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Dear Mr Hindson

**Environmental Assessment (Scotland) Act 2005  
Highland Council – Supplementary Guidance on Green Networks in Highland  
Environmental Report**

Thank you for consulting Historic Scotland on the Draft Supplementary Guidance on Green Networks in Highland and its accompanying Environmental Report. The purpose of this letter is to provide comments on the Environmental Report (ER) which was received in the Scottish Government's SEA Gateway on 7 October 2010. I am providing this view in relation to our main area of interest for the historic environment.

Overall I thought that the ER was clearly written and comprehensive and I'm content that generally the comments we made at scoping have been taken into account during its preparation. With regard to our earlier comments on the assessment methodology I still have some concerns about the inclusion of the column on 'sensitivity'. My understanding is that this column identifies the 'relevance' of the SEA objective to the purpose or aims of the guidance. My concern is that SEA should treat all environmental topics as equal and should not be used to 'rank' these in order of importance. Were this taken into account in identifying the scorings of the assessment you could see how it might result in the downplaying of effects for the 'less relevant' topics. In this case however there is no evidence to suggest that the rating has had any bearing on the findings. One other point on methodology is that generally we recommend caution in using a calculation to determine the effects of the guidance such as that used in the cumulative assessment. This is because it essentially balances topics against each other and can mask significant effects.

In terms of the assessment findings I agree that the inclusion of listed buildings, locally important archaeological sites, conservation areas and gardens and designed landscapes in the green network could result in positive effects for these aspects of the historic environment by providing better protection for them and their settings. For those assets not included in the framework, specifically scheduled monuments, the effects will be neutral. Perhaps there is scope to improve the performance of the guidance by also including scheduled monuments within the framework.



None of the comments contained in this letter should be construed as constituting a legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity-building in SEA. Please contact me on 0131 668 8744 should you wish to discuss this response.

Yours sincerely



**Hannah Garrow**  
Senior Development Assessment (SEA) Officer