



Victoria Murray
Historic Scotland
Longmore House
Salisbury Place
Edinburgh EH9 1SH

24 September 2009

Dear Ms. Murray,

Consultation on the Removal of the Duty of Planning Authorities to Notify Historic Scotland on Certain Types of LBC Applications

Thank you for the opportunity to comment upon this consultation.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

The IfA has over 2,800 members and more than 60 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors. Its members are involved with the listed building consent process as historic environment practitioners acting on behalf of applicants, local authorities and other parties and as consultees.

The Institute is also a member of the Built Environment Forum Scotland (BEFS) and endorses the response prepared by BEFS. The only additional comment that we would add is in response to consultation question 2.

What criteria do you think a planning authority should meet in order to qualify for taking on sole responsibility for determining listed building consent applications and what resources do you think may be involved?

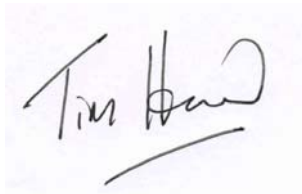
We broadly agree with the pre-requisites identified in paragraph 30 of section 7 of the consultation report (subject to the comments in the BEFS response). Indeed, we commend the reference in appendix 2 of the Joint Working Agreement to staff being *'a member of the Institute for Archaeologists (IfA) or Institute of Historic Building Conservation (IHBC) depending on the role they are expected to fulfil'* (while noting that staff who *'have developed a sound understanding of historic environment issues based only on*

experience' should also be members of an appropriate professional body).

However, we would go further and suggest that the requirements for an organisation (rather than an individual) to have suitable policies and procedures and an adequate system of monitoring in place might best be achieved by some form of accreditation (as is provided by the IfA Registered Organisations scheme).

If the Institute can provide any further assistance please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Policy and Recruitment Manager