



Planning and Architecture Division
The Scottish Government
2-H South, Victoria Quay
Edinburgh
EH6 6QQ

11th August 2017

Dear Sir/Madam

Places, people and planning: Position Statement and Strategic Environmental Assessment Environmental Report – August 2017

Thank you for the opportunity to comment on the recently published Position Statement on 'Places, People and Planning' which looks at the future of the planning system in Scotland, together with Strategic Environmental Assessment Environmental Report which reviews the Scottish Planning System. As Scotland's leading community heritage charity, Archaeology Scotland is committed to widening access to Scotland's diverse and unique Historic Environment and safeguarding this asset for future generations to enjoy. The planning system is a significant factor in this work, often enabling new and exciting discoveries to be explored and shared with the wider society. We believe that archaeology and cultural heritage can be a significant factor in defining identity and contributes to the health and wellbeing of our society at large, themes shared with some of the proposals presented within the Position Statement. We note the request not to repeat what has already been said but would point out that as there has not yet been any response to previously expressed views, we may at times emphasise points that have been made in the consultation, 'Places, People and Planning'. We attached our original response for reference.

General

While we are pleased to see that several concerns expressed at the initial consultation stage of this process, have been acknowledged, we are disappointed to see that the Scottish Government still intends to pursue the greater use of 'Simplified Planning Zones' and remain very concerned that this could have a significant and adverse impact on Scotland's Historic Environment which ultimately will have a detrimental impact on other sectors such as tourism. We do, however, welcome the over-arching aim to enable greater community engagement with the planning system, but believe that without significant additional resource (to be allocated for training and for facilitating meaningful engagement) this inclusivity will not be achieved. We also welcome the aim to bring Young People into planning conversations (proposal 7), but believe that the Position Statement excludes other new potential audiences to the planning system. Our specific comments are listed below.

Specific Questions

Question 1: Do you have any views on the proposals contained within the position statement?

The Position Statement presents twenty dynamic proposals to transform Scotland's Planning System with over-arching aims including more community involvement and partnership working. However, there is still little detail on how this will be achieved or resourced. Should these proposals be implemented without the appropriate matching resources, we feel that there will be an adverse impact on the Historic Environment. For example the idea of frontloading assessment has the potential to increase pressure on the already stretched local planning authority, potentially leading to incomplete assessments of potential impacts within a development area.

Proposal 4 (Stronger Local Development Plans) proposes to put more emphasis on Local Development Plans which would be examined and 'gatechecked' at initial stages to ensure the required baseline information on environmental assets are included. We maintain that these 'gatechecks' need to be conducted by trained and experienced Historic Environment specialists and we remain concerned that this initial assessment could replace the need for a thorough environmental assessment once the design of a development has been confirmed.

We support proposal 7 (Getting more people involved with Planning) and in particular the goal to include children and young people within the planning system. However, this goal excludes other, seldom heard audiences who currently have no say in place-making and development. Training (for planning staff), increased resources and working in partnership with organisations who have 'access' to these seldom heard stakeholders would enable our planning system to widen audiences, so that everyone's voice could be heard. We welcome the acknowledgment for the need for training in community engagement by both planning departments and developers (Proposal 8), but would add that increased partnership working can also help bridge existing tensions between stakeholders.

We echo the concerns of the joint response from ClfA and FAME regarding proposals to increase and extend 'simplified planning zones' (proposal 12) and remain concerned at the impacts these proposals will have on safeguarding the Historic Environment.

We welcome the inclusion of 'archaeology' within proposal 16 (Developing skills to deliver outcomes) as a priority for training for those who work within the planning system, but are concerned about statements "explore the scope for shared services" and "developing more effective sharing of expertise in some specialisms such as archaeology or environmental assessment". These goals should not come at the expense of the crucial role that an archaeologist embedded within a planning authority can play within the assessment process of a planning application.

Question 2: What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report? (Please give details of additional relevant sources)

We welcome the inclusion of the Historic Environment (3.2.3) within the scope of the document and the recognition of its importance to Scotland's landscapes and wider environment, together with the statement that "Many further archaeological resources remain undiscovered".

Looking specifically Appendix A, Section 8 (Cultural Heritage and Historic Environment), we are pleased to see the recognition of the role heritage assets can play in our sense of place and cultural identity, and their contribution to the Scottish tourism industry. As non-renewable resource, it is imperative that this resource is protected within the planning system. While the key points highlight that "the importance of many sites is reflected in their designations", it should be acknowledged that these designations only cover an estimated 8% of Scotland's archaeological resource, with the remaining 92% often reliant on a vigorous planning assessment to be understood, enjoyed by all and if necessary, protected.

Archaeology Scotland is a member of the Built Environment Forum Scotland (BEFS) and we echo BEFS response that data on these 92% of sites is often held and maintained through Historic Environment Records, held by local councils, which should be identified within this baseline assessment.

We would also like to highlight that there are now six World Heritage Sites within Scotland, rather than the stated five (within table 8.4.1).

Question 3: What are your views on the predicted environmental effects as set out in the Environmental Report?

We support the statements presented within the ClfA/FAME response and only add that we strongly disagree with the statement presented 3.3.19 (of the SEA report), that no significant environmental impacts are likely to arise from potential changes to 'Simplified Planning Zones'. As stated above, any unidentified archaeological remains, not identified at the 'gatecheck' stage, will likely be destroyed before appropriate assessment can take place.

Question 4: What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

We welcome the statement within 5.1.2 (of the SEA report), which identified the importance of existing environmental assessment mechanisms for managing impacts on assets within a development area, but feel that statement is at odds with proposals presented within the SEA and the Position Statement, to enable development through 'Simplified Planning Zones' and increased permitted development rights. We fail to see

how these new proposals protect and enhance the Historic Environment and seek further clarification on these issues.

As expressed within our original consultation response, we remain concerned at the proposal to remove 'supplementary guidance' (proposal 4) and feel that the position statement and the SEA report has not provided additional detail on how this change will be managed to avoid adverse impacts on the Historic Environment. As with our points above (regarding 'Simplified Planning Zones' and increased permitted development rights), the removal of supplementary guidance applies increased pressure at the 'gatecheck' stage of the planning process. We request that further clarification on this issue is given.

Yours faithfully



Eila Macqueen
Director