

## Implementation of the Removal of the Duty of Planning Authorities to Notify Historic Scotland on Certain Types of Listed Building Consent Applications.

### Response from Inverclyde Council to the Consultation Paper

1. I am involved as a local authority planning officer.
2. Design knowledge and conservation expertise would require to be available. Ideally this should be from within existing staff. This should be assessed following discussion with individual authorities and taking account of past experience in dealing with the applications.
3. I have no objection to the criteria proposed.
4. There should be alignment between national and local policies to ensure that proper decision making.
5. The scope identified seems appropriate. It appears to have worked fairly well in the pilot authorities and it would seem correct that in broadening out the scheme the same criteria should be used unless issues arose out of the pilot. Until the impact of widening the scheme to all authorities has been tested I would not support extending it to Category A buildings. That could be introduced later. I have no particular view as to whether the schedule should be determined by inclusion or exclusion. It is important that the scheme is clear which ever approach is adopted but should also be recognised that it may be impossible to cover every eventuality.
6. The monitoring method seems to be suitable.
7. Monitoring must be part of any scheme in order to assess its effectiveness. Any areas of difficulty or suggestions for improvement can be picked up through the process. It may be through time that the level and nature of monitoring can be reviewed/reduced.
8. The monitoring should be jointly carried out by planning authorities and Historic Scotland. Initially I would suggest quarterly monitoring to see how the process is bedding in with the potential that the monitoring frequency will be decreased possibly eventually becoming annual. Initially again perhaps all cases should be monitored as it may be difficult to get a representative sample. Subsequently a sample may be an acceptable method. For authorities with a smaller number of applications full monitoring will be less of a problem. Could the monitoring be agreed on an authority by authority basis?  
The information submitted as part of the pilot should be used but I think the key issue should be assessing whether Historic Scotland have any concerns about the nature of the decisions taken.

9. Assuming we are talking about demolition of C(s) listed buildings then if these are excluded from the need to notify then monitoring should be included so that the full impact of the changes can be measured.

10. This is linked in to the monitoring process introduced but perhaps the feedback on the information provided could be six monthly or annually.

11. Poor performance by planning authorities in the decision making or changes in circumstances relative to the criteria used to justify inclusion in the scheme would justify review and potential withdrawal.

12. Subject to the details of the scheme being adhered to there should be few concerns about the outcomes from planning authorities and there would be little added value from a formal notification process. The overall speed of decision making without any loss of quality of decision should be improved.

I hope the above is helpful