

Directorate for the Built Environment
National Spatial Planning and North Division

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Dear Gordon

Consultation on Historic Scotland Guidance Notes – Managing Change in the Historic Environment

The Directorate for the Built Environment welcomes the opportunity to respond to this consultation.

General

The guidance notes helpfully support the Scottish Government's policy and advice on planning for the historic environment as currently set out in the Scottish Historic Environment Policy (SHEP) and Scottish Planning Policy (SPP) 23: Planning and the Historic Environment which is supported by PAN 42 Archaeology - The Planning Process and Scheduled Monument Procedures and PAN 71 Conservation Area Management.

The guidance notes helpfully encourage a positive and proactive approach to managing change in the historic environment, enabling development and securing best viable use; ensuring the special qualities of the historic environment are protected, conserved and enhanced.

We note that a lot of material in the consultation on the guidance notes is a recast of the withdrawn Memorandum of Guidance but consider that the introduction of pictures and excellent case studies within separate on-line guidance is a positive step and is welcomed in supporting the above.

We note that references to SPP23 : Planning and the Historic Environment are embedded throughout the document. As you know, the Scottish Government is rationalising the Scottish Planning Policy (SPP) and National Planning Policy Guidance (NPPG) series into a single, shorter statement of national planning policy. The initial sections of the consolidated SPP were published in October 2008 as

Scottish Planning Policy (SPP) covering the core principles, aspirations and expectations of the planning system. The remaining sections of the consolidated SPP, covering community engagement, sustainable development, outcomes and the subject policies including historic environment, were published for consultation in April 2009. A further consultation on changes to the sustainable development, climate change, flooding and coastal planning sections and to policy on onshore oil and gas operations and high amenity business locations ran until November 12, 2009. The final consolidated SPP is expected to be published by the end of 2009. SPP23 will therefore be superseded by the consolidated SPP and references within each of the guidance notes will need to be updated accordingly.

Answers to questions in the consultation document

1. In what capacity are you involved, or have you previously been involved, with seeking advice on the Historic Built Environment (e.g. applicant, agent, amenity body, planner, etc)?

The protection and enhancement of the historic environment contributes to the Scottish Government's central purpose. This Directorate sets out the national planning policy for the historic environment and indicates how the planning system will contribute towards the delivery of Scottish Ministers' policies as set out in Scottish Historic Environment Policy. This Directorate expects local authorities and others to maintain and strengthen their commitment to stewardship of the historic environment, and to reflect this planning guidance in their policies and their allocation of resources. Planning authorities should adopt suitable policies in their development plans and give effect to them through their development management decisions.

2. Do you think the guidance notes present Scottish Minister's advice on the Historic Environment in a clear and consistent manner? Please explain why/why not.

The guidance notes are well presented, accessible, clear and consistent and usefully support the SHEP, SPP23 (shortly to be replaced by the consolidated SPP) and PAN series. The layout is good, it is interesting and easy to use. Having separate guidance notes on various topics allows for speedy updates to be made should that be needed in the future.

3. What are your views on the layout and use of images of the guidance notes? It would be useful if you could consider:

- how easy the documents are to read?

The document is easy to read and without the use of jargon. While the format does make it easier if you are just changing a window in a listed building, for example, if you are doing more than one thing, you have to read through many pages of information.

We welcome the information provided in the introductory sections which provides a clear overview of the purpose of each guidance note. The key issues sections outlining the main points to be considered are good and focus each guidance note.

We wonder whether the guidance series can be further streamlined with a short introduction setting out the purpose and context followed by an expanded key issues section, omitting a lot of the background material.

It would be worth strengthening the introductory sections to make the status of the guidance clearer, for example, an important considerations to be taken into account in development plan preparation and development management.

It might also be worth considering the inclusion of a note within the introduction of each guidance note to make it clear that in the interests of brevity and conciseness, and that each guidance note takes account of the general policy in the SHEP and the consolidated SPP.

- are the documents accessible?

The online publication of the separate Guidance notes is be welcomed in line with Scottish Government policy.

- do you think the images are appropriate for the issues they illustrate?

The images are very good giving context to the text and making it a more interesting and varied read.

4. The 14 Guidance Notes replace guidance from the withdrawn Memorandum. What aspects of the Historic Environment should be considered for inclusion in an expanded series in the future?

While the SHEP and consolidated SPP cover the historic environment more generally, the guidance notes are a lot more specific. We recommend that Historic Scotland resists expanding this guidance unless absolutely necessary in keeping with the Government's commitment to a proportionate and practical approach. There is already a lot of information available between the consolidated SPP, the PAN and TAN series, various information booklets and guides and the current fourteen guidance notes.

Overall, the Directorate for the Built Environment welcomes the guidance series.

Please do not hesitate to contact me on 0131 2447530 should you wish to discuss this response.

Yours sincerely

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