



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email: scotplan@gov.scot

Scottish Government

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300037931

19 February 2021

Dear Planning and Architecture Division

NATIONAL PLANNING FRAMEWORK 4 - POSITION STATEMENT

Thank you for the opportunity to comment on Scotland's Fourth National Planning Framework (NPF4) Position Statement.

A lot of the issues identified in our [response to the Call for Ideas](#) have been included in the expression of the aims of a new spatial strategy, and as potential policy changes. We are very pleased to see this and glad that our advice so far has been helpful.

We are particularly pleased that the Position Statement recognises that the historic environment can deliver some of the Framework's wider aims – as set out in the key outcomes of the Position Statement. This is in addition to having value in contributing to better, greener places.

This approach aligns strongly with our knowledge, understanding and aspirations for the historic environment. We would welcome the opportunity to work with you in the further development and delivery of the Framework. We can provide evidence in the form of research currently underway or planned, and case studies that align with the delivery of the key outcomes.

We look forward to providing further information and evidence to support the preparation of the plan as it continues to develop.

Integrating good heritage management

We welcome your intention that NPF4 will maintain, strengthen and clarify existing historic environment policies, and align them with both [Our Place in Time](#) and the [Historic Environment Policy for Scotland](#) (HEPS). We would like to be involved in this work as it is key to our role within the planning system and to the work of the wider sector.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



Good management of the historic environment and its component parts (including designated and undesignated heritage assets) is central to the delivery of economic, social, environmental and wellbeing outcomes, especially through place-based planning and action.

We are keen to work with you to make sure that the policies developed for NPF4 are aligned with HEPS and will lead to development that will achieve the Framework's key outcomes. The policies will have to be detailed to support good plan and decision-making and give decision-makers clarity at various levels. They will have to reflect the value of heritage in its own right, as well as recognise that it is an enabler across principal policy areas.

Our response

We have set out our comments on the cross-cutting themes, the spatial strategy and proposed policies below. These identify areas where heritage can add value and enable successful delivery of the Framework. In each section we have identified the issues we support and the areas where we consider further work is needed.

The [annex](#) to this letter gives our detailed response to the consultation questions.

Meeting net-zero emissions

Supported issues

1. The commitment to **planning for net-zero emissions**.
2. Strengthening the principle of **retaining and reusing existing buildings** to maximise the use of the embodied energy of our building stock.

Areas for further development

We agree that the policy position for appropriately located renewable energy developments as part of a whole-systems low-carbon energy mix should continue. This approach would be strengthened by a taking plan-led, infrastructure first approach to their siting.

We welcome the proposals to promote nature-based solutions within the spatial strategy of NPF4. The historic environment is part of our environment and it is potentially vulnerable to damage from these actions. We would support a plan-led approach to the implementation of nature-based solutions that takes a holistic approach. This will ensure that the risk of unintended consequences for the historic environment is reduced. In this way large-scale implementation of nature-based actions will be truly sustainable.

Planning for resilient communities

Supported issues

1. Recognising the need for **place-based approaches** which provide more opportunities for people to be involved in the development of their neighbourhoods. This includes implementing 20-minute neighbourhoods. This concept aligns with traditional patterns of living and localism.



2. The commitment to **embed the Place Principle** within NPF4 and to encourage greater use of the Place Standard Tool. These are key tools which allow people to get their voices heard in the planning system.
3. Recognising that the redevelopment of existing **historic buildings and places can provide a catalyst for regeneration**, improve the public realm, create new jobs and foster community cohesion. More needs to be done with communities to understand our historic sites places and how they are valued. This will also improve our shared awareness and understanding of histories and cultures that have been unheard and under-represented.
4. Bringing forward good opportunities for **quality homes in places that would benefit from them**. This includes ensuring good design and reuse of historic buildings is at the heart of delivering homes.

Areas for further development

NPF4 should take a more holistic view of what is considered 'natural infrastructure'. Much of our blue/green infrastructure already exists, for example in the form of canals which are historic assets. They can add to sense of place, support climate change challenges and provide active travel corridors. To maximise these benefits, they must be sensitively managed.

Delivering a wellbeing economy

Supported issues

1. Recognising that **heritage and culture can support aspirations for a well-being economy** and for our collective identity. Good heritage management can support place-based change. It can be a catalyst for economic regeneration, generate skills development, and attract additional investment – increasing land values. In turn, this can provide confidence to invest and act as an incubator for innovation. Including the aims of [A Culture Strategy for Scotland](#) within NPF4 will help to achieve this.
2. The need for a **collaborative approach to spatial planning** at national, regional and local levels. This will be important in achieving a Green Recovery from the impacts of the pandemic. The historic environment has a key role to play in this approach.
3. The emphasis on **improving communities' health and wellbeing**. A Culture Strategy for Scotland places culture at the heart of Scotland's wellbeing and cultural, social, economic and environmental prosperity.
4. The development of **sustainable tourism**. We welcome the commitment to build on the Rural Tourism Infrastructure Fund.

Areas for further development

The new spatial strategy will be partly based on natural capital approaches. The historic environment is generally not well captured in natural capital and ecosystems services methodologies. This misses the fact that the historic environment provides many of the habitats which are often described as 'natural'.



The implementation of any spatial strategy on this basis will need to take a holistic approach. It must recognise the influence of traditional land management practices on ecosystems services and our natural capital.

Achieving better, greener places

Supported issues

1. Recognising **the importance of our historic environment** in its own right, and as an asset that can help with the delivery of wider policy ambitions. The historic environment can contribute to the four outcomes identified for NPF4. We welcome the commitment to consider the policies to be included within NPF4 in relation to the [Historic Environment Policy for Scotland](#). We would be happy to contribute to this work.
2. Recognising that **embedding the Place Principle and the Place Standard Tool** will help to support the delivery of better, greener places.
3. Prioritising and incentivising the **reuse of vacant and derelict land and buildings**. Many of these have heritage values that can be used creatively to deliver regenerated places.
4. Rebuilding the **resilience of rural and island communities** and harnessing their historic and cultural distinctiveness.

Areas for further development

Landscape forms part of the character of and the backdrop to our places. Recognising this helps us to plan for better, greener places, and to manage change sensitively. NPF4 should recognise that our landscapes have an inherent historic dimension as they have been modified by people, over time. This includes areas identified as ‘wild land’.

Any review of wild land policies should take a holistic view of our landscape and acknowledge that many of its qualities now considered to be ‘natural’ are in fact a product of the intervention of people, over time.

We note the intention to consider whether Heritage Impact Assessment should be made mandatory for all listed building consent and conservation area applications. It is unclear what benefit this policy change is anticipated to achieve that is not delivered by existing mechanisms. We would be happy to discuss this further.

Ensuring successful delivery of the strategy

Supported issues

1. Taking an **infrastructure-first approach** to development. This could be further strengthened if this approach is underpinned by the policy principle of the ‘right development in the right place’, as part of a plan-led system.
2. Including **heritage policies in NPF4**. In response to the Call for Ideas we supported the continuation of existing land use planning policies for the historic environment. We welcome the intention for these to be aligned with HEPS. These policies should give clear direction to planning authorities and others who apply them when giving advice and



making decisions. As these are developed over the coming months, we would like to contribute by engaging with Scottish Government and other stakeholders.

Areas for further development

A wide range of materials, skills and training will be needed to help ensure the successful delivery of the strategic priorities and outcomes of the Framework. Some of these may currently be in short supply and this is a potential risk to the delivery of NPF4. The position statement does not mention this.

During the development of NPF4, skills requirements and potential gaps should be considered. This must align with relevant national and regional economic strategies to ensure that skills development is taking place across Scotland at the scale and pace required to secure implementation of NPF4 policies.

One example of this is the potential policy change of retaining and reusing existing buildings. This will require a range of skilled and specialist roles and a steady supply of appropriate materials.

Planning authorities will need to be well resourced to deliver the aims of the place-based approaches set out in the Position Statement. The Key Agencies Group is currently developing a cross-agency approach to placemaking. This can help to support the delivery of complex or large-scale developments and can help to build in environmental solutions and placemaking principles from the outset.

Greater collaboration and partnership working will be required to deliver the NPF4 outcomes. We recommend that forms a fundamental part of your delivery strategy.

We hope this is helpful. We are keen to work with the you and others, to ensure that the historic environment plays a crucial role in the further development and ultimate delivery of the key outcomes as set out in the Framework.

If you would like to discuss this or any of our comments in more detail, please contact Adele Shaw on 0131 668 8758 or adele.shaw@hes.scot.

We look forward to working collaboratively with you over the coming months.

Yours faithfully

Graham Saunders
Head of Heritage Management Policy



ANNEX: RESPONSE TO CONSULTATION QUESTIONS

We welcome the opportunity to comment on the NPF4 Position Statement. We broadly agree with the thinking set out in the document - both the new spatial strategy and the proposed policy changes.

The statement recognises that the historic environment is an enabling asset in delivering the four outcomes, and this is one of its strengths.

The historic environment is part of the environment. The historic environment and its values have the potential to be a 'golden thread' in the Framework. As a cross-cutting enabler between different policy areas, it can help to deliver the actions and outcomes identified in NPF4.

This response builds on some of the evidence that we supplied to the Scottish Government in our [response to the Call for Ideas](#). We have highlighted some of the areas where we can see that the historic environment can aid the delivery of both the spatial strategy and the proposed policy changes included in the Position Statement.

We have also highlighted areas where we think further development is needed and we can provide further evidence to support your work.

I. Do you agree with our current thinking on planning for net-zero emissions?

The Position Statement recognises the need for urgent action to achieve a net-zero Scotland. We welcome this, and the links made between NPF4 and the Land Use Strategy. These are the overarching plans that will guide long-term decisions on the use of land in Scotland. We agree that joined-up action at regional level will be important in working towards a net-zero Scotland.

Spatial strategy

We broadly support the thinking on planning for net-zero emissions and its commitments in the NPF4 Position Statement. We welcome the opportunity to offer further information and advice on how and where the historic environment can be successfully integrated into these commitments.

Supported issues

Facilitate design solutions and innovation

We support planning policies which will help to deliver the very significant reductions in emissions from buildings that will be needed to achieve a net-zero Scotland.

We are embarking on an ambitious research project to understand both the embedded and operational carbon which exists in our pre-1919 building stock. The research will take a whole-systems approach looking at how renewables could contribute additional carbon savings, the



need for and availability of low-carbon and locally sourced materials. The project will also address the skills required to deliver the scale and speed of retrofit required to achieve the necessary emissions reductions.

We would like to work with the Scottish Government in developing this project which will provide a sound evidence base for the implementation of policies on this topic within NPF4.

[Integrate land use and transport](#)

We support embedding the [National Transport Strategy 2](#) (NTS2) Sustainable Travel Hierarchy in decision-making. It will be important for NPF4 to set the context for sustainable tourism and to enable visitors to make sustainable travel choices.

[Areas for further development](#)

[Deliver infrastructure to reduce emissions](#)

We support continuing the policy position for appropriately located renewable energy developments as part of a whole-systems low-carbon energy mix. This would be strengthened by a taking plan-led, infrastructure first approach to their siting. This approach is highlighted in the Position Statement the Resilient Communities outcome. It would also be successful in planning for our energy needs.

We support the existing policy approach in Scottish Planning Policy paragraph 28 of the right development in the right place: not development at all costs. Spatial frameworks for onshore wind farms, including those to be repowered, should be based on a brownfield first approach. This should include the availability of grid connections.

This approach would support the further deployment of this technology while balancing the need for environmental protection.

[Promote nature-based solutions](#)

We support the proposals to promote nature-based solutions within the spatial strategy of NPF4. These actions are likely to be required on a large scale. We would therefore support a planned approach to such interventions. This should include peatland restoration, tree planting and measures to address soil disturbance.

NPF4 should set the context for a planned and holistic approach to the implementation of these measures. This will help to reduce the risk of unintended consequences for the historic environment, which is a finite and non-renewable resource. This approach will help to ensure that these actions are truly sustainable.

A good example of this is peatland restoration. Restoration has the potential to deliver benefits to the climate, but can be damaging to archaeology. We are beginning a research project to understand the impacts that peatland and wetland restoration will have on the historic environment across Britain and Ireland up to 2030. The project has partnership from Historic England, Cadw, Northern Ireland, and the Republic of Ireland. We would be happy to share the findings of this research with you as it develops.



Potential policy changes

Changes supported

We support the following changes:

- supporting the use of materials with low embodied emissions that can act as an emissions store and to reuse materials where possible
- an infrastructure first approach to implementing the NTS2 Sustainable Travel Hierarchy

We support and have further advice on the changes below.

Strengthening support for retaining and reusing existing buildings

We are developing a suite of research which will seek to help support the achievement of net-zero for pre-1919 dwellings. This work will evidence the least impactful full life carbon retrofit approach for average pre-1919 dwellings – and its estimated costs, affordability, materials and skills requirements and gaps.

Ultimately the findings are intended to support climate change policy and local and national retrofit policies and programmes. This will provide evidence for local and national government to support investments, quick wins and best practice for pre-1919 dwellings whilst delivering wider social, community and environmental benefits.

We would be happy to engage further with you on this research.

Updating the spatial framework for onshore wind

NPF4 should move World Heritage Sites from Group 2 of the table to Group 1. The World Heritage Sites in Scotland have a strong landscape context which puts them on a par with National Scenic Areas. HES, UNESCO and the advisory bodies to the World Heritage Convention (ICOMOS, IUCN and ICCROM) recognise these sites globally as ‘the best of the best’ and worthy of the highest level of protection.

2. Do you agree with our current thinking on planning for resilient communities?

The Position Statement recognises the need for place-based approaches which provide more opportunities for people to be involved in the development of their neighbourhoods.

The historic environment can often stimulate the regeneration of places. It can improve our public realm, bring our historic buildings back in to reuse, create new jobs and stimulate the local economies. Heritage assets can also contribute to Community Wealth Building. This is a developing area of our work and we would be happy to share our findings with you in due course.



We know, for example, that between 2007 and 2019 the first eight rounds of our [Conservation Area Regeneration Scheme](#) (CARS) have:

- funded the repair of 1026 historic buildings
- improved approx. 79,000 sq. m of public realm
- brought back into use approx. 43,000 sq. m of vacant floor space
- supported approx. 270 new businesses
- created approx. 600 new jobs
- generated approx. £122.3 m of new investment

Spatial strategy

We broadly support the commitments in the NPF4 Position Statement and have offered further information and advice where the historic environment can be successfully integrated into these commitments.

Supported issues

Apply the concept to 20-minute neighbourhoods

This concept aligns with many traditional patterns of settlement and living. We would be happy to feed into your work exploring how this concept could work in different parts of Scotland – in urban, rural and island areas.

Strengthen community resilience

We welcome recognition of the need for approaches to placemaking that reflect local diversity and regional characteristics.

Actively plan and support the delivery of good quality homes

In our view to sustain rural communities, development must focus on existing settlements where possible. Place-based approaches to the development of these areas should support new development to ensure the viability and vibrancy of existing town centres and smaller settlements. We support recommendation 12 of the [Rural Planning to 2050](#) report which states:

NPF4 should promote an approach to planning which links the three goals of conserving of the natural and historic environment, responding to the climate emergency and sustaining more resilient rural communities.

Much can be learned about sustainable patterns of development from the historic environment. The siting and placement of historic places often has a strong relationship to landscape features; traditional buildings and materials have been designed to address their local climate.

Older homes are also often designed to fit a specific environment. Features like steep roof pitches and deep window and door rebates help to protect against cold, wind and rain. Space standards in traditional buildings often give good light levels and ventilation.



Promote inclusion and equality and eliminate discrimination

Investment in the historic environment through planned coordinated action has stimulated the regeneration of places. This has subsequently instilled and enhanced a sense of place and civic pride by local communities.

This has been achieved through early and continuous engagement with communities – to understand what is important to them before introducing change.

This includes capturing tangible and intangible heritage values. These values are often key to the distinctiveness of a community and its places. This includes narratives that have been less heard and understood. We know that heritage can challenge us and make us question things about our society. These less-shared stories are key to increasing our understanding.

An example of how this can be done is demonstrated in HES's project [Past Forward - stories of Urban Scotland](#), engaged with approximately 10,000 people from diverse backgrounds, in 60 communities across Scotland.

Areas for further development

The Position Statement refers to blue/green infrastructure as being 'natural'. This is not always the case.

Existing features including heritage assets can form part of blue/green infrastructure. The protections that have been brought through historic environment legislation have played a part in ensuring this infrastructure continues to deliver multiple benefits.

For example, the protection and promotion of the canal network, and our gardens and designed landscapes and historic battlefields have all influenced how we manage our land resources. [Glasgow's Smart Canal](#) utilises the Forth and Clyde Canal – a heritage asset built 250 years ago - as a way of mitigating flood risk and unlocking 110 hectares of land for regeneration across Glasgow.

We are also aware of small-scale projects supported by the Scottish Government such as the Kinross Rainforest Project, which seeks to embed blue/green infrastructure in existing settlements and wider areas. We would welcome the opportunity to provide support on such projects where the historic environment is a component part.

Potential policy changes

Supported issues

We support the following changes and have further advice which may be helpful.



Promoting innovative, place-based solutions to reflect a new approach to localism that includes 20-minute neighbourhoods

We would encourage an infrastructure first basis to this to ensure that the ongoing use or reuse of existing assets are factored into this approach.

Proactively bringing forward good opportunities for quality homes in places that would benefit from them

There is clear evidence that we are not making effective use of our existing housing. This has a consequential effect on housing supply and affordability.

The National Records of Scotland shows that 3% of all of Scotland's dwellings are vacant. The [housing condition survey](#) found that 75% of all dwellings have some degree of disrepair. Approximately 40% of buildings on [the Buildings at Risk Register for Scotland](#) are residential. This is the largest group in the Register.

A significant volume of housing could be brought back into the marketplace through reuse, repair and maintenance. This will only happen if we have a sufficiently robust policy framework that prioritises the use and sympathetic adaptation of our existing building stock – in our cities, town centres, rural areas and island communities.

Promoting multifunctional blue/green infrastructure

As part of this potential policy change, it will be important to recognise that some of our blue and green infrastructure already exists and has recognised heritage values. This was demonstrated in the [Glasgow Smart Canal](#) project, where forward planning and consideration of the site's heritage assets was integrated into the aim of delivering place-based regeneration and wider connectivity.

3. Do you agree with our current thinking on planning for a wellbeing economy?

Our recent research into the [historic environment and wellbeing](#) revealed that most respondents reported high wellbeing and health scores on engagement with the historic environment:

- 74% of respondents reported high levels of life satisfaction
- 79% reported high levels of feeling worthwhile
- 69% reported high levels of feeling happy
- 78% said their health was good

The research also found that engagement with the historic environment led to other perceived benefits. These included connections with place; learning about, looking after, and being inspired by Scotland's heritage; feeling part of Scotland's story.

Words used to describe feelings about the historic environment, include pride, inspired and interested/interesting. People noted the historic environment brings perspective to individuals' lives and concerns and offers a connection to a much bigger, older story.



We also know from [Scotland's Historic Environment Audit](#) that the historic environment generated £4.2bn for Scotland's economy in 2017. This increased from £3.4bn in 2014.

The historic environment supports 66,000 full time-equivalent jobs. It involves at least 17,000 volunteers – bringing shared benefits to individuals, organisations and communities. This can lead to economic impact through skills development and improved future employability.

The historic environment has much to offer in the delivery of a wellbeing economy. It enhances connections between people and place; it can bring perspective and inspiration.

Heritage can also challenge us and make us question things about our society. It can shed light on aspects of our past that have been hidden. Sometimes these aspects of our past will make us uncomfortable, but it is important to acknowledge these issues as we look to shape our future. NPF4 should help to set the context for an inclusive decision-making framework for how we look after our heritage, in line with the principles of HEPS.

Spatial strategy

Supported issues

We support the following changes and have further advice which may be helpful.

Support a sustainable and green economic recovery

A collaborative approach to spatial planning at national, regional and local levels which be important in achieving a Green Recovery from the impacts of the pandemic.

The historic environment has a key role to play in helping to achieve a net-zero Scotland. We have already highlighted some of the ways that the historic environment can play a part in achieving net-zero.

We are currently preparing a statement on Green Recovery. This will highlight the ways that the historic environment can be an enabler in achieving the Scottish Government's net-zero targets. We would be happy to share this with you in due course.

Reduce inequality and improve health and wellbeing

As demonstrated in our recent research, engagement with the historic environment can lead to improved health and wellbeing. We support the intention to strengthen the economies of our diverse cities and towns, and to enable development that supports a vibrant rural economy. We also agree that it is important to take a place-based approach and to involve communities in decision-making.

Support sustainable tourism development

Support for tourism will be critical in efforts to rebuild the sector in a more sustainable way in the aftermath of the global pandemic. We outlined our approach to sustainable tourism in our Call for Ideas response. Further information on the ways we are implementing and promoting sustainable



tourism can be found in our [Climate Action Plan](#). We are reflecting on these principles as we plan how to rebuild our visitor business in a sustainable way.

NPF4 should support geographical spread of visitors to avoid pressure on infrastructure in certain areas. As the largest operator of paid-for visitor attractions in Scotland, we know the impact our sites can have in economic development, often in rural and island communities. The importance of local community collaboration and integration of the localism agenda should be recognised in NPF4.

Stimulate culture and the creative industries

The Position Statement recognises the importance of creativity, culture and the arts to our collective identity. We welcome this and the acknowledgement that this is reflected in our architectural, social and economic history. We support the commitment to ensure that culture is better reflected in NPF4.

[A Culture Strategy for Scotland](#) places culture at the heart of Scotland's wellbeing and cultural, social, economic and environmental prosperity. This includes our historic environment, which is central to our national identity, as well as being a key driver for delivering successful placemaking projects.

A Culture Strategy for Scotland also highlights the role of culture in giving people a greater say in shaping their communities. Community ownership can help to protect our rich cultural heritage. We recommend that the aims of the culture strategy are incorporated more fully into the place-based approaches advocated in the Position Statement.

Areas for further development

The new spatial strategy will be based on natural capital approaches. The historic environment is generally not well captured in natural capital and ecosystems services methodologies. This is despite its role in providing many of the habitats which are considered 'natural'.

In our Call for Ideas response we raised specific concerns about the way this approach considers the historic environment through cultural service provision. We are developing our understanding of how the historic environment can be represented more fully in Ecosystems Services Methodologies and in Natural Capital Accounting. The developing spatial strategy should take account of the contribution the historic environment makes to these decision-making frameworks. We would be happy to share our work with you to support the emerging spatial strategy.

Potential policy changes

Supported issues

We support the following changes:

- Promoting a place-based approach to investment across all development plans in line with the Infrastructure Investment Plan, the priorities of the Scottish National Investment Bank and the recommendations of the Advisory Group on Economic Recovery.



We support the following changes and have further advice which may be helpful.

[Supporting development that can demonstrate its contribution to a wellbeing economy and fair work](#)

The management, protection and conservation of the historic environment is a source of skilled jobs and rewarding work. It requires a wide range of skills including, but not limited to – traditional joiners, lime plasterers, gardeners, surveyors and archaeologists. The Position Statement does not mention the role of skills in the delivery of the four outcomes. We recommend that this is addressed in your delivery plans. Our [Skills Investment Plan for Scotland's Historic Environment Sector](#) will provide you with information on the skills challenges and opportunities for the historic environment sector.

[Ensuring that NPF4 links with the vision, objectives and framework of Scotland's upcoming third Land Use Strategy](#)

We are working with the Scottish Government's Land Use Strategy team to ensure that this better reflects the historic environment. The historic environment is a finite resource, and it is highly susceptible to changes in land use and land management.

It is vital that land use strategies and management regimes encourage stewardship of the historic environment. To do this well, they must recognise the historic contribution to landscapes, habitats and ecosystems, and the joint benefits from sustainable land management. NPF4 should also recognise these links.

[Revisiting the interface between terrestrial and marine planning to ensure that policy reflects the more recent developments in marine planning](#)

[Scotland's National Marine Plan](#) provides the context for the historic environment of our coastal and marine areas. NPF4 should ensure that there are appropriate links between these plans.

[Encouraging the expansion of tourism and associated infrastructure in an inclusive and sustainable way](#)

As noted above, we are reflecting on the principles of sustainable tourism as part of our planning for recovery from the effects of the pandemic and its specific effects on the tourism industry. We welcome the commitment to build on the Rural Tourism Infrastructure Fund.

[Reflecting the importance of cultural facilities of different types of places, such as city and town centres and more rural communities](#)

We welcome the steer that NPF4 will give to stimulating more creative approaches to placemaking and regeneration through the use of vacant spaces or in animating public spaces. Many of these will include our traditional buildings and historic places.

In our response to the Call for Ideas, we provided a detailed response to the Town Centres topic paper which addresses these issues. We would be happy to discuss this further to ensure that the character and diversity of our places is retained.



4. Do you agree with our current thinking on planning for better, greener places?

Spatial strategy

We broadly support the commitments in the NPF4 Position Statement and have offered further information and advice where the historic environment can be successfully integrated into these commitments.

Supported issues

Focus on place-based outcomes

We agree that the Place Principle should be embedded within NPF4. This will help to ensure that the spatial strategy focuses on the qualities and character of our places. Much of this character comes from the historic environment, and we welcome the commitment to ensure that this is not lost in the delivery of wider objectives.

We welcome recognition that protecting our natural and cultural heritage should form the foundations of a place-based approach to future development. We note that the spatial strategy will support existing successful places.

Some of these places may have been helped to retain their character and distinctiveness through our Conservation Area Regeneration Scheme (CARS) funding or through Townscape Heritage Initiatives. It would be beneficial to reflect on what went well for these areas when considering how to support places that have not served their communities as successfully.

Re-imagine city and town centres

We welcome the commitment to continue to embed the Town Centre First principle. As noted in our response to the Call for Ideas, Scotland's city and town centres will need to be supported in their recovery from the pandemic.

We agree that the policy responses outlined in the Position Statement will help to support the revitalisation of our city and town centres. We welcome the further development of the Framework so that it builds on the findings of the recently published [A New Future for Scotland's Town Centres](#). This recent report highlighted the value of town centres in offering a social, cultural and economic heart for communities (paragraph 6):

They contain a shared built environment heritage and spaces that, with the right conditions, provide an inclusive and sustainable centre.

Reuse vacant and derelict land and empty buildings

We outlined a number of issues that will need to be taken into account in relation to vacant and derelict land in our response to the Call for Ideas. We are continuing to work with the Key Agencies Group to develop better approaches to addressing vacant and derelict land.



Successful approaches should facilitate solutions for these sites, and address long-term impacts on community and the wider historic environment, while also ensuring that the cultural significance that of some of these areas have is protected.

One option identified in the Position Statement is to explore incentives to help bring vacant and derelict land and dilapidated buildings back into active use. Many of these sites and buildings will have opportunities for enhancement and cultural and heritage value that should be carefully considered and incorporated into any plans for change. We would welcome the opportunity to be part of these discussions.

In our response to the Call for Ideas, we highlighted that local authorities need the tools and resources to repair and bring empty buildings into use for housing where appropriate. We gave the example of the recent Compulsory Purchase of a Category C listed detached house at Roseangle in Dundee as a successful example of where such powers have been used.

NPF4 should support additional measures for tackling buildings at risk as part of its wider strategy for revitalising vacant and derelict land. One option would be to introduce Compulsory Sale Orders. These provisions could play an important role in helping to bring land and properties onto the market and support ambitions to regenerate and bring historic buildings, structures, vacant, derelict and empty land back into productive use.

Actively promote working and living in rural Scotland and the islands

Scotland's islands are characterised by the richness of their cultural heritage and the culture and creativity generated and experienced by local communities today. The [Islands Plan](#) states that for many of the islanders who took part in the consultation, their sense of self and their sense of community is rooted in the culture and heritage of the island they live on.

In our response to the Call for Ideas we noted our support for the delivery of Strategic Objective 11 of the National Islands Plan, to support arts, culture and language. We have also noted, above, that the Rural Planning to 2050 report provides a clear steer on approaches to rural planning.

Protect our historic buildings and places

Our historic environment is not just buildings and places. Scotland's landscapes and environments are almost entirely a product of millennia of human interaction.

Past land management has developed our soils and archaeological deposits act as a reservoir for carbon and nutrient capture – as well as preserving evidence of our past communities. The historic clearance of forests led to the formation of habitable and farmable places, and also had unintended consequences. These include widescale peat growth and subsequent land management practices, such as waterway creation and manipulation. Food production has historically involved drainage, creation of fields, grazing regimes and woodland planting.

All of these actions have formed our physical surroundings and ecosystems. This has created the landscapes which contribute to Scotland's places, communities, wellbeing and identities. It also



contributes to tourism. Historic Environment Scotland and NatureScot's joint position statement [People, Place and Landscape](#) sets out our joint vision for the management of our landscapes.

Adapt our coastline to the impacts of climate change

Coastal erosion has significant potential to impact on our valued coastal heritage assets. [Dynamic Coast: Scotland's Coastal Change Assessment](#) is providing case studies that include developing adaptation plans for vulnerable stretches of coast. These show how we may be able to protect the places we value in future, including our coastal scheduled monuments and World Heritage Sites.

Potential policy changes

Supported issues

We support the following changes:

- Aligning the strategy with the Land Use Strategy and identifying opportunities to align emerging Regional Spatial Strategies with future Regional Land Use Partnership Frameworks.
- Prioritising the use of vacant and derelict land ahead of greenfield land through a 'brownfield first' approach.
- Incentivising the imaginative and sustainable reuse of vacant and derelict land and buildings, and ensuring heritage values are carefully considered and incorporated.
- Looking at delivery mechanisms to enhance the viability for development on vacant sites.
- Enabling the continuing use, or reuse where appropriate of historic buildings.

We support the following changes and have further advice which may be helpful.

Broadening the mix of uses in town centres.

We support the proposals to reuse empty properties and gap sites and to harness the energy of the cultural and historic environment in supporting town centre regeneration.

Rebuilding the resilience of rural and island communities.

We have highlighted elsewhere the key role that culture and heritage plays in these areas and it will be essential that these aspects are retained in implementing this policy.

Clarifying policies on locally important built and natural assets where required.

Our forthcoming guidance [Talking about Heritage](#) will help communities to identify for themselves the land and buildings that are important to them as part of the Local Place Planning process.

Maintaining, strengthening and clarifying our policies for the historic environment.

We would be happy to support you in this work to ensure the full draft provides enough direction for the management of our historic environment and strengthens its role as an enabler to delivering other key policy areas.



Areas for further development

Strengthening the links between development proposals and the wider sustainable land use objectives, contributing to the outcomes of Scotland's Environment Strategy

We strongly recommend that the role of the historic environment is factored into this policy area. As noted above, Scotland's environment has been altered by people, over time and that continues today. We have also noted above how the historic environment is a reservoir for many natural capital and ecosystem services.

NPF4 should recognise these links to ensure that a holistic approach is taken to planning for actions under a wider sustainability agenda.

Considering whether Heritage Impact Assessment should be mandatory for all listed building and conservation area applications

The intention underpinning this potential policy change is not clear from the Position Statement. It is unclear what benefit this policy change is anticipated to achieve that is not delivered by existing mechanisms. We would be happy to discuss this further.

5. Do you have further suggestions on how we can deliver our strategy?

Principles and policies

It is important to restate in the Framework the core principle of the right development in the right place as part of a plan-led system. This aligns with the holistic approach of achieving sustainable development that considers economic, social and environmental dimensions.

The potential policies to be adopted within NPF4, including the potential changes, should be sufficiently detailed to ensure that they can be implemented in decision-making at local level.

Good practice and guidance

Good practice currently contained within Scottish Planning Policy should be retained: this sets the context for placemaking at an appropriate scale. For example, we have found that local authority led development frameworks can help to set overarching placemaking principles that guide later masterplanning.

Existing supporting guidance and advice notes will have to be updated to be in line with the Framework's spatial strategy and policy changes. Two clear examples where this will be necessary for historic environment issues are PAN71 and 2/2011.

The commitment to these updates should be clearly expressed. This includes setting out a timetable for the updates, as well as reassurances that the work will be undertaken in collaboration with relevant agencies and experts. In addition, where there is a known gap in advice to enable successful interpretation and application of the Framework, a further commitment should be made on what these policy areas are, when they will be prepared, and with whom.



Other strategies

It is not yet clear how the Framework will be delivered alongside other strategies such as those related to skills provision and investment. Due to the ambitious and cross-cutting nature of the Framework, skilled resources will be needed to ensure successful delivery.

HES has developed a Skills Investment Plan for Scotland's Historic Environment Sector. This was developed in conjunction with Skills Development Scotland. It provides a framework for improving access and upskilling others into heritage, in response to the current and future demands of the sector. This type of approach or links to such initiatives could be embedded into the Framework. This would help to ensure appropriate application of the spatial strategy and policies, which will in turn enable the delivery of its key outcomes.

Investment

Finally, in the spirit of collaboration, the Framework should provide a structure for sign posting and coordinating investment strategies as led by interested parties (public and private bodies). This could include clarity on where investment should be directed, from which sources and for what purposes, so that together specific spatial strategies such as regenerating town centres, are successfully delivered.

For example, HES through its CARS place-based programme has generated £122.3m of new investment, often achieved through active partnership working with local authorities and other key agencies. This approach could be upscaled and applied to multiple agencies, and private sector, if instilled in the Framework as a delivery mechanism.

6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

We generally support the Integrated Impact Assessment Update Report.

7. Do you have any other comments on the content of the Position Statement?

Clarity of meaning and terminology, and its consistent application throughout the Framework is essential. At the moment, 'culture', 'cultural heritage' and 'the historic environment' are used interchangeably. Issues like these could present problems of interpretation and create difficulties for clear decision-making.

A way forward is to ensure the next iteration of the Framework contains a definition section to help avoid potential misinterpretation of key wordings. This should include a definition for the historic environment that captures both designated and undesignated heritage assets, and which aligns with recognised legal definitions.



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

We would welcome further and continuous engagement with Scottish Government on the development and ultimate delivery of NPF4, and its supporting advice notes. This could include providing further evidence to support the direction of spatial strategies and policy proposals – possibly in the form of current or planned research, and/or case studies as a tool in which to demonstrate what the Frameworks outcomes could and in some case do look like.

Historic Environment Scotland
19 February 2021