



PLANNING PERFORMANCE FRAMEWORK REPORT 2023-2024



HISTORIC
ENVIRONMENT
SCOTLAND

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EACHDRAIDHEIL
ALBA

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INTRODUCTION

This Report details the planning performance of Historic Environment Scotland (HES) from 1 April 2023 to 31 March 2024. 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. Using this model, the report demonstrates how we have performed against the agreed Performance Markers for 2023-24 and describes our contribution to the planning system under the following themes:

- Placemaking
- Capacity building
- Service
- Service improvements

The report gives both quantitative and qualitative evidence of our performance, and highlights aspects of our work through highlights. Key areas of our work include:

- providing advice within the planning system
- regulating works on scheduled monuments
- supporting the development of national plans, policies, programmes and strategies
- designating new sites and places, and reviewing existing designations
- producing historic environment policy and guidance
- monitoring activities related to our work
- actively engaging with and training stakeholders, owners and communities
- providing advice via Design Review Panels and grant aid applications
- supporting works for the conservation and management of historic assets and places

This reporting year included significant work completing workforce planning in our Planning, Consents and Advice Service and initiating an external review. We are responding to major increases in renewables applications and associated infrastructure and demands on our service have outstripped resources. Our service review will facilitate the move to a sustainable delivery model.

The challenges of increased demand have impacted our response times within our service. Response times are likely to continue to increase in the short term while adjustments to our service are made.

Steven Robb, Deputy Head of Historic Buildings, delivering a talk on the work of Historic Environment Scotland in the Scottish Planning System at [The Engine Shed, Stirling](#).



ABOUT HISTORIC ENVIRONMENT SCOTLAND

We are the lead public body established to investigate, care for, and promote Scotland's Historic Environment.

- We care for more than 300 sites of national importance across the country and are the largest operator of paid visitor attractions in Scotland
- 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 manage change to our most significant heritage assets while providing the protection they need, ensuring this resource is available for generations to come. We do this by giving advice on strategic plans and policies, development proposals affecting the historic environment, administering consents for scheduled monuments, and designating historic assets and places
- We support the conservation and sensitive reuse of Scotland's historic environment by providing advice and expertise and offer a wide range of training and learning opportunities
- We provide millions of pounds each year to local communities to repair and revitalise their historic environment
- In every aspect of our work, we strive to follow our five organisational values – we are collaborative, professional, innovative, open, and respectful

We want the historic environment to make a real difference to people's lives. A difference to our health, to our economy, to our culture, to our environment. We want heritage to involve everyone so that we all benefit. Our Corporate Plan, [Heritage for All](#), sets out our vision and priorities.

Perth Museum opened in 2023 in an imaginatively repurposed listed building. Perth City Hall had been disused for many years and was threatened with demolition. A £27 million redevelopment has now given this fabulous building a sustainable future and we are pleased to have supported the project.



WHAT WE DO IN THE PLANNING SYSTEM

The Heritage Directorate leads our work in the planning system, coordinating a wide range of relevant skills, knowledge and expertise from across HES. This Report focuses on the work of our Planning, Consents and Advice Service, Designations Service, Policy Service and Heritage Information and Business Service. Our aim is to promote consideration of the historic environment at all stages of the planning process.

Our Designations Service compiles 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 Planning, Consents and Advice Service (PCAS) provides advice on the potential impacts of development on these nationally important heritage assets, often linked to our statutory functions relating to planning and consenting processes. This includes listed building consent and conservation area consent, and our role as regulator for scheduled monument consent. We are a consultation body for developments requiring an Environmental Impact Assessment. PCAS also leads on strategic planning matters and supports the development and implementation of heritage management policy and guidance and provides advice on the development of planning policy and strategies. The team also engages with strategic stakeholders and communities on the management of the historic environment. This includes supporting regional and local development plan preparation and acting as a Consultation Authority for Strategic Environmental Assessment. We inform

and enable good decision-making, so that the historic environment of Scotland is valued and protected.

Our World Heritage and Heritage Policy team provides leadership and advice for and about World Heritage Sites and World Heritage processes in Scotland. It coordinates the delivery of individual Management Plans for some of Scotland's World Heritage Sites and liaises with and supports coordinators at other World Heritage Sites. The team also develops and consults on policy for the Heritage Directorate and leads on the development of guidance to support the Historic Environment Policy for Scotland. The team also provides external training and conducts community engagement.

Our Heritage Information and Business Service co-ordinates our planning and consenting processes, liaising with applicants and decision-making bodies to ensure we are consistent and timely. They also create and manage data, photographs, drawings, and maps and make a range of information available to the public through our online resources.

Our Heritage Research Service may undertake building recording where listed buildings or unlisted buildings in conservation areas are proposed for demolition. They also offer emergency building recording support to local authorities in situations where it may not be possible to use planning conditions to obtain this information, or where significant buildings have been affected by fire or collapse.

Further information on all these services can be found in [Our Regulatory Framework](#).

OUR PEOPLE

Our four teams include specialists with knowledge of architecture, conservation, archaeology, planning, policy, environmental assessment, and data. 96 members of staff within these teams provide or contribute to a range of planning-related services.

OUR DECISION-MAKING

Decision-making processes are standardised across our teams. They are underpinned by a set of sign-off and quality control procedures. Our schedule of governance for [decision-making for designations and casework](#) is published on our website and there is more information in [Our Regulatory Framework](#).

Table 1: Our People

SERVICE NAME	JOB ROLE	NUMBER OF STAFF
PLANNING, CONSENTS AND ADVICE SERVICE	Head of Service	1
	Deputy Head of Service	7
	Senior Officer	32
	Officer	8
	Field Officer	6
	Casework Support Officer	2
	SERVICE TOTAL	56
DESIGNATIONS SERVICE	Head of Service	1
	Deputy Head of Service	3
	Senior Officer	7
	Officer	8
	Service Support Manager	1
	Service Support Officer	3
	Service Support Assistant	1
	Service Total	24
HERITAGE INFORMATION AND BUSINESS SERVICE	Head of Service	1
	Business Manager	1
	Casework Technician	4
	Business Support Assistant	5
	Service Total	11
WORLD HERITAGE AND HERITAGE POLICY	Head of Service	1
	Deputy Head of Service	1
	Senior Officer	2
	Officer	1
	Service Total	5
COMBINED STAFF TOTAL		96

PERFORMANCE MARKERS

PLACEMAKING

Strategic Planning

By participating in national and strategic plan-making we work with other stakeholders to achieve positive outcomes. Through these conversations, we help protect and conserve the historic environment for the enjoyment, enrichment, and benefit of everyone.

We provide advice and information to support the development and delivery of a broad range of national plans, policies, and strategies. We have, for example, continued to advocate for recognition of our historic environment and the important role played by farmers, crofters and other land managers in caring for historic assets and places across Scotland in the emerging new Agriculture (Scotland) Bill. We emphasised that the historic environment provides significant carbon sinks, and biodiversity refuges, as well as defining local identities and providing resources for sustainable tourism. Financial and other support to farmers, crofters & land managers for managing this resource helps to strengthen and diversify rural economies.

We have also continued to highlight how the historic environment can support and enable our transition to Net Zero by providing advice on the Energy Strategy and Just Transition Plans, Local Heat and Energy Efficiency Strategies and a range of climate action plans across Scotland. We also provided advice on the implementation of the Burial and Cremation (Scotland) Act 2016 through new regulations on burial ground management and the role this plays in the sustainable management of important parts of our cultural heritage.

[Planning reform](#)

In the reporting year we continued to work on the Implementation Programme for the Planning (Scotland) Act 2019 offering advice and evidence to Scottish Government and others as reforms to the planning system, through Scotland's Fourth National Planning Framework (NPF4), are introduced. We also contributed to planning system reform and associated legislation through our involvement in the Key Agencies Group.

[Influencing national plans and policies: summary of national plans, policies and strategies where we provided advice this year](#)

During the past year we continued to provide advice on draft proposals for changes to Permitted Development Rights (PDR). The third and final phase of the [review of PDR](#) focussed on the deployment of domestic and non-domestic renewables equipment, such as solar panels, wind turbines and heat pumps. The review also looked at the alteration/replacement of windows to improve energy efficiency and the roll-out of electricity network infrastructure. This included changes to the requirements for replacement windows in Conservation Areas. We worked with Scottish Government and other stakeholders throughout this phase and gave advice on the opportunities to remove certain applications from the planning process and how to mitigate impacts on the historic environment.

We provided information and advice to support the preparation of the Onshore Wind Sector Deal (OWSD) in the past year. We are also supporting its implementation as an ongoing member of a task and finish group which has been set up to look at how the scope and format of Environmental Impact Assessment Reports can be designed to reduce the burden on consultees. The implementation of the OWSD and its stated aim of halving consenting timescales will have a significant impact on the Planning, Consents and Advice Service going forward. This is discussed further below.

Our advice on national level plans, policies and strategies included giving advice on:

- the Heat Networks Delivery Plan and associated local level strategies
- Burial and Cremation Regulations
- Energy Strategy and Just Transition delivery plans
- Public Health place and wellbeing outcome indicators
- the emerging Agriculture Bill for Scotland
- the designation and management of national parks in Scotland
- changes to building regulations for heating standards
- and delivering Scotland's Circular Economy: A Routemap beyond 2025

Our responses to some of these national consultations are on our website.



HES staff visiting the site of a proposed windfarm in the Scottish Borders. The Onshore Wind Sector Deal (OWSD) aims to half current consenting times for large scale wind developments.

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 placemaking. 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 almost 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 these plans for growth and regeneration. This helps ensure that development is planned in a sustainable way and that potential effects on the historic environment are fully considered in the plan-making process.

We have continued to support development plan preparation, and have worked closely with our partners in Local Government, particularly the [Heads of Planning Scotland](#) Development Plan sub- committee, on how we can support evidence gathering for new plans. This included working in collaboration with fellow key agencies to collate environmental and other planning information that can support good planning decisions and outcomes. In collaboration with other Key Agencies we piloted a new approach to our engagement. This has involved [partnering with 6 Local Authorities](#) and working together with an emphasis on place and in line with our commitment to the Place Principle. This has also led to the production of

a [resource package on place skills for plan making](#) and the sharing of lessons learned.

We have also taken a proactive approach to evidence gathering and shared information and our views on this important stage of plan making with local authorities that are beginning work on their new development plan. We expect activity on Evidence Reports to continue during 2024-25 as well as work around the identification of land for development to begin as some authorities move into the next phase of plan preparation.

DEVELOPMENT MANAGEMENT

Our role in relation to development management is mainly advisory. We are a statutory consultee for planning applications affecting historic environment assets designated as being of national importance, applications for listed building consent and applications for conservation area consent. We are a named consultation body for applications requiring Environmental Impact Assessment (EIA). We are the regulator (decision-maker) for consent for works on scheduled monuments.

A wide range of actions and interventions are required to achieve overall Net Zero by 2045 and the increase in consultations from infrastructure related to this target has put significant pressures on our resources. Our detailed workforce plan formed an evidence base for an external review of our service which began in February 2024 and will report next year.

CAPACITY BUILDING

SHARING GOOD PRACTICE, SKILLS AND KNOWLEDGE

We work across the planning and development sector to promote the historic environment and share skills, knowledge, and good practice. We engage with several national groups including the Heads of Planning Group, the Royal Town Planning Institute, the Key Agencies Group, and the Built Environment Forum for Scotland (BEFS) historic environment working group. We engage with higher education institutions by providing talks and tours to student groups.

Training and outreach

In our commitment to sharing good practice across the sector, we regularly engage in training and outreach, and examples are:

- In March 2024, we delivered a lecture to 150 final year students at the University of Strathclyde. Topics covered included an overview of the historic environment, legal frameworks, roles and responsibilities including in EIA. The students were from backgrounds including civil and environmental engineering.
- In November 2023 we delivered a 2-day training course on EIA to representatives from both HES and NatureScot. This covered the whole EIA process, from pre-application stage to decision-making.
- In June 2023, we delivered four talks to the Institute of Historic Building Conservation as part of their Annual School marketplace. They covered HES policy and procedure.
- In June 2023 we were on the judging panel of Aberdeenshire Council Design Awards. We also participated in site visits as part of this work.
- In April 2023, we presented a paper about modern heritage to the annual RTPI Young Planners' conference in Stirling.

Policy and Guidance

In October 2023 we published updated Managing Change guidance on [Fire and Historic Buildings](#). The updated guidance reflects consultation feedback on the role of historic buildings as part of our circular economy and existing infrastructure. Between January and March 2024 we consulted on draft [Managing Change guidance on Underwater Heritage](#). We expect to publish finalised guidance in 2024-25.

Both of these guidance notes reflect the priorities set out in [Pointing the Way to the Future](#) – our statement on the climate and nature crises, published in July 2023. This was promoted throughout Autumn 2023, including a [blog post](#) and a letter from our Chief Executive to the Key Agencies Group. In the coming financial year we also expect to start work on a similar statement on cultural significance, increasing transparency in how we consider this concept when we apply national policy as set out in the Historic Environment Policy for Scotland.

We published guidance on [Working on or near scheduled monuments](#), providing information on practical precautionary steps to take when working near to scheduled monument, and the scheduled monument consent process. Guidance on [reporting and archiving requirements for archaeological excavation on scheduled monuments](#) and [applying for metal and mineral detecting consent](#) was also updated.

Key Agencies Group

As one of the public bodies in the [Key Agencies Group \(KAG\)](#) we work to share information and support decision-making in the planning system.

Other key initiatives by KAG to support the culture change and improved joint-working required as part of the reforms included collaborative approaches to placemaking, the use of environmental evidence in development planning, and promoting skills development across the sector. We provided feedback via the [High-Level Group on Planning Performance](#) and shared our experience of working with new policies within NPF4.

We have worked closely with fellow key agencies and other statutory consultees on resourcing the planning system and [participated in discussions](#) in support of forthcoming changes to fees and other reforms that seek to build capacity.

We have also continued to regularly liaise with other key agencies and Scottish Government on the delivery of NPF4, sharing our experience of the new planning policy framework and its implementation. In addition to our quarterly Key Agency Group meetings, we now hold quarterly meetings with Scottish Government and with the minister responsible for planning. These provide an excellent opportunity to identify opportunities for collaboration, monitoring of policy delivery and the identification of areas for prioritisation. This has helped to shape and drive our engagement in key areas including the emerging Green Freeports and a range of national developments.

Scottish Heritage Crime Group

The Scottish Heritage Crime Group is a multi-agency group that tackles heritage crime across Scotland. The group meets four times a year and comprises members from Police Scotland, HES, Scottish Government, National Trust for Scotland, Association of Local Government Archaeological Officers, National Museums Scotland, Treasure Trove Unit, and Scottish Canals. In the past year the group's focus has been reducing illegal metal detecting. The group are currently drafting national guidance on metal detecting in Scotland and continues to focus on delivering heritage crime actions identified in the [Rural Crime Strategy 2022-25](#).

In support of continuous improvement of our scheduled monument enforcement work, in March 2024 all relevant HES staff attended a one week training session on evidential standards, delivered by Police Scotland.

HES staff working to remove graffiti from Linlithgow Palace in April 2023.



EVIDENCE AND DATA SHARING

We continue to add information about the historic environment to our websites both from external contributors, and through our own survey programmes and desk-based assessment. This information supports heritage management, planning and research, and promotes the resilience of the historic environment through knowledge. We have progressed plans to improve access to our datasets and we hope this will provide a range of enhancements to our current planning services.

We share data with local authority Historic Environment Records (HER). We make our information freely available online through PastMap, which includes links to the data of participating HERs. Our data is available to download from our decisions portal and through a range of websites, with over three million user visits this year.

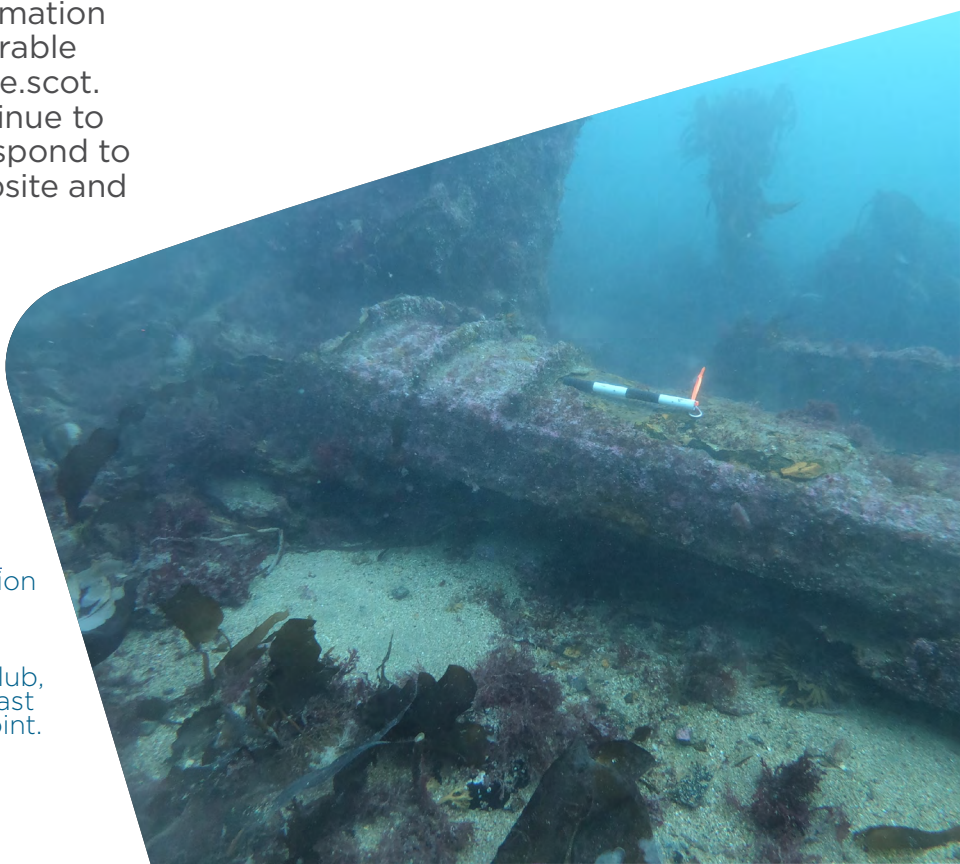
Over 2022-24, we have been working on a project to bring together a wealth of information, images, and data that is currently spread across many of our websites. Following the public launch in late 2024, our heritage information will be searchable and discoverable through a single website - trove.scot. The existing websites will continue to operate in parallel while we respond to user feedback on the new website and monitor adoption rates.

We publish an online quarterly heritage newsletter called [Lintel](#). It showcases what we're doing in our Directorate and highlights a range of stories, as well as events, surveys and consultations. You can sign up to [Lintel](#) here.

[Buildings at risk register](#)

A review of our [Buildings at Risk Register](#) has been completed. The purpose of the review was to report on the impact of the buildings at risk register in bringing buildings back into use and to make evidence-based recommendations that will inform our long term decisions about the resource. The review made recommendations which will be considered in 2024-25.

Our [August 2023 edition of Lintel](#) featured our designation of the wreck of the [Comet](#) - Europe's first commercial steamship. Discovered by members of Dalriada Dive club, the wreck is located in the fast tidal waters off Craignish Point.



SERVICE

DECISION-MAKING TIMESCALES

Our Headline Indicators for 2023-24 are consistent with previous years, showing a high level of service across all our planning roles. These cover our timescales for decision-making and consultation responses across the following areas:

- Development planning
- Strategic environmental assessment
- Environmental impact assessment
- Development management
- Listed building and conservation area consents
- Scheduled monument consent

In this section we report on our main activities associated with the planning process and include:

- Scheduled monument enforcement
- Scheduled monument condition monitoring
- Designations
- Complaints handling

Development Planning

During 2023-24 we were consulted on 54 development plan related cases, responding to 100% within required timescales. This increased number of cases was expected, because of the implementation of a new [development planning](#) process that is now coming into effect, with almost all local authorities taking forward work on a new development plan for their areas.

The majority of the Evidence Report activity this year related to proactive work we have done to send evidence to Local Authorities in advance of any formal requests issued to key agencies. We anticipate that development planning activity will continue to increase in 2024-25 as more Local Authorities produce Evidence Reports and other begin identifying land for development and preparing their Proposed Plans.

Table 2: Development plan consultations

Consultation Type	2023-24	2022-23	2021-22	2020-21	2019-20
Pre-Main Issues Report	1	0	1	1	9
Main Issues Reports	0	0	1	4	4
Evidence Request/Report	29	-	-	-	-
Draft Proposed Plans	16	2	6	5	2
Proposed Plans	2	1	3	5	5
Modified Plans	0	0	0	0	1
Delivery Programmes	2	2	1	2	4
Examination / Further Information Request	0	0	0	0	4
Supplementary Guidance	4	11	8	13	22
Total	54	16	20	30	51
% statutory development plan consultation responses within required timescale	100%	93.75%	100%	100%	100%

Note: In 2024 the process for preparing Local Development Plans was amended by the Planning (Scotland) Act 2019. This led to the replacement of the Main Issues Report with an Evidence Report and made some other procedural changes, such as the introduction of a new Gatecheck procedure.

Strategic Environmental Assessment

During 2023-24 we received 122 Strategic Environmental Assessment (SEA) consultations, a similar level (119) to 2022-23. We responded to 100% of these consultations within the required timescales. We have continued to see an increase in climate change related plans, including initial work on Local

Heat and Energy Efficiency Strategies and increased activity around woodland creation by many local authorities. We have also begun seeing increased SEA activity associated with Local Development Plans and expect this to grow significantly during 2024-25.

Table 3: Strategic Environmental Assessment consultations

Consultation Type	Target (days)	2023-24	2022-23	2021-22	2020-21	2019-20
Screening Report	28	64 (100%)	58 (100%)	68 (100%)	55 (100%)	102 (99%)
Scoping Report	35	31 (100%)	34 (100%)	24 (100%)	17 (100%)	22 (100%)
Environmental Report	As agreed	27 (100%)	27 (100%)	22 (100%)	20 (100%)	32 (100%)
Total		122 (100%)	119 (100%)	114 (100%)	92 (100%)	163 (100%)

Environmental Impact Assessment

During 2023-24 we received 305 Environmental Impact Assessment (EIA) consultations and responded to 98% within agreed timescales. There was a small decrease in the number of EIA consultations we received compared to 2022-23, but the size and complexity of proposals has increased. We are a consultee for all EIA regimes in Scotland and have seen consultations under a number of these including for agriculture, flood alleviation, trunk roads and planning. However, the majority of the consultations we received were proposals for renewable energy developments to support Scottish Ministers' net zero ambitions including on and offshore wind and solar. We were also consulted on other types of projects which support the growth in renewable energy developments such as battery energy storage systems and transmission infrastructure. We expect there to be an increase in the number of these types of projects over the next year.

We've been working closely with Scottish and Southern Electricity Networks to provide expert advice to a project replacing the overhead power line connecting Skye and the Western Isles with the mainland. One of the proposed routes ran directly through the [Battlefield of Glen Shiel](#).

In our advice we emphasised that historic battlefields hold an important place in our national heritage. You can read more about our role in the development of new infrastructure in our [September 2023 blog](#).



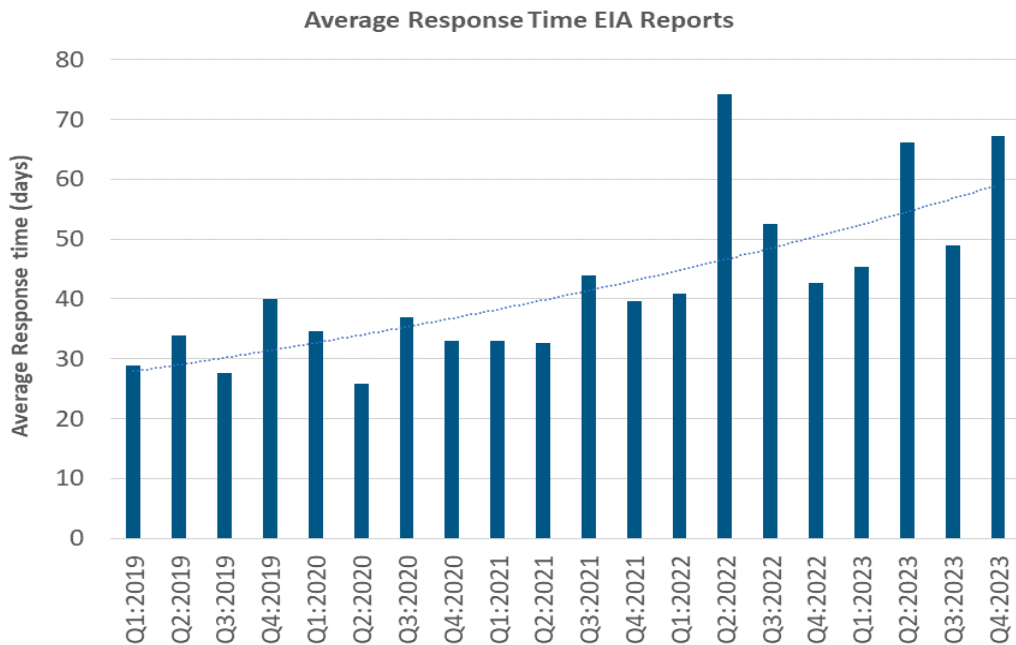
Table 4: Environmental Impact Assessment consultations

Consultation Type	Target (days)	2023-24	2022-23	2021-22	2020-21	2019-20
Screening Report	35	27 (97%)	29 (100%)	34 (100%)	34 (97%)	36 (99%)
Scoping Report	35	136 (98%)	161 (100%)	137 (100%)	105 (99%)	120 (99%)
Environmental Report	As agreed	104 (98%)	91 (100%)	105 (99%)	101 (100%)	104 (100%)
EIA Addendum	As agreed	38 (100%)	43 (100%)	48 (100%)	49 (100%)	50 (96%)
Total		305 (98%)	324 (98%)	324 (99%)	289 (99%)	310 (99%)

We are being consulted on development proposals on increasingly complex sites, increasingly with one or more nationally important assets within the site boundary. Despite there being a slight drop in the overall number of EIA consultations we received in 2023/24, it is taking us more time to respond. This is partly due to the complexity of development sites being brought forward and increases in non-EIA consultations elsewhere within the Planning, Consents and Advice Service. Many of the EIA Regulations in force

in Scotland enable us to negotiate lengthy extensions to the 30-day consultation timescales.

Between 2019 and 2023 our average response time to EIA Reports has risen from 28 days to around 60. However, the Onshore Wind Sector Deal (OWSD) aims to half current consenting times. On the full implementation of the OWSD, our ability to manage in this way will be severely curtailed for large wind farm developments.



Development Management Consultations

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

- Planning applications
- Listed building consent
- Conservation area consent

Planning authorities normally allow us 21 days to respond to these consultations, but we have previously agreed a target of responding within 14 days as part of our commitment to providing a high standard and responsive level of service.

Table 6: Development management consultations

Consultation Type	Target (days)	Target (%)	2023-24	2022-23	2021-22	2020-21	2019-20
Planning Consent	14	90%	921 (88%)	995 (93%)	1016 (93%)	890 (96%)	880 (93%)
Listed Building Consent	14	90%	2657 (97%)	2684 (97%)	2752 (98%)	2254 (97%)	2759 (97%)
Conservation Area Consent	14	90%	113 (81%)	85 (89%)	91 (86%)	89 (92%)	126 (83%)
Total			3691 (94%)	3764 (96%)	3859 (97%)	3233 (96%)	3765 (96%)

Planning Applications

In 2023-24 we were consulted on 921 planning applications, 74 less than last year. We objected to 57 applications (6%) and provided comments on a further 271 (29%). 590 consultations were returned with no comment (65%). Of the applications we commented on or objected to, we failed to meet our 14 day target on 113 consultations (34%), representing 12% of our overall responses.

We also provided pre-application advice on 161 planning applications, similar to the last reporting period (153).

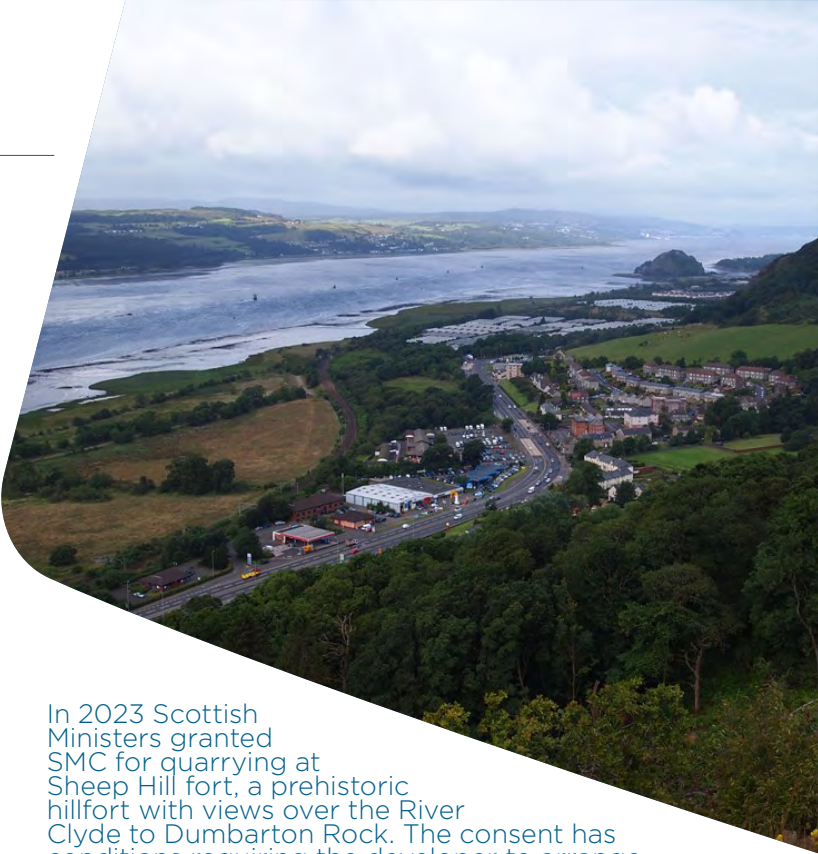
Listed Building Consent

In 2023-24 we were consulted on 2657 listed building consent applications, a similar number to the previous year. We responded to 97% within the required timescale, exceeding our 90% target. 10 (0.3%) were objections, a slight reduction to last year. Our advice helps to make sure changes to our listed

buildings are appropriate and sensitive. In addition to our statutory advice, we provided formal pre-application advice on 152 listed building consent applications, a similar number to last year. There was a further significant rise in general correspondence related to listed building consent.

Conservation Area Consent

We were consulted on 113 conservation area consent applications, a 33% rise on last year (85). We responded to 81% of these consultations within the required timescale, falling short of our target of 90%. This reflects that these applications are only for demolition, so tend to be complex. 6 of our responses were objections, representing 5% of our overall responses, a smaller proportion to previous years. In addition to our statutory advice, we provided pre-application advice on some conservation area consent applications.



Scheduled Monument Consents

Scheduled monument consent is used to ensure that any changes to monuments of national importance are appropriate and sympathetic to their character. Works on scheduled monuments, including repairs, require consent. Crown bodies (government departments or executive agencies) are not required to apply for scheduled monument consent. Instead, these bodies apply to us for scheduled monument clearance. Metal and mineral detecting consent is required for 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 2023 Scottish Ministers granted SMC for quarrying at Sheep Hill fort, a prehistoric hillfort with views over the River Clyde to Dumbarton Rock. The consent has conditions requiring the developer to arrange full archaeological excavation before the site is lost. The site has an unusual and complex planning history – you can read more about our role here: [Sheep Hill Fort](#)

We processed 227 applications for scheduled monument consent, scheduled monument clearance and metal and mineral detection consent, a slight decrease on the previous year. We processed 216 of these (95%) within 8 weeks, exceeding our target of 90%. No applications were refused. 138 (61%) were granted without conditions.

2023-24, we notified 7 applications (3%). One application was called in by Scottish Ministers for their own determination and subsequently approved.

HES has a duty to notify Scottish Ministers where we are minded to grant scheduled monument consent for works which would allow a greater level of intervention than the minimum level that is consistent with conserving what is culturally significant in a monument. There is no requirement to notify clearance or metal and mineral detecting consent applications. In

100% of scheduled monument clearance and metal and mineral detecting consent applications were determined within eight weeks.

All our scheduled monument consent decisions are published through our decisions portal. The Historic Environment Scotland Act 2014 introduced a right of appeal against scheduled monument consent decisions. No decisions were appealed this year.

Table 7: Scheduled Monument Consents

Consent Type	Target (days)	Target (%)	2023-24	2022-23	2021-22	2020-21	2019-20
SM Consent	56	90%	189 (94%)	212 (94%)	197 (85%)	230 (86%)	317 (94%)
SM Clearance	56	90%	16 (100%)	6 (100%)	9 (100%)	13 (92%)	9 (100%)
Metal and Mineral Detecting	56	90%	22 (100%)	23 (74%)	24 (100%)	17 (100%)	22 (100%)
Total			227 (95%)	241 (92%)	230 (87%)	260 (87%)	348 (95%)

Scheduled Monument Enforcement

Reports of unauthorised works on scheduled monuments remained at a similar level to the past two years. Cases of illegal metal detecting and vandalism remain at higher than usual levels. A number of reports were also received relating to unauthorised installation of utilities infrastructure. We continue to distribute free signage to landowners to help raise awareness of heritage crime and reduce incidents. New sector wide metal detecting guidance is in preparation with

partners to ensure clear and consistent messaging on metal detecting.

We have continued to work with owners and others to secure informal resolution for unauthorised works that could be undone or repaired and have sustained the higher level of resolutions seen last year. No enforcement or stop notices were issued within the reporting period. One report of graffiti and vandalism on a scheduled monument was reported to the procurator fiscal by Police Scotland.

Table 8: Scheduled Monument Enforcement Measures

Consent Type	2023-24	2022-23	2021-22	2020-21	2019-20
Reports of Unauthorised Works	200	207	203	166	160
Advisory Letters	23	18	19	18	24
Informal Resolutions	32	33	16	12	21
Warnings	3	1	0	3	4
Enforcement Notices	0	0	0	2	0
Referral to Procurator Fiscal	1	2	0	2	2

Port-na-Caranean settlement on Rum was one of 250 scheduled monuments assessed from the air last year. These new images helped us to assess the condition of the monument, looking for changes in vegetation cover and structural decay.



Scheduled Monument Condition Monitoring

We monitor the condition of scheduled monuments and meet owners and land managers as a key part of our duty to care for the historic environment.

During visits we record the condition of monuments. This information forms part of Scotland's Historic Environment Audit and allows us to understand and respond to nationwide change. Most years we visit 500-700 scheduled monuments and assess aerial photographs of a further 250.

In 2023-24 we monitored the condition of 851 scheduled monuments. 646 were assessed by field visits and 205 assessed from aerial photographs. 770 monuments (90%) were in a satisfactory condition.

Designations

Providing the right designations in the right place is central to the protection of the historic environment in the planning process.

There are currently over 55,000 national designations which include scheduled monuments, listed buildings, gardens and designed landscapes, battlefields, and historic marine protected areas. We designate new sites and places every year. We also remove designations where sites and places no longer meet the relevant criteria and update and amend existing designations.

This year, we made 553 designation decisions, an increase on last year but still a reduction on the average of previous years. This number includes decisions to designate new sites and places, and decisions to amend or remove existing designations. It also includes minor record changes.

The largest reduction in cases is in minor record changes. This is due to a reduction in project work, to allow us to focus on progressing cases that have been in the system for a long time due to (among other factors) the difficulty in progressing cases during the pandemic and a resulting backlog.

Two listing appeals were submitted this year. One was dismissed by the Reporter and the other was disallowed.

For the purposes of the figures below, amendments are material changes to designations. These alter what is designated. For scheduled monuments, Inventory gardens and designed landscapes, and Inventory battlefields, this is a change to the description or the boundary map of the designated area. For listed buildings, this is a change to the address in the listing.

Minor record changes are updates to the supplementary information which describe the site or place, identify its location or provide additional references or data. These cases reflect ongoing maintenance of our designation records. The following table sets out the changes made to scheduled monuments, listed buildings, gardens and designed landscapes, and battlefields designations. There have been no changes to historic marine protected areas this year.

In September 2023 we added two designations in Aberdeen commemorating the Piper Alpha Disaster. Sue Jane Taylor's bronze and granite memorial was listed at Category B while we added the memorial rose garden to our Inventory of Gardens and Designed Landscapes.



DEDICATED TO
THE MEMORY OF THE
ONE HUNDRED AND SIXTY SEVEN MEN
WHO LOST THEIR LIVES
IN THE
PIPER ALPHA OIL PLATFORM DISASTER
6TH JULY 1988

Table 9: Designation Maintenance

Designation	Maintenance Type	2023-24	2022-23	2021-22	2020-21	2019-20
Scheduled Monuments	Designation (additions to the Schedule)	13	18	6	16	7
	Amendments	42	22	56	21	34
	Minor record changes	187	117	394	132	335
	Removal from the schedule	3	2	24	21	55
	Appeals	0	0	0	0	0
Listed Buildings	Designations (additions to the List)	13	15	12	32	42
	Amendments	30	25	54	59	88
	Minor record changes	149	109	212	209	451
	Removal from List	36	20	28	51	112
	Appeals	2	4	6	2	3
	Certificates of Intention Not To List (COINTL)	1	4	1	2	2
Gardens and Designed Landscapes	Designations (additions to the Inventory)	2	0	1	1	1
	Amendments	1	0	1	1	1
	Minor record changes	5	1	3	13	4
	Removal from Inventory	0	0	0	0	0
Battlefields	Designations (additions to the Inventory)	0	0	0	0	0
	Amendments	0	0	0	0	1
	Minor record changes	1	2	3	1	0
	Removal from Inventory	0	0	0	0	1
Total number of designation decisions (including all designations and other work not mentioned above)		553	396	801	769	1434



This year we designated Tollcross Fire Station as a listed building at Category B. The building is a major example of postmodern architecture in Scotland and was unique amongst contemporary late 20th century stations. You can read more about it in our [January 2024 edition of Lintel](#).

Complaints Handling and Information Requests

Complaints

Our [complaints handling procedure](#) is on our website. The guidance is in line with the handling procedure provided by the Scottish Public Services Ombudsman.

This year we received six formal complaints. Five were handled under stage one (frontline resolution). One of these complaints was withdrawn.

Two of the complaints related to difficulties contacting our designations team and the time taken to process requests. Both of these complaints were partially upheld. The processing of the requests was in line with our procedures, but we acknowledged the difficulties contacting the team in these two instances. We have now reviewed our call handling procedures, introduced improvements and clarified our response times.

One of the stage 1 complaints related to the time taken to respond to a consents-related enquiry and the nature of the advice we provided. This complaint was not upheld as our officer responded very quickly (within 3 hours) and provided the correct advice. The final complaint related to a letter we had issued about potential unauthorised works to a scheduled monument. We had issued the incorrect letter, we apologised for this error and asked officers to take extra care in this area going forwards.

One of our formal complaints was handled under stage two (investigation) of our complaints handling procedure. The complaint related to the processing of personal data, the tone and the nature of our advice. This complaint was complex

and required an extension of the handling time period. We did not uphold the complaint. We found that proper procedures had been followed throughout.

Information Requests

We received 30 information requests; all were handled under the Environmental Information (Scotland) Regulations 2004. We also contributed to a further four requests which were handled by colleagues in a different part of Historic Environment Scotland. For the requests we led on, the information was released for eight, partially released for 19 and not held for two. One request was withdrawn before we responded. No reviews of our decisions were requested. These requests related to information about heritage assets, their history, designation or advice/decisions we, or our predecessor organisation Historic Scotland, gave as part of a change management process.

SERVICE STATEMENTS AND JOINT WORKING AGREEMENTS

Planning Service Standard

We have begun a review of our [Planning Service Standard](#) to ensure the information presented in it is up to date and reflects changes to the planning system and our delivery timescales. This will be finalised after our service review is complete and published next year.

Section 17 Management Agreements

Section 17 of the Ancient Monuments and Archaeological Areas Act 1979 allows for pre-agreed types of works to be carried out without separate applications for scheduled monument consent.

Since 2016 the HES Heritage Directorate has had a Section 17 agreement for minor maintenance works on scheduled monuments across the HES Estate. A review of the content of this agreement has been undertaken, with a new agreement drafted to reflect the wider range of maintenance works required across the HES Estate. The new agreement will be finalised next year.

We entered into a [Section 17 Agreement with Scottish Canals](#) in 2021. An audit process was built into the agreement and in 2023 we conducted site visits to four canals to review a variety of works that had been carried out under the agreement. This found that works had been carried out appropriately and demonstrated that the agreement is working well, saving both public bodies time and resources that would have otherwise been required to prepare and process separate SMC applications. The audit also highlighted challenges with applying the agreement to more complex projects and this will inform a future review.

ENGAGEMENT WITH SERVICE USERS

Service Review

We have engaged with a wide range of service users and stakeholders through our external reviews of our Buildings and Risk Register and Planning, Consents and Advice Service. We have sought feedback on the level of service we offer and the effectiveness of our advice. The information gathered will inform decision-making on the shape of our service moving forward.

Policy and Guidance Development

We have continued to work with a range of partners on the monitoring of existing policy and guidance. This has included working with many planning authorities as they begin work on their Local Development Plan Evidence Reports and assisting with the identification and interpretation of key policies and supporting data.

We have revised our designation selection guidance in relation to historic battlefields. This is the first of a series of actions the organisation will deliver in response to a 2022 report on how historic battlefields are managed within the Scottish planning system).

We have also commissioned and contributed to studies by Harlow Consulting on the impact of VAT on listed buildings and on their recent review of the Buildings at Risk Register.

Design Review Panels

We regularly participate on panels to review and offer advice on design options. This includes contributing to Architecture and Design Scotland's review panels and workshops and participating Local Authority Urban Design Forums, including Glasgow and Edinburgh.

SERVICE IMPROVEMENTS

CHANGES TO MEET IMPROVEMENTS FROM 2023-24

Table 10: Service improvements from 2023-24

Service improvement actions for 2023-24	Planned outputs	Was the service improvement achieved?
Review of Planning Consents and Advice Service by external consultants	Report produced	Partially achieved. We completed an internal workforce plan which formed the evidence base for a review of our service. External consultants were appointed in January 2024 and are due to report in June 2024
Plan stakeholder and public surveys to give us long term baseline information about our services and how we can improve them	Plan for implementation	Not achieved. The surveys will take place in summer 2024 and annually thereafter.
External review of Buildings at Risk Register	Report produced	Achieved. Final report received in February 2024. Now considering the recommendations.
Publish updated guidance Working on or near Scheduled Monuments	Guidance published	Achieved. Guidance published in January 2024.
Review approach to offering advice on Local Development Plans focussing on Evidence Reports and early engagement	Participation in Evidence Report pilots and creation of outputs/toolkits	Achieved. We participated in all pilots and the first phase of these toolkits are now published. We have also worked with key agencies to identify key evidence, produced a new site assessment checklist for SEA and developed our own template reports containing information held by HES that can support development plan preparation.
Engaged with the review of EIA scoping for onshore renewables as described in the onshore wind sector deal	Engagement Evidence	Achieved. We are part of a task and finish group which has been set up to look at how scoping, in the first instance, can be more effective so that EIA Reports are more streamlined. The work of the group is ongoing at the time of writing and is due to conclude in summer 2024.
Managing Change programme established	MCHE forward programme approved	Partially achieved. We have internal approval on our Managing Change programme priorities and will engage on these externally in 2024-25 before we finalise our forward plan
External review of our approach to world heritage	Review produced	Partially achieved – consultants appointed and report due in 2024-25

SERVICE IMPROVEMENTS FOR 2024-25

Looking forward to 2024-25 our main focus will be on implementing service changes following a review of our service by external consultants. This will include our Planning, Consents and Advice service and Buildings at Risk Register. Further service reviews of Designations and World Heritage will also be completed.

We also have some service improvements from the past year that we have partially achieved, which we plan to progress during 2024-25. We will make progress in the following eight key areas.

Table 11: Service improvements for 2024-25

Service improvement actions for 2024-25	Planned outputs
Planning Consents and Advice Service Review	Review produced and plan for implementation of a sustainable delivery model for our service
Plan stakeholder and public surveys to give us long term baseline information about our services and how we can improve them	Surveys completed in summer 2024, and analysed and published in 2024-25 and carried out annually thereafter
Implement new processes for scoping of large-scale onshore wind developments as a result of the Onshore Wind Sector Deal. Includes addressing our processing timescales.	Our scoping advice reviewed and aligned with the requirements of the Onshore Wind Sector Deal. Our processing timescales reviewed
Review of Planning Service Statement	Amended statement published
Implementation of findings of external review of Buildings at Risk Register	Changes implemented
Publish updated guidance on Metal Detecting in Scotland (multi-agency publication), and application guidance for Metal and Mineral Detecting Consent	Guidance published
Publish Managing Change Underwater Heritage guidance	Guidance published
Review the Designations functions provided by HES, including the state of existing designations and develop a sustainable long-term strategy for delivery	Revised Designations strategy
Finalise Managing Change programme	Forward programme finalised
External review of our approach to world heritage	Review produced



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