Consultation

Did you take part in the consultation exercise which preceded the Bill and, if so, did you comment on the financial assumptions made?
Submitted responses to the consultations on the Historic Environment Strategy for Scotland and on the merger of Historic Scotland and the Royal Commission on the Ancient and Historic Monuments of Scotland. Did not comment on the financial assumptions made.

Do you believe your comments on the financial assumptions have been accurately reflected in the FM?

Did you have sufficient time to contribute to the consultation exercise?
Yes

Costs

If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.
The Financial Memorandum notes that ‘HES will be working with local authorities to manage the transition to the new system and to build capacity within local authority partners.’ The memorandum also notes that there will be ‘process changes required for local authorities to administer regulatory consents for designated items’. Building Capacity within local authority Planning services, even with the assistance of HES, will have resource implications for Councils; subsequently maintaining and servicing the role that local authorities will be required to play, and dealing with the processes changes to be introduced will also have implications, potentially financial for Councils. Whilst the memorandum notes that these ‘processes changes are moving in line with those elsewhere in the planning system’ cumulatively these changes will have an impact on the work of Planning Authorities.

Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?
No Comment on the figures provided in the document.

If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?
The Council will be obliged to meet any costs in order to fulfil its statutory role in respect of the Historic Environment. However the fee regime for planning applications must be kept under review to ensure that it properly reflects the costs of providing the service.
Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise? No comment.

Wider Issues
Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?
See above.

Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?
Without knowing what future legislation may be forthcoming difficult to predict.