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From: Shepherd, Nicholas [mailto:nicholas.shepherd@forestry.gsi.gov.uk]

Sent: 02 October 2009 13:25

To: Web Site Mail

Subject: Consultation on Historic Scotland Guidance Notes - Managing Change in the Historic Environment

Sir/Madam,

Regards the document entitled 'Managing Change in the Historic Environment: Setting', Forestry Commission Scotland (FCS) offer the following comments for your consideration.

FCS welcomes the clarification of current guidelines in regard to the setting of historic environment assets. Historic Scotland could consider though expanding the scope of this guidance note to include other Environmental Impact Assessment Regulations than simply the development control system. In our opinion, Forest Planners would find them useful when compiling Forest Design Plans, and Conservancy staff when screening and scoping EIA .

However, perhaps a more explicit definition is required of those criteria deemed likely to qualify a historic feature significant enough to warrant consideration in light of setting issues. For example, these guidelines are useful and necessary in regard to major hillforts, celebrated prehistoric funerary and ritual sites and World Heritage Sites such as the Antonine Wall (where issues of setting and forestry will no doubt arise). They will not, however, be required in all cases. Indeed, there is evidence of the overarching criteria (that the asset be designated) being expanded (p4, stage one first paragraph) to include undesignated 'archaeological sites and landscapes'. This will simply dilute the impact of this guidance.

In addition, the document appears to be confused in relation to the Historic Land-use Assessment (a useful tool, particularly in regards to initial data-gathering) and 'historic landscape assessment' (p5, illustration; p8), which does not exist as a dataset for Scotland. The assertion that "Digital Historic Landuse Assessment... can be used to assist in reaching an understanding of a historic structure's place in the landscape and how development may affect it" (p7) is also a little weak without an explicit User Guide to explain how.

I hope this is helpful.

Regards,

Nicholas Shepherd  
Landscape and Culture Adviser  
Forestry Commission Scotland  
Silvan House  
231 Corstorphine Road  
Edinburgh  
EH12 7AT

Tel: 0131 314 6160

Mob: 07881 516602

E-mail: [nicholas.shepherd@forestry.gsi.gov.uk](mailto:nicholas.shepherd@forestry.gsi.gov.uk)