

My ref: NPF4Scot
Your ref:
Date: 28th April 2020
Contact: John A Lawson
Direct dial: 0131 558 1040
E Mail: John.lawson@edinburgh.gov.uk



Association of Local Government
Archaeological Officers:UK

c/o City of Edinburgh Council
Archaeology Service
Museum of Edinburgh
142 Canongate
Edinburgh
EH8 8DD

RE: NPF4 Call for Ideas

Dear Sir/ Madam

The Association of Local Government Archaeology Officers (ALGAO) welcomes the opportunity to share our thoughts and opinions to inform the formation of the forthcoming NPF4.

The main area of our response is in relation to the Historic Environment both in a high-level strategic sense and a practical 'boots on ground' sense. Twenty-eight (28) of the Thirty two (32) council areas in Scotland are currently members of ALGAO and the experience of our member's representatives extends right across Scotland from the Shetland Isles to the Scottish Borders. All our members' representatives are either based in or work with Local Planning Authorities and as such are uniquely positioned to understand and advise on Historic Environment issues within the planning regime. We are the link pin between the National Agencies, Local Authorities, the wider Heritage Profession and local communities and regularly work with and advise all of these parties.

We welcome the proposed key objective of NPF4, *'To support the understanding, protection and importance of the historic environment so that the cultural, social, environmental and economic value of our heritage continues to contribute to Scotland's well-being.'*

We would like to stress the following areas in the formation of NPF4:-

- it is essential to continue to ensure that the existing policies, relating to the Historic Environment, in SPP are not lessened in the revised NPF4, indeed there is the opportunity to make them more robust and fit for purpose

John A Lawson, c/o City of Edinburgh Council, Archaeology Service, Museum of Edinburgh, 142 Canongate, Edinburgh, EH8 8DD; Tel 0131 558 1040 john.lawson@edinburgh.gov.uk

Hugh McBrien, c/o West of Scotland Archaeology Service, 231 George Street, Glasgow, G1 1RX; tel: 0141 287 8332 email: Hugh.McBrien@wosas.glasgow.gov.uk

- PAN 2/2011 Planning and Archaeology is widely regarded as a fundamental and key document underpinning and successfully delivering SPP, providing the important technical details which the implementation of the Historic Environment policies in Scotland relies upon. It is regarded as essential that this document or at least a document of similar detail and weight is retained going forward and we welcome the opportunity to work with Scottish Government in formulating any such new document.
- It is imperative that NPF4 references the need for Planning Authorities to have access to a properly managed HER and also have access to the requisite expertise to properly interrogate, understand and translate the information contained within it. This is to ensure that planning advice relating to the Historic Environment is sound, adequate, proportionate and sustainable.

There are other areas that we would also like to highlight and suggest consideration of going forward:-

- The Ironside Farrar study indicates that flexibility in relation to the historic environment is not required and that Historic Environment Scotland (HES) provide detailed guidance which is considered sufficient. We would suggest that this is an important misunderstanding of HES's remit and role, particularly in relation to the protection, management and conservation of Scotland's undesignated Historic Environment (which is acknowledged as being more than 95% of the known resource in Scotland). It is essential therefore that NPF4 contains policies to ensure that our undesignated heritage (Archaeological sites and Monuments, unlisted historic buildings and historic landscapes) continue to be given due consideration as diminution of these will significantly impact upon the sense of place and the wider environment.
- The Ironside Farrar study also notes that *Archaeological studies are difficult to apply due to resourcing issues in smaller localities*. As evident from our annual reports we do not recognize this statement as archaeological work arising from the Planning System is undertaken across all ALGAO member Authority Areas. Furthermore, we are unclear on what this is referring to as within the planning regime archaeological mitigation is only undertaken either to seek to understand the potential impacts of development on an area or to mitigate the impact. The practice is largely undertaken by commercial companies who work with the developers, the economic importance and scale of which was highlighted in Landward Research Ltd.'s, 2019, report commissioned by ALGAO 'Archaeology in Development Management'. <https://www.algao.org.uk/archaeology-development-management>
- It is noted that it has been suggested that HEPS and OPiT are sufficient in terms of policy for managing the Historic Environment through the planning regime. While these documents are useful they are both high level documents and often lack the necessary technical details required to base sound decisions upon. Specifically, where undesignated archaeological remains and Battlefields are concerned. Both areas were highlighted in the Ironside Farrar report as being covered by national guidance. This is not the case as responsibility for undesignated archaeological remains (which is over 95% of the archaeological remains in Scotland) lies with the Local Authority and the main policies are within LDPs. While the

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designation of battlefields lies with HES the responsibility for the day to day management of them through the planning regime lies with Local Authorities.

- There is an opportunity during the formation of NPF4 to examine the language that is used within planning in relation to the Historic Environment. This would enable the advice given to planning authorities to be more appropriate and consistent. As an example, the importation of the term 'cultural significance' from the designation process is not particularly applicable to the majority of the historic environment as dealt with through the planning regime. We would recommend that the definition of cultural significance, out with designated remains, is best defined by Local Authorities as a degree of flexibility is required in this instance.
- The inclusion of Heritage in local place plans should be done carefully. As although we generally welcome this our collective experience suggests that significant input from the Local Authority is required in terms of information and advice as how to manage the Historic Environment in relation to development plans.

Finally, we would commend and support the wider aims of NPF4 in seeking to ensure that planning in Scotland seeks to *manage the development and use of land in the long term public interest* through sustainability, placemaking, strengthening communities and responding to climate change. We note that all of these aims have benefited from the having robust policies relating to the Historic Environment in place and we would strongly recommend that during the formation of NPF4 this robustness is maintained, if not strengthened.

ALGAO is committed to working with Scottish Government and the sector to help in delivering NPF4 and we would be happy to provide any further information or comment that is required at this stage and in future.

Yours Faithfully



John A Lawson MA MCIfA FSA Scot
ALGAO: UK Chair

p.p. Hugh McBrien, Chair ALGAO: Scotland

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