assessment' (2014, updated 2017 & 2020) and Code of Conduct (2014, revised 20192).
- 8.3.12. HES also provides guidance on how to apply NPF4 Policy 7 in a series of documents entitled 'Managing Change in the Historic Environment' (MCHE). These provide guidance to planning authorities and stakeholders regarding key issues relating to development, the planning process, and key issues pertaining to the historic environment.
- 8.3.13. Most relevant to this assessment are the guidance notes covering Setting (June 2016 updated 2020).
- 8.3.14. HES published Designation Policy and Selection Guidance (DPSG, 2019) to accompany HEPS. DPSG outlines the policy and selection guidance used by HES when designating sites and places of national importance.
- 8.3.15. Planning Advice Note (PAN) 2/2011: Planning and Archaeology provides local government officers with technical advice to planning authorities and developers on dealing with archaeological remains. Among other issues it considers the balance in planning decisions between the preservation in situ of archaeological remains and the benefits of development; setting; the circumstances under which developers can be required to provide further information, in the form of a field evaluation to allow planning authorities to reach a decision; and measures that can be taken to mitigate adverse impacts.
- 8.3.16. This DBA has also been prepared with reference to IEMA, IHBC and CIfA's July 2021 publication Principles of Cultural Heritage Impact Assessment in the UK<sup>3</sup>. This document

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<sup>2</sup> [https://www.archaeologists.net/sites/default/files/Code%20of%20conduct%20revOct2019\\_0.pdf](https://www.archaeologists.net/sites/default/files/Code%20of%20conduct%20revOct2019_0.pdf)

<sup>3</sup> [https://www.archaeologists.net/sites/default/files/j30361\\_iema\\_principlesofchia\\_v8.pdf](https://www.archaeologists.net/sites/default/files/j30361_iema_principlesofchia_v8.pdf)

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presents the principles of and suggests good practice for assessment of the impact of a development proposal on cultural heritage assets.

### **Professional Standards and Acknowledgements**

- 8.3.17. Headland Archaeology (UK) is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA), an audited status which confirms that all work is carried out in accordance with the highest standards of the profession.
- 8.3.18. Headland Archaeology (UK), as part of the RSK Group, is recognised by the Institute of Historic Building Conservation (IHBC) under their 'Historic Environment Service Provider Recognition' scheme. This quality assurance standard acknowledges that RSK works to the conservation standards of the IHBC, the UK's lead body for built and historic environment practitioners and specialists.
- 8.3.19. Headland Archaeology (UK) operates a quality management system to help ensure all projects are managed in a professional and transparent manner, which enables it to qualify for ISO 9001 (Quality Management), ISO 45001 (health and safety management) and ISO 14001 (environmental management).
- 8.3.20. Ordnance Survey data is produced under © Crown copyright and database rights Licence AC0000811465.

## **8.4. Aims and Objectives**

- 8.4.1. The aim of this DBA is to inform determination of a planning application for development of a BESS facility and an extension to the existing Limekiln Wind Farm Substation, in relation to its likely impact on the historic environment. The assessment aims to identify all known heritage assets potentially affected by the proposed development, and the potential for currently unknown heritage assets.
- 8.4.2. The purpose is to gain an understanding of the historic environment resource to formulate an assessment of the potential for heritage assets to survive within the Application Boundary, their significance, and strategies for further evaluation, mitigation or management as appropriate.
- 8.4.3. The CIfA's Standard and Guidance for Historic Environment Desk-Based Assessment (20204) defines a DBA as '...a programme of study of the historic environment within a specified area or site on land, the inter-tidal zone or underwater that addresses agreed

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[4 https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA\\_4.pdf](https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA_4.pdf)

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research and/or conservation objectives. It consists of an analysis of existing written, graphic, photographic and electronic information in order to identify the likely heritage assets, their interests and significance and the character of the Study Area, including appropriate consideration of the settings of heritage assets and, in England, the nature, extent and quality of the known or potential archaeological, historic, architectural and artistic interest. Significance is to be judged in a local, regional, national or international context as appropriate.'

8.4.4. NPF4 Policy 7.a requires that "Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place." This DBA therefore determines, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment or will identify the need for further evaluation to do so.

8.4.5. The objectives are therefore to:

- Collate all available written, graphic, photographic and electronic information relevant to the Application Boundary;
- Describe the nature, extent and significance and importance of the historic environment within the area potentially affected by the development, identifying any uncertainties in existing knowledge;
- Determine the potential for previously unknown archaeological remains;  
Identify heritage assets beyond the Application Boundary that may be affected by development within their setting, to describe their significance and the contribution made by their setting, and assess how this significance may be affected by the proposed development; and
- Understand and identify the likelihood that the planning authority may require further investigations.

## 8.5. Methodology

### Stages of Assessment

8.5.1. This historic environment impact assessment is carried out in the following stages:

- Definition of baseline conditions, comprising desk-based study and visits to heritage assets if necessary, leading to the identification of the cultural significance and importance of heritage assets potentially affected;
- Assessment of impacts (physical (direct/indirect) and setting) of the proposed development on cultural significance of heritage assets; and
- Proposal of further assessment and/or mitigation measures to minimise adverse impacts.

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## Identification of Heritage Assets

### Desk Based Assessment and Field Visits

#### Study Area

- 8.5.2. The Study Area for this assessment comprises a 2 km buffer surrounding the Application Boundary, within which the archaeological and historical development of the site and surrounding area has been considered for the purposes of assessment of archaeological potential.

#### Data Sources

- 8.5.3. The assessment has been based on a study of all readily available documentary sources, following the ClfA Standards and Guidance. The following sources of information were referred to:
- Designation data downloaded from the Historic Environment Scotland website in April 2025;
  - Historic Environment Record (HER) data, digital extract received from Highland Council HER; Downloaded March 2025
  - The National Record of the Historic Environment (NRHE), including the Canmore database and associated photographs, prints/drawings and manuscripts held on the trove.scot platform managed by HES;
  - Historic Landuse Assessment data, viewed through the HLAMap website;
  - Historic maps and plans held the National Library of Scotland;
  - Geological data available online from the British Geological Survey<sup>5</sup>;
  - Readily available published sources and unpublished archaeological reports.
  - A zone of theoretical visibility (ZTV).
- 8.5.4. Heritage assets within the Study Area are shown on Figures 8.1 and 8.2, with detailed descriptions compiled in a Gazetteer (Appendix 8.1).
- 8.5.5. Designated heritage assets are labelled with the reference number assigned to them by HES (prefixed SM for Scheduled Monuments, and LB for Listed Buildings); non-designated assets
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<sup>5</sup> <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

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are labelled with the reference number in the HER or the NRHE. Previously unrecorded heritage assets within the Application Boundary have been assigned a number (prefixed HA for Heritage Asset). A single asset number can refer to a group of related features, which may be recorded separately in the HER and other data sources.

#### Field Visit

- 8.5.6. A field visit was undertaken on 22nd May 2025, during which notes were made regarding site characteristics, any visible archaeology and geographical/geological features which may have a bearing on previous land use and archaeological survival, as well as those which may constrain subsequent archaeological investigation.
- 8.5.7. Records were made regarding extant archaeological features, such as earthworks or structural remains, any negative features, local topography and aspect, exposed geology, soils, watercourses, health and safety considerations, surface finds, and any other relevant information.

#### Historic Map Regression

- 8.5.8. The historic Ordnance Survey (OS) mapping sequence corresponding with the Application Boundary was consulted to collect information on former land use and development throughout the later historic periods.

#### Potential for Unknown Heritage Assets

- 8.5.9. The likelihood that undiscovered heritage assets may be present within the Application Boundary is referred to as archaeological potential. Overall levels of potential can be assigned to different areas of the Application Boundary, while recognising that the archaeological potential of any area will relate to particular historical periods and types of evidence.
- 8.5.10. The following factors are considered in assessing archaeological potential:
- The distribution and character of known archaeological remains in the vicinity, based principally on an appraisal of data in the HER;
  - The history of archaeological fieldwork and research in the surrounding area, which may give an indication of the reliability and completeness of existing records;
  - Environmental factors such as geology, topography and soil quality, which would have influenced land-use in the past and can therefore be used to predict the distribution of archaeological remains;
  - Land-use factors affecting the survival of archaeological remains, such as ploughing or commercial forestry planting; and
  - Factors affecting the visibility of archaeological remains, which may relate to both environment and land-use, such as soils and geology (which may be more or less conducive to formation of cropmarks), arable cultivation (which has potential to show cropmarks and create surface artefact scatters), vegetation, which can conceal

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upstanding features, and superficial deposits such as peat and alluvium which can mask archaeological features.

- 8.5.11. The likelihood that the Application Boundary may contain undiscovered heritage assets, their likely location and potential density, and their likely level of importance is assessed, described, and justified.

### Limitations of Baseline Data

- 8.5.12. Information held by public data sources is generally considered to be reliable; however, the following general points are noted:

- Documentary sources are rare before the medieval period;
- Whilst it is accepted that historic documents may be biased depending on the author, with content seen through the lens of context, wherever such documentary sources are used in assessing archaeological potential professional judgment is used in their interpretation in that the functionality of the document is considered;
- HER records can be limited because opportunities for research, fieldwork and discovery depend on the situation of commercial development and occasional research projects, rather than the result of a more structured research framework. A lack of data within the HER records does not necessarily equal an absence of archaeology;
- Where archaeological sites have been identified solely from aerial imagery without confirmation from archaeological excavation or supporting evidence in the form of find-spots for example, it is possible the interpretation may be revised in the light of further investigation;
- The significance of sites can be difficult to identify from HER records, depending on the accuracy and reliability of the original source;
- There can often be a lack of dating evidence for archaeological sites; and
- Any archaeological field visit has inherent limitations, primarily because archaeological remains below ground level may have no surface indicators.

### Terminology – ‘Significance’ and ‘Importance’

#### Cultural Significance

- 8.5.13. Cultural heritage impact assessment is concerned with effects on cultural significance, which is a quality that applies to all heritage assets, and as defined by Historic Environment Scotland (Environmental Impact Assessment Handbook, NatureScot & HES 2018, v5 Appendix 1 page 175), relates to the ways in which a heritage asset is valued both by specialists and the public. The cultural significance of a heritage asset will derive from factors including the asset's fabric, setting, context and associations. This use of the word ‘significance’, referring to the range of values attached to an asset, should not be confused with the unrelated usage in EIA where the significance of an effect reflects the weight that should be attached to it in a planning decision.



8.5.14. Cultural significance is assessed in relation to the criteria in DPSG Annexes 1-6, which are intended primarily to inform decisions regarding heritage designations but may also be applied more generally in identifying the 'special characteristics' of a heritage asset, which contribute to its significance and should be protected, conserved and enhanced according to the NPF4 Policy Principles. DPSG Annex 1 is widely applicable in assessing the cultural significance of archaeological sites and monuments, for instance, while the criteria in Annex 2 can be used in defining the architectural or historic interest of buildings, whether listed or not. Cultural significance of assets is considered in terms described in DPSG Annex 1:

- **Intrinsic Characteristics** - those inherent in the monument i.e., "*how the physical remains of a site or place contribute to our knowledge of the past*";
- **Contextual Characteristics** – those relating to the monument's place in the landscape or in the body of existing knowledge i.e., "*how a site or place relates to its surroundings and/or to our existing knowledge of the past*"; and
- **Associative Characteristics** – subjective associations, including those with current or past aesthetic preferences i.e., "*how a site or place relates to people, practices, events and/or historic and social movements*".

#### Assessment of Importance

8.5.15. Relative importance of each identified heritage asset potentially affected by the proposed development has been determined to provide a framework for comparison between different heritage assets and to inform subsequent stages of archaeological assessment and the development of any appropriate mitigation which may be required (See Table 8.2 below).

8.5.16. The importance of a heritage asset is the overall value assigned to it based on its cultural significance, reflecting its statutory designation or, in the case of non-designated assets, the professional judgement of the assessor. Heritage assets of national importance and international importance are assigned a high and very high level respectively. Scheduled Monuments, Inventory Gardens and Designed Landscapes, Inventory Historic Battlefields and Historic Marine Protected Areas are, by definition, of national importance.

8.5.17. The criterion for Listing is that a building is of 'special architectural or historic interest'; following DPSG Annex 2.19, Category A refers to 'outstanding examples of a particular period, style or building type', Category B to 'major examples of a particular period, style or building type', and Category C to 'representative examples of a particular period, style or building type'.

8.5.18. Heritage Assets are defined as "Features, buildings or places that provide physical evidence of past human activity identified as being of sufficient value to this and future generations to merit consideration in the planning system" (NatureScot & HES 2018, Environmental Impact Assessment Handbook, v5, p.122). Thus, any feature which does not merit consideration in planning decisions due to its cultural significance may be said to have negligible heritage importance; in general, such features are not considered as heritage assets and are excluded from the assessment.

- 8.5.19. Heritage assets for which a level of importance cannot be defined based on current information are defined as 'Uncertain' Importance.

**Table 8.2 Criteria for Assessing the Importance of Heritage Assets**

Importance of the Asset	Criteria
Very High (International)	World Heritage Sites and other assets of equal international importance, that contribute to international research objectives
High (National)	Scheduled Monuments, Category A Listed Buildings, Inventory Gardens and Designed Landscapes, Inventory Battlefields, Historic Marine Protected Areas, some conservation areas and non-designated assets that meet the relevant criteria for designation in the opinion of the assessor. Category B or C-listed buildings where the existing designation does not adequately reflect their value, in the opinion of the assessor, and other assets of equivalent importance that contribute to national research objectives
Medium (National or Regional)	Category B Listed Buildings, some conservation areas and non-designated assets of similar value in the opinion of the assessor. Category C-listed buildings where the existing designation does not adequately reflect their value, in the opinion of the assessor, and other assets that contribute to regional research objectives
Low (Local)	Category C Listed Buildings and locally listed (non-designated) heritage assets, except where their particular characteristics merit a higher level of importance. Non-designated heritage assets of Local importance, including assets that may already be partially damaged
Negligible	Identified historic remains of no importance in planning considerations, or heritage assets and findspots that have already been removed or destroyed (i.e. 'site of') (e.g. through quarrying or archaeological excavation)
Unknown / Uncertain	Heritage assets for which a level of importance cannot be defined on current information

*Source: NatureScot & HES 2018, Environmental Impact Assessment Handbook, v5 Appendix 1, Figure 2*

- 8.5.20. The importance of heritage assets that may be affected by the proposed development is identified in the DBA's Impact Assessment section and summarised in the Gazetteer (Appendix 8.1).

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## Impact Assessment

8.5.21. Impacts of the proposed development on the historic environment can arise through direct/indirect physical impacts, or impacts through change within their setting:

- Direct physical impacts describe those activities of the proposed development that directly cause damage to the fabric of a heritage asset. Typically, these activities are related to construction works and will only occur within the Application Boundary.
- Indirect impacts describe secondary processes, triggered by the proposed development, that lead to the degradation or preservation of heritage assets. For example, changes to hydrology may affect archaeological preservation; or changes to the setting of a building may affect the viability of its current use and thus lead to dereliction. May occur within or outwith the Application Boundary.
- An impact on the setting of a heritage asset occurs when the presence of the proposed development changes the surroundings of a heritage asset in such a way that it affects (beneficially or adversely) the cultural significance of that asset. Visual impacts are most commonly encountered but other environmental factors such as noise, light or air quality can be relevant in some cases. Impacts may be encountered at all stages in the life cycle of a development from construction to decommissioning but they are only likely to lead to significant effects during the prolonged operational stage of the development. May occur within or outwith the Application Boundary.

8.5.22. Identified impacts upon heritage assets for which a level of importance cannot be defined based on current information are defined as 'Uncertain'. In accordance with NPF4 Policy 7.o (The Scottish Government, February 2023), 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.

8.5.23. In all cases conclusions will be expressed in terms of the relevant Legislation and/or Policy tests.

### Physical Impacts

8.5.24. Direct or indirect impacts on known or unknown heritage assets are discussed in terms of the risk that an impact could occur. The level of risk depends on the location of known heritage assets, or the level of archaeological potential, in comparison with the physical location, nature and scale of disturbance associated with proposed construction activities in different areas of the Application Boundary.

### Setting Effects

8.5.25. The special characteristics which contribute to an asset's cultural significance may include elements of its setting. Setting is defined in 'Managing Change in the Historic Environment: Setting' (HES 2016 updated 2020, Section 1) as "the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced".

- 8.5.26. NPF4 does not define 'integrity' in the context of Policy 7.h, therefore for the purposes of the assessment, HES recommend that the following shared definition for the concept of integrity of setting is used: 'changes to factors of setting that contribute to cultural significance such that the understanding, appreciation and experience of an asset are not adequately retained will affect the integrity of setting.'
- 8.5.27. Visual impacts are most commonly encountered but other introduced environmental factors can affect setting such as noise, light or air quality. Setting impacts may be encountered at all stages in the life cycle of a development from construction to decommissioning but they are only likely to lead to substantial harm during the prolonged operational life of the development.
- 8.5.28. The setting of a heritage asset is defined and analysed according to Stage 2 of the three-stage approach promoted in 'MCHE: Setting', with reference to factors listed on pages 9-10. The relevance of these factors to the understanding, appreciation and experience of the asset determines how, and to what extent, an asset's cultural significance derives from its setting. All heritage assets have settings; however, in some cases, setting may contribute very little to the asset's significance, or only certain elements of the setting may be relevant.
- 8.5.29. Heritage assets screened as sensitive to visual change were visited and assessed with a view to potential setting impacts. The field visit enabled assessment of likely impacts of the proposed development: locations which would remain unaffected, locations which have some visibility but that is minimal and does not affect the baseline condition, and locations where visibility is possible/prominent.
- 8.5.30. The scope of this DBA is limited to identifying where no substantial setting impacts are anticipated requiring no further works, or where substantial setting impacts are anticipated, to identify which heritage assets are considered likely to be affected, and to make recommendations for proportionate further detailed assessments.

### **Mitigation: Minimising Harm**

- 8.5.31. Assessment of impacts is an iterative part of the design process. For any identified effect the preferred mitigation option is always to avoid or reduce effects through design, or through precautionary measures such as fencing off heritage assets during construction works to avoid accidental direct effects.
- 8.5.32. In accordance with NPF4 Policy 7.o (The Scottish Government, February 2023), known heritage assets and their settings should be preserved in situ wherever possible.

## **8.6. Results**

### **Overview Of The Historic Environment**

- 8.6.1. The full list of known heritage assets is presented in the gazetteer (Appendix 8.1), and the location of each is shown on Figures 8.1 and 8.2.

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### Application Boundary

- 8.6.2. There are no heritage assets within the Application Boundary.

### Study Area

- 8.6.3. There are no Inventory Garden and Designed Landscapes (IGDL), Inventory Battlefields (BF), Listed Buildings (LB) or Conservation Areas (CA) within the Application Boundary or Study Area. The closest IGDL to the Application Boundary lies c. 30 km to the east at Barrogill Castle (GDL00096). The closest recorded BF is located 80 km to the south, namely the Battle of Carbisdale (BTL19). The nearest LBs are in the village of Reay just beyond the 2 km study area. These comprise the Category A Reay Parish Church (LB4992) and the Category B listed Reayburn House (LB17592). There are also further listed buildings at New Reay 2.5 km to the north and at Sandside House on the coast 3 km north off the Application Boundary. The closest CA is Thurso (CA125), 15 km east of the Application Boundary.
- 8.6.4. There are three scheduled monuments within the Study Area. These comprise two standing stones (SM441 Clach Clais an Tuire and SM421 Achvarasdal House and a Broch (SM514 Achvarasdal House).
- 8.6.5. There are 113 non-designated heritage assets within the Study Area. These are primarily located to the low-lying land across the northern half of the study area with only seven known assets located across the higher areas of moorland and plantation to the south. There are 51 non-designated assets related to Prehistoric occupation of the area with hut circles and cairns the predominant two asset types. Of the remaining non-designated assets, 53 are dated to the post-medieval period, mostly comprising enclosures, field boundaries and farmsteads. Nine of the non-designated assets are undated.
- 8.6.6. The significance of these assets is discussed by period in the Assessment of Heritage Significance (Section 6) below.

### Geology and Topography

- 8.6.7. The underlying solid geology is recorded by BGS as Portskerra Psammite Formation, a metamorphic bedrock formed between 1000 and 541 million years ago between the Tonian and Ediacaran periods<sup>6</sup>. Superficial deposits are recorded as large areas of peat plus a mix of hummocky glacial deposits including sand, gravel and boulders. Sedimentary superficial deposit formed between 2.588 million and 11.8 thousand years ago during the Quaternary period.

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<sup>6</sup> BGS, <http://mapapps.bgs.ac.uk/geologyofbritain/home.html> viewed 13/05/2025

- 8.6.8. The Application Boundary is situated within an undulating landscape leading down to a relatively low-lying flat landscape as it reaches the coastline to the north. The highest point of the Application Boundary lies at 125 m AOD close to Cnocann Dubh nan Eun (128 m AOD). The main waterways across the area include the Sandside Burn to the west and the Achvarasdal Burn to the east both of which flow into the Sandside Bay to the north.

#### **Historic Landscape Assessment (HLA)**

- 8.6.9. Historic Landscape Assessment of the study area (<https://map.hlamap.org.uk>) defines the Application Boundary as: Plantation comprising densely planted, single age, coniferous species, within clearly defined straight boundaries, with regular, linear firebreaks. No past use of the area is given, though prior to planting of the conifers the whole Application Boundary would have been open moorland as depicted on the early Ordnance Survey (OS) mapping. Two small areas of traditional peat cutting are recorded. Cutting peat used to be the main way of gathering fuel across Scotland in areas where there were few trees, particularly in the north and west of the country. As well as the cuttings, various other features are associated with this land use. For instance, in some area's peat stands were built alongside the cuttings for stacking and drying the cut wet blocks. Tracks were also created across the moorland to bring the dried peats out by pony.
- 8.6.10. The Application Boundary is currently part of the recently operational Limekiln Wind Farm, comprising 24 turbines across c.7000 ha of moorland and forestry.

#### **Previous investigations**

- 8.6.11. Within the Study Area there are 12 archaeological events recorded in the Highland HER. Eight are archaeological studies related to the construction of Limekilns Wind Farm and the Limekilns Wind Farm Extension. These include desk-based assessments, walkovers and watching briefs during the wind farm's construction. This work identified several previously unrecorded heritage assets across the Study Area. The watching brief also recorded several archaeological features within the wind farm development. The majority of these were related to post-medieval draining of the moorland although one feature provided evidence of early Bronze Age activity in the area. This comprised a spread of burnt material that provided a date range between 2466 cal BC and 2297 cal BC. Although little is known about the nature of the deposit, the evidence implies occupation and landscape exploitation in the vicinity.
- 8.6.12. The remaining archaeological events in the Study Area comprised a walkover survey (EHG6309) and watching brief (EHG6310) in advance of the Dounreay 33kV 7L5 and 8L5 rebuild project, a pre-afforestation survey at Achrasker (EHG375) and a photographic survey of a barn at Borlum House (EHG2960). The walkover and watching brief at Dounreay recorded no previously unknown heritage assets and no archaeological features. The pre-afforestation survey at Achrasker recorded a cairnfield and the remains of a farmstead and its associated dykes and cultivation remains. The photographic survey of the barn at Borlum House was carried out to comply with a condition on planning consent for conversion to a shop.



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## Field Visit

- 8.6.13. The field visit took place on 22nd May 2025 in clear and dry conditions. Heritage assets recorded on the Highland Council HER were visited to assess their level of preservation.
- 8.6.14. The whole Application Boundary has previously been developed as part of the Limekiln Wind Farm and Limekiln Wind Farm extension development. The location for the proposed BESS facility is on land previously utilised for the construction compound to facilitate the construction of the wind farm. The surrounding landscape was predominantly forestry plantation with limited access to areas of open moorland.

## Archaeological and Historical Narrative

### Prehistoric Periods (c.8,000 – 400 CE)

- 8.6.15. Settlements within the Mesolithic period (c.8,000 – 4,000 BCE) were rarely permanent and varied greatly, from larger multi-activity locations to short-lived specialist sites which may only have been used for as little as a day or a matter of hours. Lithic scatters are the most visible sites, due to the durable nature of the artefacts. But all lithic scatters represent archaeology that has been disturbed, and few have been comprehensively investigated. They are often an indication of locations that have been used for millennia, as well as into later periods, so that detailed interpretation is difficult. Shell middens have received much attention, in part due to their preservation and visibility, but in fact they are relatively rare in the Scottish Mesolithic. They vary in size, and while most are coastal, they can occasionally be found inland. Many are in locations that show long periods of use, even into the Neolithic or Bronze Age.
- 8.6.16. The archaeological record for this area of Caithness is relatively rich with assets dating from the Prehistoric to the early Modern period present. The Neolithic to Bronze Age (4000 – 900 BCE) is represented by chambered tombs (SM444, SM471, SM476, SM489, SM498 and SM500), funerary cairns (SM437, SM458, SM470 and SM5406), standing stones (SM428, SM478, SM441 and SM421) and stone circles (SM427). Also possibly dating to the Bronze Age are an asset type – stone rows – unique to Caithness and the east of Sutherland. The site type is composed of multiple rows of small, upright stones commonly radiating in a fan shape from a cairn (SM2386). There is also a scheduled example of a stone setting (SM426).
- 8.6.17. Assets of broadly Prehistoric date recorded within the Study Area include the scheduled monuments Clach Clais an Tuire standing stone (SM441), located 1.5 km to the east of the Application Boundary and Achvarasdal House, two stones N of (SM421), 2 km to the north-east of the Application Boundary. There are also 51 non-designated heritage assets of Prehistoric date within the Study Area. These comprise a mix of funerary and ritual features, such as cairns, standing stones and stone alignments, as well as settlement activity in the form of hut circles, burnt mounds, enclosures, field systems and cairnfields. Most of these assets have not been scientifically dated and may represent later Prehistoric settlement activity related to the Iron Age (900 BCE - 400 CE).

- 8.6.18. The Iron Age in Caithness is primarily represented by brochs (including SM492, SM513, SM514, SM562 and SM564). These structures are stone-built towers typically with a stairwell and intra-mural chambers built within the wall thickness. The exact function of brochs remains open to debate but the nature of these structures clearly suggests that defence was a priority. Caithness has the highest concentration of brochs in Scotland; these large dry-stone towers are commonly located on top of natural mounds. One broch is recorded within the Study Area: Achvarasdal House, broch 65m NE of (SM514), located 2 km north-east of the Application Boundary. Additionally, it is possible that at least some of the hut circles, enclosures and field systems in the study area date to this period.
- 8.6.19. Most of this Prehistoric activity is recorded across the more accessible fertile areas of land bounded between the higher moorland areas to the south and the coastline to the north. Whether this anomaly is a result of recording bias, based on the idea that the assets located across the more accessible areas of farmland were more likely to have been recorded, has not been fully explored. At face value, the spread of the known Prehistoric assets, covering both settlement and ritual activity, does seem to utilise the more accessible low-lying areas of the landscape. Based on the known spread of assets, it could be argued that it is this landscape area that is of more relevance in relation to the significance of assets in cases where the wider landscape contributes to the significance of the asset.

#### Historic Periods (400 CE – Present)

- 8.6.20. Dating to the early medieval period, Pictish inscribed stones such as SM616 and SM5299 located within wider area testify to Pictish cultural activity in the area in the last quarter of the first millennium AD (400 CE – 900 CE). There is limited evidence of settlement during this period, although it is possible that some of the Iron Age sites continued into the early historic period. There are no known sites of this date within the Study Area.
- 8.6.21. Dounreay Castle (SM6401) is a late medieval castle dating to the late 16th century. This castle was built in the style of the Lowland Scots castles rather than the more typical Highland style castle. As such this castle reflects the influence that the Lowland Scots exerted here at this time and is a symbol of the wealth of some of the larger estates of Caithness during the medieval period (900 CE – 1600 CE). The medieval period is also represented by Reay burial ground, old church and cross slab (SM615); the cross slab is believed to date to the 9th – 10th century.
- 8.6.22. Evidence for the Vikings in Caithness is largely concentrated along the coast. In the area just beyond the Study Area Viking burials were recovered in the early 20th century in the sand dunes at Reay. This set of burials is the largest concentration of Viking burials recorded on mainland Scotland.
- 8.6.23. From the Post-medieval period through to the early 19th century, the inland glens and straths of Caithness were populous with communities of farmsteads and townships farming the land. Outlying these settlements in more remote areas small shielings related to summer pastoral activity were commonly used. with farmstead, enclosures, dykes and sheepfolds represented within the Study Area.

8.6.24. The Sandside Estate clearances took place in the 1830s. This period saw the inland glens and straths cleared of their densely populated farming settlements with the population being moved out to the coast to make way for the adoption of large-scale sheep farming. These clearances left behind a legacy of abandoned remains of townships, farmsteads and shielings, many of which are marked on both Roy's Military map of the Highlands (1752-55) and the early OS (1877 and 1907). There are 53 non-designated heritage assets within the study area that represent the post-medieval settlement of the area.

8.6.25. Large scale sheep farming subsequently gave way to the creation of sporting estates and the development of extensive plantation forestry. To this day these remain the principal land-uses for the inner straths of Caithness, whilst the coastal fringe of this part of Caithness has been dominated by the Dounreay Nuclear Plant and the employment and infrastructure that this large industry has brought to the area.

OS name book

8.6.26. Additional information on several of the features noted is available in the OS name book compiled in this area between 1871 and 1873.

**Picts House at Big Keoltag:** *"Very little of this one remains, to be seen, as the greater part of it has been removed and nearly all the stones carried away, many years ago. None of my authorities can tell, whether anything was found in it or not. Situated on the Summet (sic) of Big Keoltag."*

8.6.27. Big Keoltag is within the study area to the north of the Application Boundary and includes HER MHG1615.

**Milton:** *"Is a small district having 6 or 7 small crofts in it situated between Borlum and Achvaresdale Cottage, none of the dwellings is in very good repair, the property of His grace the Duke of Portland."*

8.6.28. Milton now appears as a scatter of buildings forming a single farm with all the structures depicted still visible on the ground (MHG17820, MHG35639, MHG13499 and MHG37237).

**Creagan Well:** *"Is a fine spring well situated close to a small rocky hillock about 20 chains east of Borlum it is well known by this name in the district round about where it is the property of His grace the Duke of Portland."*

8.6.29. This well is situated just to the south west of two structures (part of MHG17820) noted as roofless on the map but these are not mentioned.

**Borag Knowe:** *"A small hillock well known by this name situated about ten chains North of Claperon. the property of His grace the Duke of Portland."*

8.6.30. This mound has a prominent Prehistoric enclosure (MHG39408) and hut circle which was clearly not noted at the time of making the map.

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**Aryleive:** *“This name applies to a piece of Green, Rough, pasture, part of which appears to have been, at one time, in cultivation. There is a lime Kiln at this place, in which lime is made for the land. The Stone is taken out of a quarry quite close to it. The property of the Duke of Portland.”*

8.6.31. This shows the kiln and quarry (MHG 22039) were in use in the late 1800’s as well as highlighting that at least some of the area around may have been cultivated.

8.6.32. Other records are all of natural features.

#### Statistical Accounts

8.6.33. The statistical accounts for the parish of Reay in Caithness and Sutherland were consulted for reference to relevant features.

8.6.34. The old account was written by David Mackay (1793). Although Sandside bay is mentioned several times along with the quarrying of limestone, nothing relevant to the site is mentioned and the only antiquity or archaeological monument mentioned is Knock Urray (MHG2517).

8.6.35. The new account was written by Finlay Cook (1845). This also mentions Knock Urray along with some stone built remains apparently exposed during a flood between Reay and the shore. It seems some pottery was also found with these structures but that they were robbed out for the good quality stone. A mineral spring is mentioned close to Helshetter (MHG25104), whose waters are compared to the spa at Strathpeffer. This well is most likely the ‘White Well’ noted on modern mapping at NC 96614 62805. Several limestone quarries are mentioned although these appear to be well to the north of the Application Boundary. There is also a section in the new account on antiquities that mentions chapels, brochs and a fort in the area.

#### **Disturbance**

8.6.36. The proposed BESS development area and the access tracks are within land areas previously disturbed and utilised during the construction of Limekiln Wind Farm and the Limekiln Wind Farm Extension. In particular the location of the proposed BESS is within an area that had formerly been the location of a large temporary compound. The site visit confirmed that the proposed area of the BESS was covered in a rubble stone surface. The construction of this large compound area will have truncated any known or potential archaeological remains.

8.6.37. Prior to the construction of the wind farm the Application Boundary had been part of the commercial plantation. The likelihood is that this would also have disturbed and likely removed any potential archaeology in the areas of plantation.

8.6.38. Based on the past disturbance of the area there is assessed a nil potential for previously unknown remains of any period to be encountered within the Application Boundary.

## **8.7. Statement of Significance and Importance**

### **Known and potential heritage assets within the Application Boundary**

#### **Known historic assets within the Application Boundary**

- 8.7.1. There are no known designated or non-designated heritage assets within the Application Boundary.
- 8.7.2. As stated above (Section 5.7), the proposed BESS will be located across an area that had previously been in use as a temporary compound during the construction of Limekilns Wind Farm and Limekilns Wind Farm Extension. The associated Substation Extension will occupy land adjacent to the existing wind farm Substation and access will utilise existing wind farm tracks. The underground cabling will run along the Core Path and will have a minimal negative impact on the ground.
- 8.7.3. The previous disturbance of these areas has resulted in there being a nil potential for archaeological remains as a result of the construction of the proposed BESS, associated substation extension and ancillary works.

### **Setting of Heritage Assets**

#### **Screening**

- 8.7.4. The gazetteer in Appendix 8.1 presents the results of a screening exercise to identify baseline heritage assets with the potential for adverse impacts as a result of the proposed development within their setting. The Zone of Theoretical Visibility within the Landscape and Visual Report presents the results of the ZTV in relation to SM441 Clach Clais an Tuire standing stone. A specific photomontage within the Landscape and Visual Report presents the results of visualisations in relation to SM441 Clach Clais an Tuire standing stone.
- 8.7.5. Consideration of significance, and the contribution of setting to significance (such as significant sightlines and vistas, notable open spaces, and prominent landmarks), is presented for heritage assets within the Study Area.
- 8.7.6. Only assets where it was assessed that the wider landscape contributed to significance have been considered for further detailed assessment in this report. The assessment of these assets has considered whether it is likely that their cultural significance could be harmed through development within its setting.

### **Assessment of Significance and Contribution made by Setting**

#### **Designated Heritage Assets**

- 8.7.7. All three designated heritage assets within the Study Area had the potential to be subject to impact through change in their settings from the proposed development.

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SM441 Clach Clais an Tuire standing stone

- 8.7.8. As a monument type, standing stones are poorly understood but the Scottish Archaeological Research Framework identifies them along with stone circles, stone rows and burial cairns as monuments that provide information about the nature of belief systems and associated ritual activity. It is suggested that many of these monuments have astronomical orientations, although for single standing stones this is somewhat difficult to attribute. Of importance is that these monuments were probably meant to be visible within the wider landscape. Clach Clais an Tuire standing stone (SM441) is a quadrangular stone standing to a height 1.9 m above ground, 0.6 m to 1.0 m broad, and 0.6 m thick and aligned on an E-W. axis.
- 8.7.9. The scheduled monument Clach Clais an Tuire standing stone is of high (National) importance.
- 8.7.10. The primary value of standing stones is the intrinsic archaeological interest. It holds archaeological significance as an asset that could provide evidence of the community that first erected the monument. Its likely association with other monument types is also a significant factor in its significance. Its contextual value therefore comes from its relationship with the surrounding landscape. The surrounding landscape therefore contributes to the significance of the standing stone. Clach Clais an Tuire standing stone is situated close to the east bank of the Achvarasdal Burn as it turns to the south before heading to a narrow pass between the hills of Creag Bheag (114 m AOD) and Creag Mor (142 m AOD). The standing stone's location also roughly marks the extent of the low-lying farmland which extends towards the coastline to the north.
- 8.7.11. Clach Clais an Tuire standing stones' alignment or setting within the landscape is not obvious although two factors have been considered. Firstly, the monument's potential association with other known Prehistoric assets within the wider landscape. The spread of known Prehistoric assets within the Study Area show that, except for one hut circle, none are located further south than the standing stone itself. These assets, which include evidence of both ritual and settlement activity, are spread across the low-lying accessible land along the coastal zone. These assets include two other known standing stones, both of which are closer to the coastline: Achvarasdal two standing stones (SM421), located within the grounds of Achvarasdal House, and the standing stone at Reay (MHG736), although this is possibly the remains of a stone circle. Therefore, it is considered that it is these views, across the low-lying fertile landscape, towards the coastline, that are intrinsic in understanding, appreciating and experiencing the monument.







*Illus 1. View to Clach Clais an Tuire standing stone (SM441) from Creag Bheag, facing north-east*

- 8.7.12. The second factor is the position of the standing stone at the turn of the Achvarasdal Burn, which on reaching the stone from the north east runs south between Creag Bheag and Creag Mor. The standing stone is certainly visible from the tops of both these hills (Illus 1) and the lower ground between them. Both these hills are also very prominent in the landscape (Illus 2). It could therefore be interpreted that views from the monument south-west in the direction of the hills holds some meaning to the monument and as such contributes to the significance of the standing stone. In this context it is considered that it is the two hills in this direction, being the most prominent features in the landscape, that provide the primary elements of the landscape that contribute to the significance of the stone and not the landscape between or beyond them.
- 8.7.13. A bare earth ZTV of the proposed development and a photomontage from the standing stone (see Landscape and Visual Report) both confirm that the proposed BESS and associated substation extension are screened in views from the standing stone towards the Application Boundary by the intervening topography. Therefore, no impact to the asset's significance is anticipated from the proposed development.



*Illus 2. View to Clach Clais an Tuire standing stone (SM441) looking towards Creag Bheag, Creag Mor (screened by the forestry).*

#### SM421 Achvarasdal two standing stones

- 8.7.14. Achvarasdal two standing stones (SM421) comprises two monoliths, which had evidently been standing stones at one time, which lie fallen within the garden at Achvarasdal Lodge. They are located c.2 km north-east of the Application Boundary on low lying ground close to Sandside Bay.
- 8.7.15. As a scheduled monument Achvarasdal standing stones are of high (National) importance.
- 8.7.16. The primary value of standing stones is their intrinsic archaeological interest. They hold archaeological significance as assets that could provide evidence of the community that first erected the monuments. Their likely association with other monument types is also a significant factor in its significance. Its contextual value therefore comes from its relationship with the surrounding landscape. Therefore, the surrounding landscape contributes to the significance of the stones as it provides context to the areas being settled by these communities. This landscape comprises the surrounding low-lying fertile land which would have been suitable for settlement and farming. The moorland to the south-west on which the Application Boundary is located is not part of this landscape and does not contribute to the significance of the stones. The stones are also screened from the Application Boundary by both mature woodlands surrounding the house and the local topography to the south.



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Therefore, no impact to the asset's significance is anticipated from the proposed development.

SM514 Achvarasdal House broch

- 8.7.17. Brochs were Iron Age fortified structures that date from approximately 600BCE to 400CE and comprised a squat tower with a small, single and easily defensible entrance. Some of the better-preserved examples contain evidence for a suspended floor, and most were constructed with an inner and outer wall tied together with wide stones, thereby forming galleries or passageways within the structure. It is thought that their appearance was linked to an expansion in slaving activity around the periphery of the emerging Roman Empire. They occur throughout coastal highland Scotland, with outliers recorded further south and in Ireland. Achvarasdal House broch (SM514) is set on a large grassy mound, the interior wall standing 1.7m high. Measuring 10m across the internal diameter, it has a chamber in the north-east segment and an entrance 0.9m wide in the south-east, where the width of the broch wall can be seen as 4.1m.
- 8.7.18. As a scheduled monument Achvarasdal House broch is of high (National) importance.
- 8.7.19. The primary value of brochs is the intrinsic archaeological interest in their fabric as a potential data source on the architecture, defensive, domestic life and the social motives behind the construction of such massive structures during the Iron Age. The nature of these structures suggests that defence was a priority, although symbols of power and the avoidance of conflict is also a potentially significant factor. The contextual value of brochs therefore comes from their relationship with the surrounding landscape, as prominently visible monuments. Brochs are commonly situated on mounds with views over the surrounding area/along valleys. Brochs are also often located close to areas of cultivatable land suggesting that agriculture was also of importance to those that constructed them.
- 8.7.20. Achvarasdal House broch is located c.2 km north-east of the Application Boundary within the grounds of Achvarasdal House, positioned on low lying ground close to Sandside Bay. It is a well-preserved example of a broch located close to a number of potentially contemporary broch sites in the area. It displays key architectural details within its interior such as an entrance passage with door checks and blocked doorways to intramural features. There is high potential for the preservation of related structures and deposits in the largely undisturbed mound surrounding the broch.



*Illus 3. View to Achvarasdal House broch (SM514) with one of the Achvarasdal standing stones (SM421) in the foreground, Facing south.*

- 8.7.21. It is likely that the broch would have been placed to be intervisible with other contemporary brochs, with a view over its controlled/farmed hinterland. When the broch was newly built and at full height, it would have been a dominant feature in the landscape, although this is no longer the case. It is this immediately surrounding landscape that was likely the territory of those that built it and which contributes to the significance of the monument. The majority of this landscape has been altered such that the original landform is no longer discernible, restricting the ability to understand and appreciate where the broch's dominant influence may have been targeted, or where its farmed hinterland may have been situated.
- 8.7.22. The moorland to the south-west on which the Application Boundary is located is not part of the landscape that contributes to the significance of the broch. The broch is also screened by mature woodland surrounding the house (Illus 3) and by topography to the south with no views to Application Boundary. Therefore, no impact to the asset's significance is anticipated from the proposed development.

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### Non-designated Heritage Assets

- 8.7.23. Of the 113 non-designated heritage assets within the Study Area, 14 may be subject to impact through change in their settings. These comprise eight funerary cairns, five ritual monuments and one settlement asset.

#### Funerary Cairns

- 8.7.24. The primary value of the eight funerary cairns is the intrinsic archaeological interest in their fabric as a potential data source on the architecture, and ritual funerary practices carried out by the communities that erected the cairns. These funerary cairns are generally constructed to be visible from distance, sometimes placed on hilltops or areas of higher ground. Therefore, the surrounding landscape contributes to the significance of the monuments as it provides context to the areas being settled by these communities.
- 8.7.25. **MHG738 Borag Knowe cairn** is recorded as being a 'circle of stones' on the summit of Borag Knowe surviving as a low pile of rubble stones, much disturbed and containing the footings of a crude later structure. It is of low (Local) importance (Illus 4). It is located 350 m north of the existing Limekiln Farm Substation close to Borag Knowe. Currently views towards the existing Limekiln Farm substation are screened by forestry plantation although the landscape to the south-east of the monument contributes to the significance of the monument as this would have been the hinterland settled by the communities that erected the monument. However, views in this direction already includes infrastructure associated with the wind farm. Therefore, although it is possible in principle that the cultural significance could be adversely impacted through development within its setting, this has already taken place, and the adverse impact will not be increased through the development of a substation extension at the proposed location.





*Illus 4. View of Cairn MHG739 looking SE towards the substation*

- 8.7.26. **MHG1614 Creagan Liath Cairn** is located 1.5 km north-east of the Application Boundary within farmland at Creagan Liath on low lying ground close to the Achavellan Burn. It is recorded as a turf-covered cairn, 9 m in diameter and 0.4 m in general height. It is of low (Local) importance. It was likely constructed to be seen from the areas of settlement and may be contemporary with the known hut circles (MHG733) recorded nearby. The assessment identified that the asset is screened from views towards the Application Boundary by Creag Leathan and Creag Bheag. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.27. **MHG1615 – Big Keoltag Cairn** is a turf-covered, flat-topped cairn, reduced to 22 m in diameter and 0.8 m high. It is of low (Local) importance. The cairn is located on a low rise at Little Keoltag close to the Burn of Isauld. The landscape that contributes to significance is the surrounding low-lying fertile land towards the coastline. The assessment identified that the asset is screened from views towards the Application Boundary by Borlum Rock and Little Rock. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.28. **MHG25075 Blarmore Cairn** comprises two isolated cairns, mostly heather covered, but with some stone exposed. The asset is of low (Local) importance. The cairns are located 1.8 km north-east of the Application Boundary within an area of low-lying ground overlooking the Achavellan Burn. The assessment identified that the assets are screened from views towards



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the Application Boundary by Creag Leathan. Therefore, no impact to the asset's significance is anticipated from the proposed development.

- 8.7.29. **MHG718 Torran Dubh possible burial or clearance cairn** comprises a mound which could be the remains of a burial cairn or clearance cairn. It is of low (Local) importance. The cairn is located on a small mound 1.8 km north of the Application Boundary overlooking the Burn of Isauld to the north-east. The landscape that contributes to its significance is the surrounding low-lying fertile land close to the coast. The assessment identified that the asset is screened from views towards the Application Boundary by the hills to the south. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.30. **MHG729 Creag Liath Cairn** measures 11 m in diameter and stands over 1 m in height. It is of low (Local) importance. The cairn is situated on a north facing slope 1.5 km north-east of the Application Boundary. There are no views towards the Application Boundary from the asset. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.31. **MHG730 Creag Liath Cairn** possible burial or clearance cairn is a heather-covered mound that may be a burial cairn or clearance cairn. It is of low (Local) importance. The cairn is situated on a north facing slope 1.5 km north-east of the Application Boundary. There are no views towards the Application Boundary from the assets. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.32. **MHG742 Little Rock Kerb Cairn** comprises a small cairn 6 m in diameter and 0.5 m high. On the south-west periphery a kerb about 0.2 m high is clearly visible. It is of low (Local) importance. The cairn is located 500 m north of the Application Boundary on the north facing slope of Little Rock. It is screened from views to Application Boundary by the intervening topography. Therefore, no impact to the asset's significance is anticipated from the proposed development.

#### Ritual Monuments

- 8.7.33. The primary value of the five ritual monuments is the intrinsic archaeological interest in their fabric as a potential data source on the architectural and ritual practices carried out by the communities that erected these monuments. These monuments are generally constructed to be visible from distance, sometimes placed on hilltops or areas of higher ground. Therefore, the surrounding landscape contributes to the significance of the monuments as it provides context to the areas being settled by the communities that erected the monuments and may inform on the ritual practices of the community.
- 8.7.34. **MHG24974 Achrasker Standing Stone** is located 1.8 km east of the Application Boundary on low lying ground and is currently within commercial forestry. The standing stone is of low (Local) importance. The landscape that contributes to its significance is the low-lying fertile land towards the north likely occupied by the communities that erected the stone. It is only 500 m north-east of SM441 Clach Clais an Tuire, standing stone and may be contemporary with that scheduled monument. It potentially includes views to the Application Boundary. However, at nearly 2 km from the Application Boundary the landscape that contributes to its significance does not include the moorland to the south and the proposed development would

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not affect the understanding, appreciation and experience of the monument. Therefore, no impact to the asset's significance is anticipated from the proposed development.

- 8.7.35. **MHG13450 – Little Rock stone alignment/cairn** is located 600 m north-east of the proposed substation extension at the base of Little Rock. It is of low (Local) importance. In this instance the lower slopes of Creag Leathan screen the asset from the Application Boundary. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.36. **MHG19408 Beul an Lochain a possible stone circle** is a setting of at least six irregularly shaped stones, showing through peat and heather. It is of low (Local) importance. The stone circle is located 2 km east of the Application Boundary although it was not found during a pre afforestation survey. It is supposedly on low lying ground close to Achavellan Burn. It is screened from Application Boundary by Creag Leathan and Creag Bheag. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.37. **MHG19431 Borlum Stone Row** comprises approximately 52 small stones sat in about 8 fan shaped rows that converge towards a small mound of stones at the narrow end of the fan and some 12.5 m distant. It is of low (Local) importance. The stone row is located 600 m north-east of the proposed substation extension at the base of Little Rock. The lower slopes of Creag Leathan screen the asset from the Application Boundary. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.38. **MHG60608 Reay Possible henge** identified on vertical APs dating to 1999-2001 and 2009. It is approximately 47 m diameter and appears to be formed from a ditch between 2 m and 3 m in width with the suggestion of an external bank. It is of low (Local) importance. The henge is located 600 m north of the Application Boundary across low lying fertile land. It is screened from the Application Boundary by Borlum Rock. Therefore, no impact to the asset's significance is anticipated from the proposed development.

#### Settlement

- 8.7.39. **MHG710 Creag Leathan Broch/homestead** comprises the mutilated remains of a feature that has been variously described as a cairn, broch and homestead. Its most likely interpretation is probably a Broch. It is of low (Local) importance. The asset is located on the north facing slope of Creag Leathan overlooking the low-lying fertile land to the north. It has no views towards the Application Boundary. Therefore, no impact to the asset's significance is anticipated from the proposed development.
- 8.7.40. The remaining non-designated heritage assets within the study area are considered to either not derive significance from setting that includes the surrounding landscape, or the landscape that does contribute to setting does not including the moorland landscape within the Application Boundary. These include findspots and cropmark sites that have no surface evidence or settlement evidence such as hut circles and townships where only the immediate surrounding landscape contributes to setting.
- 8.7.41. The archaeological, architectural and/or historic significance of each heritage asset would be fully preserved and appreciated should the development take place.
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## 8.8. Proposed Development

- 8.8.1. The final design details of the Proposed Development are still under development and the description provided below is indicative.
- 8.8.2. The Proposed Development will consist of lithium-ion battery energy storage units, Substation Extension and associated electrical equipment, a temporary construction compound, and all ancillary infrastructure (access, drainage, grid connection). An Indicative Development Layout plan is shown in Figures 'Site Plan' and 'Site Plan Detail'.
- 8.8.3. The BESS equipment would be sited in a site compound with appropriate surface water drainage and enclosed by security fencing. Operational access is proposed via existing access points and tracks used to serve the Limekiln and Limekiln Extension Wind Farm.
- 8.8.4. During operation, the site would be unmanned and operated remotely. Minimal on-site activities are required once operational other than infrequent maintenance activities.
- 8.8.5. The Proposed Development would likely comprise the key components as listed in Chapter 1 – Introduction.
- 8.8.6. BESS technology is a rapidly evolving area, and it is likely that changes will occur prior to consent, and then again prior to construction in light of the timescales involved. Notwithstanding that, the solution proposed will represent maximum case and will reflect best knowledge and practice at the time of submission.

## 8.9. Predicted Impacts of the Proposed Development

### Physical Impacts

#### Known & Potential Archaeological Remains

- 8.9.1. The assessment presented in this report has considered the evidence for the known archaeological and heritage resource within and surrounding the Application Boundary in order to establish the potential constraints and implications for construction of the BESS facility and Substation Extension.
- 8.9.2. Direct impacts upon known or previously unknown buried archaeological remains have the potential to occur during development as a result of intrusive groundworks causing truncation, fragmentation or complete removal. As set out in Section 7 above, the proposed BESS facility is proposed to be constructed across an area of land that had previously been used as the temporary construction compound during the development of the Limekiln Wind Farm and the Limekiln Wind Farm Extension. Access to the proposed BESS and Substation Extension will also utilise existing access tracks. Therefore, this assessment identifies that no known or unknown heritage assets are likely to be physically affected by the Proposed Development.

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## Setting Effects

- 8.9.3. Impacts upon the setting of heritage assets in the area surrounding the Application Boundary may occur during the construction and operation of the development as a result of visual or other sensory changes (such as noise, light and movement) within their settings, such that our ability to appreciate the significance of the asset is adversely (or beneficially) affected.
- 8.9.4. Beyond the Application Boundary there is one non-designated heritage assets which may be subject to impact through change in its settings.

### Designated Heritage Assets

- 8.9.5. None of the three designated heritage assets in the Study Area are considered to derive significance from setting that includes the proposed development site. The archaeological, architectural and/or historic significance of each non-designated heritage asset would be fully preserved and appreciated should the proposed development be constructed.

### Non-designated Heritage Assets

- 8.9.6. It was considered that the setting of Borag Knowe cairn (MHG738) would be adversely affected by the proposed development. The site of the existing Limekiln Wind Farm substation is located within the wider landscape that contributes to the setting of the asset. The assessment of the asset identified that the cairn would include views towards the Substation Extension, although most of the surrounding area had already been altered by forestry plantation plus the construction of the wind farm. It is therefore assessed that the construction of the BESS and in particular the Substation Extension would not add significantly to the extant infrastructure in the location of the proposed substation extension. Therefore, as a heritage asset of low (Local) importance, this adverse effect is unlikely to be of such magnitude to warrant a refusal of consent for the proposed development and it is assessed that the current understanding, appreciation and experience of the asset would remain unchanged.
- 8.9.7. The wider landscape contributes to the setting of a further 13 non-designated heritage assets. In all cases the assets are either screened from views towards the Application Boundary by topographical features or the wider landscape that contributes to each assets significance does not include the landscape within the Application Boundary. In each case the understanding, appreciation and experience of the assets would remain.
- 8.9.8. None of the remaining non-designated heritage assets in the Study Area are considered to derive significance from setting. The archaeological, architectural and/or historic significance of each non-designated heritage asset would be fully preserved and appreciated should the proposed development be constructed.

### Historic Landscape

8.9.9. Historic Landscape Assessment of the study defined land within the Application Boundary as: Plantation comprising densely planted, single age, coniferous species. No past use of the area was given and the whole Application Boundary would have been open moorland.

8.9.10. The development proposal is for a BESS, Substation Extension and associated infrastructure. located alongside an existing wind farm. The proposed development fits into this altered landscape grain located within both the envelope of the forestry plantation and the wind farm.

## 8.10. Discussion of Heritage Risk

### Evaluation Investigations

8.10.1. Archaeological evaluation investigations typically take the form of field walking for artefact recovery from plough soils, geophysical survey to identify anomalies which may be buried archaeological features, advance intrusive testing through trial trenching, or watching brief during construction.

### Archaeological Potential

8.10.2. Based on the assessment of no buried archaeological remains being present within the Application Boundary due to previous construction disturbance, the risk to known and unknown archaeological assets would not represent a likely constraint on development consent.

8.10.3. In light of the specific circumstances of this site and the assessment of potential development impacts described in Section 8, it is considered no further assessment of the archaeological potential would be required.

### Mitigation Measures

8.10.4. No additional action is likely to be required of the developer by the planning process. The likely development impacts are considered to be of a level of significance that no further archaeological investigations would be required. This recommendation would need to be confirmed in agreement with the Local Planning Authority.

## 8.11. Conclusions

### Policy Tests

8.11.1. This desk-based assessment has considered the likely impact that future development would have on potential below-ground archaeological remains within the Application Boundary, and the setting of heritage assets within the Study Area, in accordance with planning policy and guidance.

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#### **NPF4**

- 8.11.2. In the terms NPF4 Policy 7.h the understanding, appreciation and experience of the scheduled monuments would be adequately retained such that the integrity of setting would not be significantly adversely affected. In all cases it would remain possible to understand, appreciate and experience factors of their setting that contribute to its cultural significance.

#### **Local Development Plan**

- 8.11.3. In the terms of LDP Policy 57 the proposed development has been assessed, taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting.
- 8.11.4. Point 1 of the policy states 'for features of local/regional importance we will allow developments if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource'. The currently proposed BESS location does not impact upon any known heritage assets within the 2 km study area. The location of the Substation Extension is assessed as having an adverse impact on the setting of MHG738 Borag Knowe cairn. However, the construction of the Substation Extension would not add a significant change to the existing extant infrastructure in this location. As a heritage asset of low (Local) importance, this adverse effect is unlikely to be of such magnitude to warrant a refusal of consent for the Proposed Development.
- 8.11.5. There are no known heritage assets within the Application Boundary, and it is anticipated that the development proposals will accord with the Local Policy requirements.
- 8.11.6. Point 2 states 'For features of national importance we will allow developments that can be shown not to compromise the natural environment, amenity and heritage resource'. None of the assets of National importance will be compromised by the proposed BESS facility.

### **8.12. Conclusions**

- 8.12.1. It is intended that this report contains sufficient objective data to enable an informed and reasonable decision to be made regarding the potential heritage constraints to the Proposed Development and whether further investigation and mitigation is required.
- 8.12.2. The DBA identified no designated heritage assets within the site boundary and three in the wider Study Area.
- 8.12.3. The assessment identified no non-designated heritage assets in the Application Boundary and 113 in the wider Study Area.
- 8.12.4. There is considered to a nil potential for the presence of previously unknown archaeological remains from any periods.



- 8.12.5. It is not anticipated that proposals to develop the site should represent a conflict with legislation or national or local planning policies relating to the historic environment. The likely development impacts are not considered sufficiently significant to warrant refusal of a planning application to develop the site.

#### **Potential Direct Impacts**

- 8.12.6. The assessment has found that the archaeological potential of the Application Boundary is Nil due to the previous use of the site.
- 8.12.7. The BESS will not impact directly on any designated or non-designated historic assets as there are none within the application boundary.

#### **Potential Setting Effects**

- 8.12.8. The Stage 1 assessment has found that the significance of the three scheduled monuments within the Study Area would not be affected as a result of direct impacts and through visual changes within their setting resulting from the proposed BESS and Substation Extension. There may be an adverse effect (through changes within its setting) on the significance of up to one non-designated assets (MHG738 Borag Knowe cairn). However, the construction of the Substation Extension would not add a significant change to the existing extant infrastructure in this location and this adverse effect is unlikely to be of such magnitude to warrant a refusal of consent for the Proposed Development.

### **References**

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#### **Historic maps**

1st edition OS 25" map surveyed 1872 showing Limekiln and two buildings. Caithness X.14 (Reay)