

Managing Change Guidance Note: Working on and near to scheduled monuments - Consultation

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Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment. BEFS is a member of the [Climate Heritage Network](#).

BEFS is aware of the responses from several Members, notably the Association of Local Government Archaeological Officers (ALGAO), the Society of Antiquaries of Scotland, and the Chartered Institute for Archaeologists (CifA). BEFS echoes the broad support for the approach being taken, particularly around clear language. Examples of clearer wording have been provided by the Society of Antiquaries of Scotland.

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BEFS wishes to support the responses of these Member organisations, who are most closely associated with the direct impact of this particular Managing Change guidance.

General concerns can be covered by comments relating to potential dialling-down of the necessity for specialist skills when working on Scheduled Monuments, and the potential for confusion when Scheduled Monument Consent, Listed Building Consent and planning permission are being sought in various inter-connected combinations.

Other comments BEFS received noted that more graphic indications (such as indicative images of what an appropriate buffer zone might be) and simple charts of process could enhance the accessibility of the document and its information.

We are aware that CifA and the Society of Antiquaries of Scotland have both highlighted the importance of the consistent use of correct terminology. Noting there are instances of incorrect terminology, where, to put it simply, 'archaeology' is used to refer to 'buried things' rather than 'the process of analysing' the things themselves.

BEFS supports the clarification points around which entity has responsibility for aspects of legislation and decision making by ALGAO - and would welcome these within the guidance document. Perhaps examples showing both Planning Permission and SMC in tandem (relating to the suggestion for a process chart above) could be helpful in clarifying areas where practitioners know that clearer guidance is needed by those seeking consents. It is possible that appropriate case studies will also give greater understanding.

ALGAO also want more clarity around the 'buffer zone' and the role of Local Authority Archaeologists – again BEFS would suggest that illustrations (whether dealing with process, responsibility, or various consents) could aid in making the guidance more accessible. A point reiterated by comments from the Society of Antiquaries of Scotland.

It is appreciated that this is a HES document, and deals more specifically with the legislative process from HES' perspective. As this document is potentially (ideally?) the initial place for guidance to be sought, more signposting to the interconnection of the process with local and planning authorities, as well as HES' own policies and guidance could be made.

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:
<https://www.befs.org.uk/resources/consultations/>

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