



HISTORIC  
ENVIRONMENT  
SCOTLAND

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EACHDRAIDHEIL  
ALBA

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Our case ID: 300038552

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Dear Sir/Madam,

**The Scottish Parliament**  
**Call for Evidence: The Long-Term Financial Sustainability of Local Government**

Thank you for seeking our views on the long term financial sustainability of Local Government. Historic Environment Scotland (HES) is the lead public body set up to investigate, care for and promote our 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), and include the following:

- The historic environment makes a real difference to people's lives
- The historic environment is looked after, protected and managed for the generations to come
- The historic environment makes a broader contribution to the economy of Scotland and its people
- The historic environment inspires a creative and vibrant Scotland
- The historic environment is cared for and championed by a high-performing organisation

### **General Comments**

We welcome the focus given to the financial sustainability of local government as part of this parliamentary inquiry. We recognise that local government plays a vital role in contributing to the on-going care and enjoyment of our historic environment. Councils have important responsibilities for the upkeep and protection of the heritage in their areas through management regimes including the Scottish Planning System and through the operation of numerous historic places, buildings and structures that form part of their estates. Local government service provision also plays a critical role in enabling the public to access and engage with our historic environment.

It is our view that meeting these responsibilities should be regarded as a core function of local government. Effective governance of the historic environment at a local level ensures the sustainable management of this finite and irreplaceable resource for present and future generations. Maintaining and enhancing the historic environment can also have a profound impact on the well-being of communities in terms of the physical look and feel of a place. Additionally, the historic environment functions as an increasingly important resource for our tourism and leisure industry. [Scotland's Historic Environment Audit](#) (2018) demonstrates that

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the historic environment generated £4.2 billion for our economy in 2017 alone, supporting 66,000 full-time equivalent jobs.

The [Historic Environment Policy for Scotland](#) (HEPS, 2019) therefore advocates that the allocation of resources should be approached in a way that protects and promotes the historic environment. This will be especially important as local government addresses the challenges identified below.

### **What are the big medium-term (5-year) and longer-term (10+ year) financial challenges for Scottish local authorities?**

Historic buildings and structures make up a significant proportion of our existing infrastructure and places and we know that sustainable, innovative and positive management and investment in our historic environment is becoming increasingly important to communities across Scotland.

Many places in Scotland already suffer from poorly maintained, vacant and at risk buildings and structures. For example, there are over 2000 historic buildings included on the [Buildings at Risk Register for Scotland](#). There are also over 11,000 hectares of derelict and urban vacant land recorded on the [Scottish Vacant and Derelict Land Survey](#) (2018), much of which comprises former industrial, manufacturing and defence sites which include associated historic structures. The Scottish Government's [House Condition Survey](#) (2017) also demonstrates that 68% of all dwellings in Scotland have some degree of disrepair, with 28% of dwellings requiring urgent maintenance. It is well-recognised that the blight and loss of amenity caused by poorly maintained and vacant structures can have a detrimental effect on the well-being of communities, contributing to population decline, health and social problems. A key immediate challenge, therefore, will be to address the already existing conservation deficit affecting both publically owned and privately owned historic assets.

This will be especially important in the context of our changing climate. We understand that the broad trend is towards warmer, wetter winters and hotter, drier summers. Sea levels are already rising at 3-4mm per year, and are speeding up, with the latest climate projections (UKCP18) indicating that the sea level may rise by up to 1m in 2100. Even if global efforts to mitigate climate change are successful, some change is already locked in. These trends are likely to exacerbate existing issues caused by the poor maintenance of our historic buildings and places. While it will be inevitably be financially challenging, it is imperative that local authorities should plan for a range of scenarios and adopt a proactive/preventative approach to maintaining and adapting our existing historic assets.

Our departure from the European Union (EU) is also likely to bring financial challenges for the on-going safe-guarding, upkeep and promotion of our historic environment. We have undertaken [research](#) which demonstrates that EU funding has contributed at least £36.8 million to over 280 projects for our historic environment from 2007-2016. This has been particularly important to rural and island communities where we have seen EU funding to the Highlands & Islands making a dramatic impact to tourism, heritage and culture there. It has allowed award-winning tourism and heritage centres to be built, enhanced interpretation and research of archaeological sites and has provided infrastructure to support the rapid growth of international visitors. It will be important for any replacement funding, such as the UK

Shared Prosperity Fund (UKSPF), to be administered in such a way that reflects local government and community priorities for their historic environment and makes an effective contribution to an already over-stretched arena.

Longer term challenges that are likely to affect local government management of our historic environment include economic and societal changes caused by our transition towards a service and knowledge-based economy, as well as our aging and shifting population. These broad trends are likely to require creative solutions for the adaptation of our historic buildings, infrastructure and places to accommodate new ways of living while retaining their cultural significance and contribution to the well-being and prosperity of local communities. An overview of the challenges affecting the management of our historic environment is provided in the [Historic Environment for Scotland](#) (HEPS, 2019).

### **How effectively are councils addressing these challenges? Do councils currently have all the powers they need to do so?**

The conservation, upkeep and promotion of the historic environment is not included as a statutory function of local government. A lack of priority and resource has therefore been afforded to this objective resulting in the significant challenges highlighted above. It is becoming increasingly pressing for local government to allocate resources in order to sustain the value of our historic environment and the contribution it makes to our well-being and economic prosperity.

There is an overall under-provision of specialist conservation and archaeology staff operating at a local government level. Locally based heritage specialists are necessary to ensure that the historic environment of an area is understood, maintained and safeguarded as part of management decisions. They play a key role in facilitating community engagement with their heritage and can be instrumental in bringing forward projects for the retention and re-use of historic assets. Locally based heritage officers also perform a crucial role in the Scottish planning system, ensuring that planning decisions take into account the impacts and opportunities for new development on locally important historic assets, including those which may not be formally recognised through a heritage designation. This is an essential role that cannot be delivered at a national level.

We also recognise the wider role played by local authority planning departments in the ongoing management and upkeep of our historic environment. This has been brought into focus as part of the recent planning reforms, and we welcome where the planning system has been simplified and strengthened through the Planning (Scotland) Act 2019. We also welcome where communities have been empowered to play a more active role in the identification and management of locally significant buildings and places through the preparation of Local Place Plans. In order to maximise on these opportunities, it will be necessary that planning departments are sufficiently resourced and skilled to deliver development which sustains and enhances our heritage. This is especially the case given recent RTPi [research](#) (April 2019) demonstrating that planning services have suffered most severely of all local government services as a result of budget cuts. We understand that over a quarter of all planning department staff have been cut since 2009.



Similarly, pressures upon local authority planning enforcement officers, in particular, have led to an increase in unauthorised development which negatively affects the quality of our historic environment and also heritage crime including metal theft, vandalism and graffiti.

**What *practical* steps should councils take, and what good practice should councils adopt, to plan for the medium and long-term and to anticipate financial risks? If you are a council answering this question, it would be helpful if you could clarify if you practice medium and long-term financial planning and outline briefly what form this takes.**

It is critical that local government plan for and re-invest in the historic environment in their areas. This will be essential in terms of maintaining the quality of our places as we adapt to our changing climate and in response to longer term societal and economic changes. The historic environment also forms a cornerstone of Scotland's tourism growth and community well-being, with opportunities for preventative spend to reduce costs over the long term and in many cases help to drive opportunities for inclusive and sustainable economic growth.

There are also significant opportunities for communities of place and interest to take on the management and operation of publically owned heritage assets as part of the Community Asset Transfer process under the Community Empowerment (Scotland) Act 2015. In order to maximise on these opportunities, it is therefore essential that Communities are equipped with the appropriate resources and skills, and this will inevitably depend on accessing valuable and practical advice from local government and partner organisations on how to take this forward.

It is our view that these actions will reduce the longer-term financial burdens on local government caused by failing building stock and infrastructure, as well as the health and social problems caused by a decline in the quality of our places.

In support of these objectives, we consider local government should develop long term strategies for the historic assets which form part of their estates. These should include measures for the maintenance, adaptation and future use of historic buildings, structures and places in their ownership as well as opportunities where certain assets could be put to alternative community uses. We have recently published updated guidance on [Asset Management](#) as part of our Managing Change in the Historic Environment guidance note series. This guidance sets out the role of local government in the management of the historic environment and a series of principles that underpin its stewardship. Emerging best practice on this topic is also currently being developed by working groups associated with the delivery of Our Place in Time (OPIT, 2014), the historic environment strategy for Scotland. This includes the publication of supporting information on the potential historic environment impacts of climate change and adaptation measures.

We are also able to provide technical advice on improving energy efficiency in traditional building stock. This will be increasingly important in meeting the Scottish Government's action on climate change and fuel poverty.

As indicated above, we believe there is a need to re-invest in local government historic environment and planning services. Additional resourcing in these areas will allow for the



development of local authority area wide plans and strategies for the retention, upkeep, re-use and enhancement of historic environment assets. It will allow for positive engagement with key asset owners, stakeholders and communities on the value of this resource, and the development of innovative and creative solutions for its future. We also consider that this step will allow for the appropriate scrutiny of development proposals affecting the historic environment and the prevention of harm. An important part of this investment will be to develop knowledge and skills that underpin these activities. Budget should be allowed for local authority staff training and development in the management of our historic environment. Resource and support should also be offered to communities in the care and maintenance of their local historic environment.

**What alternative models of planning for, and delivering, council services (for example, joint working initiatives) could help local authorities make efficiency savings and/or deliver better services?**

We consider that the conservation, upkeep and promotion of the historic environment should be regarded as a core function of local government and that greater corporate priority should be given to this objective. This can not only be achieved by additional investment in local government historic environment services, but also through the prioritisation of place-based approaches across local government service provision. Integrated place-based solutions which recognise the importance of our historic environment and the contribution it can make to meeting wider social and economic objectives can lead to efficiencies across local government.

This type of working has been promoted through the adoption of the [Place Principle](#) by the Scottish Government and COSLA. We also welcome the work undertaken by Community Planning Partnerships in identifying shared community priorities and co-ordinating resources to address them. Use of innovative tools such as the [Place Standard](#) have also furthered this way of working. In order to maximise on this important work, it will be necessary for continued joined-up working across local government departments and increased co-ordination with local government planning services in particular.

It may also be possible address the shortage of local government conservation and archaeology staff through the development of shared historic environment services across local authorities. A notable example of this exists with the [West of Scotland Archaeology Service](#) (WoSAS) which provides archaeology advice across a number of local authorities in the west of Scotland. Shared historic environment services may also allow for a more resilient model of providing historic environment advice – allowing for the creation of mutually supportive teams, the sharing of good practice and ensuring consistency in approaches.

Investment in shared digital platforms for historic environment information, such as local government Historic Environment Records (HERS), would also ensure that important information about our locally important heritage is maintained and used to inform future management decisions

There is also scope for additional partnership working between local authorities and the historic environment sector as a whole. This can be particularly useful on cross-cutting topic such as climate change adaptation. Recent good examples of this include the National

Coastal Change Assessment where over fifty partners, including most local authorities, are working together to take a strategic approach to addressing national coastal change.

We hope that this is helpful. We would be very happy to provide further information or discuss any points raised in this submission. Please feel welcome to contact Alison Baisden on 0131 668 8575 or by e-mail on [alison.baisden@hes.scot](mailto:alison.baisden@hes.scot).

Yours faithfully,

**Historic Environment Scotland**