

The Scottish Government,  
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Edinburgh,  
EH6 6QQ

[deliveryadvice@gov.scot](mailto:deliveryadvice@gov.scot)

24 March 2016

Dear Sir / Madam,

**Draft Planning Delivery Advice on Housing and Infrastructure<sup>1</sup>**

Thank you for the opportunity to comment on this draft advice.

**The Chartered Institute for Archaeologists**

The Chartered Institute for Archaeologists (CIfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,200 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

This response was drafted with the aid of CIfA's Scottish Group which has over 250 members practising in the public, private and voluntary sector in Scotland. Furthermore, CIfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

**Draft Planning Delivery Advice on Housing and Infrastructure**

**General**

CIfA welcomes the publication of this draft advice and supports Scottish Government in its aim *'to deliver high quality places for people that meet the needs of communities and support sustainable and inclusive economic growth.'* (paragraph 5 of the consultation document.) However, sustainable development and growth must (amongst other things) address the implications for the historic environment of delivering housing and infrastructure and this the draft advice fails to do.

Early and appropriate consideration of the historic environment in the planning process is an important component in the prompt delivery of sustainable housing and infrastructure and this needs to be recognised in the advice.

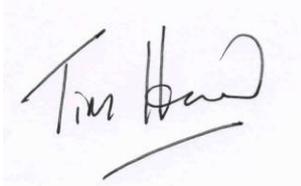
Thus, for instance, the example of collaborative working, the Commonwealth Games Village project, cited in the text box after paragraph 9 of the draft, involved an extensive programme of archaeological evaluation and excavation. (see, for example, <http://www.cfa-archaeology.co.uk/2014/07/the-commonwealth-games-athletes-village-dalmarnock-glasgow/>)

### Specific comments

1. ClfA welcomes Scottish Government's support for a plan-led system which provides an appropriate means to manage and protect the historic environment.
2. The Institute is concerned to see that advice on housing makes clear the need for housing assessments to reflect genuine need and demand – otherwise an over-identification of land can result in pressure to identify more environmentally-sensitive land for development.
3. ClfA endorses the view expressed at the end of paragraph 75 of the consultation draft that the answer to lower than anticipated levels of completions is not always to identify more land for development, but may entail efforts to unlock already identified sites which are not, for whatever reason, coming forward for development.
4. It is of great concern that impact upon the historic environment is not mentioned in the consultation document as a consideration in the identification of sites through the plan process and elsewhere. Even where environmental considerations are included (in the Call for sites template at page 52) this does not include archaeological / historic environment issues.
5. Nor is mention made of historic infrastructure in relation to or alongside references to green infrastructure in Appendix 1 of the draft (paragraphs 29-31 at page 35). Creative and appropriate incorporation of local historic environment features can enhance sense of place and benefit historic environment character and survival. This is affirmed in *Our Place in Time: The Historic Environment Strategy for Scotland* which emphasises that the '*sense of place and strong cultural identity provided by the historic environment plays a crucial part in the sustainability of communities and in promoting a positive image of Scotland across the world.*'
6. This document should include advice on dealing with archaeology / the historic environment in plan preparation in line with Scottish Planning Policy and paragraph 13 of PAN 2/2011 (including the need for archaeological desk-based assessment and field evaluation in appropriate cases) and on the need for early engagement between developers and local authorities when dealing with both housing and infrastructure proposals (in line with paragraphs 15-17 of PAN 2/2011). If such steps are not taken the consequence is often delay and additional expense when issues come to light at more advanced stages in the development process.

If there is anything further that I can do to assist, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch  
Senior Policy Advisor

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<sup>1</sup> <http://www.gov.scot/Topics/Built-Environment/planning/Roles/Scottish-Government/Guidance/Other-Publications/Housing-Infrastructure>