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By email and post

16th May 2008

Dear Steve Dowell

Consultation on Scottish Planning Policy 23 – Planning and the Historic Environment

Thank you for consulting the Built Environment Forum Scotland (BEFS) on the above consultation, and in particular for granting an extension to the deadline. BEFS is a forum that brings together 28 non-governmental organisations – both professional and voluntary – that work within the built environment sector. A unique aspect about the membership is that it includes both voluntary sector organisations and professional institutes. In addition, BEFS aims to bring together in one forum representative organisations from both the contemporary and historic built environment sectors. The purpose of BEFS is to raise awareness of policy issues within the sector, encourage debate and share information, with a view to influencing policy and legislation.

This response is supported by the undersigned Members and Subscribers of BEFS. During the consultation period BEFS also facilitated a workshop on the consultation document – the report from this workshop, which was attended by individuals from BEFS member and other stakeholder organisations, can be viewed on the BEFS website at www.befs.org.uk/latest.

This response focuses on a number of overarching issues rather than providing more detailed comments.

Philosophy of the document: Preservation and managing change

As a merging together of the two former documents NPPG 5 and NPPG 18, SPP 23 needs to clearly articulate the philosophies of these two former documents. A key role for the document is not only to cross refer to the SHEP series, but importantly to clearly explain how the values described in the SHEP documents are to be addressed through the planning system, as a system that addresses management of change. The document would benefit from the insertion of a section which expands on the relationship between the SHEPs and on the role of planning in relation to the historic environment. In addition, paragraphs 19-21, which focus on the active management of the historic environment, should emphasise the need to work on an informed basis. The document should

highlight the need for local authority expertise in ensuring effective protection and management of the historic environment.

The historic environment makes significant contributions to other strategic objectives of Government, particularly in relation to sustainable economic growth and place-making; the document should clearly articulate these linkages.

Weakening of language and therefore status of the policy position

There is significant concern over weakening of wording within the document – through use of words such as ‘may’ or ‘can’. It is understood that it was not the intention to weaken the document and it would be worth reviewing the original wording with this in mind and reinstating as necessary. It may be appropriate to leave out some of the text and simply signpost to other documents which provide more detailed wording on the historic environment, such as the SHEP series. The document must be sufficiently robust to hold up in use at Public Local Inquiry. For example:

‘Paragraph 20: the preparation of conservation area appraisals and townscape audits ‘can be’ [suggest ‘is’] particularly useful in informing planning policy and decisions.’

‘Paragraph 25: planning authorities ‘may’ [suggest ‘should’] produce more detailed appraisals, development briefs and design guides and supplementary guidance to ensure that new development is appropriate in terms of its use design and location.’

A framework

It is understood that this document is designed to cross reference to all other relevant legislative and policy material. This cross referencing must be consistent, comprehensive and easy to follow.

Omissions

Certain items that were previously covered in NPPG 5 and NPPG 18 appear to have been omitted from this document. The document should be reviewed to check for consistency in terms of content, weight, and particular requirements between the two previous documents and SPP 23.

Role of Local Authorities and Others

This section should more fully explain and emphasise the key role that local authorities play in managing the historic environment. Description on roles and responsibilities of the key players; local authority, government agency and advisors, and voluntary sector organisations, should be provided in a consistent fashion and cover all aspects of the historic environment.

Statutory Designations

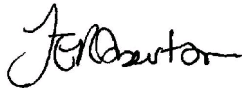
The document should emphasise that the vast majority of Scotland’s historic environment is undesignated.

Model Policies

It is suggested that more information be provided on how to use the model policies, to ensure that they are used as a starting point by Local Authorities in developing policy for the historic environment that is specific to the local context.

I hope these comments are useful – please get in touch if you require any further clarification. I would be grateful if you could keep me informed on the outcome of this consultation process.

Yours sincerely



Jo Robertson
Forum Co-ordinator
Built Environment Forum Scotland

This response is supported by the following Members and Subscribers of the Built Environment Forum Scotland:

Members

Archaeology Scotland
Architectural Heritage Society of Scotland
Garden History Society in Scotland
Historic Houses Association for Scotland
National Trust for Scotland
Royal Town Planning Institute in Scotland
Scottish Civic Trust
Society of Antiquaries of Scotland

Subscribers

Association of Local Government Archaeological Officers in Scotland
Central Scotland Forest Trust
Edinburgh World Heritage