



PLANNING PERFORMANCE FRAMEWORK REPORT

2018-19



HISTORIC
ENVIRONMENT
SCOTLAND

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INTRODUCTION

This Report details the planning performance of Historic Environment Scotland (HES) from 1 April 2018 to 31 March 2019. It sets out our role in the planning system, and gives an update on our ongoing work to secure positive outcomes for the historic environment.

We have prepared the Report in line with the requirements of the 'Key Agencies Group Model' for the Planning Performance Framework Review Reports. It demonstrates how we have performed against the agreed Performance Markers for 2018-19, and describes our contribution to the planning system under the following themes:

- Place-making
- Capacity Building
- Service
- Service Improvements

The report gives both quantitative and qualitative evidence of our performance, which has been consistent with the high level set in previous years. We have continued to exceed all our target timescales for decision-making and consultation responses, and have continued our drive to improve the quality of our service.

We have two teams who lead our planning engagement role – Casework and Designations. Both teams sit within the Heritage Directorate. Our key aim is to promote consideration of the historic environment at all stages of the planning process. We support the delivery of high quality development all the way through the development management process.

Key areas of our work include:

- Producing historic environment policy and guidance
- Engaging with emerging development proposals
- Sitting on Design Review Panels
- Reviewing development proposals at application stage

We also promote high quality development by sponsoring awards and issuing grants for the conservation of historic assets and places.



ABOUT HISTORIC ENVIRONMENT SCOTLAND

We are a charity and public body leading the way in protecting, understanding and sharing Scotland's historic environment, for today and for the future.

What we do

- We look after internationally significant archives and artefacts.
- We are at the forefront of investigating and researching the historic environment and addressing the impacts of climate change on its future.
- We protect our historic places through designations and consents, promote their sustainable development, and provide millions of pounds each year to local communities to repair and revitalise their historic environment.
- We provide advice and guidance about the historic environment, and offer a wide range of training and learning opportunities.
- In every aspect of our work we strive to follow our five organisational values – we are collaborative, professional, innovative, open and respectful.

Our Corporate Plan, [Heritage for All](#), sets out our vision and priorities for 2019 onwards.

Our priorities

These are the five outcomes that we want to achieve and that will help us realise our vision:

1. The historic environment makes a real difference to people's lives.
2. The historic environment is looked after, protected and managed for the generations to come.
3. The historic environment makes a broader contribution to the economy of Scotland and its people.
4. The historic environment inspires a creative and vibrant Scotland.
5. The historic environment is cared for and championed by a high-performing organisation.

Our vision is that the historic environment is cherished, understood, shared and enjoyed with pride, by everyone.

What we do in the planning system

We are a large organisation with a vast range of skills and expertise, and a wide-ranging knowledge base. All of these can contribute to our role in the planning system, but it is our Heritage Directorate that leads on this process. This Report focuses on the work of our Casework and Designations Teams, which sit within the Heritage Directorate. These teams, in consultation with others when appropriate, carry out the majority of our planning related activities.

The aim of our work in the planning system is to inform and enable good decision-making, so that the historic environment of Scotland is valued and protected.

Our Designations Team makes and maintains lists of nationally important historic buildings, archaeological sites and monuments, gardens and designed landscapes and historic battlefields. They also advise Scottish Ministers on the designation of historic Marine Protected Areas.

Our Casework Team provides advice on the potential impacts of development on the historic environment. This advice is often linked to our statutory functions relating to various consenting processes. These include listed building consent and conservation area consent, and our role as decision-maker for scheduled monument consent. We are also a consultation body for planning applications, including developments requiring an Environmental Impact Assessment, and a Consultation Authority for Strategic Environmental Assessment.

Our decision-making

Decision-making processes are standardised across the Casework and Designations Teams, underpinned by a set of sign-off and quality control procedures. Our detailed schedule of governance for decision-making for designations and casework can be seen [here](#).

Our staff

The Casework and Designations Teams are specialists with knowledge of architectural history, archaeology, planning and environmental assessments. We employ 66 members of staff in the Casework and Designation Teams. The majority of these staff are senior officers.

The table below gives a detailed breakdown.

Casework Team	
Head of Casework	2
Deputy Head of Casework	8
Senior Casework Officer	20
Casework Officer	6
Field Officer	6
Graduate Trainee	1
Casework Technician*	4
Team total*	43
Designations Team	
Head of Designations	1
Deputy Head of Designations	3
Senior Designations Officer	6
Designations Officer	7
Designations Support Manager	1
Designations Support Officer	4
Designations Support Assistant	1
Team total	23
TOTAL*	66

*Casework Technicians sit within our Business Support team and are therefore not included in the team staffing totals

PERFORMANCE MARKERS

This report uses narrative, statistics and case studies to demonstrate how HES achieves positive outcomes in the historic environment against agreed performance markers. These are grouped under three broad headings: Place-making, Capacity Building and Service.

Place-making

A. Strategic planning

Participation in national and strategic plan making helps us to achieve shared outcomes. By contributing to these plans, we help to protect and conserve the historic environment for the enjoyment, enrichment and benefit of everyone, now and in the future.

We provide advice and information to support the development and delivery of a broad range of national plans, policies and strategies. This year, these have included city region and growth deals, emerging energy efficiency and climate change programmes, major roads projects, the Scottish Forestry Strategy and others across a wide range of sectors.

We have taken relevant plans, policies and strategies into account in our contributions to every stage of the planning process. This includes the preparation of development plans, our advice on development management decisions, and in developing our own policies and guidance in support of a plan-led system.

Historic Environment Scotland and Planning Reform

Throughout 2018-19, we have monitored the progress of the Planning (Scotland) Bill for our historic environment interests. We have provided the Scottish Government with drafting suggestions for emerging amendments and specific advice on whether they will improve the ongoing management of our heritage.

We have also considered the impact of the new legislation on our internal working processes, and are currently developing new working practices in advance of the new Planning Act. We continue to contribute to the review of the planning system and associated legislative workstreams through our involvement in the Key Agencies Group.

B. Development plan engagement

In our role as a Key Agency, we advise planning authorities at every stage of the development planning process. We play an active role in guiding development to the right places, and we promote the historic environment at the heart of place-making. We also offer advice to planning authorities on their development plan policies to ensure that our historic environment is given an appropriate level of protection within the planning system.

We are a consultation authority for Strategic Environmental Assessment (SEA), and approximately half of the SEA consultations we respond to relate to development planning. We advise planning authorities on the assessment and reporting of environmental effects resulting from their development plans. This helps to ensure that development is planned in a sustainable way and that potential effects on the historic environment are taken into account in the plan making process.

At an operational level, we support this engagement by having a co-ordinating case lead for each development plan and its accompanying SEA. This supports continuity of engagement and consultation throughout the process.

C. Development management

We are a statutory consultee for planning applications affecting historic environment assets of national importance, applications for listed building consent and applications for conservation area consent. We aim to provide planning authorities with comments setting out our view on an application within 14 days of being consulted – and achieve this target more than 90% of the time. Our comments are a material consideration in decision-making process, and an important part of our service.

We are a named consultation body for applications for planning permission that require Environmental Impact Assessment (EIA). We engage at an early stage of this process to ensure that potential significant impacts on the historic environment are identified and considered throughout. Where possible, we identify opportunities to mitigate significant impacts, and input to the iterative design process of developments. If relevant, we will also set out where we consider significant impacts unlikely, allowing for topics or specific impacts to be scoped out the process, which contributes to proportionate EIA.

Pre-application engagement

We continue to provide high quality advice at pre-application stages. Our aim is to identify potential historic environment issues, and to give certainty as early as possible in the process. We are routinely involved in discussions and site visits around emerging development proposals, and more than 15% of our planning caseload is pre-application advice.

We will always try to give the appropriate level of advice in order to secure the future of important historic environment assets for the benefit of communities and the local economy. Through early engagement, we are often able to recommend mitigation measures against adverse impacts to the historic environment.

CASE STUDY I

The Key Agencies Group: influencing the development of a new planning system

This year the Key Agencies Group (KAG) has monitored the progress of the Planning (Scotland) Bill through the Scottish Parliament. A key part of this was undertaking a joint review of the 'Stage 1 Report on the Planning (Scotland) Bill' (May 2018). The Group has also looked closely at the Stage 2 amendments to the Bill – identifying where changes to the emerging legislation may affect infrastructure delivery and environmental protections.

Through this process, KAG has been able to provide advice to the Scottish Government's Planning Bill team on the suggested drafting of further amendments. This included highlighting to MSPs proposed areas of reform where environmental protections might be weakened through changes to key elements of legislation.

The Group has also begun discussions on the preparation of the National Planning Framework 4. We look forward to collaborating on the development of this important planning document, and contributing to the creation of national policy for the sustainable and inclusive growth of Scotland's places.

CASE STUDY 2

Bunnahabhain Distillery, Islay

Over the past year, we have been involved in helping to manage significant changes to Bunnahabhain Distillery, a C listed 19th century whisky distillery complex on Islay.

Founded in 1881, Bunnahabhain evolved in a number of distinct phases in the late 19th and 20th century. The original distillery complex comprises of a U shaped courtyard building with warehouses either side. More warehouses were added in the early 20th century, and a housing estate, bonded warehouse, and filling stores were added in the 1960s.

Argyll and Bute Council consulted us on a listed building consent application for the demolition of several warehouses and alterations to remaining buildings. This was part of a major programme of redevelopment and regeneration. Because of the extent of demolition proposed, we visited the site and had an in depth discussion with the applicant.

The site visit helped us to understand why so much demolition was proposed, and how this would affect the experience and understanding of the site. It also helped us to understand the applicant's ambitions for the site. This included new facilities that are central to promoting the site as a successful visitor attraction – adopting the model of other distilleries on Islay.

It was clear that the majority of the warehouses proposed for demolition were in very poor condition. They were suffering from significant structural movement, and a historic lack of maintenance and repair. We normally expect a listed building to be marketed openly before its loss is accepted, but in this case, we agreed with the applicant that marketing the earlier 20th century warehouses wouldn't be practicable.

One of the warehouses proposed for demolition was quite different from the others. It was in much better condition, and had a clear and immediate relationship with the main block. Because of its positive contribution to the overall composition of the site, we recommended that the applicant should keep it. Our advice was taken on board and Warehouse 4 was omitted from the proposed demolitions.

We welcome the significant reinvestment in this site, particularly the conservation works proposed to the retained courtyard building. We worked with the applicant to refine the proposals so that the historic interest and special character of this historic industrial complex is retained. We also worked with colleagues in our Survey and Recording team, who have recorded the site before the changes.



Consenting

We are the consent-giving authority for scheduled monument consent (SMC). Determining applications for SMC in a reasonable timescale can make a huge difference to the management of these nationally important sites. This is particularly important where timescales can influence opportunities for funding, or where works can only be done at certain times of year. For monuments that are also visitor attractions, the consenting process can affect the accessibility and experience of the historic site.

Through this process, we aim to ensure the long-term protection of scheduled monuments wherever possible. Historic assets can be complex and sometimes minor changes can affect their cultural significance. To get the best outcomes we work with many partners from different disciplines and sectors. In some cases these partnerships will last many years, as we work together to find long-term, sustainable outcomes for the historic places that we value.

CASE STUDY 3

Caisteal Bharraich, Highland

Caisteal Bharraich stands on the summit of a promontory high above the Kyle of Tongue. Despite its small size, it is an important landmark in Tongue. Although the castle appears to have changed little since it was abandoned more than 300 years ago, its condition has deteriorated in recent years.

We started to work with the landowner on a scheme to repair and consolidate the castle after a winter storm in 2015 led to a significant collapse of the east wall. We helped the landowner work through an application for a complicated and detailed scheme of works to enhance access to the Castle. This involved installing a modern steel staircase. We also provided financial support through our Historic Environment Repair Scheme.

Tongue School pupils have embedded a time capsule into the rebuilt section of the east wall. The capsule contains a variety of photos of artefacts from the school, drawings and letters relating to the local area, school life and the children's predictions for the future.



The Cabinet Secretary for Culture, Tourism and External Affairs, Fiona Hyslop MSP officially re opened the castle on 11 May 2018. She commended the project partners and highlighted the opportunities afforded by the site as an important local landmark and boost for tourism along the North Coast 500 route.

We are delighted that this nationally important site has been preserved for generations to come. The improved access to the castle also has wider public benefits. Visitors had previously only been able to access the ground level of the castle. Due to the installation of the staircase, they can now reach its upper levels and enjoy the spectacular views out over the surrounding landscape.

CASE STUDY 4

Caisteal Maol, Skye

Caisteal Maol is a medieval tower house dating from the 15th century. It sits on a rocky coastal knoll commanding the strait of Kyle Akin that lies between Skye and the mainland. The ruin's strategic position is prominent on arrival in Kyleakin and when crossing the Skye Bridge. The ruin is valued widely for its romantic appearance and as a place to visit, by both locals and visitors.

In spring 2018, the castle was struck by lightning for the third time in a century. When part of the ruin then collapsed, we worked closely with the landowners, the Highland Council to handle the situation.

We worked with the Council to secure the monument, manage press enquiries and public expectations, devise a scheme of consolidation, and source funding for the proposed works. We held significant pre application discussions about this scheme. Thanks to this process we were able to grant scheduled monument consent for masonry consolidation of the north wall of the castle and installation of a lightning conductor.

This case involved creative approaches to funding, upskilling a project delivery team within the Council, and the logistical challenges of working on a hard to access site. The works were completed in autumn 2018, and the monument is now stable and safe for visitors to enjoy.



Capacity building

D. Sharing good practice, skills and knowledge

We work with colleagues across the planning and development sector to promote the historic environment and share skills, knowledge and good practice. We respond to Scottish Government consultations, and sit on a number of national groups. These include the Heads of Planning Group, the Royal Town Planning Institute, the Key Agencies Group, and the BEFS historic environment working group.

Throughout this year we have also participated in a range of partnership projects with key stakeholders, local communities and communities of interest. These projects have provided opportunities for sharing knowledge and expertise in dealing with historic environment issues.

In particular, this year saw the completion of the four-year Inner Forth Landscape Initiative (IFLI) and the commencement of a new legacy project – Inner Forth Futures. The landscape partnership scheme has involved a range of stakeholders, and we have taken the lead on projects involving extensive repairs of two privately-owned scheduled monuments: Charlestown Limekilns in Fife and Kennetpans Distillery in Clackmannanshire.

In our commitment to sharing good practice across the sector, we regularly engage in training activities. During 2018-19, we facilitated and contributed to various planning skills events. This included:

- an Environmental Impact Assessment workshop
- Strategic Environmental Assessment training for Responsible Authority and Consultation Authority staff
- listed building consent and scheduled monument consent CPD for local planning authority staff

Policy and guidance

One of the ways we build capacity and share good practice across the sector is ensuring that our key policy and guidance documents are up to date and fit for purpose..

This year, we launched the new [Historic Environment Policy for Scotland](#) (HEPS). HEPS is HES's first strategic policy for the whole of the historic environment. It is a material consideration for all types of decision-making – including planning permission, listed building consent and scheduled monument consent.

HEPS is designed to encourage transparency in decision-making. The document is written in clear and accessible language, with key terms defined at the outset. It also distinguishes between policy and guidance in a way that previous historic environment policy documents did not.

HEPS is supported by our operational information and suite of guidance notes, and these have also been revised to reflect the new policy, and to make them more accessible. These key documents clearly set out how the historic environment should be considered in decision-making. All the documents are available via [the HEPS page on our website](#) and include:

- Designation Policy and Selection Guidance
- Scheduled Monument Consents Policy
- Managing Change in the Historic Environment: The Use and Adaptation of Listed Buildings
- Managing Change in the Historic Environment: Demolition of Listed Buildings
- Guidance on Conservation Areas (interim)
- Guidance on the Principles of Listed Building Consent (interim)
- Historic Environment Circular

We have also collaborated with SNH to support introduction of a revised [Environmental Impact Assessment Handbook](#).

CASE STUDY 5

The new Historic Environment Policy for Scotland (HEPS)

Throughout 2018 19, we worked to deliver the final phases of our project to review and replace the Historic Environment Scotland Policy Statement. The new [Historic Environment Policy for Scotland \(HEPS\)](#) was launched on 5 April 2019, and formally adopted on the 1 May.

HEPS is our first strategic policy document for the historic environment. It supports and enables good decision making for changes to the historic environment. It presents a fresh approach to our heritage which takes into account all aspects of the historic environment and the different ways people value it. Its outlook is inclusive and it seeks to acknowledge the challenges facing those who take decisions on the historic environment every day.

After the initial stages of our [What's Your Heritage? Project](#), which we reported on in last year's report, we realised that we had a unique opportunity to take a fundamental look at how Scotland's Historic Environment is looked after, recognised and valued. We wanted to make it clear that we are open to new ways of working, and responsive to emerging priorities for our heritage.

From the earliest stages, we invited collaboration from stakeholders and decision makers for the historic environment. This helped us to evaluate new approaches and determine what a new policy would look like. This allowed us to have an ongoing and active dialogue with future users of the new policy, to shape the approach at every step of the process.

HEPS is underpinned by a series of principles and policies for the recognition, care and sustainable management of the historic environment. The policy requires decision makers across the planning system to develop an inclusive understanding of the breadth and cultural significance of the historic environment. It also promotes the protection and enhancement of the historic environment as part of plan making and decisions on future development.

The new policy will encourage greater participation in decisions that affect people's most valued places, and seek to sustain the historic environment at the heart of communities and places.

We have supported the introduction of HEPS in a number of ways. Detailed information on the new policy documents and how they should be used is available [on our website](#). We provided the Heads of Planning Scotland (HOPS) group with detailed information including a set of FAQs.

After launching the policy, we hosted a Webinar in collaboration with the Improvement Service on how the policy was developed, and how it should be used. This platform allowed us to reach planning and heritage professionals across the country, and answer their questions. This Webinar is now available for viewing on the Partners in Planning Website.

We have planned a programme of workshops and engagement with planning authorities in support of the implementation of the policy. In the next year we will continue in our key agency role supporting planning authorities as they implement HEPS through the preparation of development plans and the formation of their own historic environment policies.

HEPS has the potential play an important role in supporting the ongoing review of the Scottish Planning System. In particular, we consider that HEPS will inform the development of new planning policies for the historic environment to be included in National Planning Framework 4. We believe the new policy will align positively with the emerging legislation included within the Planning (Scotland) Bill.

Key Agencies Group

We currently chair the [Key Agencies Group](#) (KAG). As one of the public bodies that make up the group, an important part of our role in the planning system is to work together to share information and support decision-making.

This year KAG has closely engaged with the on-going reforms to the Scottish planning system. The Group has worked together to influence and monitor the progress of the Planning (Scotland) Bill through the Scottish Parliament. We have also collaborated on key initiatives to support the culture change and improved joint-working required as part of the ongoing reforms.

Graduate programme

We are actively engaged in helping to develop careers in planning and the historic environment. We continue to run our graduate programme, inviting recent graduates to work with us for a year to gain knowledge and experience in the sector. We currently have a graduate in post. We also mentored a town planning student from the University of Dundee in the first quarter of 2019.

CASE STUDY 6

A revised handbook for Environmental Impact Assessment practitioners

As a consultation body for Environmental Impact Assessment (EIA), we offer advice to decision makers on the quality of assessments, and methods they have used. We have never had published guidance for this topic, but Scottish Natural Heritage SNH has a published EIA Handbook for practitioners.

In 2017 the revised European Directive on EIA was transposed into Scots Law. SNH decided to update the EIA Handbook to reflect the changes. This gave us the opportunity to get involved and fill the gap in our guidance. We jointly funded the update with SNH, and the updated Handbook now covers cultural heritage as well as natural heritage, reflecting the multi disciplinary nature of EIA.

The updated Handbook also has a new technical appendix setting for cultural heritage impact assessment. This sets out how to assess the impact of development on the historic environment. It focusses on assessing impacts on cultural significance, in line with the wording of the principles in the Historic Environment Policy for Scotland.

The revised EIA handbook was published in May 2018 and has received positive feedback. We promoted the EIA handbook and the new technical appendix at Scotland's EIA Community Conference 2018, and also delivered a workshop on cultural heritage impact assessment. We have also promoted the Handbook through links in our consultation responses. The project demonstrates how collaborative working between Key Agencies can successfully support sharing good practice, skills and knowledge across the planning sector.

CASE STUDY 7

The Key Agencies Group: working together to share good practice, skills and knowledge

The Key Agencies Group (KAG) has been active in promoting culture change and collaborative working across the planning system. As a KAG member, we have been involved in a number of initiatives to share information, build capacity and encourage improvements across the planning system.

Place Making

The Key Agencies sub group on Place making has been assessing how greater collaboration at an earlier stage of masterplanning might deliver increased positive outcomes for our shared objectives in placemaking. One form this collaboration might take is providing support from relevant agencies via facilitated 'place' workshops, before the mandatory pre application process associated with a planning application.

Partners in Planning

KAG is pleased to contribute to the 'Partners in Planning' initiative, which aims to develop skills and build capacity across the planning system. Collectively, members of KAG have shared information, experience and best practice onto the Partners in Planning web portal. This website acts as a single access point to the variety of knowledge and skills resources required by planners.

At the launch event for the Partners in Planning web portal in September 2018, KAG delivered a marketplace session on 'Engaging the Key Agencies' to promote the benefits of early engagement on complex development projects. This involved preparing a short film and joint presentation on the role of the Key Agencies in the planning system. The Group also facilitated an active learning workshop for participants.

Key Agencies Conference

The first Key Agencies Conference, 'Planning for Positive Outcomes - Working with the Key Agencies', was held at the Engine Shed in Stirling in January 2019. The event promoted collaboration and constructive dialogue between planners and the Key Agencies. Each agency gave an overview of their role in the planning system and explained to participants the best way to work with them to maximise the benefits.

Guest speakers from planning authorities, the development industry and other planning partners illustrated collaborative working through case study examples. An update on the progress of the Planning (Scotland) Bill was also provided by the RTPI. The afternoon consisted of workshop sessions allowing attendees to consider real life case studies involving the Key Agencies. The event was well received by over 90 attendees and we hope to continue our participation in training events and conferences moving forward.



E. Evidence and data-sharing

Community planning

Our Casework team's involvement in spatial planning, place-making and community planning partnerships has continued to inform our emerging approach to community planning. This year we undertook an audit of the first round of Local Outcome Improvement Plans and have worked with colleagues to identify emerging opportunities for engagement with community planning.

We have undertaken research on the implementation of local level spatial planning across planning systems in the UK and internationally. Our aim is to understand better where conservation-led approaches have informed local level spatial plans and where they have been used to recognise locally important heritage assets. The outputs from this research and subsequent working group discussions on local level spatial planning will assist PAS with their emerging research on Local Place Plans.

Heritage crime

We have enforcement powers in relation to unauthorised works to scheduled monuments under the [Ancient Monuments and Archaeological Areas Act 1979](#). As part of this role, we have been working with the Scottish Heritage Crime Group (SHCG) to standardise heritage crime recording. The group was officially launched in April 2018 and brings together representatives from HES, Police Scotland, Treasure Trove, City of Edinburgh Council and the Association of Planning Enforcement Officers.

The group will work collaboratively to reduce the damage, impact and cost of heritage crime throughout Scotland. Its focus is raising awareness of the impacts of criminal damage and strengthening information-sharing between partners. Crimestoppers has also launched a campaign in partnership with the SHCG, encouraging members of the public to speak up anonymously about damage to Scotland's historic buildings and monuments.

We are also working to raise awareness of heritage crime, and recently hosted a 'Partner Agency Awareness' event with police officers at Edinburgh Castle. We also attended a 'Partner Agencies Investigators Course' at the Scottish Police College.



CASE STUDY 8

The Key Agencies Group: working together on evidence and data sharing

The Key Agencies Group (KAG) has been working to improve and collaborate on data and evidence sharing.

Environmental evidence

A KAG sub group has been working with other environment agencies, environmental research bodies and planning authorities to explore how the data we all hold can be used better in the development planning process.

Since May 2018, the Group has been working alongside 8 Local Development Plan teams to develop in depth user research through user stories, user interviews and focused workshop discussions, in three key areas:

- Identifying a wider suite of environmental information potentially relevant for Local Development Plan preparation
- Improving the cascade of information from LDPs into other areas of the planning and environmental assessment processes
- Developing and improving user guidance specific to planning

This suite of data will have the potential to inform the preparation of Local Development Plan Evidence Reports under the new Planning System. The sub group has therefore been working collaboratively with the Scottish Government's Digital Task Force on the development of digital platforms for this information. We have also been exploring how this approach to environmental evidence might support the Vacant and Derelict Land Project led by SEPA and The Scottish Land Commission.

This project has led us to consider what additional data HES holds that may be helpful to this process, and whether further user guidance might make our current datasets more useful in some instances.

Performance Reporting

In June 2018, the Key Agencies carried out a Peer Review exercise. The Group considered each other's Planning Performance Framework Reports and discussed examples of good practice across the Scottish planning system, identified key trends and highlighted potential improvements. The findings of the Peer Review exercise formed the content of a 'Key Agencies Statement on Performance: 2017/18'. This statement has been used to inform subsequent discussions on the performance of the planning system with the Scottish Government.



Service

F. Decision making timescales

Our headline indicators for 2018-19 are consistent with previous years, showing a high level of service across all our planning engagement roles. These cover our timescales for decision making and consultation responses across the following areas:

- Development planning
- Strategic Environmental Assessment
- Development management
- Listed building and conservation area consent
- Scheduled monument consent and enforcement

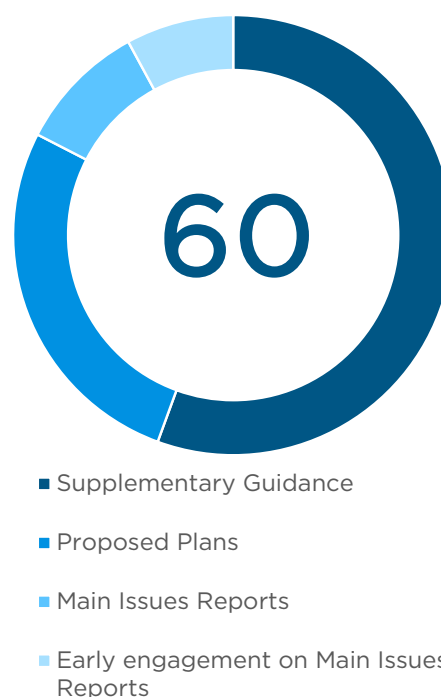
We have also used this section to report on our other main activities associated with the planning process. This covers:

- Designations
- Complaints handling
- Field officer programme

Development planning

During 2018-19, we received **60 development plan related consultations**. We have seen a small decrease in this type of consultation this year, which is likely to correspond to the stage that many planning authorities are at in their plan cycle. Just over half of these related to Supplementary Guidance, and this remains the largest single consultation type. This year, we responded to **98%** of statutory development plan consultations within the required timescales, with one consultation response out of 60 missing the deadline.

Development Planning Consultations

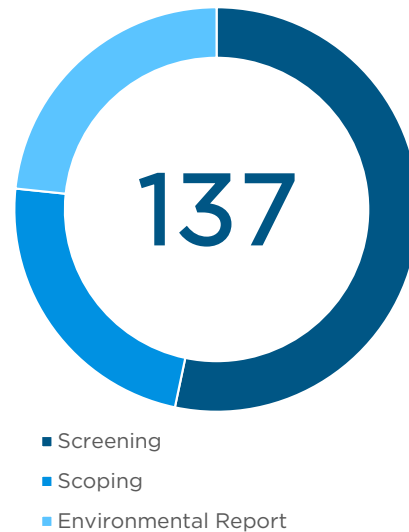


Development Planning Casework			
Consultation Type	2018-19	2017-18	2016-17
Early engagement on Main Issues Reports	5	14	9
Main Issues Reports	6	10	9
Proposed Plans (including drafts, further information requests, and action programmes)	17	15	9
Supplementary Guidance	32	39	36
Total	60	78	63
Percentage statutory development plan consultations within the required timescale	98%	100%	100%

Strategic Environmental Assessment

During 2018-19 we received 137 Strategic Environmental Assessment (SEA) consultations, and we responded to all of these consultations within the required timescales. 45% of the SEA consultations related to Local Development Plans and Strategic Development Plans.

Strategic Environmental Assessment consultations



SEA consultations							
Consultation type	Target (days)	2018-19		2017-18		2016-17	
Screening report	28	73	100%	89	100%	76	100%
Scoping report	35	32	100%	25	100%	36	100%
Environmental report	As agreed (typically 6 weeks)	32	100%	30	100%	40	100%
Total		137	100%	144	100%	152	100%

Development management

Our development management headline indicators reflect our response timescales for the following consultation types:

- Planning applications
- Planning applications accompanied by Environmental Impact Assessments
- Listed building consent
- Conservation area consent

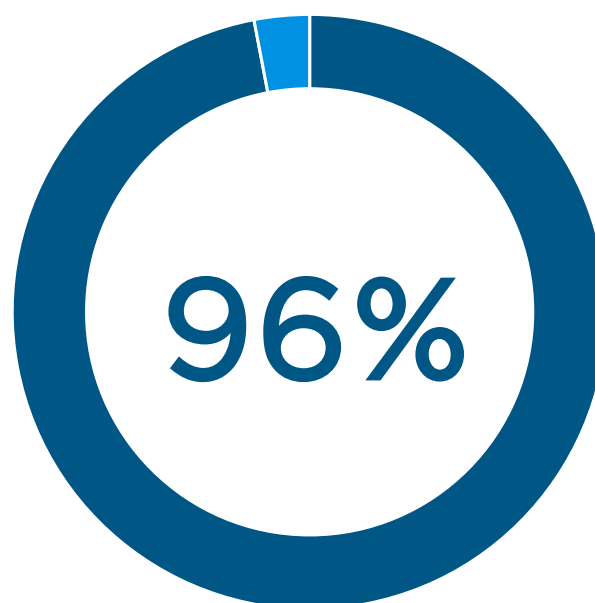
In 2018-19 we were consulted on 911 statutory planning applications, 8% of which were accompanied by an Environmental Impact Assessment. We were consulted on 2823 statutory listed building and conservation area consents.

We provided pre-application advice on 364 cases affecting historic environment assets. We objected to 42 applications for consent – 30 for planning permission, four for conservation area consent, and eight for listed building consent.

The table below gives a break down of our consultation response timescales. We maintained a high level of service in all development management cases through 2018-19, responding to 96% (3717 out of 3852 cases) of consultations within agreed timescales.

Our response times are still significantly above target percentages. There has been a minimal downward trend over the past three reporting years, which is likely to reflect natural variation. As the actual percentage remains substantially above target, no action is currently needed.

Consultation responses within agreed timescale



Development management consultations					
Consultation type	Agreed timescale (days)	Target percentage	Actual percentage		
			2018-19	2017-18	2016-17
Planning applications	14	90%	95%	96%	97%
Planning applications with Environmental Impact Assessment	30 (or as otherwise agreed)	90%	97%	100%	100%
Listed Building Consent and Conservation Area Consent Consultations	14	90%	97%	99%	99%
All consultations			96%	98%	99%

Scheduled monument consent

Through the scheduled monument consent (SMC) process, we aim to ensure the long-term protection of scheduled monuments wherever possible. Works on scheduled monuments, including repairs, require scheduled monument consent.

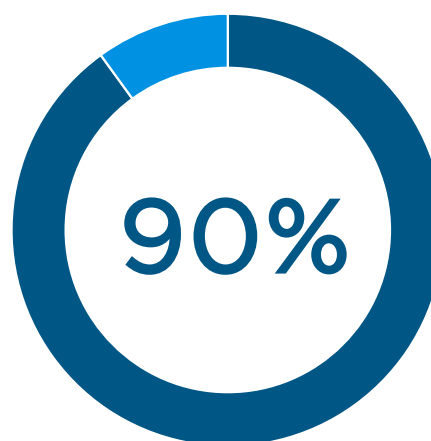
Crown bodies (government department or agencies) are not required to apply for scheduled monument consent. Instead, these bodies apply to us for scheduled monument clearance.

Section 42 Consents relate to the use of any equipment capable of detecting metal or minerals on scheduled monuments. This includes metal detectors, magnetometry / gradiometer surveys and ground penetrating radar.

In 2018-19, we handled 296 applications for scheduled monument consent, scheduled monument clearance and Section 42 Consent. We determined 90% of these within 8 weeks, which meets our target.

All our SMC decisions are published through our [online portal](#). [The Historic Environment Scotland Act 2014](#) introduced a right of appeal against SMC decisions. None of our decisions have yet been subject to appeal.

SMC decisions within 8 weeks



Scheduled Monument Consent						
	Agreed timescale	Target percentage	2018-19		2017-18	
Scheduled monument consent applications	8 weeks	90%	259	88%	#*	#*
Scheduled monument clearance applications	8 weeks	90%	9	100%	#*	#*
Section 42 consent	8 weeks	90%	28	100%	#*	#*
Total			296	90%	235	93%

* # denotes that this data set was not reported in the year indicated

We conduct enforcement casework where unauthorised works on scheduled monuments are reported to us. We use varied approaches to resolve these issues.

Scheduled Monuments: Unauthorised Works Cases

	2018-19	2017-18
Cases resolved	137	73

Designations

Accurate and up to date designations records are key to understanding heritage assets and giving them appropriate weight in the planning process.

We currently hold over 55, 000 designation records. These cover listed buildings, scheduled monuments, gardens and designed landscapes, and battlefields. This year, we made 2377 designation decisions. This includes decisions to designate, amend and de-designate, as well as decisions not to designate.

We designate new assets every year, and remove assets from our records where they no longer meet the standard to be designated. A significant number of removals from the schedule or the list reflect where a site or building was previously both a listed building and a scheduled monument. In these cases we review the asset, and decide which designation is most appropriate for it.

There is a right of appeal against both scheduling and listing. Two appeals were submitted this year, both against listing. Both of the appeals were dismissed.

Statutory amendments are material changes to designations. These alter what is designated. For scheduled monuments, this is a change to the description of the scheduled area, or the map that accompanies this. For listed buildings, this is a change to the address identified in the listing.

Minor record changes are updates of online information. These cases reflect ongoing maintenance of our designation records.

The table below sets out the amendments made to scheduled monuments, listed buildings and gardens and designed landscapes records. There have been no changes to the battlefield Inventory or Historic Protected Marine Areas this year.

Scheduled monument designations	2018-19	2017 18	2016-17
New designations	26	18	41
Changes to existing designations:			
Statutory amendments	50	53	112
Minor record changes	638	246	#*
De-designations (removal from schedule)	22	44	60
Appeals against scheduling	0	0	#*
Listed buildings	2018-19	2017 18	2016-17
New designations	14	42	39
Changes to existing designations:			
Statutory amendments	91	84	149
Minor record changes	762	313	#*
De-designations (removal from list)	71	155	249
Appeals against listing	2	5	0
Gardens and designed landscapes	2018-19	2017 18	2016-17
New designations	2	#*	#*
Changes to existing designations	3	6	#*
De-designations (removal from Inventory)	2	#*	#*
Total number of designation decisions (in cluding all designations and other work not mentioned above)	2377	1369	1111

* # denotes that this data set was not re-
ported in the year indicated

Complaints handling

We received 12 formal complaints, two of which were handled under stage 1 (frontline resolution) and 10 of which were handled under stage 2 (investigation) of our complaints handling procedure. All but one were responded to within the timescales set out in the procedure. Four complaints were upheld, five were not upheld and three were partially upheld.

We received 30 information requests, 29 under the Environmental Information (Scotland) Regulations 2004 and one under the Freedom of Information (Scotland) Act 2002. Of these the information was released for 11, partially released for 14, withheld for two and not held for three.

Our guidance on complaints handling procedures is on our website [here](#).

Field officer programme

Historic Environment Scotland's field officers are based across the country and are able to provide advice and information to owners and land managers about how to care for scheduled monuments.

The field officers conduct regular condition monitoring visits. Their visits are weighted towards sites that were in less good condition when last visited. During 2018-19, they monitored the condition of 730 monuments across Scotland, with 86% of those monuments reported to be in optimal or satisfactory condition.



G. SERVICE STATEMENTS AND JOINT WORKING AGREEMENTS

Key Agencies Statement on Pre-application

HES is part of the Scottish Government Key Agencies Group, all members of which engage closely with the planning system. Various agreements have been put in place in recent years to help us work closely with one another on planning issues. In 2018, the Key Agencies worked together to produce an updated [Joint Statement on pre-application](#).

This joint statement sets out the principles governing the Key Agencies' commitment to effective and timely pre-application engagement with planning authorities and developers in relation to developments of national and major significance. The benefits of early engagement are a key feature of Scottish Government's Planning System. Effective early engagement allows for more transparent planning and decision-making processes and early identification of issues. The updated joint statement re-affirms how the Key Agencies will help to meet the ambitions for an efficient, inclusive Scottish planning system.

Planning Service Standards Statement

In April 2018, we published our new Planning Service Standards document which outlines how we engage in the planning system.

The service statement applies to our involvement in the planning system and other regulatory systems relevant to land and sea. This includes our role in providing advice on applications under the [Electricity Act](#) and licenses under the [Marine \(Scotland\) Act](#).

The service statement sets out:

- our vision and objectives in engaging in planning
- our role in the planning system
- the basis of our advice
- the detail of how we engage at different stages of planning and plan-making processes

The statement sets out our consultation timescales for our regulatory and advisory roles in planning and other consents. It also provides a checklist setting out when to consult us.

The Planning Service Standard can be seen [here](#).

H. ENGAGEMENT WITH SERVICE USERS

Public engagement in our decision making

We have been working to enhance the ways in which the public can engage with our designations decision-making. Over the period 2018-19, we have worked towards enabling all our consultation reports of handling for designations to be published on our Heritage Portal. This will allow people to give their views on proposed designations during the normal consultation period.

From April to October 2018, we worked with Historic Assynt, a community heritage group, to deliver a collaborative project to consider a large number of archaeological sites for designation.

CASE STUDY 9

Assynt Cairns Project

In 2018 19, our Designations Team assessed over 40 of Assynt's most notable prehistoric burial monuments for designation. This was a collaborative designations project with [Historic Assynt](#). The community heritage group had already done significant amount of work investigating the archaeological character of the Assynt area. This research was published in partnership with the archaeological contractor AOC Ltd, and formed the starting point of our project.

Designation projects such as the Assynt Cairns Project can need significant resource allocation, and often take up to a year to plan, implement and complete. This means they need to be weighed up carefully against other team priorities.

Our first step was to engage directly with Historic Assynt to understand more about their request. The team then made an initial sift of 57 Neolithic and Bronze Age burial cairns for a desk based assessment.

The team also identified some existing scheduled monuments in the immediate area whose designation documentation could be improved. This work might include updating existing legal descriptions, maps and supporting information. While this meant fitting more work into an already short week of visits, it contributed to the wider work of the team.

The desk based sift produced a list of 43 monuments to visit. Records for these sites were compiled to inform the field work. The records combined the [Highland Council Historic Environment Record](#), Historic Assynt's own records and information from our [National Record for the Historic Environment](#).

Following the site visits, we decided which monuments should be proposed for scheduling, and consulted on these with land owners and interested parties.

We are grateful to the Historic Assynt community heritage group for highlighting these sites in the first place, and for the help they gave us throughout the planning and fieldwork stages. Survey and Recording colleagues at HES also provided advice, comment and technical assistance during the project.

The project has secured a far better representation for Neolithic and Bronze Age burials in the [nationwide schedule of monuments of national importance](#). This will help to support the appropriate management of change to those sites and their settings. The review of documentation for existing scheduled monuments will give increased clarity for those using them to manage change.



Engagement on policy and guidance development

The development, launch and adoption of HEPS has been a key work stream for our Designations and Casework teams this year, and we took an open, responsive approach to developing the policy. We invited collaboration from stakeholders and decision-makers for the historic environment in the development of the new document.

As the policy was drafted we engaged with local authorities, academic and research institutions, planners and the development industries as well as the wider heritage sector. This took the form of workshops, content development and peer review, as well as formal public consultation. This allowed us to have an ongoing and active dialogue with future users of the new policy, to shape the approach at every step of the process. The feedback we received will also help to inform the prioritisation and approach to policy and guidance development in the future. More information on the HEPS project can be found in Case Study 5.

Customer Satisfaction Survey

We recently carried out a customer survey, inviting those who engage with us in planning to tell us how we are doing, what we do well and what we could do better. More information on this can be found in Case Study 10.

Engagement in Design Review Panels

We regularly participate on panels to review and offer advice on design options. We aim to support good development and achieve positive outcomes for the historic environment where possible.

This includes:

- attending Local Authority-led design panels
- participating in the Local Authority Urban Design Forum
- contributing to Architecture and Design Scotland's review panels and workshops

Sponsorship of Awards

We sit on the judging panel of the Royal Incorporation of Architects in Scotland (RIAS) awards, and sponsor the Historic Environment Scotland Award for Conservation and Climate Change.



CASE STUDY 10

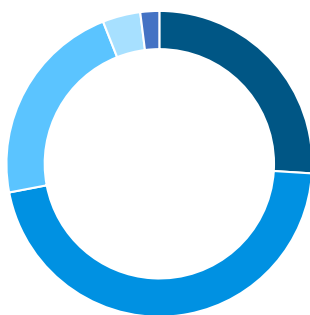
Customer Service Survey

At the end of this reporting year, we carried out an online customer survey. We invited our stakeholders to tell us how well we are performing our role in the planning system.

The survey asked questions about our advice, our policy and guidance documents, and the service we provide. We received responses from a broad range of stakeholders, including amenity bodies, government officials, planning officers, applicants / agents, consultants, and members of the public.

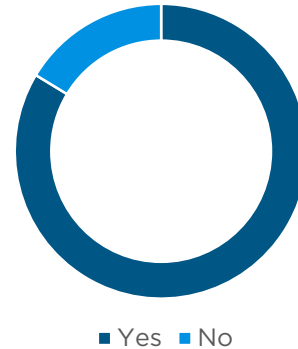
The feedback was broadly positive, and will help us to identify service improvements over the coming year. These charts show how stakeholders responded to some of the key questions we asked.

HES advice contributes to the creation of better places



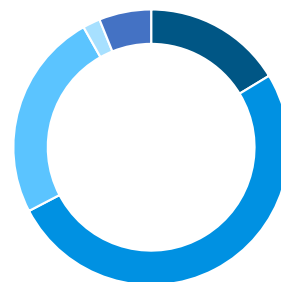
Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

Are you aware of the new Historic Environment Policy for Scotland (HEPS)?



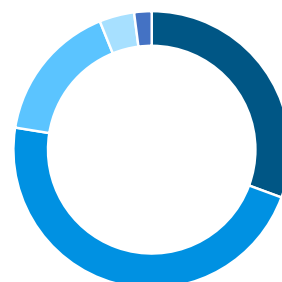
■ Yes ■ No

HES is willing to engage at an early stage



Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

HES helps decision-makers understand the impact of development on the historic environment



Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disagree

CASE STUDY II

Our Kirkwall, Our Heritage: Delivering a partnership project with young people in Kirkwall

As part of the Year of Young People in 2018, we wanted to engage more with a younger audience than we normally do on planning issues. We wanted to understand what was important to them, and what implications that might have for both our work and that of local authorities. Orkney Islands Council (OIC) planners were keen to come together with partners at HES to learn more about which historic spaces and places were valued by the younger generation – to understand better how to plan for their future.

HES and OIC jointly commissioned PAS to deliver a community consultation project in Kirkwall that built on earlier consultations. The project aimed to encourage new and alternative thinking about which types of places should be recognised in the future, and to capture how these places can be valued and potentially incorporated into development plans.

The ‘Your Heritage Kirkwall’ workshops, delivered by PAS, contained a set of fun, engaging activities to encourage discussions around heritage. We asked a group of 20 students of varying ages ‘When you think about Kirkwall, which places and buildings are important to you? Which ones make you feel proud and have special meaning for your community?’ We also asked the students about how they would like to acknowledge, celebrate and protect the places that they identified.

The young people in Kirkwall gave us some very useful insights into their thinking processes around local places that matter to them. They were not interested in the usual characteristics that typify a protected site, such as the fabric of a building, who built it, or even the rarity of the place.

Instead, they were concerned with identifying how they could convey the story of the place. They were interested in sharing this within their community, but also with visitors who might otherwise walk past and not realise that what they were seeing was of tremendous local importance.

This led to discussions around the possibilities of commemorative plaques, the creation of site records in the HES website Canmore, and video recordings being added to archival collections, as a way of starting to capture and record the places of local value.

The project highlighted the vision and enthusiasm that younger people display when they are truly listened to and given a voice. The Planning Department at OIC intends to strengthen further the bonds that are developing with the leaders of tomorrow, and our future planners, in order to continue to work closely with them to preserve what they hold dear and to plan for the future of their neighbourhoods.

The project outcomes are reflected in the recently adopted Historic Environment Policy for Scotland, which recognises that heritage goes beyond national designations and that communities should be given a voice.



DELIVERY OF OUR SERVICE IMPROVEMENT ACTIONS IN 2017-18

	Service improvement action	Was the service improvement achieved?
1	Use the outcomes of discussions with the Heritage Sector to draft a new Historic Environment Policy Statement.	Yes. The new Historic Environment Policy for Scotland (HEPS) was launched on 5 April 2019, and formally adopted on 1 May 2019. See Case Study 5 to find out more.
2	Publish guidance for community groups on the positive reuse of historic buildings.	Yes. The Managing Change guidance note on Use and Adaptation of Listed Buildings was launched on 5 April 2019, and formally adopted on 1 May 2019.
3	Implement SEA research recommendations 2016-17 and influence development of new planning system.	Yes. This work has been ongoing throughout the year, and will continue as the planning reform agenda and the new Planning Bill progress. See Case Study 1 to find out more.
4	Continue to work with Key Agencies on the implementation of the Planning Bill.	Yes. This work has been ongoing throughout the year, and will continue as the planning reform agenda and the new Planning Bill progress. See Case Study 1 to find out more.
5	Provide training / workshops on Environmental Impact Assessment (EIA) to practitioners within Key Agencies and staff new to the discipline in conjunction with SNH and SEPA.	Yes. We have provided EIA training at several events over the year. See Case Study 6 to find out more.
6	Review working arrangements with local authorities to identify more efficient and effective practice.	No. This service improvement has been postponed, as we consider that this is best done following implementation of the new Planning Bill. This action will be carried forward into 2019-20.
7	Review available guidance for planners, identify gaps, and develop long-term programme of new guidance.	Yes. A key outcome of the HEPS project has been the development of a programme of work which sets the framework for the prioritisation, preparation and publication of topic specific guidance.
8	Support introduction of new EIA handbook to colleagues across the planning sector.	Yes. The revised EIA handbook was published in May 2018. HES promoted the EIA handbook and the new technical appendix at Scotland's EIA Community Conference 2018. See Case Study 6 to find out more.
9	Scope / implement mechanism for public to give their view on new designations.	Yes. This improvement was developed over 2018-19, and since 1 May 2019, reports of handling for statutory designation cases have been made available for comment during the normal consultation period, via Historic Environment Scotland's heritage portal.

10	Undertake recommendations from the recent Scheduled Monument Consent User Survey to set out a standard for pre-application.	No. This service improvement was put on hold until we had completed our work on the new Scheduled Monument Consent Policy. This action will be carried over into 2019-20.
11	Undertake audit of first round of Local Outcome Improvement Plans, summarise key findings and report on opportunities for participation.	Yes. This work has been completed, and has informed our emerging approach to engagement with community planning.
12	Scope / implement publication of information requests online, and the potential for publishing certain consultation responses.	In progress. We are currently considering IT options to facilitate this service improvement.
13	Work with SNH to develop policy and practice for landscapes.	In progress. The 2019 Landscape Character Type map and associated Landscape Character Type Descriptions have been introduced. Work on revised guidance on Local Landscape Areas and Landscape Statement is ongoing.
14	Review the statistics we collect on our planning performance with the aim of returning more qualitative data.	Yes. We carried out a review and identified which qualitative data would be most helpful, how this data might best be gathered, and barriers to data gathering in our existing systems and procedures.
15	Carry out a customer satisfaction survey focussed on our regulatory advice.	Yes. Following the end of the 2018-19 reporting period, we carried out an online customer satisfaction survey. See Case Study 10 to find out more.

SERVICE IMPROVEMENTS 2019-20

We have identified 7 key service improvements for the coming year:

1. Analyse the Planning Bill and secondary legislation to identify areas where we can support implementation.
2. Continue to develop our approach to supporting successful place-making through our role in planning, including the Place Principle, Key Agencies Group initiatives on placemaking, and the Place Standard.
3. Deliver the initial priorities of the HEPS legacy programme, including:
 - creation of a policy steering group and preparation and publication of topic specific guidance
 - training for decision-makers to support the introduction of new historic environment policies
 - scope the facilitation of Local Authority training and forums (to replace LAHEF)
4. Work with local authorities to identify more efficient and effective working practice.
5. Continue joint working with Scottish Natural Heritage to develop a common understanding of landscape to ensure that cultural and natural aspects are recognised.
6. Undertake recommendations from the recent Scheduled Monument Consent User Survey to make our processes more accessible:
 - set out a standard for pre-application
 - improve information on unauthorised works
 - develop a more user friendly SMC application form
7. Delivery of 'Past Protectors', a collaborative project which will work with young people to deliver greater awareness and education around heritage crime and how to prevent it.



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