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05 November 2015

Dear Sir / Madam,

**Consultation on Draft Managing Change in the Historic Environment Guidance Note – World Heritage Sites<sup>1</sup>**

Thank you for the opportunity to comment on this draft guidance note.

**The Chartered Institute for Archaeologists**

The Chartered Institute for Archaeologists (CIfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,300 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.

CIfA's Scottish Group has over 250 members practising in the public, private and voluntary sector in Scotland. Furthermore, CIfA 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.

**Draft Managing Change in the Historic Environment Guidance Note – Gardens and Designated Landscapes**

**Question1: Is this document useful?**

1.1 Yes. This guidance provides a welcome addition to the Managing Change Guidance Notes. CIfA continues to support this suite of guidance which has an important role to play in

ensuring that the management and protection of the historic environment is fully addressed in the operation of the planning system.

**Question 2: Does the document leave out anything that should be included?**

2.1 The draft guidance note generally covers those areas relevant to the consideration of World Heritage Sites in the planning process.

2.2 However, we would like to see specific attention paid in section 4 (*'Assessing impact on OUV'*) to the position where development proposals potentially have archaeological implications. In such cases the guidance note should identify the need for archaeological desk-based assessment or field evaluation in accordance with ClfA Standards and guidance (see <http://www.archaeologists.net/codes/ifa>).

2.3 Consequently, section 7 (*'Further Information and Advice'*) might also contain a reference to ClfA and its website (<http://www.archaeologists.net/>) as the source of information on archaeological Standards and guidance.

2.4 Reference might also be made to the guidance of Historic Scotland (as was) to *'Development proposals within World Heritage Sites'* (<http://www.historic-scotland.gov.uk/development-proposals-within-world-heritage-sites.pdf>), unless that document has been withdrawn, in which case this should be made clear in the current note.

2.5 Further detailed comments on the draft are provided in response to question 6 (additional comments) below.

**Question 3: Does the document include anything you think is unnecessary?**

3.1 No.

**Question 4: Do you have examples you would like us to use to help us illustrate any of the points made in the documents?**

4.1 No.

**Question 5: As we continue to develop our suite of guidance are there topic areas You would like to see covered?**

5.1 Undesignated assets of archaeological interest.

**Question 6: Additional comments**

6.1 The *'key issues'* section is useful, but might benefit from the following minor revision:

- it would be helpful specifically to identify in this 'headline' section that World Heritage Sites are historic assets and dealt with as such in the planning system
- it would also be helpful to flag up the relevance of setting in this section

- the reference in paragraph 4 (*'World Heritage Sites are a material consideration in the planning system'*) would be better phrased as *'The impact of development upon World Heritage Sites is a material consideration in the planning system.'*

6.2 Similarly, the reference in section 3.2 (*'OUV is a material consideration in the planning process ...'*) would be better phrased as *'The impact of development upon World Heritage Sites and their OUVs is a material consideration in the planning system.'*

6.3 In section 4 (*'Assessing impact on OUV'*)

(1) ClfA would like to see reference in relation to step 1 (understanding the asset(s)) to consulting the appropriate Historic Environment Record (a key tool in the management and protection of the historic environment in the planning process).

(2) In the second paragraph under step 4

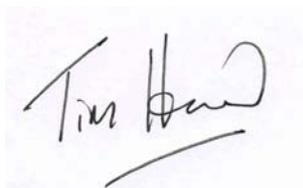
(i) the words *'or offset'* should be inserted in the first line after the words *'mitigation to minimise ...'*, given the fact that archaeological excavation and recording strictly constitute compensation (through an increase in knowledge) rather than mitigation of harm as is recognised in the wording of paragraph 4.30 of PAN 1/2013)

(ii) the reference to *'Scottish Government's guidance on mitigation (Planning Advice Note 1/2013)'* might more clearly be re-phrased as *'Scottish Government's guidance on mitigation in its Planning Advice Note 1/2013 on Environmental Impact Assessment'*.

6.4 The first sentence of section 5.2 (*'Role of the planning authority'*) focuses on designated historic assets but should not overlook the important role of local planning authorities in relation to undesignated historic assets.

ClfA would be happy further to contribute to the formulation or revision of this and other guidance notes for managing the historic environment in Scotland. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,



Tim Howard LLB, Dip Prof Arch  
Senior Policy Advisor

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<sup>1</sup> <http://www.historic-scotland.gov.uk/mcgn-draft-consultation-whs.pdf>