



the
Tobacco Merchants
House
42 Miller Street
Glasgow
G1 1DT

Tel: 0141-221 1466
Fax: 0141-248 6952
Esct@scottishcivictrust.org.uk
www.scottishcivictrust.org.uk

Chairman of Trustees:
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SHEP on Battlefields
Historic Scotland
Room 2.9
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

17th July 2008

Dear Sirs,

Re: SHEP on Historic Battlefields

The Scottish Civic Trust welcomes this draft SHEP on Historic Battlefields. In general the proposals recognise the contribution to cultural heritage that battlefields make, and its role in providing opportunity for economic development and tourism.

We feel that the value attached to battlefields by the community (in its widest definition) could be emphasised more, as these intangible values placed on a site by people will be particularly significant in assessing a site which has already been developed, and are just as important as any physical remains on the site. For example in paragraph 2.7, it states that 'Battlefields have value for the physical remains and artefacts they contain'. The following could be added 'and for the values attached to them by the community and for the wider cultural and historic values that they convey.'

We particularly feel that the protection of the setting of the sites could be explored further. While the landscape context is more strongly emphasised in the criteria for inclusion in Annex A, the issue is rather neglected elsewhere in the document. The Trust feels that in this way the document is inconsistent.

Question 1: Do you agree that a policy for the protection and sustainable management of historic battlefields is necessary? If not, what alternative course of action would you suggest and why?

The Trust agrees that a policy is necessary for the protection of these sites; we feel there should be some protection/management opportunity for the landscape setting and context of the sites as well as the battlefield itself. This is especially important due



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to the difficulty in defining the exact extent of battlefields or where a battlefield could encompass a large area (including approaches to, and from, the site).

Paragraph 3.5 could be amended to read 'for the protection, sustainable management and promotion of significant battlefields and their landscape context.'

Question 2: Do you agree with the scope and definition? If not, what changes would you propose and why?

We would question the need for and the appropriateness of the figure of 500 combatants on each side. Does this refer to those involved in the battle actual, or would it include reserves or other forces related to the expedition? Size is not necessarily the defining factor of a 'significant' battle and there could be smaller battles with a strong regional significance. This figure would need to be flexible or it could lead to significant sites being excluded on a technicality. Also, for more ancient battlefields it may not be possible to make such a precise assessment of the size of each force, and military historians consistently raise issues about the potential inaccuracies of eye-witness accounts

The register should take account of sites of regional/local significance in some way. Also, there should be further guidance to help local authorities deal with these sites i.e. the use of Conservation Area status as a management tool.

Question 3: Are there other reasons for valuing battlefields that should be considered?

This section could go further to emphasise the sense of ownership of these sites felt by the local, national and international community. In addition the possible role of battlefields in promoting tourism and recreation could be discussed.

Question 4: Do you support the proposal to create a non-statutory inventory of nationally important battlefields? If not, what alternative approaches should be considered?

The Trust supports the creation of an Inventory as a positive step towards improved protection of battlefields. We would question whether any battlefield can be 'located accurately' (para 4.10) as this implies definitive boundaries, although we appreciate the very significant problems that can present themselves in determining their exact location.

Question 5: Should an Inventory of Historic Battlefields be given the same status currently enjoyed by Gardens and Designed Landscapes within the planning system?

Since no statutory protection is proposed the Trust feels it would be appropriate that battlefields are given the same status as Gardens and Designed Landscapes as a minimum level of protection. Additional guidance on where it might be appropriate to use Conservation Area status to provide additional protection would be welcome.

Question 6: Do you agree with the purpose of the proposed Inventory? If not, what changes would you suggest and why?



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Working to Improve and Promote Scotland's Built Environment

The Trust agrees with the proposed purpose of the inventory.

Question 7: Do you believe that the criteria set out in Annex A are suitable? If not, what alternative criteria would you suggest and why?

The Trust supports the use of the phrase 'and/or' in paragraph 5.4, which allows a site to be included for its landscape context alone.

With regard to defining boundaries, it is important to acknowledge that it may be difficult to establish definitive boundaries and in some cases, these will be indicative only.

Question 8: Do you agree with the proposed definition of the area of interest? If not, what changes would you suggest and why?

Again the document mentions excluding sites which cannot be 'defined on a map'. We do not agree with this position. It is acknowledged that these boundaries may necessarily be indicative. Furthermore, it should be noted that the limitations in knowledge about a particular site may be the result of a lack of field analysis rather than any other issue. There is a question of what level of evidence is required before the battlefield is included on the inventory.

Defining the boundaries of these sites will present a challenge in that identifying boundaries will be problematic but the definition also needs to be sufficiently robust to withstand scrutiny.

The exclusion of a site from the inventory due to development should be based on not only the physical evidence but the value placed on the site by the community.

The wider landscape setting should also be considered, for example the identification of key views into and out of the site.

Question 9: Do you agree that policies are needed for both the overall area of the battlefield and specific areas within? If not, what changes would you suggest and why?

The Trust supports the identification where possible of core and periphery areas. Some sites may require specific policies for areas within it, others may not. There will need to be a degree of flexibility here depending on the nature of the site. This will also indicate different levels of value within a site and should therefore be considered very carefully.

Question 10: Do you agree that best practice guidance would be useful? If so, who should lead in developing this? If not, what alternative approaches should be considered?

The Trust welcomes the idea of best practice guidance. It is felt that this should be produced by Historic Scotland in order to ensure some consistency across the local authorities. This should then form the basis of each planning authority's own guidance and policy on Historic Battlefields.



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Question 11: Do you agree with the roles identified here? If not, what changes would you propose and why? Are there any other key stakeholders who have significant roles to play?

The Trust generally agrees with the key stakeholders but feels that the community and local groups should be recognised as a key stakeholder. The Trust also notes that all of this will have a resource implication in the field analysis, assessment and management of battlefield sites, particularly at Planning Authority level.

Should you require any further information, we would be happy to assist.

Yours sincerely,

A handwritten signature in cursive script that reads 'Gemma Wild'.

Gemma Wild

Technical Officer (Conservation and Design)

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