



We safeguard the nation's historic environment and promote its understanding and enjoyment

Graham Esson
Perth & Kinross Council
The Environment Service
Pullar House
35 Kinnoull Street
Perth
PH1 5GD

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Direct Line: 0131 668 8747
Direct Fax: 0131 668 8765
Switchboard: 0131 668 8600
HSSEA.gateway@scotland.gsi.gov.uk

Our ref: AMN/23/76/ABC
Your ref:

16 February 2007

Dear Graham

**Environmental Assessment of Plans and Programmes (Scotland) Regulations 2004
Perth & Kinross Structure Plan Alteration No 1
Indicative Forestry Strategy: Scoping Report**

Thank you for consulting Historic Scotland on the Scoping Report prepared for the environmental assessment of the Indicative Forestry Strategy (IFS), received by the Scottish Executive SEA Gateway on 12 January 2007.

I have reviewed the Scoping Report on behalf of Historic Scotland in its role as a Consultation Authority under the above Regulations (Regulation 17). This letter contains the views of Historic Scotland on the scope and level of detail of the information to be included in the Environmental Report (part 1), and the duration of the proposed consultation period (part 2). I have also provided detailed comments on the Scoping Report in the annex to this letter.

Please note that this response is solely in the context of the SEA Regulations and our role as a Consultation Authority. Historic Scotland will respond to consultation on the IFS itself through the Scottish Ministers in the usual way.

1. Scope of assessment and level of detail

- 1.1 The Scoping Report provides an outline of the proposed approach to the environmental assessment of the IFS, and subject to the specific comments set out below, I am content with the scope and level of detail proposed for the SEA.
- 1.2 My understanding from our telephone discussions is that the IFS will be a strategic planning document and that the outcome will be a plan identifying areas which are or are not suitable for forestry as well as areas with environmental sensitivities. The

policies of the Structure Plan will apply to the IFS. My understanding from the Scoping Report is that the environmental assessment will include assessment of the outcomes of the IFS (i.e. map-based) and its four alternative scenarios.

- 1.3 When undertaking the environmental assessment, you may find that some impacts are uncertain at the strategic level, for example due to dependence on locational factors. Where this is the case it is important to identify these issues and to be clear how they will be taken into account at the lower level, for example at project level, and who will be responsible for following them through. On the other hand, it negates the purpose of SEA to always “park” assessment of impacts until the project stage, as one of the purposes of SEA is to avoid impacts at project level by assessing at the strategic level. A balanced approach is needed.

2. Consultation period for the Environmental Report

- 2.1 I note that May-June 2007 is identified (Paragraph 4.7) for consultation on the IFS and am not entirely clear what the time period will be for consultation on the Environmental Report. Please note that a consultation period of 8 weeks is preferred. For administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.
- 2.2 At the Environmental Report stage, I would prefer to receive paper copies of the report and the IFS, both of which should be sent via the Scottish Executive Gateway in line with the procedures set out in the SEA Toolkit (available at www.scotland.gov.uk/Publications/2006/09/13104943/45).

None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA regulations. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA. Should you wish to discuss this response please do not hesitate to contact me.

Yours sincerely



Amanda Chisholm
Strategic Environmental Assessment Team Leader

Annex A: Detailed comments on the Scoping Report

For ease of reference the comments in this annex follow the same order as the Scoping Report.

Key facts about the IFS/Introduction

1. This section provides useful information about the IFS. I welcome the inclusion of the list of abbreviations and acronyms, as well as the glossary. These will be useful to readers of the Environmental Report.

Description and preliminary analysis of proposed IFS

2. While this background information was helpful I was not entirely clear on what strategic action(s) would emanate from the IFS. This has now been clarified through our telephone discussion – it might be helpful to make it clear in the Environmental Report.

Plan Context

Relationship with other plans, programmes and environmental objectives

3. Appendix 1 provides the policy context for the IFS. In terms of historic environment policy, I note that you have identified NPPG18 and “Passed to the Future”. You may wish to add the following to your list:
 - Scottish Historic Environment Policy 2. Scheduling: protecting Scotland’s nationally important monuments (available at <http://www.historic-scotland.gov.uk/shep2.pdf>)
 - NPPG 5 Archaeology and Planning

Guidance to support these policies is provided in the following documents:

- Memorandum of Guidance on Listed Buildings and Conservation Areas, Historic Scotland, 1998 (available at <http://www.historic-scotland.gov.uk/index/policyandguidance/memorandumofguidance.htm>)
- PAN 42 Archaeology – The Planning Process and Scheduled Monument Procedures

In summary, the key protection objective of the historic environment legislation and policy framework is ‘to protect and, where appropriate, enhance the historic environment’.

4. Figure 3.1 is helpful in showing the relationships between the different stakeholders.
5. Simply for information, Historic Scotland are developing a new series of policy documents (Scottish Historic Environment Policy (SHEP)) that both sets out Scottish Ministers’ vision and strategic policies for the wider historic environment, and provides greater policy direction for Historic Scotland. SHEP 1 is the overarching policy statement for the historic environment. It provides a framework for more detailed strategic policies and operational policies that inform the day to day work of a range of organisations that have a role and interest in managing the historic environment. SHEP 1 was recently available for public consultation; however, I have provided a link to the

draft document, and to the other SHEPs, as you may find them helpful (<http://www.historic-scotland.gov.uk/sheps>).

Compatibility assessment

6. While I applaud the intention to undertake the compatibility assessment (Paragraphs 3.2 and 3.3; Table 3.1), this may present some difficulty given the number of PPS included in Appendix 1. You may wish to consider the scope of the compatibility assessment and how you will present the results in the Environmental Report. For example, you may wish to consider the objectives of the other forestry PPS separately from the environmental PPS.

SEA Objectives and Indicators

7. I welcome the use of SEA objectives as an assessment tool. I have reviewed the SEA objectives provided in Appendix 2 and offer the following comments:
 - Please provide separate SEA objectives for cultural heritage and landscape. The conjoining of these in the Environmental Report prepared for the Scottish Forestry Strategy, for example, made it difficult to ascertain the impacts on the historic environment.
 - The SEA objective identifies certain features of the historic environment i.e. historic buildings, archaeological sites and other culturally important features. I suggest that you re-word the objective to protect the historic environment, which will allow setting to be considered as well as the sites themselves (see Point 9 below).
 - One of the criteria promotes conservation and sympathetic management: is sympathetic management within the remit of the IFS?
 - I welcome the criterion to include consideration of the historic environment in decision-making frameworks relating to woodlands and forestry. How would this be monitored?

8. You may wish to consider the wider definition of the historic environment in defining the SEA objective and criteria. For example, the “historic environment” is defined in Section 16(3) of the Public Appointments and Public Bodies etc. (Scotland) Act 2003 as “... any or all of the structures and places in Scotland of historical, archaeological or architectural interest or importance”. SHEP 1 (para 2.3)¹ builds on this definition by identifying that the historic environment encompasses built heritage features (ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes, as well as marine heritage) and the context or setting in which they sit, and the patterns of past use, in landscapes and within the soil, and also in our towns, villages and streets. It also has less tangible aspects recognised as the historical, artistic, literary, linguistic and scenic associations of places and landscapes.

¹ Historic Scotland is developing a new series of policy documents (Scottish Historic Environment Policy (SHEP)) that both sets out Scottish Ministers' vision and strategic policies for the wider historic environment, and provides greater policy direction for Historic Scotland. SHEP 1 is the overarching policy statement for the historic environment and was recently available for public consultation (<http://www.historic-scotland.gov.uk/sheps>).

The key issues would therefore likely be archaeological sites, both scheduled and unscheduled, historic buildings (including listed structures), gardens and designed landscapes, townscapes (Conservation Areas) and historic landscapes. Potential impacts on both the feature and its setting should be taken into account in the environmental assessment. Baseline information will also need to be collected on these features so that they can be included in the constraint mapping exercise.

9. I have reviewed the indicators set out in Appendix 3. I am not entirely clear what your intention is in regard to Scheduled Ancient Monuments: please could you clarify?

Scope and level of detail proposed for the SEA

Spatial, Temporal and Technical Scope

10. I am content with the spatial and temporal scope of the assessment. I welcome the inclusion of the historic environment in the assessment.

Alternatives

11. I welcome the proposed approach to be taken to assessment of the alternatives and am content with the four scenarios set out in the Scoping Report.

Current environmental conditions in Perth & Kinross

12. I note that the baseline information on the historic environment to be employed in the environmental assessment (second Appendix 3) includes the following: listed buildings, Conservation Areas, scheduled ancient monuments, designed gardens and landscapes, and historic landscapes, through the Historic Landuse Assessment (HLA). You may wish to add sites of archaeological importance to this list.

13. Historic Scotland can provide spatial data for internationally and nationally important historic environment features, including scheduled ancient monuments, listed buildings and gardens and designed landscapes. Information on Conservation Areas and sites of archaeological importance should be obtained from your colleagues in the Council and from the Perth & Kinross Heritage Trust. A list of baseline information sources is provided in Annex B to this letter.

14. I note your intention to explore the potential of the HLA and would be happy to discuss this with you if you would find it helpful. Please note that you do not require Historic Scotland's permission to use the HLA information (see Annex B).

15. Simply for information, Historic Scotland is in the process of undertaking an audit of the historic environment in Scotland. Although the results are not available for this assessment, the audit will likely assist in identifying trends, problems and issues in future assessments.

Environmental issues

16. I am content with the identification of potential impacts on the historic environment identified in Paragraph 5.44.

17. I note your concern about evaluating historic significance and balancing this with other objectives and benefits of forestry and would be happy to discuss this with you if you would find it helpful. Guidance on nationally important historic environment features is also provided in SHEP 2 and NPPGs 5 and 18.

The Strategic Environmental Assessment framework and method

Tools and techniques

18. I welcome the use of constraints and opportunities mapping and am content with the tools and techniques set out here. My comments on the SEA objectives in Point 8 also apply to the CEA objectives set out in Appendix 4.

Significance (paragraphs 6.15-6.27)

19. I accept the significance typology set out in Paragraph 6.16. However, the significance of impact will also depend on the value of the feature affected; the latter is not identified in Table 6.1. I would be happy to discuss this with you if you would find it helpful.

20. I welcome the significance criteria set out in Appendix 5. Simply for information, I append significance criteria included in the Scottish Transport Appraisal Guidance (please see Annex C). You may wish to consider these in taking your significance criteria forward, particularly when it comes to issues of setting.

21. I am content with the assessment matrix set out in Appendix 6 but suggest that a comments column be added to explain the conclusions of the assessment. This will assist in making the assessment transparent and the results accessible to the general reader.

22. I am content with the proposed approach for dealing with uncertainty.

Annex B: Information Held on the Historic Environment

1. Background information on HS and general advice on data is available from the HS website at www.historic-scotland.gov.uk. Information on the historic environment is available from a variety of sources.
2. To comply with the Freedom of Information (Scotland) Act 2002, HS has published a publication scheme to provide access to information collected, held and used by HS. This publication scheme is a guide to the information which HS routinely makes available either electronically through its website, or via its offices. HS's publication scheme can be viewed on the HS website (http://www.historic-scotland.gov.uk/foi_publication_scheme_feb05.pdf).
3. Information on the location and details of scheduled ancient monuments and listed buildings (including supporting information) is provided on Pastmap (<http://www.PASTMAP.org.uk>), a free, interactive, map-based query system developed jointly by the Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS) and Historic Scotland. Databases providing summary information on scheduled ancient monuments and listed buildings are also available on the Historic Scotland website. The underlying scheduled ancient monument and listed building data displayed on Pastmap is also available, under licence, in GIS format (contact hsgimanager@scotland.gsi.gov.uk).
4. Information on the location of designated gardens and designed landscapes is provided on Pastmap. Detailed supporting information on gardens and designed landscapes is provided in the Inventory of Gardens and Designed Landscapes. The Inventory can be consulted at HS offices or is available to purchase from HS and SNH (see below for addresses). The underlying gardens and designed landscape data used on Pastmap is available from Scottish Natural Heritage (contact data.supply@snh.gov.uk). The Inventory is currently being updated; for up-to-date information please contact Historic Scotland's Gardens Inventory Manager Tony Cairns (tony.cairns@scotland.gsi.gov.uk) or the Landscape Historian Raoul Curtis-Machin (raoul.curtis-machin@scotland.gsi.gov.uk).
5. Information on all archaeological/historic sites, buildings and finds recorded in the National Monuments Record of Scotland (NMRS) is available on the RCAHMS website (<http://www.rcahms.gov.uk>). Locational and supporting information is provided on Pastmap.
6. Information on historic landscapes, in particular historic land-use assessment and NMRS data, can be obtained from the RCAHMS website (<http://www.rcahms.gov.uk>). The historic land-use assessment is a GIS-based analysis of past and present land-use, developed jointly by Historic Scotland and RCAHMS. It can be found on the RCAHMS web-site at HLAMAP.
7. Information on cultural World Heritage Sites is provided on the Historic Scotland website (<http://www.historic-scotland.gov.uk>).



8. Wrecks may be protected under the Protection of Wrecks Act 1973, scheduled as ancient monuments or identified as NMRS sites. Information on protected wrecks is available, under licence, in GIS format (contact hsgmanager@scotland.gsi.gov.uk).
9. Local authorities also hold information on the historic environment relevant to their areas. Their archaeological services can provide information on sites included in their Sites and Monuments Records, whilst planning authorities can provide information on conservation areas. Contact details are provided on Pastmap and on the HS website.
10. Contact Addresses:

Historic Scotland
Longmore House
Salisbury Place
Edinburgh EH9 1SH
Tel: 0131 668 8600
www.historic-scotland.gov.uk

NMRS and RCAHMS
John Sinclair House
16 Bernard Terrace
Edinburgh EH8 9NX
Tel: 0131 662 1456
www.rcahms.gov.uk

Inventory volumes 1-5 can be obtained from:

Inventory supplementary volumes can be obtained from:

Scottish Natural Heritage
Publication Section
Battleby
Redgorton
Perth PH1 3EW
Tel: 01738 444177

The Publications Department
TCRE
Longmore House
Salisbury Place
Edinburgh EH9 1SH
Tel: 0131 668 8638



Annex C: Historic Environment Significance Criteria

Taken from Scottish Transport Appraisal Guidance, Appendix C
(<http://www.transportscotland.gov.uk/uploads/documents/j7666-00.pdf>)

Major Adverse

An assessment of 'major adverse' should be realised where a scheme would result in:

- a limited direct impact on or partial degradation of the wider setting of internationally important site(s), resulting in the loss of features to such a degree that the integrity of the site is partly compromised, but not destroyed, or to the extent that their context is compromised and appreciation and understanding is diminished.
- a major direct physical impact on nationally important sites, resulting in the loss of features to such a degree that the integrity of the site is destroyed.
- major visual intrusion into the immediate setting of nationally important sites, to the extent that their context is seriously compromised and can no longer be appreciated or understood. A limited direct physical impact on or compromise of the wider setting(s) of multiple sites of national importance, to the extent that the cumulative impact would seriously compromise the integrity of a related group of sites or historic landscape. ['Related', in this sense, can mean both a linked group of contemporary sites or those illustrating the development of a landscape over time.]
- a major direct physical impact on regionally important sites, resulting in the loss of features to such a degree that the integrity of the site is destroyed, and either no adequate mitigation has been specified or it is incapable of achievement.
- a serious direct physical impact on or compromising of the immediate setting of multiple sites of regional importance, to the extent that the cumulative impact would seriously compromise the integrity of a related group of sites or historic landscape.

Moderate Adverse

An assessment of 'moderate adverse' should be realised where a scheme would result in:

- some limited direct physical impact on nationally important sites, resulting in the loss of features to such a degree that the integrity of the site is compromised, but not destroyed, and adequate mitigation has been specified.
- visual intrusion into the wider setting of nationally important sites, to the extent that their context is compromised and appreciation and understanding is diminished.
- a major direct physical impact on regionally important sites, resulting in the loss of features to such a degree that the integrity of the site is destroyed, but adequate mitigation has been specified.
- major visual intrusion into the immediate setting of regionally important sites, to the extent that their context is seriously compromised and can no longer be appreciated or understood.
- a limited direct physical impact on or compromising of the wider setting of multiple sites of regional importance, to the extent that the cumulative impact would seriously compromise the integrity of a related group of sites or historic landscape.



Minor Adverse

An assessment of 'minor adverse' should be realised where a scheme would result in:

- some direct physical impact on regionally important sites, resulting in the loss of features to such a degree that the integrity of the site is compromised, but not destroyed, and adequate mitigation could be specified.
- visual intrusion into the wider setting of regionally important sites, to the extent that their context is compromised and appreciation and understanding of them is diminished.
- loss of sites or their historic features which are of local importance, but for which adequate mitigation measures could be specified.

Neutral

An assessment of 'neutral' should be realised where a scheme would result in:

- no appreciable effect, either positive or negative, on any known sites.

Minor Positive

An assessment of 'minor positive' should be realised where a scheme would result in:

- removal or mitigation of existing visual intrusion into the wider setting of regionally important sites, to the extent that their context is partly re-established and appreciation and understanding of them is improved.

Moderate Positive

An assessment of 'moderate positive' should be realised where a scheme would result in:

- removal or mitigation of existing major visual intrusion into the immediate setting of regionally important sites, to the extent that their context is significantly improved and can be better appreciated or understood.
- removal or mitigation of existing visual intrusion into the wider setting of multiple regionally important sites, to the extent that the context and the integrity of a related group of sites or historic landscape is re-established and appreciation and understanding of them is improved.

Major Positive

An assessment of 'major positive' should be realised where a scheme would result in:

- removal or mitigation of existing visual intrusion into the wider setting of internationally important sites, to the extent that their context and integrity is re-established and appreciation and understanding of them is improved.
- removal or mitigation of existing major visual intrusion into the immediate setting of nationally important sites, to the extent that their context is significantly improved and can be better appreciated or understood.
- removal or mitigation of existing visual intrusion into the wider setting of multiple sites of national importance, to the extent that the integrity of a related group of sites or historic landscape is re-established and appreciation and understanding of them is improved.
- removal or mitigation of existing major visual intrusion into the immediate setting of multiple sites of regional importance, to the extent that the integrity of a related group of sites or historic landscape is re-established and appreciation and understanding of them is improved.



Annex D: Questions asked in the Scoping Report

1. Are there any plans, programmes, legislation or policy guidance of relevance to the IFS that you consider should be added to the lists in Appendix 1?
Please see Point 4 in Annex A.
2. Are there any SEA objectives that you feel are missing at this stage or any that you feel are relevant?
Please see Points 8 and 9 in Annex A.
3. Are there any indicators that you feel are missing at this stage or any you feel are not relevant or require modification?
Please see Point 10 in Annex A.
4. Is the spatial and temporal scope appropriate?
Please see Point 11 in Annex A.
5. Are the alternative scenarios appropriate or should others be considered?
Please see Point 12 in Annex A.
6. Is the time allowed for consultation adequate?
Please see Point 2.1 in the accompanying letter.
7. Does your organisation have information, or are you aware of such information, beyond that listed in this report, which could contribute to the environmental baseline?
Please see Points 13-16 in Annex A.
8. Are there any further environmental issues that you feel should be considered in the SEA and the Environmental Report and do you agree that the above ones are reasonable and relevant?
Please see Points 17 and 18 in Annex A.
9. Do you think the cumulative effects assessment objectives are appropriate or are there any others you think could be used to benefit the assessment?
Please see Point 19 in Annex A.
10. Do you think the tools or techniques to be used are appropriate or are there any other tools or techniques you think could be used to benefit the assessment?
Please see Point 19 in Annex A.
11. Are the significance criteria appropriate?
Please see Points 20 and 21 in Annex A, as well as Annex C.
12. Is the suggested approach to dealing with uncertainty appropriate?
Please see Point 23 in Annex A.
13. Is the suggested approach to dealing with Appropriate Assessment appropriate?
I have no comment as this is not within Historic Scotland's remit.

