



Via email: planningreview@gov.scot

1st December 2015

Call for Written Evidence – Independent Review of Planning

Archaeology Scotland is a leading independent charity working to inspire communities, amateurs and professionals to discover, explore and enjoy Scotland's past. We welcome the opportunity to provide written evidence at this stage of the review.

The recently launched [Archaeology Strategy](#) for Scotland, the sector-led Historic Environment Strategy for Scotland, [Our Place in Time](#), and the Scottish Government's [Scottish Historic Environment Policy](#) all show Scotland's commitment to caring for Scotland's historic environment resource and to mainstream the historic environment with other areas of government policy and practice. The emphasis, however, on economic growth, and the current financial climate in which all public services and private third sector organisations find themselves, means that there is even more need to secure support for expertise and access to quality data on which decisions are made about planning and development.

Archaeology Scotland has been producing an annual round up of all archaeological fieldwork undertaken in Scotland for nearly 70 years and this journal is a useful gauge of how much knowledge about our historic environment may be slipping through the net due to variances between services within planning authorities. It provides a useful comparison between areas that are well-served with archaeological advice and those that are not. There may be similar levels of housing delivery, for example, in different local authority areas but it is evident that reporting on the archaeology is significantly less in planning authorities where there is no shared archaeological service or dedicated personnel who maintain a database of sites and monuments and have the expertise to interpret the information ahead of development. This is not due to there being less archaeology in certain regions; it is due to there being less dedicated expertise and available data on the impact of development on our unique archaeological resource. An example of good practice can be found in the West of Scotland Archaeological Service which was commended for its [Archaeological Impact Mitigation System](#) in the 2014 Scottish Quality in Planning Awards. The main aim of the project was to look at ways in which changes to the working practices of the

Archaeology Service could be combined with increased use of available online resources, and in particular the e-planning system, to efficiently assess all development proposals for potential historic environment issues, and to greatly enhance the provision of cost-effective expert advice to the planning services of member authorities and to developers where necessary.

We have long argued for the need for a statutory duty to maintain or have access to an up-to-date historic environment record service. The Welsh Assembly introduced the [Historic Environment \(Wales\) Bill](#) in May 2015 which seeks to:

- secure a more stable future for Wales' historic environment records, which provide detailed information and advice on the historic environment to local planning authorities and the public;

We would be supportive of a similar measure in Scotland as there is currently no statutory duty to maintain or have access to an historic environment record and appropriate expertise. We do acknowledge, however, that the impact of development on the historic environment is currently recognised as a material consideration in Scottish planning policy as well as guidance and managing change procedures, and we would not like to see this weakened in the proposed review.

The reason for designating areas for protection under planning and other law is because it has long been recognised by the Scottish Government and the wider Scottish public that these assets are important and need statutory protection, so that they can be cared for into the future. It is not that we are against change but we emphasise this must be done in a structured manner and would argue that the planned system is paramount in ensuring that the historic environment is recognised. We have concerns about the extension of permitted development rights and the potential impact on undesignated sites and monuments which make up the majority of known historic environment assets. We welcome the inclusion of a Sites and Archaeological Interest definition in the General Permitted Development Order as a means of protecting archaeological sites.

We also welcome progress being made to implement Scotland's Historic Environment Data Strategy and the move to make information about the historic environment available digitally. The online portal www.pastmap.org.uk and is complemented by the updated version of the Historic Land Use website <http://hla.rcahms.gov.uk>. Both of these sources can be used a trigger maps and future development could link to the new Land Information Search website to help communities of place and communities of interest to access relevant information and take an active interest.

There are opportunities to improve working in partnership with communities to realise the economic, social and cultural potential of local assets as can be seen in the work of Loch Lomond National Park for example and many of the current issues around community involvement in planning seem to be around poor communication. The National Planning Framework is the spatial expression of the Government Economic Strategy.

It sits at the top of the development plan hierarchy and must be taken into account in the preparation of strategic and local development plans. The efforts to improve links and communication between spatial and community planning are to be welcomed, but this needs to be done in a meaningful and a sustained manner. We would welcome the proposal for a new category of 'Impact Assessment': a 'Social' or 'Community Impact Assessment'. This has regard to the principle established by Sir Patrick Geddes a century ago: that cities and towns are 'organic' and that their essential qualities are comprised, not only of their physical fabric, but also of the lives and activities of their inhabitants.

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