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SHEP on Battlefields
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10 July 2008

Dear Sir or Madam

SHEP CONSULTATION – HISTORIC BATTLEFIELDS

Thank you for consulting Scottish Natural Heritage on your draft policy statement on Historic Battlefields. We welcome the proposed policy which, we consider, can help to highlight the wide ranging values of such places.

The attached Annex sets out our responses to the eleven questions asked in the consultation. The main points we wish to draw out are as follows:

- There is a need to acknowledge and identify the important natural heritage features and values that are often associated with historic battlefield sites. We have noted some of these in the Annex in answer to question three. As a specific point, the SHEP could note that a historic battlefield might also include land designated as, for example, a Site of Special Scientific Interest as well as the landscape designations listed in the draft.
- The importance of preparing and implementing integrated management plans for battlefield sites should be emphasised. This should form part of a best practice approach, and should include protocols for resolving any conflicts between desired management for historic and natural heritage priorities.
- Integrated management should also encompass interpretative provision. There are considerable opportunities for adding value to battlefield sites so they can better fulfil the diverse functions they afford to society.

We are happy for our response to be publicly available. If you wish to discuss any of these comments further please contact Laura Campbell (01224) 642863; e-mail laura.campbell@snh.gov.uk in the first instance.

Yours faithfully

Ron Macdonald
Head of Policy and Advice

Working with Scotland's people to care for our natural heritage
Ag obair còmhla ri muinntir na h-Alba airson maith ar dualchas nàdair



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ANNEX

The following are our responses to the questions asked in the consultation.

- 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?**

SNH supports the proposed policy framework for the protection and sustainable management of historic battlefields and their settings. In particular we welcome the positive approach to management that is signalled by the policy.

- 2. Do you agree with the scope and definition [of the draft policy]? If not, what changes would you propose and why?**

No comment.

- 3. Are there other reasons for valuing battlefields that should also be considered?**

We note the comments within the consultation relating to the strong links between landscape and a particular battle or battlefield and the associated military strategies. We also note and fully support the comments regarding the important role that landscape character has in defining the wider associations and sense of place of a battlefield.

However, we suggest that there is an additional range of contributory reasons for valuing battlefields in contemporary society. These include:

- the inherent ecological value of the site, with battlefield areas often including land that is designated for its national or international ecological importance;
- the value of such sites in terms of geodiversity, with battlefields often including large areas of undisturbed geological or geomorphological interest;
- the valuable role such sites play in providing paths or open-space for passive or active recreational activities, often in proximity to local communities;
- the frequent and inter-twinned nature of the above natural heritage interests with the cultural interests of such sites. This often creates places with a very strong identity and value within local communities and more widely;
- the potential for the natural and cultural heritage of such sites to be interpreted in tandem for wider public benefit and understanding;
- the potential economic value of such sites through the promotion of sustainable economic development, tourism and/or other local initiatives.

We consider that these issues are important enough to explore further in policy terms.

Identification of the range and significance of other values within the boundary of the battlefield site would help to ensure that balanced and comprehensive consideration is given to associated values, which may include issues of local, national or international importance. Clear identification of such wider values will be particularly important in drawing up site management plans.

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

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

The inventory approach, through provisions in the General Development Procedure (Scotland, 1992) Order, would seem to be appropriate. It would allow a detailed plan of each battlefield site to be included, and identification of other designations, and of associated values. We suggest that such policies and procedures should ideally also include reference to the *setting* of historic battlefields. We would suggest that Historic Scotland could be the statutory consultee for development proposals affecting inventoried historic battlefield sites.

However, potential weaknesses in following an inventory approach are that (a) not all threats would fall under planning control; and (b) it may not automatically provide for positive management statements to be prepared. Historic battlefields differ in a major respect from gardens and designed landscapes in that they may not be managed as a battlefield (unless in the ownership of, say, the National Trust for Scotland). There is also, conceivably, potential for conflicts between desired management processes for historic and natural heritage priorities. A management strategy would be the initial way to resolve such issues. Consequently, we suggest that preparation and implementation of agreed management plans should be a key objective of the Inventory.

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

SNH agrees with the purpose of the proposed Inventory.

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

SNH does not have detailed comments on these criteria. However, we suggest that it should be made clear how they would operate in practice, for example, if some are essential ((a) and (d) in paragraph 5.4?) and some are optional ((b) and (c) in paragraph 5.4?).

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

It may be helpful if landscape "disturbance" (paragraph 5.7) is further defined. Some types of change, such as forestry, may be relatively impermanent compared to built development.

Appropriately prescribing the contents of the Inventory's entry for each site will be important. This could include key views to and from the battle site, and key landscape components – which will often be of natural heritage value – that may have affected the protagonists' initial selection of the battle site. The landscape context and setting of a site may need identified if the "wider" area beyond the core does not encompass it sufficiently; this will vary with individual sites.

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

SNH is keen to ensure that areas of high natural heritage importance are identified within the supporting information within the Inventory listing. They should also be covered by appropriate policies.

We repeat our recommendation that a management plan or strategy should be prepared for each inventoried battlefield. It could provide more detail on zoning, set out any land management measures needed to improve the site as a historical feature, and make proposals for improving the general public's ability to understand and interpret the area. They would have to be integrated into documents so that, for example, management for historical or archaeological purposes does not cause adverse effects for the natural heritage. The management plans could also allow for a greater coverage of the wider landscape of the area, perhaps highlighting important views from and to the battlefield site.

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?

SNH fully supports the production of Best Practice Guidance for the preparation of management strategies. Historic Scotland is perhaps best placed to take the lead on the co-ordination of this process.

Many battlefield sites will contain important natural heritage interests, often of national or international value. Such areas and interests should be identified in the Inventory entries and suitably addressed in management plans. SNH is also keen for guidance to promote, perhaps through the use of examples, appropriate land use planning and management which can improve the integrity and value of sites in natural heritage as well as cultural heritage terms.

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

SNH generally welcomes the outline of roles and responsibilities here. Other key stakeholders listed in paragraph 6.4 do not include government agencies such as SNH and the Forestry Commission, although it is not clear if these agencies should be additional to those referred to in paragraphs 6.2 and 6.3.

We suggest there is a need to clarify the scope of consultation procedures for planning applications affecting battlefield sites once they are designated. This may suggest a role for Historic Scotland as a consultee or specialist adviser in the planning process in relation to developments on or adjacent to battlefields.

As previously highlighted, and within the terms of the SNH and Historic Scotland concordat, we would wish to ensure that the biodiversity, geodiversity, landscape and recreation and access interests of battlefield sites are properly considered in decision making relating to either planning or management processes. As a contribution to this, SNH would wish to be consulted on draft Inventory entries.

Notwithstanding the provisions within legislation for consultation with SNH for developments or proposals affecting sites designated for their national and international natural heritage importance, SNH would be pleased to contribute to the development of site management plan proposals for sites with notable natural heritage interests.