

10 December 2009

Ref: PF 045/09-10

Gordon Mackie  
Historic Scotland  
Longmore House (E8)  
Salisbury Place  
EDINBURGH  
EH9 1SH

Dear Mr Mackie

**Scottish Natural Heritage Response**  
**Historic Scotland Guidance Notes - Managing Change in the Historic Environment**

Thank you for the opportunity to comment on these documents. We are pleased that the existing guidance is being updated to help the planning community better deliver benefits for Scotland's heritage.

The historic element of the environment makes a significant contribution to the quality and distinctive and varied character of Scotland's landscapes and townscapes. We are content that, overall, the guidance will help to safeguard and enhance these interests, notably in the guidance on Boundaries, Setting and Engineered Structures.

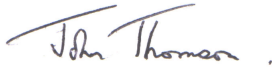
However, we note that encouraging freestanding wind-turbines (page 7, Micro-Renewables) may cause adverse impacts on the setting of historic buildings particularly, if, in sufficient numbers at one location, this leads to cumulative effects. The guidance on Setting could usefully explain the role of Landscape Character Assessment and Landscape and Visual Impact Assessment as two widely used and well-developed techniques that complement Historic Landscape Assessment.

With regard to other natural heritage interests, we suggest that the notes should explain the importance of the historic environment as wildlife habitats and for people's recreation and enjoyment, and should refer to the relevant obligations from legislation on biodiversity and access. For example, the note on Demolition makes no mention of the need to consider protected species which may be occupying a building or other structure. Although paragraph 3.38 in Scottish Historic Environment Policy (SHEP) (July 2009) refers to the need to consider other requirements, lack of any reference in the guidance notes to other statutory obligations could be misleading to users, particularly as the notes are separate publications to SHEP and could be read in isolation.

On a point of presentation, numbered paragraphs would be helpful to users.

I hope that these comments are helpful, but please do not hesitate to contact Deb Munro (01463 725198; [deborah.munro@snh.gov.uk](mailto:deborah.munro@snh.gov.uk)) if you would like to discuss any of this in more detail.

Yours sincerely

A handwritten signature in black ink that reads "John Thomson". The signature is written in a cursive style with a long horizontal stroke at the end.

**John Thomson**  
**Director of Strategy & Communications**