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**Cultural
Heritage and
Archaeology**

8. Cultural Heritage and Archaeology

8.1 Introduction

732. This chapter of the EIAR assesses the likely significant effects of the Proposed Development on archaeology and cultural heritage. Cultural heritage in this context refers to the above and below-ground archaeological resource, built heritage, the historic landscape, and any other elements which may contribute to the historical and cultural heritage of the area.
733. The aim of this chapter is to provide:
- A summary of the baseline conditions of the Proposed Development site;
 - An assessment of the likely significant effects of the Proposed Development on cultural heritage; and
 - Recommendations for additional mitigation measures as required.
734. The term the ‘Proposed Development’ refers to the proposed works including the substation, temporary compounds, temporary and permanent access tracks, drainage and landscaping as defined in Chapter 4. The term ‘Site’ refers to the entire area within the application boundary shown in Figure 4.1.
735. The chapter draws on the following technical figures and appendices:
- Figure 8.1: Heritage Assets within the 1 km Study Area adopted for the baseline study;
 - Figure 8.2: Designated Assets within 1 km Study Area adopted for setting impacts;
 - Appendix 8.1 – Gazetteer of designated and non-designated assets;
 - Appendix 8.2 – Site Photographs;
736. External sources used to inform the baseline and appraisal are referenced appropriately.

8.2 Legislation and Planning Policy Context

Legislation

737. The assessment was conducted within the context of the legislative and planning framework designed to protect and conserve heritage resources. There are several statutory instruments and policies governing the approach to cultural heritage. The main pieces of legislation are:
- Town and Country Planning (Scotland) Act 1997²⁷;
 - The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013²⁸;

²⁷ Scottish Government (1997) *Town and Country Planning Act*, Edinburgh: Scottish Government.

²⁸ Scottish Government (2013) *The Town and Country Planning (Development Management Procedure) (Scotland) Regulations*, Edinburgh: Scottish Government.

- Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997²⁹;
- Ancient Monuments and Archaeological Areas Act 1979³⁰; and
- Historic Environment Scotland Act 2014³¹.

National Planning Policy

738. The principal elements of national policy and guidance comprise:
- NPF4³²;
 - Historic Environment Policy for Scotland (“HEPS”)³³;
 - Our Past, Our Future - The Strategy for Scotland’s Historic environment³⁴;
 - Planning Advice Note (“PAN”) 2/2011 – Planning and Archaeology³⁵;
 - PAN 71 – Conservation Area Management³⁶; and
 - The Historic Environment Scotland (HES) ‘Managing Change in the Historic Environment’ series of guidance notes (particularly *Managing Change in the Historic Environment: Setting*³⁷).
739. NPF4 represents the latest national planning policy document relevant to the Proposed Development. Policy 7 relates to cultural heritage and key elements of the policy include ‘point c’ and ‘point h’ which relates to listed buildings and scheduled monuments respectively and state:
- “c) Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.”
- “h) Development proposals affecting scheduled monuments will only be supported where:
- direct impacts on the scheduled monument are avoided;
 - significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or
 - exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.”
740. Impacts on non-designated assets are covered by ‘point o’:
- “o) Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts.

²⁹ Scottish Government (1997) *Planning (Listed Buildings and Conservation Areas) (Scotland) Act*, Edinburgh: Scottish Government.

³⁰ UK Government (1979) *Ancient Monuments and Archaeological Areas Act*, Edinburgh: HMSO.

³¹ Historic Environment Scotland (2014) *Historic Environment Scotland Act*, Edinburgh: HMSO.

³² Scottish Government (2023) *National Planning Framework 4*, Edinburgh: Scottish Government.

³³ Historic Scotland (2019) *Historic Environment Policy for Scotland*, Edinburgh: Historic Environment Scotland.

³⁴ Historic Environment Scotland (2023) *Our Past, Our Future: The Strategy for Scotland’s Historic Environment*, Edinburgh: Historic Environment Scotland.

³⁵ Scottish Government (2011) *Planning Advice Note 2/11 – Planning and Archaeology*, Edinburgh: Scottish Government.

³⁶ Scottish Government (2004) *Planning Advice Note 71 – Conservation Area Management*, Edinburgh: Scottish Government.

³⁷ Historic Environment Scotland (2016) *Managing Change in the Historic Environment*, Edinburgh: Historic Environment Scotland.

Historic buildings may also have archaeological significance which is not understood and may require assessment.

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

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

741. Policy 11 relates to energy and as such is also relevant to the Proposed Development. ‘Point e’ relates to impacts resulting from renewable developments and states:

“e) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

- ii – significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable; ... [and]*
- vii – impacts on historic environment”*

742. Our Place in Time was superseded by a new strategy entitled ‘Our Past, Our Future’ which was released in June 2023³⁸. The three main priorities identified in this document are:

- Priority 1: Delivering the transition to net zero;
- Priority 2: Empowering resilient and inclusive communities and places; and
- Priority 3: Building a wellbeing economy.

Local Planning Policy

743. Both the local plans for Fife and Clackmannanshire are currently being updated in light of the adoption of NPF4, however, until the new plans have been developed and adopted the existing plans remain appropriate.

744. Policy 14 of the Fife Plan, adopted in 2017, covers the ‘Built and Historic Environment’³⁹. This notes that all developments will have to take into consideration the care and protection of the historic environment, whether assets are designated or non-designated, and states that a suitable assessment should be undertaken. This is supported by Appendix C of the Supplementary Guidance which covers the Historic Environment⁴⁰.

745. Policies relevant to the Proposed Development from the Clackmannanshire Local Development Plan, adopted in 2015, consist of EA19 which protects scheduled monuments (both physically as well as their setting), EA20 which protects non-designated assets, EA22 which covers listed buildings, and EA23 which protects Conservation Areas⁴¹.

³⁸ Historic Environment Scotland (2023) *Our Past, Our Future: The Strategy for Scotland’s Historic Environment*, Edinburgh: Historic Environment Scotland.

³⁹ Fife Council (2017) *Fife Local Development Plan (FIFEplan)*, [Online] available from [Keystone Stakeholder Engagement](#).

⁴⁰ Fife Council (2017) *Making Fife’s Places, Supplementary Guidance: Appendix C – Historic Environment* [Online] available from [Making-Fifes-Places-Supplementary-Guidance-Appendices-A-F.pdf](#).

⁴¹ Clackmannanshire Council (2015) *Clackmannanshire Local Development Plan*, Clackmannanshire Council

Guidance

746. The assessment has been undertaken following the Chartered Institute for Archaeologists (CIfA) Standards and Guidance for Historic Environment Desk-Based Assessment⁴².

8.3 Assessment Methods

Scope of the Assessment

747. As part of this assessment, a search of relevant data has been undertaken with material collected for a Study Area of 1km from the Site to inform the baseline. This distance was deemed suitable based on the mixed land use in the area, as well as the Site being located in an area of reclaimed land, and the extent of visibility of the Proposed Development. These sources include:
- PastMap⁴³;
 - Historic Environment Scotland (HES) website including Canmore⁴⁴;
 - Historic mapping on the National Library of Scotland website⁴⁵;
 - Clackmannanshire Historic Environment Record (HER) (managed by Stirling Council); and
 - Other available online sources.
748. At the time of writing the County of Fife, in which the Site is located, does not have a publicly available Historic Environment Record (HER), and as such Canmore was accessed for information relating to previously recorded non-designated assets within the Fife area. The Clackmannanshire HER was consulted for the section of the Study Area that falls within Clackmannanshire.
749. All assets are listed in the gazetteers provided in Appendix 8.1 – Gazetteer, these are also shown on Figure 8.1. Assets are referred to in the text by their HES number, with the SM prefix signifying scheduled monuments, while the LB prefix signifies a listed building. Non-designated assets from the Canmore database have no prefix, while assets recorded as part of the walkover survey and documentary research has the prefix ‘AECOM’.

Assessment of Impacts

750. The impact assessment considers any impacts to the value (significance) of an asset, either physically or through changes to its setting.
751. The value (significance) of a heritage asset is determined by professional judgement, guided but not limited to any designated status the asset may hold. The value of an asset is also judged upon a number of different factors including the special characteristics the assets might hold which can include evidential, historical, aesthetic, communal, archaeological, artistic and architectural interests. This value of a heritage asset is assessed primarily in accordance with the guidance set out in NPF4 and the Historic Environment Policy for Scotland (HESP)⁴⁶. The value (significance) is defined by the sum of its heritage interests. Taking these criteria into account, each identified heritage asset can be assigned a level of value (significance) in accordance with a five-point scale as set out in Table 8.1.

⁴² Chartered Institute for Archaeologists (2020). Standard and guidance for historic environment desk-based assessment. [Online] available from: https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA_4.pdf

⁴³ PastMap [Online] available from: <https://www.pastmap.org.uk/>

⁴⁴ Historic Environment Scotland. [Online] available from: www.historicenvironment.scot

⁴⁵ National Library of Scotland [Online] available from: <https://maps.nls.uk/>

⁴⁶ Historic Scotland (2019) *Historic Environment Policy for Scotland*, Edinburgh: Historic Environment Scotland.

Table 8.1 Heritage Value (significance) Criteria

Value	Examples
Very High	<ul style="list-style-type: none"> World Heritage Sites (WHS); Assets of acknowledged international importance; and Historic landscapes of international sensitivity, whether designated or not.
High	<ul style="list-style-type: none"> Scheduled Monuments; Non-designated sites/features of schedulable quality and national importance; Category A Listed Buildings; Gardens and landscape on the Inventory of Designed Landscapes of outstanding archaeological, architectural or historic interest; and Registered Battlefields.
Medium	<ul style="list-style-type: none"> Sites/features that contribute to regional research objectives; Category B and C Listed Buildings; Locally listed or non-designated buildings that can be shown to have special interest in their fabric or historical association; Conservation areas; Historic townscapes or built-up areas with historic integrity in their buildings, or built settings; and Non-designated historic landscapes of regional sensitivity.
Low	<ul style="list-style-type: none"> Non-designated sites/features of local importance; Non-designated buildings of modest quality in their fabric or historical association; and Historic landscapes whose sensitivity is limited by poor preservation and/or poor survival of contextual associations or with specific and substantial importance to local interest groups.
Negligible	<ul style="list-style-type: none"> Assets with very little or no surviving archaeological interest; Buildings of no architectural or historical note; buildings of an intrusive character; and Landscapes with little or no significant historical interest.

752. Having identified the heritage value (significance) of the heritage asset, the next stage in the appraisal will be to identify the level and degree of impact to an asset arising from the Proposed Development. Impacts may arise during construction or operation and can be temporary or permanent. Impacts can occur to the physical fabric of the asset or affect its setting.

753. When professional judgement is considered, some sites may not fit into the specified category in this table. Each heritage asset will be assessed on an individual basis and take account of regional variations and their individual qualities.
754. The level and degree of impact (magnitude of impact) will be assigned with reference to a four-point scale as set out in Table 8.2. In respect of cultural heritage, an assessment of the level and magnitude of impact is made in consideration of any scheme design mitigation (embedded mitigation). Where no change to the significance of the asset is caused, this will be stated and the asset will not be taken further.

Table 8.2 Magnitude of Impact Criteria

Magnitude of change	Examples
High	Total removal or alteration of an asset, such that the physical resource and /or the key components of its setting are totally altered resulting in complete change to an asset’s setting and loss of heritage value of the asset.
Medium	Partial alteration of an asset, such that the heritage value of the resource and/or the key components of its setting are clearly modified.
Low	Minor alteration of an asset, such that the components of its setting are noticeably different, but the physical characteristics are not affected and the impact does not result in a noticeable loss of heritage value.
Negligible	Slight changes to historic elements that hardly affect the setting of an asset and do not result in any loss of value.

755. An assessment of the level of significant effect, having taken into consideration any embedded mitigation, will be determined by cross-referencing between the heritage value (significance) of the asset (Table 8.1) and the magnitude of impact (Table 8.2). The resultant level of effect (Table 8.3) can be negligible, minor, moderate or major and neutral, adverse or beneficial.

Table 8.3 Assessment of Significance

Magnitude	Sensitivity or Value of Receptors				
	Very High	High	Medium	Low	Negligible
High	Major	Major	Moderate	Moderate	Minor
Medium	Major	Moderate	Moderate	Minor	Negligible
Low	Moderate	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Minor	Negligible	Negligible	Negligible

756. Effects of major or moderate significance are considered to be significant in EIA terms.
757. An assessment of the likely significance of effect will be made both prior to and following the implementation of specific mitigation measures to identify the residual effects. This first

highlights where mitigation may be appropriate, and then demonstrates the effectiveness of that mitigation, providing a framework for the assessment of the likely significance of effect which takes specific mitigation measures into consideration

758. All archaeological work will be undertaken in line with guidance published by the Chartered Institute for Archaeologists⁴⁷.

Consultation

759. Initial consultation was undertaken with relevant stakeholders as part of the scoping process, with a scoping response received from HES in June 2024. This acknowledged that works to the existing OHL required to connect to the Proposed Development formed part of a separate application, and also acknowledged that a separate battery storage development had been approved for land to the west of the Proposed Development. While HES confirmed that the Proposed Development would not result in physical impacts on designated assets, they did raise the potential for impacts on the setting of designated assets, and in particular the possibility of impacts on the setting of the former Kennetpans Distillery (SM5012) and Tulliallan Castle (SM736), both of which are scheduled monuments, as well as Tulliallan Garden and Designed Landscape (GDL00379).
760. A scoping response was received from the Fife Council Archaeological Advisor (FCAA) in June 2024 which confirmed no previous heritage assets had been recorded within the Proposed Development, but noted that any assessment should assess the potential for buried archaeological remains to exist on site. The FCAA also noted that the assessment should include a strategy for testing the presence/absence of buried archaeology on site, as well as develop a strategy to mitigate any potential physical impacts on previously unrecorded archaeological deposits. Finally, it noted the need to undertake an assessment to examine the potential for permanent impacts on the setting of heritage assets in the surrounding area including and Tulliallan Castle (SM736), Tulliallan Garden and Designed Landscape (GDL00379) and Kennetpans Distillery (SM5012).
761. A scoping response was received from the Fife Council Built Heritage Advisor (FCBHA) which advised that the substation would be unlikely to have a material impact on any heritage assets. The response highlighted the potential for setting impacts on heritage assets but noted that these are already impacts by infrastructure including the existing overhead lines. The response highlighted designated heritage assets to be considered including listed buildings (Kilbagie House (LB1955) and Kilbagie Mill House (LB1957)) as well as non-designated assets comprising farmhouses, steadings and cottages to the west of the site.
762. Further consultation was undertaken with the FCAA on the 22nd January 2025 via Teams, when a project update was provided. This included changes to the application boundary and the proposed works, as well as brief overview of the review of the baseline data collection. The FCAA provided additional information regarding the archaeological potential of the Site based on recent evaluation excavations undertaken for a development immediately to the west of the Proposed Development which did not identify any archaeological remains⁴⁸. Due to the low archaeological potential of the Site, it was agreed with the FCAA that archaeological evaluation trenching would be required post-determination, and the results of this would determine what, if any, mitigation would be required.
763. The very western limits of the Site fall within Clackmannanshire, and as a result consultation was undertaken with the Stirling Council Archaeologist who represents Clackmannanshire.

⁴⁷ Chartered Institute for Archaeologists (2020) *Standard and Guidance for Historic Environment Desk-Based Assessment*, Reading: CiFA.

⁴⁸ GUARD Archaeology (2023) *Kincardine BESS, Kincardine Grid Services Complex, Fife, Data Structure Report – Project 6340*, unpublished report for Prospect Archaeology.

As a result, consultation was undertaken in January 2025, with an HER data search undertaken. This consultation confirmed that elements of the Site that fall within Clackmannanshire will not require mitigation as the area has been previously disturbed by the construction of the A876, removing all archaeological remains. As such, physical impacts are not predicted in the Clackmannanshire area.

8.4 Baseline Conditions

764. This chapter reports the assessment of the likely effects on sites of archaeological and cultural heritage interest resulting from the Proposed Development. Baseline data was collected for the Site as well as a 1km Study Area in order to assess the archaeological potential of the Site, as well as examine the potential for impacts, both physical and through changes to setting.

Land use and Topography

765. The Site, which is centred on NGR NS 92497 89395, is located approximately 1km north of the River Forth, and 1.2km northwest of the settlement of Kincardine (Figure 1). The vast majority of the Site is within the county of Fife, with only limited areas (i.e. the tie-in to the existing A876 road) falling within the County of Clackmannanshire. It is bordered to the north by the Kilbagie complex, a former distillery site now used as a haulage yard, while woodland borders the Site to the south. The majority of the western boundary of the Site borders land with approval for a BESS Site, with a spur providing a link from the Site to the A876. An operational railway forms the Site's eastern boundary.
766. The solid geology consists of sedimentary rock cycles of the Middle and Lower Scottish Coal Measures Formation laid down during the Carboniferous period, while the drift geology is largely raised tidal flats/alluvium (silts and clays) formed during the Holocene⁴⁹. A rapid review of historic borehole data suggests that this alluvium is between 5m and 15m thick before bottoming onto the carboniferous sedimentary geology⁵⁰.
767. The majority of the Site is located between 5m and 10m above sea level, and is currently used for arable agriculture. The exception is the western limits of the Site which are occupied by the existing A876 and a balancing pond, and the southern element of the Site which is occupied by the existing Hawkhill Road.

Designated Assets

768. There are no designated assets within the Site, however, a total of 112 designated assets were identified within the 1km Study Area consisting of two scheduled monuments, 109 listed buildings, and a single Garden and Designed Landscape.
769. The scheduled monuments include Tulliallan Castle located in an area of woodland approximately 100m south of the Site (SM736), with the second scheduled monument being elements of the Kennetpans Distillery site located approximately 800m southwest of the Site on the banks of the River Forth (SM5012).
770. The listed buildings include one Category A listed building, 41 Category B listed buildings, and 67 Category C listed buildings. The vast majority of the listed buildings are located in the town of Kincardine to the southeast of the Site, which is also a Conservation Area. These are largely post-medieval buildings associated with the development of the town, and include commercial properties, churches, and residential buildings.

⁴⁹ BGS Viewer: [BGS Geology Viewer \(BETA\)](#), accessed 5th August 2024

⁵⁰ BGS GeoIndex: [GeoIndex - British Geological Survey](#), accessed 14th January 2025

771. The single Category A listed building is Tulliallan Castle to the north of Kincardine (LB16585), and this building is within the Tulliallan Garden and Designed Landscape (GDL00379). Tulliallan Castle is now the Police Training Centre, and as a result the main building as well as the surrounding parkland has undergone significant changes including the construction of new buildings, sports facilities, and supporting infrastructure. However, the parkland does still retain a number of Category B listed buildings including the walled garden (LB49037), a dovecot (LB17143), and the former lodge (LB16587).
772. The remaining listed buildings are located throughout the Study Area and include a group of four cottages grouped under a single asset number (LB1954) to the southwest of the Site at Kennetpans. These are Category C listed, and were associated with the former Kennetpans Distillery which is itself scheduled. A further two listed buildings are located to the north of the Site at Kilbagie. These consist of the Category B listed Kilbagie House (LB1955), and the Category B listed Kilbagie Mill (LB1957), and both were associated with the former Kilbagie Distillery Complex. Both Kilbagie House and Kilbagie Mill are abandoned and in a poor state of repair.

Non-designated Assets

773. A total of 182 non-designated assets were recorded within 1km of the Site on Canmore and the Clackmannanshire Historic Environment Record managed by Stirlingshire Council (see Appendix 8.1: Gazetteers and Figure 8.1: Known Heritage Assets), with a further three assets recorded as part of the desk-based assessment. The majority of these assets date to the post-medieval period and are located in the settlements or relate to agricultural activities in the landscape through which the Site passes. A limited number are related to settlement activity and development in of the few small settlements that lie close to the site.
774. Previously recorded heritage assets in the 1km Study Area are discussed by period below.
Prehistoric and Roman (40,000BC to AD400)⁵¹
775. Previously recorded assets in the Study Area represent human activity from the prehistoric period onwards, although assets dating to the prehistoric period are limited with only seven non-designated assets identified. These include two areas of possible burial mounds/cists (74782; 48113), as well as settlement activity dating to the Neolithic and Bronze Age (347834; 5510.01), and potential shell middens (3316.01; 3316.02; 3316.03). The Study Area on the north side of the River Forth covers a landscape rich in natural resources including the river, as well as woodland and fertile soils which have been exploited from at least the Mesolithic period, although most of the prehistoric evidence is on the slightly higher ground to the east and north of the Site. This includes the discovery of Neolithic and Bronze Age settlement activity on the higher ground to the north which was identified during the construction of the A876 (347834). The Site is focused on lower lying land which was likely unusable for parts of the prehistoric period due to higher sea level/river level in the area.
776. Evidence suggests that the Site was within the course of the River Forth during the Neolithic and Bronze Age, and only became inter-tidal in the later Bronze Age, and finally fully useable in the Iron Age when the river started to largely resemble its current form/course. As such, prehistoric activity would have been largely limited to the higher ground to the north and east, with the possibly of activity within the Site limited to the later prehistoric periods, although no remains have been encountered. However, some evidence of seasonal exploitation has been

⁵¹ Due to the varied nature of the Scottish landscape, and the resulting variations in settlement/land use, there is no agreed chronology at a national level. As such, the dates that have been assigned to the various periods for the baseline study are those set out in the Regional Archaeological Research Framework for North East Scotland which was produced as part of the Scottish Archaeological Research Framework (ScARF) (Regional | The Scottish Archaeological Research Framework (scarf.scot)

recorded with possible Mesolithic/Neolithic shell middens recorded to the west of the Site (3316.01; 3316.02).

777. There is also no previously recorded evidence of Roman activity within the Study Area. While the landscape of the Study Area did fall within the extents of Roman rule during periods of time, such as the advance north when the Gask Ridge forts were established, the main focus of Roman occupation was along the line of the Antonine Wall was approximately 10km to the south.

Early-Medieval (AD400 to AD900)

778. There are no assets dating to the early medieval period within the Study Area, although evidence for activity during this period has been recorded in the wider landscape. During the early medieval period the Study Area, as well as the Fife, Perth and Kinross and the wider Angus, and Aberdeenshire areas, fell within the Kingdom of the Picts, and while clear archaeological evidence for early medieval settlement activity is limited, a number of Pictish carved stones have been recorded in Fife⁵².
779. Placename evidence has also suggested early medieval settlement activity within the area during this period, and Pictish placename elements including *carden*, *aber*, and *pren*, are recorded throughout Fife with examples in the Study Area including Kincardine to the southeast of the Site⁵³. Documentary sources also recorded a ferry operating in the area of Alloa, some 3km to the northwest of the Study Area, as early as the 10th century⁵⁴, while Clackmannan is also thought to have been well established by the early medieval period.
780. This evidence would suggest that the Study Area and its surroundings were relatively well settled during this period, with the River Forth representing a key communications link, although the Site does not appear to have been subject to settlement activity and was potentially agricultural land associated with the settlement of Kincardine.

Medieval (AD900 to AD1600)

781. While evidence for activity dating to the medieval period is limited within the Study Area, a number of assets have been recorded that would suggest the settlement continued to develop throughout this period. Assets dating to the medieval period include the scheduled Tulliallan Castle to the south of the Site (SM736), and two non-designated sites. These are both linked to possible churches and comprise Kilbagie Chapel to the north of the Site (1332), and Chapel Hill in Kincardine to the south (48120). While traces of the latter site have been recorded through excavation, the site of Kilbagie Chapel is noted by FCAA as an error and is a misinterpretation of the place name⁵⁵.
782. It would appear that the main focus of settlement during the medieval period was to the southeast of the Site around Tulliallan Castle and Kincardine, with the castle recorded from at least the early 14th century⁵⁶, and the Kincardine placename suggesting an early medieval origin. Documentary evidence would also suggest that salt production in the southern limits of the Study Area, along the shore of the River Forth, was well established by the later medieval period, with salt pans recorded from Kennet Pans east towards Kincardine and Culross⁵⁷. The almost industrial scale of the salt production industry in the 16th century was supported through the discovery of coal in the area, with a number of mines opened to provide coal to fuel the salt pans. However, the Site was probably too far away from the River

⁵² Proudfoot, E. (2000) 'The Picts and the Early Medieval Period' in Omand, D. (ed.) *The Fife Book*, Edinburgh: Birlinn.

⁵³ Nicolaisen, W. F. H. (2001) *Scottish Place-Names – Their Study and Significance: New Edition*, Edinburgh: Birlinn Limited.

⁵⁴ Smith, R. (2001) *The Making of Scotland*, Edinburgh: Canongate Books Limited

⁵⁵ FCAA, pers. comm. 23rd January 2025.

⁵⁶ Smith, R. (2001) *The Making of Scotland*, Edinburgh: Canongate Books Limited.

⁵⁷ Brown, R. L. (2000) 'From the War of Independence to the Union of the Crowns' in Omand, D. (ed.) *The Fife Book*, Edinburgh:

Forth to have been used for salt production and it is assumed it remained as agricultural land.

Post-Medieval (AD1600 to AD1900)

783. The post-medieval period represents the most visible period in terms of previously recorded heritage assets, with 111 designated assets and 153 non-designated assets recorded within the Study Area. The majority of these are associated with the continued development and expansion of the settlements that are located on the outer limits of the Study Area including the town of Kincardine to the southeast, and the village of Kennet which developed in the later post-medieval period to the northwest.
784. Historic cartographic sources of the area dating from the 17th century are largely limited to County level surveys of limited detail, however, a number of these show features that can be traced in the modern landscape. For example, the Blaeu survey of 1662-65 shows Tullyallan Castle (SM736) and Kennets⁵⁸, while the Adair Survey published in 1681 shows Kennet Pans, *Kincardin*, *Tyllyallan K* and *Tyllyallan*. The latter site is assumed to represent Tulliallan Castle, while ‘*Tyllyallan K*’ would appear to relate to the former church on Castle Hill (48120)⁵⁹.
785. The first detailed survey of the area is the Roy survey undertaken between 1747 and 1752, and this shows the Site as being used for arable agriculture, with Tulliallan Castle (SM736) to the south surrounding by woodland which encloses a small area of parkland. The survey also shows Kincardine as a settlement of some size, as well as a number of small settlements or farmsteads that can be traced in the contemporary landscape. These include Craigton to the west and Kennet Pans to the southwest. Other sites noted include *Garblet Place* (48314) which now lies under the north end of the A876, and *Westcarse* which appears to be under the modern power station to the south.
786. The Roy Survey also shows an area of intertidal mud flats to the south of Tulliallan Castle named *Tullyallan Pans* suggesting salt production may have been taking place during this period. Documentary sources from the late 18th century state that in the late 17th and early 18th century there were over 35 salt pans in the Parish of Tulliallan, however the vast majority of these were noted to have been in ruins by 1794, with many having had their foundations removed⁶⁰. The same account also notes the importance of coal in the parish during the early 18th century, with coal being used in the salt pans and also exported as far as Dundee by river and sea, although the main colliery is reported to have fallen out of use by 1794⁶¹. Later mid-19th century mapping of the area shows an ‘old shaft’ within the Site (AECOM003), and it is possible that this is associated with the 17th and early 18th century mining that took place in the area.
787. While the mid to late 18th century marked the end of mining and salt production in the area, distilling was becoming a major industry. The first distillery in the Study Area was opened at Kennet Pans in the early 1770s (SM5012) and this was followed by a second distillery opened at Kilbagie to the north of the Site in the late 1770s (48118). The two distilleries reached their peak of production in the 1880s during which time they were connected by a canal and subsequently a waggon way, and much of the arable land around the distilleries was used for growing grain/barley during this time⁶². The use of the land surrounding the two distilleries for

⁵⁸ Viewed at [View map: Pont, Timothy, 1560?-1614? ; Blaeu, Joan, 1596-1673, Sterlinensis Præfectvra - Blaeu Atlas Maior, 1662 \(nls.uk\)](#) accessed 15th August 2024

⁵⁹ Viewed at [View map: Adair, John, ca. 1650-1722, A Mapp of Clackmanan Shire. A map of Clackmannanshire. - Maps by John Adair \(nls.uk\)](#) accessed 15th August 2024.

⁶⁰ Simson, D. (1794) ‘The Parish of Tulliallan’ in Sinclair, J. (ed.) *The Statistical account of Scotland Volume 11*, Edinburgh: William Creech

⁶¹ *Ibid.*

⁶² Ramage, H. (n.d.) *Kennetpans Distillery: The Site and the Wider Landscape*, Unpublished Thesis for a MSc, Stirling University

growing grain/barley for whisky production would suggest that the land within the Site was used for arable during this period.

788. By the time the Stobie survey was published in 1783 Tulliallan Castle (SM736) appears to be depicted as a ruin with a woodland belt to the north, while a number of farmsteads and other features that still survive in the Study Area have been established and are depicted⁶³. These include Broomknows (AECOM001) and Dalguamie (AECOM002) to the east, as well as Kilbagie (LB1955) and Garlet (48314) to the north. The scale of the survey means that the Site is not shown in great detail, but it appears to remain undeveloped and is assumed to be agricultural land, and while the distillery is not named as such, it is assumed that ‘Kilbagie’ to the north represents the distillery.
789. In 1788 the Stein family, who owned a number of distilleries including Kennet Pans and Kilbagie, were declared bankrupt and both distilleries were closed. By 1795 they had reopened and while they continued to grow in the first half of the 19th century, they were to close by the 1860s when the Kilbagie Distillery was converted to a chemical manure plant. The Second Statistical Account of 1845 notes that the agricultural land within the Parish of Tulliallan had been much improved in the early 19th century, and it is assumed that the Site remained in use as arable during this period⁶⁴.
790. During the first half of the 19th century the main focus of settlement development remained Kincardine to the southeast. Tulliallan Castle (SM736) was also completely abandoned, with a ‘new’ Tulliallan Castle built to the east (LB16585) with associated designed landscape (GDL00379).
791. The first detailed mapping of the Site dates to 1866 when the Ordnance Survey published the First Edition survey of the area. This depicts the Site as fields, with some of the boundaries recorded still visible on the contemporary landscape⁶⁵. This situation remains the same on later mapping, with the development of the former distillery site at Kilbagie focused to land outside of the Site to the north, and the land of the Site used for agricultural purposes.

Modern (AD1900 to Present)

792. Only a limited number of assets dating to the modern period have been recorded in the Study Area, and these are largely focused around Kincardine and are linked to the development of the settlement. Other assets dating to the modern period include a grouping of features to the south of the Site which represent the former Kincardine Power Station. These include coal stores (267766), coal hoppers (68086), the turbine hall (276991), and firefighting pumphouse (277534), as well as other associated features (277533; 277095; 277101; 277102; 277103; 259537; 123074). The power station went into operation in 1958 and was closed in 1997 with most structures demolished, however, the area has been partially redeveloped with a substation now covering part of the former power station.
793. The landscape of the Site remained in agricultural use throughout the 20th century, and this remains the primary land use.

Site Visit and Setting Assessment

794. A site reconnaissance visit was undertaken on the 1st July 2024 when the area around the Site was visited to assess the potential for impacts through change to the setting of assets.

⁶³ Viewed at [View map: Stobie, James, fl. 1775-1804, The counties of Perth and Clackmannan. - Counties of Scotland, 1580-1928](#) accessed 18th March 2025.

⁶⁴ Monilaws, GH. H. (1845) ‘The Parish of Tulliallan’ inannon (ed.) *The New Statistical Account of Scotland Volume 10*, Edinburgh: William Blackwood and Sons.

⁶⁵ First Edition Ordnance Survey Map, viewed at [View map: Ordnance Survey, OS six-inch to the mile, 1st ed., Perthshire, Sheet CXL - Ordnance Survey Six-inch 1st edition, Scotland, 1843-1882 \(nls.uk\)](#), accessed 19th August 2024

The visit found that views of the Proposed Development were very limited from the south, east, and north due to topography and extensive mature tree cover and woodland, as well as new infrastructure.

795. The most extensive views into the Site were from the west where the land is more open and flat, although these were partially blocked from the southwest due to the new flyover that carries a minor road over the new A876 bypass.
796. The most prominent features in the Site were the existing towers carrying the operational OHL, and these towers were very visible from the west, although well screened from the east and the A977 area.
797. While the Site was not visited due to access issues, views into the Site found it to be used for arable agriculture with no evidence of previously unrecorded assets visible.
798. A second site visit was undertaken on the 22nd September 2024 when Kennet Pans Distillery (SM5012) and Tulliallan Garden and Designed Landscape (GDL00379) were visited once further design information was available. This visit confirmed that there are no views of the Proposed Development from most areas of Tulliallan Garden and Designed Landscape (GDL00379), with the existing woodland, topography, and late 20th century buildings that form part of the police training collage providing screening. The open central areas of the designed landscape may have some limited views, although these are not thought to be extensive as only the very tops of the existing overhead line towers are visible, and these are considerably taller than the Proposed Development.
799. There were also no views from Tulliallan Castle (SM736) due to the woodland planting that surrounds the castle, although there were some limited views from Kennet Pans Distillery (SM5012).

Previous Archaeological Investigations

800. There have been no previous archaeological investigations within the Site, although a phase of evaluation trenching was undertaken on land immediately to the west of the Site as part of an approved BESS site. This did not identify any archaeological remains, and noted a low potential for previously unrecorded archaeological remains due to the area having been mudflats/intertidal for a significant period.
801. Other previous archaeological works in the Study Area have included investigations associated with the construction of the A876 which runs to the west of the Site⁶⁶. These works identified evidence of Neolithic and Bronze Age settlement at Meadowend Farm to the north of the site in a slightly elevated position (347834), as well as later remains dating to the medieval and post-medieval period around the former Garlet House site (48314).

Archaeological Potential

802. While evidence for human activity has been recorded within the Study Area from the prehistoric period onwards, the low-lying area covered by the Site was largely a marine environment and intertidal area. While changing sea-levels eventually saw the landscape of the Site become a terrestrial area, the land remained wet and boggy with activity focused on the higher ground. As a result, the potential for previously unrecorded assets dating to the prehistoric period is considered to be low.
803. Previously recorded assets dating to the early medieval and medieval period are also limited within the Study Area.

⁶⁶ Jones, E. (2006) 'Upper Forth Crossing, Clackmannanshire (Clackmannan Parish), Excavation', in *Discovery and Excavation in Scotland*, Volume 7, Pages 46-47.

Issues Scoped Out

804. Based on the design of the Proposed Development, the following potential impacts have been scoped out of further assessment:
- Physical impacts on designated assets; and
 - Physical impacts on previously recorded heritage assets.

8.5 Assessment of Effects, Mitigation and Residual Effects

805. The appraisal of the likely impacts resulting from the Proposed Development has been divided into the construction and operational phases. These are discussed below.

Construction Phase

806. The construction phase has the potential to result in the following impacts:
- Permanent physical impacts on previously unrecorded heritage assets due to construction of the substation and associated permanent elements;
 - Permanent physical impacts on previously unrecorded heritage assets due to construction of access tracks or other infrastructure;
 - Permanent physical impacts on previously unrecorded heritage assets due to construction of temporary construction compounds or other works areas; and
 - Temporary impacts on the setting of designated assets within the 1km study area due to the introduction of elements such as machinery and lighting during construction.
807. The results of the appraisal have demonstrated that the majority of the Site was an intertidal area for most of the prehistoric period, and was subsequently used for agricultural activity rather than settlement. No previously recorded assets have been noted within the Site and the archaeological potential is considered to be low. Furthermore, the areas of the Site that fall within the existing A876 carriage way have been previously disturbed and as such have no archaeological potential. As a result, no physical impacts are predicted.
808. Aspects of the construction phase, such as additional lighting and machinery, are not expected to result in a significant impact on the setting of assets. This is largely a result of existing screening from tree cover and topography, as well as the distance between the assets and the Site. Furthermore, the existing power infrastructure and trunk roads that exist in the area means that the additional temporary lighting and machinery will not significantly alter the baseline conditions.

Operational Phase

809. Due to the nature of the Proposed Development, operational impacts are expected to be limited to permanent impacts through change to the setting of heritage assets. The proposed substation represents the key element of above ground infrastructure, and as a result has the II assets, construction and operation effects should be set out separately, with finding on significance of effects, mitigation and significance of residual effects for each. **greatest potential to result in change to the setting of designated assets.**
810. A review of designated assets within 1km of the substation works identified a number of designated assets, however, many of these assets are screened from the Proposed Development as a result of topography, as well as existing screening from the existing built environment and extensive tree cover. This includes the assets located in the settlements of Kincardine to the southeast and Kennet to the northwest, as well as more isolated assets in the surrounding landscape. Furthermore, the introduction of the substation into a landscape

dominated by power infrastructure, as well industrial units to the north on the former Kilbagie Mill/Distillery site, and the A876 to the west, continues the existing character of the area and would not result in impacts to Historic Landscape Character.

811. Assets where there is the potential for impact through change to setting are Tulliallan Castle scheduled monument (SM736), Tulliallan Garden and Designed Landscape (GDL00379), and Kennetpans Distillery (SM5012), and these are therefore discussed in more detail below.

Tulliallan Castle (SM736)

812. The ruin of Tulliallan Castle scheduled monument (SM736) is located approximately 100m to the south of the Site and 400m south of the substation, with an extensive belt of mature woodland screening the asset from the Proposed Development. Originally constructed on a low rock outcrop in the 13th or 14th century, but subject to later remodelling, the hall-house is also associated with a moat. Historic mapping show that a dense band of woodland has existed to the north of the asset from at least the early 17th century, when the Blaeu survey depicts woodland north of the castle⁶⁷. As this survey is based on the Pont survey undertaken in the late 16th century, it is likely that the woodland has always formed something of a screen to the north, with key views, and functional focus of the castle, being to the south and the Firth of Forth. The main entrance to the castle is also located on the south side of the building. As a scheduled monument the asset is considered to be of high value.
813. The Proposed Development will not be visible from the asset due to extensive mature woodland to the north of the castle. Furthermore, while there may have been some views to the north from the castle, the key views appear to have been to the south and the Firth of Forth, and therefore away from the Proposed Development. The immediate setting is also defined as the area within the surrounding moat, and there will be no impacts on this element of the asset. As such, the magnitude of change is considered to be negligible. On an asset of high value this will result in a minor significance of effect, which is not significant.

Kennetpans Distillery (SM5012)

814. The site of the former Kennetpans Distillery is located approximately 800m to the southwest of the Proposed Development, on the north shore of the Firth of Forth. Comprising the former distillery, as well as a quay on the riverside, and an earth mound that may have been formed by ballast from ships, the complex represents an example of a site linked to the early development of industrial scale whisky production in Scotland. As a scheduled monument it is considered to be of high value.
815. While there is the potential for some views of the Proposed Development to the northeast of the former distillery, these will be limited due to the distance between the asset and the substation as well as screening from woodland and the A876 which is on an embankment. Furthermore, the setting of the asset is very much the river edge which provided easy access for the transportation of whisky out of the distillery, as well as the movement of supplies in. A canalised watercourse and a tramway linked the Kennetpans complex to the Kilbagie Distillery to the northeast, located to the north of the Proposed Development. However, both of these links have been interrupted by the introduction of the A876 road, while the remains of the Kilbagie Distillery are no longer visible from Kennetpans due to the later development around the site. Furthermore, the Proposed Development will be located to the east of the former tramway and watercourse and therefore will not sever any views between the two former distilleries. As a result, the magnitude of change is considered to be negligible. On an asset of high value this will result in a minor significance of effect, which is not significant.

⁶⁷ Viewed at [View map: Pont, Timothy, 1560?-1614?; Blaeu, Joan, 1596-1673, Sterlinensis praefectura, \[vulgo\], Sterlin-Shyr - Blaeu Atlas of Scotland, 1654](#), accessed 18th March 2025.

Tulliallan Garden and Designed Landscape (GDL00379)

816. Tulliallan Garden and Designed Landscape (GDL00379) is located to the east of the Proposed Development, and north of Kincardine and the Firth of Forth. The Category A listed Tulliallan Castle (LB16585) is located at the southern end of the Garden and Designed Landscape, however, impacts through change to the setting of this asset have been scoped out as the modern extension added to form the Scottish Police College blocks views towards the Proposed Development, and because of the distance between the building and the Proposed Development. As a result, this assessment focusses on the Garden and Designed Landscape.
817. There is limited information regarding the early history of the designed landscape, although the First Edition Ordnance Survey mapping of the area appears to show the extent of the grounds largely the same as those that survive today. The estate changed hands a number of times in the late 19th and early 20th century, and in the 1950s a large section of the designed landscape was purchased by the Scottish Home Department to form a Police Training College, with alterations since the purchase including the creation of sports pitches, large areas of car parking, and driver training areas, as well as the aforementioned extensions to the main house. These alterations also included the removal of some areas of formal garden, as well as the reuse of walled garden as a carpark, however, the retained mature woodland provides the southern elements of the gardens with a more intimate feel, and also limits views to the west (and the Proposed Development). As a designated asset, containing and providing the setting for, a Category A listed building, it is considered to be of high value.
818. The Site is located approximately 250m from the western limits of the asset, with the area of the proposed substation over 500m from the parkland. Key views highlighted in the HES designation are towards the higher ground of the Ochil Hills to the north, although these views are largely limited to the northern elements of the designed landscape where the more open nature of the parkland enables outward views. These views are also partially interrupted by two existing overhead lines, and these would not change in this area as a result of the Proposed Development.
819. Views towards the Proposed Development are extremely limited as a result of mature woodland that forms the western boundary of the parkland, as well as mature woodland that partially lines the A977. Mature woodland also lines the main railway line running north-south between the asset and the Proposed Development, further limiting views to the Proposed Development. Finally, as noted above, key views from the parkland are limited to the Ochils to the north and the Proposed Development will not interrupt these. As a result, the magnitude of change is considered to be negligible. On an asset of high value this will result in a minor significance of effect, which is not significant.

Cumulative Assessment

820. A cumulative assessment was undertaken based on a review of nearby proposed developments (see Chapter 2 for a full listed of schemes considered). As the Proposed Development will not result in significant physical impacts on heritage assets, there is no potential for a physical cumulative impact. As such, the cumulative assessment was limited to the potential for cumulative impacts through change to the setting of designated assets within the 1km study area.
821. The assessment concluded that there would be no cumulative impact through change to the setting of designated assets. This is largely a result of the cumulative developments being linked to power and infrastructure and therefore of a similar nature to the current landscape character, as well as aspects such as existing screening which would limit views.

Furthermore, the assessments for the consented schemes concluded that they would not result in significant effects on the designated assets assessed as part of this assessment.

Mitigation

822. While the archaeological potential of the Site is considered to be low, a mitigation strategy would be based on a phase of evaluation trenching to be undertaken prior to the commencement of construction. This will be focused on the area of disturbance once the design has been finalised, with the trenching sample to be agreed with the Fife Council and Clackmannanshire Council, but assumed to be in approximately a 3% sample.
823. Further mitigation to be included in the mitigation strategy, if required, will be based on the results of the evaluation trenching and will be agreed with the Fife Council and Clackmannanshire Council. This may include, but not be limited to, archaeological monitoring, archaeological excavation, recording, and publication. It is anticipated that submission and implementation of a mitigation strategy will be included as a condition of any planning permission.

Residual Effects

824. No physical impacts were identified as part of the assessment. It is assumed that standard mitigation measures should mitigate physical impacts on any previously unrecorded assets that might be identified as part of the evaluation works. As such, no significant residual effects are predicted.
825. Similarly, no significant effects on setting were identified as part of the assessment of the operational phase of the Proposed Development. Mitigation, such as planting, will potentially further limit the visual appearance of the Proposed Development in the landscape. However, the significance of effect will remain **minor adverse** which is not significant in EIA terms.

8.6 Summary

826. This chapter provides an assessment of the effects on cultural heritage that are likely to arise from construction and operation of the Proposed Development. The assessment of existing baseline conditions identified 112 designated assets and 182 non-designated assets within the Study Area on the HES datasets as well as the Clackmannanshire Historic Environment Record, with a further three assets identified through a review of historic mapping.
827. A review of this data, as well as other sources such as written sources, historic mapping, and previous boreholes, concluded that the Proposed Development was an intertidal area for much of the prehistoric period, with most evidence for human activity limited to the slightly higher ground. In later periods the land within the Site was largely agricultural, and as such the archaeological potential is considered to be low.
828. While the Proposed Development has the potential to result in physical impacts, the lack of previously recorded assets as well as the low archaeological potential means that the potential for physical impacts is considered to be low.
829. The potential for change to the setting of designated assets was also assessed. This concluded that existing screening from topography, mature woodland, and the built environment, as well as the Proposed Development being located in a landscape dominated by infrastructure and industry, would remove the potential for significant effects arising from change to the setting of designated assets.
830. Negligible impacts were identified in relation to Tulliallan Castle scheduled monument (SM736), Tulliallan Garden and Designed Landscape (GDL00379), and Kennetpans Distillery (SM5012). On assets of high value, these result in minor effects, which are not significant.

831. While the archaeological potential of the Proposed Development is considered to be low, a phase of archaeological evaluation trenching will be required once the full extent of the disturbance has been defined. The trenching sample should be agreed with the Fife Council and Clackmannanshire Council, but is assumed to be an approximately 3% sample.
832. Additional mitigation, if required, will be based on the results of the evaluation trenching and will be agreed with the FCAA.

