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By email: scotplan@gov.scot;
sea.gateway@gov.scot

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Dr Fiona Simpson
Scottish Government
Planning & Architecture
Victoria Quay
Edinburgh
EH6 6QQ

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

ann.macswen@hes.scot

T: 0131 668 8778
Our case ID: 300037931

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Dear Fiona

National Planning Framework 4 – Draft Plan and Environmental Report

Thank you for the opportunity to provide our views on the draft of Scotland's Fourth National Planning Framework (NPF4) and its accompanying Environmental Report. Our advice on these documents focuses on our main area of interest for the historic environment.

We offer these comments on behalf of Historic Environment Scotland (HES). HES is the lead public body set up to investigate, care for and promote Scotland's historic environment. We are responsible for leading and enabling the delivery of Scotland's historic environment strategy, [Our Place in Time](#) (2014). Our priorities are set out in our corporate plan, *Heritage for All* (2019).

Historic Environment Policy for Scotland

The preparation of all plans in Scotland should be considered through the policies and principles within the Historic Environment Policy for Scotland (HEPS). Of most relevance to the NPF4 is Policy HEP3:

Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment.

Our following comments consider how the draft NPF4 performs against this overarching national policy for Scotland's historic environment.

General comments

Many of the issues identified in our response to both the [Call for Ideas](#) and [Position Statement](#) have been addressed in draft spatial strategy and proposed policies. We are pleased to see this and understand that our advice so far has been helpful.

We are particularly pleased that the draft NPF4 recognises that the historic environment can help deliver some of the framework's wider aims. The historic environment contributes to better, greener places. Beyond this, it will be part of our response to the climate emergency and the biodiversity crisis, and it will help to deliver other aspects of the strategy. This approach aligns well with our knowledge, understanding and aspirations for the historic environment.

But we believe NPF4 can go further than this. The sustainable management of our historic environment helps to deliver many of the outcomes of NPF4. NPF4 could recognise these connections throughout the spatial strategy, within the universal policies and within other aspects of the framework where culture and heritage can make an important contribution to the purpose of planning.

Our views

We have set out our responses to some of the questions in the following sections of our response. [Part 1](#) focusses on the spatial strategy, [Part 2](#) on the candidate national developments and [Part 3](#) on the national planning policy handbook. Each part also looks at the environmental implications as described in the Environmental Report. We have also given some comments on the delivery costs and benefits as outlined in the partial Business and Regulatory Impact Assessment.

All our comments focus on those areas where we believe heritage can add value and enable successful delivery of the framework. We have also identified some of the key issues we support and the areas where we consider further work is needed.

Finally, we have provided some advice on the delivery of some national developments. We look forward to working with The Scottish Government, Scottish Futures Trust, fellow Key Agencies, and others in the creation of the Delivery Programme.

Next steps

We strongly support the ambitions outlined in the draft NPF4 and are committed to working with all partners in its delivery. We would be happy to provide further views and clarify any of the points we have made in this submission.

We can also 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 NPF4's delivery programme as it continues to develop.

We strongly support the ambitions outlined in the draft NPF4 and are committed to working with all partners in its delivery. If you would like to discuss any of our comments in more detail, please contact Ann MacSween on 0131 668 8778 or ann.macsween@hes.scot.

Yours sincerely

Elizabeth McCrone
Director of Heritage

Part I – A National Spatial Strategy for Scotland 2045

18. National Spatial Strategy. What are your overall views on this proposed national spatial strategy?

We support the spatial strategy expressed in Part 1 of the framework. We welcome the focus on creating sustainable, liveable, productive and distinctive places.

Outcomes for the historic environment are very clearly set out under the Distinctive Places theme, and we welcome this.

Our heritage and culture can support outcomes for sustainable and liveable places. The draft strategy does not acknowledge this fully and it is weaker because of this. The Sustainable and Liveable Places policies in Part 3 recognise the contribution of the historic environment to some extent. These links can be made stronger.

Our response highlights opportunities to take a more holistic and inclusive approach throughout the spatial strategy, national developments, and policy areas.

Using what we already have

Making best use of existing buildings, infrastructure and places plays a key part in Sustainable Living. At Historic Environment Scotland, we champion the use and adaptation of our historic assets for the benefits this brings for communities across Scotland.

Using what we already have promotes energy efficiency and is a key component of the circular economy and sustainable living. Buildings contribute to emissions throughout their whole lives: when we build, maintain, use and demolish them. Maintaining and adapting existing buildings is greener than building new and will be crucial for Scotland's net-zero targets.

Making best use of what we already have also helps to maintain the unique historic character of our rural areas, villages, towns and cities. Repairing, restoring and reusing historic assets does this in a sustainable way. Heritage-led regeneration can also drive investment, jobs and tourism. This can lead to happier, healthier communities with a strong sense of local identity.

Learning from the past

We can also learn a lot 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 are designed to address their local climate. Older homes are 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.

The values and outcomes that can be realised through our culture and heritage are not confined to the creation and management of Distinctive Places.

Part 2 – National developments

19. Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?

The draft NPF4 is accompanied by significant supporting material. A lot of this material focuses on how the numerous candidate national developments have been considered. We welcome this open and transparent approach. We acknowledge the significant work that has gone into undertaking the integrated impact assessment.

The side effect of this is that the introductory text for this section of the document is not as clear as it was in National Planning Framework 3. The text should make it clear what additional assessments and consenting processes will be needed for the national developments.

There is a clear opportunity within NPF4 to take a place-based and plan-led approach to the delivery of the national developments. This would be particularly helpful where for groups of potential developments which do not have specific and defined development areas. Examples of this are [ND7 – Islands Hub for Net Zero](#) and [ND12 – strategic renewable energy development and transmission infrastructure](#).

This approach would ensure that the developments deliver multiple benefits for communities and the environment, including the historic environment. This should help to align their delivery with the spatial principles set out on page 10 and to meet the six qualities of successful places set out on page 72.

20. Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

Yes, the level of information provided in the statement of need provides a helpful overview of the national developments. This is particularly important for the developments that are a collection or network of proposals. We have provided comments around the deliverability of [specific developments](#) and their [alternatives](#) in Part 3 of this response.

We look forward to working with Scottish Futures Trust and others to maximise the opportunities these proposals bring. This work will include reducing risks to their delivery as they go through the relevant consenting processes.

We do not have any specific comments on the principle of any of the candidate national developments. We support National Development 5 and our more detailed comments on this are below.

National Development 5 – Circular Economy Materials Management Facilities

We welcome this development for several reasons. It has the potential to deliver significant benefits for both net zero ambitions and the maintenance of or historic assets and places.

To deliver on the aims of a policy that promotes the ongoing use and adaptation of our existing assets, both materials and skills must be available. This is true, for example, for the hierarchy of development set out in the newly launched [Infrastructure Investment Plan](#).

This makes it particularly important to recognise the importance of circular economy principles within the construction industry. We welcome the fact that NPF4 acknowledges this. We recommend that you provide more information on the potential range and scope of the materials management facilities. This should emphasise the opportunities for material storage and reuse in building repair, maintenance, and construction.

Materials facilities

Materials facilities could play a significant role in delivering greater sustainability in the construction and demolition industries. They can also deliver wider benefits around skills, placemaking and the maintenance and repair of our historic environment.

For example, stone is a very valuable and reusable resource. It can often be removed from a building if it is bonded with lime mortar. Lime mortar is soft and allows for its down take without causing damage to it. Separating out the old lime mortar through deconstruction means it can be crushed and recycled. This makes a good soil conditioner to balance the pH of soils, making them less acidic.

Historic timber can also be reused. It is often higher quality than is available today so can be particularly useful. Slates from roofs also have a very long life and can easily be reused. This is particularly important because no Scottish slate quarries are still active. This means sourcing second-hand slate for repairs is essential to maintain existing buildings.

Comparable policies

In Scotland, Aberdeen City Council's Our Granite Heritage Policy in their Local Development Plan is a good example of this approach. The policy recognises the sustainable practice and desirability of reusing granite in replacement schemes for buildings and features where there is no way to retain the existing building.

Internationally, the city of San Antonio has made deconstruction mandatory for all buildings built before 1920.

Recommendation

We recommend that if a building built before 1919 cannot be retained, it should be subject to a requirement that it is deconstructed. This should only happen when all other options for the future of the building are exhausted, unless there are exceptional circumstances. Deconstruction will release valuable construction materials for future uses. This would facilitate the sustainable reuse of materials for the maintenance, repair and construction of our built environment.

Part 3 – National Planning Policy

22. Sustainable Places. We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet’s sustainable limits. Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

We support these universal policies, which identify the key cross-cutting issues that will affect all planning decisions. We understand that the policies build on the existing Principles and Policies contained within Scottish Planning Policy (SPP).

It is not clear how these policies relate to the other policies in NPF4. In particular, decision-makers will need to know how they should weight them relative to other policies. If they should have a different weight from the rest of the policies in NPF4, this will need to be set out in guidance. Otherwise, there is the risk of conflict with the other policies in part 3 of the framework.

The other option is to give all the policies in part 3 equal weight. If this is the intention, we recommend including a clear statement on the purpose of the universal policies. This should explain how to balance and apply them in the round.

All stakeholders in the planning process will need clarity and certainty on this issue. Communities affected by development, and the public more broadly, will be particularly invested in this area. It will need to be fully transparent and clearly explained.

23. Policy 1: Plan-led approach to sustainable development. Do you agree with this policy approach?

We agree that Scotland should continue to take a plan-led approach to sustainable development. We welcome the restatement of this long-standing policy principle.

We recommend that you also include the principle of aiming for ‘the right development in the right place’ in NPF4. This is also long-standing principle currently in Scottish Planning. It is stated in three paragraphs of the SPP (15, 28 and 39). This principle makes it clear that decision-makers should not allow development at any cost.

NPF4 should clearly state that decision-makers should be apply all policies in the round. It is important to explain that while a direction is given in some areas, the overall weighting of policies is still a matter for the decision-maker.

The introductory section for the plan-led approach could also highlight the important and ongoing need for national guidance and technical advice notes. Alongside emerging guidance for Local Development Plans, we understand these will continue to play an important role in supporting planning decisions across Scotland. NPF4

could also give greater prominence to the role for Local Place Plans to help shape our places and the important contribution these make to our plan-led system.

24. Policy 2: Climate emergency. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

Yes. We agree that significant weight should be given to the climate emergency. But there is scope to include the historic environment more fully in this policy. The historic environment makes a key contribution to tackling the climate emergency and the nature crisis.

A plan-led approach is key to addressing the climate emergency. This approach could apply many of the policy areas included elsewhere in the framework.

We would welcome and work to support a plan-led approach to the deployment of renewable energy developments. The current approach is market-led. A plan-led approach would allow for a more proactive and more collaborative approach to identifying suitable areas for development. This would provide a greater degree of certainty to developers, communities and others – including statutory consultees like Historic Environment Scotland.

NPF4 is focused upon new development, and this is understandable. But it is important to recognise that 80% of buildings that will be in use by 2050 already exist today. The ways we adapt, re-use and enhance what we already have has to be part of our overall planning response to our ambitions for creating and maintaining sustainable places. We would welcome greater recognition of this throughout the framework.

25. Policy 3: Nature crisis. Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

Yes. Tackling the biodiversity crisis is crucial. Conservation of the historic environment contributes to the enhancement of biodiversity in many ways. Many endangered and protected species use traditional buildings – including bats and swifts. Historic gardens and designed landscapes support an abundance of species and habitats.

Other policies in NPF4 include important provisions for the retention and reuse of existing buildings. This will play an important role in supporting policies for tackling the nature crisis.

A major cause of the nature crisis is resource use, which is estimated to contribute to over 90% of biodiversity loss globally. This policy could recognise this issue by supporting construction materials industries in Scotland that use regenerative growing practices – such as using native timber. This should take the materials we import into account, as these can have negative impacts in the countries that produce them. The policy could actively support development proposals which

support local material industries based on regenerative and circular economy approaches.

26. Policy 4: Human rights and equality. Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

Yes. The new policy on human rights and equality reflects the discussions that took place during the passage of the Planning (Scotland) Act 2019. During this process, the Scottish Parliament gave significant attention to the need to encourage and enable public engagement with the planning system.

We welcome the clear expectation for planning authorities, applicants, key agencies and communities to consult and engage others collaboratively, meaningfully and proportionately. We are committed to working in this way. The Key Agencies Group [offer to local authorities to support Green Recovery initiatives](#) is an important example of this.

27. Policy 5: Community wealth building. Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Yes. We are pleased to see the new policy for community wealth building amongst the universal policies. We welcome the commitment to taking a people-centred approach to local economic development.

The sustainable and collaborative management of historic environment assets and places can help to realise objectives for community wealth building. We are keen to assist with the delivery of this aspect.

Our understanding from working with the Scottish Land Fund is that that over a quarter of all asset transfers they have funded since 2012 included a heritage asset. This shows the value that communities place on heritage, and the multiple roles that historic buildings can play in driving the creation of community wealth.

It is important for community wealth building to be interpreted widely. The concept should go beyond people-centred approaches to include community ownership, co-operative business models, and targeted public investment. This is an emerging and growing area of activity, so it would be helpful for NPF4 to link to the Scottish Government [Community Wealth Building webpage](#). Guidance can provide further clarity on how to deliver this policy as experience grows.

28. Policy 6: Design, quality and place. Do you agree that this policy will enable the planning system to promote design, quality and place?

Yes, we support this policy. It will help to promote design, quality and place as key factors for all planning decisions.

We believe the six qualities of successful places establish a helpful framework for testing whether proposals meet our aspirations for high quality development. We welcome the fact that the policy states that poorly designed development to not be supported. We would suggest the following additions to these six qualities. Our additions are highlighted in **bold underlined text**.

1. **Designed for lifelong health and wellbeing:** supporting safety and improving mental and physical health.

By encouraging active lifestyles, through walkable neighbourhoods, as well as ensuring equitable access for everyone (regardless of gender, age, ability and culture) to well-designed **and well-maintained** buildings and a nature-rich local environment, including quality blue/green spaces that are cared for and well maintained.

2. **Safe and pleasant:** supporting safe, pleasant and welcoming natural and built spaces **and warm homes**.

By designing, or retrofitting, spaces of all sizes and purposes to bring a sense of 'joy' and allowing people (whether individuals, families and groups) to meet safely, feel at ease, be included and feel positive towards being playful. Including climatic adaptation, shading, shelter – good use of blue and green infrastructure and wellbeing-promoting natural spaces, **trees and woodlands**, tackling vacant and derelict land, air quality and known environmental hazards.

5. **Sustainable:** supporting net zero, nature-positive, and climate-resilient places. With resource-efficient **and retrofit**, regenerative design and a sustainable environmental footprint, including through energy efficiency; integration of nature-based solutions; and resilient, confident, futureproof planning of resources, to create healthier, attractive, sustainable places to live, invest, work and play. Supporting the just transition to a net zero, nature-positive Scotland which makes best use of natural assets for communities and supports their right to a healthy environment.

We welcome the fact that NPF4 recognises the value that design tools such as Masterplans, Development briefs and Design and Access Statements can add, and the need to incorporate the key principles from guidance issues by planning authorities and statutory consultees.

We recommend you replace or accompany the term 'statutory consultees' with 'Key Agencies'. There are several agencies who are not statutory consultees but do produce helpful planning guidance in support of good placemaking. Statutory guidance is being removed, so there may be a greater role for the Key Agencies in co-producing new or updated national level guidance with planning authorities. We would welcome reference to this within the NPF4 delivery programme.

29. Policy 7: Local living. Do you agree that this policy sufficiently addresses the need to support local living?

Yes. The concept of 20-minute neighbourhoods aligns with many traditional patterns of settlement and living, with the practice of heritage-led regeneration, and it has climate action at its core.

Policy 7a should acknowledge that our historic neighbourhoods and traditional patterns of settlement make an important contribution to this policy area. Local Developments Plans should consider these contributions when they take forward the principle of 20-minute neighbourhoods.

30. Policy 8: Infrastructure First. Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

Yes. We support the aspiration for an infrastructure first approach to be embedded in the planning system. This will help to integrate the creation and maintenance of places better. It also provides opportunities to maximise and reuse existing infrastructure where possible.

Local Development Plans should play stronger role in requiring an infrastructure-first approach to the identification and allocation of land for development. They should look for ways to implement the wider definition of infrastructure introduced by the [Infrastructure Investment Plan](#). The plan takes a much more holistic view of infrastructure, by explicitly including our built environment of housing and public infrastructure such as education, health, justice and cultural facilities. We welcome this interpretation, and it would be helpful for this definition to be added to the NPF4 Glossary.

NPF4 could also highlight the important role that can be played by Asset Management Strategies across all sectors. Scottish Futures Trust is working with others to provide updated guidance on asset management. We expect this to be particularly helpful in supporting efforts to make best use of existing infrastructure.

31. Policy 9: Quality homes. Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

Yes. The focus of this policy is on the delivery of new homes. However, in some cases the provision of new homes will involve the reuse, adaptation and change of use of our existing buildings. Policy 9 should take a more holistic approach and recognise this.

Traditional buildings are particularly well suited for adapting to new uses. They have a distinct character and high-quality construction. It would be helpful to acknowledge this in Policy 9d. The policy should support proposals in principle where they include new homes that make best use of existing buildings.

33. Policy 11: heat and cooling. Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

Yes. This policy is focussed on zero and low emission heating rather than energy efficiency. On that basis we do not have any proposed changes.

The draft NPF4 does not emphasise the importance of fabric first energy actions. These are actions which reduce a building's demand for energy through changes to the building fabric, rather than focusing on the type of heating.

A significant proportion of retrofit actions are unlikely to require planning permission or will have permitted development rights. The principal levers for delivery of fabric first energy efficiency are building standards, and the forthcoming regulatory framework. However, there is still the potential to expand this policy to include provision for fabric first energy actions in the context of re-use and retrofit. If you decide to take this approach, we would be happy to assist.

34. Policy 12: Blue and green infrastructure, play and sport. Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?

Yes. We welcome these policies for blue and green infrastructure. There are opportunities for the use and enhancement of the historic environment as part of this. There are many examples where historic infrastructure has delivered multiple benefits for communities through their sustainable long-term management, reuse and renovation. Canal networks and ancient woodlands are particularly good examples of this.

It would be helpful to reference connections with the historic environment within the provisions of policy 12h. It would also be helpful to amend policy 12d to refer to cultural heritage or the historic environment alongside natural habitats and character.

37. Policy 16: Land and premises for business and employment. Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?

Yes. This policy provides a clear framework for identifying land for these uses. We welcome the need to take account historic environment assets as part of this process.

38. Policy 17: Sustainable tourism. Do you agree that this policy will help to inspire people to visit Scotland, and support sustainable tourism which benefits local people and is consistent with our net-zero and nature commitments?

Yes, however we suggest that the policy should be amended. The historic environment should be identified in this policy as a distinctive and key driver for tourism in Scotland. Tourism industry data indicates that:

- 34% of international visitors identify heritage as a main reason for visiting Scotland.

- Prior to Covid-19, Scottish heritage attractions saw around 18 million footfalls per year (this includes repeat visits).
- In 2019-20, HES welcomed 5.2 million visitors to its staffed sites across Scotland and generated £1.1 billion for the Scottish economy through heritage tourism. That amount nearly doubles when we include supply chain effects for example, it helps farmers as restaurants buy more food to meet the demand from tourists.

The policy does touch on the need for tourism uses to be sustainable and to safeguard our environmental, cultural and community assets. However, it could draw out more how tourism (planning and development) in the historic environment can be a catalyst for positive impacts. We have identified three examples where this could be made clear.

Policy 17b

This policy focuses on supporting development contributing to viability, sustainability and diversity. But this is only in an economic context. This could be widened to include the historic environment and cultural heritage assets.

Policy 17c

This policy focuses on alleviating existing pressure and preventing further adverse impacts. This could include a provision for only supporting development proposals where the development will drive positive impacts/change (economically, socio-culturally and environmentally) and the just transition to net zero.

Policy 17g

This policy refers to compatibility with the surrounding area. This could be clarified to include reference to the capacity of the natural and historic environment.

Some of the most impactful tourism initiatives have not been developments but branding and marketing initiatives. The North Coast 500 and related routes is a clear example of this. These initiatives provide significant investment in historic assets and places and wider benefits to accessibility, amenity, and footfall.

But they can also lead to detrimental impacts if infrastructure provision does not keep pace or if the ability to absorb the level of tourism is not sustainable. Both of these concepts are integral to sustainable tourism, yet the historic environment is overlooked in policy 17. Its contribution to the 'Tourist economy' only briefly mentioned within policy 28.

To resolve this, we suggest that you add a provision to policy 17g to highlight the need for development proposals to consider impacts on the natural and historic environment, and to align with priorities identified in sustainable tourism action plans.

40. Policy 19: Green energy. Do you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045?

We broadly support the aims of Policy 19. But we think they could go further. NPF4 is an opportunity to take a whole systems approach to planning for our future energy needs.

The policy framework in NPF4 should take an approach which focusses on:

- **reducing demand** – encouraging behaviour change and incentivisation of investment decisions
- **increasing energy efficiency** – supporting refurbishment and sensitive retrofit to reduce carbon emissions through refreshing a building's fabric and services equipment
- **meeting residual need from renewable technologies** – following the principle of a plan-led system as expressed in Policy 1 to ensure that energy needs are met by locating the right development in the right place

Policy 19a encourages Local Development Plans to ensure that an area's full potential for electricity and heat from renewable sources is achieved. But NPF4 does not seem to expect spatial frameworks to be developed at local level.

NPF4 should give a clear statement on this. If spatial strategies are no longer expected this would weaken this policy area. It would be likely to make it harder to achieve our targets, especially in the context of re-powering existing renewable energy developments. A planned approach to this would be particularly advantageous for all stakeholders.

Other recommended changes

World Heritage Sites should be included within policy 19c alongside National Parks and National Scenic Areas in the range of sites within which proposals for new wind farms should not be permitted. Historic Environment Scotland, 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.

In policy 19d, we suggest removing the word 'unacceptable' and replacing it with 'significantly adverse'.

Policy 19j sets out a test for solar arrays. We suggest qualifying this by amending it to say that planning authorities should be satisfied that these would not 'significantly' adversely affect the factors listed in this section. This would make the policy more consistent with policies elsewhere in NPF4, and encourage a proportionate approach.

Policy k gives a list of specific considerations which must be taken into account in the siting and design of renewable energy developments. We welcome the fact that the historic environment is included in this list.

41. Policy 20: Zero waste. Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

Yes. We support the provisions in this policy for reusing existing buildings and infrastructure, and for minimising demolition.

To deliver this policy, it will be important to address the current skills gap in the repair and maintenance of existing and traditional buildings. Our built environment assets will also have to be maintained regularly. This will prevent them getting into a state which leads to demolition.

It would be helpful for the policy to highlight the importance of material retention within existing buildings. This is especially important for pre-1919 buildings which are often built of high-quality materials. Many of these materials are now no longer available.

This change would support the policy aspirations for vacant and derelict land. This policy states that development proposals for the reuse of existing buildings should be supported, taking into account their suitability for conversion to other uses – and that demolition should be regarded as the least preferred option.

We support this approach. But to achieve these aspirations for zero waste and for tackling derelict buildings, we need a culture shift. We must put emphasis on repair and maintenance so that buildings do not become derelict in the first place.

Buildings built before 1919

The draft policy recognises that where a building cannot be retained, materials should be salvaged for reuse. This policy will play a critical role in supporting the embedding of circular economy principles in the construction and demolition industries. To strengthen this, we recommend that you include a clear policy commitment for all buildings built before 1919.

We recommend that if a building built before 1919 cannot be retained, it should be subject to a requirement that it is deconstructed. This should only happen when all other options for the future of the building are exhausted, unless there are exceptional circumstances. Deconstruction will release valuable construction materials for future uses.

This would also support the aims of National Development 5: Circular Economy Materials Management Facilities. We have offered further comment on this issue in response to the [proposed National Development in Part 2](#) of this response.

43. Policy 22: Minerals. Do you agree that this policy will support the sustainable management of resources and minimise the impacts of extraction of minerals on communities and the environment?

The policy for minerals gives clear direction on measures to safeguard communities and the environment from the impact of extraction activities. You could make this policy stronger by highlighting the essential role that locally sourced minerals, can play in supporting our economy, skills development and net zero ambitions.

The building stone industry in Scotland, and particularly natural dimension stone, generates skilled employment, especially in rural areas.

Stone used in Scotland

Research published by the British Geological Survey (BGS) in 2016 – [Scotland's Stone Industry - A Review](#) – shows that only an estimated 10% of all stone used annually in Scotland is sourced in Scotland (c 27,000 of 260,000 tonnes). This is despite an abundance of high-quality building stones.

The remaining 90% of stone used in Scotland is imported. The Draft NPF4 and policy 22 does not acknowledge the negative carbon impact that this has on the construction sector. It could also note the carbon savings that could be gained by supporting increased stone production in Scotland.

Transportation practices

Research undertaken by the Scotland's Stone Industry has highlighted transportation practices which come with significant environmental cost. Stone imported from distant countries like China, India and Brazil can still be cheaper to buy in the UK than locally quarried stone. This is normally because of relatively low labour costs and overheads in those countries, and the economies of scale that big operations can bring to bear.

But this low cost obscures the significant environmental cost of transporting such a heavy commodity over long distances. Sandstone imported into the UK from China has roughly six times as much embodied carbon as sandstone sourced in the UK.

Social and economic benefits

There are considerable social and economic benefits to be gained from a thriving natural building stone industry in Scotland. The potential market for indigenous stone in Scotland is around ten times the amount of stone produced in-country today. (This assumes that indigenous stone would be used instead of imported stone.)

The Stone Industry review went on to highlight that roughly 1,600 jobs would be created if all the stone currently imported into Scotland was produced by the Scottish stone industry.

It is also important to recognise that some extraction sites make a significant contribution to our understanding of the historic environment and our industrial heritage. Some have been recognised for this through heritage designations.

Recommendations

We would welcome an expansion of policy provisions for minerals. This should reflect the importance of supporting a sustainable building stone industry, given the important role this will play in the delivery of this policy and other aspects of NPF4. A thriving Scottish stone industry could contribute to many of the high-level aims set out in this policy. This includes supporting low carbon design, local economies and regional character and identity.

This could be achieved by an addition to the criteria in policy 22d, reflecting the policy expectations that exist in Scottish Planning Policy at paragraph 248. This highlights the importance of not imposing undue restrictions on consents at quarries for building or roofing stone. This is intended to reflect the likely intermittent or low rate of working at such sites and to highlight the importance of securing the supply of nature building stone that will be necessary for a range of development and maintenance needs.

We believe this should be restated with an additional provision for the extraction of buildings stone after policy 22e. We suggest the following wording:

f) Development proposals for the sustainable extraction of building stone should be supported where the proposal will safeguard natural building stone resources and facilitate their sustainable extraction, including the reopening of dormant quarries and securing of active sites to provide future supply.

We also recommend that policy 22a is expanded with the following wording:

Planning authorities should also facilitate the recycling and re-use of material in waste tips and construction and demolition wastes at appropriate general industrial locations or minerals sites.

46. Policy 28: Historic assets and places Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings?

The development management policies for historic assets and places need to be sufficiently detailed to support good plan and decision-making. They must also give clarity to those who will be applying them in a variety of contexts.

Policy 28 should reflect the value of heritage in two distinct ways. Heritage has a value in its own right and should be celebrated and protected on this basis. It is also enabler across principal policy areas including in the policies for sustainable, liveable and productive places where relevant.

It is important that the policies in NPF4 align with the [Historic Environment Policy for Scotland](#). NPF4 should also take a similar approach to SPP by providing more

targeted policies for the management of the historic environment. This includes recognising designations that sit within different legislative frameworks.

A small number of Local Development Plans have combined aspects of both natural heritage and historic environment policies. However, our view is that this approach can lead to confusion around how these policies should be applied. We therefore believe the broad approach outlined within the draft NPF4 is more appropriate.

We have offered advice on these points before, in our submissions on the [Position Statement](#) and [Call for Ideas](#). Many of the issues identified have now been addressed. We are pleased to see this and understand that our advice so far has been helpful.

Recommendations

Overall, we support policy 28 for Historic Assets and Places. We have identified some opportunities for individual policies to be refined. The paragraphs below suggest alternative wording for these areas. We have also set out our reasons for these changes.

In the following paragraphs on the individual sections of policy 28 we have shown added text in **bold**, and deleted text in ~~**bold with a strike through**~~.

Where we have not suggested new wording, we support the policy as drafted, and have no further comments to make.

We have also identified some areas where policies under the sustainable, liveable and productive places sections can be enhanced to account for the historic environment. For example, the policy for Liveable Places (7) does not recognise the contribution of historic assets, places and infrastructure to the concept of 20 minute neighbourhoods. Like our natural spaces, our historic assets and places play a key role in supporting healthier and flourishing communities.

We also hope that the relevant experienced groups are involved in refining the national planning policies. There are many stakeholders with significant experience in working with these policies in the consenting process. This includes community groups with an interest in how their historic environment is managed, other key agencies, planning authorities and their archaeological and conservation advisors and the development community.

We would be happy to provide further advice on the changes we have proposed as well as any feedback provided by other stakeholders.

Policy 28: Historic Assets and Places

Current policy within draft NPF4

We want to protect and enhance our historic environment, and to support the reuse of redundant or neglected historic buildings.

Our historic environment is important to many aspects of life, from defining the character of the places where we live and work, promoting a sense of belonging and cultural identity and encouraging civic participation to supporting the tourist economy. The planning system should protect and enhance historic environment assets and places and recognise their cultural heritage benefits and associated social, environmental and economic value to our national, regional and local economies, cultural identity, and for their potential to support health and wellbeing, the circular economy, and climate change adaptation.

Proposed amendment

We are not proposing any changes to this section – but see our comments in relation to Policy 28a.

Explanation

We support the introduction to policy 28 as drafted. It provides a clear overarching principle for how the historic environment should be considered in the planning system.

Policy 28a

Current policy within draft NPF4

Local development plans and their spatial strategies should identify, protect and enhance locally, regionally, nationally and internationally valued historic assets and places.

Proposed amendment

Local development plans and their spatial strategies should **support the sustainable management of this historic environment. They should reflect the policies and principles outlined in the Historic Environment Policy for Scotland and** identify, protect and enhance ~~locally, regionally, nationally and internationally~~ valued historic assets and places.

Explanation

An important reference to [The Historic Environment Policy for Scotland](#) has not been carried forward from Scottish Planning Policy. We believe this link should be retained. This does not necessarily need to sit within section a) for Local Development Plans. It could instead be incorporated in the introductory text above.

We also do not believe reference to locally, regionally, nationally and international valued assets is necessary. Categorisation in this way conflicts with the more recent approach outlined in HEPS. HEPS encourages a value-based approach that is rooted in cultural significance.

Policy 28b

Current policy within draft NPF4

In considering development proposals and projects with a potentially significant impact on historic assets or places, planning authorities should consider whether further and more detailed assessment is required to establish a shared understanding of the cultural significance of historic assets and places. This should then provide a sound basis for understanding the impact of any proposals for

change. Development proposals should also be informed by Managing Change Guidance Notes published by Historic Environment Scotland.

Proposed amendment

In considering development proposals and projects with a potentially significant impact on historic assets or places, planning authorities should consider whether further and more detailed assessment is required to establish a shared understanding of the cultural significance of historic assets and places. **This may include, for example, information held within a Historic Environment Record (HER).** This should then provide a sound basis for understanding the impact of any proposals for change. Development proposals **and decisions taken that affect historic assets and places** should also be informed by Managing Change Guidance Notes published by Historic Environment Scotland.

Explanation

It may be helpful to keep the reference to Historic Environment Records from Scottish Planning Policy. This information plays a key role in the management of Scotland's historic environment.

Managing change guidance is relevant to both the development of proposals themselves and the decisions taken on them. We have suggested how the policy wording can make this clear.

Policy 28c

Current policy within draft NPF4

Development proposals for the demolition of listed buildings or other works that adversely affect the special interest of a building or its setting should not be supported. This should only be accepted in exceptional circumstances and where it has been adequately demonstrated that all reasonable efforts have been made to retain, reuse and/or adapt the listed building.

Proposed amendment

Development proposals for the demolition of listed buildings ~~(or other works that adversely affect the special interest of a building or its setting)~~ should not be supported. This should only be accepted in exceptional circumstances and where it has been adequately demonstrated that all reasonable efforts have been made to retain, reuse and/or adapt the listed building.

Explanation

This policy should focus specifically on demolition. The phrase 'other works' refers to the need for works that may cumulatively be substantial demolition. This is clearly explained in national guidance.

Policy 28d

Current policy within draft NPF4

Development proposals for the reuse, alteration or extension of a listed building should only be supported where its character, special architectural or historic interest and setting are not adversely affected. Development proposals affecting the setting

of a listed building should also not adversely affect its character, special architectural or historic interest.

Proposed amendment

Development proposals for the reuse, alteration or extension of a listed building should only be supported where ~~its character, special architectural or historic interest and setting are not adversely affected~~ they will preserve its character, special architectural or historic interest and setting.

Development proposals affecting the setting of a listed building should preserve its character, special architectural or historic interest.

Explanation

We have proposed some minor amendments here which we believe improve clarity and reflect the intent of legislation better.

Policy 28h

Current policy within draft NPF4

Scheduled monuments are designated to secure their long-term protection in the national interest, in situ and as far as possible in the form they have come down to us. This helps to ensure their long-term protection wherever possible. Development proposals which affect scheduled monuments should only be supported where they avoid direct impacts on scheduled monuments and any adverse impacts upon their setting, unless exceptional circumstances can be demonstrated. Where it has been satisfactorily demonstrated that there are exceptional circumstances, impacts on the monument or its setting should be minimised and mitigated as far as possible. Scheduled Monuments are designated by Historic Environment Scotland (HES) and regulated through their Scheduled Monument Consent process. Development management decisions should also be informed by HES's Scheduled Monument Consents Policy.

Proposed amendment

Scheduled monuments are designated to secure their long-term protection in the national interest, in situ and as far as possible in the form they have come down to us. This helps to ensure their long-term protection wherever possible. Development proposals which affect scheduled monuments should only be supported where they avoid direct impacts on scheduled monuments and any **significant** adverse impacts upon their setting, unless exceptional circumstances can be demonstrated. Where it has been satisfactorily demonstrated that there are exceptional circumstances, impacts on the monument or its setting should be minimised ~~and mitigated as far as possible~~. Scheduled Monuments are designated by Historic Environment Scotland (HES) and regulated through their Scheduled Monument Consent process. Development management decisions should also be informed by HES's Scheduled Monument Consents Policy.

Explanation

We support the removal of reference to 'integrity of setting'. But this policy does need wording to qualify the level of impact on the setting of scheduled monuments that should not be supported. This acknowledges that a degree of impact on the setting

of scheduled monuments can be justified. This is evidenced in many planning decisions.

We have also amended the exceptional circumstances test to say that where this is met, the policy changes to focus on minimising impacts. This is in line with the second part of policy HEP4.

Policy 28i

Current policy within draft NPF4

Development proposals affecting sites within the Inventory of Gardens and Designed Landscapes should only be supported where they protect, preserve and enhance such places and do not impact adversely upon the cultural significance, character and integrity of the site; nor upon important views to, from and within them; nor upon the setting of component features which contribute to their historical, architectural, archaeological, artistic, scenic, horticultural and nature conservation interest.

Proposed amendment

Development proposals affecting ~~sites within the nationally important~~ Gardens and Designed Landscapes should only be supported where they protect, preserve and enhance **their** cultural significance, character and integrity. ~~of the site; nor upon important views to, from and within them; nor upon the setting of component features which contribute to their historical, architectural, archaeological, artistic, scenic, horticultural and nature conservation interest.~~

Explanation

A development proposal does not necessarily have to be within the boundary of a Garden and Designed Landscape to require consideration of its potential impact. This aligns with the intentions of the policy within SPP. This is currently reflected in Local Development Plans.

We have also suggested removing some of the more technical considerations that support the implementation of this policy. These are covered in the [Managing Change guidance note on Gardens and Designed Landscapes](#).

Policy 28j

Current policy within draft NPF4

Development proposals affecting sites within the Inventory of Historic Battlefields should protect and, where appropriate, enhance a battlefield's cultural significance, key landscape characteristics, physical remains and special qualities.

Proposed amendment

Development proposals affecting **sites nationally important** Historic Battlefields **should only be supported where they** protect and, where appropriate, enhance **their** cultural significance, key landscape characteristics, physical remains and special qualities.

Explanation

A development proposal does not necessarily have to be within the boundary of a historic battlefield to require consideration of its potential impact. This aligns with the

intentions of the policy within SPP. This is currently reflected in Local Development Plans.

Our other minor amendments are to improve clarity.

Policy 28k

Current policy within draft NPF4

Development proposals that extend offshore should not significantly hinder the preservation objectives of Historic Marine Protected Areas

Proposed amendment

Development proposals at the coast edge or that extends offshore should not significantly hinder the preservation objectives of Historic Marine Protected Areas

Explanation

Impacts on marine sites can occur across the terrestrial/marine interface. An example would be construction at the coast edge resulting in loss of or alteration to marine historic assets nearby. This could happen through changes in sedimentary regimes.

The draft policy wording on for Historic MPAs would only apply for development proposals that extend offshore. This could cause problems by excluding certain development types from the requirement to avoid hindering preservation objectives. This would include development types which have no offshore elements, such as construction of coastal defences, certain ports/harbours work and aquaculture shoreline infrastructure.

This was not specifically addressed in SPP previously as this was covered by the National Marine Plan and Regional Marine Plans where relevant. However, it is often covered within Local Development Plans. Given the new role of NPF4 decision-makers may now expect this to be covered at the national level.

Policy 28m

Current policy within draft NPF4

Development proposals that sensitively repair, enhance and bring back into beneficial use historic environment assets identified as being at risk should be supported. The Buildings At Risk Register (BARR) should be used to inform and guide decision making and investment within the historic environment and other placemaking activities. Planning authorities with the support of Historic Environment Scotland are encouraged to use the BARR as a focus and catalyst for heritage regeneration, as well as an aid for greater understanding and appreciation of a place's historic environment.

Proposed amendment

Development proposals that sensitively repair, enhance **and bring historic buildings identified as being at risk back into beneficial use should be supported.**

~~The Buildings At Risk Register (BARR) should be used to inform and guide decision making and investment within the historic environment and other placemaking activities. Planning authorities with the support of Historic Environment Scotland are encouraged to use the BARR as a focus and catalyst for heritage regeneration, as well as an aid for greater understanding and appreciation of a place's historic environment.~~

Explanation

Policy 28m should focus on giving a clear policy direction for historic buildings identified as being at risk. These may be identified on the buildings at risk register but may also be highlighted in other ways.

This should refer to historic buildings rather than historic environment assets. Different policy considerations are relevant for other asset types, such as those for scheduled monuments.

Policy 28o

Current policy within draft NPF4

Development proposals should avoid adverse impacts on non-designated historic environment assets, areas and their setting. Where impacts cannot be avoided they should be minimised and mitigated as far as possible.

Planning authorities should protect and preserve these resources in situ wherever feasible. Where it has been demonstrated that retention is not possible, excavation, recording, analysis, archiving and publication may be required through the use of conditions or legal obligations.

Proposed amendment

Planning authorities should protect and preserve ~~these resources~~ **non-designated historic environment assets, areas and their setting** in situ wherever feasible.

Where there is potential for non-designated buried archaeological remains to exist below a site, developers should provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have significance that is not understood and may require assessment.

Where impacts cannot be avoided they should be minimised ~~and mitigated as far as possible~~. Where it has been demonstrated that **avoidance or** retention is not possible, excavation, recording, analysis, archiving, ~~and~~ publication and **activities to provide public benefit** may be required through the use of conditions or legal obligations.

When **archaeological discoveries** are made in the course of development works, they should be reported to the planning authority to enable **agreement discussion** on appropriate inspection, recording and mitigation measures.

Explanation

Some important elements of this policy area that are currently contained within Scottish Planning Policy have been lost. They should be reintroduced.

We suggest introducing a clear policy for pre-determination evaluation. This enables mitigation options to be explored in advance and supports the deliverability of development proposals. This is explained in detail in [PAN 2/2011](#).

The policy should specifically refer to activities to provide public benefit. This encapsulates the underlying purpose of the measures that the policy lists, including excavation, recording and publication. It should give greater flexibility for both planning authorities and applicants to agree approaches to mitigation or compensation.

We suggest re-incorporating the provision around archaeological discoveries during the course of development works. We also recommend changing the word 'discussion' to 'agreement'. This reflects the fact that, in these relatively rare instances, a conclusion needs to be reached on next steps.

Amendments to the wording on impacts that cannot be avoided also brings this policy in line with part 2 of policy HEP4.

Policy 28p

Current policy within draft NPF4

When archaeological discoveries are made in the course of development works, they should be reported to the planning authority to enable discussion on appropriate inspection, recording and mitigation measures.

Proposed amendment

There is also a range of non-designated historic assets and areas of historical interest, including historic landscapes, other gardens and designed landscapes, woodlands and routes such as drove roads which do not have statutory protection. These resources are, however, part of Scotland's heritage and planning authorities should protect and preserve significant resources as far as possible, in situ wherever feasible.

Explanation

Policy 28p has been taken out of its original context when compared to where it currently sits within paragraph 150 of Scottish Planning Policy. It follows on from the pre-determination element of Policy 28o and needs to be read in that context.

We therefore recommend that the wording of Policy 28p is largely incorporated into Policy 28o. Our full [suggested text for 28o](#) is given in the relevant section above.

If you implement this change, Policy 28p will be blank. We suggest using this space to capture the important policy currently at paragraph 151 of SPP. We have given this text in full in our proposed amendment for 28p, above.

47. Policy 29: Urban edges and the green belt. Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?

Yes. We welcome this policy and the specific provision within policy 29b to support the reuse, rehabilitation and conversion of historic environment assets when considering development within urban edges and the green belt.

48. Policy 30: Vacant and derelict land. Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?

Yes. We support these policies for proactively enabling the reuse of vacant and derelict land and buildings. We particularly welcome the clear statement at policy 30e for the reuse of existing buildings and their conversion. We agree that demolition should be regarded as the least preferred option.

[Life cycle assessment by Historic England](#) of traditional building has shown that carbon emissions could be reduced by more than 60% by 2050 as a result of the refurbishment and retrofit options. This is in contrast to demolition followed by new build. Retention of traditional and historic buildings can also play a significant role in carbon sequestration in Scotland. Around a fifth of currently occupied dwellings are traditional (pre-1919) in construction, as shown by the Scottish Housing Condition Survey 2019.

In response to question 20 we highlighted the significant role Circular Economy Materials Management Facilities could play in supporting the reuse of materials for maintenance, repair and construction. This would facilitate the sustainable reuse of materials for the maintenance, repair and construction of our built environment. If policy 20 is not amended to provide for deconstruction, a similar provision should be added to policy 30e.

This would provide direction for all buildings built before 1919, unless there are exceptional circumstances, to be deconstructed in order to release these valuable construction materials for future availability.

49. Policy 31: Rural places. Do you agree that this policy will ensure that rural places can be vibrant and sustainable?

Yes. We welcome the clear support for sustainable development of rural communities.

Policy 31b identifies the need to support development proposals that support the resettlement of previously inhabited areas. We welcome this principle, but it may be helpful to provide further clarification or guidance on the factors that should influence these decisions. This should go beyond their fit with climate change mitigation targets. Other factors could include access to services, infrastructure capacity and effects on landscape character and the historic environment.

It would also be helpful to provide a definition or framework for what is meant by 'previously inhabited areas'. As it stands this could be open to wide interpretation, which may lead to unintended consequences.

Policy 31d should refer to both the natural and historic environment. For example: 'improvement or restoration of the natural environment and historic assets and places'.

50. Policy 32: Do you agree that this policy will protect and restore natural places?

Yes. We do not have any comments on this section other than to suggest it may be helpful for policy 32d to reference World Heritage Sites. Policy for managing these sites under historic assets and places, but World Heritage Sites can be recognised for their cultural value, natural values or a combination of natural/cultural values. St Kilda is an example of this.

51. Policy 33: Peat and carbon rich soils. Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?

Yes. We support this policy but suggest amending it slightly.

The introduction to policy 33 should refer to the important cultural value of soils and peatlands. The initiation of the growth of Scottish peatland happened in prehistoric times. People have interacted with peatlands for thousands of years.

Peatlands are therefore repositories of archaeological and palaeoecological information, historic cultural practices and associations, place-names, and folklore. They are not simply natural assets.

Human activity has left indelible marks on peatlands. Prehistoric and historic drainage, and peat-cutting, both began long-term degradation of ecosystems. This has led to the need for modern intervention that we see today through peatland restoration activities.

Despite this, peatland cultural heritage can be rich and well-preserved. The anaerobic nature of histosols can preserve organic archaeological material absent from other ecosystems. This makes them a unique resource.

We therefore support the provisions of this policy which recognises that soils play a crucial role in carbon storage and sequestration. We believe the policy will also support the sustainable management of our soils and help to reduce damage to this important cultural resource. This approach will reduce ongoing degradation and take a planned approach to restoration activities.

54. Do you agree with our proposed priorities for the delivery of the spatial strategy?

Yes. The success of NPF4 and wider Transforming Planning Implementation Programme will depend on the effective collaboration of a range of stakeholders.

We are committed to playing our part. We welcome the initial work by Scottish Futures Trust to facilitate discussions around the creation of the NPF4 delivery programme. We look forward to working with a range of partners in its creation and implementation.

55. Do you have any other comments on the delivery of the spatial strategy?

We welcome the attempts throughout NPF4 to recognise where there are synergies between various policy outcomes. This includes the strong connections between nature-based solutions and the stewardship of our historic environment and how we reuse and adapt existing infrastructure and the outcomes that this can support for climate adaptation.

There is further scope to strengthen these connections. NPF4 could highlight the interconnection of landscape and the historic environment in defining the character and interest of rural and urban places. This valuable connection is important when considering their sustainable futures.

Dealing with conflict

We know that it is important for NPF4 to be read holistically. We recognise that there will inevitably be conflict between some policy areas.

Some stakeholders have pointed to the relationship between the management of Historic Assets and Places and the need to develop Green Energy. There will be other areas where decision-makers will need to manage and balance a range of what can be conflicting outcomes.

Key to minimising such conflict will be meeting the policy intentions set out under policy 4. This policy acknowledges the need for engagement to be early, collaborative, meaningful and proportionate, with careful consideration given to support or concerns expressed where they are material to the decision.

Resourcing

As a sector, we need to continue raising the profile of planning and taking a corporate approach. As part of this, it is crucial that planning authorities are well resourced to deliver the aims of the place-based approaches set out in the NPF4.

Planning authorities will need increased resources required to implement the ambitions of NPF4. This will be financed by increased planning fees. We support the increased resourcing of planning authorities. But this will not benefit agencies and statutory consultees.

Key agencies and statutory consultees such as HES are expected to and wish to play a key role in supporting, leading and delivering elements of the place-based approaches set out in NPF4. But like many across the public sector, we are currently experiencing serious resourcing challenges.

Partnership working

The [Key Agencies Group](#) is currently developing and delivering a new [cross-agency approach to placemaking](#). This can help to support the delivery of complex or largescale developments and can help to build in environmental solutions and placemaking principles from the outset. Greater collaboration and partnership working approaches such as this will be required to deliver the NPF4 outcomes. We recommend such approaches form a fundamental part of any delivery strategy.

56. Annex A. Do you agree that the development measures identified will contribute to each of the outcomes identified in section 3A(3)(c) of the Town and Country Planning (Scotland) Act 1997?

Yes.

58. Do you agree with the definitions set out above? Are there any other terms it would be useful to include in the glossary?

Yes. It would be helpful to include the definition of infrastructure as set out in the [Infrastructure Investment Plan](#):

The physical and technical facilities, natural and other fundamental systems necessary for the economy to function and to enable, sustain or enhance societal living conditions. These include the networks, connections and storage relating to the enabling infrastructure of transport, energy, water, telecoms, digital and internet, to permit the ready movement of people, goods and services. They include the built environment of housing; public infrastructure such as education, health, justice and cultural facilities; safety enhancement such as waste management or flood prevention; natural assets and networks that supply ecosystem services and public services such as emergency services and resilience.

59. Environmental Report. What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

The majority of our historic environment assets are undesignated. The Environmental Report notes this.

This makes it important that the assessment of policies and proposals explore the interactions with this baseline. This has to cover both positive and negative impacts, including where this resource can play a role in the delivery of the aims and aspirations of the framework. Where site-specific proposals have been assessed that the report uses a more detailed baseline. We welcome this approach.

Overall, we are satisfied that an appropriate baseline has been utilised for the assessment.

Key trends

The identification of key trends and pressures affecting the baseline is very helpful. The report correctly points to several pressures and challenges that the historic environment faces from issues such as climate change and new development.

This section could also have recognised a number of positive interactions between the historic environment and other policy areas.

The historic environment is a resource to be maintained and reused in line with the [Infrastructure Investment Plan](#) Hierarchy of Development. Historic structures contain embodied energy, and circular economy principles can be delivered from traditional building materials and practices. Historic places and spaces make a crucial contribution to our daily lives and well-being.

Historic environment data for Action Areas

NPF4 presents evidence and data insights for the five proposed Action Areas. The data insights help to identify what makes each area unique, and outline key challenges and opportunities.

For the historic environment, the only information presented is the number of scheduled monuments per 1,000 people. This is not an appropriate measure of the contribution of these assets.

More importantly, scheduled monuments are just one aspect of Scotland's rich historic environment. We do not understand why the data insights do not include any other historic environment assets and places, such as listed buildings or conservation areas. No justification for this is presented in the text.

This element of data and evidencing has not fully appreciated the historic environment resources in these areas. This may have led to a lack of recognition of the contribution it can make to the delivery of the spatial strategy. It is also not clear whether the scheduled monument data that is given has informed or influenced the development of these Action Areas.

Historic Environment Policy for Scotland

Section 3.7.2 discusses the policy context and refers to the "Historic Environment Scotland (HES) Policy". This document should be referred to as the [Historic Environment Policy for Scotland](#), or HEPS. HEPS sets out the policies and principles that should be considered when making decisions that affect the historic environment. This includes the management of historic environment assets as well as ensuring the historic environment is considered in plan and strategy preparation.

60. Environmental Report. What are your views on the predicted environmental effects of the draft NPF4 as set out in the environmental report? Please give details of any additional relevant sources.

1. Central Scotland Green Network

We welcome potential positive impacts on heritage assets within our remit through improved access. Opportunities to maximise landscape benefits should also tie in with local heritage and larger designations such as Gardens and Designed Landscapes (GDLs) and Battlefields.

2. National Walking, Cycling and Wheeling Network

We welcome the identification of potential positive impacts on heritage assets through improved access. We note that further consideration will be given to the potential for impacts on the historic environment at the project stage.

3. Urban Mass/Rapid Transit Networks

These proposals have the potential for both positive and negative effects on the historic environment, and the assessment identifies this. The precise nature, scale and location of proposals are unclear at this point, so we welcome the recognition of the importance of the detailed consideration impacts on the historic environment at the project stage.

4. Urban Sustainable, Blue and Green Drainage Solutions

The assessment identifies potential negative effects on heritage assets from proposals under this national development. This includes assets within our remit and their settings, such as the Antonine Wall World Heritage Site. Any impacts on the historic environment should be considered at the project stage. Mitigation should be laid out and enhancement opportunities highlighted. Any opportunities to enhance and promote access to the historic environment should be maximised.

While negative effects have been predicted there is also the potential for positive effects. Innovative water management in placemaking can use historic environment assets as part of drainage solutions. A good example of this is the Glasgow Smart Canal project.

5. Circular Economy Materials Management Facilities

The assessment predicts negative effects on the setting of historic environment assets from these facilities. We agree with this finding, but also note potential positive effects. Greater material availability for traditional buildings may help with their maintenance and repair.

Construction and demolition industries are given prominence within the proposals. As we have noted in our earlier response to this proposed national development, current Local Development Plan policies such as Aberdeen City Council's Our Granite Heritage Policy recognise the sustainable practice and desirability of reusing traditional building materials, in this case granite. Reuse of materials in replacement

schemes for buildings and features can be positive in terms of the character and appearance of our places and spaces.

This national development may have a positive role to play in the availability of materials. This is important in the context of an increased focus on the reuse and maintenance of our existing assets. Plans such as the [Infrastructure Investment Plan](#) clearly emphasise this approach.

6. Digital Fibre Network

We agree that the proposals may give rise to negative effects on heritage assets within our remit and their settings. In general terms such proposals have the potential for significant negative effects on the site and setting of known and unknown terrestrial and marine historic environment assets. We welcome the recognition that further consideration of impacts on the historic environment will be required at the project stage.

7. Islands Hub for Net Zero

The assessment for the Islands Hub for Net zero recognises the potential for significant negative effects on the site and setting of known and unknown terrestrial and marine historic environment assets. Historic Environment Scotland supports the principle of the right development in the right place.

As noted in [The National Islands Plan](#), 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 spatial strategy in the North and West Coastal Innovation action area highlighted this, emphasising how our islands make a significant contribution to our tourism industry and the need to target investment in infrastructure. But this resource has many other values beyond its contribution to tourism.

Islands also have a relatively limited amount of available land for development. This makes taking a place-based and plan-led approach to the delivery of this national development even more important. Project level assessment will still be important, but Scotland's islands have a unique character which should be taken into account in planning for large-scale developments in these areas.

Taking a plan-led approach to this National Development will help to provide more certainty for communities, developers, decision-makers and consultees including Historic Environment Scotland. It will also ensure that the delivery of this National Development is in line with Policy 1 – a plan-led approach to sustainable development.

This should also be supported by a requirement for collaborative working. Working in this way will ensure that the full range of benefits to development can be achieved by making sure that an inclusive understanding of planned development is achieved.

8. Industrial Green Transition Zones

The delivery of infrastructure to support this proposal has the potential for significant effects on the site and setting of both terrestrial and marine historic environment assets. The assessment identifies this potential adverse effect. The reuse of existing infrastructure also has the potential for positive effects where assets of historic significance can be reused and maintained, particularly designated industrial heritage.

9. Pumped Hydro Storage

We agree that these proposals may give rise to significant negative effects on heritage assets and their settings. We welcome the consideration given to specific assets and asset types.

[Ben Cruachan Hydro Electric](#) is a category A listed building. The potential effects identified show that it will be important to consider this in detail at project stage. Project proposals should put forward appropriate mitigation for identified effects. Potential opportunities for the reuse and maintenance of existing assets, as well as the enhancement and promotion of access to the historic environment should also be explored and maximised.

10. Hunterston Strategic Asset

We note that these proposals are considered to have the potential to give rise to negative effects on marine and terrestrial heritage assets and their settings.

The assessment specifically addresses impacts on [Kelburn Castle](#) as a category A listed building with an associated [Inventory Designed Landscape](#). There are a number of other nationally important heritage assets that may be affected. This includes some scheduled monuments, and also the category A listed building [Hunterston Castle](#) and its associated designed landscape. Some of these assets are closer to the Hunterston sites than Kelburn Castle.

Project level proposals will need to give detailed consideration to such impacts and identify of mitigation to minimise identified. We welcome the fact that this assessment recognises this.

12. Strategic Renewable Electricity Generation and Transmission Infrastructure

The delivery of projects to support this proposal has the potential for significant environmental effects. This includes effects on the site and setting of both terrestrial and marine historic environment assets. The proposals under this national development cover renewable energy developments and transmission infrastructure of substantial scale.

A plan-led approach should be taken to the delivery of this development. A plan-led approach will give more certainty for communities, developers, decision-makers and consultees – including Historic Environment Scotland. It will also ensure that the

delivery of this National Development is in line with [Policy 1 – a plan-led approach to sustainable development](#).

Taking this approach would not change the fact that site specific assessments and consenting processes are critical to sustainable outcomes.

This National Development should be supported by a requirement for collaborative working. This will ensure that an inclusive understanding of planned development is achieved and that the full range of benefits of the development can be achieved.

13. High Speed Rail

Proposals associated with this national development have the potential to give rise to negative effects on both the site and setting of historic environment assets. There may be effects on the historic environment from electrification where historic structures cross existing lines. Upgrading historic station buildings could impact on their cultural significance. New buildings and structures could also affect the historic environment.

The reuse of existing infrastructure has the potential for positive effects where assets of historic significance can be reused and maintained.

14. Clyde Mission

We welcome the recognition of the potential for the Clyde Mission to impact on the historic environment. We agree with the finding of potential effects on the site and setting of both terrestrial and marine historic environment assets. Would expect appropriate mitigation and, where appropriate, enhancement to be developed in relation to this at project level.

We agree that there will also be the potential for positive effects through reuse of historic environment assets and the improvement of settings. This national development also recognises the key role that the historic environment can play in successful placemaking. There is potential for positive effects through:

- promotion of proactive care
- maintenance and climate change adaptation of historic environment assets
- increased understanding of and sustainable access to historic environment assets

These potential positive effects are most likely to be realised effectively through integration of enhancement measures at a high level, as well as at the project level.

15. Aberdeen Harbour

Development of the North Harbour has the potential to impact on the setting of listed buildings within the harbour complex. Changes in the harbour area, including any potential for dock infill to provide further developable land, could have wide impacts. This could include the marine and terrestrial historic environment assets and alter

the existing character of the surrounding area, including adjacent conservation areas.

The assessment recognises that proposals at both the North and South harbour have the potential to impact on historic environment assets and the character of the surrounding area. Some of these assets are within the development areas. The new South Harbour and the associated development associated with the proposed energy transition zone will impact on the setting of some scheduled monuments including [St Fittick's Church](#) and [Crab's Cairn](#).

The consideration of these impacts should inform project development. Proposals should put forward mitigation to address negative impacts. They should also ensure the continued use of historic assets within the proposed development and recognise the role that our historic environment can play in placemaking.

16. Dundee Waterfront

We agree that there is potential for development across the zones included under the Dundee Waterfront national development to impact on the historic environment. Historic environment assets are present across these zones, with a focus around the port and docks. All zones have the potential to impact on the site and setting of historic environment assets with the port area particularly sensitive. The port area also contains much infrastructure of historic environment interest which presents the opportunity for positive reuse.

We agree with the finding of potential adverse effects on the site and setting of both terrestrial and marine historic environment assets. We expect appropriate mitigation to be developed in relation to this at the project level.

The assessment predicts positive effects from the reuse of existing buildings and infrastructure under the Material Assets topic. This is also a potential positive effect on the historic environment. This positive effect relates not just to the sustainable use of our existing historic environment resources but also the key role that these assets play in placemaking.

17. Edinburgh Waterfront

We agree that there is potential for negative effects on the site and setting of historic environment assets. We expect this to be mitigated at project level. We agree that there is the potential for positive effects through the recognition of the key role that the historic environment can play in successful placemaking. There is also potential for positive effects through the retention, reuse and appropriate climate adaptation of historic environment assets.

18. Stranraer Gateway

The proposals brought forward as part of the Stranraer Gateway project are likely to have positive and negative effects on the historic environment. The assessment recognises this.

We therefore expect that at project stage proposals consider options for mitigating any adverse effects on heritage assets and their settings. Proposals should also ensure that any positive effects on the historic environment are maximised. This will include proposals for the re-use and enhancement of Stranraer's historic buildings and features. Stranraer's historic environment is a key placemaking asset and all project proposals should recognise this.

There is also potential for positive effects through the retention, reuse and appropriate climate adaptation of historic environment assets.

[Assessment of NPF4 national policy handbook](#)

We welcome the systematic and clear assessment of the draft planning policies in part 3 of the NPF4, as reported in Appendix C. We agree with most of the conclusions for likely effects on the historic environment, and for how the historic environment can positively contribute to the policies for Sustainable, Liveable, Productive and Distinctive Places.

Making best use of existing infrastructure is likely to have positive impacts for the historic environment. Some infrastructure is an important heritage asset in its own right. We welcome the fact that the assessment recognises this.

We have suggested various changes to the policy handbook. If these and other amendments are taken forward, this would affect some of the findings. It will be important to take this into account in finalising the framework.

For example, for the policies on minerals (page C-57) we agree that the potential for negative effects would be mitigated by the provisions in Policy 22 and Policy 28. But there would be more positive effects policy 22 also had a new provision to support the sustainable extraction of Scottish building stone.

This is due to the positive role this would play in supporting the restoration, re-used an adaptation of historic buildings and infrastructure. There may also be positive effects for climatic factors for reduced global Green House Gas (GHG) emissions due to reduced long distance transportation requirements. Our detailed advice on this is in our response to [question 43](#).

[62. Environmental Report. What are your views on the assessment of alternatives as set out in the environmental report?](#)

We welcome the assessment of these alternative national developments. We generally agree with the findings presented. The varying degrees of detail available on how proposals would be taken forward leads to the assessment being carried out at a high level. This assumes that lower-level assessment will consider the environmental impact of proposals in further detail. We agree with this approach.

We have the following comments on the individual assessment findings.

Longannet

The assessment notes that there are a number of historic environment assets in the surrounding area of the site of the former Longannet Power Station. This includes:

- [Tulliallan inventory garden and designed landscape](#)
- [Blair Castle](#) category A listed building
- [Blair Castle inventory garden and designed landscape](#)
- [Dunimarle Castle inventory garden and designed landscape](#)
- [Dunimarle Castle](#) category A listed building

We agree with the findings presented in the summary assessment here in relation to the historic environment.

National Centre for Community Heat

Any environmental assessment undertaken at the project stage consider impacts on heritage assets and their settings. This should include impacts from infrastructure requirements. Proposals should and bring forward mitigation where appropriate.

Ravensraig

No significant impacts on the historic environment have been identified in relation to this proposal. However, the historic environment has a role that to play in placemaking, including providing the context for development and the potential for the reuse of existing assets. This can contribute to development that connects place and historic land use.

Climate Evolution Zone including: Blindwells – Cockenzie – Energy Transition Zone – mixed development

We welcome that the assessment findings have recognised the need to consider the implications of these proposals. This includes impacts on the site and setting of assets as well as the positive contribution they can make to placemaking.

Developments in this area also have the potential to impact on the Inventory of Historic Battlefields site of the Battle of Prestonpans, and this is not mentioned. We continue to engage with all stakeholders as these proposals emerge. We expect this assessment to recognise that project level assessments need to address this issue.

Ardeer Peninsula

There is no reference in the assessment summary to the potential for effects on the historic environment caused by the redevelopment of the ICI complex at Ardeer. The Category B listed [South African Pavilion](#) is in this area. There are also a number of disused structures and features within the ICI complex. These may also be of heritage value and may offer the opportunity for positive reuse.

There therefore is a potential for positive effects on the historic environment as a result of the re-use and enhancement of the historic buildings and structures. The historic buildings and features located within the ICI complex could play a role as key placemaking assets. Proposals will also need to consider potential negative effects on heritage assets and their settings.

Vacant and Derelict Land re-development

We note that no effects on the historic environment have been identified in the summary assessment. Addressing vacant and derelict land has a strong connection to our historic environment resources. There is therefore the potential for positive effects on historic environment as a result of the re-use and enhancement of the historic places, buildings and structures through redevelopment. Historic buildings and features located within brownfield sites also have the potential to form key placemaking assets.

Renewable energy generation

No effects have been identified here for the historic environment. Project level assessment should consider the potential impacts on assets in the vicinity of proposals. This is likely to include the scheduled monuments of [Dounreay Castle](#), [Knock Urray Broch](#) and [Cnoc-na-h'Uiseig, chambered cairn](#).

Edinburgh, East Lothian and Midlothian Innovation Zone

No effects on the historic environment have been reported in the assessment summary. The scale of proposals here will likely lead to both positive and negative effects on the historic environment. Positive outcomes may arise from the reuse of existing buildings and infrastructure of historic interest and the contribution of our historic places and spaces to placemaking. Negative impacts are more likely to be on the site and setting of historic environment assets. We expect lower-level plan and project level development to consider these issues and mitigate negative effects and enhance the historic environment where possible.

West Edinburgh

Numerous historic environment assets are situated within the spatial scope of the West Edinburgh Development. However, is no reference to this in the summary of assessment findings. There is potential for negative effects on the site and setting of historic environment assets. This should be mitigated through the Local Development Plan's Place Policies and spatially specific development requirements as well as project development. There is also potential for positive effects through the role of the historic environment in successful placemaking.

Zero Carbon Innovation Zones

There is a potential for positive effects on historic environment caused by the reuse and enhancement of the historic buildings and structures through redevelopment. Historic buildings and features located within brownfield sites have the potential to form key placemaking assets. Project level assessment should also consider potential for negative effects on the site and setting of historic environment assets. We note that where impacts on designated assets are unavoidable through the reuse of vacant and derelict land additional consents such as listed building consent or scheduled monument consent may be required.

Lochaber Smelter

This proposal lies within the boundary of two inventory battlefields – [Inverlochy I](#) and [Inverlochy II](#). However, there is no reference to these nationally important heritage assets in the summary of assessment findings.

We have responded to a related planning application for this proposal under Highland Council Planning reference 21/02413/FUL. Our letter of 23 July 2021 stated we were content that proposal was unlikely to have a significant impact on physical remains associated with the battlefields. This was based on results of a 2018 Metal Detector Survey. Further development beyond the parameters of the 2021 application may have the potential for effects on these historic environment assets.

Space Industry and Space Ports

The summary assessment findings do not include any identified effects on the historic environment. The assessment notes assumptions have been made relating to the scale of infrastructure required.

We have been consulted on some of the developments under this proposal and are aware that significant impacts have been identified in relation to historic environment assets, including scheduled monuments. It is important that potential impacts on historic environment assets are considered at an early stage of project development. We expect this assessment to highlight issue for project level development, in relation to both location and design of proposals.

Freeport on the Clyde

There is potential for positive effects through the role of the historic environment in successful placemaking. There is also potential for negative effects on the site and setting of historic environment assets. This should be mitigated at the project design stage through the Local Development Plan's Place Policies and spatially specific development requirements.

National inter-city Network

Works such as electrification can have implications for historic environment assets such as bridges and station infrastructure. Assessment should consider these impacts. Any mitigation undertaken at the project stage should aim to minimise adverse impacts on heritage assets and their settings. The reuse of existing listed rail infrastructure has the potential for positive effects where assets of historic significance can be reused and maintained.

National Rail Freight Terminal, Mossend and Eurocentral

Implications for the historic environment are noted in the assessment as a result of infrastructure improvements or development. Project proposals should consider these impacts and design mitigation to minimise adverse effects on heritage assets and their settings. They should also aim to enhance any beneficial impacts.

National Low-Carbon Freight Network

The reuse of existing listed rail infrastructure has the potential for positive effects where assets of historic significance can be reused and maintained. As the assessment notes, works associated with these proposals can have implications for historic environment assets. Works might affect bridges and station infrastructure as well as archaeological remains if there are interventions such as extended land take for overtaking loops and new direct access routes. Assessment should consider these impacts. Any mitigation undertaken at the project stage should aim to minimise adverse impacts on heritage assets and their settings.

A National City Centre Transformation Programme for Scotland

We welcome the recognition of the key contribution of historic environment assets to the character of places and their role in informing and influencing good placemaking. The general locations listed include a large number of designated assets which help define these significant city areas. Proposals should therefore consider both the positive and negative effects that may arise from proposals and emphasise the importance of the continued use and maintenance of our existing assets.

Edinburgh Orbital Bus Project

The parameters of the proposals are unclear at this stage. However, the maintenance and reuse of existing listed road infrastructure such as bridges has the potential for positive effects where assets of historic significance can be reused and maintained.

North East Transport Investment

We note the summary assessment here in relation to the historic environment. We are generally content to agree with the findings presented. We welcome the recording of the assumptions and uncertainties underlying the assessment findings.

The potential effects on the historic environment are likely to include negative effects on the site and setting of historic assets and places from the introduction of new transport infrastructure. There will also be effects on existing historic infrastructure such as stations, bridges and access structures. Positive effects are also likely where such historic environment assets can be supported, maintained and reused.

Trunk and Strategic Road Improvements (Various)

We note the summary assessment here in relation to the historic environment. We are generally content to agree with the findings presented. There are potential negative effects for the historic environment in relation to the impact of new infrastructure on the site and setting of assets. While the commentary on building on existing infrastructure is noted we are aware that a number of the proposals named include substantial new infrastructure beyond existing transport corridors (for example, the A96 Dualling Programme).

Development on community-owned land

Potential effects on the historic environment will be dependent on individual locations. Project level proposals should consider potential negative effects on the site and setting of historic environment assets. They should also identify potential positive effects through the reuse of existing assets and recognise the key role such assets can play in supporting a place-based approach to development.

National Tartan Centre

We note the summary assessment here in relation to the historic environment. We are content to agree with the findings presented. We also note the additional potential for positive effects through recognition of the key role of the historic environment in successful placemaking.

Clyde Tidal Barrier

Assessment undertaken at the project stage for the tidal barrier should aim to minimise identified impacts on heritage assets and their settings.

10,000 Raingardens for Scotland

Any assessment undertaken at the project stage for the developments should aim to minimising identified impacts on heritage assets and their settings.

Opportunity Cromarty Firth

As the assessment notes, the delivery of infrastructure to support this proposal has the potential for significant effects on the site and setting of both terrestrial and marine historic environment assets. The reuse of existing infrastructure also has the potential for positive effects where assets of historic significance can be reused and maintained.

National Green & Blue Infrastructure Network

Elements of our existing green and blue infrastructure have both natural and cultural qualities. For example, gardens and designed landscapes provide important areas of habitat and recreation and are of historic significance. Our canal network also plays a significant role in providing active travel opportunities.

As the assessment recognises under Population and Human Health that the canal network also provides for creative solutions to surface water management. This is shown in the Glasgow Smart Canal project.

The assessment findings summary identifies negative effects for the historic environment through planting and infrastructure requirements. However, positive effects have been noted for landscapes from the support for high quality environment spaces at local and national scale. Similar benefits for the historic environment can be identified here through the protection and promotion of places such as GDLs and Battlefields which play an important role in habitat and landscape provision and protection as well as their cultural significance.

Scottish Nature Network

The assessment findings summary does not identify any effects for the historic environment. However, positive effects have been noted for local landscapes. Similar benefits for the historic environment can be identified here through the protection and promotion of places such as GDLs and Battlefields which play an important role in habitat and landscape provision and protection as well as their cultural significance.

Glasgow National City Park

Places and spaces such as parks, gardens, squares and waterways provide the context for historic environment assets as well as often being of cultural significance in themselves. These proposals are likely to have mainly positive effects on the historic environment through maintaining and enhancing such assets and the amenities they provide.

Sea Ports

There is the potential for a mixture of positive and negative effects on the site and setting of historic environment assets arising from these proposals. The maintenance, repair and reuse of existing port infrastructure as well as investment in historic ports has the potential for positive effects. However, if future use proposals require significant changes to port infrastructure this may lead to negative effects on the site and setting of historic environment assets. Project proposals should consider these impacts and aim to mitigate adverse effects and bring forward enhancement where possible.

Strategic Ports and Roads

The reuse of existing transport infrastructure has the potential for positive effects where assets of historic significance can be reused and maintained. Any assessment undertaken at the project stage for the developments should aim to minimise impacts on heritage assets and their settings.

63. Environmental Report. What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

We generally agree with the proposals for mitigation, enhancement and monitoring put forward in the environmental report. This is a high-level assessment of national developments and their alternatives and so much of the detailed consideration of these issues is highlighted for assessment at the project level.

Our comments on the national developments and their alternatives point to where we have identified potentially significant interactions that are not mentioned in the assessment. Our aim is to raising awareness of these issues to inform lower-level assessment. We hope our comments on the national developments are helpful and that they inform the mitigation set out in Section 7.1 – National Developments – Proposed Mitigation.

As a general point, many of the individual assessment findings focus on the adverse effects of development on our historic environment. Development has the potential to impact on the site and setting of designated historic environment assets. But we encourage a wider consideration of the positive connections our historic environment resources have with the aspirations that underlie many of the national developments.

These connections have the potential to realise mutually positive effects against both the delivery of proposals and the environmental objectives for the historic environment. We particularly welcome the generic mitigation reported in Section 7.2 that recognises three key areas of action:

- assess the impacts to historic environment assets at plan and project level
- seek opportunities to maintain, restore and repurpose historic assets to support sustainable placemaking
- support high quality design to contributes positively to the character and sense of place of the area

Partial Business and Regulatory Impact Assessment (BRIA) – Questionnaire

Name of Organisation	Historic Environment Scotland
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QUESTIONS

Sectorial information

Is there information available, or that you can provide, on the contribution that the sector in which you operate makes to the Scottish economy (production, employments, exports, GDP, etc.).

Specific proposals

Are there any changes proposed in the Draft NPF4 and the Local Development Planning Regulations and Guidance that you think will impose additional, or reduce existing, costs on your business or organisation?

Please also consider cumulative impacts if you consider relevant.

National Planning Framework 4:

Policy 28: Historic Assets

The general requirement for heritage assessments in support of applications which could significantly impact on historic assets, while beneficial in some circumstances, could result in increased costs for developers (consultancy fees etc.) and may mean that we/planning authorities will spend more time/resource reviewing these outputs. We would query whether these would bring significant value to the process when existing assessment already exist, such as design and access statements and comprehensive reporting that is required for EIA developments.

Our 'Managing Change in the historic environment guidance notes' are identified as key document supporting the development of proposals affecting the historic environment and we welcome this. However, some of the changes introduced by NPF4 potentially creates an additional imperative for us to update, maintain and create new guidance notes to support decision-making. We anticipate this will have resourcing and cost implications beyond our current baseline for the maintenance of these guidance notes. We would anticipate that other key agencies will similarly be expected to update their national level guidance in light of other changes throughout NPF4.

National Developments

There is also an enduring requirement for us to engage in the consenting processes for national developments by providing information and advice as

part of the Environmental Impact Assessment process. The impact on our service generated by the new onshore wind policy statement which sets an ambition to deliver and additional 8 –12 GW of onshore wind, twinned with the NPF4 Green Energy Policy, will require us to engage with an increased volume of EIA Reports and help determine the acceptability of proposals.

Policy for the re-use of existing buildings:

This is a really positive policy agenda for our interests, but will require HES to engage more intensively with applicants and authorities on the re-use of our most significant places. We'll need to help propose solutions and highlight best practice in this regard.

Local Development Plans:

We expect the change introduced by the Planning (Scotland) Act 2019 to make NPF4 part of the statutory development plan and to move to a 10-year plan-making cycle to have significant benefits and savings for planning authorities, key agencies and other stakeholders. This is because it should reduce the time spent on the plan-making phases overall and, will reduce the time spent translating the national policy expectations from Scottish Planning Policy at the local level. This should allow for a greater focus and more time to collaborate on the spatial strategy.

Overall, we believe that the policies contained within the national planning policy handbook provide a helpful framework which can be applied across Scotland (subject to the revisions that will inevitably need to take place to clarify certain policies in response to this consultation exercise and Parliamentary scrutiny). We anticipate that instances for local level policies to depart from NPF4 will be rare. However, there does remain potential for additional policies to be included within Local Development Plans and there may be some instances where this would strengthen their application, which we support. We have given the example where more tailored or site-specific policy approaches could be included within LDPs for historic battlefields or world heritage sites and there may be other areas where a similar approach would be helpful. We therefore anticipate that the national policy handbook may not entirely remove the need for further debate around policies at the local level.

Costs

Please provide details of all likely costs (additional and savings) associated with the proposals identified above including, where applicable, non-monetary costs.

National Planning Framework 4:

The costs identified above are expected to have additional resourcing/staffing costs which are difficult to quantify.

Local Development Plans:

The costs identified above are expected to have general resourcing/staffing costs which are difficult to quantify.

Benefits

What are the benefits associated with the proposals identified above?

National Planning Framework 4:

The updated NPF4, having been informed by extensive stakeholder engagement, should help to provide greater clarity and assurance for planning decisions.

Local Development Plans:

The new LDP system provides opportunities to take a fresh approach to spatial planning and the need to no longer replicate national planning policy at the local level is expected to reduce duplication and release more capacity to focus on place-based responses.

Impacts on competition

Are there any proposals that you think will have an impact on competition within the sector that you operate? This might include proposals that will directly or indirectly limit the number or range of suppliers or their ability to compete?

If yes, please provide further details:

National Planning Framework 4:

No comments.

Local Development Plan's:

No comments.

Impacts on consumers

Will the proposals limit or improve the choices available to consumers? This might include the quality, availability or price of any goods or services in a market or the provision of essential services, such as energy or water?

If yes, please provide further details:

National Planning Framework 4:

No comments.

Local Development Plan's:

No comments.

Other Comments

National Planning Framework 4:

No comments.

Local Development Plan's:

No comments.

Thank you for your comments. Would you be happy for the Scottish Government to contact you again to discuss your comments further?

If yes, please provide the following contact details:

Name	e-mail address
Ann MacSween	ann.macsween@hes.scot