



HISTORIC
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Our case ID: 300024678
SEA Gateway ref: 01355
28 January 2020

Dear Madam / Sir

[Environmental Assessment \(Scotland\) Act 2005](#)
[01355 Environmental Report – The Scottish Government - Programme for Extending Permitted Development Rights in Scotland: A Sustainability Appraisal](#)

Thank you for your consultation which we received on 7 November 2019 about the above Programme for Extending Permitted Development Rights (PDR) in Scotland and its Environmental Report / Sustainability Appraisal. We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the proposed Work Programme for extending PDR with part two focusing upon its environmental assessment.

Part 1: The Proposed Work Programme for Extending Permitted Development Rights in Scotland

We note the proposed Work Programme, including the proposed phasing and groupings. We look forward to early engagement in the detailed work which will be progressed to develop proposals to extend permitted development rights for the 16 development types. We consider that the environmental assessment provides a useful basis on which to further explore the potential effects and mitigation of the many alternatives available.

You note that as the work progresses, extension of PDR for other development types may be considered. We welcome that you have recognised that additional work may be required to consider the likely impact of any proposals that were not considered as part of the current environmental assessment and the subject of this consultation exercise.

Part 2: Environmental Report

We welcome the considerable work that has been invested in understanding the likely environmental effects of the proposed Work Programme at this stage. Use of these findings, with additional assessment where necessary, will be key to an informed, iterative ongoing process as each of the work streams within the proposed Work

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Programme develops, and also as basis on which to understand the cumulative effects of the proposals that emerge from those work streams.

We have considered the environmental assessment, which forms part of the Sustainability Appraisal (SA). Detailed comments on the findings and mitigation measures for each development type are included at Annex A, and more general comments on the assessment are below.

Baseline

We welcome that the baseline summary covers both designated and undesignated historic environment assets. However, some of the data used within the summary is not up to date, and should be reviewed before use in any further assessment. It would have been helpful for the baseline narrative to draw out how the data presented relates to consideration of the effects of the proposed Work Programme on the historic environment.

Environmental Effects

We are broadly content with the findings in relation to the historic environment, subject to our detailed comments provided in Annex A and the points below.

- **Levels of significance**
A recurring issue throughout the assessment is a lack of narrative to explain why effects were found to be minor rather than significant, or vice versa. Given the level of uncertainty frequently identified in the scoring of effects on the historic environment, a clear understanding of the likely level of significance will be key to informing the forthcoming detailed development of proposals and consideration of alternatives.
- **Presentation of findings**
Use of summary narrative is helpful in making the SA more accessible, but consistency between the scoring, scoring justifications, main narrative, key issues boxes and summary sections could be improved. The summary sections are not sufficiently detailed to provide a comprehensive overview of likely effects, and it will be important to ensure that the SA as a whole, including appendices, is used to inform future discussions on the Work Programme, rather than just the summary findings.
- **Assessment of cumulative, secondary and synergistic effects**
Whilst we recognise the challenges in terms of providing a definitive assessment of cumulative effects at this stage, due to the uncertainty over combination of alternatives will be taken forward, we consider that there is considerable scope at this stage of the process to identify likely areas of cumulative, secondary and synergistic effects on the historic environment from alternatives across the development types considered. However, the assessment narrative provided for the historic environment simply summarises the cumulative, secondary and synergistic effects of individual development types, rather than providing an



assessment of potential effects arising from interactions of alternatives across differing development types.

It is important that as the proposed Work Programme progresses, there is a clear understanding of the potential cumulative effects of proposals across the range of development types considered. The Post Adoption Statement should clarify how this assessment work will be integrated into the work-streams of the Work Programme.

- Using the environmental assessment findings
The Post Adoption Statement should set a clear framework for ensuring that the environmental assessment findings inform the next stages of the proposed Work Programme. We welcome that you recognise that further assessment may be required as the work streams progress.

Mitigation and Monitoring

- The effectiveness of the measures proposed to mitigate effects on the historic environment will be dependant on how they are applied in practice, and how much control there is over their implementation. For example, the ability of prior approval processes to mitigate historic environment effects may be affected by differing local authority processes. The effectiveness of design guidance to mitigate effects will be influenced both by the content of the guidance, and the extent to which it is adhered to. Consideration of the practical application of mitigation measures and their ability to mitigate effects should be a key aspect of discussions for individual work-streams.
- The Post Adoption Statement should set out how mitigation measures will be developed and implemented as the Work Programme progresses.
- The information on Monitoring is very brief, and it would be helpful if further detail could be provided in the Post Adoption Statement.

Appendix 1: Relevant plans, programmes and strategies

The Historic Environment Policy for Scotland (HEPS) should be reviewed and added to the relevant plans, programmes and strategies for the historic environment.

Appendix 5 Statutory mechanisms for the protection of designated areas

For information, the summary columns for scheduled monuments and listed buildings should be amended to clarify that in the absence of planning permission, there is no statutory mechanism etc.

None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Virginia Sharp who can be contacted by phone on 0131 668 8704 or by email on Virginia.Sharp@hes.scot.

Yours faithfully

Historic Environment Scotland



Annex A: detailed comments on the environmental effects and mitigation

The table below contains our detailed comments on the environmental assessment findings and mitigation measures identified for the individual development types. The table includes only those development types and / or alternatives on which we have specific comments. We are broadly content to agree with the findings in relation to those not included below.

Chapter title	Table title	Comments on effects identified	Comments on mitigation
Digital communications infrastructure	New ground based masts	<ul style="list-style-type: none">• The <i>Key Issues</i> summary suggests that effects on the historic environment will be reversible. Whilst this may be the case for effects on setting, direct effects, particularly on archaeology, will frequently be permanent in nature.• The assessment has found that effects on listed buildings will be neutral, on the basis that effects would be identified and addressed through the listed building consent process. Whilst this is applicable to direct (physical) effects, the listed building consent process does not apply to development which affects the setting of listed buildings. In view of this, the assessment should be updated to provide findings on the likely effects on the setting of listed buildings (within both Designated and Non-Designated Areas).• It is important to recognise that changes to PDR which affect Designated Areas may also have effects on other heritage assets that are located within the Designated Area. This includes undesignated assets (for instance, unknown archaeology within an Inventory battlefield) and also applies to the setting of B and C listed buildings within designated areas. It is not clear whether the assessment	Prior notification / prior approval subject to the condition that before beginning development an assessment of visual impacts is undertaken addresses effects on setting, but is of limited use in mitigating direct (physical) impacts, as these are not likely to be captured by an assessment of visual impact alone.



Chapter title	Table title	Comments on effects identified	Comments on mitigation
		<p>has considered potential effects on undesignated heritage assets and the setting of B and C listed buildings within Designated Areas.</p> <ul style="list-style-type: none">• The assessment has found effects on undesignated heritage assets to be minor. It would have been helpful if the narrative had explained why these effects were found to be minor rather than significant. There are several factors that could lead to such effects being significant. These include: the potential for the sensitivity of non-designated or unknown heritage assets (particularly archaeology) to be greater than assumed, as their cultural significance may not yet be known or fully known; the likelihood of direct effects on undesignated archaeology being permanent and of high magnitude; the scope for cumulative direct effects on non-designated heritage assets to be significant as a result of the likely frequency and permanence of effects on a nationwide scale. In view of this, and on the basis of the information provided, we consider that the level of significance of effects on undesignated heritage assets is uncertain, with the potential to be significant, and that following the precautionary principle appropriate mitigation measures should be explored.	
	Changes to existing ground based masts	<ul style="list-style-type: none">• The <i>Key Issues</i> summary suggests that effects on the historic environment will be reversible. Whilst this may be the case for effects on setting, direct effects, particularly on archaeology, will frequently be permanent in nature.• The assessment has found that effects on listed buildings will be neutral, on the basis that effects would be identified	



Chapter title	Table title	Comments on effects identified	Comments on mitigation
		<p>and addressed through the listed building consent process. Whilst this is applicable to direct (physical) effects, the listed building consent process does not apply to development which affects the setting of listed buildings. In view of this, the assessment should be updated to provide findings on the likely effects on the setting of listed buildings (within both Designated and Non-Designated Areas).</p> <ul style="list-style-type: none"><li data-bbox="815 571 1626 906">• It is important to recognise that changes to PDR which affect Designated Areas may also have effects on other heritage assets that are located within the Designated Area. This includes undesignated assets (for instance, unknown archaeology within an Inventory battlefield) and also applies to the setting of B and C listed buildings within designated areas. It is not clear whether the assessment has considered potential effects on undesignated heritage assets and the setting of B and C listed buildings within Designated Areas.<li data-bbox="815 948 1626 1345">• The assessment has found effects on undesignated heritage assets to be minor. It would have been helpful if the narrative had explained why these effects were found to be minor rather than significant. There are several factors that could lead to such effects being significant. These include: the potential for the sensitivity of non-designated or unknown heritage assets (particularly archaeology) to be greater than assumed, as their cultural significance may not yet be known or fully known; the likelihood of direct effects on undesignated archaeology being permanent and of high magnitude; the scope for cumulative direct effects on non-designated heritage	



Chapter title	Table title	Comments on effects identified	Comments on mitigation
		assets to be significant as a result of the likely frequency and permanence of effects on a nationwide scale. In view of this, and on the basis of the information provided, we consider that the level of significance of effects on undesignated heritage assets is uncertain, with the potential to be significant, and that following the precautionary principle appropriate mitigation measures should be explored.	
	Antenna systems on buildings (other antenna systems)	<ul style="list-style-type: none">The assessment has found that effects on listed buildings will be neutral, on the basis that effects would be identified and addressed through the listed building consent process. Whilst this is applicable to direct (physical) effects, the listed building consent process does not apply to development which affects the setting of listed buildings. In view of this, the assessment should be updated to provide findings on the likely effects on the setting of listed buildings (within both Designated and Non-Designated Areas).	
	Antenna systems on buildings (dish antennas)	<ul style="list-style-type: none">The assessment has found that effects on listed buildings will be neutral, on the basis that effects would be identified and addressed through the listed building consent process. Whilst this is applicable to direct (physical) effects, the listed building consent process does not apply to development which affects the setting of listed buildings. In view of this, the assessment should be updated to provide findings on the likely effects on the setting of listed buildings (within both Designated and Non-Designated Areas).	



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	Equipment housing cabinets (ground based)	<ul style="list-style-type: none">• The <i>Key Issues</i> summary suggests that effects on the historic environment will be reversible. Whilst this may be the case for effects on setting, direct effects, particularly on archaeology, will frequently be permanent in nature.• The assessment has found that effects on listed buildings will be neutral, on the basis that effects would be identified and addressed through the listed building consent process. Whilst this is applicable to direct (physical) effects, the listed building consent process does not apply to development which affects the setting of listed buildings. In view of this, the assessment should be updated to provide findings on the likely effects on the setting of listed buildings (within both Designated and Non-Designated Areas).• It is important to recognise that changes to PDR which affect Designated Areas may also have effects on other heritage assets that are located within the Designated Area. This includes undesignated assets (for instance, unknown archaeology within an Inventory battlefield) and also applies to the setting of B and C listed buildings within designated areas. It is not clear whether the assessment has considered potential effects on undesignated heritage assets and the setting of B and C listed buildings within Designated Areas.	
	Equipment housing on buildings	<ul style="list-style-type: none">• The assessment should be updated to include findings on the likely effects on the setting of listed buildings.	



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	Other apparatus on buildings	<ul style="list-style-type: none">The assessment should be updated to include findings on the likely effects on the setting of listed buildings.	
	Underground development	<ul style="list-style-type: none">The assessment should be updated to include findings on the likely effects on archaeology within the setting of A listed buildings.	
	New access tracks for ground based masts	<ul style="list-style-type: none">The assessment has found effects on undesignated heritage assets to be minor. It would have been helpful if the narrative had explained why these effects were found to be minor rather than significant. There are several factors that could lead to such effects being significant. These include: the potential for the sensitivity of non-designated or unknown heritage assets (particularly archaeology) to be greater than assumed, as their cultural significance may not yet be known or fully known; the likelihood of direct effects on undesignated archaeology being permanent and of high magnitude; the scope for cumulative direct effects on non-designated heritage assets to be significant as a result of the likely frequency and permanence of effects on a nationwide scale. In view of this, and on the basis of the information provided, we consider that the level of significance of effects on undesignated heritage assets is uncertain, with the potential to be significant, and that following the precautionary principle appropriate mitigation measures should be explored.The assessment has found that effects on listed buildings will be neutral, on the basis that effects would be identified and addressed through the listed building consent process. Whilst this is applicable to direct (physical) effects, the	



Chapter title	Table title	Comments on effects identified	Comments on mitigation
		listed building consent process does not apply to development which affects the setting of listed buildings. In view of this, the assessment should be updated to provide findings on the likely effects on the setting of listed buildings (within both Designated and Non-Designated Areas).	
	Secondary, cumulative and synergistic effects	<ul style="list-style-type: none">It is not clear from the narrative whether cumulative, secondary and synergistic effects on undesignated or unknown archaeology have been considered. In light of our comments on this in relation to individual development types in this context, we recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
Town centre changes of use			We note that no mitigation measures have been identified in relation to the assessment of effects as a result of town centre changes of use.
	Polytunnels	<ul style="list-style-type: none">The assessment has not taken into consideration the direct (physical) effects that polytunnel development may have on the historic environment, particularly archaeology. Works to erect polytunnels (including fixing the structures into the ground and ancillary underground works such as the installation of irrigation systems) cause soil disturbance which could have significant negative permanent effects on archaeology.	We recommend that mitigation measures addressing potential effects on the historic environment are identified for this development type, both in relation to the no change and



Chapter title	Table title	Comments on effects identified	Comments on mitigation
		<ul style="list-style-type: none"><li data-bbox="817 263 1624 399">• Polytunnel development would also be likely to have direct effects on the character of Gardens and Designed Landscapes and Battlefields, as well as non-designated historic landscapes.<li data-bbox="817 438 1624 805">• It is not clear why negative effects which have been identified for the historic environment are considered to be minor in scale, with a further reduction in significance attributed to the temporary and reversible nature of effects. We consider that there are likely to be significant effects on the historic environment from this type of development. In addition, whilst the development type is considered to be temporary, the likely frequency with which polytunnels may be seasonally re-erected at the same or adjacent locations reduces the extent to which the effects identified will be temporary.<li data-bbox="817 845 1624 1284">• We note that the introduction of PDR for polytunnels will provide clarification on the need for planning permission for this type of development. We consider that this may have positive effects for the historic environment in areas where polytunnel development has previously not been subject to planning permission, as it will increase the number of developments that are subject to scrutiny, with associated opportunities for mitigation. However, there may also be increased negative effects in areas where polytunnels have been subject to planning permission. Identification of effective mitigation measures for negative effects on historic environment assets is also likely to enhance any positive effects resulting from the introduction of PDR.	<p data-bbox="1657 263 1915 327">introduction of PDR options.</p> <p data-bbox="1657 367 1915 702">Identification of effective mitigation measures for negative effects on historic environment assets is also likely to enhance any positive effects resulting from the introduction of PDR.</p>



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	Farm steadings	<ul style="list-style-type: none">• We agree that it is uncertain that negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.• The assessment narrative does not address effects on the setting of listed buildings and scheduled monuments, or upon undesignated archaeology which may be in close proximity to historic farm steadings.	
Micro-renewables (domestic and non-domestic)	Domestic solar panels (on dwellinghouses)	<ul style="list-style-type: none">• The assessment narrative does not explore the impacts on the setting of listed buildings that might result from extension of PDR into the curtilage of listed buildings.	
	Domestic solar panels (on flats)	<ul style="list-style-type: none">• The assessment narrative does not explore the impacts on the setting of listed buildings that might result from extension of PDR into the curtilage of listed buildings.	
	Agricultural buildings (for the erection and/or extension of buildings for energy from burning biomass; energy from anaerobic digestion or biomass	<ul style="list-style-type: none">• For clarification, listed building consent would be required for works which affected a listed building or structures within its curtilage. This means that development within the curtilage which does not affect structures that are considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44	



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	or storing biomass)	<ul style="list-style-type: none">It is important that the assessment based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	
	Forestry buildings (for the erection and/or extension of buildings for energy from burning biomass; energy from anaerobic digestion or biomass or storing biomass)	<ul style="list-style-type: none">For clarification, listed building consent would be required for works which affected a listed building or structures within its curtilage. This means that development within the curtilage which does not affect structures that are considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44It is important that the assessment based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	
	Industrial buildings (for the erection and/or extension of buildings for	<ul style="list-style-type: none">For clarification, listed building consent would be required for works which affected a listed building or structures within its curtilage. This means that development within the curtilage which does not affect structures that are	No measures have been identified to mitigate significant negative effects on cultural heritage.



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	energy from biomass and storage of biomass, including flues for biomass)	<p>considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44</p> <ul style="list-style-type: none">It is important that the assessment is based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	We recommend that mitigation should be sought, and when identified the ER amended to reflect this.
Non-domestic solar energy	Non-domestic solar panels installed on a pitched roof	<ul style="list-style-type: none">The assessment narrative does not refer to the minor positive effect expected to result in an extension of PDR to World Heritage Sites which is identified in the assessment matrix.The assessment should recognise that the current restrictions on PDR for this development type do not necessarily provide planning control over developments affecting the setting of scheduled monuments, listed buildings or affecting Inventory battlefields.	
	Non-domestic solar panels installed on a flat roof	<ul style="list-style-type: none">The assessment narrative does not refer to the minor positive effect expected to result in an extension of PDR to World Heritage Sites which is identified in the assessment matrix.	



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		<ul style="list-style-type: none">The assessment should recognise that the current restrictions on PDR for this development type do not necessarily provide planning control over developments affecting the setting of scheduled monuments, listed buildings or affecting Inventory battlefields.	
	Non-domestic solar panels installed on an external wall	<ul style="list-style-type: none">The assessment narrative does not refer to the minor positive effect expected to result in an extension of PDR to World Heritage Sites which is identified in the assessment matrix.The assessment should recognise that the current restrictions on PDR for this development type do not necessarily provide planning control over developments affecting the setting of scheduled monuments, listed buildings or affecting Inventory battlefields.	
District heating and supporting infrastructure	District heating		The measures identified focus on designated historic environment assets. However, this will not provide mitigation of significant effects on undesignated / unknown archaeology that lies outside those areas.



Chapter title	Table title	Comments on effects identified	Comments on mitigation
Energy storage (non-domestic)	Energy storage (non-domestic)	<ul style="list-style-type: none">The <i>Key Issues</i> summary suggests that effects on the historic environment will be reversible. Whilst this may be the case for effects on setting, direct effects, particularly on archaeology, will frequently be permanent in nature.	The mitigation proposed does not include measures to address the potential significant negative effect on undesignated heritage assets.
Development relating to active travel	PDR for route creation PDR for route surfacing PDR for docking stations for e-bikes PDR for other developments to support sustainable travel PDR for docking stations for e-bikes	<ul style="list-style-type: none">The assessment has found effects on historic environment assets to be minor. It would have been helpful if the narrative had explained why these effects were found to be minor rather than significant, in particular in relation to the creation of new routes.	No measures to mitigate negative effects on the historic environment have been identified.
Habitat pond creation	PDR for habitat pond creation for wildlife purposes on	<ul style="list-style-type: none">It would have been helpful if the narrative had explained why these effects were found to be minor rather than significant. We agree that it is uncertain that negative effects will be minor, and consider that there is the possibility that such effects may be significant.	The measures identified focus on designated historic environment assets. However, this will not provide



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	agricultural land (excluding stocking with fish)		mitigation of significant effects on undesignated / unknown archaeology that lies outside those areas, or on the setting of designated heritage assets.
Peatland restoration	Peatland restoration	<ul style="list-style-type: none">It would have been helpful if the narrative had explained why negative effects were found to be minor rather than significant. We agree that it is uncertain that negative effects will be minor, and consider that there is the possibility that such effects may be significant.	The measures identified focus on designated historic environment assets. However, this will not provide mitigation of significant effects on undesignated / unknown archaeology that lies outside those areas, or on the setting of designated heritage assets.
Allotments and community growing schemes	PDR for change in use of land for allotments and community growing schemes	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	PDR for perimeter fencing for allotments and community growing schemes	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	PDR for sheds and composting toilets	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	PDR for greenhouses and polytunnels	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	PDR for communal huts or clubhouses	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	PDR for car parking / vehicular and loading areas	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	

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	PDR for water and drainage systems	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	PDR for portable buildings and containers	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
Householder developments	Single storey ground floor extensions	<ul style="list-style-type: none">It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	It is not clear how the proposed mitigation would address significant effects on the setting of designated heritage assets.



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	Ground floor extensions of more than one storey	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	It is not clear how the proposed mitigation would address significant effects on the setting of designated heritage assets.
	Porch	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the	It is not clear how the proposed mitigation would address significant effects on the setting of designated heritage assets.



Chapter title	Table title	Comments on effects identified	Comments on mitigation
		<p>assessment findings and mitigation updated where appropriate.</p> <ul style="list-style-type: none">• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	Roof enlargement	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	It is not clear how the proposed mitigation would address significant effects on the setting of designated heritage assets.



Chapter title	Table title	Comments on effects identified	Comments on mitigation
	Access ramps	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why negative effects of extending PDR in conservation areas undesignated buildings were found to be minor rather than significant, particularly as both the scoring and some of the narrative in the assessment matrix suggests it would be significant. On this basis we consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings other that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	Improvements or alterations that are not enlargement	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been	



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		<p>considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.</p> <ul style="list-style-type: none">• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	
	Ancillary buildings	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively across the country.• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	It is not clear how the proposed mitigation, which focuses on Conservation Areas, would address significant effects on other heritage assets.



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		<ul style="list-style-type: none">For clarification, listed building consent would be required for works which affected a listed building or structures within its curtilage. This means that development within the curtilage which does not affect structures that are considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44It is important that the assessment is based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	
	Any building, engineering, installation or other operation	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	It is not clear how the proposed mitigation, which focuses on Conservation Areas, would address significant effects on other heritage assets.



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	Hard surfaces	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively.• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the	It is not clear how the proposed mitigation, which focuses on Conservation Areas, would address significant effects on other heritage assets.



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		<p>assessment findings and mitigation updated where appropriate.</p> <ul style="list-style-type: none">• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.• For clarification, listed building consent would be required for works which affected a listed building or structures within its curtilage. This means that development within the curtilage which does not affect structures that are considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44• It is important that the assessment is based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	
	Decking and raised platforms	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects on undesignated buildings were found to be minor rather than significant. We consider that	It is not clear how the proposed mitigation, which



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		<p>it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively.</p> <ul style="list-style-type: none"><li data-bbox="815 400 1599 568">• It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.<li data-bbox="815 608 1621 807">• It is not clear from the narrative why effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas are considered to not be significant. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.<li data-bbox="815 847 1630 1182">• For clarification, listed building consent would be required for works which affected a listed building or structures within its curtilage. This means that development within the curtilage which does not affect structures that are considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44<li data-bbox="815 1222 1599 1350">• We recommend that the assessment should consider the likelihood of decking which is adjacent to, but not directly attached to, a listed building being considered to not require Listed Building Consent by the local authority.	<p>focuses on Conservation Areas, would address significant effects on the setting of designated heritage assets.</p>



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		<ul style="list-style-type: none">It is important that the assessment is based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	
	Gates, fences or other enclosures	<ul style="list-style-type: none">It would have been helpful if the narrative had explained why some negative effects were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively.It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.For clarification, listed building consent would be required for works which affected a listed building or structures	It is not clear how the proposed mitigation, which focuses on Conservation Areas, would address significant effects on other heritage assets.



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		<p><i>within</i> its curtilage. This means that development within the curtilage which does not affect structures that are considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44</p> <ul style="list-style-type: none">• It is important that the assessment is based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	
	Appearance of flats	<ul style="list-style-type: none">• It would have been helpful if the narrative had explained why some negative effects were found to be minor rather than significant. We consider that it is uncertain that those negative effects will be minor, and consider that there is the possibility that such effects may be significant, particularly cumulatively.• It is not clear from the narrative whether effects on designated historic environment assets and/ or their settings that are situated outside Conservation Areas have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	It is not clear how the proposed mitigation, which focuses on Conservation Areas, would address significant effects on other heritage assets.



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		<ul style="list-style-type: none">For clarification, listed building consent would be required for works which affected a listed building or structures within its curtilage. This means that development within the curtilage which does not affect structures that are considered by the local authority to be listed through curtilage would not require listed building consent. More information on this can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=34c90cb9-5ff3-45c3-8bc3-a58400fcbc44It is important that the assessment is based on a clear understanding about the difference between the curtilage of a listed building, and the setting of a listed building. More information about setting can be found here: www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549	
Electric vehicle charging infrastructure	PDR for electrical outlets mounted on walls	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the assessment findings and mitigation updated where appropriate.	The mitigation measures proposed do not address potential negative effects on the setting of listed buildings.
	PDR for upstands with electrical outlets	<ul style="list-style-type: none">It is not clear from the narrative whether effects on undesignated or unknown archaeology have been considered. We recommend that this is clarified, and the	The mitigation measures proposed do not address potential negative effects on the



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		assessment findings and mitigation updated where appropriate.	setting of listed buildings.