



HISTORIC SCOTLAND
ALBA AOSMHOR

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Dear Ms Robertson

Environmental Assessment (Scotland) Act 2005
Perth and Kinross Council – Placemaking Supplementary Guidance
Scoping Report

Thank you for consulting Historic Scotland on the scoping report for the environmental assessment of Perth and Kinross Council's Placemaking Supplementary Guidance, which was received by the Scottish Government's SEA Gateway on 24 June 2014.

I have reviewed the scoping report on behalf of Historic Scotland in its role as a Consultation Authority under the above Act (section 15). This letter contains the views of Historic Scotland on the scope and level of detail of the information to be included in the Environmental Report, and the duration of the proposed consultation period. Please note that our view is based on our main area of interest for the historic environment.

General Comments

I note that the historic environment is scoped into the assessment and I am content to agree with this. Overall, I am content with the approach outlined but would wish to offer the following detailed comments.

SEA Objectives and Indicators

I welcome the inclusion of an objective for the historic environment. At the screening stage it was noted that the guidance would likely have positive effects on the historic environment. In light of this it would be beneficial to include assessment criteria that bring out this information in the assessment. For example, will the Placemaking Guide result in the opportunity to enhance or improve the historic environment?

Alternatives and Assessment Methodology

Given that the Placemaking Guide is considered to be caught under section 5(3) of the act and a commitment has been made to prepare it as part of the LDP process, it is



unclear why it is considered that not having the Placemaking guidance is considered to be a reasonable alternative. In assessing alternatives, we would suggest that it would be more useful to consider the different content for the Placemaking Guide that will emerge during its preparation. e.g the level of prescription coming from it, or different design approaches/emphasis.

Thresholds for Assessing Impact

The approach to defining threshold criteria for potential impacts is welcomed. However, as you will be aware, the assessment of significance of impact on the historic environment is nuanced and can be dependent on a number of factors at a site specific level. In light of this it will be important for commentary to articulate the findings of the assessment.

Assessment of Cumulative Impact

I welcome the approach outlined here for the consideration of cumulative impacts.

Proposed Consultation

I am content to agree with the 6 weeks period of consultation on the placemaking guide and environmental report.

Relationship with other relevant plans, programmes and strategies

Simply as a small point of detail the Ancient Monuments & Archaeological Areas Act is 1979 not 1997 as reported.

I hope this is helpful. Should you wish to discuss any issue raised in this response please do not hesitate to contact me.

Yours sincerely

Andrew Stevenson
Senior Heritage Management Officer (SEA)