



Evelix Cottage,

Dornoch

IV25 3RD

21st April 2014

To Lewis McNaughton,

Dear Sir,

North of Scotland Archaeological Society's response to the Call for Evidence on The Historic Environment Scotland Bill.

Thank you for including our Society in your Call for Evidence. We responded to a similar call for comments on the Review of the Royal Commission for the Ancient and Historic Monuments of Scotland on 4th February 2012. Many of our comments remain the same with reference to the Bill.

1. We welcome the commitment to continue the involvement of the people of Scotland in their historical environment. There are several mentions of the need for outreach and community involvement. [14 sub section 2(c); 23 sub section 5 (b), 5 (c) Explanatory notes on HER Bill]. To date RCHAMS has been very successful with their outreach programme. Scotland's Rural Past, for example, has been inspirational to many communities and engaged many people with their historic environment. As a community group we look forward to continuing our association with the members of the new body, Historic Environment Scotland.
2. We also welcome the retention of the control of the collections by the new body. It would be especially helpful if there was more emphasis on increasing the availability of the records on line. Increased accessibility to the general public would raise awareness of the historic environment and would be of great value to planners in avoiding accidental damage to irreplaceable archaeological remains
3. In line with 2 it is disappointing to note the language of 18 sub section 4(a) and 19 sub section 4(b). For over 10 years NOSAS has been in discussion with RCHAMS, Historic Scotland and Highland Council trying to achieve the compatibility of locally held monument records with nationally held records. There is an urgent need for the transfer of records between the various bodies for planning authorities among others. The need for this has been identified by 26 sub section 5(e) but we would hope that the word 'might' could be replaced 'will' in the final sentence.
4. Concern has been expressed by some members that there has been no strengthening of protection of archaeological sites which have not been accorded Scheduled status. The local authorities have some power of protection however given the huge number of unscheduled sites and low number of local authority archaeologists it is difficult to enforce. A number of structures do not require planning permission (agricultural buildings, forestry tracks). The potential for the damage of unique sites continues to be very high.

5. The period of '14 days notice' before any member of the new body can visit a site could be seen as a loophole in the legislation allowing damage to occur during the interim. As far as I understand it is a change to the present situation and it is disappointing that access will only be allowed after a substantial period of notice.
6. Although not written into the Bill it is to be hoped that the new body will consult and involve the people who produce the 'woodland expansion strategy', wind farm expansion plans and local development plans, farm policy and other influential planning bodies when producing its own inaugural strategic plan.

We hope these comments are useful and would be happy to provide oral evidence if required.

Yours faithfully,

Anne Coombs

NOSAS Chair.