Scottish CASTLES ASSOCIATION

For everyone who loves Scotland's castles.

6th November 2026

Pam Ewen
Head of Planning, Climate & Sustainability Service
Chief Planner
Fife Council
North St
Glenrothes
KY7 5LT

Re: Hallyards Castle, Auchtertool – Planning Application 26/01243/PPP

Dear Ms Ewen,

I am writing on behalf of the Scottish Castles Association, a Scottish charity dedicated to the protection, conservation and understanding of Scotland's castles and fortified heritage.

The Association has been examining the proposed data centre development on land to the north of Camilla Road, Auchtertool, and is seriously concerned that the current proposals would result in the destruction of Hallyards Castle, also known as Camilla.

We have considered the historical and archaeological evidence, including a detailed assessment prepared for the Association by Simon Forder, and have reviewed the relevant information relating to the planning application. We believe that the significance of Hallyards, together with the recognition it has received from Historic Environment Scotland, warrants a much more rigorous examination of the proposed loss of the site.

The historical and archaeological significance of Hallyards

Hallyards was formerly a property of the Bishops of Dunkeld and was granted to Sir James Kirkcaldy of Grange in 1539. It subsequently passed through the hands of the Boswell, Forbes and Skene families. By 1633, Andrew Skene was styling himself Skene of Hallyards, and the castle became his principal residence.

Although now ruinous, the surviving remains are substantial. The castle occupies a rectangular footprint of approximately 45 by 30 metres, with evidence of buildings around a courtyard, standing masonry, possible tower structures and extensive rubble which may conceal further remains.

Of particular significance is the possibility that some surviving masonry predates the sixteenth century. This raises the prospect of an earlier origin for the castle and potentially important evidence of its development as an ecclesiastical property.

The archaeological potential is considerable. Investigation could reveal important evidence of the castle's construction, architectural character and successive phases of development and occupation. The extent of the surviving masonry and rubble suggests that the visible remains may represent only part of what survives on the site.

This is therefore not simply a matter of preserving a few fragments of a ruined building. There is the potential for a substantial archaeological site, whose full significance has yet to be established.

Historic Environment Scotland's assessment

We understand that Historic Environment Scotland assessed Hallyards on 30 September 2026 and concluded that the site met the criterion of national importance.

Its decision not to designate the site at that time was attributed to the advanced stage of the development proposals.

We consider this recognition to be highly significant. Although the site was not designated, HES's assessment confirms that it meets the criterion of national importance. That conclusion should carry considerable weight when the planning authority considers the implications of its proposed destruction.

We would also question whether the decision not to designate should, in practice, leave the site more vulnerable to loss at precisely the point when its significance has been formally recognised.

Fife Council's own position

We note the response from Fife Council's Built Heritage team, which acknowledged that the proposed development would result in the total loss of the ruinous remains of the castle and cottages. The team considered these to be non-designated heritage assets of regional interest and expressed a strong preference for their preservation in situ.

The applicant was encouraged to adopt an alternative approach which would avoid demolition, in accordance with National Planning Framework 4 Policy 7(o).

We strongly support that position.

We are particularly concerned by the apparent approach within the application documentation, as reported in representations on the application, of recording and subsequently removing the remains, with retention in situ only if considered viable.

In our view, this places the emphasis in the wrong order. Preservation should be the starting point, not an option to be pursued only if it proves convenient or viable within the current development layout.

The Council's own Built Heritage advice recognises the case for preservation. We would therefore urge the Council to ensure that this preference is translated into a meaningful examination of alternatives before the loss of the castle is accepted.

The need to examine alternatives

The submitted development drawings indicate that the proposed data-centre buildings would occupy the site of Hallyards Castle.

The historical and archaeological assessment prepared for the Association identifies the possibility that alternative configurations of the development might allow the castle site to be retained. We recognise that the feasibility of any alternative would need to be assessed against the wider requirements of the development, including access, infrastructure and drainage.

Nevertheless, we believe that the applicant should be required to demonstrate that reasonable alternatives have been properly examined and that the destruction of Hallyards is genuinely unavoidable.

This should include consideration of whether the layout could be amended to retain the castle and its surviving structures in their original position, rather than treating the current layout as an established constraint.

If complete preservation cannot be achieved, we would expect the possibility of retaining and conserving significant sections of the surviving masonry to be examined. Fife Council's own Built Heritage response refers to the meaningful incorporation of masonry from any demolition into the development. However, we would emphasise that this should be a secondary consideration and not a substitute for preserving the castle in situ.

Environmental Impact Assessment

We welcome the decision by Scottish Ministers requiring an Environmental Impact Assessment for the proposed development. The decision, issued on 17 August 2026, means that the application must now be supported by an EIA before it can be properly assessed.

We believe this provides an important opportunity to ensure that the historical and archaeological significance of Hallyards is properly assessed and that the implications of its proposed destruction are fully understood.

In particular, the assessment should address:

- The full extent and significance of the surviving structures and archaeological remains.
- The possibility of earlier phases of construction and the site's potential ecclesiastical origins.
- The direct and permanent consequences of removing the castle remains.
- The feasibility of alternative development layouts which would allow the castle to be retained.
- The potential for conservation and meaningful incorporation of surviving masonry if complete preservation cannot be achieved.

We would not consider a programme of recording and excavation, followed by demolition, to be an adequate first response where the preservation of the site may be achievable.

Our request to Fife Council

In light of the above, the Scottish Castles Association would welcome clarification on the following matters:

1. Will the Council require the applicant to demonstrate that reasonable alternative layouts have been examined, with particular regard to retaining Hallyards Castle in situ?
2. Will the forthcoming Environmental Impact Assessment include a comprehensive assessment of the historical and archaeological significance of the site, rather than relying solely on a programme of recording prior to removal?
3. How will the Council ensure that its Built Heritage team's stated preference for preservation in situ is properly reflected in the assessment and determination of the application?
4. Will Historic Environment Scotland be consulted further, given its assessment that Hallyards meets the criterion of national importance?
5. If the applicant maintains that preservation is not achievable, what evidence will the Council require to support that conclusion, and what consideration will be given to retaining and conserving the surviving masonry?

The Scottish Castles Association would welcome the opportunity to discuss this matter with the Council and to provide further historical and archaeological information in support of the preservation of Hallyards.

We recognise the importance of economic development. However, we believe that the permanent destruction of a site of this significance should not be accepted without first establishing whether the development can be accommodated in a way that allows the castle to survive.

We would be grateful for your response and for confirmation of how the Association's concerns will be taken into account as the planning application and Environmental Impact Assessment progress.

Yours faithfully,



Alastair Milne
Acting Chair
Scottish Castles Association

Cc: Scott Simpson, Planning Officer, Fife Council

Scottish CASTLES ASSOCIATION

For everyone who loves Scotland's castles.

6th November 2026

Mr Scott Simpson
Planner, Major Business and Customer Service
Planning Services
Fife Council
North St
Glenrothes
KY7 5LT

Re: Hallyards Castle, Auchtertool – Planning Application 26/01243/PPP

Dear Mr Simpson,

Please find enclosed a copy of a representation being sent to Pam Ewen, Head of Planning and Chief Planner, concerning the proposed Auchtertool data centre development and its implications for Hallyards Castle.

I would be grateful if you would ensure that the representation is brought to the attention of the relevant planning officers and associated with planning application 26/01243/PPP.

Yours faithfully,

Alastair Milne
Acting Chair
Scottish Castles Association

Patron: The Rt. Hon. the Lord Steel of Aikwood KT KBE PC
President: Professor Richard Oram

Correspondence: Cottown Croft, Forglen, Turriff, AB53 4JN
enquiries@scotlandscastles.org
www.scotlandscastles.org

Scottish CASTLES ASSOCIATION

For everyone who loves Scotland's castles.

6th November 2026

Stephen Uphill
Interim Chief Executive
Historic Environment Scotland
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Re: Hallyards Castle (Camilla), Auchtertool, Fife – Decision not to designate

Dear Mr Uphill,

I am writing on behalf of the Scottish Castles Association, a Scottish charity dedicated to the protection, conservation and understanding of Scotland's castles and fortified heritage.

The Association is seriously concerned about the proposed destruction of Hallyards Castle, also known as Camilla, near Auchtertool in Fife, as part of the proposed data centre development (Fife Council planning application 26/01243/PPP).

We understand that Historic Environment Scotland assessed the site and concluded that it met the criterion of national importance, but decided not to designate it at that time because the development proposals were considered to be at an advanced stage.

We are writing to seek clarification of that decision and to understand how Historic Environment Scotland intends to engage with the planning process as the application progresses.

The significance of Hallyards

Hallyards is a substantial former castle site with a history extending back at least to the sixteenth century. It was formerly a property of the Bishops of Dunkeld and subsequently passed through the hands of the Kirkcaldy, Boswell, Forbes and Skene families. It became the principal residence of Andrew Skene, who was styling himself Skene of Hallyards by 1633.

Although now ruinous, the surviving remains are extensive. The site retains standing masonry, evidence of buildings around a substantial courtyard, possible tower

structures and considerable quantities of rubble which may conceal further structural remains.

There is also the possibility that some of the surviving masonry predates the sixteenth century. If so, this could have important implications for understanding the earlier origins of the site and its potential significance as an ecclesiastical property.

The archaeological potential is considerable. The full extent, development and architectural character of the castle have yet to be established, and substantial evidence may survive beneath the visible remains.

HES's decision not to designate

We understand that HES's assessment concluded that Hallyards met the criterion of national importance, but that the decision was not to designate the site at that time because development proposals were at an advanced stage.

We recognise that designation decisions must be made in accordance with the relevant selection guidance and that HES has to consider the circumstances of individual cases.

Nevertheless, we find it difficult to understand why the existence of development proposals at an advanced stage should result in a site assessed as nationally important remaining undesignated, particularly where those proposals could lead to its complete destruction.

Indeed, the prospect of irreversible loss would appear to make the recognition and protection of the site's significance all the more important.

We would therefore welcome clarification of the following:

1. What were the principal considerations which led HES to conclude that Hallyards met the criterion of national importance?
2. Why did the advanced stage of the development proposals lead to a decision not to designate the site at that time?
3. Was consideration given to the possibility that the development might not receive planning permission, or that the proposed layout could be amended to retain the castle?
4. Does HES consider that the decision not to designate should have any bearing on the weight given to the site's recognised national importance in the planning process?
5. Would HES reconsider designation if the development proposals change, or if the planning application is not determined in the near future?

We would also be grateful if HES could provide the Association with a copy of its assessment, including the relevant supporting information and the reasoning behind the decision.

The planning application and preservation in situ

We understand that Fife Council's Built Heritage team has expressed a strong preference for preserving the remains in situ and has encouraged the applicant to consider an alternative approach which avoids demolition.

The current development layout appears to place substantial parts of the proposed data centre directly over the castle site. The Scottish Castles Association believes that preservation in situ should be the primary objective and that reasonable alternative layouts should be properly examined before the destruction of Hallyards is accepted.

Scottish Ministers have also required an Environmental Impact Assessment for the proposed development. We consider this an important opportunity for the historical and archaeological significance of Hallyards, and the consequences of its proposed removal, to receive proper consideration.

In this context, we would welcome clarification of:

- Whether HES intends to provide further advice to Fife Council as the planning application and Environmental Impact Assessment progress.
- Whether HES will seek to ensure that the possibility of preserving the castle in situ is properly examined.
- Whether HES considers that the archaeological potential of the site has been sufficiently established to justify its removal, or whether further investigation is required before any decision can be made.

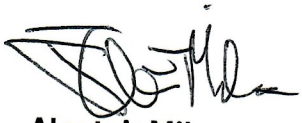
The Scottish Castles Association's position

The Association believes that Hallyards is an important part of Scotland's fortified heritage and that its destruction would represent a significant and irreversible loss. We are particularly concerned that a site which HES has assessed as meeting the criterion of national importance could be lost to development without designation and without a sufficiently rigorous examination of alternatives to its removal.

We would welcome the opportunity to discuss this matter with HES and would appreciate a response setting out the reasoning behind the decision and the organisation's intended involvement as the planning process continues.

We look forward to hearing from you.

Yours sincerely,



Alastair Milne
Acting Chair
Scottish Castles Association

Scottish CASTLES ASSOCIATION

For everyone who loves Scotland's castles.

6th November 2026

Dr Fiona Simpson
Chief Planner and Director for Planning
Scottish Government
Victoria Quay
The Shore
Edinburgh
EH6 6QQ

Re: Hallyards Castle, Auchtertool – Planning Application 26/01243/PPP

Dear Dr Simpson,

I am writing on behalf of the Scottish Castles Association, a Scottish charity dedicated to the protection, conservation and understanding of Scotland's castles and fortified heritage.

The Association is seriously concerned about the proposed destruction of Hallyards Castle, also known as Camilla, near Auchtertool in Fife, as part of the proposed Cato data centre development.

We have been examining the proposals and the historical and archaeological significance of the site. We have also noted the recent interventions by Scottish Ministers requiring an Environmental Impact Assessment and introducing notification requirements for major data centre developments.

We welcome these measures and believe they provide an important opportunity to ensure that the environmental and heritage implications of developments of this scale receive proper consideration.

The significance of Hallyards

Hallyards was formerly a property of the Bishops of Dunkeld and was granted to Sir James Kirkcaldy of Grange in 1539. It subsequently passed through the hands of the Boswell, Forbes and Skene families. By 1633, Andrew Skene was styling himself Skene of Hallyards, and the castle became his principal residence.

Patron: The Rt. Hon. the Lord Steel of Aikwood KT KBE PC
President: Professor Richard Oram

Correspondence: Cottown Croft, Forglen, Turriff, AB53 4JN
enquiries@scotlandscastles.org
www.scotlandscastles.org

Although now ruinous, the surviving remains are substantial. The site retains standing masonry, evidence of buildings around a substantial courtyard, possible tower structures and considerable quantities of rubble which may conceal further remains.

Of particular significance is the possibility that some surviving masonry predates the sixteenth century. This raises questions about the earlier origins of the site and its potential significance as an ecclesiastical property.

The archaeological potential is considerable. The full extent and development of the castle have yet to be established, and substantial evidence may survive beneath the visible remains.

Recognition by Historic Environment Scotland

We understand that Historic Environment Scotland assessed Hallyards on 30 September 2026 and concluded that the site met the criterion of national importance. Its decision not to designate the site at that time was attributed to the advanced stage of the development proposals.

We consider this recognition to be highly significant. It is concerning that a site assessed as meeting the criterion of national importance could nevertheless face complete destruction through development.

The planning position

We note that Fife Council's Built Heritage team has expressed a strong preference for preserving the castle remains in situ and has encouraged the applicant to consider an alternative approach which would avoid demolition.

The Scottish Castles Association strongly supports that position.

The current development layout appears to place substantial parts of the proposed data centre directly over the castle site. We believe that reasonable alternative layouts should be properly examined before the destruction of Hallyards is accepted.

Preservation in situ should be the primary objective. A programme of archaeological recording and excavation should not be treated as an adequate substitute where retention of the castle may be achievable.

If complete preservation cannot be achieved, we would also expect serious consideration to be given to conserving and incorporating surviving masonry into the development. This, however, must remain secondary to the objective of retaining the castle in its original position.

Environmental Impact Assessment and national planning considerations

We welcome the Scottish Government's decision requiring an Environmental Impact Assessment for the Auchtertool development, issued on 17 August 2026, and the

subsequent national direction requiring EIAs for data centre developments exceeding 50MW.

These measures recognise the scale and potentially significant effects of such developments and the importance of considering their impacts at an early stage, when mitigation and alternative designs may still be possible.

In the case of Hallyards, we believe the Environmental Impact Assessment should give proper attention to:

- The historical and archaeological significance of the castle.
- The extent of surviving structures and the potential for further buried remains.
- The recognition by Historic Environment Scotland that the site meets the criterion of national importance.
- The direct and permanent consequences of destroying the castle.
- The feasibility of alternative development layouts which would allow the site to be preserved in situ.
- The potential for conserving surviving masonry should complete preservation prove impossible.

We are particularly concerned that the assessment should not simply document the loss of the castle, but should properly examine whether that loss can be avoided.

Matters on which we seek clarification

We would welcome the Scottish Government's views on the following:

1. How will the Scottish Government ensure that the historical and archaeological significance of Hallyards is properly considered through the Environmental Impact Assessment and subsequent planning process?
2. What weight should be given in the planning process to HES's assessment that the site meets the criterion of national importance, notwithstanding its decision not to designate it?
3. Will the Scottish Government encourage Fife Council to ensure that reasonable alternative layouts, allowing the castle to be retained in situ, are properly examined before the application is determined?
4. Does the Scottish Government intend to provide further guidance to planning authorities on the treatment of nationally important but undesignated heritage assets affected by major development proposals?

The Scottish Castles Association recognises the importance of investment in Scotland's digital infrastructure. However, we believe that economic development and the conservation of Scotland's historic environment should not be treated as mutually exclusive.

The destruction of Hallyards would represent an irreversible loss. We believe every reasonable opportunity should be taken to secure its preservation before that outcome is accepted.

We would welcome the opportunity to discuss these concerns and would appreciate your response.

Yours sincerely,



Alastair Milne
Acting Chair
Scottish Castles Association

Scottish CASTLES ASSOCIATION

For everyone who loves Scotland's castles.

6th November 2026

Mark Wilson
Chief Executive
ILI Group
The Shires
33 Bothwell Road
Hamilton
ML3 0AS

Re: Proposed Cato Data Centre, Auchtertool – Hallyards Castle

Dear Mr Wilson,

I am writing on behalf of the Scottish Castles Association, a Scottish charity dedicated to the protection, conservation and understanding of Scotland's castles and fortified heritage.

We have been examining the proposals for the Cato data centre development at Auchtertool, particularly the implications for Hallyards Castle, also known as Camilla, which lies within the proposed development site.

The Association recognises the scale of the proposed investment and the importance of developing Scotland's digital infrastructure. However, we are seriously concerned that the current development layout would result in the destruction of Hallyards Castle, a historic site with considerable surviving remains and archaeological potential.

Hallyards was formerly a property of the Bishops of Dunkeld and subsequently passed through the hands of the Kirkcaldy, Boswell, Forbes and Skene families. By 1633, Andrew Skene was styling himself Skene of Hallyards, and the castle became his principal residence.

Although now ruinous, the surviving remains are substantial. The site retains standing masonry, evidence of buildings around a substantial courtyard, possible tower structures and extensive rubble which may conceal further archaeological remains. There is also the possibility that some of the surviving masonry predates the sixteenth century, potentially indicating an earlier origin for the castle.

Of particular significance, Historic Environment Scotland assessed Hallyards on 30 September 2026 and concluded that it met the criterion of national importance,

although it decided not to designate the site at that time because of the advanced stage of the development proposals.

We also note that Fife Council's Built Heritage team has expressed a strong preference for preserving the castle remains in situ and has encouraged the applicant to consider an alternative approach which would avoid demolition.

The Scottish Castles Association strongly supports that position.

We believe there is an opportunity to explore whether the development could be configured in a way which allows Hallyards to survive. The Association's examination of the submitted layout suggests that alternative arrangements may be worth considering, although we recognise that these would need to be assessed against the technical and operational requirements of the proposed development.

We would therefore welcome clarification on the following:

1. Has ILI examined alternative site layouts which would allow Hallyards Castle to be retained in situ?
2. Would the company be willing to revisit the current arrangement and explore whether the data-centre buildings and associated infrastructure could be repositioned to avoid the castle site?
3. Has consideration been given to conserving and incorporating the surviving castle masonry into the development, rather than removing it?
4. Would ILI be willing to meet with representatives of the Scottish Castles Association to discuss possible ways forward?

Our preference is firmly for the preservation of Hallyards in its original position. We would not wish to see archaeological recording and the subsequent removal of the remains treated as an acceptable substitute where preservation might be achievable.

We believe that a development of this scale presents an opportunity to demonstrate that modern infrastructure and the conservation of Scotland's historic environment need not be mutually exclusive. Retaining and interpreting Hallyards could also provide the development with a distinctive historic feature and a meaningful connection to the heritage of the area.

We would welcome the opportunity to engage constructively with you and your project team before the planning process progresses further.

Yours sincerely,



Alastair Milne
Acting Chair
Scottish Castles Association