

HERITAGE IMPACT ASSESSMENT

Cato Data Centre

Applicant: ILI Cato Ltd.

Version 1.0

EXPERTISE | KNOWLEDGE | SUPPORT

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Document Abbreviations

Abbreviation	
HES	Historic Environment Scotland
HIA	Heritage Impact Assessment
FC	Fife Council
FCAU	Fife Council Archaeological Unit
AOD	Above Ordnance Datum
EIA	Environmental Impact Assessment
NGL	Natural Gas Liquids
BESS	Battery Energy Storage System
NLS	National Library of Scotland
HER	Historic Environment Record
NRHE	National Record of the Historic Environment
NPF4	National Planning Framework 4
HEPS	Historic Environment Policy for Scotland
HLA	Historic Land-Use Assessment
LPA	Local Planning Authority
WSI	Written Scheme of Investigation
ZTV	Zone of Theoretical Visibility

Document Attachments

Document Title	Description
Appendix 2.1	Heritage Site Evaluation
Appendix 6.1	Designated Assets: Impact Assessment
Appendix 6.2	Non-Designated Assets: Impact Assessment

1. EXECUTIVE SUMMARY

This Heritage Impact Assessment (HIA) has been prepared to accompany a Planning Application for the proposed Cato Data Centre development on land to the north of Auchtertool, Mossmorran, Fife, KY2 5XW, on behalf of ILLI Cato Ltd.

Baseline assessment identifies a limited number of designated heritage assets with potential to experience effects, including Listed Buildings and a Garden and Designed Landscape, as well as a small number of non-designated Historic Environment Record assets. The assessment has been informed by desk-based research, site inspection, and a generated Zone of Theoretical Visibility.

Impacts to designated heritage assets are limited to the introduction of new built form within their wider setting and result in a Significance of Effect ranging from Negligible to Minor, remaining below the threshold of unacceptable harm. Impacts to non-designated heritage assets include the total loss of two HERs and partial loss of a third, with effects assessed as Minor to Moderate. Mitigation is proposed to address these losses through archaeological recording, in line with advice from Fife Council Archaeological Unit, NPF4, Policy 14 of FIFEplan, and guidance contained within PAN 2/2011.

Overall, the assessment concludes that the proposed development would not result in a significant adverse effect on the significance of designated heritage assets, or their settings, and that impacts to non-designated assets can be appropriately mitigated in line with policy and guidance.

2. INTRODUCTION

2.1. Scope of Assessment

Cogeo Planning & Environmental Services Ltd was commissioned by LoganPM Ltd., on behalf of ILL Cato Ltd., to compile a Heritage Impact Assessment (HIA), supported by an initial site evaluation and walkover survey, for the installation of a data centre, located on land to the north of Auchtertool, Mossmorran, Fife, KY2 5XW. The project is referred to as Cato Data Centre. Comprising a campus of different data hall buildings, the development will also introduce internal access roads, parking, security fencing, ponds, paths, landscaping, new woodland, wildflower meadow, and other ancillary development.

2.2. Aims and Objectives

The historic environment is defined as “*the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand*”¹. The importance of protecting this historic environment is widely recognised; however, protection is not intended to prevent development but rather ensure that any change is positively and appropriately managed. This relies on an understanding of the value and significance of the heritage assets likely to be affected.

This HIA aims to identify and appraise cultural heritage assets within a defined radius of the proposed development, assess their significance, and consider the potential impacts arising from the siting and design of the development. Where appropriate, measures to mitigate and/or offset the impact of the proposed development will be recommended.

2.3. Site Evaluation

An initial heritage evaluation of the site was undertaken by Cogeo in July 2025, including a desk-based review and site walkover. Conducted to inform the early design and layout considerations for the proposed development, the Heritage Site Evaluation report is provided as Appendix 2.1.

The purpose of this HIA is not to replicate the previous evaluation but to build upon it by providing a more detailed, policy-aligned assessment of potential heritage impacts.

2.4. Planning History

An Environmental Impact Assessment (EIA) Screening Opinion was submitted by LoganPM Ltd. and validated by Fife Council (FC) on 10th November (Application Ref: 25/03079/SCR). At the time of writing this report, the Screening Opinion had not yet been determined. This current application is for Planning Permission in Principle.

2.5. Area of Development

The proposed development covers approximately 72ha of predominantly agricultural land within FC’s boundary. Figure 2.1 illustrates the area of evaluation and its wider location context. This Figure also displays the two indicative areas of development, being: Development Area 1 located at the north of the site, representing proposed structures to a maximum height of 35m; and Development Area 2 at the south of the site, signifying development to a maximum height of 12m.

¹ National Planning Framework 4 – Glossary of definitions: <https://www.gov.scot/publications/national-planning-framework-4/>

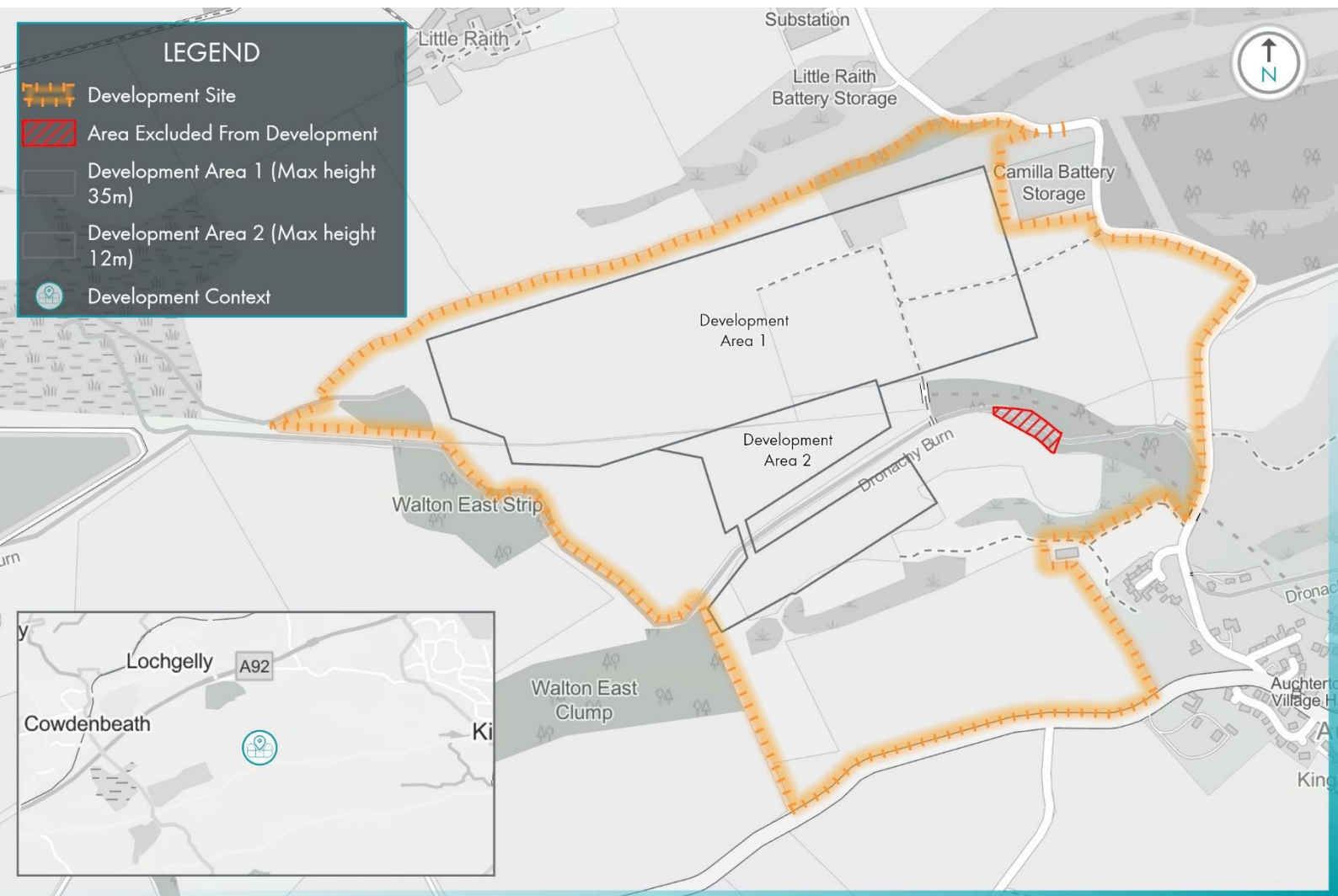


Figure 2.1 Area of Development and Context

2.6. Site Selection and Need for Development

The site was identified through a nationwide search for land with appropriate planning characteristics. It comprises available land allocated for industrial use and is not subject to conflicting planning or environmental designations. The location in Scotland offers operational advantages, including access to lower carbon energy generation and improved energy efficiency compared to many other UK locations. These advantages stem from a favourable climate, with lower ambient air temperatures, providing greater opportunities for 'free cooling' and reduced annual energy demand. Existing infrastructure supports the suitability of the site, including nearby electricity substations, available data connectivity, and established road access.

The proposed development represents modern digital infrastructure that supports Scotland's digital economy. Underlying drivers for such infrastructure include:

- Growth in demand for secure, resilient data storage associated with business activity, public-sector digitalisation, artificial intelligence systems, and cloud computing.
- The high-level availability of excess energy in Scotland, notably from offshore and onshore wind generation, which data centres and similar developments can take advantage of.

- National and regional economic strategies that seek to support digital innovation, inward investment, and the development of skilled employment.
- NPF4, which recognises the role of energy-efficient digital infrastructure in supporting the transition to net zero.
- The need to maintain and enhance the resilience and reliability of regional telecommunications networks.

2.7. Consultee Engagement

Ongoing engagement with FC Archaeological Unit (FCAU) has taken place throughout 2025, with details included in Appendix 2.1. The most up-to-date and detailed response was received on 22nd September 2025, from Stephen Liscoe, Professional Assistant, as follows:

"I have discussed the situation with colleagues and bearing in mind the cost of such a large open area excavation to archaeologically record Hallyards Castle (as would be required of such a site with possible 11thC origins) which would include the post-excavation and publication costs, then in line with our policy and best practice I would strongly advise that if at all viable your client designs a layout that incorporates the castle into an untouched greenspace within their development. This approach would be in the best interests of the archaeological asset, and very probably in your client's best financial interests.

The remains of the nearby stable block, or cottages, which are probably only 19thC, (and more than likely constructed of masonry robbed from the castle in 1847) are of a much lesser historical and archaeological significance, and could therefore simply be recorded and removed at a considerably lesser cost.

I would also encourage you to advise your client of the risk of undertaking a pre-application excavation and possibly not then securing planning consent. I would advise accepting excavation as a foregone condition of consent rather than engaging in a pre-application excavation. However, if your client wishes to excavate the site, then the process will be surprisingly straight forward given that it has no statutory protection, being neither Scheduled nor Listed.

For an excavation to be considered appropriate, as part of a subsequent planning application, I would strongly advise that you submit an archaeological Written Scheme of Investigations for our informal 'approval' as part of a pre-planning application. This should outline a robust 'preservation by record' methodology; which would involve standing building recording, 100% open area excavation and suitable post-excavation research and publication as mitigation for the complete loss of the building, all undertaken by appropriately qualified heritage professionals. I would be happy to advise on potential contractors if required.

If such a mutually acceptable excavation proposal was submitted as part of a planning application, then historic environment considerations could be scoped out of the application determination process and could possibly be agreed as part of an official pre-app response.

I feel that such an approach to the development of the site, with or without removal of the castle remains, would ease the process and potentially be of benefit to your client's development plans."

2.7.1. Summary of Consultee Advice

- If viable, incorporate castle remains into greenspace to avoid high costs of full excavation and post-excavation requirements.
- Recording and removal of the minor 19th Century stable block/cottages is more appropriate if needed, given their lower significance.

- Avoid pre-application excavation due to the risk of not securing planning consent.
- If full excavation is pursued, submission of a Written Scheme of Investigation (WSI) is advised, outlining a robust 'preservation by record' methodology, including standing building recording, 100% open area excavation of a defined area surrounding Camilla: Castle and Camilla: Building (specifics to be agreed via a WSI), and post-excavation research and publication by qualified professionals.

3. LEGISLATION, POLICY AND GUIDANCE FRAMEWORK

Heritage legislation, planning policy and guidance aims to protect, conserve, and, where appropriate, enhance the historic environment by providing a framework to guide development and to avoid, minimise or mitigate adverse impacts.

The statutory planning framework for the protection of heritage assets in Scotland is principally set out in the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997² and the Ancient Monuments and Archaeological Areas Act 1979³, as amended by the Historic Environment (Amendment) (Scotland) Act 2011⁴. These Acts establish the legal duties and consent regimes governing change affecting the historic environment.

The current national planning policy context is provided by National Planning Framework 4 (NPF4)⁵, which contains policies for the management of change affecting the historic environment. Equally, the principles set out in the Historic Environment Policy for Scotland (HEPS)⁶ provide the overarching strategic policy context for the historic environment. Planning Advice Note 2/2011: Planning and Archaeology⁷ provides supporting guidance for archaeological considerations. At a local level, the Fife Local Development Plan (FIFEplan⁸) sets out the long-term spatial strategy for development within the Council area. Of relevance is Policy 14: Built and Historic Environment, which establishes the criteria against which development proposals affecting heritage assets and their settings are assessed. Table 3.1 identifies best practice guidance also utilised in the preparation of this HIA.

Table 3.1 Heritage Best Practice Guidance

Document
Our Past, Our Future: The Strategy for Scotland's Historic Environment (2023) ⁹
Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC, CIfA) (2021) ¹⁰
Historic Environment Scotland: Managing Change in the Historic Environment Series ¹¹
Environmental Impact Assessment Handbook (HES) (SNH, now NatureScot) (2018) ¹²
Standard and Guidance for Historic Environment Desk-Based Assessment (CIA) (2014; updated 2017, 2020) ¹³
Technical Guidance Note 06/19: 'Visual Representation of Development Proposals' (Landscape Institute) (2019) ¹⁴
Fife Council: Making Fife's Places Supplementary Guidance ¹⁵

² Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997: <https://www.legislation.gov.uk/ukpga/1997/9/contents>

³ Ancient Monuments and Archaeological Areas Act 1979: <https://www.legislation.gov.uk/ukpga/1979/46>

⁴ Historic Environment (Amendment) (Scotland) Act 2011: <https://www.legislation.gov.uk/asp/2011/3/contents>

⁵ NPF4: <https://www.gov.scot/publications/national-planning-framework-4/>

⁶ HEPS: <https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>

⁷ PAN 2/2011: <https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>

⁸ FC FIFEplan: <https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/local-development-plan-FIFEplan>

⁹ HES Our Past, Our Future: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=79204155-9eb2-4d29-ab14-aff200ec2801>

¹⁰ Principles of Cultural HIA: https://www.archaeologists.net/sites/default/files/i30361_iema_principlesofchia_v8.pdf

¹¹ Managing Change in the Historic Environment Series: <https://www.historicenvironment.scot/archives-and-research/publications>

¹² EIA Handbook: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0>

¹³ Standard and Guidance: https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA_4.pdf

¹⁴ TGN 06/19: <https://www.landscapeinstitute.org/visualisation/>

¹⁵ FC Making Fife's Places SG: <https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/planning-guidance>

4. METHODOLOGY

The methodology used in this report has been prepared using the “Environmental Impact Assessment Handbook” (HES/NatureScot, 2018) and the HES ‘Managing Change in the Historic Environment’ series, and seeks to assess the likely impact on heritage assets using a four-step approach:

Step 1: Identify heritage assets that have the potential to be affected by the proposed development.

Step 2: Define the sensitivity/significance of each asset and/or its setting.

Step 3: Evaluate the possible impact of the proposal on the significance of assets and/or their setting.

Step 4: If required, assess options/suitability of mitigation to guarantee minimum harm.

4.1. Step 1: Identifying The Heritage Asset

The first stage of this assessment involves desk-based identification of heritage assets which could potentially be affected by the development. Sources consulted include, but are not limited to: Fife HER, Historic Environment Scotland (HES) data portal¹⁶, [trove.scot](https://www.trove.scot/)¹⁷, National Library of Scotland (NLS) mapping¹⁸, LiDAR data and Pastmap¹⁹. Potential impact to the setting of heritage assets is initially considered against the theoretical visibility of the development proposed. An excluded 2km Zone of Theoretical Visibility (ZTV) based on a Digital Terrain Model derived from Ordnance Survey Landform Panorama data (10m height contours drawn from a scale of 1:50,000) has been prepared using Resoft™ Windfarm software to highlight areas where the proposed development is theoretically visible. Information is limited by the detail of the digital terrain model data available for use. Generated for receptors at a height of 1.7m, visibility has been calculated to a maximum development height of 35m for Development Area 1 and 12m for Development Area 2, as per Figure 2.1.

This ZTV has been produced to account for both woodland and built structures within the local area to provide a more accurate representation of the likely impact and visibility of the proposed data centre. The barriers, as considered by the software, are absolute and cannot account for variance in the density of vegetation or the filtering of views. No individual trees, shrubs or other vegetation are accounted for within the modelling, nor man-made features of rail or road embankments.

It should be noted that ZTV maps do not consider the orientation of viewers and may indicate a theoretical view that is outside of the actual angle of view afforded. Calculations also do not allow for the deterioration of visibility over distance, light or weather. As such, ZTVs tend to overestimate the extent of the influence of a development on the surrounding landscape and visibility. While excluded ZTVs do not take account of the potential for felling, clearance, or seasonal change in vegetation, it is considered a useful tool to initially identify those assets with most potential for impact. The level of detail provided by an excluded ZTV is considered proportionate and no more than is necessary to understand the potential impact on the significance of assets.

4.2. Step 2: Defining The Sensitivity/Significance

All heritage assets have significance; however, some are judged to be of more value than others. This judgement is made by establishing the ability of the heritage assets to contribute to our understanding, appreciation and/or experience of

¹⁶ HES Data Portal: <https://portal.historicenvironment.scot/downloads>

¹⁷ HES trove.scot: <https://www.trove.scot/>

¹⁸ NLS: <https://maps.nls.uk/>

¹⁹ Pastmap: <https://pastmap.org.uk/>

the past²⁰. The sensitivity of designated heritage assets is generally established through their designation, while non-designated assets will be assessed based on professional judgement, with the aid of criteria as shown in Figure 4.1 Figure 4.1²¹.

Negligible	Low	Medium	High
Cultural heritage assets / sites whose importance cannot be determined with the information currently at hand. This can include sites where the extent of buried remains is unknown.	Assets valued at a local level, e.g.: Cat C Listed Buildings. Buildings of local significance / Locally listed assets. Designated / undesignated assets that meet the criteria as determined by the assessor.	Assets valued at a regional level, e.g.: Cat B Listed Buildings. Conservation Areas. Designated / undesignated assets that meet the criteria as determined by the assessor.	Assets valued at an international or national level, e.g.: World Heritage Sites. Scheduled Monuments. Cat A Listed Buildings. Gardens and Designed Landscapes. Inventoried Battlefields. Designated / undesignated assets that meet the criteria as determined by the assessor.

Figure 4.1 Scale of Sensitivity

4.3. Step 3: Evaluating The Potential Impact

An assessment of the potential magnitude of impact posed by the development on each heritage asset follows. Impacts are assessed to fall within four types, as detailed in Table 4.1, while Figure 4.2 discusses the magnitude of this change.

Table 4.1 Types of Impact

Type	Impact
Direct Physical Impact	Physical fabric of the asset is removed or damaged as a direct result of the development, e.g. removal of archaeological deposits as a result of excavation for foundations. Such impacts are generally a result of the construction phase and will be permanent.
Indirect Physical Impact	Fabric is lost or preserved as a result of the development even though the asset lies removed from the proposal, e.g. damage to walls as a result of vibration from piling. Such impacts occur at any stage of development and are likely to be permanent.
Setting Impact	Generally direct impacts to how the existing surroundings contribute to our ability to understand, appreciate and/or experience an asset, or how the asset contributes to its surroundings. Generally, but not exclusively, visual. May also relate to noise, odour, emission. Could change with seasonal variations. Such impacts occur at any stage of development and may be temporary, reversible or permanent.
Cumulative Impact	Relate to the physical fabric or setting of assets. Result of impact interactions, either of different impacts of the proposal itself or between the impacts of other projects.

²⁰ HES HEPS

²¹ Adapted from Environmental Impact Assessment Handbook (HES/NatureScot, 2018)

Criteria	Negligible	Low	Medium	High
Adverse	No perceptible change in setting. No / fully reversible physical impact.	Minor or barely perceptible change to the setting of an archaeological monument or building. Removal of a small part of a larger monument or site or a change to a building's feature that causes a minor alteration to the historic context or setting.	Partial alteration of the setting of an archaeological monument or building. Removal or physical alteration to part of a monument or extensive alteration of a building.	Severe alteration of the setting of a heritage asset or a fundamental changing in setting of a building. Complete destruction or removal of a designated site or structure.
Beneficial		Changes that result in elements of the asset's fabric or setting that detract from its cultural significance being removed.	Changes to key elements of the asset's fabric or setting that result in its cultural significance being preserved, where they would otherwise be lost, or restored.	Preservation of an asset in situ where it would be completely or almost completely lost in the do-nothing scenario.

Figure 4.2 Magnitude of Change

The sensitivity of each asset identified as potentially affected by the development is assessed against the magnitude of change, resulting in a significance of effect (Figure 4.3). Where the significance of effect includes more than one category of effect (Major/Moderate), professional experience and judgement are used to determine impact. The assessment of impact will depend on whether the potential effect would result in an impairment to the understanding, appreciation and/or experience of the heritage asset, or its setting, and therefore if its heritage significance would be reduced. Setting is not always an important contributor to the special interest of a heritage asset, and in these instances, changes within the wider environment will be unlikely to alter how the asset is perceived. Regardless, it should be noted that where significant effects are found, the established value of a heritage asset, or its setting, may not necessarily be adversely affected.

Cultural heritage impacts are seldom quantifiable, with the determination of Magnitude of Change required to be led transparently by experienced professional judgement. Through appreciating the sensitivity of an asset and considering this against the determined Magnitude of Change, a Significance of Effect can then be established.

In the HIA, those effects established as Major or Major/Moderate will be considered significant, as required by EIA Regulations. These are the effects that the assessor considers to be material in the decision-making process.

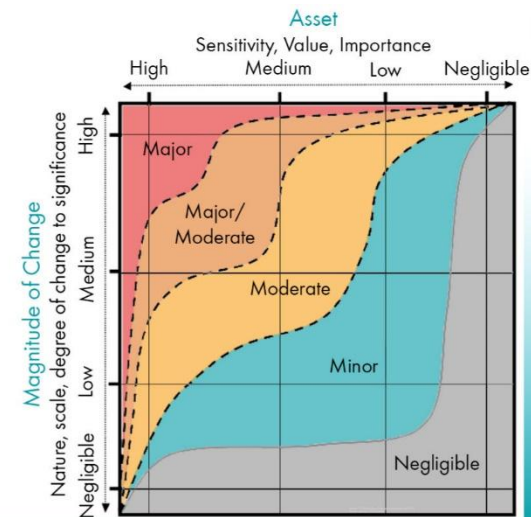


Figure 4.3 Significance of Effect

4.4. Step 4: Potential Mitigation/Enhancement

Where appropriate, options for mitigation and/or enhancement will be recommended, with the aim of ensuring minimal impact. These measures are only considered in response to specific needs and therefore may vary between heritage assets. Potential options for mitigation and/or enhancement are detailed in Table 4.2.

Table 4.2 Mitigation and Enhancement possibilities

	Potential measures
Mitigation	Appropriateness of initial site selection and sensitive early design influence. Screening of development via landscape proposals, such as tree/hedgerow planting or bunds.²² Offsetting negative impact by recording, disseminating and archiving important elements of affected heritage assets.
Enhancement	Removal or replacement of detrimental buildings or features. Restoring or better revealing a heritage feature or view. Facilitating improved public understanding, appreciation or experience of an asset, including setting.

²² Whilst screening can be considered a good mitigation option, it should not be used as a substitute for sensitive siting or design.

5. HERITAGE IDENTIFICATION

Located west of Auchtertool, the site lies within agricultural land characterised by gently undulating topography, rising from around 115m to approximately 133m Above Ordnance Datum (AOD). The surroundings comprise rolling fields, hedgerows, occasional woodland, and dispersed farm steadings with limited settlement apart from Auchtertool itself. Although the site is part of a rural working landscape, the wider setting contains notable energy-related infrastructure that introduces a more industrial character to the area. To the north and northwest, electricity pylons, substations, and existing Battery Energy Storage System (BESS) installations, including the adjacent Camilla BESS, Little Raith BESS, and Glenniston Substation, form established features. More distant elements, such as the Mossmorran Natural Gas Liquids (NGL) Plant and the Clentrie and Little Raith wind farms, create notable large-scale visual elements in the skyline. As a result, the overall setting of the site reflects a growing transition between traditional agricultural land use and established energy-infrastructure.

A 2km buffer, drawn from Development Areas 1 and 2 (Figure 2.1), represents the area where the proposal is expected to be most noticeable. Informed by the ZTV, this study area is intended to encompass heritage assets that may experience change within their setting. Beyond 2km, visibility is limited by landform, vegetation and built development, which together constrain long-range views. Any views beyond this distance are expected to be of low visual prominence, with no significant adverse effects on heritage assets anticipated.

5.1. Designated Heritage Assets

All designated heritage assets identified within the area of focus are illustrated in Figure 5.1. No World Heritage Sites, Scheduled Monuments, Inventoried Battlefields or Conservation Areas are present. Table 5.1 summarises the type and quantity of assets identified.

Table 5.1 Summary of Designated Heritage Assets to 2km

Designated Asset	Definition	Quantity
Listed Buildings (LBs)	Buildings, structures and/or objects legally protected for their special architectural or historic interest, to ensure changes do not harm their character or significance.	5 Cat B 10 Cat C
Gardens and Designed Landscapes (GDL)	Grounds consciously laid out for artistic effect.	1

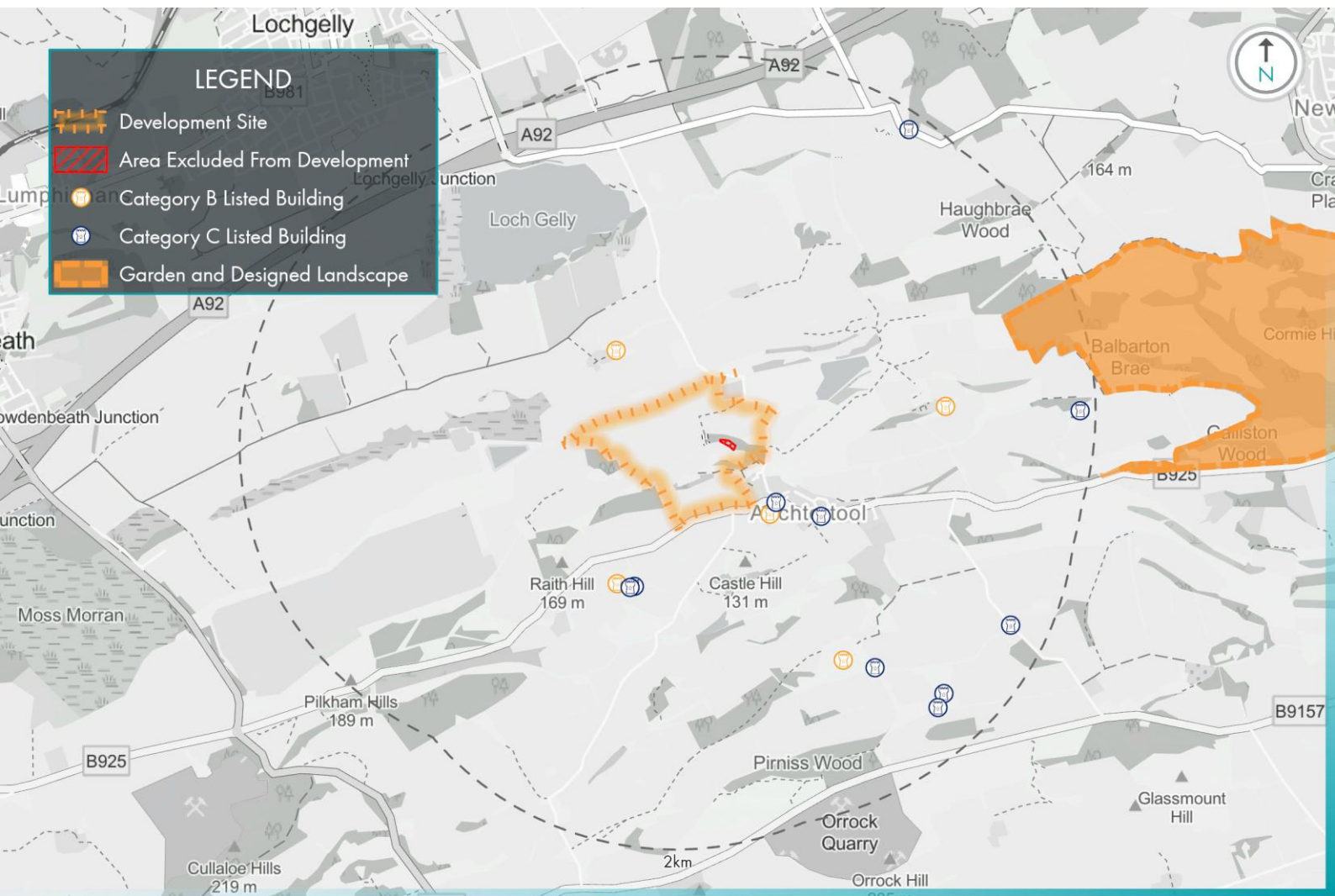


Figure 5.1 Designated Heritage Assets to 2km

5.2. Non-Designated Heritage Assets

The Historic Environment Record (HER) for Fife Council has been consulted, as sent by the FCAU (3rd April 2025). Advice equally noted that much of the record is duplicated on Canmore (now [trove.scot](https://www.trove.scot/)²³) and Pastmap. 92 HER points are located within the buffer of development, illustrating a history of human activity in the area. It should be noted that these Records hold no statutory protection. Figure 5.2 illustrates these assets in relation to the area of development.

²³ HES, trove.scot: <https://www.trove.scot/>

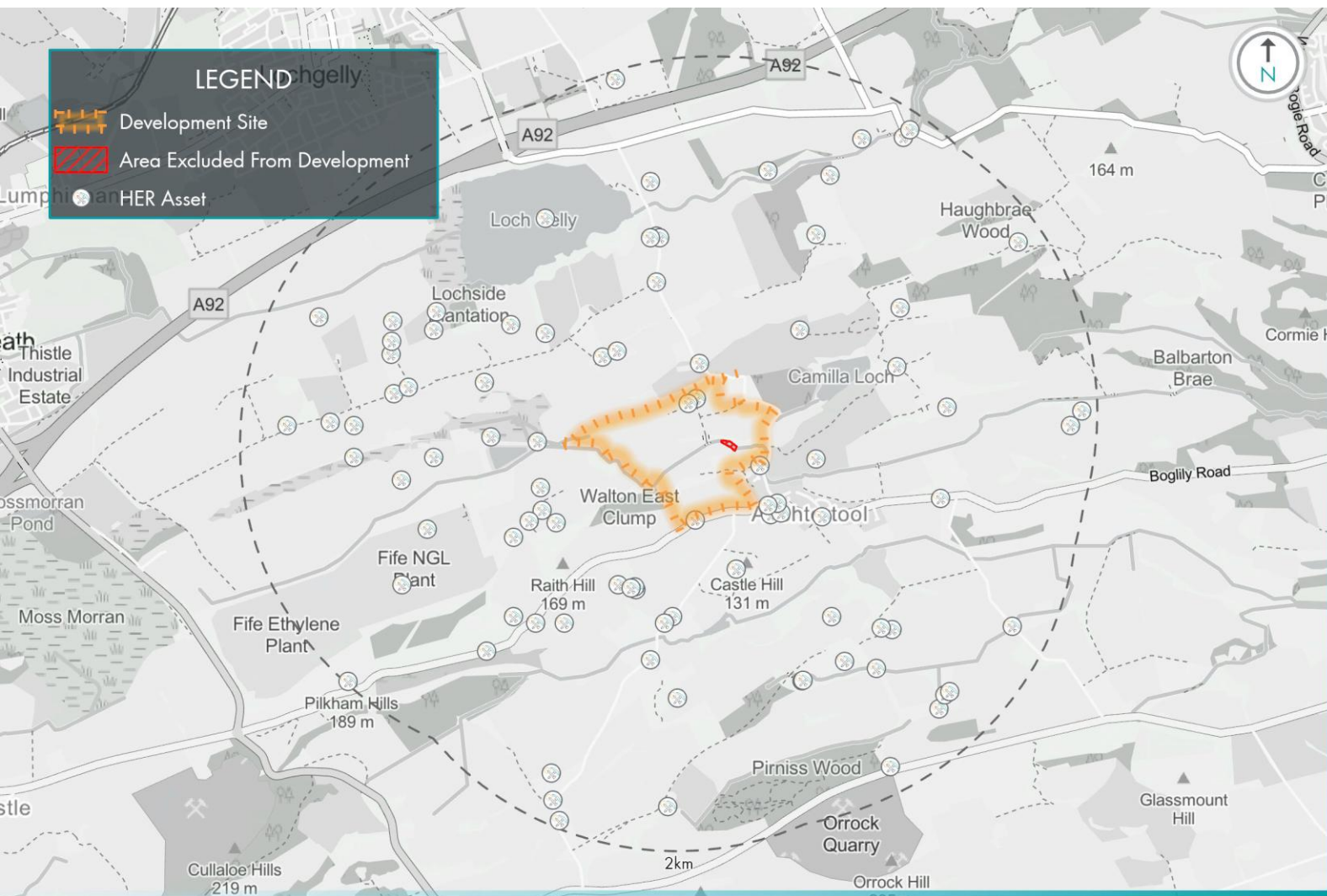


Figure 5.2 Non-Designated Heritage Assets to 2km

6. IMPACT ASSESSMENT

6.1. Designated Heritage Assets

Direct physical impacts are not anticipated, with no development occurring within or directly affecting the footprint of any designated heritage asset. Indirect physical impacts are also not expected, given the nature of the proposed development and the characteristics of assets. No further assessment is therefore required relating to physical impacts and designated assets. Figure 6.1 presents the excluded ZTV, illustrating areas from which at least part of the development may be visible.

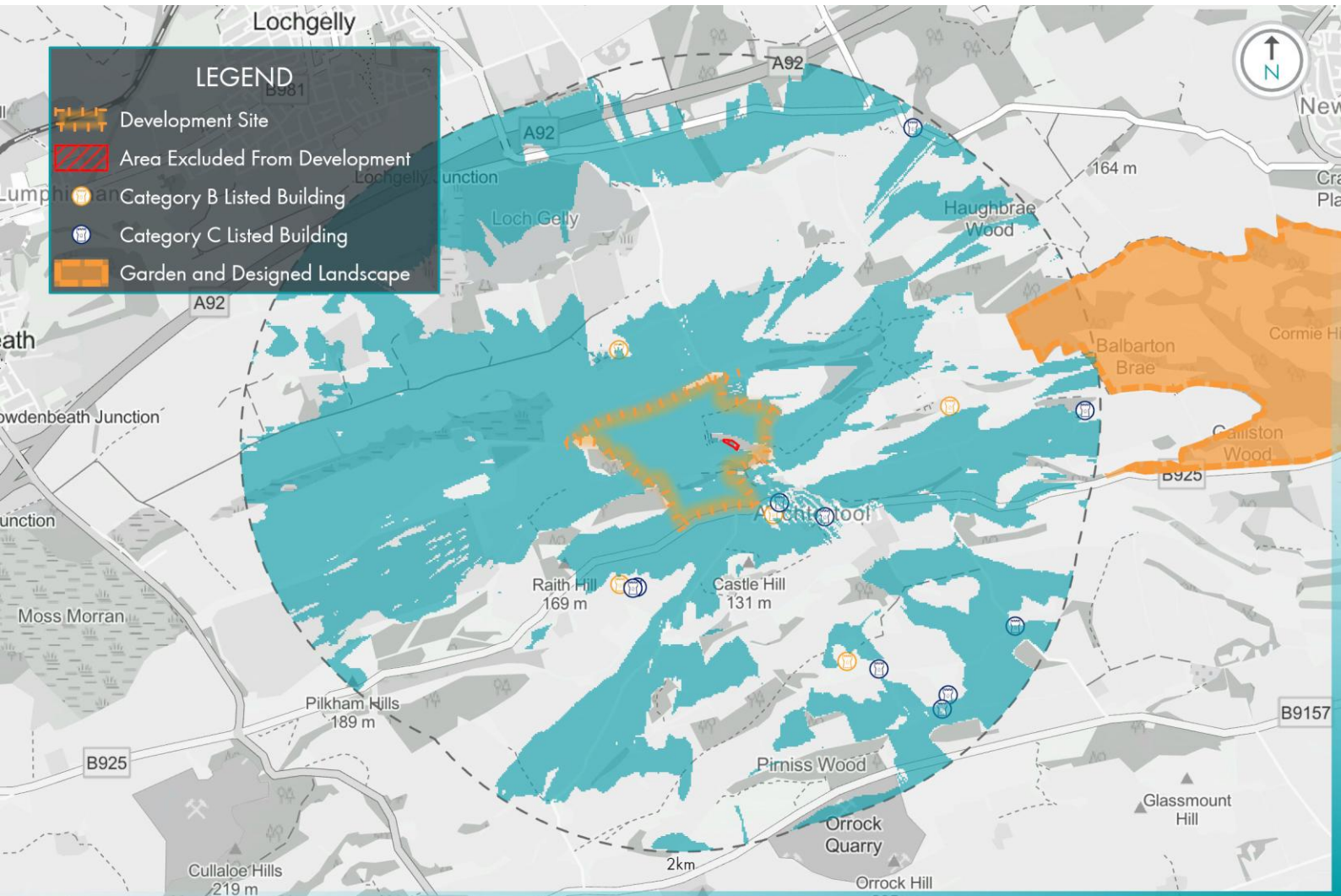


Figure 6.1 Designated Heritage Assets overlain with ZTV

Whilst the ZTV does not, in itself, define the setting of a heritage asset, it is a useful analytical tool for identifying areas where visual influence may arise and for guiding the focus of the assessment. Cumulative impacts are not anticipated, with no consideration required, as no other development of a similar typology is present within the area of focus. Accordingly, analysis focuses on five heritage assets considered to be at greatest risk of impact, as outlined in Appendix 6.1.

The following tables define heritage significance and evaluate the potential impact resulting from the proposal, in relation to each heritage asset identified at risk of impact in Appendix 6.1.

Table 6.1 Impact Assessment: 11 The Maltings LB

HES Ref.	List Entry Name	Scale of Sensitivity	Appendix 6.1 Ref.
LB3673 ²⁴	11 The Maltings, Auchtertool	Low	1
Significance: Dating from the later 19th Century, this Category C asset is a porter's lodge and office, constructed of red brick with yellow brick dressings and now converted to residential use. The building belonged to "<i>the now demolished Auchtertool Distillery which closed in 1927, with the maltings remaining in use until circa 1970</i>". The Auchtertool Distillery originated as a brewery founded in 1650 and was converted to a distillery in 1845. These uses contributed to the expansion of Auchtertool village as a significant local employer, including the construction of nearby tenement buildings to accommodate workers. As such, 11 The Maltings retains heritage value through its historical and functional associations with the distillery and its role in the social and economic development of the village.			
Impact Assessment: Positioned 0.12km to the southeast of the development boundary, this asset is located approximately 0.5km from the nearest area of construction. Its setting is primarily defined by its integration within the built fabric of Auchtertool village and its historic association with the former distillery complex. Whilst the ZTV indicates that limited views of the development beyond the village may be possible, these would be distant, partial, and filtered by intervening built form and vegetation. Such views would not alter the key elements that contribute to the building's significance, nor would they affect how the LB is understood, experienced, or appreciated, in accordance with policy and guidance. As a result, Magnitude of Change is Negligible Adverse, giving rise to a Negligible Significance of Effect.			
Magnitude of Change	Negligible Adverse		Significance of Effect Negligible

Table 6.2 Impact Assessment: West Balbairdie Farm Lodge LB

HES Ref.	List Entry Name	Scale of Sensitivity	Appendix 6.1 Ref.
LB13003 ²⁵	West Balbairdie Farm Lodge	Low	2
Significance: This Category C LB comprises a single-storey lodge of classical architectural proportions, constructed in polished ashlar with tooled margins, arranged in three bays. Significance derives primarily from architectural value as well as potential historical interest in its possible former function as a tollhouse or, perhaps more plausibly, as a lodge for the 15th Century Category B Balmuto Tower²⁶. While this association is not definitively established, the building's form and location support a historic functional relationship with movement along the adjacent transport route.			
Impact Assessment: The LB is located 1.71km southeast of the proposal site and occupies a position on the northern side of an unnamed single-track road running parallel to the north of the B9157. Its setting is defined by its rural roadside location, which is consistent with either suspected historic use previously mentioned. The ZTV indicates that some visibility of the proposal may be possible from this asset. However, any such views would be limited in extent and experienced at long range, influenced by local landform as well as the intervening settlement of Auchtertool. The proposal would therefore not be apparent in a manner that would change the perception of the established setting of the LB or weaken its historic relationship with the adjacent transport route, in compliance with policy and guidance. Accordingly, the proposal will result in a Negligible Adverse Magnitude of Change, equating to Negligible Significance of Effect.			
Magnitude of Change	Negligible Adverse		Significance of Effect Negligible

²⁴ HES Ref: <https://portal.historicenvironment.scot/LB3673>

²⁵ HES Ref: <https://portal.historicenvironment.scot/LB13003>

²⁶ HES Ref: <https://portal.historicenvironment.scot/LB9686>

Table 6.3 Impact Assessment: Little Raith LB

HES Ref.	List Entry Name	Scale of Sensitivity	Appendix 6.1 Ref.
LB43660 ²⁷	Little Raith	Medium	3
Significance: As a two-storey, three-bay farmhouse, Little Raith is designated as a Category B LB and dates from the late 18th to early 19th Century. Its significance arises primarily from its architectural quality, expressed through its proportions, plan form, and surviving traditional materials and detailing, as well as its evidential value as a relatively intact example of improvement-period rural domestic architecture. Additional historical value is provided by its inclusion in the New Statistical Account of Scotland (1834 - 1845), which highlights the quality of 19th Century agricultural improvements on the Raith Estate.			
Impact Assessment: Sited within an agricultural setting consistent with its original function, the primary elevation of the asset faces north-northwest on ground described in the list description as "<i>falling to the North</i>". With the proposal site located 0.37km southeast, views in this direction do not appear to have influenced the original design or orientation of the farmhouse. While the ZTV suggests visibility of the proposal from the farmhouse, views will not materially alter the established agricultural setting of the asset, which will remain unchanged. However, it will introduce perceptible change in the wider landscape. Regardless, the key elements that combine to create the value of the asset: its form, materials and relationship with the surrounding farmland, will remain intact. Magnitude of Change is therefore Negligible Adverse. Significance of Effect, however, is regarded as Minor in line with less immediate visual impacts.			
Magnitude of Change		Negligible Adverse	Significance of Effect Minor

Table 6.4 Impact Assessment: Lambert's Mill Bridge LB

HES Ref.	List Entry Name	Scale of Sensitivity	Appendix 6.1 Ref.
LB46873 ²⁸	Lambert's Mill Bridge	Low	4
Significance: This Category C LB dates from the early 19th Century and consists of a "<i>small bridge with small round arch at former Mill Dam</i>". It is constructed of roughly coursed rubble with voussoirs and has a low parapet wall with coping. As all that remains of Damhead, with the nearby associated Mill having been largely altered and value lost, this asset is of historic and associative heritage significance.			
Impact Assessment: Located 1.76km southeast of the proposed development, the setting of the bridge is defined by its historic function as a crossing over the watercourse that led to Lambert's Mill (now Lamberts Mill Farm) and forms part of a single-track transport route within an agricultural landscape. The proposed development may be visible from this location, as indicated by the ZTV; however, topography and vegetation will largely screen any significant views. As a result, there will be no material visual disruption to the historic association with Lambert's Mill to the east, with the understanding, experience and appreciation of the bridge, including its setting, unaffected. Magnitude of Change is therefore Negligible Adverse, with Significance of Effect also Negligible.			
Magnitude of Change		Negligible Adverse	Significance of Effect Negligible

²⁷ HES Ref: <https://portal.historicenvironment.scot/LB43660>

²⁸ HES Ref: <https://portal.historicenvironment.scot/LB46873>

Table 6.5 Impact Assessment: Raith Park and Beveridge Park GDL

HES Ref.	List Entry Name	Scale of Sensitivity	Appendix 6.1 Ref.
GDL00323 ²⁹	Raith Park and Beveridge Park	High	Named
Significance: The GDL dates from the late 17th Century through to the early 19th Century, and originally formed a formal landscape known as Raith Park. A section was sold in 1890 to create Beveridge Park as a public park. The landscape was principally designed in 1783 by Thomas White, with architectural elements by James Playfair, though it was expanded and adapted across later years. Historical and Architectural interests are classed as Outstanding, reflecting the importance of the GDL in illustrating the evolution of private and public landscape design in proximity to a major industrial town, as well as its associations with notable families and prominent designers and architects. Artistic and Scenic interests are defined as High due to the value of the GDL as a representative example of Thomas White's landscape design, its contribution to the character of the outskirts of Kirkcaldy, and the importance of long-distance views to Raith House and its estate grounds (policies) from surrounding elevated land.			
Impact Assessment: Located 1.53km from the development and only partially within the area of focus, the setting of this asset comprises the designed estate and surrounding landscape, including woodland, parkland, formal gardens, and water features. Key elements of the setting include the topography and elevated ground, which provide important long-distance views to and from the house, as well as visual connections with the outskirts of Kirkcaldy. The setting also reflects the historic evolution of the GDL and contributes to the appreciation of its historical, architectural, artistic, and scenic significance. The ZTV suggests slight, scattered visibility of the proposal from the western edges of the GDL. Although some visibility may occur, the asset's significance is closely linked to Kirkcaldy to the east and the relationship of the parks with Raith House, also to the east. As such, while a small area of the GDL may experience visibility of the development, this will not meaningfully alter the perception of this designated landscape within its setting. Magnitude of Change is therefore Negligible Adverse. Significance of Effect is assessed as Minor, reflecting a limited impact of the proposal on the wider landscape context.			
Magnitude of Change	Negligible Adverse	Significance of Effect	Minor

6.2. Non-Designated Heritage Assets

Direct physical impacts have been identified for three HER points located within the site area. No significant impacts are expected beyond the boundary of the proposal. Assessment, therefore, focuses proportionately on these three assets, as illustrated in Appendix 6.2.

The Heritage Site Evaluation (Appendix 2.1) contains detailed descriptions of these HER assets, including a photographic record, as well as an assessment of their heritage values. The following tables define the value of these assets and evaluate the impact of the proposal.

²⁹ HES Ref: <https://portal.historicenvironment.scot/GDL00323>

Table 6.6 Impact Assessment: Camilla: Castle

Fife HER ID/NRHE ID	HER Entry Name	Scale of Sensitivity	Appendix 6.2 Ref.
MFF4043/52987 ³⁰	Camilla: Castle, formerly known as Hallyards	Low	A

Significance: Camilla: Castle survives as visible ruins and is recorded in the HER as the remains of a former castle. Evidence indicates occupation and construction on the site prior to 1539, with the estate passing through multiple ownerships until its abandonment in 1793. Progressive deterioration resulted in much of the structure being demolished by 1847. The present-day remains are not structurally sound. It is also considered likely that a significant quantity of stone from the Castle was reused in the construction of the nearby Cottage Row (Camilla: Building, Table 6.7).

Based on its non-designated status, the limited extent of visible historic fabric, and the uncertain survival of below-ground archaeological remains, this asset is classed as of Low Sensitivity.

The significance of this HER is principally derived from its local archaeological potential, reflecting the currently uncertain extent, character, and survival of below-ground remains, alongside local-level historical and associative value. The surviving above-ground remains are limited and do not meet the criteria for scheduling or listing at a national level.

Impact Assessment: The development proposes to demolish and fully remove the remains of this castle to facilitate the data centre development. Magnitude of Change is therefore High Adverse, due to the direct physical impact from total loss of the asset.

However, the asset is a non-designated HER feature of low sensitivity and of local significance, with limited surviving and unstable fabric. Whilst its proposed loss will remove physical remains, the primary value of the asset lies in its archaeological potential, rather than its extant built form. As such, the resulting Significance of Effect is assessed as Moderate.

Appropriate mitigation, through archaeological investigation and recording, as discussed in Chapter 7, will ensure the asset is documented, thereby providing opportunity to increase knowledge and understanding of the site and its origins, and contribute to a broader understanding of past human activity.

Magnitude of Change	High Adverse	Significance of Effect	Moderate
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³⁰ trove.scot: <https://www.trove.scot/place/52987>

Table 6.7 Impact Assessment: Camilla: Building

Fife HER ID/NRHE ID	HER Entry Name	Scale of Sensitivity	Appendix 6.2 Ref.
MFF4058/139237 ³¹	Camilla: Building	Low	B

Significance: Camilla: Building refers to the single-storey building located to the west of Camilla: Castle (Table 6.6). The building is not watertight and is in a poor state of repair, with dirt floors. The southern section is no longer roofed and contains internal vegetation, while the central section appears to be used intermittently to house livestock and is roofed with corrugated iron, which extends to the northern part of the building. Also known as Cottage Row, this HER is believed to have been constructed using material reused from Camilla: Castle, suggesting a 19th Century date of construction. The significance of Camilla: Building is primarily derived from its associative relationship with Camilla: Castle. This associative value is of local importance, though of lower value than that attributed to the Castle. The potential for the survival of significant unknown archaeological remains below ground is also considered low. On this basis, Camilla: Building is assessed as being of local value and Low Sensitivity, and does not meet the criteria for statutory designation.

Impact Assessment: The proposal would result in the demolition and complete removal of this HER asset. Whilst this asset is of lower significance than Camilla: Castle, Magnitude of Change is equally High Adverse due to the complete loss of the asset and the resultant direct physical impact.

The asset is non-designated and comprises a commonly occurring building type that is well represented within the local and wider environment. Any reused fabric from Camilla: Castle, should this be present, has been removed from its original context and therefore retains limited heritage value. There is uncertainty regarding the quality and survival of any below-ground archaeological remains, with the potential for significant unknown remains considered low. On this basis, the Significance of Effect is assessed as Moderate in relation to the loss of this asset from the finite historic environment resource.

Appropriate mitigation is recommended to record and preserve information, as set out in Chapter 7.

Magnitude of Change	High Adverse	Significance of Effect	Moderate
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³¹ trove.scot: <https://www.trove.scot/place/139237>

Table 6.8 Impact Assessment: Auchtertool Branch - Railway

Fife HER ID/NRHE ID	HER Entry Name	Scale of Sensitivity	Appendix 6.2 Ref.
MFF9850	Auchtertool Branch - Railway	Low	Named
Significance: The Kirkcaldy & District Railway was authorised in 1890 and connected Kirkcaldy to Cowdenbeath via Auchtertool. Constructed as a freight-only line, it was intended to relieve pressure on the main railway network by facilitating the transport of coal from the Cowdenbeath coalfields, including Cowdenbeath Colliery. The line closed in October 1960 following the closure of the colliery and a subsequent reduction in freight demand³². Whilst the route of the railway remains partially evident across the site, above-ground remains are limited, consisting primarily of a single bridge. The bridge is of ashlar construction with a red brick arch and appears to be in relatively good condition. Heritage significance derives from the association with the industrial expansion of the late 19th Century and the infrastructure developed to support coal extraction and transportation. Although the railway alignment remains partially legible on site, dividing the surrounding agricultural fields, comparable examples of dismantled mineral and freight railways are widespread across the UK, with similar bridges in existence. As such, the feature does not meet the criteria for national designation. Its sensitivity is therefore assessed as Low, with cultural heritage value at a local scale.			
Impact Assessment: As a linear transport corridor, the setting of the former railway extends across a broad landscape. This assessment focuses on the section of the line located within the development boundary. In an agricultural setting, the dismantled line dissects the development site. Whilst a central section falls within the areas proposed for construction, it does not represent a well-preserved or intact heritage asset, particularly in this area where historic infilling is apparent. The former railway line has been disrupted at multiple locations beyond the development, notably by the substation to the north of Mossmorran NGL Plant, as well as through agricultural activity and the removal or infilling of above-ground evidential remains. Consequently, the impact on setting, as well as directly on potential remnants of fabric that may be lost by the removal of a section of this asset, will not result in a significant impact in isolation. However, it will contribute to the cumulative loss of a further portion of an already fragmented feature. Given that the asset is of local heritage interest rather than national importance, and a common occurrence across Scotland, this loss and the impact to setting cannot be classified as of High Magnitude. Magnitude of Change is therefore Medium Adverse, with the Significance of Effect Minor. The former railway corridor has been identified as a potential area for enhancement in terms of public leisure access, though it will require some redirection of the route. Aimed at addressing the loss of part of this asset, this mitigation would enhance public understanding and appreciation of the historic environment (see Chapter 7).			
Magnitude of Change	Medium Adverse	Significance of Effect	Minor

³² Railscot: https://www.railscot.co.uk/companies/K/Kirkcaldy_District_Railway_North_British_Railway/

7. MITIGATION

As detailed in Chapter 6, the consequences of development fall within the Moderate to Minor Significance of Effect category due to direct physical impacts for three HER heritage assets. These impacts result from the total loss of both Camilla: Castle and Camilla: Building, and the loss of a section of the linear Auchtertool Branch – Railway. A programme of suitable archaeological works is therefore proposed to mitigate these impacts, in accordance with NPF4, as well as best practice as outlined in PAN 2/2011. This is also consistent with the advice provided by the FCAU (see Section 2.6). This mitigation intends to reduce the anticipated effects of the development.

7.1. Staged Approach

The proposed programme of archaeological works is proposed to be staged, broadly as follows:

Stage 1: Submission of a Written Scheme of Investigation (WSI)

Stage 2: Archaeological Evaluation

Stage 3: Archaeological Mitigation Measures

Stage 4: Post-Excavation Analysis and Publication

7.1.1. Stage 1: WSI

A WSI will be submitted to FC and FCAU, detailing a robust 'preservation by record' methodology. This will include standing building recording, 100% open-area excavation and appropriate post-excavation research and publication for both Camilla: Castle and Camilla: Building. The WSI will also outline a programme of intrusive archaeological works for the wider development site to assist in mitigating the complete loss of non-designated assets on site, likely an 8% sample of the overall site area, and including areas planned for construction along the former railway line.

7.1.2. Stage 2: Archaeological Evaluation

This stage will consist of standing building recording and 100% open area excavation of both Camilla: Castle and Camilla: Building, as planned in the WSI.

Investigative trenching will also be undertaken across the wider development site before the commencement of any construction works, as agreed in the WSI, excluding areas that are inaccessible due to site limitations. Depending on the results, additional archaeological works may be required.

7.1.3. Stage 3: Further Archaeological Mitigation Measures

Should significant archaeology be identified during the investigatory archaeological works, additional mitigation will be required and must be agreed in advance with FCAU. This may include further fieldwork or design amendments to allow for preservation in situ, either ensuring impacts are avoided or appropriately reduced in line with standard mitigation practices.

7.1.4. Stage 4: Post-Excavation Analysis

The final stage will involve analysing recovered archaeological data, followed by the preparation and subsequent publication of results in accordance with recognised professional standards. This could lead to the installation of interpretive signage along a redirected walking route, possibly at the bridge belonging to the dismantled Auchtertool Branch railway line. This would allow for an illustration of the cultural and industrial history of the site, incorporate the

results of archaeological investigation, and further mitigate for the loss of a section of this former transport corridor. In doing so, enhancement and improvement will occur, relating to increasing the understanding, experience and appreciation of the dismantled rail route by creating an accessible, informative pedestrian pathway. Details on the specific approach will be submitted on the basis that this forms a condition of consent.

7.2. Mitigating Summary

Archaeological works, as proposed, intend to mitigate impacts as assessed in Chapter 6. With the proposed measures in place, residual impacts on the historic environment will be appropriately mitigated, and the record of the assets will be preserved for future research, despite the physical loss of the structures. It is expected that this will form a Condition of Planning Consent, to allow further evolution of detail. Agreement will be required from FCAU, as well as FC, with all works completed to their satisfaction.

8. POLICY ANALYSIS

This policy assessment evaluates the proposal against the historic environment policies contained within NPF4 and Policy 14: Built and Historic Environment of FIFEplan. Given that the proposal will result in the total loss of two non-designated heritage assets recorded on the HER, and partial loss of a third, this analysis also considers PAN 2/2011. Whilst PAN 2/2011 does not form part of the statutory development plan, it is a material consideration that sets out national expectations for the treatment of archaeological remains, including the circumstances in which preservation in situ is not achievable and the subsequent requirements for appropriate evaluation, mitigation and preservation by record. Impacts on designated assets are not analysed in detail against policy due to the Negligible/Minor Significance of Effect as anticipated in the assessment of Chapter 6.

8.1. National Planning Framework 4

Policy 7 of the NPF4 (Historic Assets and Places, pages 45 – 47)³³ seeks to protect and enhance heritage assets, recognising the contribution that the historic environment makes to cultural identity, quality of life, and the economy. This Policy requires Planning Authorities to consider the importance of protecting and/or enhancing heritage assets, their settings, and any other features of special architectural or historic interest. It also emphasises the need to take account of evidence regarding asset significance, including non-designated features recorded on the HER.

The three HER assets affected by the proposed development have been assessed in Chapter 6 as being of local value, with no statutory designation or national importance. Site design and layout evolution have sought to avoid or minimise impacts; however, given the scale, operational requirements, and locational constraints of the proposed data centre, total loss is unavoidable.

In line with NPF4 policy, mitigation measures are proposed to record and preserve the archaeological interest by record, as set out in Chapter 7 and discussed with FCAU (subsection 2.7). Subject to these measures being secured by condition, the proposal will comply with the objectives of NPF4, balancing the permanent loss of non-designated assets against wider planning considerations, including strategic infrastructure benefits.

8.2. FIFEplan

FIFEplan Policy 14: Built and Historic Environment³⁴ sets out the criteria for development affecting heritage assets and their settings within the Council boundary. Of particular relevance:

"All archaeological sites and deposits, whether statutorily protected or not, are considered to be of significance. Accordingly, development proposals which impact on archaeological sites will only be supported where:

- *remains are preserved in-situ and in an appropriate setting; or*
- *there is no reasonable alternative means of meeting the development need and the appropriate investigation, recording, and mitigation is proposed."*³⁵

³³ NPF4: <https://www.gov.scot/publications/national-planning-framework-4/>

³⁴ FIFEplan: <https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/local-development-plan-FIFEplan>

³⁵ FIFEplan: <https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/local-development-plan-FIFEplan>

The three HER assets affected are non-designated, of local significance and will be lost from the finite heritage resource. Reasonable alternatives and design refinements have been considered to avoid or reduce impacts, however, are constrained by the functional requirements of the data centre.

In accordance with Policy 14, mitigation through recording and analysis is proposed (Chapter 7) to be secured by a reasonably worded planning condition. Subject to implementation, this approach ensures that the archaeological interest is preserved by record and aligns with the aims of this Policy, recognising that residual effects may occur but are mitigated through the opportunity created to recover and obtain archaeological information.

8.3. Planning Advice Note 2/2011: Planning and Archaeology

PAN 2/2011³⁶ sets out national guidance for the consideration of archaeological remains, establishing that preservation in situ is the preferred option, but recognising that preservation by record may be acceptable where in situ preservation is not practicable.

Two non-designated HER assets will be subject to total removal, whilst one will experience partial loss. Assessment in Chapter 6 identifies these assets as locally significant and of low value, with no statutory designation and no evidence to suggest national significance or reason for designation. Alternatives to avoid or reduce impacts have been considered through site design and layout evolution. However, due to the scale, operational requirements, and locational constraints of the proposed development, preservation in situ is not achievable, and the loss is unavoidable.

In accordance with PAN 2/2011, mitigation through recording, analysis, and dissemination is proposed (Chapter 7), to be secured by a planning condition. Subject to these measures, the archaeological interest of the site will be preserved by record, and the loss of physical remains mitigated through recovery and retention of archaeological information. The residual effect on the archaeological resource remains adverse due to permanent loss, but PAN 2/2011 clarifies that such effects can be acceptable where justified by wider planning considerations and where appropriate mitigation is secured, as proposed.

8.4. Policy Conclusions

The proposed data centre will result in the permanent loss of two non-designated HER assets and partial removal of a third: all three assessed as being of local significance and low value (Chapter 6). Mitigation through archaeological recording, analysis, and dissemination (Chapter 7) is proposed to preserve the significance of these assets by record and to ensure that their evidential value is appropriately captured and made publicly accessible.

In accordance with NPF4 and FIFEplan Policy 14, the unavoidable loss is justified by wider planning considerations, and the proposed mitigation aligns with national and local policy objectives. PAN 2/2011 confirms that where in situ preservation is not practicable, preservation by record can be acceptable. Subject to the implementation of the proposed measures, the proposal will comply with statutory and material heritage policies.

³⁶ PAN 2/2011: <https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>

9. CONCLUSION

This desk-based assessment has evaluated the potential effects of the proposed development on designated and non-designated heritage assets, including settings, within a 2km search area. Consideration focuses on those assets at greatest potential risk. In line with NPF4, change within the historic environment is considered acceptable where it is carefully managed, justified, and contributes to sustainable development.

In this instance, no harm will occur to the fabric or key characteristics of any designated asset, and setting impacts are limited to the introduction of new built form, remaining well below the threshold of unacceptable harm. Two non-designated HER assets will be lost, and a section of a third HER will be removed. All three are considered of local value and low significance. Their loss will be appropriately mitigated, in accordance with advice, policy and guidance. The archaeological potential of the site as a whole will also be addressed through investigation and recording. The development delivers significant public benefits, including essential digital infrastructure, investment, skilled employment, and contributions to net zero and climate adaptation objectives, in line with the intentions of NPF4.

These conclusions are based on a reasoned evaluation of development plan policy, supported by a proportionate programme of archaeological mitigation in accordance with PAN 2/2011. On this basis, heritage impacts will be mitigated and outweighed by wider public benefits. The proposal therefore complies with NPF4, FIFEplan Policy 14, as well as guidance provided in PAN 2/2011.



HERITAGE SITE EVALUATION

Cato, Fife

Applicant: ILL Cato Ltd.

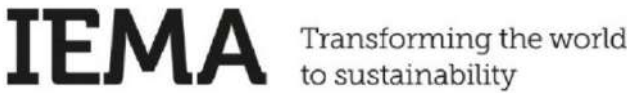
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Document Abbreviations

Abbreviation	
HES	Historic Environment Scotland
FC	Fife Council
OD	Ordnance Datum
NGL	Natural Gas Liquids
BESS	Battery Energy Storage System
NLS	National Library of Scotland
HER	Historic Environment Record
NRHE	National Record of the Historic Environment
NPF4	National Planning Policy 4
HEPS	Historic Environment Policy for Scotland
SPP	Scottish Planning Policy
HLA	Historic Land-Use Assessment
LPA	Local Planning Authority
WSI	Written Scheme of Investigation

Document Attachments

Document Title	Description
Appendix 5.1	Photography Locations
Appendix 5.1 a	Site Photography
Appendix 5.2	Summary of Findings
Appendix 6.1	NRHE Entries

1. EXECUTIVE SUMMARY

LoganPM Ltd. are leading a development proposal on behalf of ILI Cato Ltd., on land to the north of Auchtertool, Mossmorran, Fife, KY2 5XW, currently known as Cato. This report establishes the baseline historic environment within the site, including locating and characterising both known and unknown heritage within the area of potential development. The evaluation concludes that in order to enable development of the site, there are three options relating to two HER points: Camilla: Building and Camilla: Castle.

Option 1: *Retain all heritage assets in situ.* This is the least disruptive approach, fundamentally aligned with the principles of national and local heritage policies (NPF4, HEPS, SPP, PAN2/2011, FIFEPlan). While impacts to setting may occur due to increasing industrial development surrounding the two HER sites, this option preserves the local cultural and potential archaeological significance of the assets.

Option 2: *Remove Camilla: Building; retain Camilla: Castle.* Given the poor condition of Camilla: Building and its associated limited heritage value, removal would likely be considered less than substantial loss to the historic built environment if balanced with demonstrable public benefits. Mitigation would be required via archaeological excavation and recording, with the degree and level of works submitted to and approved by FC Archaeological Unit prior to works commencing.

Option 3: *Remove both Camilla: Building and Camilla: Castle.* This option involves the greatest impact in terms of loss to the heritage resource, particularly due to the greater cultural value derived from Camilla: Castle. It is essential that justification is robust and supported by comprehensive mitigation, including 100% open area excavation, building recording, and dissemination of findings. Additional site-wide trenching (minimum 8%) is recommended to further investigate the broader archaeological potential of the area as a whole, as well as further mitigate against the loss to historic built environment of both HER sites.

2. INTRODUCTION

2.1. Scope of Evaluation

Cogeo Planning & Environmental Services Ltd was commissioned by LoganPM Ltd., on behalf of ILLI Cato Ltd., to undertake a heritage evaluation, supported by a walkover, for the proposed development site on land to the north of Auchtertool, Mossmorran, Fife, KY2 5XW. The project is in the early stages of development, with a site design yet to be finalised and is known as Cato, Auchtertool.

2.2. Aims and Objectives

The historic environment is defined as “*the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand*”¹. The importance of protecting this historic environment is widely recognised; however, this protection is not necessarily to prevent development but is instead to enable the positive management of any change. This is informed by understanding the value of the heritage assets likely to be affected.

This evaluation aims to establish the baseline historic environment within the proposed development boundary, including locating and characterising both known and unknown heritage within the development area, through a desk-based assessment.

A walkover survey of the study area was undertaken on 15th April 2025 to allow characterisation of any surviving above ground archaeological or historic remains and facilitate the definition of any key attributes, including their significance. The walkover survey sought to identify new, previously unrecognised heritage assets.

2.3. Area of Evaluation

The evaluation area covers approximately 72ha of predominantly agricultural land, to the west of Auchtertool, approximately 3.5km from Cowdenbeath and within Fife Council boundary. The rural site is undulating, reaching at highest approximately 133m above Ordnance Data (OD) and at lowest approximately 115m above OD. Electrical infrastructure crosses the site in multiple directions and Dronachy Burn bisects the site. Figure 2.1 shows the area of evaluation, also displaying the wider context.

¹ National Planning Framework 4 (2024) – Glossary of definitions: <https://www.gov.scot/publications/national-planning-framework-4/>

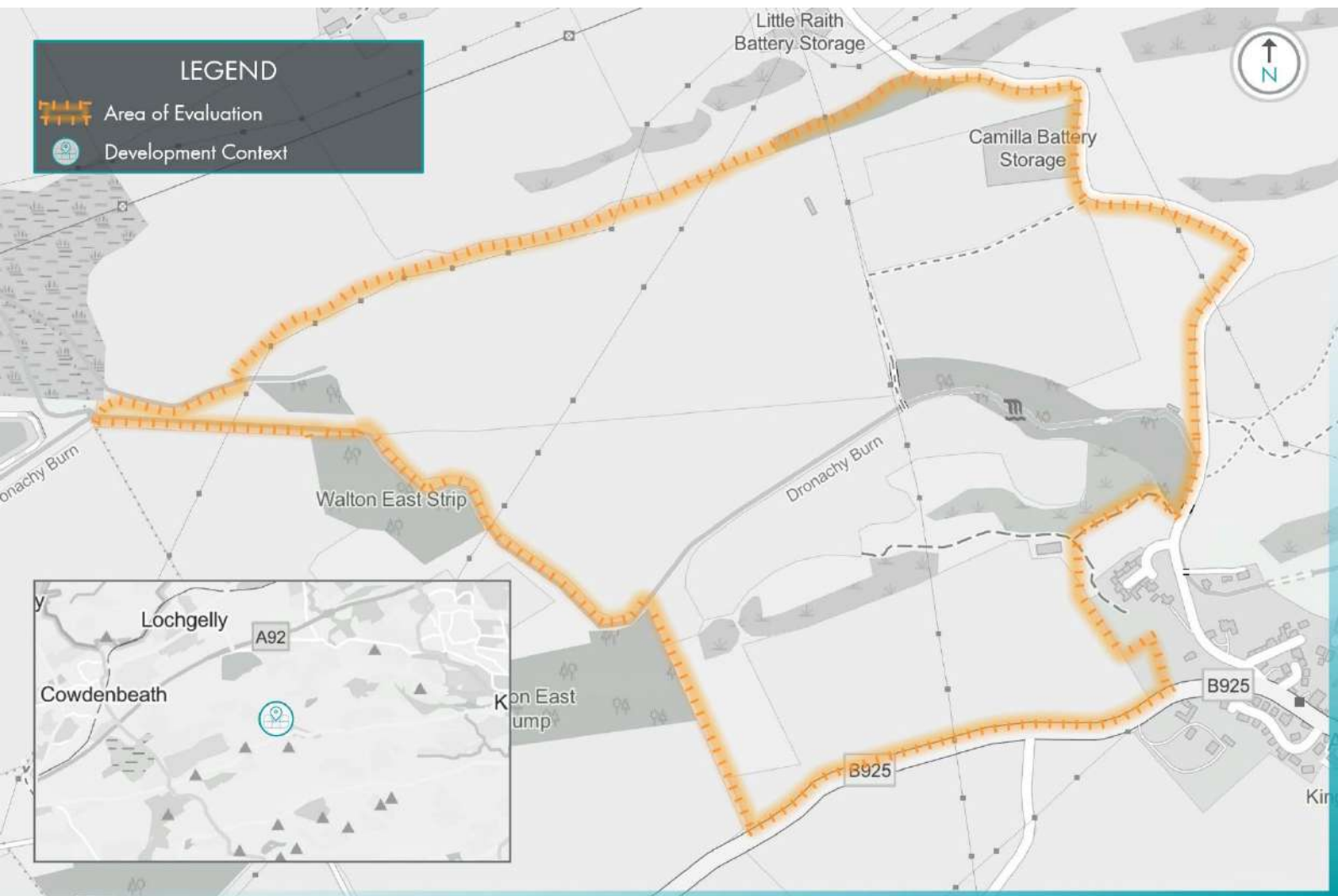


Figure 2.1 Area of Evaluation and Context

There is large scale development present in the wider environment, with Mossmorran Natural Gas Liquids (NGL) Plant and the windfarms at Clentrie and Little Raith of note. Camilla Battery Energy Storage System (BESS), which forms part of the area of evaluation, was granted planning permission in 2017 (Application Ref: 17/00483/PPP), with this permission renewed in 2020 (Application Ref: 20/00126/PPP)². Little Raith BESS and Glenniston Substation also sit to the immediate north of the site, in addition to the presence of electricity pylons stretching in multiple directions. Combined, this creates an established and increasing industrial character surrounding the area of evaluation.

2.4. Consultee Engagement

The Archaeological Unit at Fife Council (FC) advises on archaeological and heritage matters. Engagement with the Archaeological Unit was undertaken with opinion invited regarding the value of existing undesignated assets within the evaluation boundary in order to guide proposals, either through retention or removal of these assets. Stephen Liscoe, Professional Assistant, provided the following response on 6th June 2025:

² FC Planning Portal: <https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/planning-applications/view-track-and-comment-online>

"...the two apparent options with regards to the intended development of the battery storage site would be to incorporate the remains into the planned layout of the development or to remove them.

Our default position would be for the remains to be preserved in situ, but if it could be justified that this were not possible then development could be acceptable.

However, for the clearance and development of the Hallyards site to be acceptable, its loss would have to be preceded by a robust 'preservation by record' involving building recording, 100% open area excavation and suitable publication as mitigation.

The Council's approach to the protection of non-statutorily protected archaeological assets is shaped by NPF4, Policy 7; by Planning Advice Note 2/2011: Planning and Archaeology, and by the LDP (FifePlan) Policy 14. Our position is also defined by Scottish Planning Policy (2014) paragraphs 135-151: Valuing the Historic Environment, particularly paragraph 150 'Archaeology and Other Historic Environment Assets'.

Whilst the removal of the 'cottage row' would not present a substantial loss to the historic built environment, and proportionally not at substantial financial cost, the removal of the more extensive area occupied by the remains of Hallyards Castle and its predecessors would have a more considerable implication in both matters."

Any requirement for archaeological work prior to or during any future permitted development will be established through consultation with the Unit.

The Historic Environment Record (HER) for Fife Council was also consulted, sent by Stephen Liscoe at the Archaeological Unit on 3rd April 2025. This information was sent as an audit due to GIS data no longer being available for distribution. Further advice noted that much of the record is duplicated on Canmore (now [trove.scot](https://www.truve.scot/)³) and Pastmap, whilst statutory designations are available from HES.

³ HES, trove.scot: <https://www.truve.scot/>

3. LEGISLATION, POLICY AND GUIDANCE

By providing a framework to guide development and minimise/negate any negative impacts or resultant effects, heritage legislation, planning policy and best practice guidance aims to protect, conserve, and/or enhance the historic environment.

The statutory planning framework for heritage in Scotland is laid out in the Town and Country Planning (Scotland) Act 1997⁴, as amended in updates to the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997⁵ and the Ancient Monuments and Archaeological Areas Act 1979⁶. Both these latter Acts have likewise been revised by the Historic Environment (Amendment) (Scotland) Act 2011⁷.

Whilst these legislative Acts provide the planning framework for heritage, the consequences in relation to local government policy and guidance are set out within four main policy documents: National Planning Framework 4 (NPF4) (2023); Historic Environment Policy for Scotland (HEPS) (HES, 2019); Scottish Planning Policy (SPP) (2014); and Planning Advice Note 2/2011: Planning and Archaeology. Fife Council Local Development Plan, known as FIFEPlan (2017), guides development at a local level.

3.1. National Planning Framework 4

Policy 7, contained within the Historic Assets and Places Chapter of the NPF4 (pages 45 – 47)⁸, aims to protect and enhance heritage assets. It also recognises the social, environmental and economic contribution that the historic environment makes to our economy, cultural identity, as well as quality of life. This section of NPF4 deals specifically with all aspects of the historic environment. Planning authorities and developers are required to give special consideration to the importance of protecting and/or enhancing any of these heritage assets, their setting and any other features of special architectural or historic interest to facilitate positive change as a catalyst for the regeneration of places.

3.2. Historic Environment Policy for Scotland

HEPS⁹ provides guidance for the management of the historic environment, working towards the shared vision: *"Scotland's historic environment is understood and valued, cared for and protected, enjoyed and enhanced. It is at the heart of a flourishing and sustainable Scotland and will be passed on with pride to benefit future generations"*. The aim of this document is to protect and enhance the historic environment and it emphasises the importance of understanding cultural significance in decision-making. HEPS also accepts that some degree of change is inevitable and may be needed for areas to prosper. Policy HEP4 details that where detrimental impact is anticipated, it should be minimised with steps taken to *"demonstrate that alternatives have been explored, and mitigation measures should be put in place"*.

⁴ Town and Country Planning (Scotland) Act 1997: <https://www.legislation.gov.uk/ukpga/1997/8/contents>

⁵ Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997: <https://www.legislation.gov.uk/ukpga/1997/9/contents>

⁶ Ancient Monuments and Archaeological Areas Act 1979: <https://www.legislation.gov.uk/ukpga/1979/46>

⁷ Historic Environment (Amendment) (Scotland) Act 2011: <https://www.legislation.gov.uk/asp/2011/3/contents>

⁸ NPF4: <https://www.gov.scot/publications/national-planning-framework-4/>

⁹ HEPS: <https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>

3.3. Scottish Planning Policy

Paragraphs 135-151, titled 'Valuing the Historic Environment' are of relevance to cultural heritage and aims guide the role planning plays *"in maintaining and enhancing the distinctive and high-quality, irreplaceable historic places which enrich our lives, contribute to our sense of identity and are an important resource for our tourism and leisure industry"*¹⁰. The subsection entitled 'Archaeology and Other Historic Environment Assets' is of particular relevance to this evaluation, specifically paragraph 150.

3.4. Planning Advice Note 2/2011: Planning and Archaeology

PAN2/2011¹¹ intends *"to inform the day-to-day work of a range of local authority advisory services and other organisations that have a role in the handling of archaeological matters within the planning process"*. Early conversations are encouraged between Local Planning Authorities (LPAs) and developers, in order to identify potential issues as quickly as possible, therefore minimising delays in the planning process.

The Planning Advice Note aims for all assets to be protected and enhanced via preservation *in situ* where possible, however also acknowledges this may not always be achievable. In these instances, assets are required to be recorded and/or excavated, followed by investigation and subsequent publication of any findings.

Where planning applications are submitted that include features of archaeological interest, LPAs may need to *"balance the benefits of development against the importance of archaeological features"*. The consequent weight of importance given to features depends on a variety of qualities, including but not limited to: how common/rare the feature is; how well preserved/good an example of its type; any historical/cultural connections; the degree of local value; the educational potential; and possible significance of the asset in relation to tourism or enhancing sense of place.

3.5. Fife Council Local Development Plan: FIFEPlan

The Local Development Plan for Fife, known as FIFEPlan, was adopted on 21st September 2017¹². Policy 14 details planning considerations relating to the Built and Historic Environment within Fife Council Local Planning Authority boundary. Of particular significance to this evaluation is the following section:

"All archaeological sites and deposits, whether statutorily protected or not, are considered to be of significance. Accordingly, development proposals which impact on archaeological sites will only be supported where:

- remains are preserved in-situ and in an appropriate setting; or*
- there is no reasonable alternative means of meeting the development need and the appropriate investigation, recording, and mitigation is proposed.*

¹⁰ SPP: <https://www.gov.scot/publications/scottish-planning-policy/pages/5/>

¹¹ PAN 2/2011: <https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>

¹² FC FIFEPlan: <https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/local-development-plan-fifeplan>

In all the above, development proposals must be accompanied with the appropriate investigations. If unforeseen archaeological remains are discovered during development, the developer is required to notify Fife Council and to undertake the appropriate investigations."

3.6. Best Practice Guidance

Table 3.1 details best practice guidance pertaining to the historic environment.

Table 3.1 Heritage Best Practice Guidance

Document
Our Place in Time: The Historic Environment Strategy for Scotland (2014) ¹³
Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC, ClfA) (2021) ¹⁴
Historic Environment Scotland: Managing Change in the Historic Environment Series ¹⁵
Environmental Impact Assessment Handbook (HES) (SNH, now NatureScot) (2018) ¹⁶
Standard and Guidance for Historic Environment Desk-Based Assessment (CIA) (2014; updated 2017, 2020) ¹⁷
Technical Guidance Note 06/19 'Visual Representation of Development Proposals' (Landscape Institute) (2019) ¹⁸
Fife Council: Making Fife's Places Supplementary Guidance ¹⁹

¹³ Our Place in Time: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=fa088e13-8781-4fd6-9ad2-a7af00f14e30#:~:text=Our%20Place%20in%20Time%20is,historic%20environment%20sector%20and%20beyond.>

¹⁴ Principles of Cultural HIA: https://www.archaeologists.net/sites/default/files/j30361_iema_principlesofchia_v8.pdf

¹⁵ Managing Change in the Historic Environment Series: <https://www.historicenvironment.scot/archives-and-research/publications>

¹⁶ EIA Handbook: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0>

¹⁷ Standard and Guidance: https://www.archaeologists.net/sites/default/files/ClfAS%26GDBA_4.pdf

¹⁸ TGN 06/19: <https://www.landscapeinstitute.org/visualisation/>

¹⁹ Making Fife's Place SG: <https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/planning-guidance>

4. METHODOLOGY

Evaluation follows similar approach as set out in the Environmental Impact Assessment Handbook (HES/NatureScot, 2018) and the HES Managing Change in the Historic Environment series, and seeks to evaluate the likely impact on heritage assets using a four-step approach:

Step 1: Identify heritage assets.

Step 2: Define the sensitivity/significance.

Step 3: Evaluate the possible impact of the proposal on significance.

Step 4: Assess options/suitability of mitigation.

4.1. Step 1: Identifying Heritage Assets

The first stage of this assessment involves desk-based identification of heritage assets which could potentially be affected by the development, in addition to understanding the archaeological potential of the site. Sources consulted include but are not limited to Fife HER, Historic Environment Scotland (HES) data portal²⁰, trove.scot²¹, LiDAR, National Library of Scotland (NLS) mapping²², LiDAR data and Pastmap²³.

4.2. Step 2: Defining Significance

All heritage assets have significance; however, some are judged to be more important than others. This judgement is made by establishing the ability of the asset to contribute to our understanding, appreciation and/or experience of the past²⁴. The value of designated heritage assets is generally established through their designation, while non-designated assets will be assessed based on professional judgement (Negligible, Low, Medium or High).

4.3. Step 3: Evaluating Potential Impact

Analysis of the potential magnitude of impact posed by the development on each heritage asset follows. Impacts are assessed to fall within four types: direct physical, indirect physical, setting and cumulative. The magnitude of this change is then quantified under the headings Negligible, Low, Medium and High.

The sensitivity of each asset identified as potentially affected by the development is the assessed against the magnitude of change utilising with professional experience and judgement, resulting in a significance of effect. The assessment will depend on whether the potential effect would result in an impairment to the understanding, appreciation and/or experience of the heritage asset, or its setting, and therefore if its heritage significance would be reduced. The level of detail is proportionate and no more than is necessary to understand the potential impact on the significance of assets.

4.4. Step 4: Mitigation / Enhancement

Depending on the level of impact anticipated, options for mitigation may be recommended and are site specific.

²⁰ HES Data Portal: <https://portal.historicenvironment.scot/downloads>

²¹ HES trove.scot: <https://www.trove.scot/>

²² NLS: <https://maps.nls.uk/>

²³ Pastmap: <https://pastmap.org.uk/>

²⁴ HES HEPS 2019

5. IDENTIFYING HERITAGE ASSETS

5.1. Historical Development

A brief description of the historic development of the Auchtertool area permits an informed estimation regarding the potential for unknown archaeology to exist within the development site.

The town is named on Roy Military Survey of Scotland, undertaken between 1747 and 1752, though then named as 'Achtertuil'. Roy's Military Map is considered "*the most detailed and informative map that survives for the entire 18th Century, and for all areas, the only standard topographic map prior to the Ordnance Survey mapping in the 19th Century*"²⁵. This map illustrates that the evaluation area sits partly in agricultural land, though also details 'House of Camilaw' positioned within a planned landscape garden.

The approximate site location is indicated in red in Figure 5.1 overlain with the First Edition Ordnance Survey Map (1843-1882)²⁶ as published in 1856. This map demonstrates Auchtertool as well established by this time, with the distillery annotated, as well as a Corn Mill and corresponding dam. The proposed development site remains in agricultural use, though the 'House of Camilaw' is now annotated as 'Ruins of Camilla, formerly Hallyards'. An 'Old Quarry' is also annotated to the north of the site boundary.



Figure 5.1 Ordnance Survey Six-inch 1st edition (Published 1856)
© Reproduced with the permission of the National Library of Scotland (CC-BY (NLS))

Remaining evident in the Second and later editions of the Ordnance Survey Maps from 1892 to 1960 (Figure 5.2²⁷ and Figure 5.3²⁸), the Kirkcaldy & District railway line now dissects the area of evaluation. By the National Grid Maps from 1944 to 1974²⁹, the railway is annotated as dismantled (Figure 5.4).

²⁵ NLS: <https://maps.nls.uk/roy/>

²⁶ NLS: <https://maps.nls.uk/view/228777652>

²⁷ NLS: <https://maps.nls.uk/view/75533590>

²⁸ NLS: <https://maps.nls.uk/view/75533587>

²⁹ NLS: <https://maps.nls.uk/view/188146473>



Figure 5.2 Ordnance Survey Six-inch 2nd and later editions (Published 1896)
© Reproduced with the permission of the National Library of Scotland (CC-BY (NLS))

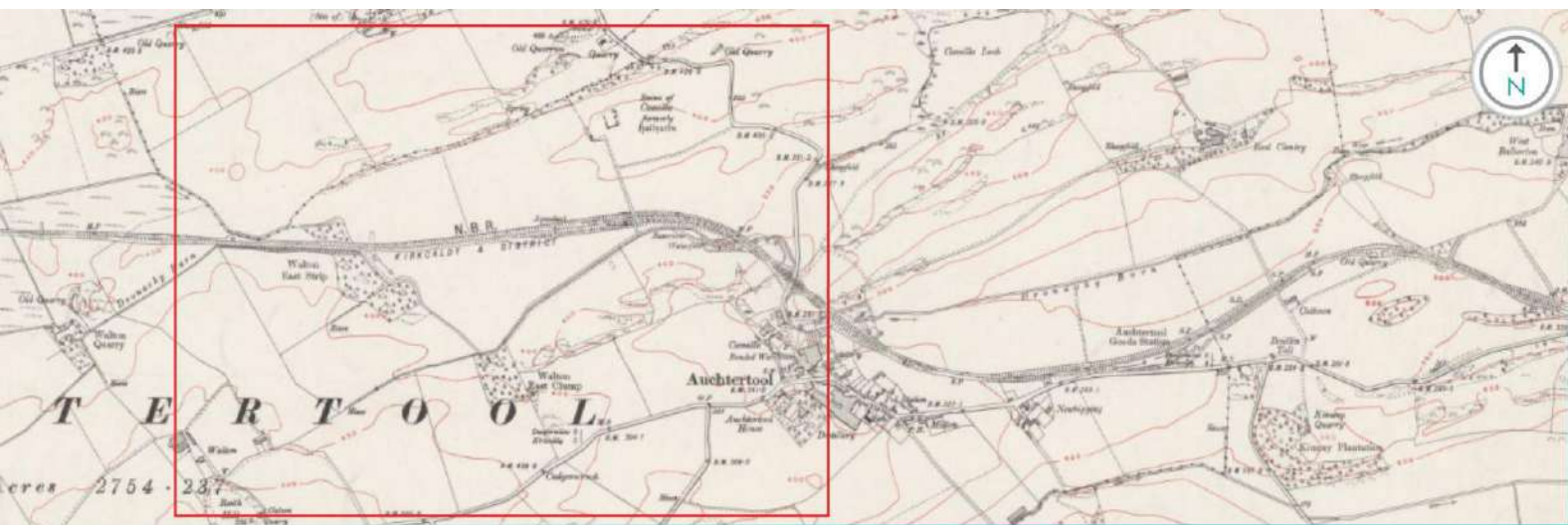


Figure 5.3 Ordnance Survey Six-inch 2nd and later editions (Published 1920)
© Reproduced with the permission of the National Library of Scotland (CC-BY (NLS))



Figure 5.4 Ordnance Survey National Grid maps (Published 1966)
© Reproduced with the permission of the National Library of Scotland (CC-BY (NLS))

5.2. Heritage Identification

Desk-based assessment identifies no statutorily designated heritage assets within the site. Two HER points are located in the boundary of evaluation however, as illustrated in Figure 5.5.



Figure 5.5 HER Points

It is also important to note the former railway route that runs through the site. Whilst not illustrated in Figure 5.5, the Fife HER refers to an 'Auchtertool Branch' classified as 'Railway' (ID: MFF9850). This asset is recorded via point data, located within fields to the east of Auchtertool (NT 2221 9111). Identified as the remains of the dismantled Kirkcaldy & District Railway, this asset illustrates the evolution of the area through the development of and then loss of a railway line and requires further evaluation.

5.3. Walkover

A site inspection was undertaken on 15th April 2025, with weather conditions dry, though cloudy overhead, and ground underfoot slightly damp. Access to the site by foot was gained via the track leading from Camilla Road at NT 21577 90940 (321577, 690940).

Appendix 5.1 illustrates locations of photography taken, indicating direction of view with photography attached as Appendix 5.1a. Appendix 5.2 provides a visual summary of features of interest identified onsite.

5.4. Historic Land-Use Assessment

The Historic Land-Use Assessment (HLA), as illustrated in Figure 5.6, shows the site as within 'Agriculture and Settlement' land from 18th Century to present, with no recorded land use prior to this time frame. Classified as 'Rectilinear Fields and Farms' in typology, this illustrates the agricultural improvements that were undertaken in the 18th and 19th Centuries to enclose arable land with boundaries designed in a rectilinear form to ensure efficiency of farming methods³⁰. As a large undulating area of land, the site is presently utilised in differing ways. The present-day use of the site remains broadly in agricultural practices, though some areas are unsuitable due to topography. Field boundaries tend to consist of post and wire fencing or utilise natural landform boundaries.

³⁰ HLAMap: <https://hlapmap.org.uk/types/1/Agriculture-and-Settlement/Rectilinear-Fields-and-Farms>

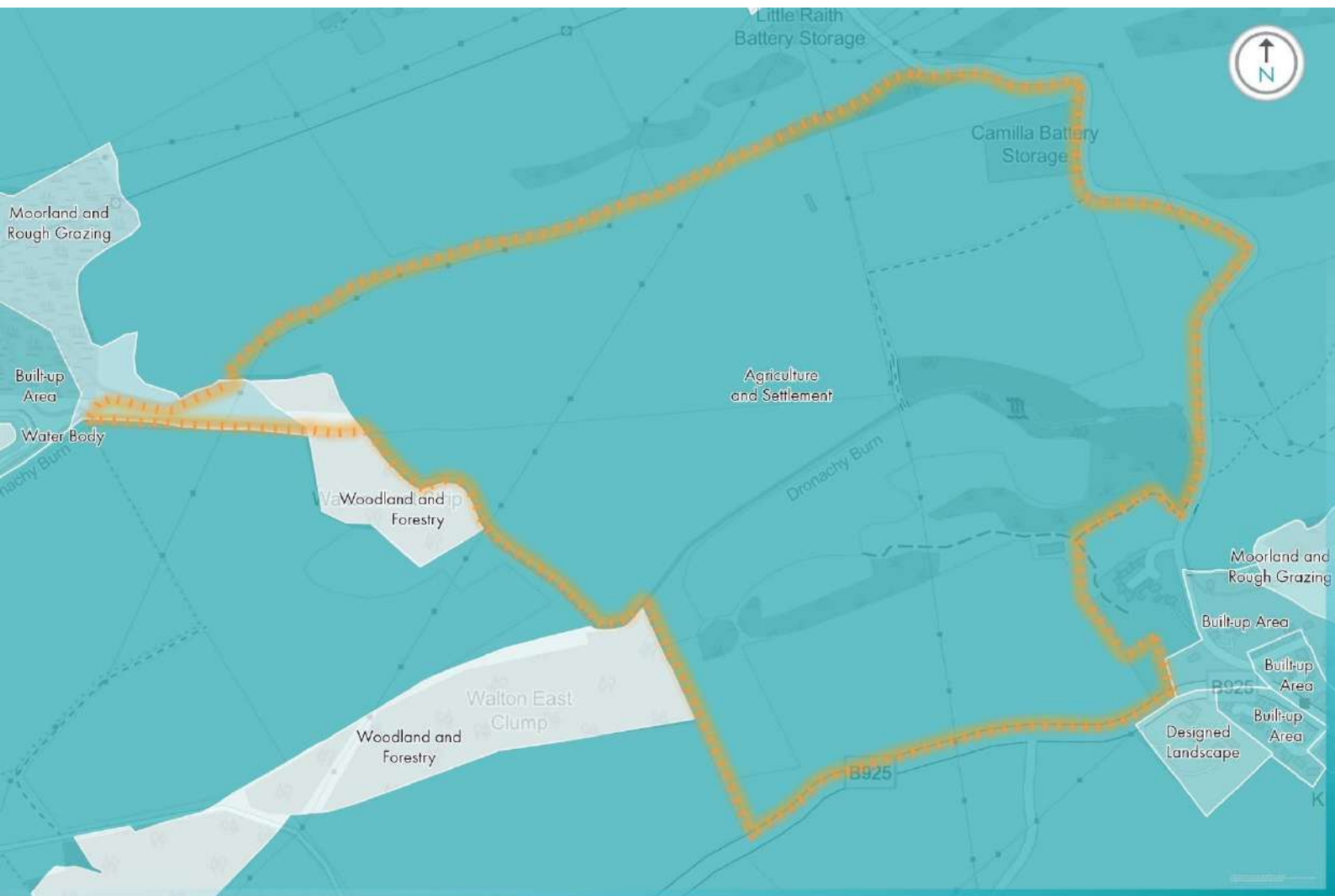


Figure 5.6 Historic Land-Use Assessment data

5.5. Aerial Imagery

LiDAR imagery data, historic and modern aerial imagery has been reviewed, with no previously unknown archaeological features discovered

5.6. Significant Assets in the Wider Environment

Whilst this report focusses on the area of evaluation, it is important to note that there are seven statutory designated assets within a 1 km buffer of the site boundary. These consist of three Category B and four Category C Listed Buildings (LBs). These assets are illustrated and detailed in Figure 5.7. Due to proximity to the development site, it is unlikely that physical impact assessments will be required in relation to any future development of the site. Setting impact assessment may be required for all seven assets, depending on likely visibility of development. An assessment of cumulative impacts may equally be required, reliant on the typology of development proposed.



Figure 5.7 Designated Assets

6. DEFINING SIGNIFICANCE

Desk-based assessment and inspection of the site finds three undesignated heritage assets requiring further assessment of significance, as well as the sensitivity of these assets to any future development on site, utilising the valuation techniques as set out in the 'Principles of Cultural Heritage Impact Assessment in the UK'³¹. Assessment of historical maps, LiDAR and HLA data finds the likelihood of unknown archaeology within the site to be limited to pre-Medieval, except from the possibility for survival of remains from the Kirkcaldy & District Railway line.

6.1. Camilla: Castle, formerly known as Hallyards

Camilla³² is the remains of what is thought to be a castle, with documentation dating building onsite pre-1539, when ownership was granted to Sir James Kirkcaldy of Grange (also written as Kirkaldie). The estate passed through multiple hands until 1715 when it was sold to Charles Stuart, the 6th Earl of Moray. The name of the castle was changed to Camilla, however from this point onwards the asset was only occasionally occupied.



Figure 6.1 Drone photo of Camilla ruins

³¹ Principles of Cultural HIA: https://www.archaeologists.net/sites/default/files/j30361_iema_principlesofchia_v8.pdf

³² trove.scot: <https://www.trove.scot/place/52987>

In 1793, the Earls of Moray departed permanently and by 1819 the condition of the building had deteriorated to the extent that the majority was demolished in 1847, leaving the ruins seen today (Figure 6.1).

It is believed that much of the stone was re-used to construct the stable block or 'Cottage Row' nearby, which appears to date from the 19th Century. Appendix 6.1 provides the full National Record of the Historic Environment (NRHE) description for this asset, with further information also available from the '*Stravaiging Around Scotland*' website³³, as referenced in the NRHE.

A sketch of the castle from William Skene's 1887 record entitled "*Memorials of the Family of Skene of Skene*"³⁴ is shown in Figure 6.2 and illustrates the original building, consisting of two tall corner towers connected by a central block. Whilst the plot remains evident and measures around 38 by 27 metres, it is currently overgrown with established trees and shrubbery growing along the boundary walls as well as inside the remains of the building.



Figure 6.2 1887 sketch from '*Memorials of the Family of Skene of Skene*'

³³ <http://www.stravaiging.com/history/castle/hallyards-castle-fife#sthash.1dJfQVR.dpuf>

³⁴ <https://dn790003.ca.archive.org/0/items/memorialsoffamil00skenuoft/memorialsoffamil00skenuoft.pdf>

The nature of the asset only remains today as unkept ruins, with limited evidence physically left above ground, taking into consideration the scale of the original structure. The level of remains below ground is unknown. As such, the value of the asset is tied to the potential for the remains below ground which may contribute to our understanding of construction materials and methods from Medieval times, as well as permit insight into the environment and economy of Auchtertool and the surrounding Fife area from this period. Whilst currently experienced within an immediate agricultural setting, industrial, as well as renewable energy developments, are a common and increasing occurrence in the wider environment. Of note is Camilla BESS located approximately 170 metres west, Little Raith BESS sits approximately 185 metres north northwest, with Glenniston Substation beyond. Equally, the windfarm developments of Clentrie and Little Raith further encapsulate this industrial character, compounded by Mossmorran NGL Plant to the southwest.

As such, significance of this HER is weighted on the potential for unknown archaeology to exist as well as the historical value of the asset through associations at a local level. The remains as seen today do not merit national designation and maintenance is required to ensure public safety.

6.2. Camilla: Building



Figure 6.3 Southern section of Camilla: Building

This record³⁵ refers to the linear single storey building, immediately to the west of the ruins of Camilla Castle. Identified under the name Camilla, though classified by type as a building to differentiate from the ruins of the Camilla Castle, this structure is also occasionally referred to as 'Cottage Row'. It is believed that much of the building was constructed re-using materials from the partially dismantled Camilla Castle. This would date the asset as from the 19th Century, which appears plausible, with no evidence on historical mapping prior to the Ordnance Survey Six-inch 1st edition (Published 1856) (Figure 5.1). The full National Record of the Historic Environment (NRHE) description for this asset is detailed in Appendix 6.1.

The building is constructed of a mix of rough and dressed ashlar stone, with corrugated iron roof. The southern most section is no longer roofed and is in a poor state of repair, with grass growing within as well as from the remains of the upstanding walls (Figure 6.3). The central section seems most maintained and experiences a wide opening which appears to allow the intermittent housing of livestock, as can be seen in Figure 6.4.



Figure 6.4 Central section of Camilla: Building

³⁵ trove.scot: <https://www.trove.scot/place/139237>

Figure 6.5 shows the northern section which remains roofed, though in poor condition. Ashlar stone quoins mark the open entrance. There is a smaller aperture, appearing window like, which has been infilled with red bricks.



Figure 6.5 Northern section of Camilla: Building

Internally, the asset has dirt floors where roofed and does not appear watertight in any of the sections previously illustrated, with many holes in the walls and roof, as shown in Figure 6.6.

The value of this asset is inherently linked to its association with Camilla Castle and the potential that physical materials from the Castle were re-used in its construction. The likelihood of significant unknown heritage to exist below ground is considered limited. As with the ruins of Camilla Castle, the immediate setting is agricultural, whilst the wider environment is increasingly industrial in character. There is limited significance aesthetically, being a commonly occurring 19th Century agricultural style structure, and the asset does not meet national designation criteria. Loss of this asset would therefore have local implications relating to the history of Camilla: Castle and the historical development of the surrounding area.



Figure 6.6 Internal photos

6.3. Dismantled Railway Line, including bridge

Evident in the Second and later editions of the Ordnance Survey Maps dated 1896 (Figure 5.2 and Figure 5.3), the Kirkcaldy & District Railway was authorised in 1890, connecting Kirkcaldy to Cowdenbeath via Auchtertool. This line was freight only and aimed to relieve the strain on main lines from coalfields. With the closure of Cowdenbeath Colliery in January 1960, relief for main lines was no longer required, leading to the closure of the line by October of the same year³⁶. This asset is included in Fife HER (ID: MFF9850), as detailed in Appendix 6.1. However, the asset is identified at a single location within fields to the east of Auchtertool (NT 2221 9111), with no additional information included in the HER entry.

³⁶ Railscot: https://www.railscot.co.uk/companies/K/Kirkcaldy_District_Railway_North_British_Railway/

The now dismantled line dissects the area of evaluation and has been infilled in places, with the bridge the main evidentiary remnant of the former freight route. Figure 6.7 illustrates the remaining accessible crossing with ashlar stone parapets, whilst Figure 6.8 illustrates the stone structure with brick archway.



Figure 6.7 Bridge over dismantled railway



Figure 6.8 Stone bridge with brick archway

Significance regarding this feature derives from the industrial revolution and subsequent pressure to transport goods to and from coalfields at Cowdenbeath. The route of the railway remains evident on site, dividing the agricultural fields; however, due to the high volume of dismantled railways across the UK, this cultural value does not meet the criteria for national designation. Significance is therefore low, at local level.

7. EVALUATING POTENTIAL IMPACT

Evaluation of potential impacts to the heritage assets identified on site depends on the design and placement of development on the site and the consequent level of impact anticipated.

Removal of the railway bridge does not appear necessary to permit utilisation of the site for development, and therefore this asset is not considered further regarding potential impacts. However, regarding the route of the former railway, additional mitigation could permit utilisation as access or a pathway to increase public gains from development of the site.

It is therefore considered that there are three options in relation to the heritage resource on site:

- **Option 1:** Retaining all assets in situ and develop part of the site
- **Option 2:** Remove Camilla: Building and retain the more significant Camilla: Castle
- **Option 3:** Remove both Camilla: Building and Camilla: Castle

7.1. Option 1: Retain Assets

This option proposes to retain the assets on site *in situ* and incorporate the remains into the planned layout of the proposed development. Whilst there would be impact regarding change within the setting of the assets, with an increasing industrial character surrounding the site, it is not unforeseeable that this could be considered acceptable, providing appropriate and proportionate assessment is undertaken.

7.1.1. Option 1: Policy and Legislation Analysis

The approach to retain all assets complies with NPF4 Policy 7o), which states: “*Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible*”³⁷. HEPS equally encourages minimal intervention. SPP details: “*Planning authorities should protect archaeological sites and monuments as an important, finite and non-renewable resource and preserve them in situ wherever possible*”³⁸, whilst PAN2/2011 further backs this approach, stating: “*Government policy is to protect and preserve archaeological sites and monuments, and their settings, in situ wherever feasible*”³⁹.

As such, this Option would be the least disruptive in terms of impacts to finite Cultural Heritage assets and would align with Policy and Legislative aims, including Policy 14 of FIFEPlan.

7.2. Option 2: Remove Camilla: Building and retain Camilla: Castle

Option 2 entails the removal of Camilla: Building to allow space for development, whilst retaining Camilla: Castle. Given the poor conditions of Camilla: Building, as well as the limited level of value as assessed in subsection 6.2, the direct physical loss of this asset would not be considered significant in terms of its inclusion as part of the Cultural Heritage

³⁷ NPF4: <https://www.gov.scot/publications/national-planning-framework-4/>

³⁸ SPP: <https://www.gov.scot/publications/scottish-planning-policy/pages/5/>

³⁹ PAN2/2011: <https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>

resource. FC Archaeological Unit agree with this conclusion, having previously stated (subsection 2.4) that: *"the removal of the 'cottage row' would not present a substantial loss to the historic built environment"*.

Further justification will be required however in terms weighing the loss of the asset against the public benefit created by the development.

7.2.1. Option 2: Policy and Legislation Analysis

Policy, Legislation and Guidance do not solely encourage the retention of heritage assets *in situ* but also realise that this is not always viable. Policy 7o) of NPF4 states: *"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"*⁴⁰.

Policy HEP4 in HEPS states: *"If detrimental impact on the historic environment is unavoidable, it should be minimised"*⁴¹. By retaining the more culturally significant Camilla: Castle in this Option, loss will be minimised as far as reasonably possible. Policy HEP4 continues: *"Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place"*⁴². Therefore, as part of a Planning Application, justification for the loss of the asset in relation to site design will be required, with reasoning provided for why the layout could not incorporate Camilla: Building as per Option 1 (7.1).

SPP equally understands that preservation in some instances is not plausible, and in these situations requires LPAs to use conditions on Planning Applications or legal obligations to *"ensure that developers undertake appropriate excavation, recording, analysis, publication and archiving before and/or during development"*⁴³.

PAN2/2011 further elaborates that not all sites and monuments are of equal value, with consideration of *'the relative importance'* necessary by LPAs during assessment of Planning Applications. In this instance, as the relative value of Camilla: Building is low, this will need to be taken into account with the weight of public benefit of the proposal balanced against the loss of the asset. This balancing act takes into consideration a variety of factors. Considering the low value of the asset, it is conceivable that the advantages of the development would outweigh the loss of the asset. Subsequently, in situations where *in situ* preservation is not achievable, PAN2/2011 continues: *"planning authorities should consider applying conditions ... to ensure that an appropriate level of excavation, recording, analysis, publication and archiving is carried out before and/or during development"*⁴⁴.

Policy 14 of the FIFEPlan details that where remains cannot be preserved *in situ*, development proposals will only be supported if the development need cannot be met without loss of archaeological sites, and appropriate mitigation is proposed through suitable investigation and recording. As such, strong justification for the need for development will be essential as part of an application, as well as an acceptable level of mitigation.

⁴⁰ NPF4: <https://www.gov.scot/publications/national-planning-framework-4/>

⁴¹ HEPS: <https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>

⁴² HEPS: <https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>

⁴³ SPP: <https://www.gov.scot/publications/scottish-planning-policy/pages/5/>

⁴⁴ PAN2/2011: <https://www.gov.scot/publications/pan-2-2011-planning-archaeology/>

7.2.2. Option 2: Recommended Mitigation

To minimise impacts resultant from the removal of this asset and ensure full compliance with Policy and Legislation, it is recommended that excavation and recording of Camilla: Building is undertaken, with subsequent analysis and archiving of any finds. This can be carried out prior to submission of a future Planning Application, though the degree and level of works are required to be submitted to and approved by FC Archaeological Unit by way of a Written Scheme of Investigation (WSI) prior to any works commencing. Equally, excavation and recording of the asset could be conditioned as part of a Planning Permission.

Whilst the destruction of this asset would result in the loss of historic fabric, the information and knowledge gained via mitigation through careful removal and recording may result in greater comprehension of the past, in turn creating a beneficial outcome.

7.3. Option 3: Remove both Camilla: Building and Camilla: Castle

Option 3 details the potential to remove both Camilla: Building as well as Camilla: Castle and as such involves a greater impact to the heritage resource due to the higher significance embodied in the remains of the castle. This does not indicate that removal is impossible, however greater justification will be required. It should equally be noted that the remains of Camilla: Castle are not stable and may become an issue of public safety.

Consultee engagement with FC Archaeological Unit provided the following advice *"for the clearance and development of the Hallyards site to be acceptable, its loss would have to be preceded by a robust 'preservation by record' involving building recording, 100% open area excavation and suitable publication as mitigation"*.

7.3.1. Option 3: Policy and Legislation Analysis

The analysis of relevant policy and legislation for this Option is as per that of Option 2 (7.2.1), though justification would be required to be considerably more robust given the higher status of Camilla: Castle and the consequent higher level of loss from the finite heritage resource. Equally, significantly more mitigation measures would be required to balance the weight of loss against the gain of knowledge and understanding.

7.3.2. Option 3: Recommended Mitigation

The heavier weight of perceived cultural value of Camilla: Castle is attributed to the potential for unknown archaeology to exist as well as the historical value of the asset through associations at a local level, with national designation not warranted. As such, to reduce and mitigate against the loss of this asset as well as Camilla: Building, it is considered essential that building recording, 100% open area excavation and publication/archiving of findings is undertaken. It is possible to carry out works such as these prior to submission of a Planning Application, though the degree and level of works are required to be submitted to and approved by FC Archaeological Unit by way of a Written Scheme of Investigation (WSI) prior to any works commencing. Equally, excavation and recording of the asset could be conditioned as part of a Planning Permission.

To balance the weight in favour of public benefits over the degree of loss of these assets, it is also proposed that trial trenching is undertaken of at least an 8% sample size of the whole development site. This will allow opportunity for the archaeological potential of the site preceding recorded history (Medieval onwards) to be better understood, leading to an increase in knowledge and understanding of the archaeological potential and the possibility that this will develop the evidence or indeed lack of historic human activity in this area.

It is of value to note that HEPS details the importance of identifying “*opportunities for furthering our knowledge and understanding where possible*”⁴⁵. Therefore, whilst Option 3 would result in the loss of both assets, opportunity would be created to expand understanding and knowledge, therefore creating a positive outcome and additional benefit resultant from development of the site.

⁴⁵ HEPS: <https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>

Appendix 5.1

Photography Locations



- Area of Evaluation
- Photo
- Drone

Map Details
Map illustrating the area of evaluation, showing location and direction of photography, correlating and cross-referenced to photographs as detailed in Appendix 5.1a.

Scale: 1:5,000 @ A3

0 100 200 m

Client Name	ILI Cato Ltd.
Site Name	Cato, Aughtertool
Drawing Reference	COG842/HIA/002/c
Date	24/02/26

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VP1 Photo looking south, over southern most field, in crop



VP2 Photo looking west over agricultural track with gorse and scrub, with topography rising



VP3 View over agricultural field northwest towards turbines beyond the evaluation site



VP4 View towards north/northwestern fields of evaluation site and beyond



VP5 Drone photo of view into collapsed hilltop copse on southwestern edge of site



VP6 View looking west/southwest into area of Ancient Woodland beyond are of evaluation



VP7 Photo looking northeast across far edge of field in evaluation area to building and turbines beyond



VP8 Photo showing stone bridge at edge of agricultural field - not accessible due to fencing



VP9 Wooden footbridge, appears to be constructed of repurposed railway sleepers



VP10 Railway bridge looking east, illustrating drop in land levels



VP11 Photo looking to Camilla: Castle in the north



VP12 Approximately 7m high section of wall remaining upright at Camilla: Castle



VP13 Photo looking northeast, toward Camilla BESS and windfarm beyond



VP14 Drone photo illustrating both Camilla: Castle and Camilla: Building



VP15 Photo of Camilla: Building looking northwest



VP16 Drone photo of Camilla: Building



VP17a Southern section of Camilla: Building, illustrating loss of roof and general deterioration of condition



VP17b Northern section of Camilla: Building, showing general poor condition, in particular the corrugated iron roof



VP17c Camilla: Building, middle section which appears in occasional use to house livestock



VP18 Camilla: Castle remains looking south



VP19 Drone photo of Camilla BESS site



VP20 Camilla BESS looking east



VP21 Recent pipe excavations



VP22 No further access, possible animal tracks



VP23 View north across wet, marshy land



VP24 Dronachy Burn looking west towards route of old railway line



VP25 View north over the evaluation site, showing the ruins, Camilla BESS and Little Raith BESS and substation beyond



VP26 View northeast, trees illustrating the former route of the railway, Dronachy Burn and turbines beyond



VP27 Photo northwest over the site, showing the ploughed and wet land and windfarm in the distance

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planning and environmental expertise



Fife HER ID	NRHE ID	HER Name	Alternative Name	Classification	Grid Reference
MFF4043	52987	Camilla	Hallyards	Castle	NT 2115 9137
Map Sheet: NT29SW Ruins of Camilla formerly Hallyards - OS 6" map, (1920) Hallyards Castle - Some fragments of walling and a few mounds rising within a ploughed field represent all that remains of Hallyards Castle, which has evidently been an extensive house of the 16th or 17th century, built round a courtyard measuring 123 by 87 feet over all. A somewhat less ruinous structure at the north east corner is possibly of later date. Part of a gable, still standing at the south east corner, indicates that here the building has been a vaulted ground floor and at least two upper floors, with a lean-to structure or 'to fall'. RCAHMS 1933. After the death of Philip Skene in 1788, the name of Hallyards was changed to Camilla. A H Millar 1895. The ruins of Camilla, formerly Hallyards, are as described by RCAHMS; they are now very fragmentary and overgrown. Visited by OS (W D J) 11 March 1959. Published on May 14th, 2010 13:59 Updated on February 28th, 2013 14:36 The site of Hallyards Castle, now also known as Camilla, may once have been a hunting seat of Malcolm Canmore, and was later owned by the Bishops of Dunkeld. It was the principle residence in the parish of Auchtertool. In 1539 it passes into more documented history, when it was granted by the Bishop of Dunkeld – at that time it was George Crichton, although some reports suggest it was a Bishop Brown – to Sir James Kirkcaldy of Grange (also written as Kirkaldie). Sir James was an influential individual, close to James V, and Lord High Treasurer of Scotland. James V visited Hallyards on the way to Falkland Palace following the defeat at Solway Moss in 1542. Sir James's son Sir William Kirkcaldy of Grange was an active participant in the murder of Cardinal David Beaton in 1546, and as such Sir James's lands at Hallyards were forfeited, and father and son sent into exile in France In 1550 the estates were returned to Sir James, and he died at Hallyards in 1556. Upon his father's death Hallyards Castle passed to Sir William, who returned to Scotland the same year having been pardoned for his involvement of Beaton's murder. After initially fighting against Mary Queen of Scots he eventually ended up allied with her, and as Governor of Edinburgh Castle he held it for the Queen, but was forced to surrender to the Regent Morton in 1573 and was hanged. The estates then passed to Sir John Boswell of Balmuto (whose seat was the nearby Balmuto Castle), and in 1617 to William Forbes of Craigievar. Following the marriage of William Forbes's daughter Barbara to Andrew Skene, the barony of Auchtertool (containing Hallyards Castle) was granted to Andrew Skene on the 18th of January 1628. Skene made Hallyards Castle his main residence, and by 1633, and probably earlier, Skene was styling himself Andrew Skene of Halyards. Andrew Skene was the son of Sir John Skene of Curriehill, the Lord Clerk Register and Lord of Session. Hallyards remained in the Skene family until 1715 when a John Skene was forced to sell the estates to the Charles Stuart, the 6th Earl of Moray, due to debts accrued by his father. The Earls of Moray changed the name of the castle to Camilla, but they were absentee landlords and it was only occupied occasionally during the 18th century. By 1793 they had apparently departed for good, and when a member of the Skene family visited in 1819 he found it in a poor state. In 1847 the majority of it was demolished. Stone from the castle may have been used to build the nearby stable block which has a 19th century appearance. The remains of the castle that exist today show that it was a sizeable property, with a tall section of the wall at the south-east corner indicating that it was at least three storeys in height. A sketch of the castle appears in William Skene's "Memorials of the family of Skene of Skene" shows two tall corner towers joined by a central block. There was a vaulted ground floor, with two or three storeys above. Today's remains are thought to date mainly from the 16th and 17th centuries but may have included the fabric of an older building. A carved crest over one of the windows in the central block carried the date 1672. Projecting from the two wings of the castle was a courtyard wall, which enclosed an area measuring around 38 by 27 metres. While most of the stonework has now gone, the plot is still in existence but very overgrown. As well as the tall thin column of masonry at the south-east corner, there is a more substantial section of wall at the north-east corner, leaning at a considerable angle. The branch of the Skene family known as Skene of Halyards associated with Hallyards Castle in Auchtertool, Fife, should not be confused with a second branch also styled Skene of Halyards, but associated with Hallyards Castle in Kirkliston, Midlothian. Interestingly both branches appear to have been started by sons of Sir John Skene. The earliest reference to the Fife one seems to be 1539, while the earliest mention of the Midlothian Hallyards is 1579, so it is unclear which is the older name. See more at: http://www.stravaiging.com/history/castle/hallyards-castle-fife#sthash.1dJFIQVR.dpuf The house was largely demolished in 1847. Liscoe 06/12/16					

NATIONAL RECORD OF THE HISTORIC ENVIRONMENT (NHRE)

Fife HER ID	NRHE ID	HER Name	Alternative Name	Classification	Grid Reference
MFF4058	139237	Camilla	Cottage Row	Building	NT 21099 91340
Site recorded as part of a desk-based assessment and field inspection conducted in connection with an environmental assessment for proposed works on power lines between Dunfermline and Kirkcaldy. Full details of the methods and results of this exercise are in a report, a copy of which will be deposited in the NMRS. NT 2109 9133 Settlement (unnamed). Sponsor: Gillespies on behalf of Scottish Power plc. A J Dunwell and B Finlayson 1997 A roofed building is depicted on the 1st edition of the OS 6-inch map (Fife and Kinross 1856, sheet 36) and shown on the current edition of the OS 1: 10,560 map (1966) Information from RCAHMS (KC) 1999					

Fife HER ID	NRHE ID	HER Name	Alternative Name	Classification	Grid Reference
MFF9850		Auchtertool		Railway	NT 2221 9111
Branch					
Location - Administrative Areas Civil Parish: FORGAN Unitary Authority: FIFE Monument/Component Types RAILWAY (Undated)					

Appendix 6.1

Designated Assets: Impact Assessment

Label	HES Ref.	Listed Building Name	Category	Distance (km)	Anticipated Impact
1	LB3673	11 The Maltings, Auchtertool	C	0.12	Setting
2	LB13003	West Balbairdie Farm Lodge	C	1.71	Setting
3	LB43660	Little Raith	B	0.37	Setting
4	LB46873	Lambert's Mill Bridge	C	1.76	Setting

Label	HES Ref.	Garden and Designed Landscape Name	Distance (km)	Anticipated Impact
Named	GDL00323	Raith Park And Beveridge Park	1.53	Setting

- Development Site
- Area Excluded From Development
- Zone of Theoretical Visibility
- Category B Listed Building
- Category C Listed Building
- Garden and Designed Landscape

Map Details

Map illustrating Designated Heritage Assets within a 2km buffer of the proposed development, overlain with the Zone of Theoretical Visibility which has been calculated using the highest points of Construction Areas (35m and 12m). These assets are identified as at the most risk of impact as a result of the proposed development.

The ZTV is computer generated in ReSoft Windfarm V5 using OS landform terrain 50 data and takes into account natural and built features within the landscape. All barriers are considered by the software to obscure the development entirely with no demonstration of filtered views or partial screening. The earth's curvature and atmospheric refraction are included. Viewer height above the ground is 1.7m.

Scale: 1:20,000 @ A3

0

0.25

0.5

km

Client Name

Site Name

Drawing Reference

Date

ILI Cato Ltd.

Cato Data Centre

COG842/HIA/003/c

06/03/26

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Appendix 6.2

Non-Designated Assets: Impact Assessment

-  Development Site
-  Area Excluded From Development
-  HER Asset
-  Auchtertool Branch - Railway

Map Details
Map illustrates Non-Designated Heritage Assets identified at most risk of impact in relation to the proposed development.



Scale: 1:5,000 @ A3



0 100 200 m

Client Name Illi Cato Ltd.
Site Name Cato Data Centre
Drawing Reference COG842/HIA/004/c
Date 06/03/26

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Label	NRHE ID	Fife HER ID	HER Entry Name	Alternative Name	Type	Anticipated Impact
A	52987	MFF4043	Camilla	Hallyards	Castle (Medieval)	Physical
B	139237	MFF4058	Camilla	Cottage Row	Building (Period Unassigned)	Physical
Named		MFF9850	Auchtertool Branch - Railway		Railway (Undated)	Setting/Physical

