



Jim MacDonald Deputy Chief Inspector Longmore House Salisbury Place Edinburgh EH9 1SH	Carol Swanson Chair ALGAO:Scotland c/o WoSAS 20 India Street Glasgow G2 4PF
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18 September 2009

Dear Mr Macdonald

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

ALGAO:Scotland represents Local Authority and National Park archaeological services in Scotland and is part of the UK-wide organisation, ALGAO:UK. We do not wish to offer comments directly to this Scottish Government consultation, as its contents do not affect the business of our members in most cases. We do however wish to make a comment on the wording of the model Joint Working Agreement itself.

ALGAO:Scotland had previously raised concerns about the absence of any references in the model Joint Working Agreement to local authority responsibilities for protecting undesignated historic environment resources, particularly archaeological resources, through the planning process. We therefore very much welcome the inclusion of appropriate wording in the model agreement to cover this matter, in particular the need for local authorities to have access to appropriate specialist conservation advice, including archaeologists (Appendix 2 of the model JWA). Appendix 2 also makes reference to authorities having access to an up to date historic environment record.

Though we welcome the inclusion of references to the undesignated historic environment resources within the model JWA, we are disappointed that the wording of the JWA does not go far enough in establishing what is meant by appropriate expertise or an historic environment record. We welcome the reference to membership of the Institute for Archaeologists (IfA), but are concerned about the looseness of the rest of the wording – for example the phrase “where existing staff have developed a sound understanding of historic environment issues based only on experience” is particularly loose. We are also concerned that the terms Historic Environment Record and Sites and Monuments Record are not defined, or the differences between them explained. These terms already appear to mean different things to different people in the absence of national guidance and standards.

In commenting on the revised Scottish Planning Policy, we drew attention to the fact that Planning Advice Note 42 is well out of date. This is the only government document which currently defines what is meant by a Sites and Monuments Record. Our perceptions of what is involved in curating such a record have moved on considerably since PAN 42 was written. We would very much welcome an update of PAN 42, perhaps to include the whole historic environment, and would suggest that a new version of this advice note may be a good vehicle for setting out in detail what is meant by appropriate specialist conservation advice and what is required for an effective Historic Environment Record or Sites and Monuments Record.

ALGAO:Scotland would be very happy to discuss these matters further with Historic Scotland and the Built Environment Division, along with our colleagues in IHBC.

Yours sincerely

A handwritten signature in purple ink that reads "Carol B. Swanson". The signature is written in a cursive, flowing style.

Chair  
ALGAO:Scotland