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Development Assessment Team
Historic Scotland
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07 January 2013

Dear Mr McKenzie,

Consultation on SEA Scoping Report for the Review of Historic Environment Policy

Thank you for the opportunity to comment on this scoping report. IfA is happy to continue to engage in, and contribute towards, the development of Scottish Historic Environment Policy.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,200 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors. . IfA's Scottish Group has over 200 members practising in the public, private and voluntary sector in Scotland.

Furthermore, IfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

Scoping Report for the Review of Historic Environment Policy

General

IfA appreciates the specific nature of this consultation and confines its response to answering the questions posed in the scoping report. The Institute will comment on the content of the reviewed SHEP at the appropriate time.

1. What do you think of the proposed approach to the assessment?

1.1 IfA is generally supportive of the proposed approach to the assessment.

1.2 In particular, we welcome the recognition (at page 5)

(i) that undesignated assets can '*make an important contribution to the historic environment*' and are an integral part of the focus of cultural heritage objectives

- (ii) that impacts upon the wider setting of historic assets are an important consideration
- (iii) that the importance of the historic environment to the economy and well-being of Scotland's communities should be considered in any assessment.

1.3 However, given the nature of archaeological evidence, the focus of cultural heritage objectives should include unrecognised (and as yet unknown) sites. The '*many ... unrecorded sites and unknown resources throughout the country*' are acknowledged at page 16 of the report.

2. Are there any further sources of information that we should consider within the assessment?

2.1 Evidence of both recognised and (in some cases) unrecognised sites and other assets could be found in Sites and Monuments Records / Historic Environment Records and it is assumed that these would be consulted.

2.2 With regard to historic assets in the marine zone, the information under 'Cultural Heritage' in Annex A at page 16 of the report does not include wrecks sites protected under the Protection of Wrecks Act 1973 (pending designation as historic marine protected areas) nor make clear that Scotland's scheduled monuments include maritime assets such as the remains of the German High Seas Fleet at Scapa Flow. It is clear from the preceding paragraph that the report recognises the need to consider the marine zone (at least to the 12 nautical mile territorial limit). It should also consider the extent to which it should consider marine assets beyond 12 nautical miles.

3. Do you have any views on the level of detail to be provided in the Environmental Report?

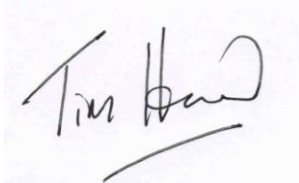
3.1 IfA appreciates the high level at which this assessment will be carried out and the need to make a proportionate assessment.

4. Are you content with the approach to early and effective engagement in the SEA, including the key stages and timescales for responding?

4.1 Yes.

IfA looks forward to engaging further and in more detail in the review of the SHEP, itself. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,



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Policy Advisor