



PLANNING PERFORMANCE FRAMEWORK REPORT 2022-2023



HISTORIC
ENVIRONMENT
SCOTLAND

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INTRODUCTION

This Report details the planning performance of Historic Environment Scotland (HES) from 1 April 2022 to 31 March 2023. It sets out our role in the planning system and gives an update on our ongoing work to secure positive outcomes for the historic environment.

We have prepared the report in line with the requirements of the 'Key Agencies Group Model' for the Planning Performance Framework Review Reports. Using this model, the report demonstrates how we have performed against the agreed Performance Markers for 2022-23, and describes our contribution to the planning system under the following themes:

- Placemaking
- Capacity building
- Service
- Service improvements

The report gives both quantitative and qualitative evidence of our performance, and highlights aspects of our work through highlights. Key areas of our work include:

- providing advice within the planning system
- regulating works on scheduled monuments
- supporting the development of national plans, policies, programmes and strategies
- designating new sites and places, and reviewing existing designations
- producing historic environment policy and guidance
- monitoring activities related to our work
- actively engaging with and training stakeholders, owners and communities
- providing advice via Design Review Panels and grant aid applications
- supporting works for the conservation and management of historic assets and places

This reporting year included significant work undertaking workforce planning in our Planning, Consents and Advice Service. We are responding to major increases in renewables applications and associated infrastructure and are reviewing our service to ensure that we are adequately resourced to deal with the number of cases coming through for our advice as a statutory consultee.

Even with these challenges, we have pushed forward with our programme of business improvement, making our procedures more transparent and easier to understand. We have continued to exceed our planning and consents corporate target of dealing with 90% of regulatory activities, consultations and decisions within the expected timescales.

ABOUT HISTORIC ENVIRONMENT SCOTLAND

We are the lead public body established to investigate, care for, and promote Scotland's Historic Environment.

- We care for more than 300 sites of national importance across the country and are the largest operator of paid visitor attractions in Scotland
- We look after internationally significant archives and artefacts
- We are at the forefront of investigating and researching the historic environment and addressing the impacts of climate change on its future
- We manage change to our most significant heritage assets while providing the protection they need, ensuring this resource is available for generations to come. We do this by giving advice on strategic plans and policies, development proposals affecting the historic environment, administering consents for scheduled monuments, and designating historic assets and places
- We support the conservation and sensitive reuse of Scotland's historic environment by providing advice and expertise and offer a wide range of training and learning opportunities
- We provide millions of pounds each year to local communities to repair and revitalise their historic environment
- In every aspect of our work, we strive to follow our five organisational values – we are collaborative, professional, innovative, open, and respectful

We want the historic environment to make a real difference to people's lives. A difference to our health, to our economy, to our culture, to our environment. We want heritage to involve everyone so that we all benefit. Our Corporate Plan, [Heritage for All](#), sets out our vision and priorities.

WHAT WE DO IN THE PLANNING SYSTEM

The Heritage Directorate leads our work in the planning system, coordinating a wide range of relevant skills, knowledge and expertise from across HES. This Report focuses on the work of our Planning, Consents and Advice Service, Designations Service, and Heritage Information and Business Service. Our aim is to promote consideration of the historic environment at all stages of the planning process. We try to inform and enable good decision-making, so that the historic environment of Scotland is valued and protected.

Our Designations Service compiles and maintains lists of nationally important historic buildings, archaeological sites and monuments, gardens and designed landscapes and historic battlefields. They also advise Scottish Ministers on the designation of historic marine protected areas.

Our Planning, Consents and Advice Service (PCAS) provides advice on the potential impacts of development on the historic environment, advice which is often linked to our statutory functions relating to planning and consenting processes and includes listed building consent and conservation area consent, and our role as regulator for scheduled monument consent. We are a consultation body for developments requiring an Environmental Impact Assessment. PCAS also leads on strategic planning matters and supports the development and implementation of heritage management policy and guidance and provides advice on the development of planning policy and strategies. The team also engages with strategic stakeholders and communities on the management of the historic environment. This includes supporting regional and local development plan preparation and acting as a Consultation Authority for Strategic Environmental Assessment.

Our Heritage Information and Business Service co-ordinates our planning and consenting processes, liaising with applicants and decision-making bodies to ensure we are consistent and timely. They also create and manage data, photographs, drawings, and maps and make a range of information available to the public through our online resources.

Further information on all these services can be found in [Our Regulatory Framework](#).

HIGHLIGHT 1: OUR REGULATORY FRAMEWORK

Throughout the year we have been developing [Our Regulatory Framework](#). We consulted stakeholders and the public on this in late 2022 and it is now published. It is for anyone who engages with our services or wants to understand more about the decisions we take and the advice we give.

The Framework identifies and describes the work we do in designation, building survey, environmental assessment, the planning system, World Heritage, dangerous buildings, and the management of scheduled monuments. It is a high-level overview, with links to the laws and policies that guide how we deliver these services.

The framework describes the principles and goals that underpin our work and how we are responding to challenges facing Scotland, including the climate emergency and ecological crisis.

Our principles:

- **Transparent**
- **Accountable**
- **Consistent**
- **Proportionate**
- **Targeted**

Our goals:

- **Valuing our heritage**
- **Looking after our heritage**
- **Improving equality**
- **Building a better future**
- **Responding to our changing climate**
- **Restoring biodiversity**
- **Empowering communities**

We are committed to using our regulatory and advisory roles to take positive action. The framework sets out our role in supporting decision-makers to understand the impacts of change and deliver a range of objectives for the historic environment. We have also identified a range of ways to measure our performance and impact, including this report.

One of our objectives is to ensure that decisions about key aspects of our lives consider the effect on historic sites and places, and to show how this can deliver multiple benefits for society. There are important lessons we can learn from the past as we look to the future. We will contribute to Scotland's Green Recovery and support the planning principle of 'the right development in the right place', ensuring we make the most of our existing buildings and infrastructure.

Our Regulatory Framework helps people understand what we do and why we do it.

In the following highlights, we'll show how they've contributed to meeting the principles and goals in Our Regulatory Framework.



OUR PEOPLE

Our three teams include specialists with knowledge of architecture, conservation, archaeology, planning, policy, environmental assessment, and data. We employ 94 members of staff within these teams who all provide or contribute to a range of planning-related services. The uplift in staff numbers compared to our previous report (77) is primarily related to structural reorganisation that led to data colleagues moving to Heritage Information and Business.

OUR DECISION-MAKING

Decision-making processes are standardised across our teams. They are underpinned by a set of sign-off and quality control procedures. [Our schedule of governance for decision-making for designations and casework](#) is published on our website and there is more information in [Our Regulatory Framework](#).

TABLE 1: OUR PEOPLE

Service Name	Job Role	Number of Staff
Planning Consents and Advice Service	Head of Service	1
	Deputy Head of Service	7
	Senior Officer	27
	Officer	7
	Field Officer	6
	Casework Support Officer	2
	Service Total	50
Designations Service	Head of Service	1
	Deputy Head of Service	3
	Senior Officer	6
	Officer	8
	Service Support Manager	1
	Service Support Officer	3
	Service Support Assistant	1
Service Total	23	
Heritage Information and Business Service	Head of Service	1
	Deputy Head of Service	1
	Data Manager	4
	Data Officer	3
	Business Manager	2
	Casework Technician	4
	Business Support Assistant	6
Service Total	21	
Combined Staff Total		94

PERFORMANCE MARKERS

This report uses narrative, statistics, and highlights to demonstrate how we achieve positive outcomes in the historic environment against agreed performance markers. These are grouped under three broad headings: Placemaking, Capacity Building and Service.

PLACEMAKING

A. STRATEGIC PLANNING

By participating in national and strategic plan-making we work with other stakeholders to achieve positive outcomes. Through these conversations, we help protect and conserve the historic environment for the enjoyment, enrichment, and benefit of everyone.

We provide advice and information to support the development and delivery of a broad range of national plans, policies, and strategies. We have, for example, continued to advocate for recognition of our historic environment and the important role played by farmers, crofters and other land managers in caring for historic assets and places across Scotland in the emerging new Agriculture (Scotland) Bill. We emphasised that the historic environment provides significant carbon sinks, and biodiversity refuges, as well as defining local identities and providing resources for sustainable tourism. Financial and other support to farmers, crofters & land managers for managing this resource helps to strengthen and diversify rural economies.

PLANNING REFORM

In the reporting year we continued to work on the [Implementation Programme](#) for the Planning (Scotland) Act 2019 offering advice and evidence to Scottish Government and others as reforms to the planning system, through Scotland's Fourth [National Planning Framework \(NPF4\)](#), are introduced. We also contributed to planning system reform and associated legislation through our involvement in the [Key Agencies Group](#).

INFLUENCING NATIONAL PLANS AND POLICIES: SUMMARY OF NATIONAL PLANS, POLICIES, AND STRATEGIES WHERE WE PROVIDED ADVICE THIS YEAR

During the past year we continued to provide advice on draft proposals for changes to Permitted Development Rights (PDR). Our advice will inform the second phase of the PDR review programme, which will focus upon town centre changes of use, electric vehicle charging infrastructure and port developments. In the coming year we will continue to work with Scottish Government and other stakeholders on the [Programme for Reviewing and Extending Permitted Development Rights \(PDR\) in Scotland](#).

Our advice on national level plans, policies and strategies included:

- giving advice on the [Heat Networks Delivery Plan](#),
- the [UK Forestry Standard](#),
- calls for evidence for Net Zero and [Just Transition](#) delivery plans,
- the [emerging Agriculture Bill for Scotland](#),
- the [future for national parks in Scotland](#),
- changes to building regulations for [heating standards](#),
- and the [waste target route map](#).

Our responses to some of these [national consultations](#) are on our website.

B. DEVELOPMENT PLAN ENGAGEMENT

In our role as a [Key Agency](#), we advise planning authorities at every stage of the development planning process. We play an active role in guiding development to the right places, and we promote the historic environment at the heart of placemaking. We also offer advice to planning authorities on their development plan policies to ensure that our historic environment is given an appropriate level of protection within the planning system.

We are a Consultation Authority for [Strategic Environmental Assessment](#) (SEA), and almost half of the SEA consultations we respond to relate to development planning. We advise planning authorities on the assessment and reporting of environmental effects resulting from these plans for growth and regeneration. This helps ensure that development is planned in a sustainable way and that potential effects on the historic environment are fully considered in the plan-making process.

We have continued to support development plan preparation, including participation in several [Transforming Planning](#) working groups. We worked closely with our partners in Local Government, particularly the [Heads of Planning Scotland](#) Development Plan sub-committee, on how we can support evidence gathering for new plans. This included working in collaboration with fellow key agencies to collate environmental and other planning information that can support good planning decisions and outcomes. In collaboration with other Key Agencies we [piloted a new approach](#) to our engagement. This has involved partnering with 6 Local Authorities and working together with an emphasis on place and in line with our commitment to the Place Principle (see Highlight 2).

HIGHLIGHT 2: A NEW APPROACH TO LOCAL DEVELOPMENT PLANNING

Regulatory framework principles:

- **Transparent**
- **Consistent**

Regulatory framework goals:

- **Valuing our heritage**
- **Building a better future**
- **Empowering communities**
- **Improving equality**
- **Responding to our changing climate**

In May 2023 new regulations covering Local Development Planning came into force in Scotland. This signalled the start for all local authorities to prepare a new style of plans. The Scottish Government expects these to be delivered with a focus on people and place. In advance, and as part of our commitment to the Place Principle, we have been working collaboratively with our Key Agency partners to develop and deliver an offer to local authorities which will see us work together to support a place-based approach to these new plans.

Following a call for expressions of interest, six local authorities were chosen to act as pilots for developing a new way of working in collaboration with the Key Agencies, which include HES and other national public bodies. The local authorities were Dundee, Fife, Highland, Midlothian, Renfrewshire and the Western Isles. The Key Agency Group has been meeting with these authorities, developing a series of workshops bringing together those with a role to play in the delivery of sustainable, liveable and productive places through planning. As well as the pilot areas we continue to work with all local authorities on the preparation of their new Local Development Plans.

In working collaboratively in development planning we recognise that the historic environment has an integral part to play in how we plan for our future.

As [Our Past Our Future](#) notes, traditional buildings are estimated to make up 19% of our building stock, 33% of our retail space and 41% of our office space. This national resource will play a key part in delivering place-based outcomes that contribute across many policy areas as well as cultural identity, the health and wellbeing of communities and delivery against our Net Zero targets.



C. DEVELOPMENT MANAGEMENT

Our role in relation to development management is mainly advisory. We are a statutory consultee for planning applications affecting historic environment assets designated as being of national importance, applications for listed building consent and applications for conservation area consent. We are a named consultation body for applications requiring Environmental Impact Assessment (EIA). We are the regulator (decision-maker) for consent for works on scheduled monuments.

A wide range of actions and interventions are required to achieve overall Net Zero by 2045 (see Highlight 3). These will undoubtedly impact on the historic environment and will require advice from across our planning service including forestry, peatland restoration and other 'nature-based solutions'. We predict increased numbers of consultation with us and other statutory consultees over the next five years and we are currently exploring ways to best manage these pressures. We monitored the impact of rising application numbers throughout the year, and its impact on our staff and service, and carried out a workforce planning exercise.

HIGHLIGHT 3: CLIMATE CHANGE INFRASTRUCTURE

Regulatory framework principles:

- **Proportionate**
- **Targeted**

Regulatory framework goals:

- **Looking after our heritage**
- **Building a better future**
- **Responding to our changing climate**

In the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, the Scottish Government formalised their intention for Scotland to reach Net Zero carbon emissions by 2045, a world-leading target. This commitment has determined policy and practice in all areas of development and conservation. It has changed the character of our work, with huge growth in consultations relating to renewable power developments, onshore and offshore, and the infrastructure to support these.

Pre-application consultations for onshore wind farms have risen 530% since 2018, with applications rising by 32%. The increase in pre-application consultations reflects the increasing complexity of these developments, as both the scale of turbines and the size of developments increase, and the remaining land available decreases. Frequently, onshore windfarms are now associated with battery energy storage and green-hydrogen production facilities, to allow surplus energy to be stored.

Offshore windfarm applications have risen by 45% and include bigger turbines and developments. Scotwind is a group of offshore projects on land leased from the Crown Estate which will greatly increase the area of offshore wind turbines. We have also seen a marked increase in consultations relating to large-scale solar generation (470%).

To support the transmission of power generated by these developments, the infrastructure in Scotland, managed by SSEN and Scottish Power in the north and south of the country respectively, needs to be increased, improved and reinforced. Consultations about grid improvements have grown by 113% since 2018. Many of these improvements offer a very large capacity, long and substantial lines to transmit power from the north to the south of the country, or south to England and Wales. We need to respond to these consultations in short, accelerated, time-scales, to ensure that the proposed lines are in place by 2030 and to minimise any harm to the historic environment.

We have undertaken workforce planning to help plan and build our capacity to deal with these increasing demands. This will help us support government's Net Zero goals, while making sure the right development is in the right place.



CAPACITY BUILDING

D. SHARING GOOD PRACTICE, SKILLS AND KNOWLEDGE

We work across the planning and development sector to promote the historic environment and share skills, knowledge, and good practice. We engage with several national groups including the Heads of Planning Group, the Royal Town Planning Institute, the Key Agencies Group, and the Built Environment Forum for Scotland (BEFS) historic environment working group.

By engaging and working with local communities to support, value, and re-invigorate the landscape, the Partnership seeks to deliver a wide range of projects over five years (2020-2025). The project has been awarded a Historic Environment Scotland grant for an Oral History and Place Names Project and we contributed to its development.

PARTNERSHIP PROJECTS

Throughout the reporting year we participated in a range of partnership projects with key stakeholders, communities of place and communities of interest. These projects provide opportunities for sharing knowledge and expertise.

We continue to engage with the [Coalfield Communities Landscape Partnership](#), led by East Ayrshire Council.

We have begun work as part of [The Leven Programme](#) to develop a Heritage Framework to help guide the planning and delivery of long-term benefits for people and the environment of the River Leven through their shared heritage.

GARNOCK CONNECTIONS LANDSCAPE PARTNERSHIP

The [Garnock Connections Landscape Partnership](#) concluded in the reporting year, and we continue to act as advisors on its legacy. The Partnership is a collaboration with RSPB Scotland, North Ayrshire Council, SEPA, NatureScot and the Scottish Wildlife Trust. It is supported by grants from the National Lottery Heritage Fund and other funders.

GALLOWAY GLENS LANDSCAPE PARTNERSHIP SCHEME

We are advisors for the [Galloway Glens Landscape Partnership Scheme](#). The project is a partnership of local and national bodies, including Dumfries & Galloway Council, Forestry and Land Scotland, NatureScot, SEPA, the Galloway Biosphere and others. The scheme, due to end in October 2023, is delivering a suite of projects to improve the condition of, understanding and engagement with, and access to the cultural and natural heritage of the Galloway Glens.

TRAINING AND OUTREACH

In our commitment to sharing good practice across the sector, we regularly engage in training and outreach, and examples are:

- a two-day training session on Strategic Environmental Assessment (SEA) to our staff and colleagues at NatureScot, The Scottish Environment Protection Agency and Marine Scotland, providing an overview of the purpose of SEA, advice on reviewing or producing reports and discussions around various case studies, with a focus on marine planning. (Nov 2022)
- a presentation and Q&A session about planning and historic windows to Moray Council's elected members (Nov 2022).
- presentation and Q&A session on the work of the Buildings At Risk Register with a focus on Fife to the Dunfermline Historical Society (April 2022) and to the Royal Incorporation of Architects Scotland (October).
- a session to students on the Dundee University Planning Course about our role in the planning system and the tools available to inform decisions about the historic environment (March 2023).

This year we consulted on an updated Managing Change guidance on Fire and Historic Buildings, which will be published in November 2023 (see Highlight 4). We also developed a position statement on the climate and nature crises, setting out how our regulatory and advisory work can contribute. The results of this were published in summer 2023: [Pointing the Way to the Future](#). The approach will be an important influence on our future guidance.

POLICY AND GUIDANCE

One of the ways we build capacity and share good practice across the sector is by ensuring that our key policy and guidance documents are up to date and fit for purpose. To help us achieve this we established a small team to work on this during the reporting year. This will allow us to run a more regular programme of guidance updates. We will run external engagement in the sector to agree the key drivers for new and updated guidance and aim to agree key priorities in the first half of 2024.

HIGHLIGHT 4: UPDATING MANAGING CHANGE GUIDANCE ON FIRE AND HISTORIC BUILDINGS

Regulatory framework principles:

- **Transparent**
- **Consistent**

Regulatory framework goals:

- **Looking after our heritage**
- **Building a better future**
- **Empowering communities**

Our current [Managing Change](#) guidance note called [Fire Safety Management](#) was published in 2015. The policy context has changed a lot since then. In 2019, we published the [Historic Environment Policy for Scotland](#) (HEPS), and in 2023 the new National Planning Framework (NPF4) was adopted.

The role of the [Managing Change](#) guidance series is to support good decision making when proposed changes may affect the historic environment. The guidance reflects the policies and principles set out in HEPS, and policy 7 a) of NPF4 refers to national guidance on managing change in the historic environment.

RECENT FIRES IN HISTORIC BUILDINGS

There have been other triggers for a review of this guidance. One of these was the 2018 fire at the [Glasgow School of Art](#), which caused very significant damage and led to important conversations about how to approach restoring the building.

In 2017, two people lost their lives in a fire at [Cameron House](#) on Loch Lomond. The [fatal accident inquiry](#) looked in detail at building fire safety. One of the key messages to come out of this was the potential benefit of encouraging the use of automatic fire suppression systems in historic buildings.

UPDATING THE GUIDANCE

Our priorities in updating the guidance were to reflect national policies and support decision makers to

enable change that protects human life, and the historic environment in the long term. It contains an updated section on fire risks in historic buildings, such as voids and large open spaces through which fire can spread quickly, and unpredictable layouts which can hamper firefighting. The redrafted guidance also refers to automatic fire suppression systems in some detail and identifies ways impacts on historic fabric can be avoided or reduced. It includes a link to the Scottish Fire and Rescue Service's [myth-busting web page](#).

PUBLIC CONSULTATION

We held a [consultation on the revised guidance](#) on Citizen Space from December 2022 to March 2023 and received nine responses. Among other questions the consultation asked people to identify any areas where the guidance could highlight issues about climate mitigation and adaptation.

We received very helpful responses on this, recommending that we highlight the value historic buildings have as part of our circular economy and the importance of keeping them in use as part of our journey to zero waste. This has influenced the guidance and we included a new key message: Reducing fire risk and restoring damaged buildings keeps historic buildings in use as part of our circular economy. This protects their contribution to our places, communities and identities and supports a just transition to Net Zero.

NEXT STEPS

The guidance will be published later in 2023 and we will also produce [case studies associated with our Managing Change guidance](#) and will explore targeting those for this guidance to issues that have arisen in recent cases, including the Cameron House fatal accident inquiry.

KEY AGENCIES GROUP

As one of the public bodies in the [Key Agencies Group](#) (KAG) we work to share information and support decision-making in the planning system. In the reporting year KAG engaged closely with the ongoing reforms to the planning system.

Other key initiatives by KAG to support the culture change and improved joint-working required as part of the reforms included collaborative approaches to placemaking, the use of environmental evidence in development planning, and promoting skills development across the sector. We provided feedback via the [High-Level Group on Planning Performance](#) and shared our experience of working with new policies within NPF4.

E. EVIDENCE AND DATA-SHARING

We continue to add information about the historic environment to our websites both from external contributors, and through our own survey programmes and desk-based assessment. This information supports heritage management, planning and research, and promotes the resilience of the historic environment through knowledge. We have progressed plans to improve access to our datasets and we hope this will provide a range of enhancements to our current planning services.

We share data with local authority Historic Environment Records (HER). We make our information freely available online through PastMap, which includes links to the data of participating HERs. Our data is available to download from our decisions portal and through a range of websites, with over three million user visits this year.

Through the Heritage Hub project, we are bringing together the information, images, and data that is currently spread across many of our websites. This new website, which will act as a single gateway, has been in development throughout 2022-23 and will launch to the public in 2024. The existing websites will continue to operate in parallel until all the information that they contain has been successfully added to the new website.

We publish an online quarterly heritage newsletter called [Lintel](#). It showcases what we're doing in our Directorate and highlights a range of stories, as well as events, survey and consultations. You can sign up to Lintel [here](#).

BUILDINGS AT RISK REGISTER

Following a review of our directorate's structure the [Buildings at Risk Register](#) team joined our Planning, Consents and Advice Service this year. The Register was established in 1990 as a tool to provide information on historic buildings at risk and promote their reuse. Just under 2,200 buildings are currently on the register.

We are keen to make sure the register is as effective as possible, and we undertook an informal survey of its users to help us understand how it is used now and how our users thought it could develop. The results were interesting but didn't produce a consensus. To help us move forward we have commissioned external consultants to undertake a more formal review that will report in 2023-24. The team are continuing to work on keeping the register up to date while the review is underway (see Highlight 5).

HIGHLIGHT 5: SURVEYING BUILDINGS AT RISK IN SHETLAND

Regulatory framework principles:

- Targeted
- Consistent

Regulatory framework goals:

- Valuing our heritage
- Building a better future

In October 2022 we visited Shetland to refresh the Buildings at Risk Register (BARR). We undertake a full review of the Register in each local authority area cyclically, working in partnership with council officers and local stakeholders, adopting a place-based approach. In Shetland, our survey focused on long-term building disuse and the recent restructuring of the Church of Scotland estate. Over 20 churches had recently been declared surplus to requirements as part of the reorganisation of the Aberdeen and Shetland Presbytery.

Churches have historically been the focus of community life across the islands, so we carried out a joint survey with Heritage Recording and Archaeology Service.

The team collaborated to assess buildings for the At-Risk Register and record churches in their ecclesiastical use before they became vacant or were re-used.

The key findings were:

- No At-Risk buildings have been demolished but many are now long-term At-Risk.
- Creative solutions will be needed for At-Risk buildings on Shetland's coastline to counter issues of coastal erosion and climate change.
- The modest scale and rural locations of recently disused churches may have increased their appeal as many are already proposed for re-use as community spaces or dwellings.

We are working with Shetland Islands Council to use the new data to inform and promote regeneration of historic buildings at risk. The challenge for island communities to secure traditional building skills and materials has been highlighted during these conversations. Colleagues from across HES are exploring potential partnership approaches to address these shortages.



SERVICE

F. DECISION-MAKING TIMESCALES

Our Headline Indicators for 2022-23 are consistent with previous years, showing a high level of service across all our planning roles. These cover our timescales for decision-making and consultation responses across the following areas:

- Development planning
- Strategic environmental assessment
- Environmental impact assessment
- Development management
- Listed building and conservation area consents
- Scheduled monument consent

In this section we report on our main activities associated with the planning process and include:

- Scheduled monument enforcement
- Scheduled monument condition monitoring

- Designations
- Complaints handling

DEVELOPMENT PLANNING

During 2022-23 we were consulted on 16 development plan related cases, responding to 93.75% within required timescales. This low number of cases was expected, because of the implementation of a new [development planning](#) process with new development planning regulations and guidance. We anticipate that development planning activity will increase significantly in 2023-24.

TABLE 2: DEVELOPMENT PLAN CONSULTATIONS

Consultation Type	2022-23	2021-22	2020-21	2019-20
Pre-Main Issues Report	0	1	1	9
Main Issues Reports	0	1	4	4
Draft Proposed Plans	2	6	5	2
Proposed Plans	1	3	5	5
Modified Plans	0	0	0	1
Action Programmes	2	1	2	4
Examination / Further Information Request	0	0	0	4
Supplementary Guidance	11	8	13	22
Total	16	20	30	51
% statutory development plan consultation responses within required timescale	93.75%	100%	100%	100%

STRATEGIC ENVIRONMENTAL ASSESMENT

During 2022-23 we received 119 Strategic Environmental Assessment (SEA) consultations, a slight increase on 2021-22. We responded to 100% of these consultations within the required timescales. We have seen an increase in climate change related plans, including initial work on Local Heat and Energy Efficiency Strategies across many of our local authorities.

TABLE 3: STRATEGIC ENVIRONMENTAL ASSESMENTS

Consultation Type	Target (days)	2022-23	2021-22	2020-21	2019-20
Screening Report	28	58 (100%)	68 (100%)	55 (100%)	102 (99%)
Scoping Report	35	34 (100%)	24 (100%)	17 (100%)	22 (100%)
Environmental Report	As agreed (typically 6 weeks)	27 (100%)	22 (100%)	20 (100%)	32 (100%)
Total		119 (100%)	114 (100%)	92 (100%)	163 (100%)

ENVIRONMENTAL IMPACT ASSESMENT

During 2022-23 we received 305 Environmental Impact Assessment (EIA) consultations and responded to 98% within agreed timescales. There was a small decrease in the number of EIA consultations we received compared to 2021-22, but the size and complexity of proposals has increased (see Highlight 6). Other EIA consultations including wind energy, solar energy, electrical grid infrastructure, harbour and flood alleviation works, transport projects, and large scale residential and tourism developments.

TABLE 4: ENVIRONMENTAL IMPACT ASSESMENT

Consultation Type	Target (days)	2022-23	2021-22	2020-21	2019-20
Screening Report	35	29 (100%)	34 (100%)	34 (97%)	36 (99%)
Scoping Report	35	161 (100%)	137 (100%)	105 (99%)	120 (99%)
Environmental Report	As agreed (typically 6 weeks)	91 (100%)	105 (99%)	101 (100%)	104 (100%)
EIA Addendum	As agreed (typically 6 weeks)	43 (100%)	48 (100%)	49 (100%)	50 (96%)
Total		305 (98%)	324 (99%)	289 (99%)	310 (99%)

HIGHLIGHT 6: ORKNEY COMMUNITY WINDFARMS

Regulatory framework principles:

- **Transparent**
- **Consistent**
- **Proportionate**

Regulatory framework goals:

Looking after our heritage

- **Valuing our heritage**

In December 2022 an application for six wind turbines on the island of Faray, Orkney, received consent. We objected to the application because of the potential impacts of the proposal on the setting of Quoy Neolithic chambered cairn, a nationally important scheduled monument.

The application was the third of three decisions relating to Orkney Council's community windfarms. The other two, at Quanterness, St Ola, and Lyness, Hoy, were consented in December 2021. We objected to the Quanterness development because of the impacts on the setting of three chambered cairns, and to the development on Hoy because of impacts on the setting of a Category A-listed former naval headquarters. For all three we concluded that the proposed developments were not consistent with national policy relating to the historic environment.

The applications were called in for Scottish Ministers' determination because they raised matters of national importance in the context of expectations set out in National Planning Framework 3 for the Pentland Firth and Orkney Waters area and the need for an enhanced high voltage energy transmission network, and to avoid any conflict of interest because the Council was the applicant. The reporters (one for each case) from the Scottish

Government's Planning and Environmental Appeals Division, considered the cases and provided a report and recommendation for Ministers. In each case the reporter recommended refusal of the application because the benefits of the development would not justify the level of harm to the historic environment. Scottish Ministers disagreed and granted permission, concluding that the climate emergency, national energy and carbon reduction targets, and the need for an electrical interconnector represented exceptional circumstances and overriding public need.

In reviewing our approach to these cases, we are satisfied that our analysis of the potential impacts of the developments was proportionate. This helped the reporters and Scottish Ministers to balance historic environment impacts against the need for the developments. We are pleased that that our advice was accepted in both the reporter's findings and Scottish Ministers' decision notices.

For the Hoy site, Scottish Ministers stated that prior to construction, a plan for the maintenance, enhancement and interpretation of the former naval headquarters building must be approved by the planning authority. We hope that plan will ensure the long-term future of the former naval headquarters and improve access and interpretation.



DEVELOPMENT MANAGEMENT CONSULTATIONS

Our development management headline indicators reflect our response timescales for the following consultation types:

- Planning applications
- Listed building consent
- Conservation area consent

Planning authorities normally allow us 21 days to respond to these consultations, but we have agreed a target of responding within 14 days as part of our commitment to providing a high standard and responsive level of service.

TABLE 5: DEVELOPMENT MANAGEMENT CONSULTATIONS

Consultation Type	Target (days)	Target (%)	2022-23	2021-22	2020-21	2019-20
Planning Consent	14	90%	995 (93%)	1016 (93%)	890 (96%)	880 (93%)
Listed Building Consent	14	90%	2684 (97%)	2752 (98%)	2254 (97%)	2759 (97%)
Conservation Area Consent	14	90%	85 (89%)	91 (86%)	89 (92%)	126 (83%)
Total			3764 (96%)	3859 (97%)	3233 (96%)	3765 (96%)

HIGHLIGHT 7: ASSESSING THE IMPACT OF OUR ADVICE ON HISTORIC BUILDINGS

Regulatory framework principles:

- **Transparent**
- **Accountable**

Regulatory framework goals:

- **Looking after our heritage**
- **Building a better future**

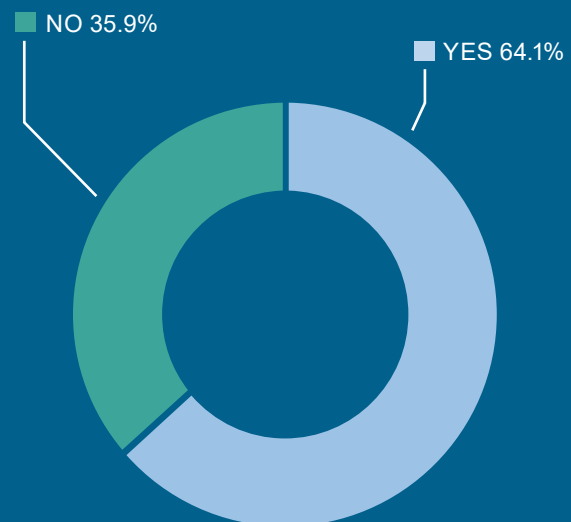
We are a statutory consultee for listed building consent applications and our advice is a material consideration in their determination. In early 2023 we decided to gather evidence about the impact of our advice in a new way. We looked at the impact of our advice in 2021. In that year we were consulted on 2690 LBC applications across Scotland and provided advice on 649. We reviewed 432 applications, or 67%, of those.

The results demonstrated that our advice strongly influences decisions about listed buildings by planning authorities. While there is some variation, we found that 72% of our comments were engaged with when the planning authority came to their decision. Our advice influenced outcomes positively for the historic environment in 64% of all applications we commented on.

If we extrapolate these results for all consultations, we estimated that we had a positive influence on 415 developments across Scotland in 2021.

We plan to run this analysis regularly to track trends and make sure we are maintaining or increasing our positive impact. We have also used the results to engage with our stakeholders in planning authorities to make sure our advice remains relevant and useful. The results have provided invaluable evidence for the value we bring to the historic environment using our influence in the planning system and where we can make improvements.

TABLE 6: INFLUENCE OF OUR ADVICE ON THE DECISION AND OUTCOME



Colleagues on a site visit at North Bridge, Edinburgh © HES

PLANNING APPLICATIONS

In 2022-23 we were consulted on 995 planning applications, 21 less than last year. Throughout the year we maintained a high level of service, responding to 96% within our target timescales, exceeding our target of 90%. 37 (47%) of responses were objections, similar to 2021-22. We also provided pre-application advice on 153 planning applications, similar to the last reporting period (152).

LISTED BUILDING CONSENT

In 2022-23 we were consulted on 2684 listed building consent applications, a similar number to the previous year. We responded to 96% within the required timescale, exceeding our 90% target. 18 (less than 1%) were objections, and a similar figure to previous years. Our advice helps to secure sustainable futures for our listed buildings (see Highlight 8 & 9). In addition to our statutory advice, we provided formal pre-application advice on 164 listed building consent applications, slightly higher than previous years. There was a significant rise in general correspondence related to listed buildings and we improve identification of early planning enquiries to report this trend more clearly.

HIGHLIGHT 8: THE CHANGING FACE OF PRINCES STREET

Regulatory framework principles:

- Targeted
- Proportionate

Regulatory framework goals:

- Looking after our heritage
- Valuing our heritage
- Building a better future

Over the past year, we have received consultations from the City of Edinburgh Council about proposals for alterations to some of Princes Street's most important listed buildings. While each case and each building was different, they had common issues, such as vacant upper floors, lack of escape stairs, heavily altered interiors, the implications of change of use for Building Standards and requiring more floor space in the form of new floors and extensions.

We found that the proposed end uses for the schemes were similar, such as retaining retail space at ground and/or basement and first floor levels, with hotel and restaurants at first floor and above, often with a rooftop bar.

For each consultation, we provided advice on the special interest of the buildings (some contained two or three distinct buildings) and how changes to them could be handled sensitively while keeping them in use.

We offered advice on how to avoid or reduce impacts on the more significant parts of the buildings (such as original staircases, windows, decorative plasterwork or scale and size of new extensions and extra storeys). If you want to find out more about the history of the street, how it has changed over time and how we are helping give it a positive future, you can read more in our [blog](#).



HIGHLIGHT 9: FINDING A FUTURE FOR FORMER PLACES OF WORSHIP

Regulatory framework principles:

- Targeted
- Proportionate
- Consistent

Regulatory framework goals:

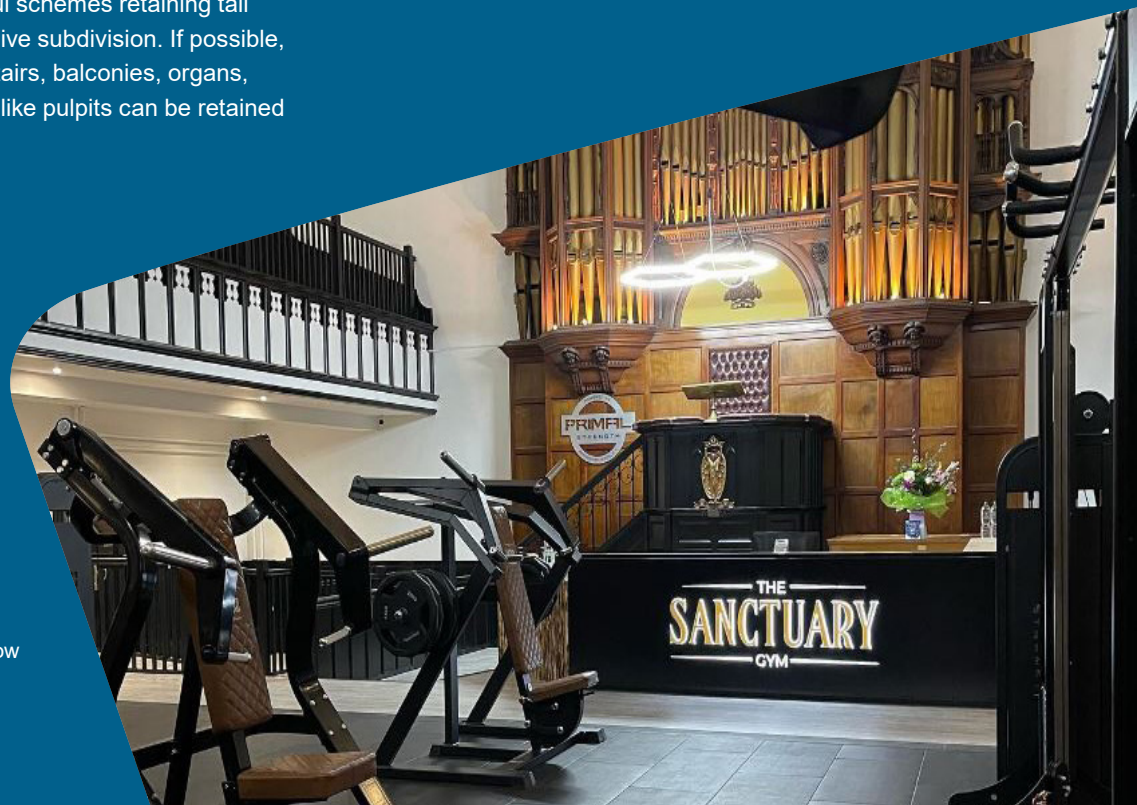
- Looking after our heritage
- Valuing our heritage
- Building a better future
- Empowering communities

Scotland has a long and successful track record in reusing historic buildings. Following a review of the Church of Scotland estate, we have seen an increasing number of proposals for former places of worship. Churches are often the oldest and most significant buildings in a community and our approach aims to find new uses.

We provide advice for reuse that retains the building's character and interest, both externally and inside, as far as possible. The spatial quality of an interior is often key, with the most successful schemes retaining tall open spaces without excessive subdivision. If possible, important fixtures such as stairs, balconies, organs, memorials and even joinery like pulpits can be retained and incorporated.

We see a huge variety of new uses: pubs, theatres, galleries, music venues, climbing walls, gyms, and even a tattoo parlour. In Torphins, Aberdeenshire, supermarket aisles have replaced ecclesiastical ones. Some can be new places of worship for other denominations or taken over by the local community, continuing a role at the centre of public life.

Conversion to residential use is common, and often the most economically viable solution. Whilst this can work well in small rural churches, where single dwellings with open-plan accommodation can be created, it is more difficult to manage sensitively in large church conversions. An example where a church was converted to a gym is pictured below. The reuse of churches will continue to be an issue for many years, however, reuse schemes have repaired and largely retained the character of many churches, safeguarding their future.



CONSERVATION AREA CONSENT

We were consulted on 85 conservation area consent applications, a similar number to last year (91). We responded to 89% of these consultations within the required timescale, just short of our target of 90%. This reflects that these applications are only for demolition, so tend to be complex. Eight of our responses were objections, representing 9% of our overall responses, a similar proportion to previous years. In addition to our statutory advice, we provided pre-application advice on some conservation area consent applications.

SCHEDULED MONUMENT CONSENT

Scheduled monument consent is used to ensure that any changes to monuments of national importance are appropriate and sympathetic to their character. Works on scheduled monuments, including repairs, require consent. Crown bodies (government departments or executive agencies) are not required to apply for scheduled monument consent. Instead, these bodies apply to us for scheduled monument clearance. Metal and mineral detecting consent is required for the use of any equipment capable of detecting metal or minerals on scheduled monuments. This includes metal detectors, magnetometry/gradiometer surveys, and ground penetrating radar.

We processed 241 applications for scheduled monument consent, scheduled monument clearance and metal and mineral detection consent, a 20% increase on the previous year. We processed 223 of these (92.5%) within

8 weeks, exceeding our target of 90%. The increase in the overall number of applications is related to an increase in the number of applications from HES Estates, due to work on Properties in Care resulting from [high-level masonry safety inspections](#).

HES has a duty to notify Scottish Ministers where we are minded to grant scheduled monument consent for works which would allow a greater level of intervention than the minimum level that is consistent with conserving what is culturally significant in a monument. There is no requirement to notify clearance or metal and mineral detecting consent applications. In 2022-23, we notified 6 applications (2.8%). 100% of scheduled monument clearance and 74% of metal and mineral detecting consent applications were determined within eight weeks.

All our scheduled monument consent decisions are published through our [decisions portal](#). The Historic Environment Scotland Act 2014 introduced a right of appeal against scheduled monument consent decisions. One of our decisions was appealed although this was withdrawn and subsequently handled through re-application.

TABLE 7: SCHEDULED MONUMENT CONSULTATIONS

Consultation type	Agreed Timescale	Target %	2022-23	2021-22	2020-21	2019-20
Scheduled Monument Consent Applications	8 weeks	90%	212 (94%)	197 (85%)	230 (86%)	317 (94%)
Scheduled Monument Clearance Applications	8 weeks	90%	6 (100%)	9 (100%)	13 (92%)	9 (100%)
Metal and Mineral Detecting Consent	8 weeks	90%	23 (74%)	24 (100%)	17 (100%)	22 (100%)
Total			241 (92%)	230 (87%)	260 (87%)	348 (95%)

SCHEDULED MONUMENT ENFORCEMENT

Reports of unauthorised works on scheduled monuments remained at a similar level to 2021-22. Cases of metal detecting remained at the relatively high level seen over the last three years, with reports of camping/fires at scheduled monuments returning to levels seen during the pandemic. Incidents of vandalism and graffiti also remained high. We have designed improved signage and offer this free of charge to owners of scheduled monuments to help raise awareness of heritage crime and reduce incidents.

We have continued to work with owners and others to secure informal resolution for unauthorised works that could be undone or repaired, with double the number of cases resolved. No enforcement or stop notices were issued within the reporting period. Two instances of illegal metal detecting were investigated with Police Scotland and reported to the procurator fiscal, resulting in the issuing of two fiscal warnings.

TABLE 8: SCHEDULED MONUMENT ENFORCEMENT MEASURES

Consultation Type	2022-23	2021-22	2020-21	2019-20
Reports of Unauthorised Works	207	203	166	160
Advisory Letters	18	19	18	24
Informal Resolutions	33	16	12	21
Warnings	1	0	3	4
Enforcement Notices	0	0	2	0
Referral to Procurator Fiscal	2	0	2	2
Total	261	238	203	211

SCHEDULED MONUMENT CONDITION MONITORING

We monitor the condition of scheduled monuments and meet owners and land managers as a key part of our duty to care for the historic environment. Regular engagement is key to preventing accidental damage or unauthorised works as scheduled monuments can easily be overlooked and are sometimes buried below ground, so reminding owners about them is important. We can recommend changes to improve the condition of monuments (see Highlight 10).

During visits we record the condition of monuments. This information forms part of Scotland's Historic Environment Audit and allows us to understand and respond to nationwide change. Most years we visit 500-700 scheduled monuments and assess aerial photographs of a further 250.

In 2022-23 we monitored the condition of 721 scheduled monuments. 582 were assessed by field visits and 139 assessed from aerial photographs. 612 monuments (85%) were in satisfactory condition. The data cannot be compared simply with previous years because each year we visit a different subset of monuments for different reasons, but the proportion in satisfactory condition is broadly in line with recent years – annual figures fluctuate between about 70% and 90%.

HIGHLIGHT 10: HELPING MANAGE MONUMENTS

Regulatory framework principles:

- Targeted
- Transparent

Regulatory framework goals:

- Looking after our heritage
- Valuing our heritage
- Building a better future
- Empowering communities
- Improving equality

Our modest Monument Management Fund is targeted at assisting with work that helps to positively manage both scheduled and undesignated monuments. In 2022-23 a total of 25 projects received funding totalling almost £84k. Funding for individual projects ranged in value from around £200 to just over £23k. The projects were spread across Scotland in 11 local authority areas.

This year's programme saw the condition of ten

monuments improved with works to remove vegetation or consolidate masonry. Investigative surveys, assessments or conservation reports were undertaken on 12 monuments, providing a basis for future conservation works. We also supported a conservation management plan and drawing package for a Category A listed building. A key benefit of our programme is the positive engagement it encourages with stakeholders, complementing our regulatory work and demonstrating a commitment to help owners and others look after monuments. This year we worked with 21 individuals or groups who own or manage monuments, helping to promote improved long-term management. The fund helps to incentivise very small but important changes and can assist at an early stage to help projects get off the ground.

One significant project this year was at Blervie Castle in Moray. Temporary stabilisation work was designed and installed to protect a fireplace and prevent damage or collapse, as recommended by our architect. A high-level inspection and photographic survey were carried out to ensure the safety of contractors and also provided an updated condition report.



Hall Fireplace at Blervie Castle after stabilisation
© Craig Anderson

DESIGNATIONS

Maintaining accurate records is key to understanding designated sites and places and giving them appropriate weight in the planning process. There are currently over 55,000 national designations which include scheduled monuments, listed buildings, gardens and designed landscapes, battlefields, and historic marine protected areas. We designate new sites and places every year. We also remove designations where sites and places no longer meet the relevant criteria.

This year, we made 396 designation decisions, a reduction on the average of previous years. This number includes decisions to designate new sites and places, and decisions to amend or remove existing designations. It also includes minor record changes. The largest reduction is in minor record changes. This is primarily through reduction in project work, as a conscious decision to focus on progressing cases that have been in the system for a length of time (in some cases from 2-5 years) due to the difficulty in progressing cases during the pandemic.

The number of decisions reflects a continuation of the trend towards broadening our engagement with the public on our designations work. We have prepared a consultation protocol to set out our approach, involving earlier engagement to ensure that we have an inclusive understanding of cultural significance, and understand the circumstances of cases at an early stage. Our protocol will be launched in 2024.

We responded to public and political interest in how the Inventory of Historic Battlefields has interacted with the planning system since its creation 10 years ago. This is explored in Highlight 11.

Four listing appeals were submitted this year. All have been dismissed by the Reporter. Three out of four Certificate of Intention Not to List applications were confirmed, meaning that a building will not be listed for five years from the date the certificate is granted.

Amendments are material changes to designations. These alter what is designated. For scheduled monuments, Inventory gardens and designed landscapes, and Inventory battlefields, this is a change to the description or

the boundary map of the designated area. For listed buildings, this is a change to the address in the listing.

Minor record changes are updates to the supplementary information which describe the site or place, identify its location or provide additional references or data. These cases reflect ongoing maintenance of our designation records. The following table sets out the changes made to scheduled monuments, listed buildings, gardens and designed landscapes, and battlefields designations. There have been no changes to historic marine protected areas this year.

TABLE 9: DESIGNATION MAINTENANCE

Designation	Maintenance Type	2022-23	2021-22	2020-21	2019-20
Scheduled Monuments	Designations (additions to the Schedule)	18	6	16	7
	Amendments	22	56	21	34
	Minor record changes	117	394	132	335
	Removal from Schedule	2	24	21	55
	Appeals	0	0	0	0
Listed Buildings	Designations (additions to the List)	15	12	32	42
	Amendments	25	54	59	88
	Minor record changes	109	212	209	451
	Removal from List	20	28	51	112
	Appeals	4	6	2	3
	Certificates of Intention Not To List (COINTL)	4	1	2	2
Gardens and Designed Landscapes	Designations (additions to the Inventory)	0	1	1	1
	Amendments	0	1	1	1
	Minor record changes	1	3	13	4
	Removal from Inventory	0	0	0	0
Battlefields	Designations (additions to the Inventory)	0	0	0	0
	Amendments	0	0	0	1
	Minor record changes	2	3	1	0
	Removal from Inventory	0	0	0	1
Total number of designation decisions (including all designations and other work not mentioned above)		396	801	769	1434

COMPLAINTS HANDLING AND INFORMATION REQUESTS

DESIGNATIONS

Our [complaints handling procedure](#) is on our website. The guidance was updated last year in line with a new complaints handling procedure provided by the Scottish Public Services Ombudsman.

This year we received three formal complaints. One, relating to unauthorised magnet fishing on Scotland's canals, was handled under stage one (frontline resolution). It was partially upheld because we acknowledged that further follow-up when we get reports of unauthorised magnet fishing might be required. We worked with Scottish Canals on this solution.

Two of our formal complaints were handled under stage two (investigation) of our complaints handling procedure. One of these complaints was partially upheld, the other was not upheld.

The complaint that was partially upheld related to health and safety at a privately-owned scheduled monument where an accident occurred at the site, which is open to the public. The people affected attributed the accident to what they considered to be misleading signage routinely provided to owners of scheduled monuments by us. We concluded that health and safety at sites like this is the responsibility of the owner. We did, however, agree to change the wording on the signs we supply to owners to make it clearer that we do not own the sites and that the signs relate only to the protection of the scheduled monuments and not the visitor attraction itself.

The third stage two complaint was not upheld. This related to a visitor to a privately-owned scheduled monument on an open day believing we had parked one of our vehicles inconsiderately. Our investigation found that the vehicle did not belong to us, and we explained this to the complainant, apologising for the misunderstanding.

INFORMATION REQUESTS

We received 24 information requests; all were handled under the Environmental Information (Scotland) Regulations 2004. Of these, the information was released

for five, partially released for 16, withheld for one, and not held for two. No reviews of our decisions were requested. Most of these requests related to information about heritage assets, their designation or advice/decisions we gave as part of a change management process.

G. SERVICE STATEMENTS AND JOINT WORKING AGREEMENTS

JOINT WORKING AGREEMENT BETWEEN SCOTTISH FORESTRY, HES, NATURESCOT AND SEPA

In early 2022, we agreed the terms of a Joint Working Agreement between [Scottish Forestry](#) and its statutory consultees. This agreement supersedes all other previous Concordats or Joint Working Agreements between Scottish Forestry and the other agencies. It will be reviewed in 2026.

The Agreement explains how Scottish Forestry and their Statutory Consultees will work together effectively to deliver forestry alongside historic environment, biodiversity and water policies and legislation. The aim is to promote a more integrated approach to creating and managing Scotland's forests and woodlands, ensuring this takes account of other important factors and assets whilst contributing to economic growth, social wellbeing, and environmental improvements. The Agreement also promotes good working relationships, better mutual understanding, stronger cooperation and clear channels for advice and consultation on policy development and the implementation of forestry consents and approvals.

SECTION 17 MANAGEMENT AGREEMENTS

Section 17 of the Ancient Monuments and Archaeological Areas Act 1979 gives HES powers to enter into an agreement with other parties in relation to the maintenance and preservation of a scheduled monument. All maintenance and preservation works specified within such an agreement have consent under the Ancient Monuments (Class Consents) (Scotland) Order 1996, and do not require separate scheduled monument consent applications. Works carried out within a section 17 agreement are audited on a yearly basis to ensure compliance.

Since 2016 the HES Heritage Directorate has had a Section 17 agreement for minor maintenance works on scheduled monuments across the HES Estate. It was updated in August 2020 to include a temporary annex of minor works required to enable properties to re-open in a Covid-19 safe manner and amended in July 2022 to include an annex listing certain works of high-level tactile inspection and related repair. A review is in process to rationalise and simplify the agreement and ensure it reflects the range of minor repair works that may be required across the estate.

As noted above we have prepared a consultation protocol that will be launched in 2023-4. We have made it simpler for everyone to make representations to our consultations, streamlined our processes and increased our output on a range of social media platforms. We are using [our consultation hub](#) on Citizen Space to raise awareness of public consultations on cases where we think wider public interest is likely.

We have gradually increased our use of the hub and now regularly add consultations for new designations and proposals to amend existing designations where there is a wider public interest in the outcome. We promote the initiation of designation projects and significant cases, using the Citizen Space facility to gather evidence about the cultural significance of sites and places before any designation decisions are proposed. Citizen Space allows us to sign post to our Heritage Portal where our designation proposals are published. It also allows us to create consultation surveys when we anticipate there may be a range of interest across Scotland. This is illustrated by Highlight 11.

H. ENGAGEMENT WITH SERVICE USERS

PUBLIC ENGAGEMENT WITH OUR DECISION MAKING

Last year we added a new function to our decisions portal, which lets members of the public comment on applications for scheduled monument consent. We also started to put an indication of the likely decision-making timescale on each application. This ensures that third parties can comment before we make a final decision. This process is not required by law, but we welcome observations from interested third parties. Further work was undertaken this year on the portal to improve its accessibility, including how to search for all pending designation and SMC decisions.

We also continued to take steps to engage further with the public about our decision-making for designations.

HIGHLIGHT 11: CUMBERNAULD TOWN CENTRE LISTING APPLICATION

Regulatory framework principles:

- **Accountable**
- **Transparent**
- **Consistent**

Regulatory framework goals:

- **Valuing our heritage**
- **Empowering communities**

We want to engage more with the people of Scotland about what's important to them, and what should be recognised and protected through our designations.

We are currently working towards increasing public and stakeholder engagement earlier in this process because it offers a more inclusive understanding of significance. That's what we did with our consultation on Cumbernauld Town Centre after it was proposed for listing in 2022, which provided us with valuable information for our assessment of the significance and has also enhanced our records of the site.

When constructed in the 1960s, the building was recognised as an example of outstanding town centre planning and modern innovation. In recent years it has been more divisive. We know that there are strong and polarised opinions about the building, and we wanted to encourage engagement with our decision-making. We asked owners, the local authority and the public to tell

us as much as they could about their understanding of the cultural significance of the site and for any relevant information about the development and planning context.

We didn't proceed with listing because we established that development proposals were at an advanced stage, a decision taken in line with our policy on development and designation. However, we were able to confirm our view that the building was of special interest and published a detailed report on this. We included the relevant information submitted to us so that anyone interested would have access to all the evidence we reviewed.

We received over 2,000 responses to our public consultation on the designation. It was the biggest response to a listing consultation we've ever had. We also published a comprehensive analysis and have recorded responses. Engaging with more people will help us ensure that we are making good decisions on the best available evidence.

Anyone can propose a site for designation or comment on a designation proposal through our Portal. Recently, we have started to use our Consultation Hub on Citizen Space for more of our work, and we regularly promote new consultations through media and social media.



ENGAGEMENT IN DESIGN REVIEW PANELS

We regularly participate on panels to review and offer advice on design options. We aim to support good development and achieve positive outcomes for the historic environment where possible. This includes contributing to Architecture and Design Scotland's review panels and workshops and participating Local Authority Urban Design Forums, including Glasgow and Edinburgh.

ENGAGEMENT ON POLICY AND GUIDANCE DEVELOPMENT

A key focus for this area of work this year has been to support the introduction of NPF4 and related policy and guidance development in collaboration with the Scottish Government, Key Agencies, industry representatives, Heads of Planning Scotland and other partners across the planning system.

We have continued to work with a range of partners on the monitoring of existing policy and guidance. This has included receiving a study from Lichfields UK to provide evidence-based recommendations that inform best practice in the designation and management of Inventory battlefields in the planning system (see Highlight 12).

HIGHLIGHT 12: REVIEW OF THE INVENTORY OF HISTORIC BATTLEFIELDS

Regulatory framework principles:

- **Accountable**
- **Transparent**
- **Consistent**
- **Proportionate**

Regulatory framework goals:

- **Valuing our heritage**
- **Empowering communities**
- **Looking after our heritage**

The Inventory of Historic Battlefields has 40 sites including some of the biggest, most emotive and most complex historic sites, such as the Battles of Pinkie (1547) and Culloden (1746). Because of the strong feelings associated with battlefields, the way they're managed in the planning system can be contentious, with differing expectations around their protection. The inventory has been the subject of two Scottish Parliamentary petitions in recent years.

In 2022, just after the Inventory's tenth anniversary, we started a review of how battlefields are managed. We're looking at the principles behind the designation, how we define boundaries and how guidance can help strike a balance between protecting what is important and supporting the right development in the right place.

Our consultants, Lichfields UK, prepared recommendations, and we've taken views from the public on their report. The report concluded that: 'while the Inventory and the policy protections which exist around it are functioning as intended, a number of changes could improve its working, provide greater clarity both in terms of designation and guidance for those working with battlefields, manage battlefield archaeological impact more effectively and thereby promote a greater confidence in the system.'

The response from the public to the recommendations was mainly positive with many practical suggestions for improvements. We're currently deciding how to proceed, including further public consultation on any substantive changes to our approach to designating battlefields. We will work closely with planning authorities and others who play a key part in looking after Scotland's most important battlefields.

Learn more about the [Battlefields consultation](#) and report.



SERVICE IMPROVEMENTS

CHANGES TO MEET IMPROVEMENTS FROM 2022-23

TABLE 10: SERVICE IMPROVEMENTS FROM 2022-23

Service improvement actions for 2021-22	Planned outputs	Was the service improvement achieved?
<p>Analysed our Planning, Consents and Advice Service, identified future workforce needs, and adapted our service to address changes to the planning system, new ways of working, and increased level and complexity of casework.</p>	<ul style="list-style-type: none"> • Implemented changes to our service as identified in our analysis of future need. • Survey feedback: the service we provide meets the needs of our customers, stakeholders, and the public. • Reviewed reporting measures for casework activity and supported the work of the National Planning Performance Co-ordinator where relevant. 	<ul style="list-style-type: none"> • Partially achieved – A workforce planning exercise was undertaken and reported. Actions are in progress.
<p>Begun standardised annual stakeholder and public surveys to give us long term baseline information about our services and how we can improve them.</p>	<ul style="list-style-type: none"> • Developed and delivered annual customer survey and monitoring framework. • Developed and delivered supplementary customer feedback mechanisms for specific services. 	<ul style="list-style-type: none"> • Not achieved – This was not achieved because other work had to be prioritised.
<p>Reviewed the purpose and focus of the Buildings at Risk Register.</p>	<ul style="list-style-type: none"> • Surveyed Buildings at Risk Register users & stakeholders and refreshed our service. 	<ul style="list-style-type: none"> • Partially achieved – We undertook our own survey with register users and stakeholders. This provided valuable information and highlighted that a more comprehensive review was needed. We have engaged external consultants to review the service as a result.
<p>Reviewed our letters and the general advice they contain.</p>	<ul style="list-style-type: none"> • Revised response templates in use. 	<ul style="list-style-type: none"> • Partially achieved – We have reviewed our letter templates and some updated drafts have been produced but the work is ongoing.

<p>Trained more colleagues in plain English.</p>	<ul style="list-style-type: none"> • Measured via survey feedback on whether the advice we provide is clear and easy to understand. 	<ul style="list-style-type: none"> • Partially achieved – a development session on communicating clearly is available to colleagues. We have not measured success by survey.
<p>Published our regulatory framework.</p>	<ul style="list-style-type: none"> • Published 	<ul style="list-style-type: none"> • Achieved – See Case Study 1.
<p>Developed a consultation and engagement protocol for our designations service.</p>	<ul style="list-style-type: none"> • Published consultation protocol. 	<ul style="list-style-type: none"> • Partially achieved – a consultation protocol has been developed and will be launched in 2023-24.
<p>We will review our programme for revising our suite of Managing Change guidance documents and prioritise new documents where needed.</p>	<ul style="list-style-type: none"> • Published new guidance on Fire Safety and Works on or near to Scheduled Monuments. 	<ul style="list-style-type: none"> • Partially achieved – a consultation protocol has been developed and will be launched in 2023-24.

SERVICE IMPROVEMENTS FOR 2023-24

Looking forward to 2023-24, we anticipate a range of challenges relating to the delivery of NPF4, Net Zero, new Local Development Planning regulations and the implementation of other planning reforms. Because of this and a range of related factors, we are anticipating a continued increase in casework, both in terms of the number of applications and consultations coming to us and complexity.

We also have some service improvements from the past year that we have partially achieved, which we plan to progress during 2023-24. We will make progress in the following eight key areas.

TABLE 11: SERVICE IMPROVEMENTS FOR 2023-24

Service improvement actions for 2023-24	Planned outputs
Review of Planning Consents and Advice Service by external consultants	Report produced
Plan stakeholder and public surveys to give us long term baseline information about our services and how we can improve them	Plan for implementation
External review of Buildings at Risk Register	Report produced
Publish updated guidance Working on or near Scheduled Monuments	Guidance published
Review approach to offering advice on Local Development Plans focussing on Evidence Reports and early engagement	Participation in Evidence Report pilots and creation of outputs/toolkits
Engaged with the review of EIA scoping for onshore renewables as described in the onshore wind sector deal	Engagement evidenced
Managing Change programme established	MCHE forward programme approved
External review of our approach to world heritage	Review produced



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