

Elizabeth McCrone
Policy & Designations
Historic Environment Scotland
By email

19th February 2019

Dear Elizabeth,

CONSULTATION: Designations and Scheduled Monument Policy

We have been alerted to the current consultation on the documents entitled '*Principles and Practice for Designation*' and '*Scheduled Monument Policy and Procedures*'. We have undertaken the online survey, but would like to expand our key comments a little further here.

Title of the documents:

It would be preferable to have the key word (listing or designation) as the first term in the title, rather than the last. This will make it easier to search for and remember - a subject is more memorable more than an action. The two documents should be a pair, similarly named. For instance:

- Designation Principles and Practice
- Scheduled Monument Policy and Procedure (Could this be changed to SM Principles & Practice too?)

HES Role

We do not see the need for World Heritage Site guidelines to be included as part of this document. This would be better as a stand alone document, rather than making this document appear bulkier than it needs to be. WHS is a specialist application not relevant to the majority using this document on a daily basis.

Principles & Practice

From the moment the application is received, the site should be considered to hold temporary 'listed status' to avoid tragic situations of worthy buildings being demolished during the process, as was seen in Bristol in 2018. Wales has recently adopted this system, and we believe it is very helpful in offering protection in the interim period. It is an advanced policy, offering the greatest possible protection to buildings during a period when they are potentially at great risk. We strongly urge HES to consider this as a key amendment to the process of designation assessment.

Development Proposals and Designation

This section explains the need for designation decisions not to be seen to unduly interfere with project that is already well underway. However, we view this as a potentially huge risk for an unlisted building or site. The way this section is written makes it sound very much as if the developer has control - when they read this guideline, they will immediately get their plans fully

developed in order to make it less likely HES will list the site. That is not good news for the historic environment and should be avoided at all costs. HES should be in control of the situation, not the developer.

Scheduled Monument Consent

Notification of proposed works should be easier to find. A published weekly list, or a clearly signposted list on your website of current applications should be made available to allow for easier commenting by outside bodies, and therefore greater transparency of decisions. It is currently very hard to work out what the current applications are, and what their status is. A system that can be sorted by submission date, number, geographical area etc (similar to the planning portal) would be of huge benefit in enabling heritage organisations such as ourselves, and indeed local communities the chance to comment on applications.

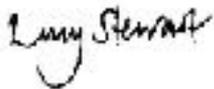
Part E

Paragraph 55 & 56 - As mentioned above, a centralised list of all SMC applications should be made available to allow heritage groups easy access for commenting purposes.

We hope that these comments will be of assistance during the review process. We would be very happy to discuss any of these items with you further if that were useful.

Please keep us informed of the status of these documents as appropriate.

Yours sincerely,

A handwritten signature in black ink that reads 'Lucy Stewart'.

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Scotland Officer

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