



**Historic Environment Scotland**

## **DESIGNATIONS STAKEHOLDER ENGAGEMENT**



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# Executive Summary

The Designations Service within Historic Environment Scotland (HES) safeguards Scotland's heritage for future generations by identifying, assessing, and designating sites and places that HES considers are of special architectural or historic interest/national importance.

Between September and November 2024, MainStreet Consulting undertook a stakeholder engagement exercise on behalf of the Designations Service. The purpose of the exercise was to gather feedback and offer practical recommendations on the challenges and opportunities facing designations as a function and system in Scotland.

Several issues and challenges facing the service and the wider system in which it operates were discussed and identified:

- Scale and scope of designations
- Resource constraints
- Strategic realignment across the sector
- Public engagement and expectations
- Societal changes
- Modernising processes and systems

## Approach

The structured engagement included a wide range of stakeholders, including:

- Other HES colleagues
- Local authorities
- Scottish Government
- Other relevant regulators
- NDPBs
- Statutory consultees
- Key agencies
- Heritage professionals
- Developers
- Communities of interest
- Owners of assets across Scotland

Overall, the project team interviewed more than 100 external stakeholders individually or in small groups via MS Teams sessions. Additionally, a workshop was held with 18 Designations staff members to discuss emerging findings and recommendations.

## Key findings

Note that some of the comments received relate to the management implications of designation, rather than the function of designation *per se*. These have been kept in for completeness, and for internal HES Heritage Directorate consideration.

The main themes from the stakeholder engagement were as follows:

- Appreciation that Designations faces significant pressure: through increased demand in volumes and complexity, and from changing customer expectations
- Recognition too that resources – in Designations and across its partners – are increasingly constrained
- Frustrations that there are some outdated or inaccurate records
- Acknowledgment that Designations is often slow at making decisions; its processes need streamlined and its technology updated
- Recognition that there are gaps in the current designations, particularly in relation to post-1840 Victorian and 20th-century structures
- A need for greater clarity and consistency in the application of designations
- Agreement on need for more proactive identification and assessment of threats to heritage assets, especially through climate change implications
- Strong support for HES and Designations to be more proactive, acting more as a leader for heritage management: determining priorities, facilitating collaboration across stakeholder groups in the sector.

## Recommendations

Staff and other stakeholders know there are no panaceas (outside of significantly more resources) but there are interventions and initiatives most stakeholders agree might help:

- Focus on the core Designations remit: saying what Designations ‘won’t do’ as well as ‘what it will’
- Review the guiding principles for designations to improve clarity and consistency
- Inform future activity through proactive thematic research
- Reviewing and updating designations, particularly focusing on the minority of those records with brief or inadequate descriptions and then newer ones
- Seek to minimise ambiguity (e.g. seeking legal clarity on the purpose of the Battlefields inventory; resolving ‘curtilage’ through polygonisation and/or wider legal discussions)

- Use HES ‘convening and advisory’ influence to shape and encourage as much collaboration as is possible; facilitate tighter alignment of national and local agendas
- Employ a ‘less is more’ approach: via shorter assessments, shorter records and reports
- Review how technology, such as AI (and increased use of LiDAR), could be used more to enhance data collection and management (see suggestions in Appendix 4)
- Raise public awareness of the benefits of designations, including through the visibility of good practices and useful case studies
- Inform all of the above with early consideration of what HES and Designations believe constitutes success by, say, 2030.

### Next steps

The Designations Service is expected to review the content and recommendations in this report and prioritise their next steps, feeding into a concurrent, wider strategic planning exercise expected in early 2025.

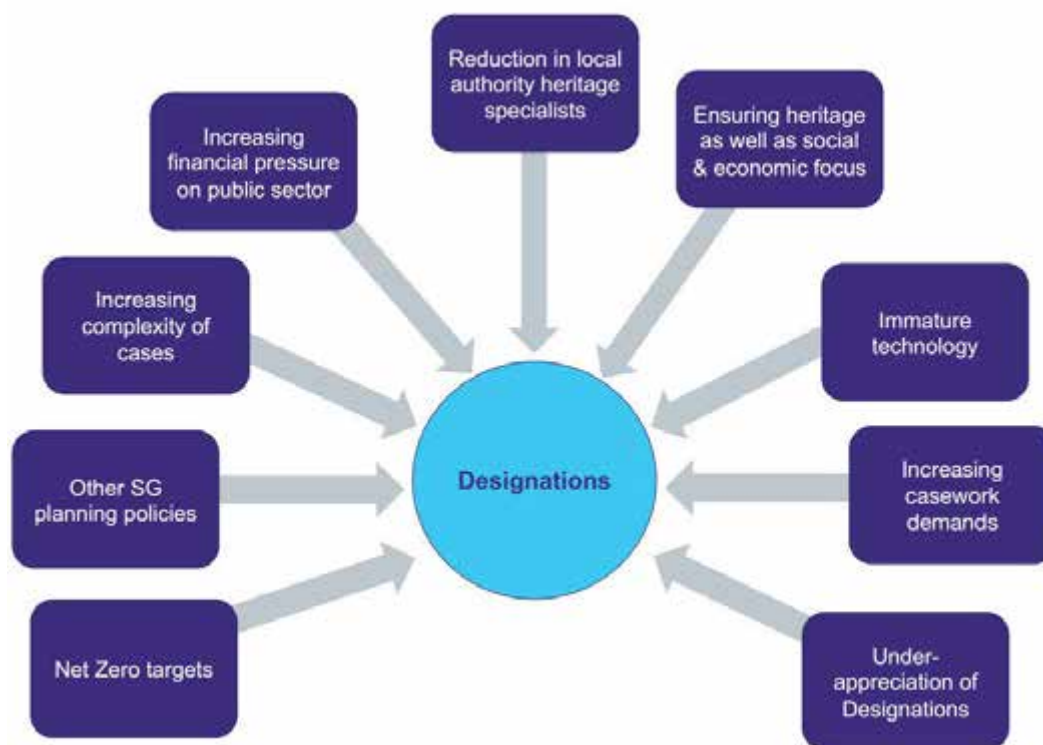
# 1. Introduction & context

The Designations Service and function within Historic Environment Scotland (HES) plays a key role in the protection of Scotland's heritage, ensuring that the nation's most important historical and cultural assets are recognised, protected, and preserved for future generations. It is responsible for identifying, assessing, and designating sites and structures that are deemed to be of special architectural or historic interest/national importance.

In developing this project, initial conversations with senior managers in Designations suggested several issues and challenges facing the service and the wider system in which it operates:

- **Scale and scope of designations:** beginning conversations on the extent and complexity of historic asset management in Scotland i.e. the growing number of listed buildings (47,000), and scheduled monuments (8,000) may require reconsideration of designations processes or selection criteria
- **Resource constraints:** the Designations Service faces resource limitations, impacting its ability to manage the growing workload and maintain the quality of designations records
- **Strategic realignment:** examining the function's 'fitness for purpose' and alignment with the current and future needs of its customers and partners. The project should help to establish a clear mandate and direction for the future of designations, providing clarity and focus for the team and its stakeholders
- **Public engagement and expectations:** a need to understand and begin addressing evolving public expectations on designations, including the transparency, accessibility, and speed of decision-making
- **Societal changes:** consideration of broader societal changes impacting designations such as attitudes towards intervention, costs of insurance, and personal freedoms
- **Modernising processes and systems:** exploring how changes to processes, systems and technology may lead to improved efficiency, effectiveness, and responsiveness within the Designations Service.

In subsequent engagement sessions with stakeholders, the project team used a version of these issues and challenges as an initial prompt for conversations – context to point out that the system as a whole (not solely Designations and HES) is under increasing pressure from several different imperatives, policies, expectations and financial environments. That was summarised in the following diagram.



*Figure 1: Designations Service Pressures*

It is within this context that Designations wants to set out a new strategy in 2025. A key part of this was to understand what their stakeholders think about designations as a function.

## 2. Aim of the review

The aim of this project is to engage with HES and its stakeholders to gather feedback and offer practical recommendations on the challenges and opportunities set out above.

The structured engagement has deliberately included internal HES colleagues, local authorities, the Scottish Government, other relevant regulators, NDPBs, statutory consultees, key agencies, heritage professionals, developers, communities of interest and owners of assets across Scotland.

This project report covers the following:

- the views of stakeholders and service-users on:
  - the current state of the national-level designations
  - impacts of heritage designation in Scotland and how it helps avoid/mitigate any negative impacts
  - the principles, policy and practice of delivering national-level designations
  - priorities for national-level heritage designation.

- evaluation of and advice on strengths, weaknesses, opportunities and threats to the future delivery of national-level heritage designation by HES
- evidence of appetite for fundamental change to designation legislation or other reform of systems or approaches.

The expectation is that these findings and recommendations influence the development of the wider review of Designations and a subsequent strategic plan, due to be drafted in March 2025.

### 3. Approach

The project was undertaken between September and November 2024, following a five-stage approach agreed with a Steering Group of senior Designations staff, as shown in Figure 1:



*Figure 2: Approach to strategic review*

In preparing for the project, and to avoid duplicated effort, MainStreet staff read several documents, strategies and plans germane to the review. These included: the [Designation Policy and Selection Guidance 2019](#); the [advice and support pages](#) of the HES website; [Designations 2020 onwards](#) for current priorities and plans; and the “[How we take decisions on Designations and Casework | Historic Environment Scotland](#)” page of the HES website for governance arrangements.

Of most use were the outputs of detailed analysis of the current state of designations that HES carried out before this project, and the subsequent [\*Towards A Long-Term Strategy for Heritage Designation\*](#) briefing paper. The latter served as a prompt in advance to interviewees, and informed the analysis in this document.

The bulk of the work has been in stakeholder interviews, running from mid-September to early November. Section 4 below sets out that element in more detail.



## 4. Stakeholder engagement

The project team from MainStreet interviewed 55 external stakeholders individually or in small groups via MS Teams sessions, from mid-September to early November 2024. The stakeholder grouping for the study was identified by HES on the basis of detailed knowledge of, and experience with the designations system. This was to ensure that the engagement would provide a high-level of qualitative feedback for consideration by HES.

These stakeholders comprised:

- Local authorities and National Park Authorities via Heads of Planning Scotland (HOPS)
- Scottish Government (CHED, PARD, DPEA, Marine)
- Statutory consultees and key agencies
- Heritage professionals, including planning consultants
- University Estates Directors
- Academics with specific interests in historic assets
- Other relevant regulators
- Other NDPBs including NatureScot, Scottish Canals, Forestry Land Scotland
- Developers including housing developers
- Community groups, heritage groups and development trusts
- One Member of the Scottish Parliament
- Morton Fraser MacRoberts LLP (as HES legal advisors)
- Membership, professional and umbrella organisations such as ALGAO, SURF, RIAS and the Society of Antiquaries of Scotland
- The 20th Century Society, Docomomo Scotland and the Scottish Civic Trust – as heritage campaign organisations.

The project team also engaged with an additional 56 colleagues via a Heads of Planning Officers (HOPS) group facilitated by the Improvement Service on 8<sup>th</sup> November 2024. This meeting comprised a mix of Development Management, Development Planning, Archaeologists and Conservation officer colleagues from 31 planning authorities in Scotland.

The project team believes engagement with these stakeholders provided a comprehensive and representative account of the sector for this stage of the work. These conversations not only provided a broad range of views on designations in Scotland but in-depth engagement too. The project team held mostly detailed and informed discussions, with only a small (less than five) number of these being perfunctory. A majority of interviewees had evidently read the *Towards A Long-Term Strategy for Heritage Designation* paper, and prepared responses or observations on that for the conversations.

Nevertheless, there may yet be gaps (perhaps for example on individual heritage asset owners), as discussed in the later stages of the project. It is recommended that

consideration of the inclusivity of overall consultation is addressed in the subsequent strategic plan work to be undertaken in early 2025.

The list of external stakeholders interviewed or invited to interview (as of 22<sup>nd</sup> November 2024) is at APPENDIX 1.

In addition, five senior managers in Designations were interviewed and 18 staff participated in a workshop on 28<sup>th</sup> October to discuss emerging findings and recommendations.

Note that comments from interviews and workshops were gathered on a (mostly) non-attributable basis. In some instances, this was unavoidable but permission was sought from interviewees to do so.

More detailed commentary is set out in section 5, below.

## 5. Detailed stakeholder views

### 5.1 Summary

In advance of the stakeholder engagement interviews, all participants were sent the *Towards A Long-Term Strategy for Heritage Designation* document. As a result, the majority of those interviewed were familiar with the themes set out via that prompt and certainly with the summary observations on page 3 of that document.

Note however that some of the comments received relate to the management implications of designation, rather than the function of designation per se. These have been kept in for completeness, and for internal HES Heritage Directorate consideration.

Staff in Designations/the wider HES teams should note that most of the interviewees were very complimentary about Designations – feedback on them revealed a group seen as knowledgeable, dedicated, responsive and courteous.

On system issues, there was broad agreement or appreciation that:

- Many potentially eligible sites are not designated, and some designated sites no longer qualify. This may indicate inconsistencies in the scheduling and listing processes or simply capacity
- The current designation system has gaps. It does not account for certain types of cultural landscapes or natural sites with cultural importance
- Designation coverage across Scotland is uneven. Older surveys are outdated, and new comprehensive surveys are difficult to conduct quickly with existing resources
- Many designation records are inadequate. Older records lack detail, making it difficult in some circumstances to understand what is designated and what is important
- Data and information (and their utility as insights) needs modernisation. Current data may not meet industry standards, hindering effective search, analysis, and research.

Page 4 of *Towards A Long-Term Strategy for Heritage Designation* asks a series of questions on ‘What we want to learn’ about the designations system in Scotland. In general, there was less certainty in the responses from stakeholders on those elements. A summary for those would be:

- No enthusiasm for significant legislative change, with most informed stakeholders saying that making the case would involve too much time and effort in an environment where parliamentary and civil service time might not be available in the short to medium terms
- But acknowledgement that the system overall requires change, given (likely) reductions in formal resources and rising demand in volumes and complexity of cases
- Designations is mostly protecting the right things in the right places at the moment, but there is widespread expectation that priorities and expectations are changing: HES and the Designations Service should be leading the conversation about those changes
- Few stakeholders had views on whether or not HES is using the right type of designations: commentary was more focused on how these are applied and the data underpinning them. Interviewees suggest that resources should be deployed – from across the sector, not solely by Designations – to make data more reliable, up to date and accessible
- How Designations prioritises its resources varies based on the stakeholder groups concerned. However, prioritising new listings was considered crucial by a majority of (but not all) interviewees. This is motivated by a concern that there are heritage assets of ‘listable quality’ (stakeholder’s phrasing) being ignored, and some examples (e.g. the lead mine engine room and cottages at Mulreesh), were given where there have been losses as a consequence
- Additionally, some colleagues referenced the 25% of scheduled monument records with only brief descriptions, and the 32% with no statement of national importance as needing addressed. Some other colleagues went further, suggesting that attention is paid to the estimated 16% of listed building records with possibly inadequate descriptions
- Advice more generally included a desire to “remove ambiguity” from the system, ranging from comments about getting the “purpose of the Battlefields inventory defined in law”, working cross-sector to navigate multiple policy imperatives
- Long-term changes should be informed by thematic reviews, more cross-sector collaboration on determining and delivering priorities (including through the active involvement of third parties in updating records) and through developments in technology especially Artificial Intelligence (AI) tools.

## 5.2 The current state of the national-level designations

The main themes raised by stakeholders on national-level designations are set out below:

- **Lack of resources:** as with most of the commentary, there is acknowledgement across most stakeholder groups that HES/Designations would benefit from additional resources but recognition that the current public sector financial environment makes that very unlikely. The corollary is that effectively managing designations as currently constituted will be very difficult
- **NB:** there are interviewees who make the point that they and their organisations want more designations done, and a case made for more people working on designations, and more focus on the nation's heritage assets generally
- **Breadth and depth of expertise:** several interviewees, and especially at local authorities, asked if HES/Designations can realistically be expected to have depth and breadth of expertise in multiple areas, sectors geographies and interests?
- **Outdated records and processes:** the majority of interviewees made unprompted points about records (especially for scheduled monuments) being outdated, noting further that this hinders efficient decision-making not only for HES but for other interested parties. In some cases, there is enthusiasm from the heritage campaign organisations and other professionals to assist with that challenge through 'crowd-editing' or 'crowd-describing'
- **Inconsistency:** conflicting listing descriptions and criteria have created confusion and some frustration for some interested parties. Much of this appears to be due to sites designated historically but which would not adhere to current criteria
- **Lack of clarity:** selection process and guidance for national designations are seen by some groups - notably the heritage campaign organisations - as unclear. While some of this is due to language (with two requests for more Plain English usage), more was due to emerging debates about the merits of architectural, cultural and social historic assets (one example cited was Barnhill, the Jura home of George Orwell)
- **Gaps in listings:** Several interviewees suggested there are thematic gaps, especially on post-1840 Victorian & 20th Century structures (as well as possible emerging themes around Scotland's post-1960s energy industries)
- **Over-emphasis on architectural value:** there is a perception among some academic stakeholders that, for HES, architectural value outweighs historic value (see Barnhill example above)
- **Inadequate prioritisation:** local authority colleagues in particular said that work is needed to address a "disconnect between national and local priorities"

- **Reactive approach to listing:** the heritage campaign organisations and some others are keen that development proposals are not used as tools to prevent listing; that is, HES and Designations should be alive to and “not cowed by” these perceived tactics. Cumbernauld Town Centre was given as an example where this policy led to a meritorious building being excluded from a listing
- **Non-statutory protection:** many interviewees across the sector expressed frustrations that there are few, adequate penalties for damaging/destroying non-statutory features
- **Lack of proactive threat identification:** a widespread view that the system as a whole (including local authorities) needs more proactive identification and assessment of threats to heritage assets, especially through climate change implications (flooding, erosion etc)
- **Gardens & Designed Landscapes (GDL) issues:** two interviewees (independently) referenced the absence of second level significance for GDLs and the related voluntary nature of local authority lists of non-inventory sites.
- They also raised the limited archaeological information being available for GDLs
- Specifically, Scottish Canals noted **possible changes to Dual Designations** – where some assets like bridges are both listed and scheduled monuments. They would be keen to be involved in future discussions about those proposals, particularly around how national organisations might accommodate that.

### 5.3 The impacts of heritage designation in Scotland

The project team prompted interviewees on the impacts of heritage designations, asking for both positive aspects and areas for development. Feedback on benefits included:

- **Preservation:** most consultees did believe that the current system helps to ensure (but doesn’t ensure on its own) the conservation of important historical and cultural sites, buildings and (a select number) of battlefields and GDLs for future generations
- **Economic benefits:** several stakeholders (notably in local authorities, the Universities and the heritage campaign groups) said that designated sites attract tourists, boosting local economies and create jobs in tourism and hospitality. All did say that the system, led by HES, should do more to publicise those benefits given the need for economic growth espoused by both Scottish and UK governments
- **Community identity:** the Heritage campaign groups and Paul Sweeney MSP were keen to stress that designation fosters a sense of pride and connection to local

history and culture, aiding community identity and cohesion. Scottish Canals referenced the Claypits in Glasgow, transformed from a derelict site in the early 2000s into a nature preserve and valued community asset

- **Environmental benefits:** Protecting historic landscapes often contributes to preserving biodiversity and natural heritage.

Colleagues across the sector did point out some areas for development:

- **Limited public understanding:** there were several comments made across most stakeholder groups about the limited and inconsistent public understanding of the designations process and its benefits – and the corresponding need for better communication with communities to convey the purpose and value-add of designations as a function and, indeed the Designations service itself
- **Publicising good practices:** as such, some stakeholders thought that Designations should increase the visibility of good practices and useful case studies. These might include, as from stakeholder commentary, things where a designation may help directly or indirectly e.g.:
  - On climate change, which came up several times:
    - Structural reinforcement: Strengthening buildings and sites to withstand floods, or storms
    - Protective barriers: Constructing flood walls or barriers to divert water or debris flows
    - Relocation: Moving artifacts or structures to a safer location.
  - For human-induced threats:
    - Security measures: Implementing surveillance systems, access controls, and guards to prevent theft or vandalism
    - Environmental controls: Maintaining stable temperature and humidity levels to prevent deterioration of artifacts
    - Sustainable tourism: Managing tourism to mitigate negative impacts on heritage sites
    - Encouraging developer responsibility: Encourage developers to take on more responsibility for ensuring listings are updated.
  - For long-term threats:
    - Preventative conservation: working with local authorities in inspecting, cleaning, and maintaining heritage assets to prevent deterioration
    - Community engagement: Educating and involving local communities in heritage protection efforts.

## 5.4 The principles, policy and practice of delivering national-level designations

The project team prompted all interviewees on guiding principles and practice, with varying levels of feedback on each. The main themes were:

- **Recognition of a complicated policy terrain:** there is widespread agreement on legislative and policy challenges for Designations. Several stakeholders pointed to perceived competing pressures, for example:
  - the University Estates directors all cited how Net Zero imperatives may run counter to consents for replacement windows in Category A buildings
  - Developers mentioned consideration of Construction (Design and Management) Regulations 2015, Health & Safety directives, DDA compliance in heritage contexts
- The point was mainly that the key players in the designations system need **help to navigate the legislative environment** better, and HES/Designations may have to play a lead role. That is, seeking enhanced clarity on how partners can in practice align local, regional and national developments to achieve sustainable economic growth while addressing Net Zero aspirations. Certainly, many colleagues noted that Climate Change pressures are growing in a heritage context – and that more advice or cross-sector consideration of these challenges is needed. Asset adaptation will require physical interventions
- Some stakeholders, particularly those from the Heritage campaign groups, said that some of the **principles in HEPS may need reviewed** in the short-term. Those included specific references to the implications of “the historic environment changes over time, and so does how it is understood and appreciated” (how is that updated, by whom, when?) and “everyone has a stake in the historic environment and how it is looked after” (with implications for a stakeholder management strategy/plan)
- There were some comments made about determining clearer, more consistent criteria for designations, along with improved communications and guidance. As noted above, some of that included requests for Plain English usage
- A handful of interviewees, including one local authority stakeholder, suggested that HES/Designations spends time **redefining “national importance”** – this appears from comments to be about how Designations determines and explains national importance in its guidance
- Interviewees did offer commentary on **guiding principles** for a future Designations. These included repeated references to:
  - shared determination of priorities
  - clarity/removal of ambiguity (including via more concise descriptions)
  - common understanding and language for terms such as ‘significance’ ‘national importance’
  - enhanced, HES-led, collaboration across the sector



- use of early intervention and prevention techniques (e.g. more pre-application consultation work, Section 17 agreements etc)
- a focus on impact (that is, development of mechanisms to monitor and evaluate the impact of heritage designation, including social, economic, and environmental outcomes)
- advocacy and promotion of the benefits of heritage designation to the public
- exploration of innovative technology and data approaches.

## 5.5 Priorities for national-level heritage designation

The project team prompted interviewees on priorities for Designations. The main feedback was:

- Views on how best Designations prioritises and deploys its resources varied according to the interests of the stakeholder groups, but prioritising new listings was considered crucial by a majority of (but not all) interviewees. This is motivated by a concern already noted in *Towards A Long-Term Strategy for Heritage Designation* that there are heritage assets of listable quality being ignored
- In addition, there was some commentary from stakeholders that addressing the 25% of scheduled monument records which only have brief descriptions, and the 32% that have no statement of national importance would be beneficial. One key stakeholder said this would be “the minimum expectation” of Designations in the short-term
- Designations should also be putting a ‘header’ in every record to explain its purpose
- A few stakeholders, while talking about improving communication, said that they believed HES needs to be clearer on why it schedules cropmarks and their value to the nation, and its communities
- Several interviewees also suggested that HES could stop listing buildings at Category C that are deemed representative, perhaps even reviewing/delisting Cs of that type, with minimal pushback from the wider sector
- For the most part, external stakeholder colleagues agreed that “less is more”; that is, that use of more concise and impactful descriptions of listed or scheduled assets would not only help with workload challenges but improve clarity and accessibility for stakeholders and partners. An example was given of the Livingston Skatepark listing, which has 3800 words in the entry. (NB: this was not a consistent view: some interviewees are still keen that HES/Designations provides more detail)
- Advice more generally included a desire to “remove ambiguity” from the system, ranging from comments about getting “the purpose of the Battlefields inventory” defined in law, working cross-sector to navigate multiple policy imperatives (that is, driving clarity on how partners can in practice align local, regional and national

developments to achieve sustainable economic growth while addressing climate change and promoting wellbeing: see NPF4)

- There is a desire for more dialogue with the local planning authorities on shared practice and shared information: that is, the local planning authorities and HES will have different lists (e.g. on Battlefields) and this is seen as unhelpful
- Among several comments about priorities, stakeholder interviewees mentioned a need for more focus on national priorities and HES strategic objectives (“a focus on the core remit”, echoed later in the late October staff workshop), to be delivered via improved collaboration across the whole system.

## 5.6 Other feedback themes

Over the course of 50+ interviews, several other themes or consistent feedback was captured. The most significant of those are set out below:

- Several interviewees, including all of the heritage campaign groups and the academic consultees, referenced the possibility of enhanced system collaboration: mainly in exploring ways of working to help address data gathering or data completeness challenges across Scotland. Unprompted, several use the phrases “crowd-editing” or “crowd-describing” approaches
- Many also expressed the view that HES should be the clear “leader and problem solver” for the designations system. That included suggestions that HES be more proactive and “braver” in heritage management - providing not only guidance and support but also direction, “acting as a convener” for the sector in Scotland
- Some key stakeholders also suggested that HES as a whole should be performing a stronger regulatory role in ensuring designations result in protected assets
- A few references were made to more learning from and sharing with others. The perception by some is that HES is reluctant to use e.g. Historic England guidance, research, and protocols (and possibly *vice versa*) even when the challenges and opportunity are translatable
- There were also comments made, across most stakeholder groups, about technological innovations. There is certainly an expectation that Designations will over the course of its next strategic plan be exploring and embracing e.g. drones, AI and enhanced Business Intelligence (BI) to improve data collection, analysis, and decision-making. It should be noted too that there is existing HES capability in AI and BI, via the Heritage Information Business Services (HIBS) team. (See Appendix 4 for some suggestions/examples on how that might work).

## 5.7 Internal Designations workshop

The project team facilitated a workshop with Designations staff on 28th October, at which an outline presentation of feedback to date was provided. Staff were invited subsequently to discuss their responses to the issues, challenges and risks set out in that presentation and their critiques of emerging suggestions for change from that feedback. These discussions have helped to shape this report and contributed to wider internal engagement undertaken by HES.

## 5.8 Meeting with Heads of Planning Officers group (HOPS)

Through a Heads of Planning Officers group facilitated by the Improvement Service on 8<sup>th</sup> November 2024, the project team and Dara Parsons from Designations met with a mix of Development Management, Development Planning, Archaeologists and Conservation officer colleagues from 31 planning authorities in Scotland.

A summary of the issues raised and general feedback is set out below:

- Support for HES: Despite some frustrations and areas for development, there is widespread support for Designations (and the wider HES) in leading the sector, setting priorities, and looking at risks, losses, and trends
- There are concerns about workload: HOPS colleagues stated worries that this exercise would be a way to pass on work to local authorities (LAs)
- The continuing lack of conservation officers in planning departments is a concern
- Colleagues mentioned a perceived lack of support for urban archaeology in current systems
- Frustrations with Designations processes: seen by some partners as slow (e.g. one instance taking two years in Shetland)
- Problem of outdated information on designations: views that many designations are based on old information, which can be biased and inaccurate
- 'No objection' and national importance: The implication that sites not designated by HES are less important is an issue, with developers sometimes misusing this
- Development proposals should not be a barrier to listing
- The impact of changes to permitted development rights (PDR) on windows: this is seen as a significant setback for good conservation practice
- Concerns were raised about the poor (national) recognition of sites with non-statutory protections and the weakness of Garden and Designed Landscape (GDL) protections, especially for horticultural assets

- Challenge of non-designated assets: justifying action to protect these assets can be difficult, especially with limited information in the Historic Environment Record (HER)
- Limited nature of “Historic Environment Policy” resource in the Scottish Government has led to a lack of clarity and support in some areas
- The lack of clarity around 'curtilage' needs to be addressed, possibly through polygonisation of listings and wider legal discussions
- Some HOPS colleagues suggested there are problems with battlefield designations; the broad nature of which can lead to opposition to development even in less important areas
- Need for a more nuanced approach to mitigation: The current 'yes or no' approach to mitigation for scheduled monuments is seen as contrasting with the more nuanced approach used for battlefields
- Value of HES resources: The ability to add photos to listings and access the HES photographic archive is highly valued
- There is perhaps an issue (to be investigated) around Statements of Significance and HES 'signing up' to the Burra charter (a framework for managing places of cultural significance)
- Importance of an informal communication channel between LAs and Designations: ability to communicate with HES about cases needing a fuller response is seen as invaluable
- Need for community involvement: Local communities should be encouraged to undertake small-scale evaluations of their heritage
- One of the participants noted the digital learning from recent Scottish Government work: a request to find ways to share and incorporate data held by LAs are important.

HOPS colleagues at the session were asked explicitly if there was an appetite for fundamental change to designation legislation or other reform of systems or approaches. The prevailing commentary was similar to that of most other stakeholders throughout this exercise:

- There is little enthusiasm for significant legislative change, based on a 'realism' around the time and effort required in an environment where government, civil service and public support is unlikely in the short to medium terms
- But there is agreement that the system overall needs changes, given what are expected to be static or reduced formal HES resources in the short to medium terms,

*and* a concurrent rising demand in volumes and complexity of cases. The feedback above helps inform that and will focus largely on driving clarity, collaboratively determining priorities across the system and facilitating speedier decisions.

## 6. SWOT analysis

The project team undertook a SWOT (Strengths, Weaknesses, Opportunities & Threats) analysis for Designations, informed by the existing documentation and the stakeholder feedback above.

A summary of that exercise is shown in the following table:

Table 2: Designations SWOT analysis

SWOT	Commentary
<b>Strengths</b>	<ul style="list-style-type: none"> <li>• <b>A respected team:</b> vast majority of the stakeholder interviewees cite good relationships with Designations – who are seen as responsive, helpful, knowledgeable</li> <li>• <b>Deep expertise:</b> the team possesses significant expertise in heritage designation and management. This is consistently acknowledged by stakeholders, even while concerns are raised about application and consistency</li> <li>• <b>Statutory authority:</b> HES's statutory role provides a strong foundation for its work, though concerns exist about overly cautious or reactive application of this authority.</li> <li>• <b>System leader:</b> HES widely recognised by most stakeholders as the key player in protection and promotion of historic assets in Scotland</li> <li>• <b>National list:</b> The existence of a national list is a significant strength, (although the quality, completeness, and currency are sources of frustration)</li> <li>• <b>Digital Resources:</b> HES utilises and offers digital tools and resources (Canmore, Past Map etc.) which are viewed positively by many external stakeholders (though integration and accessibility of systems could be improved).</li> </ul>
<b>Weaknesses</b>	<ul style="list-style-type: none"> <li>• <b>Definition of success:</b> several stakeholders, including some internally, state that HES/Designations needs to determine what success is in the latter part of the 2020s</li> <li>• <b>Resource constraints:</b> A persistent theme across interviews and supporting documentation is insufficient resources. This is increasingly leading to reactive, rather than proactive work, and inconsistent application of designations.</li> <li>• <b>Immature processes:</b> internal Designations staff acknowledge that activity, and especially decisions, take too long to process</li> <li>• <b>Immature technology:</b> acceptance that underpinning technology is outdated/needs reviewed</li> <li>• <b>Communication &amp; transparency:</b> There are concerns about HES's communication and transparency. Information is not always readily accessible or clear, leading to misunderstandings. The process itself is not well understood.</li> <li>• <b>Inconsistent application:</b> The application of designations is seen as inconsistent across different periods, building types, and</li> </ul>

	<p>geographical areas. The existing national list is not equally representative across themes and needs updating.</p> <ul style="list-style-type: none"> <li>• <b>Lack of proactive engagement:</b> HES is often viewed as reactive rather than proactive in engaging with stakeholders (local authorities, developers, the public). This leads to frustration from various stakeholders.</li> </ul>
<b>Opportunities</b>	<ul style="list-style-type: none"> <li>• <b>Support for Designations:</b> stakeholder interviews suggest that Designations can benefit from goodwill across the system: there is respect for the team and an appreciation of the challenges faced</li> <li>• <b>Improved collaboration:</b> A major opportunity lies in improving collaboration between HES, local authorities, developers, and community groups. Sharing information and resources, and adopting a more joined-up approach, could greatly improve efficiency and effectiveness.</li> <li>• <b>Modernising processes &amp; systems:</b> Modernising processes, and technology offers significant opportunity to improve efficiency, transparency, and public engagement. Digitalisation of forms, AI, data mining, and more user-friendly online platforms are frequently mentioned.</li> <li>• <b>Strategic focus &amp; prioritisation:</b> Establishing a clear strategic focus and prioritising key areas would allow HES to optimise resource allocation. Adopting a thematic approach to designation is suggested by several contributors.</li> <li>• <b>Targeted training &amp; development:</b> Training and development for external stakeholders is an opportunity to enhance understanding of the designations system and improve collaboration.</li> </ul>
<b>Threats</b>	<ul style="list-style-type: none"> <li>• <b>Resource cuts:</b> Continued or increased resource cuts pose a significant threat to HES's ability to fulfil its statutory responsibilities effectively. This is a concern frequently raised by multiple stakeholders.</li> <li>• <b>Changing expectations:</b> customer preferences on access to data, speed of decision-making</li> <li>• <b>Legislative changes:</b> Changes in legislation (e.g., relating to development or climate change) could necessitate significant adjustments to the designations process, possibly requiring more resources.</li> <li>• <b>Negative public perception:</b> The perceived lack of transparency, proactive engagement, and inconsistencies in application threaten to erode public trust and confidence in the HES designations system.</li> <li>• <b>Climate change &amp; decay:</b> The effects of climate change and natural decay present threats to designated assets, requiring proactive conservation strategies.</li> </ul>

Source: Stakeholders with MainStreet analysis

## 7 Recommendations

The work undertaken for the strategic review has led to several areas in which we know that there is broad stakeholder support and so we have included these as recommendations, which we think HES should consider in detail as it develops its long-term strategy for designations.

They are shown in the following table.

Table 3: Recommendations

No.	Recommendation	Key actions
1	<b>Resource allocation</b>	Accept the scale of the challenge. Agree and set out what the Designations Service will/should and could do and what it will not/should not and cannot do. Review how technology could be used to free resources. Consider adopting a 'less is more' approach. Set up a short life working group to decide how Designations could be more concise in subsequent record creation and management ('a less is more' drive).
2	<b>Encourage a stronger focus on the core Designations remit</b>	(Given resource constraints) adopt disciplined concentration on what statutory and legislative obligations imply for the Designations. More explicitly say what Designation 'doesn't do' as well as 'what it does'
3	<b>Exploit HES and Designations' 'convening and advisory' influence</b>	Explore possibilities for more cross-sector system forums to shape and encourage as much collaboration as is possible; facilitate tighter alignment of national and local agendas
4	<b>Review guiding principles</b>	Review designations guiding principles through identification of areas of guidance, policies (and possibly legislation) that could be improved to remove ambiguity, improve consistency, clarify (e.g. curtilage), and more accurately define descriptions (e.g. national importance, significance) and some purposes (e.g. Battlefields inventory). Work cross-sector to navigate multiple policy imperatives. Agree areas in which HES will publish additional guidance to help lead the sector. Assess the development barrier to listing. Agree a renewed approach to enforcement. Identify the leadership role that the Designations Service should undertake in the sector and how this will work in conjunction with partners. See 7.
5	<b>Consider designation gaps</b>	Review the designation gaps (thematic and geographical) and work with stakeholders



		(particularly local authorities) to understand where the priorities gaps are and how best to fill them. Working cross-sectorally to address how best to protect non-designated assets locally.
<b>6</b>	<b>Updating (some) existing listings</b>	Review and update designations focusing on the 25% of scheduled monument records with only brief descriptions; the 32% with no statement of national importance as needing addressed; the estimated 16% of listed building records with possibly inadequate descriptions. Consider options (including from third parties) for updating existing listings, such as disclaimers or a Wikipedia-style platform for community 'crowd-describing' contributions. Consider practicality of adding headers that state why the listing is in place. Explore the concept of a "shelf-life" for designations, recognising that significance can change over time.
<b>7</b>	<b>Anticipate future designation characteristics and requirements</b>	Develop ideas on what the designations system might look like in the future, perhaps using a technique like scenario planning, as well as thematic reviews, and identify actions that might be required now to help achieve the future state. See 4.
<b>8</b>	<b>Identify and assess threats</b>	Work with partners across the sector to undertake a threat assessment and prepare a response to most at risk listed sites.  While some of this relates to pre-designation (via thematic reviews), some of this applies more for ongoing management of sites, and therefore for the wider Heritage Directorate to consider
<b>9</b>	<b>Addressing emerging heritage</b>	Develop a framework for assessing and designating emerging heritage, such as 1970s and 1980s buildings and structures related to the oil and coal industries.
<b>10</b>	<b>Review technology use</b>	Review how technology, such as AI and LiDAR, could be used to enhance data collection and management. Investigate automation opportunities within Designations Service. Explore and invest in technology and systems that support the efficiency and speed challenges, using internal HIBS team and potential partners. Find ways to share and incorporate data held by local authorities.
<b>11</b>	<b>Raise public awareness</b>	Determine the best way to undertake public engagement to raise the profile of designations and set out its contribution and benefits across Scotland. Encourage local communities to undertake small-scale evaluations of their heritage. See 7.

<b>12</b>	<b>Publicising good practices</b>	Increase the visibility of good practices and useful case studies, such as successful development models that preserve heritage.
<b>13</b>	<b>Increasing public engagement on GDLs</b>	Increase public engagement and provide more planning advice notes related to GDLs. Consider second level for GDLs.
<b>14</b>	<b>Agree internally what success looks like for Designations Team</b>	Explore collaboratively with partners across the system and define priorities into success/KPI framework. See 1, 7, 8, 9 and 12

*Source: Stakeholder comments and MainStreet analysis*

## 8 Next steps

The Designations Service should review the content and recommendations in this report and prioritise their next steps.

The expectation is that these findings and recommendations influence the development of the wider review of Designations and a subsequent strategic plan, due to be drafted in March 2025.

# Appendix 1 – External stakeholders interviewed

Overall, the project team interviewed more than 100 external stakeholders individually or in small groups via MS Teams sessions. The organisations represented are set out below: in some instances, more than one member of staff attended meetings or participated in e.g. the Heads of Planning workshop.

- Aberdeen City Heritage Trust
- ALGAO Scotland
- Forestry & Land Scotland
- Scottish Government (Marine Conservation, Marine Directorate)
- Perth & Kinross Heritage Trust
- University of Glasgow
- University of Strathclyde
- Morton Fraser MacRoberts LLP
- Wessex Archaeology
- NatureScot
- University of Edinburgh
- The Heritage Society
- Scottish Government Planning, Architecture and Regeneration Division (PARD)
- SURF - Scotland's Regeneration Forum
- Built Environment Forum for Scotland (BEFS).
- Turley
- 20th Century Society
- Montagu Evans
- Society of Antiquities of Scotland
- Guidelines
- Royal Incorporation of Architects in Scotland (RIAS)
- Member of the Scottish Parliament
- University of Strathclyde
- Homes for Scotland

- Barratt Homes
- Taylor Wimpey
- Scottish Civic Trust
- Improvement Service
- Scottish Canals
- The Architectural Heritage Society of Scotland (AHSS)
- Conservation Officers Group (COG)
- Docomomo Scotland
- Scotland's Gardens and Landscape Heritage (SGLH)
- Chief Reporter, Planning and Environmental Appeals Division (DPEA), Scottish Government
- Stirling University
- Guidelines
- AOC Archaeology
- Scottish Government
- Scottish Government Culture and Historic Environment Division (CHED)
- City of Edinburgh (via HOPS meeting)
- Stirling Council (via HOPS meeting)
- Aberdeenshire Council (via HOPS meeting)
- Western Isles Council (via HOPS meeting)
- Aberdeen City Council (via HOPS meeting)
- Angus Council (via HOPS meeting)
- Argyll And Bute Council (via HOPS meeting)
- Cairngorms PA (via HOPS meeting)
- Clydeplan (via HOPS meeting)
- Dumfries And Galloway Council (via HOPS meeting)
- Dundee City Council (via HOPS meeting)
- East Ayrshire Council (via HOPS meeting)
- East Dunbarton Council (via HOPS meeting)
- East Lothian Council (via HOPS meeting)

- East Renfrewshire Council (via HOPS meeting)
- City of Edinburgh Council (via HOPS meeting)
- Falkirk Council (via HOPS meeting)
- Fife Council (via HOPS meeting)
- Glasgow City Council (via HOPS meeting)
- Highland Council (via HOPS meeting)
- Inverclyde Council (via HOPS meeting)
- Loch Lomond And The Trossachs PA (via HOPS meeting)
- Midlothian Council (via HOPS meeting)
- North Ayrshire Council (via HOPS meeting)
- North Lanarkshire Council (via HOPS meeting)
- Orkney Islands Council (via HOPS meeting)
- Perth And Kinross Council (via HOPS meeting)
- Renfrewshire Council (via HOPS meeting)
- Scottish Borders Council (via HOPS meeting)
- South Ayrshire Council (via HOPS meeting)
- South Lanarkshire Council (via HOPS meeting)
- Stirling Council (via HOPS meeting)
- West Dunbartonshire Council (via HOPS meeting)
- Western Isles Council (via HOPS meeting).

Note that the following were invited to participate but no interviews took place.

- ADS (Architecture and Design Scotland)
- Community Land Scotland
- Nautical Archaeology Society
- NFUS (National Farmers Union Scotland)
- NTS (National Trust for Scotland)
- NHS Estates
- PAS (Planning Aid Scotland)

- Peter Drummond Architects
- RTPi (Royal Town Planning Institute Scotland)
- Ryden
- Scottish Battlefields Trust
- Scottish Futures Trust
- Scottish Land & Estates
- Simpson and Brown Architects
- Scottish Property Federation
- Two academics (as subject matter experts).

## Appendix 2 – Examples of designations cited

### a. Used to illustrate issues with designations or processes:

- **The ABC cinema in Glasgow:** Discussed in relation to the use of emergency public safety powers to demolish listed buildings.
- **Marks & Spencer building on Sauchiehall Street, Glasgow:** Highlighted for a good outcome resulting from a designation review.
- **Elder Park Cottage:** Used as an example of a listed asset on vacant land where de-listing might be beneficial to unlock development potential.
- **Govan Housing Association's flats:** Cited to illustrate cost implications related to having to use traditional materials (e.g. wooden sash and case windows) for repairs and replacement on listed buildings.
- **Cumbernauld Town Centre:** Given as an example of a place where the policy of not designating in the face of development has resulted in meritorious buildings being excluded from listing.
- **Footdee:** Mentioned specifically in relation to delisting buildings where there is a group listing that pre-dates conservation areas.
- **The City Sawmills, Glasgow:** Mentioned as an example of the time delays involved in designation processes.
- **Inchindown Underground Fuel Reservoir (LB52317):** A building that raises the question of why it was listed rather than scheduled.
- **Glasgow School of Art:** Used to highlight that Scotland should take pride in its architectural legacy and needs HES to provide proactive leadership to help protection.
- **Gilcomstoun Land, Seamount Court, Porthill Court, Marischal Court, and Virginia Court multi-storey tower blocks in in Aberdeen:** These were referenced multiple times, highlighting concerns around the application of listing criteria to more modern buildings, particularly social housing. Also issue of increased burden on communities; however can also foster local identity and provide economic impact.
- **Isle of Mull telephone box** Cat B because in film 'I know where I'm going'; however, Barnhill, where Orwell stayed on Jura - rejected twice for listing. Raised because of the inconsistency between the two examples, particularly the approach to



the 'historic' criterion. Barnhill also raised in the context of the need for open-minded reappraisal in the system

- **Mulreesh on Islay** was a lead mine engine room and house. Was demolished because unlisted. Should have been Cat A. Example of cultural loss.
- **Livingston Skatepark** was listed in 2024 (included in the HES paper sent out to stakeholders) but one stakeholder challenged this being a listing priority? Is it at risk? Uncontroversial? Skatepark has 3800 words in the entry. Why is that necessary?
- **Gaps in listing such as landscapes associated with infrastructure** such as M90 between Kinross and Perth, modern landscapes of the coal industry such as the A frame head structure at Barony, Ayrshire, or GDL at the Aviva Building in Perth
- **Murthly Castle** – an example of a listing that has not been updated in over 40 years
- **Rosyth Garden City and McLane buildings in Edinburgh** – examples that should be conservation areas
- **Pinkston Basin, Glasgow** – a derelict site 14 years ago but now a paddle sports centre but designation has not kept up with change in use.

#### **b. Used to illustrate broader points about heritage:**

- **Scapa Flow:** This is used to highlight difficulties in SG's consultation regarding wreck designations
- **Kingston Bridge:** Discussed to highlight concerns about the lowering of listing thresholds.
- **The Comet (shipwreck):** Used as an example to highlight the differences between HMPAs and SM designations in marine contexts. HES designated it as a SM as HMPAs take too long to achieve and leave the site unprotected in the meantime
- **Various structures at East Fortune Airfield (East Lothian), and Torr Righ Mor (Arran):** used as examples of where large scale de facto landscape designations exist. Stakeholder believed that a discussion paper on this theme would be very useful
- **Cairnerzean Hill (Galloway):** This highlights the resource implications of multiple schedulings on the same area with an impact on land use and local economy.

- **Wheeler & Sproson houses in Dysart, Kinghorn and Burntisland** - sometimes conservation areas boundaries set to exclude some C20 buildings with these important social housing areas good examples. HES guidance would be helpful and provide opportunity to tidy up Burntisland and Kinghorn conservation area boundaries.
- **Ardoch Roman Fort** - Is there a case for state intervention, where something is of national importance and needs maintenance to protect it
- **Boswall in Edinburgh** should be conservation areas but that is CEC issue. Class issues? HES could intervene but doesn't do so as don't want to be seen to be top down?

#### c. Used to highlight positive examples:

- **Charles Jencks Landscape:** Praised as an example of HES proactive approach to designation
- **Several leisure centres:** Mentioned in relation to successful collaboration between HES and the Twentieth Century Society.
- **Aberdeen tower blocks:** Highlighted as a success story in engaging with the community and achieving positive listings.

## Appendix 4 – AI & predictive modelling

As use of AI was raised by many respondents, we have given thought to what some key applications might include:

### 1. Automating identification of potential historic assets

- Image recognition and classification: AI algorithms can analyse vast quantities of visual data (e.g., aerial imagery, street-view photos, historic maps) to identify buildings and landscapes with potentially significant architectural or historical features. This can help prioritise sites for further investigation by HES/Designations experts.
- Predictive modelling based on existing HES data: By analysing data from existing designated sites (age, architectural style, historical significance, etc.), models can predict the likelihood of other, undesignated sites having similar heritage value. This can be particularly useful in identifying overlooked assets.

### 2. Streamlining the assessment process

- Automated report generation: AI can analyse data from various sources (historical documents, architectural plans, archaeological findings) to generate preliminary assessment reports, saving experts time and resources.
- Predicting risk factors: By analysing environmental data (pollution levels, climate change projections, etc.), AI can predict the risk of future damage to potential heritage assets, aiding in prioritisation and proactive conservation efforts.

### 3. Enhancing public engagement

- Interactive maps and virtual tours: AI can power interactive platforms that allow the public to explore potential heritage sites virtually, fostering greater awareness and community involvement in the designation process.
- Sentiment analysis: AI can analyse public feedback (social media comments, online surveys) to gauge community support for designating specific assets, providing valuable input to decision-makers.

### 4. Ensuring objectivity and consistency

- Reducing bias: AI can help minimise subjective biases in the assessment process by relying on data-driven analysis and predefined criteria from HES.

- Standardising evaluation: Predictive models can ensure consistency in evaluating potential heritage assets across the different regions of Scotland and time periods.

#### 5. **Examples:**

- Historic England: They are exploring the use of AI to analyse aerial imagery and identify potential archaeological sites.
- HES: While not yet widely implemented, AI is already being used by the Heritage Information Business Services to deliver 5000 polygons in 6 months on a part time basis. The team is nearing completion on the UPRN work – with 300 out of 355 wards now done.

#### 6. **Challenges:**

- Data availability and quality: Accurate and comprehensive data is crucial for training effective AI models
- Ethics: Ensuring fairness, transparency, and accountability in AI-driven decision-making is essential.
- Need for human expertise: AI should be seen as a tool to assist, not replace, human experts in making informed designation decisions.