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By email to: kat@aprs.scot

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Our case ID: 300067710

27 February 2024

Dear Dr Jones

[Whitehall Battery Energy Storage System, on Land Near Cochno Road, East Dunbartonshire \[ECU00004982\]](#)

Thank for your letter dated 14 February 2024 to Alex Paterson about the above development proposal. As Director of Heritage, Alex has asked me to reply on his behalf.

I thought it would be helpful first of all to talk about our role before explaining our comments on the development proposal.

HES and the planning system

Our role in the planning system is to provide advice on the potential impacts of development proposals on the historic environment. More specifically, we are a statutory consultee for planning applications that affect world heritage sites, scheduled monuments and their setting, category A listed buildings and their setting, historic gardens and designed landscapes and battlefields in their respective Inventories and historic marine protected areas. We don't have a role in commenting on undesignated sites and places like the ones you mention in your letter. You can read more about our role in the planning system in [Our Regulatory Framework](#).

Our comments on a development proposal are taken into account by the decision-maker - which in this case is the Energy Consents Unit (ECU). Our comments will be considered alongside other comments made by other statutory consultees, including WoSAS who are East Dunbartonshire Council's archaeological and conservation advisors, and members of the public. The ECU will then weigh these up and reach their decision based on these, and in line with the relevant planning policies and guidance.

Our view on the proposal

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



We reviewed the Historic Environment Desk-based Assessment (DBA) that was included in the consultation and assessed this for our historic environment interests. We noted that there would not be any direct impacts on the scheduled monument known as Cochno, cup and ring marked stone 115m SW of Silver Firs (SM716), and that any setting impacts are unlikely to be significant.

In light of this, we didn't object to the proposals in our advice to the ECU. It is now up to them to consider this alongside other comments when they reach their decision, including any local objections.

Undesignated archaeological sites

I note your specific concerns about the potential impact on unscheduled rock art sites which are near Windyhill Hill Farm and not far from Cochno Road. Although these sites are outwith our remit to comment on, you may wish to consider bringing them to the attention of WoSAS and to the ECU, if you have not already done so.

You may also wish to consider proposing that the undesignated rock art sites be assessed for designation as scheduled monuments. You can do this here: <https://www.historicenvironment.scot/advice-and-support/listing-scheduling-and-designations/scheduled-monuments/propose-a-site-for-scheduling/>. The process can take a number of months though and therefore won't affect this current planning application. We also don't normally schedule sites where development proposals are particularly advanced (see page 7 of our [designation-policy-selection-guidance.pdf](#)).

If you would like to discuss any of the above further, my colleague Nicola Hall, Senior Ancient Monuments Officer (nicola.hall@hes.scot) would be happy to talk with you.

Yours sincerely,

Elizabeth McCrone | Director of Heritage