

Marie Ferguson
Scottish Executive Development Department
Planning Division
Area 2-H
Victoria Quay
Edinburgh
EH6 6QQ

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PUBLIC PARTICIPATION IN ENVIRONMENTAL IMPACT ASSESSMENT CONSULTATION PAPER

HEACS (Historic Environment Advisory Council for Scotland) is pleased to have the opportunity to comment on the consultation document proposals.

HEACS is the advisory body which advises Scottish Ministers on the Historic Environment.

HEACS welcomes the general drift of the proposals and considers that the approaches outlined are consistent with public participation requirements.

HEACS particularly welcomes the proposals which extend the concept of 'the public' to include NGOs and the provisions which will allow NGOs to initiate judicial review, where considered appropriate.

HEACS is generally concerned that environmental impact studies tend to overlook the historic context of the environment. HEACS would recommend that guidance, which is issued with regulatory frameworks, should contain a specific reminder of heritage issues within environmental impact studies. HEACS would recommend that Historic Scotland be asked to provide this.

HEACS would express some concern at the too-ready assumption/statement that planning authorities are already coping with much of the regulatory impact and that the transposition into legislation can be accomplished within existing resources of manpower and at de minimus cost.

Specifically, in the light of the proposals relating to forestry, HEACS would doubt that the Forestry Commission is able to cope with the additional work in quite the easy fashion indicated.

HEACS would therefore recommend that the Scottish Executive revisit the assumptions of financial and human resources within the sectors affected by the legislative transposition.

Yours sincerely

Elizabeth K Burns CMG OBE
Chair