

# Drummarnock wind farm - review of HES objection

## Sender

LUC

## Recipient(s)

Client team; Stirling Council

## Project Number

16105

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## Introduction

This report has been prepared by LUC on behalf of Drummarnock Windfarm Limited (the Applicant) following receipt of Historic Environment Scotland's consultation response in respect of the proposed Drummarnock Windfarm (the Proposed Development). This report is intended to set out the Applicant's interpretation of Historic Environment Scotland's (HES) position on historic environment issues that underpinned their objection to the Proposed Development, and also responds to comments made by Dr. Murray Cook, Richard Callender and Jane Brooks-Burnett of Stirling Council during the accompanied site visit of 21 August 2025.

This report examines the basis for HES' objection, provides clarification on certain matters and sets out the policy position on these matters with regard to NPF4.

## National policy context

### Integrity of setting

NPF4 Policy 7, part h states:

"Development proposals affecting scheduled monuments will only be supported where:

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

The Riggihill Wind Farm appeal (PPA-310-2034), in agreed matters between HES and the Appellant, established a useful working definition of 'integrity of setting' for the purposes of the Inquiry:

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“Changes to factors of setting that contribute to cultural significance such that the understanding, appreciation and experience of an asset are not adequately retained will affect the integrity of setting.”

This builds on views expressed by Reporters in earlier decisions, such as Creggan (WIN-130-1), Birneyknowe (WIN-140-7) and Corlic Hill (PPA-280-2022).

However, the Rigg Hill case focused on the test set by SPP paragraph 145, which established a presumption against development that would have any ‘adverse effect on a scheduled monument or on the integrity of its setting’. It must be noted that the NPF4 wording sets the bar rather higher, supporting development only where ‘**significant** adverse impacts on the integrity of the setting...are avoided’ (LUC emphasis).

The Sheirdrim wind farm decision (WIN-130-5) confirmed the need to consider understanding, appreciation and experience of assets in judging effects on the setting of assets. Further, the Reporter noted that, in their view, “ ‘integrity’ is a universal concept, often applied when considering the impacts and effects of development on protected assets/areas. Therefore, the critical matter is, in our view, the **magnitude of impact** and **significance of effect** of the proposal on the setting of an asset.” (paragraph 4.94, LUC emphasis)

## Adopted definition of ‘integrity of setting’

As the best available definition that can be afforded meaningful weight, the wording set out above is therefore adopted to inform this response. Close reading of the text, coupled with the NPF4 stipulation of avoidance of ‘significant adverse effects on the integrity of...setting’, establishes the following:

- ‘Integrity of setting’ depends on the retention of the ability to understand, appreciate and experience the factors of an asset’s setting that contribute to its cultural significance.
  - ‘Adequate retention’ in this context would be the avoidance of significant impacts on the integrity of setting (i.e. the ability to understand, appreciate and experience the contribution of setting to the cultural significance of the asset).
  - It is therefore critical that all assessments and assertions relating to setting are tied back to those factors that contribute to cultural significance, and do not stray into wider matters of visual amenity or other effects.
- The principal objective is conservation (‘adequate retention’) of the setting relationships that contribute to cultural significance (e.g. visual, spatial, symbolic) of the asset.
- The ‘Integrity bar’ is not breached if the ability to understand, appreciate and experience the factors of setting contributing to cultural significance are not significantly impacted.
  - Change in both setting and its level of integrity are therefore permitted, but they cannot constitute significant adverse impacts.
- In order to make judgements on changes to the integrity of the setting of a scheduled monument, a similar judgement on the status quo is necessary to provide a baseline.

It should be noted that a significant impact on the ‘integrity of setting’ under this definition does not automatically equate to a ‘significant effect’ for the purposes of EIA. The latter weighs all elements of change to the cultural significance of assets in the round, in line with established methods. It could reasonably be assumed that for a ‘significant impact on integrity’ to occur, the contribution that setting makes to the cultural significance of an asset would need to be significantly impacted in its own right – setting a higher bar.

## HES objection

HES has objected to the Proposed Development on the following grounds:

- Significant adverse effects to the integrity of the setting of:
  - Stirling Castle (SM90291); and

- King's Yett, cairn (SM2580).

In both cases, HES maintains that these impacts are such that issues of national significance are raised.

The following sections of this note consider the reasons behind these judgements and provide commentary on their accuracy and robustness in planning policy terms, and outline any recommendations to deal with these issues going forward.

## Stirling Castle

### Summary of objection

HES' response focuses on the following elements of the Castle's cultural significance:

- Setting, as experienced from the Ladies' Lookout and the King's Old Buildings.
  - Importance of the Ladies' Lookout as a modern viewpoint for visitors.
  - 'disrupting the ridgeline of this important line of sight' over the King's Knot and King's Park.
- 'Relatively undeveloped' nature of the views to the south-west towards the Proposed Development.
- Setting relationship between the Castle and the Touch Hills, owing to the presence of the medieval hunting forests of Dundaff and Strathcarron.
- Setting relationship with the site of the Battle of Bannockburn.

HES state that the magnitude of the change to the setting of Stirling Castle raise matters of national significance.

### Analysis and commentary

#### Ladies' Lookout

##### Function

It is undeniable that the Ladies' Lookout provides one of the most important and impressive viewpoints for present-day visitors to the Castle. However, its naming is rather more evocative than definitively tied to an attested function. What is certain is that the structures present today comprise the remains of an 18<sup>th</sup> / 19<sup>th</sup> century artillery battery, with the more evocative and aesthetic association being a (potentially relatively recent) historical attribution rather than based in archaeological or documentary evidence. It is not, for example, labelled explicitly – unlike other key features – on John Wood's town plan of 1820.<sup>1</sup> It is, however, annotated specifically as the 'Ladies' Lookout Battery' on the Ordnance Survey town plan of 1860<sup>2</sup>, and on maps thereafter.

We therefore contend that the presence and function of this structure as it survives today is more to do with providing observation and defensive fire to protect the western side of the castle. Indeed, this function is underlined by the projecting bastions, allowing fire to be directed on any attackers approaching or scaling Castle Hill. In terms of visitor experience, this is further underlined by the presence of ornamental cannon.

Nevertheless, the location provides impressive views across the King's Knot, the former royal park and out to the wider landscape that is an important aspect of the visitor experience.

##### Contribution to cultural significance

The function, then, of this part of the asset is indeed about outlook and lines of sight – but for defensive rather than aesthetic purposes. It should be considered to be part of the defensive framework of the 18<sup>th</sup> and 19<sup>th</sup> century fortress. Longer views to the south, while important from a military perspective, are perhaps less effective from this feature than those available from the more elevated Queen Anne Casemates, constructed to protect the main entrance to the Castle as part of its conversion from medieval palace to artillery fortification.

<sup>1</sup> Digital copy available online at: <https://maps.nls.uk/view/74400945>

<sup>2</sup> Stirling – Sheet XVII.3.3, Surveyed: 1858, Published: 1860.

With regard to the experience of modern visitors to this part of the Castle, HES' arguments stray firmly into the territory of visual amenity, which should properly be considered as part of the Landscape and Visual Impact Assessment (LVIA), and is the province of NatureScot as the relevant statutory consultee.

### **View to the Touch Hills and medieval hunting forests from the King's Old Buildings**

HES state that views from the King's Old Buildings (James IV's palace) were specifically designed to engage with the Touch Hills, and the associated hunting forests of Strathcarron and Dundaff.

However, this asserted relationship with the hunting forests is difficult to reconcile with the physical structures and the views available from them. The King's Old Buildings were remodelled from 1496 and realigned, with the principal rooms on the first floor having a broadly western orientation. This range was subsequently reworked as part of the 18<sup>th</sup>-century military re-use, and again in the 19<sup>th</sup> century to provide officers' quarters, with the insertion of the Argyll and Sutherland Highlanders Museum in the 20<sup>th</sup> century. As the phase plan for the asset demonstrates, the window openings are late – probably 19<sup>th</sup> century – insertions as part of the military remodelling of the building.<sup>3</sup> There is no clear evidence that there would have been any sizeable or numerous window openings on this elevation during the 'palace' phase.

The extant windows of this range are orientated approximately west-south-west, with views skirting the northern edge of the King's Park and the terminating at the northernmost scarp of the Touch and Gargunnock Hills. The striking contrast between the steep scarp and the flat lands of the Carse of Stirling, with the distinctive peaks of Ben Lomond, Ben Vorlich and Stuc a' Chroin visible in the sweeping vista to the west and north-west, are the key features of this view.

Actual views to the Carron Valley and Dundaff are not possible, due to the orientation of the windows, and the intervening topography of the Touch Hills in the middle distance. Similarly, given the location of the Proposed Development, it is highly unlikely that there will be direct intervisibility from the King's Old Buildings – particularly given the narrow windows, and the projecting element at the southern end of the structure, further closing off views to the south.

### **Conclusion**

The views from the King's Old Buildings do make a contribution to the cultural significance of this element of Stirling Castle, and to the asset as a whole. However, we would contend that this relates most strongly to the relationship with and the contrast between the strategic position of the Castle, high on its rock, and the flat landscapes of the Forth Valley that the castle dominates, controlling access to crossing points on the Forth, and onwards to the Highlands, both physically and symbolically.

As part of the military remodelling of the Old King's Buildings, the insertion and positioning of the windows are likely to have been more utilitarian than aesthetic, providing functional officers' quarters rather than grand apartments for a Renaissance king. Due to the physical evidence inherent in the structure of the King's Old Building, it is our view that this line of argument should largely be discounted.

The presence of the Proposed Development will do nothing to impinge on the ability to understand and appreciate the cultural significance of the King's Old Buildings, and similarly will not change the experience of the asset or of its significance.

At the level of Stirling Castle as a whole, while the Proposed Development will be visible in long distance views from south and south-western-facing elements of the castle – such as the Ladies' Lookout – but will in no way prevent the understanding and appreciation of the posited spatial and functional relationships with the hunting forests in the Carron Valley. While visible at a considerable distance, the Proposed Development should not be held to result in significant adverse effects to the integrity of the asset's setting as the factors contributing to significance will be 'adequately retained'.

### **Disruption of ridgeline in views over the King's Knot**

HES note that the view to the west from the King's Old Buildings and the Ladies' Lookout is *"a key designed view from the castle, one which influenced the architecture of the castle and the design of its surrounding parkland. It is still relatively undeveloped in contrast to other areas of the surrounding landscape. This view, which can be understood, appreciated and experienced today as it was in the past, is key to understanding, appreciating and experiencing the castle in its setting."*

<sup>3</sup> RCAHMS archive, photographic copy of STD 136/64 P. Digital copy available online at: <https://canmore.org.uk/collection/1435191>

As discussed above, the windows in the western elevation of the King's Old Buildings are comparatively recent insertions. While it is probable that there were windows on that elevation, they were certainly no larger than the current openings. These, particularly given the secondary glazing, do not provide anything approaching a 'panoramic' view to visitors. They are very much functional 18<sup>th</sup> century windows for light and ventilation, rather than for aesthetics. Similarly, given the height of the castle rock, and the angle of the elevation relative to the ornamental gardens, simultaneous views of the King's Knot and the wider landscape are challenging, if not impossible, to achieve from the King's Old Buildings.

This is not to suggest that views to the ornamental gardens below are unimportant – but they are not the focus of these windows, and to suggest that the design of the King's Old Building was a response to the presence of the gardens does not correlate with the physical evidence.

In views from the Ladies' Lookout, the King's Knot is a key feature, with the former King's Park in the middle distance and the forested skyline of Gillies Hill, Lewis Hill and The Fell framing and underlining the open moorland of the site and the existing Craigengelt turbines. This is a very extensive and wide-ranging view. Blade tips of Earlsburn and Kingsburn wind farms are theoretically visible, although are largely imperceptible in reality.

The distance from the asset, and the position of the Proposed Development on a plateau between the elevated crests of Lewis Hill and Earl's Hill, the latter crowned by telecoms masts, helps to keep the perception of the turbines' height in scale with the landscape. Similarly, as the turbines are largely contained by the horizontal extent of the existing Craigengelt scheme, they do not serve to extend the perception of 'industrialisation' of the view.

Here, the emerging cumulative position is an important consideration. The Earlsburn Wind Farm Extension (ECU00004510) would be a significant new presence on the prominent ridge of the Gargunnock Hills, projecting northwards into the Carse of Stirling and introducing substantial numbers of additional turbines into the most sensitive part of the view due west of the Ladies' Lookout.

## Conclusion

It is important to note that the photomontages represent a worst-case scenario, and the way that the view is perceived on site is significantly greater in scope and scale. They also cannot capture important experiential factors that must be weighed in understanding the integrity of the asset's current setting – including the constant bustle of the City of Stirling immediately adjacent, and significant road noise from, and visual intrusion of, the A811 and A84 distributor roads immediately below the Castle Rock, and that of the M9 around 1,300m to the west. These elements – along with modern development in the foreground, including within the former King's Park – are far more distracting and intrusive than turbines at significant distance.

The ridgeline will not be further eroded by the introduction of the Proposed Development. While the turbines will be taller, and will appear as much compared to the extant Craigengelt machines, the distances involved render this change insignificant. No additional 'undeveloped ridgeline' will be lost – in contrast to the Earlsburn North scheme, discussed below.

The ability to understand the cultural significance of the castle – as the nexus around which Scottish nationhood developed, the centre of Royal and, later, Government military and symbolic power; as a strategic asset of the highest importance in Scottish and British history; as the hub around which the City of Stirling has grown and evolved; as both fortress and royal palace, with attendant formal gardens and park; and, as a critical objective and driver of the numerous military engagements in the vicinity – will remain unchanged. Similarly, the ability to appreciate the relationships that underpin that significance will be unaltered. There will be a small change to the experience of the asset, in terms of views from the Ladies' Lookout and other exterior viewpoints in the south-west of the castle (e.g. the wall-walk on top of the Queen Anne Casemates). This cannot be shown to raise issues of national significance as, again, the integrity of setting will be 'adequately maintained'.

## Setting relationship with Bannockburn Battlefield

HES notes that *"views to the south-west of the castle, from the south front of the Palace and the viewing terrace, take in the site of the Battle of Bannockburn. This particular view is likely to have been a key one in the design of the Palace, as it was the victor there which validated the very existence of a Scottish monarchy. The castle's location near the centre of the medieval kingdom of Scotland was also of symbolic significance."*

While views towards the Bannockburn battlefield are technically possible from the south front of the Palace, these are inevitably dominated by the battlements of the terrace, the Queen Anne Casemates, the esplanade and the Church of the Holy Rood in

the foreground – and much of the City of Stirling in the middle distance. The battlefield lies largely beneath the southern suburbs of Stirling, with only relatively small areas of open land remaining – and difficult to perceive in what is a very cluttered visual field. These are principally to the east – beyond the reflective roofs of the Springkerse Industrial Estate – in which in-combination views with the Proposed Development are impossible due to opposing directions.

The view to Gillies Hill is important in understanding a key part of the battle, perhaps as much in folklore as in reality, where on the second day, Bruce ordered in his reserve of Highland troops which finally broke the English army's resolve. Traditionally, the 'Sma' Folk' (camp followers), encamped on Gillies Hill, flooded down the slopes as part of this final advance, causing further panic in the English ranks, as they were perceived as additional reinforcements. They then joined the rout of their heavily armoured adversaries, struggling in the wetlands of the Carse.

The views to this section of the battlefield are available from the Ladies' Lookout, the Queen Anne Casemates, and the southern end of the Queen Anne Gardens. The Proposed Development would appear in the views as a small, distant element, within the horizontal extent of the existing Craigengelt wind farm. Recent housing development at Cambusbarron, at the foot of Gillies Hill, provides a helpful, if intrusive, reference point in the view, marking the edge of surviving open ground in the western portion of the battlefield. There is little direct intervisibility with the battlefield itself in the remainder of views in the south-west to south fields of view, and the National Trust for Scotland visitor centre and the portion of the battlefield in its ownership are obscured by the city in views to the south.

### Contribution to significance

The functional relationship of the Castle with the Bannockburn battlefield is undoubtedly a key part of each asset's significance – the battle having been fought over control of the castle.

The battle occupies a critical place in Scottish history and conceptions of nationhood, even today. By effectively extinguishing the Plantagenet claim to the Scottish throne, securing Bruce as the King of Scotland, and eventually papal recognition of both the Bruce as rightful monarch and of Scotland as an independent nation, the events set in train by Bannockburn continue to resonate today.

The presence of turbines in views towards extant open portions of the battlefield would be entirely incidental to the understanding, appreciation and experience of the visual relationships discussed above. While it would be technically possible to see the Proposed Development at the same time as the remainder of the battlefield, its actual impact on these key factors are negligible. The ability to read the topography, understand and appreciate troop movements and the relationship between key events in the engagement and extant elements of the landscape (particularly the traditional role of Gillies Hill and the 'Sma' Folk') will remain unchanged.

### 'Underestimation' of importance of views / significance of impacts

HES notes that the EIAR 'significantly underestimated both the importance of this view and the impact of the proposals on the setting of Stirling Castle'.

We consider that the importance of the views discussed above were afforded appropriate weight in the context of the cultural significance of Stirling Castle as a whole, and that – as assessed – the ability to understand, appreciate and experience those elements of setting that contribute to that significance are not significantly affected. Hence, no significant adverse impact on integrity was found. Nothing in HES' response would cause a change in that position.

The information provided suggests that HES has not applied a comprehensive view of the setting of Stirling Castle, focusing only on the elements that will be affected rather than applying a more holistic understanding as to the composition of that setting, the very many elements that will not change, and therefore a more accurate view of the magnitude of change and level of effect.

### Integrity of setting

HES states that the effect of the proposal, *"both on [its] own and cumulatively with other schemes, would be such that the integrity of the setting...would be significantly adversely impacted"*.

It is our view that this is an inappropriate application of the wording of NPF4 Policy 7h.

The response does not define either the baseline level of ‘integrity’ of the castle’s setting, nor how this would be changed by the introduction of the Proposed Development. Chapter 10, Appendix 10.2 of the EIAR sets out the relevant considerations in detail.

We are content that the current level of integrity of Stirling Castle’s setting will remain intact – given that all the key elements of that setting that contribute to its cultural significance – as they are currently expressed – will remain intact, as will the ability to understand, appreciate and experience that significance.

## King’s Yett, cairn

### Summary of objection

In relation to the King’s Yett cairn, HES’ principal comment is that turbines will be visible in views to and from the monument and that these are ‘key to the understanding, appreciation and experience of the monument, and thus its cultural significance’.

Again, HES in its response appears not to have defined or provided the relevant context relating to the integrity of this asset’s setting, how it contributes to cultural significance, or how this might change – stating that this would have a “major effect on the setting of the monument, of a magnitude that raises issues of national significance”.

### Analysis and commentary

#### ‘Major’ effect on setting

Here, HES’ approach to setting almost as a separate entity from the cultural significance of the asset is highlighted. This runs contrary to the approach encouraged by all relevant sector guidance, including HES’ own ‘Managing Change’ guidance<sup>4</sup> and the SNH & HES EIA Handbook.<sup>5</sup> Setting exists only insofar as it contributes to the cultural significance of an asset; it is not a separate construct nor protected in its own right.

The methodology applied to the EIA does not, therefore, draw a distinction between effects to cultural significance arising from physical or setting change. For a major effect to occur, this would need to be a large magnitude of change, such that total or near total loss of cultural significance would arise. Clearly, this would not be the case in this instance.

There would be a change in the setting of the cairn, and the turbines would be highly visible from the asset and in some in-combination views when approaching from the east. HES’ response does not acknowledge the current detractors from the asset’s setting – most notably the extensive conifer plantations immediately adjacent, overhead utility lines, and the presence of the Craigengelt turbines and telecoms masts as part of the baseline receiving environment.

The EIAR acknowledges that the turbines of the Proposed Development would appear larger and closer than those of Craigengelt. However, as described in the assessment, this would constitute no more than a minor effect. The relationships between the asset and the surrounding landscape – in terms of its location on a small plateau, the potential relationship with the adjacent watercourse, and putative spatial relationships with broadly contemporary assets in the vicinity – would remain legible and its cultural significance will remain unchanged. It would, as the EIAR acknowledges, change the experience of the asset through the introduction of additional turbines. However, these turbines will be readily understood as being located in a separate landscape unit (i.e. over the horizon) from the slopes above the cairn.

On visiting the cairn, it would appear that the panoramic views to the south-east and east – although restricted by some of the forest – feels like the focus of the monument. As a probably Bronze Age burial cairn, it is less likely that the asset played an active role in ongoing ritual activity (unlike, for example, the larger communal monuments of the Neolithic). It is therefore less likely that processional routes or approaches to the asset would have played an important role in its significance, reducing the magnitude of change to cultural significance.

The integrity of the asset’s setting has already been altered by the presence of the Craigengelt turbines, as well as the conifer plantation that cuts the cairn off from the northern and eastern elements of its setting.

<sup>4</sup> HES (2020; 2016) *Managing Change in the Historic Environment: Setting*

<sup>5</sup> Scottish Natural Heritage & Historic Environment Scotland (2018) *Environmental Impact Assessment Handbook: Guidance for competent authorities, consultation bodies, and others involved in the Environmental Impact Assessment Process in Scotland. Version 5.*



## Conclusion

It is not accepted that there would be a 'major' effect on this asset. As stated in the EIAR, the impacts to the cultural significance of the asset arising as a consequence of setting change will be minor. Similarly, there will be an impact on the integrity of the setting of the asset, but this would constitute a minor change.

It does not appear that a finding of impacts of 'national significance' can be supported by the evidence available.

## Comments of Stirling Council Representatives at site visit

At the accompanied site visit to Stirling Castle in August 2025, Stirling Council's planning and archaeological representatives set out their position that the proposed development was unacceptable due to setting change to Stirling Castle.

In addition to points in common with HES' response, the Council archaeologist explained that they were of the opinion that the views to the west of the castle were more significant than established in the EIAR. In summary, these were related to the central role of Stirling in the formation of the Scottish nation from the 11<sup>th</sup> century onwards. The Applicant entirely accepts the value of recent research into the subject, some of which was published after the original submission was prepared. However, this additional research does not confer either any greater level of importance on the Castle or its landscape – already assets of the highest importance – nor render outward views more sensitive to the proposed development. Indeed, the landscape elements involved are so substantial and immutable that, even accounting for the significant change that has already occurred in the castle's environs, these can all be clearly understood, appreciated and experienced.

## Proposed Earlsburn Extension

Further Environmental Information (FEI) was submitted for Earlsburn Extension (ECU00004510) in early 2025. The removal of a number of turbines, reduction in tip heights, and moving the development back from the scarp of the Touch Hills in views from Stirling Castle, resulted in both HES and Stirling Council withdrawing their objections on historic environment grounds.

Nevertheless, the scheme remains both larger than Drummarnock, and highly visible on a more sensitive part of the skyline – following the Council logic that this skyline represents the visual limit of the 'Royal landscape'. Like Drummarnock, this scheme represents an intensification of existing development, contained within the horizontal extent of extant turbines. Similarly, design work undertaken has been successful in reducing impacts – but with the key difference that this was done prior to submission by the Applicant for Drummarnock.

## Conclusion

As set out above, it is considered that HES' objections are not well-founded in policy and evidence, or provide any grounds on which to revisit the findings of the assessment process. Similarly, Stirling Council's stated position, while based on Dr. Cook's extensive understanding of the significance of Stirling Castle, risks conflating issues of setting with those relating to visual amenity. Here, attention is directed to the recent Craighead wind farm appeal decision, where the Reporter disagreed with HES' approach to setting and views, noting that the impacts in that case 'should more accurately be categorised as a visual effect than an effect upon the setting and/or cultural significance'.

## Integrity of setting

HES has provided insufficient evidence to support their finding of 'significant adverse effects on the integrity' of the setting of scheduled monuments. With regard to Stirling Castle in particular, while setting plays an important role in understanding, appreciating and experiencing the asset's cultural significance, HES and the Council archaeologist's position do not explain how this contribution would be reduced to the extent that integrity would not be 'adequately retained'.

The integrity of setting of both assets can readily be viewed as being 'adequately retained' for the purposes of Policy 7h, and the accepted Rigghill approach.