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Your ref: S2/9

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Dear Mr Bean

Perth & Kinross Structure Plan Alteration No. 2 and Environmental Report

Thank you for consulting Historic Scotland on the Structure Plan Alteration and its accompanying Environmental Report. The purpose of this letter is twofold, firstly to provide a view on the plan itself and secondly to provide comments on the Environmental Report which accompanies the plan.

Historic Scotland is a consultee under the Town and Country Planning (Scotland) Act 1997 on behalf of Scottish Ministers. In that role we have now undertaken an appraisal of this plan, concentrating on its implications for nationally important elements of the historic environment. Our review of the Environmental Report is undertaken in our capacity as a Consultation Authority under the Environmental Assessment (Scotland) Act 2005.

As you will be aware, we have multiple roles in dealing with applications that the Structure Plan and subsequent Local Plans may generate. Any development which has a direct impact upon a scheduled monument requires scheduled monument consent (SMC) from the Scottish Ministers, which is applied for through Historic Scotland. This is in addition to planning permission. Development which may affect A-listed buildings or their setting, scheduled monuments or their setting and which may affect gardens and designed landscapes appearing in the Inventory requires to be referred to Historic Scotland under the General Development Procedure Order (GDPO). Proposals involving changes to Category A and B listed buildings and the demolition of Category C(S) listed buildings require to be referred to Historic Scotland on behalf of Scottish Ministers where your Authority is minded to grant listed building consent.

Responsibility for assessing alterations to Category C(S) listed buildings and development affecting the setting of B and C(S)-listed buildings lies with your Authority.

For the avoidance of doubt this response is set out in two parts: the first part provides our comments on the draft deposit plan, and the second part provides our comments on the Environmental Report.

1. PERTH & KINROSS STRUCTURE PLAN ALTERATION

We note that the alteration to the Structure Plan seeks to update the housing numbers arising from the recent projections and will set the broad spatial framework for where these will be located. While the alteration suggests how these can be distributed within each planning area, specific land allocations will ultimately be directed through local development plans.

We note that some policies will be altered within the plan to reflect this increase in housing requirements, however, we are content that at this strategic level historic environment interests are appropriately addressed through the criteria currently set out in Environment and Resources Policy 8.

We are therefore content that this alteration in itself raises no particular issues for our historic environment interests.

2. ENVIRONMENTAL REPORT

Historic Scotland received the Environmental Report that accompanies the Structure Plan from the Scottish Government's SEA Gateway on 22 December 2008.

The Environmental Report provides a clear overview of the environmental implications of the policies and settlement proposals included in the plan. We are content that the comments we provided on the Scoping Report in July 2008 have been taken into account during the preparation of the Environmental Report and welcome the summary on consultee responses in Appendix 6. We agree with the conclusions reached and have provided some detailed comments on the assessment in an annex to this letter.

None of the comments in part two of this letter should be taken as constituting legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity building in SEA.

We hope our comments have been helpful to you. If you wish to discuss any of the issues raised, please do not hesitate to contact me on 0131 668 8924 or at alasdair.mckenzie@scotland.gsi.gov.uk

Yours sincerely

Alasdair M^cKenzie
Strategic Environmental Assessment Team Leader

Cc.
Katrina McWilliam, Planning Officer, Perth & Kinross Council
SEA Gateway

Annex: Detailed comments on the Environmental Report

For ease of reference, the comments in this annex follow the same order as the Environmental Report.

Non-technical summary

1. The non technical summary provides a clear and concise overview of the assessment process and its outcomes.

Introduction and Context

2. These sections provide a clear overview of what has prompted the Structure Plan Alteration and how the population projections were determined. I welcome the information provided on how this alteration relates to the new planning system and how it is envisaged local planning will be taken forward in the future.

Relationship to Other Plans, Programmes or Strategies (PPS)

3. I welcome the inclusion of the SHEP¹ series, NPPG 5 and NPPG 18 within the review of other relevant PPS. Simply for information, the following policy document has recently been published:

Scottish Planning Policy 23: Planning and the Historic Environment (SPP 23).
<http://www.scotland.gov.uk/Publications/2008/10/28135841/0>

This policy statement supersedes and consolidates National Planning Policy Guidelines NPPG18: Planning and the Historic Environment and NPPG 5: Archaeology and Planning. It sets out the national planning policy for the historic environment and indicates how the planning system will contribute towards the delivery of Scottish Ministers' policies as set out in the current Scottish Historic Environment Policy (SHEP - available at <http://www.historic-scotland.gov.uk/shep.pdf>). Please note that SHEP supersedes the policy elements contained within *Passed to the Future* and you therefore may wish to remove this from your review.

Existing Environmental Problems & Issues

4. I welcome the information provided in this section and agree with the potential impacts identified for the historic environment that may arise from this alteration. The information provided in *Appendix 1: Environmental Baseline* is comprehensive.

¹ The SHEP was originally developed as a series of free-standing publications (SHEPs 1 to 5, published between 2006 and 2008). Now that the series is nearing completion Ministers have decided to publish it as a single document, reducing the amount of detail and duplication between the original publications. There have been no substantive changes to previously published policy on Scheduling, Scheduled Monument Consent, Gardens & designed Landscapes and Properties in the Care of Scottish Ministers). The consolidated SHEP also sees the publication of the final Ministerial policy on Listing and Listed Building Consent, which were consulted upon in 2007.

I note that some data gaps have been identified for the historic environment, such as the current status of scheduled monuments. Many scheduled monuments are stable and require little attention, but some will benefit from simple changes in landuse that will ensure no inadvertent damage. Others will benefit from more proactive management that will sometimes require access to specialist conservation skills.

Historic Scotland Monument Wardens visit scheduled sites and their owners on a regular basis. They check the condition of the site, offer advice on monument management and ensure that everyone with a current interest in the site knows about its protection. Owners, occupiers and land mangers can contact us for advice at any time. Our Monument Wardens create a record of the condition of the scheduled monuments, review and update this each time they visit.

5. I welcome the inclusion of planning application statistics in this section in relation to potential impacts upon the historic environment. Are these numbers based upon GDPO consultations triggered where there may be impacts upon the setting of Category A listed buildings and/or scheduled monuments?

Selection of Preferred Alternative

6. I welcome the clear outline of how alternatives were assessed as part of the plan development. I found the information provided in Appendix 2 very clear and largely agree with the conclusions reached. I would note that in some instances the proposed mitigation measures do not always specify the appropriate/sensitive re-use of listed buildings (e.g. page 72). As you will be aware, some features of the historic environment do not lend themselves to restoration and it is therefore important that any interventions are appropriate.
7. I welcome the inclusion of the commentary and the assumption on page 78, confirming that all elements of the historic environment were considered as part of the assessment.

Mitigation

8. I note that the assessment has highlighted the potential for negative impacts of development on the historic environment and, given the housing number increase set out in the alteration, agree with this conclusion. I welcome that a mitigation measure has been identified to address this, however, you may wish to alter this in light of the comments above regarding the restoration of buildings. In implementing the requirements of the Structure Plan we agree that the re-use of historic buildings would be beneficial, however it is important that any Local Plan policies acknowledge that these interventions should be sensitive and appropriate.
9. While new development may give rise to impacts upon the site and/or setting of historic environment features, existing Local Plan policies for the appropriate protection of these assets will mitigate this.

Monitoring

10. I welcome the information provided on how the alteration will be monitored and agree with the predicted effects for the historic environment. It would also be useful for the SEA Statement to indicate who will be responsible for both carrying mitigation through and monitoring the effects of the alteration on the environment. I note that the number of planning applications impacting on Gardens and Designed Landscapes will be monitored and welcome this. You may wish to include similar indicators for other historic environment features, such as:

SEA objective: Maintain, protect, and where appropriate enhance and restore historic buildings, archaeological sites and other culturally important features

indicator: number of scheduled monuments lost or significantly affected by proposals

indicator: number of listed buildings lost or significantly affected by proposals

indicator: number of archaeological sites lost or significantly affected by proposals

etc.