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Dear Sir/Madam,

## THE FOURTH NATIONAL PLANNING FRAMEWORK FOR SCOTLAND

Thank you for seeking our views on the fourth National Planning Framework (NPF4). We welcome the priorities identified in the call for ideas consultation paper. We have provided comments on these priorities in the attached [Annex A](#). We have provided comments to selected topic papers for Scottish Planning Policy (SPP) in [Annex B](#).

Historic Environment Scotland is the lead body for protecting, understanding and sharing Scotland's historic environment, for today and for the future. Our vision as expressed in our corporate plan [Heritage for All](#) is that we want to use the past to make a better future. We want the historic environment to make a real difference to people's lives: to our health, to our economy, to our culture, to our environment. We want heritage to involve everyone so that we all benefit.

We also lead and enable the delivery of [Our Place in Time](#), Scotland's historic environment strategy.

### National Planning Framework for Scotland – Call for Ideas

#### Key recommendations

In general, we have found that the National Planning Framework has proved to be a valuable tool in bringing about more integrated and coordinated development delivery. We would strongly recommend that NPF4 continues to build on this approach.

We are aware that there are a number of Scottish Government plans that will also shape development and land-use decisions over the lifetime of this plan. These include the recently published Culture Strategy, forthcoming the Climate Change Plan, the National Transport Strategy, the Strategic Transport Projects Review, the Infrastructure Investment Plan and the findings of the Housing to 2040 consultation. It will be essential for NPF4 to co-ordinate the delivery of the planning response to these plans. This will ensure that decisions on the use of our resources and location of infrastructure recognise the need for environmental protection in the long-term public interest.



We therefore urge NPF4 to reinforce the strong policy direction that any development and use of land is informed by a plan-led system. This must be underpinned by the policy principles of ‘the right development in the right place’ on an infrastructure first basis.

This is likely to be achieved by collaborative and partnership working, and we suggest that NPF4 should empower the public sector to take a lead role in this. This will ensure that development is not driven by market forces alone. This will be particularly important in the context of the advanced position of many city and regional growth deals.

The plan-led system will be all the more important in meeting the challenges brought by the need to tackle climate change and the economic recovery which is likely to be needed following the current COVID-19 pandemic.

Good decision-making needs a participatory approach. This is advocated in the [Place Principle](#) and in the [Historic Environment Policy for Scotland](#). The planning of our communities should take into account the needs of those who live and work in them. Recent events have shown that everyone needs to have easy access to a range of local shops and services, including greenspace.

### 1. What development will we need to address climate change?

The ongoing care and maintenance of our existing assets must be a central part of approaches to addressing climate change. These assets include our internationally renowned historic environment. This will ensure that our historic assets can withstand the effects of climate change and help us to make best use of existing resources.

We advocate taking a ‘whole life’ approach to our existing building stock, including traditional buildings. Traditional skills are required to carry out appropriate maintenance and repair work which contributes to jobs and the economy. There is a real need to address the practical support available to carry out such work. At the moment, Value Added Tax acts as a substantial disincentive to reuse. Taxing conservation, maintenance and repair work in this way effectively penalises sustainability and resource efficiency.

### 2. How can planning best support our quality of life, health and wellbeing in the future?

The places where we live, work and play affect our well-being. The historic environment is one of a range of factors that plays a key part in making good places. Place-based approaches enable communities to influence and identify long-term solutions. This can strengthen the connection between people and their place and help to tackle inequalities by involving people in decisions about resource use in their area.

The historic environment can be a focal point for a community – something to be proud of, and a place to provide the space for a range of services and activities which help to improve health and wellbeing, as well as community cohesion. Local Place Plans will be one way for communities to engage with planning their area. NPF4 must provide the foundation for this engagement.

### 3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?

Planning needs to set the framework for sustainable management of our historic environment. It is a source of rewarding jobs with a low carbon footprint. Working in the historic environment can keep traditional skills alive and support the ongoing care and maintenance of our historic assets. Recent events have heightened the need for NPF4 to



prioritise a plan-led system which allocates appropriate resources to support a green recovery.

#### 4. What policies are needed to improve, protect and strengthen the special character of our places?

NPF4 should take a holistic approach to the environment and recognise that what is often called 'natural' has actually been changed by people, over time. Scotland's rural areas, islands and coastal communities are characterised by the richness of their cultural and natural heritage. The culture and creativity generated and experienced by local communities also acts as a draw for visitors.

Our cities and towns also tell the story of Scotland; we want to see them reactivated and energised. As part of this change, spaces that were once used for retail will find new and creative uses, and town centre living will increase. This regeneration of our historic high streets will need support from the public sector. Some places might need funding to help unlock their potential as vibrant focal points for the communities they serve.

#### 5. What infrastructure do we need to build to realise our long-term aspirations?

Much of the infrastructure that will be needed to realise long-term aspirations of addressing climate change already exists. NPF4 should set the framework for its ongoing care and maintenance. This approach is supported by the findings of the Infrastructure Commission who found that we should be making the best of existing historic infrastructure, supporting the skills and technologies that will facilitate this and challenging perceptions that replacement is often preferable to reuse.

Our detailed comments on all of these topics are given in [Annex A](#).

### Scottish Planning Policy

In [Annex B](#) we have provided responses to selected topic papers for Scottish Planning Policy. They are as follows:

- [Valuing the Historic Environment](#)
- [Placemaking](#)
- [Delivering Electricity](#)
- [Rural Development](#)
- [Town Centres](#)
- [Sustainability](#)
- [Climate Change](#)

I hope this is helpful. We would be happy to provide further advice on any of the issues raised in this report. We would also like to offer practical support in preparing NPF4, where appropriate. Should you wish to discuss this or any of our comments in more detail, please contact Adele Shaw on 0131 668 8758 or [adele.shaw@hes.scot](mailto:adele.shaw@hes.scot).

Yours sincerely,

Barbara Cummins | Director of Heritage



## ANNEX A

### I. What development will we need to address climate change?

#### What we will need to do to reach the target of net zero emissions by 2045

- NPF4 must set out clear principles to ensure that the continued use and sympathetic adaptation of our existing buildings is prioritised.
- NPF4 should recognise that the sensitive use and adaptation of our traditional buildings has significant potential to reduce carbon emissions. It should set the framework for looking after our existing buildings and assets, taking an 'infrastructure first' approach.
- NPF4 should help to take forward the [recommendations of the Infrastructure Commission](#). Their report concludes that the proper maintenance of existing assets will ensure they perform more effectively during their lifetime – and that rebuilding is not always the best option.
- NPF4 should seek to influence a wide range of other policies and decisions to help to get the most out of our existing buildings, which are a valuable resource. As part of this, it should provide the basis for addressing the lack of VAT parity that has long been expressed as a barrier to the continued use and reuse of historic buildings. It is a substantial disincentive to reuse and effectively penalises sustainability and resource efficiency. NPF4 can help to progress the discussion by setting clear priorities for reuse.

The [Historic Environment Policy for Scotland](#) (HEPS) identifies a need for management of the environment to be more holistic. It recognises the benefits of taking a broader, long-term view of how we manage our environmental assets. HEPS also acknowledges that climate change – and the effort required to mitigate and adapt to its effects – is both a challenge and an opportunity for the historic environment.

#### The Built Heritage Investment Group

At HES, we have been leading discussions as part of the Built Heritage Investment Group on a number of factors that affect and influence the long-term management and conservation of Scotland's traditional buildings.

This work has included statistical analysis of Scotland's built historic assets, including estimates on number of assets by typology and information on how our built heritage is currently managed. The group has also developed some prioritisation models and approaches. These place cultural significance alongside the three pillars of sustainability: environmental protection, economic benefit, and societal benefit.

Our discussions have also focussed on thematic areas and asset types which are currently under pressure – or are expected to come under pressure in the future. This might be for a range of reasons including societal, economic and environmental change. As a group we have outlined potential interventions and approaches for the long-term management of these asset types.

#### Climate change

How we as a society choose to respond to climate change can present both challenges and opportunities. The historic environment can show us how we have responded to similar challenges in the past. Our existing built environment demonstrates the benefits of sustainable development over hundreds of years. We can see how technological developments, reuse, repurposing and recycling have kept buildings in use, and made them sustainable.

This is our chance to put learning from the past at the heart of planning for the future. We would welcome the opportunity to continue these discussions in the context of NPF4. These issues will play a crucial role in shaping our built environment for present and future generations.

Our [Climate Change Risk Assessment](#) highlights that Scotland's climate is changing at an unprecedented rate. The last century has been characterised by a continuous increase in temperatures, altering patterns of precipitation and increased frequency of unpredictable and extreme weather events. [The 2014 Sniffer report](#) shows that since the early 1960s, annual precipitation levels have increased by over 20%; it is now 1°C warmer, the growing season has been extended by over a month and sea levels continue to rise at over 3mm a year. This has implications for the historic environment.

Changing climatic conditions can alter and accelerate decay processes of archaeological sites. Historic buildings that have survived well in the past and in current climatic conditions may become less able to cope with changing weather patterns. Extreme weather events can cause catastrophic failure whilst also exposing longer standing problems with the use of inappropriate materials and lack of building maintenance.

### Prioritising existing development

As set out in our response to the [Housing to 2040](#) consultation, we advocate a 'whole life' approach to our existing building stock, including traditional buildings. This means the following:

- there needs to be a shift towards a culture of ongoing care and maintenance of existing buildings to reduce the demand for additional and often unsustainable resources for new buildings
- improvements to energy efficiency should be made whilst safeguarding the cultural significance of our traditional buildings
- sensitive reuse and appropriate adaptation of our existing buildings adds to the quality of Scotland's places whilst ensuring that resources are not wasted
- where demolition is necessary, salvage and reuse of sustainable materials should be a requirement

We support [the recommendations of the Infrastructure Commission](#) who have concluded that most of the infrastructure that will be used in 30 years already exists today. They also found that the proper maintenance of existing assets will ensure that they perform more effectively during their lifetime – and that rebuilding is not always the best option.

[Research undertaken by Historic England](#) has highlighted that buildings contribute to global warming over their whole lives: when we build, maintain, use and demolish them. Buildings are the third largest greenhouse gas (GHG) emitting sector after surface transport and industry (CCC, 2019). However, a lot of carbon is embodied in existing historic and traditional buildings in Scotland. The report concluded that that up to one third of the total carbon emitted from a new home is released during the construction and demolition process.

Current carbon accounting methods do not acknowledge the carbon costs for construction and retrofit. The use and reuse of historic and traditional buildings, whether they are tenements or warehouses, has huge potential to contribute to reducing GHG from the construction industry. It also reduces waste and extraction of new building materials. [The 2019 report from the UK Committee on Climate Change](#) has identified retrofitting existing homes as one of five priorities for government action.



[Research by Historic England](#) has shown that demolishing a historic building and replacing it with a new building could result in greater carbon emissions by 2050. Modern, highly processed building materials often have high carbon impacts in their manufacture, transport and use. The short life expectancy of these materials, and the lack of skills to repair and maintain them, can limit the lifespan of the building – and encourages waste generation.

The planning system should provide the driver for redressing the inequality between new and existing development. It should ensure that the policy framework prioritises the continued use and adaptation of existing buildings over demolition.

## Value Added Tax

Changes beyond the planning system are also needed. The taxation system must incentivise the retention, repair, maintenance and retrofit of existing buildings. This will ensure that the development and building sectors play their part in meeting the 2045 carbon targets.

The UK's Value Added Tax (VAT) system imposes a 20% tax rate on the repair, maintenance and refurbishment of existing buildings. New-build developments are tax free. This has been raised in recent years as an issue which works against the need to prioritise the upkeep of our historic buildings and places. These charges can be perceived as a disincentive to owners and developers undertaking maintenance and adaptation works.

The charges also run against wider priorities for ensuring resource efficiency and environmental sustainability. It has been presented to us that developers would rather demolish a building than pay additional VAT for its refurbishment.

We recommend that tax structures are reviewed to provide parity for the use and adaptation of our existing building stock. Tax reform has resulted in a substantial increase in funding for conservation projects in other European nations. In Italy, for instance, graduated tax relief and other fiscal benefits (under the 'Arts Bonus' tax scheme) are granted to private sector corporations funding the conservation of historic buildings. This relief has been reviewed by the European Union and is not classified as State Aid.

In the UK there are also currently reduced rates of VAT (payable at 5%) for certain works, including the installation of energy efficiency products, refurbishing long-empty homes, and the residential conversion of certain property types. Adopting a reduced rate for all works of repair and maintenance to existing buildings would streamline the tax regime. Potential increases in repair and maintenance projects may even make up the shortfall from any change in VAT rates.

Equalising VAT levels would support the Scottish Government's targets for carbon reduction and sustainability. This position on VAT for repairs and maintenance was raised in 2008 by the Scottish Government in a European Commission review and has since been endorsed.

Speculative developers often see the reuse and adaptation of historic buildings as unattractive. Restoration works often cost more, and nationwide there is a lack of expertise in the conservation and adaptation of historic buildings. The public sector must take a principal role in leading and enabling the reuse of our existing buildings and places for housing delivery.

Not all ruined buildings are suitable for reoccupation and adaptation. Many ruins have important roles as focal points in placemaking where they act as landscape or townscape features and are reservoirs of wildlife. Where a ruin is protected as a [scheduled monument](#),

there is a presumption that the monument will be preserved in situ in the form that it has come down to us.

Historic buildings can make a significant contribution to the circular economy. Nearly half of controlled waste comes from the construction and demolition industries. Existing buildings should be considered as assets. The preference should always be for their continued use and reuse – including materials salvaged from necessary demolitions. Retention and reuse of historic building stock and reuse of long lifespan salvaged materials can make a significant contribution to the circular economy and waste reduction.

People tend to think that it is difficult to adapt traditional buildings in response to climate change – particularly heating internal spaces. People also express concern about the way building regulations are applied to traditional buildings. One specific concern is that unsuitable interventions to traditional structures are justified as climate change adaptation. A factor in this is the way that Energy Performance Certificate ratings are assessed.

Inappropriate retrofit measures can lead to unintended consequences. They can even cause damage to traditional buildings. Measures to retrofit traditional buildings have been implemented sympathetically. We have produced guidance which we hope will address the perception that listed and traditional buildings are difficult to deal with or cannot be adapted. These issues are the focus of our [Managing Change in the Historic Environment: Use and Adaptation of Listed Buildings](#) guidance note, and the [case studies](#) that sit with it.

### The opportunities that this could provide to support jobs and the economy

- NPF4 should set the context for the proper care and maintenance of traditional buildings. This will help to support a variety of roles and traditional skills which make a contribution to jobs and the economy.
- NPF4 should recognise that the historic environment is a key environmental asset which draws tourists and visitors to Scotland and which supports a variety of roles.

The historic environment plays a role in Scotland's economy. [Scotland's Historic Environment Audit \(SHEA\)](#) estimated that there were 66,000 full time equivalent jobs (direct and indirect) in 2017, an increase of 20% from 55,000 in 2014. SHEA also estimates that the number of jobs provided by historic environment sector in Scotland comprises 20,000 full time equivalent direct employees. This does not include volunteers.

Over recent years there have been various reports of skills shortages facing the sector. There is widespread industry concern that a lack of appropriate skills in the future could be a threat. This could impact on the management, protection and conservation of the historic environment. We expect an increased demand for a wide range of specialist historic environment skills in future.

The historic environment supports a wide range of roles including traditional skills including:

- traditional joiners
- lime plasterers
- historic gardeners
- surveyors
- archaeologists

Good management of the historic environment will continue to support a wide range of roles and skills which will benefit jobs and the economy.

The historic environment also supports a wide range of roles which are not specific to the sector. There is, and will continue to be, an increase in demand for skills in areas including:

- ICT and digital
- leadership and management
- business and enterprise
- customer service skills (front of house)
- marketing and communication
- advocacy
- creativity and co-production
- events management

This emphasises the need to support the actions in the [Skills Investment Plan for Scotland's Historic Environment Sector](#). This will help to maintain a base of core technical and professional skills and build skills for sector resilience and growth.

### How places can be made more resilient to the long-term impacts of climate change

- NPF4 should re-emphasise the need for a plan-led system, strengthened by a requirement for public sector-led masterplanning to shape places and to ensure that they are developed in the long-term public interest rather than shaped only by market forces.

Our shared vision with Scottish Natural Heritage for landscape is set out in [People, Place and Landscape: A Position Statement](#):

- All Scotland's landscapes are vibrant and resilient.
- They realise their potential to inspire and benefit everyone.
- They are positively managed as a vital asset in tackling climate change.
- They continue to provide a strong sense of place and identity, connecting the past with the present and people with nature, and fostering wellbeing and prosperity.

Resilient landscapes are landscapes in good, robust and adaptable condition. They form the basis of climate friendly places. They help us adapt to climate change by enabling natural systems and processes to function well. They retain cultural significance and evidence of human interaction, now and in the future. To make and keep our landscapes resilient, we have to consider the environment on a holistic basis, and draw on both cultural and perceived natural heritage.

Our historic buildings and features enrich our places and can contribute to our sense of identity and civic pride. Investing in their reuse and ongoing care supports the wellbeing of communities. The quality of our historic environment can stimulate the regeneration of places and is a key driver for tourism growth in Scotland.

### What climate change-friendly places might look like in the future

- NPF4 should set the context for places to be developed using the approach set out in the Place Principle to ensure that change happens in a collaborative and participatory way.
- NPF4 should ensure that placemaking to tackle climate change takes account of the distinctive character of our existing communities and places.

Climate friendly places can only be achieved by working with the communities who live and work within them – using the approach set out in the [Place Principle](#). This will ensure that places are developed in a collaborative and participatory way. It puts the needs of the communities who live and work there are at the forefront of planning.





Placemaking to tackle climate change should also support the distinctive character of our existing communities and places. Opportunities for the reuse of empty buildings, brownfield and vacant and derelict land within our existing places should be prioritised in the delivery of new housing and associated community development.

These approaches encourage reinvestment in our historic environment; they can bring pronounced benefits to community well-being; they promote economic activity.

## 2. How can planning best support our quality of life, health and wellbeing in the future?

### Where we might want to live in 2050

- NPF4 should set the context for Scotland to be made up of places which offer a good balance of high-quality housing options which are affordable, meet the needs of people at all stages of life and where most essential services including education, health, community facilities and food could be accessed at a local level. Our places should be accessible for everyone, enabling people to move around easily with priority for people and nature over transport infrastructure.
- NPF4 should ensure that the planning system is empowered to enable forms of development which enhance our existing places, and to resist poor quality housing that is not sustainable and does not contribute to the quality of our places.

The places where we live, work and play affect our well-being. The historic environment is one of a range of factors that play a key part in making good places. Place-based approaches give communities influence and can deliver long-term solutions which strengthen the connection between people and place.

In 2050 the aspiration should be that Scotland is made up of communities with a good balance of attractive housing options where most essential services including education, health, community facilities and food can be accessed locally. Housing must meet the needs of people at all stages of life.

Our places should be accessible for everyone, enabling people to move around easily. Sometimes new developments are necessary. New development can be an opportunity to achieve things that might be more challenging working with existing layouts. One example of this is the [20 minute neighbourhood](#), where people can shop locally and make shorter journeys on foot or by bicycle and longer journeys by public transport. Including this idea in national planning policy could lead to better places and greater community well-being.

There are many smaller communities in Scotland that are now struggling as a result of depopulation and lack of housing options – investing in these places rather than creating new settlements should be the first option.

### How many and what types of homes we will need

- NPF4 should set the framework for the reuse of existing empty homes to ensure that they are brought back into viable reuse as safe and secure homes. This may require public sector intervention or incentivisation of repair and maintenance to bring such buildings back into habitable condition.

We noted in our response to the recent [Housing to 2040](#) consultation that new development should reinforce the distinctive characteristics of our places. Development should show an appreciation of the historic development of a place, as well as its urban forms, spaces and street patterns. Our existing buildings can provide design cues and lessons for the design and delivery of new development.

Much of Scotland's existing housing has been designed specifically to address climate considerations. Features like steep roof pitches and deep window and door rebates help to protect against cold, wind and rain. Good space standards give good light levels and ventilation. Many older homes have large windows and high ceilings. These buildings, including council and ex-council housing, were built with space standards that are often more generous than those in new builds today. Our historic buildings have survived for a reason and we can learn from them.



Older homes are also often designed and constructed to fit a specific environment. The Blackhouses on the Isle of Lewis, for example, were built low into the landscape, with rounded corners and thick walls to give protection and insulation against the strong Atlantic winds.

## Delivering homes

Housing delivery should be supported by a planning system empowered to enable forms of development which enhance our existing place – and to resist poor quality housing that is not sustainable and does not contribute to the quality of our places.

The delivery of housing which prioritises investment in our existing buildings and places should be incentivised. Financial and practical support should be offered to restoring developers. The public sector should be enabled to take a lead in the reuse of historic buildings for housing where this is appropriate. There are models of public interest led development where the financial risks of restoring our historic buildings and places for housing delivery are shared, and these should be explored.

There is clear evidence that we are not making effective use of our existing housing. This has a consequential effect on housing supply and affordability. The National Records of Scotland shows that 3% of all of Scotland's dwellings are vacant. The [housing condition survey](#) found that 75% of all dwellings have some degree of disrepair. Approximately 40% of buildings on the [Buildings at Risk Register for Scotland](#) are residential. This is the largest group in the Register.

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

This route can deliver housing more quickly than new build development. There is often no requirement to design, construct and seek permission for repair and maintenance works. The reuse and repair of vacant buildings for housing also brings wider benefits to our historic environment. It contributes to the quality of our places and drives economic activity. In town centres, reusing empty homes above shops can help drive regeneration.

## Enabling reuse

Enabling the reuse and refurbishment of existing buildings for housing might require greater public sector intervention. At HES we currently offer a [Historic Environment Repair Grant](#) and the [Conservation Area Regeneration Scheme](#) (CARS) for the maintenance and reuse of existing buildings.

CARS funding has been used to great effect on projects in Campbeltown in Argyll and Bute. Heritage and housing initiatives have combined to resolve and bring back into use a number of empty and poorly maintained houses. Argyll and Bute Council have promoted the reuse of homes by providing grant funding to people moving into the area for work.

A key area of our work is supporting the reuse of empty buildings for housing delivery. This is underpinned by the [Historic Environment Policy for Scotland](#) (HEPS). HEPS requires decisions affecting the historic environment to contribute to the sustainable development of our communities and places.

We have published guidance on the [Use and Adaptation of Listed Buildings](#) which includes information on approaches to secure the continued use or reuse of buildings as well as

advice on minimising risk to empty or underused buildings. Our [Buildings at Risk Toolkit](#) offers solutions for property that is vacant or at risk, and we also have a series of best practice [case studies](#) which demonstrate successful examples of reuse. We recommend that such approaches are promoted where appropriate. They should not be limited to designated historic assets.

Shelter Scotland's [Scottish Empty Homes Partnership](#) is currently pursuing initiatives for the reuse of empty homes. A good example is the work of the Empty Homes Partnership with Orkney Islands Council on the reuse of rural housing on North Ronaldsay. The project aims to attract young people and families to the area, and has taken a multi-agency approach to improving of existing infrastructure and employment.

Local authorities need the tools and resources to repair and bring empty buildings into use for housing where appropriate. This could include more scope to use Compulsory Purchase Order or Compulsory Lease powers where property is at risk. The recent Compulsory Purchase of a Category C listed detached house at Roseangle in Dundee is a good example of where such powers have been used successfully. The Scottish Government website has a [case study on this project](#).

### Whether we could target development to address longstanding differences in health and quality of life

- NPF4 should ensure that concentrations of single tenure housing types are avoided to ensure that our communities are sustainable and vibrant.
- Placemaking should reflect the needs of communities to ensure that they are able to access goods and services without having to rely on making car journeys.

The importance of addressing the needs of communities holistically is recognised more and more. Considering issues of the local economy, physical infrastructure and the cultural and social aspects of place together, rather than in isolation, can lead to better multiple outcomes.

Improvements to housing and the physical environment can reduce crime rates; feeling connected to a community can lead to better educational attainment; participating in community-led cultural activities can reduce social isolation and improve health and wellbeing.

Concentrations of single tenure housing type can drive inequalities and should be avoided. The provision of services, retail and work opportunities respond to demand and this can be skewed with single tenure.

Regeneration can be led by a number of variables, and heritage can be a key ingredient. Most of the buildings that will be standing in 2050 have already been built. However, the number of homes may actually rise as industrial and retail premises are converted for domestic use.

Retaining existing building stock should be the priority. Existing stock contributes to the unique character of Scotland, and the construction industry contributes a significant proportion of Scotland's waste and greenhouse gas emissions. Over the past few years, the clear ability of existing building stock to contribute to sustainability and carbon emissions reduction has been demonstrated through the HES-sponsored Conservation and Climate Change Award at the Royal Incorporation of Architects in Scotland (RIAS) Awards.

## How we can encourage more people to live in rural Scotland

- NPF4 should set the context for sustainable and vibrant rural communities who benefit from affordable housing, secure and rewarding employment, high quality surroundings and modern services.
- NPF4 should adopt recommendation 12 of the Rural Planning to 2050 report.

In the context of a low carbon future, the most successful way of encouraging more people to live in rural Scotland is likely to be through retaining and strengthening existing settlements. This must be done in a sensitive, plan-led way – taking account of the needs of the existing communities so that their distinctive characters are retained.

Retention and growth in population in rural communities may increase with technological advancements but infrastructure to connect these communities as well as services will still be essential. For many people living in rural areas, part of the appeal of their area is the historic and natural environment. Tourism is an economic driver in many rural areas, and for most visitors the built and natural heritage is a major draw. It is therefore important that the historic environment continues to be carefully considered when planning new development.

The stewardship of Scotland's historic environment should be a key consideration when planning sustainable places. Our approach to this is set out in the [Historic Environment Policy for Scotland](#) (HEPS). HEPS sets out a framework for decision-making rather than presenting a detailed and prescriptive approach. We believe that this will support sustainable rural development which is also attractive and characterful.

We support recommendation 12 of the [Rural Planning to 2050](#) report which states:

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

## Whether and where we might need new settlements, and regeneration of existing communities

- NPF4 must resource planning authorities to ensure that they can enable developments which enhance our existing places and create new places which are vibrant and sustainable.

The need for new settlements must be considered in light of a plan-led system. We have been involved with East Lothian Council's proposals for a new development at Blindwells, and we have welcomed their holistic approach to planning for this new settlement. They have worked with Key Agencies, land owners and developers to identify the opportunities and challenges that planning on this scale brings. Planning new settlements in this way could mean that development plans lead not just on the spatial strategy for development, but the success of the places that are developed.

Planning departments need to enable forms of development that seek to enhance our existing places, and to resist poor quality housing that is not sustainable and does not contribute to the quality of our places. They must be empowered and resourced to do this. This will be a key aspect of delivering high quality new development.



## How places could be more inclusive, diverse, creative, vibrant, safe, resilient and empowering

- NPF4 should provide the framework to empower communities to express what is significant to them.
- NPF4 should ensure that collaborative, place-based approaches to creating places become the norm. This will help to create the conditions for culture to thrive and to realise a wide range of outcomes for people including improved health and well-being, social cohesion and reducing inequality.

Heritage can provide a focus for a community, a reason to visit a place and something to be proud of. Historic buildings and features enrich our places and can contribute to our sense of identity and civic pride.

Using existing assets can increase sustainability and help retain and create a sense of place. Targeting investment toward their reuse and ongoing care can support the wellbeing of communities.

### Regeneration of places

The quality of our historic environment can often stimulate the regeneration of places. [A Culture Strategy for Scotland](#) notes that culture is central to successful placemaking. It recognises that cultural activities are an important economic driver in their own right and that they also increase the interest and appeal of our built environment. There are a number of examples from around Scotland of how the historic environment has formed a catalyst for community action and for public and private sector partnerships.

At Govanhill in Glasgow, the community has mobilised to save the [Govanhill Baths](#) on Glasgow's South Side following closure in 2001. The Baths were built in 1917 as swimming pools, public baths and 'slipper baths' - individual baths that could be hired to wash in. They also had a steam laundry where local people used to wash their clothes and chat.

The baths were closed after being used in much the same way for decades. The community wants to reopen the Baths for their original purpose and to act as a catalyst for wider change. It is the first step in developing the Govanhill Baths as a wellbeing centre. It will contribute to wider social and cultural outcomes and the regeneration of Govanhill. These include a wellbeing programme aimed at delivering multiple benefits – providing an outlet for creativity within the community and facilitating employment opportunities.

Local Place Plans will be important way for communities to engage in planning their places. NPF4 should provide the foundation for engagement and expression. We are producing guidance in order to assist communities who want to investigate, understand, share and celebrate, and care and protect their heritage. We hope that this will form part of a range of tools available to communities to help them to say what is important to them. We are keen to work with the Scottish Government to understand how our forthcoming guidance can support the proposed approach to Local Place Plans.

### 3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?

#### What our economy might look like in 2050

- NPF4 should set the framework for sustainable investment in Scotland's built heritage which can deliver real benefits to Scotland's local and national economy.

[Scotland's Historic Environment Audit \(SHEA\)](#) found that in 2017, the historic environment generated £4.2 billion for Scotland's economy. It supported 66 thousand full time-equivalent jobs (direct and induced) and attracted 18 million visitors in 2018.

By 2050, Scotland's economy will have been subject to the impact of both Brexit and the current COVID-19 pandemic. There will greater importance placed on the need to find sustainable investment models and low carbon, secure and rewarding jobs. Domestic supply chains will need to be stronger to ensure future resilience. The historic environment can be a key resource in supporting a green recovery.

Sustainable investment in Scotland's built heritage can deliver real benefits to Scotland's local and national economy, its communities in areas of social deprivation, and to its children and young people. It will have to play a crucial role in addressing challenges and opportunities in relation to the climate emergency. [A Culture Strategy for Scotland](#) acknowledges that culture and the historic environment also provide a platform for people to age actively, maintain health and be engaged.

There will be a need for economic recovery following the COVID-19 pandemic. We strongly recommend that NPF4 restates the policy principle of 'the right development in the right place'. We need to secure an appropriate balance between the economic need and environmental protection to makes sure that development does not take place at all costs. This increases the requirement for development to be directed to the places where it is needed by a plan-led system, in the long-term public interest.

Investing in our existing built heritage and building stock is a sustainable solution for housing. It can help meet the challenges presented by climate change at the same time as contributing to better places and the wellbeing of communities. Much of the historic built environment was constructed in an inherently sustainable way. There is much to learn from past approaches to materials, supply, design and the benefits of a skilled and locally based labour-force.

This is heightened by the need for economic recovery, the challenge of addressing the climate emergency and the requirement to create of resilient places. Underpinning all of this is the supply of skills. Research undertaken in support of the [Skills Investment Plan for Scotland's Historic Environment Sector](#) identifies gaps in traditional building and conservation skills, for example. Policy that prioritises the ongoing care and maintenance of our existing buildings and places through traditional skills would help to address these gaps.

Public sector funding might be needed to unlock the potential of local economies in many places around Scotland. Funding from [Conservation Area Regeneration Scheme](#) (CARS), has been an important asset for many of Scotland's towns and cities. CARS can act as a catalyst for tourism and additional investment in the repair and restoration of our towns' historic buildings.

The physical effects to town centres and buildings from CARS funding are considerable. But it also brings additional benefits such as attracting investment, jobs and tourism, which have

meaningful and long-lasting effects. CARS also brings investment in the development of appropriate skills for the conservation, repair and maintenance of our historic environment.

## How planning can anticipate and respond to the economic challenges of Brexit

- NPF4 should set the framework to ensure there is a supply of materials and skills for the ongoing care and maintenance of historic assets.

Labour and supply of building materials are identified areas of concern for the heritage sector. Both of these could have consequential effects for the planning system and the completion of projects. This puts greater emphasis on the need to ensure that supply of both materials and skills are sustainable.

Removing EU governance and regulation could bring about more radical economic and trade policy changes. These could have a direct effect on land use. One example of this is freeports – zones where tariff-free trade could drive land-use changes which could bring trade policy, reserved to the UK government, into conflict with the devolved status of planning.

## What the key sectors might be and what infrastructure they may need to support them

### Tourism

NPF4 should set the context for putting in place the relevant infrastructure to support communities – particularly in rural and island areas – to deal with the effects of tourism. It should enable visitors to make journeys in an environmentally and economically responsible way.

### Energy

NPF4 should take a whole system, infrastructure first approach to a low carbon energy future, putting in place a policy framework which focusses on the following:

- reducing demand
- increasing energy efficiency
- meeting residual needs from green technologies following the principle of locating the right development in the right place

### Building materials

NPF4 should prioritise the use of sustainable, locally-sourced Scottish building materials. This will offer a sustainable, low carbon solution whilst providing skilled jobs for local economies.

The housing sector is addressed under [question 2](#) above and in our [Housing to 2040](#) response. Other sectors which are highly relevant to the work of Historic Environment Scotland as a tourism operator and as a consultee in the planning system are identified below.

## Tourism

Historic Environment Scotland is the largest operator of paid-for visitor attractions in Scotland. Part of this involves directly operating and maintaining some of Scotland's busiest and most recognisable landmarks, such as Edinburgh Castle and Skara Brae. Growth in visitor numbers brings additional pressures. Key amongst these are:

- increasing emissions from travel
- rising levels of consumption and production
- conservation and management challenges.



To continue to realise the benefits of access to the historic assets that HES manages as visitor attractions and to the wider historic environment, we must ensure that growth happens in a responsible and sustainable way.

The tourism sector has the potential to act as an agent for change, triggering impacts on and beyond the sector – but only if it is well managed. We have made a commitment through our [Corporate Plan](#) to promote sustainable tourism. We want our visitor attractions to be sustainable places to visit, and to take into the account the needs of local communities as well as the needs of our visitors and other stakeholders.

A good example of responsible tourism is the [2019 winner of the HES Conservation and Climate Change Award, the Borders Distillery in Hawick](#). The project repaired and reused an empty listed building in Hawick's town centre. As well as targeting zero waste in operation, the building provided no restaurant or café facilities, ensuring visitors used the town's facilities.

Increased tourism can bring additional pressure to rural and island communities. We must make sure that these communities are resilient enough to deal with mass tourism without eroding the very thing that draws people to Scotland. We welcome the [Rural Tourism Infrastructure Fund](#) (RTIF), which has been put in place to alleviate pressure on infrastructure and negative impacts on some local communities.

[Doune Castle](#) has seen a dramatic increase in visitor numbers as a result of featuring in a number of successful TV series, including as a main filming location in *Outlander*. We have been working in partnership with Stirling Council and Kilmadock Development Trust to find ways to encourage visitors to the castle to explore the wider village, benefitting local businesses. As part of this, an award from the fund will help to deliver improved paths and facilities.

Based on the experience of our involvement with projects under RTIF, we would support a more strategic, joined up approach to planning for tourism – working in partnership with local authorities and other relevant parties. We think there is an important role for planning services in this approach. Services could co-ordinate action to ensure that there is infrastructure to support increased tourism, whilst protecting the internationally renowned heritage assets that draw people to Scotland.

## Energy sector

We recommend that NPF4 takes a whole systems approach to a low carbon energy future, taking an infrastructure first approach. Specifically, NPF4 should put in place a policy framework which advocates:

- reducing demand
- increasing energy efficiency
- meeting residual needs from green technologies following the principle of locating the right development in the right place

### Reducing demand

The drive towards improving energy efficiency in homes needs to be handled carefully. Traditional buildings must still be able to cope with hotter, drier summers and warmer, wetter winters without overheating. Traditional buildings were designed to be passively ventilated. The sensitive reinstatement or refurbishment of passive ventilation features can contribute to community resilience and wellbeing. There is more information on traditional buildings, and how we use this term, on [the traditional buildings page of our website](#).

Several of our recent HES winners of the RIAS Conservation and Climate Change award have utilised passive ventilation within their schemes. [The Hawick Distillery](#) and [the Garment Factory](#), a refurbished office block in Glasgow, are both used as [case studies](#) in our [Managing Change in the Historic Environment](#) guidance series.

In addition to implementing measures for energy efficiency, NPF4 should encourage behaviour change to reduce demand for energy. Ultimately this will rely heavily on behaviours and mechanisms outside the planning system. However, some measures could be implemented in relation to the construction sector.

NPF4 should influence behaviour by embedding the principle of a plan-led system which directs land-use decisions. It should follow the recommendations of the Infrastructure Commission and take an infrastructure first approach, prioritising the care and maintenance of existing assets.

### Energy efficiency

[The Scottish House Condition Survey 2018](#) noted that the vast majority (75%) of all dwellings have some degree of disrepair. This is an increase on the previous survey. 73% of pre-1919 buildings are in a state of critical disrepair.

Addressing this issue in parallel with the construction of new homes will contribute to improved health and wellbeing. Issues like damp and mould caused by poorly maintained roofs and rainwater goods have a negative impact on health – particularly for those with respiratory conditions such as asthma.

Well maintained buildings are more energy efficient, and more resilient to the impacts of climate change. NPF4 could support local, subsidised schemes such as the [Traditional Buildings Health Check](#) (TBHC).

TBHC was a pilot project which ran from 2013 – 2018. It was initiated by HES in partnership with Construction Industry Training Board (CITB) Scotland. CITB which encourage property owners to take a more proactive approach to maintaining their buildings. TBHC inspected 245 member properties and 144 buildings, and reported that:

- Virtually all buildings inspected had some elements in need of repair, with 88% requiring work in the next 12 months.
- Repair works were commissioned for an estimated 120 member properties.
- The total estimated spend by owners on their properties £1,273,389.
- Members joined for a range of reasons which including to find out if there were problems they were unaware of and to seek professional advice.
- TBHC reporting supported members to carry out their intervention appropriately and a number of members carried out additional work as a result of the TBHC report.
- Owners felt more confident commissioning repair work once they fully understood the condition of their property.
- Discussions with members revealed additional causes of disrepair. These included a lack of property owner knowledge and insufficient numbers of skilled contractors which resulted in a mix of inactivity and low quality, poorly executed repairs.

Traditional forms of construction are often highly effective in using low carbon materials and having low operational energy. They are designed to be well ventilated and can use locally sourced skills and long lifespan materials.

More than 85% of the building stock that will exist in the year 2050 is already built. Half of all dwellings in the UK are more than 50 years old, and a fifth are more than 100 years old. Typically, buildings experience a number of refurbishments throughout their life, with a major

refurbishment every 20 to 30 years. These refurbishments and retrofits represent an opportunity to reduce carbon emissions through refreshing a building's fabric and services equipment. The benefits of applying traditional techniques is clear from our existing building stock.

Historic and traditional buildings and their designation are not a barrier to change. They enable sustainable development which can help in the creation of successful, vibrant places. Energy efficiency and adaptation can be achieved through sensitive retrofit of existing buildings, including traditional/historic buildings. There is a wealth of support and guidance on this available from HES and other organisations including city heritage trusts.

### Meeting residual need

Meeting residual need should take a plan-led, infrastructure first approach, particularly for onshore renewables. Areas where grid connections are available should be the priority for such development.

The current framework broadly achieves its aim of ensuring the right development in the right place, with appropriate safeguards to protect our environmental resources. This includes the historic environment for which Scotland is internationally renowned.

Our role in the planning system means that we see and comment on any major wind energy development in Scotland. We have identified an issue with how the historic environment is factored in to the development of onshore wind proposals. This often does not happen at an early enough stage.

This means that we are having to object to proposals which raise issues of national interest for the historic environment. In many cases this is avoidable and could be resolved as part of the site selection process. In other cases, the level of impact could be reduced through the design process, but we are finding that this does not happen until we object. It is not clear whether this is due to an issue with the existing policy framework or with guidance. We would be happy to discuss this further.

We welcome and support the recognition in the [Onshore Wind Policy Statement](#) that there are competing and complementary objectives of land-use planning which are relevant to consider in achieving a net zero carbon economy on a case by case basis. NPF4 should strengthen the case for implementing the principle of the right development in the right place. It should restate the principle currently included in paragraph 28 of SPP that the aim is not to achieve development at all costs. NPF4 should set the framework for action in this context.

We have included in Annex B a submission in response to the SPP topic paper on [Delivering Electricity](#).

### Building materials

The construction industry is one of the biggest contributors to carbon emissions in Scotland. Locally sourced building materials such as stone, slate and timber offer a sustainable, low carbon alternative to importing materials which do not have the same character.

Supplying locally sourced building materials also provides skilled jobs for local economies. Quarrying, stone processing, forestry and timber processing offer employment opportunities. Small-scale production of materials such as thatch can also offer entrepreneurial opportunities. The production of these materials provides an opportunity to encourage young people to move to rural and island communities. At HES we have been working with Highland and Islands Enterprise and Argyll and Bute Council since 2018, using training and materials production to identify economic opportunities for communities in the region.



In partnership with the British Geological Survey, we have developed the [Building Stone Database for Scotland](#) (BSDS). This is an existing resource available to planning authorities. The BSDS is a GIS-based resource that shows the location of historic and active stone quarries in Scotland and includes a growing number of examples of built sites and technical data for each stone type.

We will continue to identify areas of opportunity and demand for the production and supply of indigenous materials. Planning authorities should also identify these opportunities through their Local Development Plans.

We have identified some examples of specific areas where NPF4 could support the supply of indigenous materials:

- **existing aggregate quarries** – incentivise or encourage aggregate quarries to diversify into producing dimensional stone
- **local stone atlases** – encourage local authorities to work with the British Geological Society to research and develop short guides to local building stone and feed into the Building Stone Database for Scotland
- **delph approach** – encourage the extraction of local stone, even where this is extracting waste material from historic quarries to process into usable building stone
- **slate** – encourage support for Scottish slate, which is an abundant natural resource that is currently completely unused

### How planning could stimulate and distribute growth

In order to stimulate and distribute growth, NPF4 needs to:

- provide certainty for investors and communities through a plan-led approach guided by the principle of ‘the right development in the right place’
- clarify the links between Regional Spatial Strategies and Regional Land-Use Plans to ensure fair distribution of growth and resources between urban and rural areas
- integrate growth deals with the planning system more clearly to ensure investment opportunities and priorities are aligned



## 4. What policies are needed to improve, protect and strengthen the special character of our places?

### What special places will need protection in the future

- NPF4 should restate the policy principle of ‘the right development in the right place’. This should be underpinned by an ‘infrastructure first’ approach and a plan-led system which emphasises the need to prioritise the ongoing care and maintenance of our existing buildings and places.

NPF4 must reinforce the strong policy direction that any development and use of land required is informed by a plan-led system. This system is underpinned by the policy principle of the right development in the right place not development at all costs. Implementing this will improve, protect and strengthen the special character of our places.

The call for ideas does not explain the term ‘special places’. We consider all landscapes important because everyone has a right to live in and enjoy vibrant surroundings. It is not only some places that are special and deserve protection.

The principle of the right development in the right place should ensure that the existing character of our cities, towns, rural, coastal and island communities is considered when new development is planned. Decisions taken today must be carefully considered so that our places and landscapes can continue to support us and enrich people’s lives in future.

Focus should move to using planning as a tool to connect and integrate protected historic sites with surrounding towns, cities and countryside better – not just protecting them as ‘islands’ within development. This should be underpinned by a holistic approach to the environment.

What is called ‘natural’ is often inextricably linked with change to the environment by people, over time. Established ways of managing places we value do not recognise that the natural and cultural environment are so closely linked and that benefits and outcomes are often interdependent.

Successful collaboration in the face of the climate emergency and other challenges will depend, as it always has done, on well informed planning decisions. Decisions must support the most productive distribution and effective connection of people, places and resources. Historic places and assets will need to adapt to changing circumstances like increasing extreme weather events. Interventions should seek to protect their special character, while responding to changing needs.

We also recognise that sometimes the best actions for the historic environment will not be the best actions for other interests. There will be occasions where decision-makers need to manage conflicting needs, which puts greater emphasis on the need for more collaborative working. Potential conflicts should be identified and reduced as much as possible.

## What the future might be for our rural, coastal and island communities

We have provided detailed comments and recommendations for rural areas under [question 2](#).

### Coastal

- NPF4 should set the framework for integrating or supporting a range of policy areas including: coastal erosion and flood risk management; shoreline management planning; management of designated sites; supporting marine and terrestrial planning.

### Islands

- NPF4 should provide the mechanism to ensure that many of the actions in the National Islands Plan in relation to arts, culture and heritage are delivered.

## Rural

NPF4 should set the context for sustainable and vibrant rural communities who are able to benefit from affordable housing, secure and rewarding employment, high quality surroundings and modern services.

In the context of a low carbon future, the most successful way of encouraging more people to live in rural Scotland is likely to be retaining and strengthen existing settlements. This must be done in a sensitive, plan-led way so that their distinctive character is retained. The need for new development, rather than reuse or adaptation of existing assets, must be clearly demonstrated.

We support recommendation 12 of the [Rural Planning to 2050](#) report which states:

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

The recent [Royal Incorporation of Architects in Scotland](#) (RIAS) awards show the potential for high quality architecture in rural areas which responds to their unique environment. [Altarf](#) on the Isle of Skye is a prototype micro home developed as a low cost, thermally efficient, mobile house, designed for the rural landscape.

We have provided a [response to the topic paper on rural development](#) in [Annex B](#).

## Coastal

[Research undertaken as part of the Dynamic Coast programme](#) concluded that it is becoming clear that coastal erosion has the potential to impact on coastal assets whether they are protected or not. Coastal erosion is acting both individually and jointly with associated coastal flooding; it is happening now and will continue into the future.

Investment in nature-based solutions to help communities adapt to the changing climate and our changing coastline is required. [Dynamic Coast: Scotland's Coastal Change Assessment](#) is providing case studies that include developing adaptation plans for vulnerable stretches of coast. These show how we may be able to protect the places we value in future, including our coastal scheduled monuments and World Heritage Sites.

## Islands

The recently published [National Islands Plan](#) tells us that island communities are passionate about capturing, celebrating and sharing the uniqueness of their island experience. We know from research carried out to support the preparation of the plan that islanders also feel

strongly about preserving built heritage and the natural environment. Islanders value their environment not just for its economic value through tourism, but for the quality of life it supports, and as a legacy for future generations.

Scotland's islands are characterised by the richness of their cultural heritage and the culture and creativity generated and experienced by local communities today. The Islands plan states that many of the islanders who took part in the consultation, their sense of self and their sense of community is rooted in the culture and heritage of the island they live on. We would be happy to support the delivery of Strategic Objective 11 of the National Islands Plan, to support arts, culture and language.

### How we could unlock the potential of vacant and derelict land

- NPF4 should strengthen the ability for a plan-led system to ensure that development is always directed towards brownfield sites before greenfield sites are considered.
- NPF4 should direct a more pro-active approach in development planning to resolving vacant and derelict land – for example considering tools like masterplan consent areas to facilitate development.
- NPF4 should strongly encourage active approaches to resolving these sites such as the use of compulsory purchase, and should consider how the associated financial risks to local authorities can be addressed.

Many places in Scotland already suffer from poorly maintained, vacant and at-risk buildings and structures. There are over 2,000 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 2018 [Scottish Vacant and Derelict Land Survey](#). Much of this land is former industrial, manufacturing and defence sites and includes associated historic structures. The Scottish Government's [2017 House Condition Survey](#) reports that 75% of all dwellings in Scotland have some degree of disrepair. More than a quarter of dwellings require 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. This contributes to population decline and health and social problems.

The delivery of housing should serve to support the distinctive character, resilience and prosperity of our existing communities and places. Opportunities for the reuse of empty buildings, brownfield and vacant and derelict land within existing places should be prioritised in the delivery of new housing and associated community development. These approaches not only encourage reinvestment in our historic environment, they also bring pronounced benefits to community well-being and promote economic activity.

The plan-making process should be public-sector led. This will ensure that other factors are given a higher priority than market forces. Brownfield sites are often located close to existing services, and development of these sites is more likely to help deliver other priorities. For example, investing in existing places will also bring benefits to struggling town centres by increasing economic activity.

A 'whole-life' approach to the costs of dealing with vacant and derelict sites should be encouraged. This should consider factors such as the cost of enforcement and the long-term economic impact of derelict sites. To be properly informed we must take into account the costs of failing to resolve issues as well as the cost of resolving them.

The resolution of vacant and derelict land demands a multi-agency collaborative problem-solving approach. NPF4 should facilitate this approach by ensuring the current detrimental

impacts of such sites are first understood. It should set resolution out as a priority and require positive action from local authorities and agencies. The Key Agencies Group is well-placed to help to develop a detailed approach to vacant and derelict land, as collectively we are involved in detail in all of the potential issues.

## What our city and town centres might look like in the future

- NPF4 should reinforce the town-centre first approach to set the framework for place-based regeneration projects informed by the characteristics of the place and the needs of the community, to strengthen the character and resilience of our town and city centres.

Our cities and towns help tell the story of Scotland. They have always been a focus of activity, and have grown, shrunk and adapted to meet the changing needs of society. It is widely recognised that we are in a period where our town centres need to adapt.

We know that traditional high street retail will continue to shrink, and the delivery of public and retail services will continue to digitise. We also know that our demographic is changing and ageing rapidly and the relationship between people and place is evolving. Our climate is changing too, and both people and places will need to adapt and respond.

We want to see our towns reactivated and energised. To do this we anticipate former retail space will be repurposed for new and creative uses, and town centre living will increase. We want our towns and cities, which have long been valued for their cultural significance, to become more convenient, accessible, vibrant. We want them to have active and empowered communities shaping how these changes takes place.

Public sector funding for heritage-led regeneration projects can unlock the potential of our cities and towns – making them vibrant and characterful places to live, work and visit. As noted under [question 3](#), our Conservation Area Regeneration Schemes can act as a catalyst for local authorities to implement strategies for the care and maintenance of their historic buildings to revive towns and cities.

In Orkney, the town of [Stromness has implemented an award winning regeneration programme](#). The programme included improved public realm, restoration of the town's historic built environment, new community and educational facilities, and new housing.

Once a major port for wartime vessels, Stromness was also a centre for shipbuilding and maritime trade. The herring boom brought success to the town in the 19th century, but its decline coupled with larger industrial shifts and urbanisation saw the town struggling by the late 20th century.

The regeneration process was led by a cross-council, place-focused task force. The project was a long-term, cumulative one [funded through a Townscape Heritage Initiative and Conservation Area Regeneration Scheme](#). The overarching aim was aiding the regeneration of the town centre and ensuring economic viability through investment in built heritage.

As improvements began to take place, Stromness became more attractive to outside investment. This in turn supported the ambitions of the project. The council-funded schemes resulted in a total of £6.5 million of public/private investment – of which £4.8 million was spent with local building contractors. Improvements in the built environment and local facilities stimulated both business and community life. The regeneration project has also stimulated the cultural life of the town. Stromness has become a more attractive place to live, work and visit.



## How we can get the most out of our productive land

- NPF4 should ensure set the framework for a joined-up approach, ensuring that Regional Spatial Strategies and Regional Land-Use Plans take account of the character of their areas. In turn this should inform Local Development Plans to ensure that development is directed appropriately.

Many of Scotland's nationally important designated historic environment assets lie in rural areas: these include three World Heritage Sites, the vast majority of Scotland's 8000 scheduled monuments, and many listed buildings and sites on the Inventories of gardens and designed landscapes and historic battlefields. There are also over 300,000 undesignated historic assets.

Together these features, along with our natural environment, create Scotland's world-famous landscapes. They include ruins, earthworks and traditional buildings as well as the field systems, plantations and other patterns produced by past land management. Sub surface archaeological deposits and palaeoenvironmental soils also contribute.

These features create beautiful places that have unique cultural associations known throughout the world. The rich landscape of Orkney, shaped by human interaction with the landscape over millennia, and recognised in parts as a World Heritage Site, is a good example. We must remember that the historic environment assets that together form these landscapes are non-renewable. Once lost, they are lost forever.

Scotland's soils provide a wide range of environmental, economic and societal benefits. This includes preserving cultural and archaeological heritage. This is set out in the [Scottish Government's Soil Framework](#). Soil erosion was highlighted through Scotland's Climate Change Adaptation Programme as being an unmanaged risk. Many soils that act as carbon reservoirs are also key features of or are key to the preservation of the historic environment.

Archaeological sites identified in arable land as cropmarks are a useful proxy of where erosion is likely to be happening. Research into the preservation of sites through addressing soil erosion may be relevant and alternatives to traditional ploughing. These issues are discussed in this BBC News article – [Farmers are abandoning traditional ploughing](#).

Our productive land contains a rich resource of archaeological remains and historic sites. Promoting their good management and public access to them where appropriate should be integrated into our system of rural payments. This could include good management of stock to reduce over-grazing and erosion and retaining traditional drystone dykes. It might also include providing unploughed areas around archaeological sites like standing stones.

Viewed collectively these individual management decisions combine to preserve and enhance our distinctive rural landscapes and protect the contributions they make.

Joined-up action is required to ensure that our most productive land, and the important archaeological information it contains, is protected. Regional Spatial Strategies and Regional Land-Use Plans should inform Local Development Plans to ensure that development is directed appropriately.

As noted in more detail below, any future reliance on ecosystem services or natural capital accounting for land-use planning and decision making has to take full account of the contribution the historic environment makes to landscapes and provisioning and regulating services. We would happily contribute to developing and improving the current system to ensure this is adequately covered.



## How we can protect and restore peatland

- NPF4 should set the framework for a holistic approach to peatland management. This should recognise that peatland contains important evidence of our past as well as being a resource which can deliver benefits for present and future generations. A holistic approach will also minimise the potential for unintended consequences of actions to the archaeological resource of proposals to restore peatland.

We recognise the multiple benefits that can be achieved from peatland protection and restoration. In addition to carbon sequestration, maintenance of biodiversity, assistance with flood alleviation and the reinstatement of other natural processes, peatlands can contain and protect significant archaeological and palaeoenvironmental deposits such as the remains of settlements and organic material. These areas can provide significant evidence of past human activity and land use.

The re-wetting or restoring natural water flow to areas of degraded peatland could also assist with minimising any damage that is already being caused to archaeological remains. Equally, limiting peat harvesting reduces the risk of disturbing or damaging unknown buried archaeological deposits or palaeoenvironmental sequences which may be of great significance to our cultural heritage.

However, peatland restoration also poses a potential threat to the preservation of historic assets. Much peatland restoration is undertaken outwith the planning system and as such is not subject to the same controls and measures as development. This means that its impact on historic assets is not fully understood. Altering the water table can saturate archaeological deposits leading to damage, and the growth of peat can bury sites, excluding them from future monitoring and research.

While the protection and restoration of peatlands is of critical national and international importance, it must be regulated. Proposals should be assessed for positive and negative impacts on archaeological sites and palaeoenvironmental records, which are by their nature finite.

## How we can plan blue and green infrastructure

- NPF4 should set the framework for the delivery of blue and green infrastructure as part of placemaking, recognising that some of our blue infrastructure already exists and that it should be integrated into development proposals whilst protecting its cultural significance.

Some of our blue infrastructure already exists in the form of canals which are historic assets in their own right. Sensitively managed, they can add to sense of place and provide active travel corridors.

The [North Glasgow Integrated Water Management System](#) (NGIWMS) shows that historic assets can be adapted to address major infrastructure challenges whilst protecting and enhancing cultural significance. The NGIWMS formed a 'smart' canal across seven local authority areas. This included infrastructure projects addressing flood alleviation, river water quality improvement, and environmental improvement schemes and used the Forth and Clyde canal, which is protected as a scheduled monument. The system manages water in a strategic manner using modern technology, and generates new income streams that secure ongoing maintenance and enhancement of the canal network. This is a great example of the potential of the historic environment to deliver multi-faceted public benefits.

Delivering green and blue infrastructure should be seen as an integral element of placemaking – from national to site level. Investment decisions for blue and green

infrastructure should be closely aligned to the needs of communities and integrated with wider place objectives, using a place-based approach.

Integrating green routes with the historic landscape and using them to provide access to historic sites helps provide focal points and interest. This encourages journeys as ‘an end in themselves’. This could increase the use of these routes and contribute to the sustainability of the historic environment. A great example is the [Kintyre Way](#). The way starts at the consolidated, community owned Tarbert Castle, which provides a memorable starting point with a unique sense of place. The way helps to deliver economic benefits for the town and contributes to a sustainable future for the Castle.

### What we can do to protect and enhance biodiversity

- NPF4 should take a holistic view of ways to protect and enhance biodiversity and the historic environment to ensure that benefits and outcomes to both are recognised. A holistic approach will also ensure that the potential for unintended consequences is minimised.

Scotland’s hedges, fields, forestry, water systems and wetlands are all man-made features. These habitats are part of the historic environment, and they play a significant role in the protection and enhancement of biodiversity. Many historic sites and landscapes are well preserved and have allowed the preservation of local habitats and species. They are reservoirs of wildlife which can support conservation initiatives, with important local populations of plants and animals.

Larger sites and linear features, such as the Antonine Wall World Heritage Site, are important wildlife corridors. Corridors like these allow plants and animals to migrate and spread as they react to pressure from development and climate change.

Where there is potential for conflict between historic environment interests and biodiversity, this should be assessed. Good planning and mitigation can normally allow for any negative impacts to be managed.

Ecosystem services and natural capital accounting have formed the basis for much land-use based decision making. These processes do not recognise the contribution the historic environment makes to our landscapes, or how it relates to biodiversity. Significant work is required to ensure the historic environment is recognised within natural capital accounting methodologies. It makes a contribution to provisioning and regulating services and this is not recognised in existing frameworks. This is a significant gap which we have recognised as a risk. We are scoping some research which will explore how to address this. The development of Regional Land Use Plans should support this research. We would be happy to work with partners to develop this further.

Established ways of managing the natural and historic environment do not always recognise that benefits and outcomes to both are often interdependent.

There are opportunities to support biodiversity through the sustainable production of traditional materials. For example, HES is helping the RSPB to enhance biodiversity on its Tay reserve through management of the reed there, which also provides material for thatching roofs.

There will be similar opportunities to support biodiversity and other outcomes through the production and protection of native thatch materials. HES will be investing in research over the next year into opportunities for the producing other critical thatching materials. Some of these materials are difficult to procure – such as marram grass and suitable types of straw.

We are also investigating longer-term materials needs for the historic environment. This includes opportunities for ‘heritage stands’ of native trees to support the long-term needs of the traditional built environment. This has the potential to bring added environmental and biodiversity benefits.

## How we can strengthen the character and heritage of our many different places

- NPF4 should recognise the Historic Environment Policy for Scotland as a key decision-making document for developments affecting the historic environment.
- NPF4 reinforces the strong policy direction that any development and use of land required is informed by a plan-led system underpinned by the policy principle of ‘the right development in the right place’.
- NPF4 should guide decision making that is balanced, seeking outcomes that protect and promote the historic environment, enhancing it where possible.

As Scotland’s historic environment strategy, [Our Place in Time](#) (OPiT) states the historic environment is part of our everyday lives. Scotland’s historic environment is intrinsic to our sense of place and strong cultural identity. It is diverse, but it tells the story of our shared past. It is important in its own terms, providing key evidence of the lives and creativity of our forebears. It also helps to create a sense of place, identity and physical and social wellbeing, and benefits the economy, civic participation, tourism and lifelong learning. It is dynamic and ever changing and that dynamism lies at the heart of the need for sound principles of stewardship.

NPF4 should ensure that the historic environment is protected, promoted and enhanced to ensure that those who live, work and visit Scotland to continue to gain real, and increasing, benefits from their historic environment.

The historic environment enhances our quality of life and is a hugely valuable social, cultural, economic and environmental resource. [Scotland’s Historic Environment Audit](#) found that 89% of adults strongly agreed or tended to agree that “it is important to me that heritage buildings, monuments and places are well looked after.” Good management maintains the quality of this resource and secures its benefits, making sure that nothing is lost without considering its value and exploring options for avoiding its loss. Cultural significance should be considered in order to manage change through national and local policies as well as other land use management systems. If a place has cultural significance or has the potential for important new discoveries, decision-makers need to consider this when making decisions. There may be opportunities to enhance the historic environment, for example increasing public access and appreciation of it which should be considered on a case by case basis.

We recommend that NPF4 recognises that in addition to being important in its own right, the historic environment is recognised for making a contribution to Scotland’s national identity and well-being. Good management of the historic environment can contribute to dealing with the climate emergency, delivering vibrant, empowering and resilient places to live, work and visit and it can also provide an economic stimulus through the skills and knowledge required to enable good stewardship of this important national asset. NPF4 must provide an appropriate policy framework to support the protection of Scotland’s internationally renowned and diverse historic environment to enable it to play its part in supporting and informing the next chapter in our nation’s story.

Whilst some parts of our historic environment are capable of use and adaptation such as the buildings we live, work in and visit. Others are finite and non-renewable such as the

archaeological assets in our upland landscapes which are under increasing pressure from the deployment of renewable energy developments, peatland restoration and other land-use changes. In all cases, decisions affecting them should ensure that its understanding and enjoyment are secured for present and future generations, taking a long-term view in the public interest. The [Historic Environment Policy for Scotland](#) (HEPS) sets out a number of principles for the recognition, care and sustainable management of the historic environment. It promotes a way of understanding the value of the historic environment which is inclusive and recognises different views. It also sets out a framework for managing change in the historic environment, where opportunities for enhancement are identified and mitigation put in place where harm is unavoidable. NPF4 should recognise HEPS as a key decision-making document for developments affecting the historic environment.

Effective management of the historic environment is a shared endeavour involving individuals and organisations who own, use, manage or care about heritage. People should be empowered to use their heritage to develop their communities and places in a sustainable way. We all need to work collaboratively to respond to the challenges and opportunities we are facing, to make sure the outcome is as fair as possible.

Throughout this response we have provided examples of how the historic environment can make a meaningful contribution to delivering the priorities identified for NPF4. It will be essential that NPF4 reinforces the strong policy direction that any development and use of land required is informed by a plan-led system underpinned by the policy principle of ‘the right development in the right place.’

We have provided a response to the SPP topic paper on [Valuing our Historic Environment in Annex B](#).

## 5. What infrastructure do we need to build to realise our long-term aspirations?

### What infrastructure we will need in the future

- NPF4 should adopt the findings of the Infrastructure Commission. We support recommendation 3 'making use of existing assets' to make sure we are making the best of existing historic infrastructure, supporting the skills and technologies that will facilitate this and challenging perceptions that replacement is often preferable to reuse.

We support the recommendations outlined in the [Key Findings Report](#) published earlier this year by the Infrastructure Commission. We support the infrastructure first principle outlined under recommendation 2 and particularly welcome and support recommendation 3 'Making most of existing assets'. This recognises that most of the underlying infrastructure that will be used in 30-years' time already exists today.

All categories of infrastructure – whether existing or new – can and should make a positive contribution to achieving inclusive growth and the transition to a net zero carbon economy, sustainable tourism and skills development.

There will always be the need for new infrastructure of various types. But it is increasingly important to make sure we are making the best of existing historic infrastructure. We must support the skills and technologies that will facilitate this, and challenge perceptions that replacement is preferable to reuse. The reuse, adaptation and renewal of existing infrastructure is key not only to delivering policy outcomes for the historic environment, but to support a circular economy and range of other sustainability objectives.

The [Historic Environment Policy for Scotland](#) acknowledges that some change is an inevitable part of the dynamic of the historic environment. How this is managed is the critical factor. It is vital to strike the right balance between the protection of our heritage and the need for new infrastructure and other development.

The planning system and other consenting regimes for infrastructure (such as those for roads and electricity generation) have to make this balance – both in specific cases and more strategically.

The way our historic assets and existing infrastructure are maintained and adapted to meet societal needs presents a number of opportunities for inclusive growth, regeneration and social cohesion. This must be considered together with the design and delivery of new infrastructure.

### How we can make better use of existing infrastructure capacity

- NPF4 should recognise the contribution that culture and our heritage can and do make to the circular economy, sustainable development, and various aspects of infrastructure maintenance and delivery.

We estimate there are around 450,000 traditional buildings in Scotland. This is one aspect and a small proportion of Scotland's historic assets. Our historic environment extends to include a wide range of structures including canals, communications equipment, railways, piers, bridges, civic buildings – and a great deal more. NPF4 should recognise this, and the contribution that culture and our heritage can and does make to the circular economy, sustainable development and various aspects of infrastructure maintenance and delivery.

Many historic assets provide a backdrop for our daily lives and are of special historic interest. They are of huge public value and have often provided key public services for generations. In the context of the climate emergency, it is increasingly important that our existing infrastructure assets are effectively and efficiently utilised, maintained and enhanced to net zero carbon readiness.

NPF4 should support the implementation of the recent Infrastructure Commission recommendations, promoting the value of a whole-life based approach to asset management. This must be key consideration in the creation of new infrastructure. There should be a strong presumption for reuse and repurposing over new build.

Scotland's historic environment is a dynamic yet finite resource. We know that proactive and innovative environmental stewardship is required now and in the future. In particular, the pressing challenges from our changing climate mean that the historic environment, which makes up a significant proportion of our existing infrastructure, must continue to adapt and develop longer-term resilience.

We would strongly support infrastructure renewal as being a key catalyst for investment, service delivery and community cohesion. Scotland's built environment and historic sites, places and infrastructure are fundamental to what makes places attractive to live and work in. They inspire investment in our people, communities and economy.



## ANNEX B

### Valuing the historic environment

We broadly support the proposed key objective of NPF4:

To support the understanding, protection and importance of the historic environment so that the cultural, social, environmental and economic value of our heritage continues to contribute to Scotland's well-being.

NPF4 must provide an appropriate policy framework to support the protection of Scotland's internationally renowned and diverse historic environment to enable it to play its part in supporting and informing the next chapter in our nation's story.

The historic environment is not only important in its own right. It makes a contribution to Scotland's national identity and well-being. This is acknowledged in [Our Place in Time](#), Scotland's strategy for the historic environment.

Good management of the historic environment can contribute to dealing with the climate emergency; it can help deliver vibrant, empowering and resilient places to live, work and visit; it can provide an economic stimulus through the skills and knowledge required to enable good stewardship of this important national asset.

#### Research on the adoption of SPP in LDPs

We note the recommendations of the Ironside Farrar Research Project report on the Adoption of Scottish Planning Policy (SPP) in Local Development Plans (LDPs). In general, the research found that policies under this heading in SPP worked well for plan making purposes. It also found that this topic area linked well with guidance prepared by Historic Environment Scotland.

The research also found that the policies in this area worked well for Development Management purposes. It noted that the policies provide a useful framework for the consideration of the historic environment in the overall planning balance.

There was not universal support for the current framework, and the research reports that some respondents found the historic environment policies in SPP difficult to apply. In particular, it found to issues around how conflicts should be addressed.

There is not enough detail given for us to be certain what this relates to. However, we suggest that in general where such conflicts arise these matters should be considered as part of the balance of interests that are considered on a case by case basis as part of the planning process. We would be happy to support the implementation of NPF4 with a programme of capacity building for planning authorities, to help address any skills gaps.

#### Are existing policies sufficient to safeguard Scotland's valuable historic environment assets and to manage potential conflicts with other interests?

We broadly support the continuation of asset specific policies in NPF4. These policies, which are set out in paragraphs 141–149 of SPP, provide a useful framework for decision-making. They have been tested in their current form as part of the planning process.

However, there are some areas where we can see that there is the potential for the improved operation of these policies. We have outlined these areas under the topic headings



'Scheduled monuments' and 'Enabling development'. We would be happy to provide input to support the drafting of policies to be included with NPF4.

### Scheduled monuments

There may be potential for the policy set out in paragraph 145 to operate more effectively. We are aware that some of the terminology, particularly 'integrity of setting' and 'exceptional circumstances' have been considered open to interpretation in some contexts. This can be a distraction in the decision-making process. Further work is needed in this area and we would be happy to support you in this. As part of this, we would welcome the opportunity to take part in discussions with other parties including DPEA and ALGAO.

### Enabling development

All options should be considered to allow the continued use, or secure reuse, of a listed building. The current policy, which is set out in paragraph 142, allows development to take place which would normally be contrary to planning policies to achieve a desired outcome – such as the repair and reuse of a listed building or asset.

It is important to retain a policy on enabling development. The quantity of development and impacts on significance and setting should also remain considerations.

We have published a short case study on [Greenlaw Town Hall](#), Scottish Borders where enabling development was successfully used to secure the repair of the A-listed building. This shows the value of enabling development. In this case, the enabling development was located on the edge of town and avoided any impact on the setting of the listed building. This was a relatively rare solution, spearheaded by the local authority, and will not always be an option.

### If not, what changes are needed?

As noted in the Ironside Farrar report, in 2019 the Historic Environment Policy for Scotland (HEPS) was adopted. Compared to its predecessor policies, HEPS has an increased emphasis on a holistic approach to decisions affecting the historic environment. HEPS is relevant to all parts of the historic environment.

### Policy principles

SPP currently makes provision for the protection and enhancement of all elements of the historic environment at paragraphs 137, 139 and 140. For new policies to achieve the proposed key objective of supporting the understanding, protection and importance of the historic environment, it will be critical that NPF4 retains these policy elements.

We recommend that this section of NPF4 is aligned with the language of HEPS. This would include referring to cultural significance rather than importance as in the second bullet of the existing paragraph 137.

### Scheduled monuments

As noted above, we believe that there may be potential for this policy to operate more effectively in future. We would be happy to provide support in reviewing this policy.

We recommend that any glossary definition of 'setting' aligns with the definition of setting for historic assets as stated in our [Managing Change Guidance on the topic](#). It is not helpful to have conflicting definitions of this term used, and this has created confusion in the past.



## Enabling development

The wording of existing policy means it is extremely difficult for a planning application for enabling development to be in full compliance. The policy states that enabling 'may be acceptable where it can be clearly shown to be the only means of preventing the loss of the asset and securing its long-term future'. It is difficult for an applicant to demonstrate that their proposals are the 'only means' – and therefore difficult for decision-makers to conclude this has been proved.

The 'only means' test often becomes a financial assessment, often contained in a viability assessment. However, the options considered in such assessments are limited and this approach does not allow for potential restoring purchasers to come forward.

The policy also requires that development should be the minimum necessary. This is also often presented as part of a viability assessment. As these assessments need to make certain assumptions, in terms of costs (including profits) and end value of a development, they will never be completely accurate and will become less so over time. This would mean the quantity of development would be more than is needed if values rise, or not enough to secure the future of the listed building if values fall. Financial assessments will always be a consideration, but they have limitations.

The last sentence of the existing policy presumes that development will preserve or enhance the character and setting of the historic asset. While the Greenlaw case study illustrates this is possible, it is not always realistic to expect no adverse impacts from enabling development – especially on setting.

The wording of any new policy should allow for greater flexibility depending on the circumstances of individual cases. Such flexibility could have unintended consequences – these must be considered and avoided.

The material forming part of an application should include the rationale for the enabling development and set out why other options have been discounted. It should also include a financial assessment with a detailed assessment of costs, including developer profit, as well as the likely value of the completed development. The figures should be verified by reviewing the assumptions and allowances within the financial assessment.

Any new enabling development policy in NPF4 should be consistent with the principles and policies within HEPS. The policies on managing change – HEP 2,3 and 4 – are most relevant.

We have looked at how these changes and additions might look in a new policy on enabling development. We suggest that there are various options to achieve this. We would be happy to discuss this with you and to provide support in drafting the policy provision for NPF4.

The first option we suggest is:

Development which would otherwise be contrary to planning policies should be acceptable if it allows the continued use, or reuse, of a historic asset. Enabling development should only be considered when other feasible alternatives have been discounted.

Information supporting enabling development applications should clearly justify the need for enabling development and the steps that have been taken to minimise interventions, avoiding or mitigating negative impacts on the listed

building and its setting. Opportunities for enhancing the historic asset and its setting should be explored where appropriate.

The second option is:

Where alternative solutions to retain or reuse a historic asset have been discounted, and its survival is threatened, development which would otherwise be contrary to planning policies may be allowed.

The need for enabling development to save the asset should be clearly justified, as should the attempts made to minimise interventions and avoid, or mitigate, negative impacts on both the historic asset and its setting. Opportunities for enhancement should be explored where appropriate.

We also suggest that the following points are key:

- Enabling development, if approved, should be securely tied to the reuse of the listed building through planning or other legal agreement.
- Enabling development is not a substitute for normal development funding, including borrowing.

We have identified three other points which should be considered.

SPP does not provide a definition of enabling development. This would be helpful as it is not always clear when the policy applies. The term ‘enabling development’ is now often used generally for cross-funding the repair of listed building.

Enabling development was originally used to mean a development that would normally be contrary to planning policy, such as housing in the countryside. The benefits of saving a historic asset can mean this presumption to refuse planning permission can be set aside. It is therefore confusing when this term is used in cases such as the redevelopment of an urban site, or a site allocated for development in a development plan, where the presumption is for development.

A new policy could explicitly cover the repair and/or restoration of other historic assets such as designed landscapes. A definition of historic assets could also be provided.

This is also an opportunity to include a requirement for marketing in the policy. This would allow for potential restoring owners to come forward. This may not be appropriate in all cases, so would require further consideration.

### Archaeology and other historic environment assets

In our experience, planning authorities place weight on translating paragraph 150 into Local Development Plan policy, creating policy provision for non-designated archaeological sites. Policy 151 is rarely translated in the same way. This means that there is often no robust policy provision for non-designated historic assets not considered archaeological in nature.

Any new policy should align with HEPS and the language that it uses. This would mean moving towards policy which directs appropriate change management and mitigation based on the cultural significance of the historic asset rather than the type of asset.

The following changes could support this approach:

- combining paragraphs 150 and 151 – taking a holistic approach to non-designated historic assets, rather than separating into archaeological sites and monuments and ‘other’ historic environment assets

- developing approach to mitigation set out in paragraph 151 – addressing mitigation in cases where in situ preservation is not possible
- removing the reference to ‘significant resources’ in paragraph 151 – the policy does not indicate how ‘significant’ should be defined in this context
- reducing or removing references to specific asset types – if necessary, the definition of historic assets set out in HEPS could be replicated here

We also suggest changing the subtitle of this section to ‘Non-designated historic environment assets’. The definition of historic environment assets set out in HEPS encompasses buildings, monuments, sites, places, areas or landscapes. This terminology encompasses all elements of the non-designated historic environment without placing emphasis on one ‘type’.

The policy could provide more robust direction on mitigation for impacts on non-designated historic assets not considered to be archaeological. Paragraph 150 currently provides a level of detail on mitigation of effects on archaeology that is not reflected in the policy on mitigation of effects on ‘other historic environment assets’ set out in paragraph 151.

The policy should emphasise more clearly the valuable role that non-designated historic assets play in good placemaking. This would support both HEPS and the Place Principle.

### How can NPF4 best complement existing historic environment legislation, strategies and guidance, including that from other national bodies?

NPF4 can support existing national level strategies by recognising the contribution that the historic environment makes. In addition to forming the unique character and identity of Scotland, it also delivers multiple benefits across the full range of priority areas – tackling the climate emergency, supporting wellbeing and addressing inequalities and enabling inclusive growth.

It is essential that NPF4 takes a holistic view of the environment to deliver across all of these priorities. This view is supported by the [A Culture Strategy for Scotland](#), which states:

Culture is central to the future wellbeing and prosperity of Scotland – cultural, social, economic and environmental.

Any definition of sustainability or sustainable development in NPF4 should therefore include culture as one of the pillars of the concept – along with environmental, social and economic considerations.

NPF4 will sit alongside HEPS, providing national level policy for the historic environment. It will be important for there to be a clear read between the two documents. The policies for the historic environment within NPF4 should therefore align with the language and terminology used in HEPS.

## Placemaking

The proposed key objective of NPF4 is:

To deliver sustainable, well-designed places and homes that meet the needs of people living in Scotland including, in particular, the housing needs for older people and disabled people. This will be done through a design-led approach which demonstrates the six qualities of successful places (distinctive, safe and pleasant, easy to move around, welcoming, adaptable, resource efficient).

We are content with this objective, which covers a lot of the themes we need to get right to create successful places where people and nature can thrive. The issue here is not about the principle of the NPF4, which is good. It is about ensuring that NPF4 and SPP will set a solid framework to allow for successful placemaking.

The public sector will have a key role to play in ensuring these objectives and policies are carried forward into day to day decision-making. Proactive partnership working will be crucial to deliver great places in the right locations – as opposed to letting the market decide where development happens.

### Does the current SPP Placemaking policy need to change – if so, in what way?

The current policy wording is well intended but could be stronger.

Under “Planning should direct the right development to the right place”, the two points below could benefit from changes:

- considering the reuse or re-development of brownfield land before new development takes place on greenfield sites;
- considering whether the permanent, temporary or advanced greening of all or some of a site could make a valuable contribution to green and open space networks, particularly where it is unlikely to be developed for some time, or is unsuitable for development due to its location or viability issues;

For the first of these points, “considering” is simply not strong enough. “Prioritise” should be used instead.

The [Scottish Land Commission’s report on Vacant and Derelict Land](#) shows us the negative impact of brownfield sites and vacant derelict land on the environment, and its impact on the perception of places and spaces by the neighbouring communities. The reuse of land should be made a priority rather than a simple consideration. The reuse of derelict land could make a major contribution to efforts to address climate change. It could also go a long way to addressing inequality in the quality of places.

There is an opportunity here to talk about the reuse of historic buildings. Keeping historic buildings in use has wider benefits as they contribute to their wider surroundings and community. They teach us about what people value in the places they live, work, and spend time in, and so they help us to build successful places.

For the second of these points, “considering” is also too weak. Greening should be a key priority. [Interreg Europe’s report on the benefits of green infrastructure, ‘health, wealth and happiness’](#) shows the fantastic environmental, social and economic outcomes that green infrastructure can have. It is at the core of good placemaking.



## What is the most effective way for NPF4 to give high level support for placemaking principles that integrate with other policy documents, such as [Creating Places: a policy statement on architecture and place for Scotland](#)?

The importance of addressing the needs of communities holistically is recognised more and more. Considering issues of the local economy, physical infrastructure and the cultural and social aspects of place together, rather than in isolation, can lead to better multiple outcomes.

Improvements to housing and the physical environment can reduce crime rates; feeling connected to your community can lead to better educational attainment; participating in community-led cultural activities can reduce social isolation and improve health and wellbeing.

Where possible, policy principles throughout SPP should continue to be cross referenced in all the relevant detailed guidance. This adds weight to the policy requirement.

After this COVID-19 crisis, policymakers, political leaders, professionals, businesses, communities will have to come together in a more proactive way to ensure a collaborative approach to our response in dealing with health and economic impacts of Covid-19 as well as the climate emergency. This is advocated by [The Place Principle](#).

The Place Principle argues that everyone responsible for providing services and looking after assets in a place should work and plan together and with local communities. This process improves the lives of people, supports inclusive and sustainable economic growth and creates more successful places. The process can be supported by the use of the [Place Standard Tool](#), which can help the local communities to define what the priorities for their local areas should be.

This COVID-19 crisis has shown us dramatically that it is the resilience of people and communities that embodies the strength of a neighbourhood, a town, a city. A new era of governance is needed that focuses on empowering community organisations to do things for themselves – and to create places for themselves. It is important to reference the power of [Local Place Plans](#) and their importance for placemaking.

At HES we have been working on helping communities to identify what heritage is important to them. Heritage helps us feel connected. It might be to a community, a place, or a shared past. It reflects different viewpoints across cultures and generations and is key to local distinctiveness and identity. Heritage can also inspire creativity. These all combined are great ingredients for successful placemaking.

How can national planning policies best support the delivery of existing core placemaking policies in development management whilst recognising the need for local flexibility? The key is to ensure that the development happens where it was planned for in the Local Development Plan. Monitoring development on a piecemeal basis disregards the placemaking policies. This would make the development management's task to assess proposals much easier.

A good example of this is the provision of green infrastructure. Policymakers in Europe are increasingly recognising the importance of green infrastructure in urban and rural areas as an effective measure in mitigating the negative effects of climate change and in contributing to initiatives to improve the 'quality of life' across the board.

There is now increasing recognition that investing in green infrastructure generates:

- **environmental outcomes** – factors like improved air quality and associated improvements to health
- **social outcomes** – changes like increased community engagement and associated improvements in mental health
- **economic outcomes** – changes which improve the ‘sense of place’ or ‘attractiveness’ of an area and associated increases in property values

Of crucial importance is the management of these community assets in the long term. It is often possible to create networks of green space and other assets when a development is first built. But if these are not well managed they will lose the functionality that they were designed to provide.

The quality of that green infrastructure will be crucial if it is to make a real impact to reduce the impact of climate change. The quality should be considered in terms of both the quantity and also how it connects to existing green and blue spaces.

Delivering green and blue infrastructure as an integral element of place – from national to site level. Investment decisions for blue-green infrastructure should to be closely aligned to the needs of communities and integrated with wider place objectives, using a place-based approach.

### How can placemaking policies support other policies, such as housing and green infrastructure, to meet the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people?

Placemaking should be the glue that holds it all together. There has to be clear guidance about ensuring that the right development happens in the right places. This applies to green infrastructure and to housing for an ageing population.

[Architecture and Design Scotland's work on Age Friendly Places](#) considers the topic of housing for an ageing population. We need a proactive approach to expanding homes for the elderly. Working with disabled people's organisations and building standards to innovate and embed accessible housing should be a priority. Historic buildings that are key to the identity of places can change through the consent regimes to allow for more adaptive housing.

Placemaking policies should advocate for a programme of innovative housing delivery that is progressed in a way that is really aligned to local development plans. Planning needs to be more responsive to the diverse housing needs of Scotland's current and future population. This could drive a step change in affordable housing provision and drive forward alternative models including co-housing, self-build, private rented sector, off-site construction energy and energy efficient homes.

### Does the climate change emergency mean that the policy needs strengthening or revision?

This should be our top priority. The review of SPP is an opportunity to promote effective measures in mitigating the negative effects of climate change and in contributing to initiatives to improve the quality of life across the board.

As noted above in the first question, the greening of spaces and the strategic placing of green and blue infrastructure and reuse of derelict land and buildings should be a priority. These contribute to addressing climate change.



## Is there scope to make more of this policy area in order to encourage planning to actively enable the delivery of high quality development?

Yes. Placemaking should be the core policy area and all the subjects could stem from this topic. It is only by starting with a priority for making places and spaces that contribute to people's wellbeing and are sustainable for the planet that will we see high quality developments that stand the test of time.

Successful placemaking will come from developing planning interventions that will compel people to naturally choose what is best for their city or town, best for society, and best for them. It will make what's best also the easiest, most enjoyable, and most fun option.

At the moment we have a market driven approach to designing places; an approach that puts corporate profit in front of public interest by effectively delegating place making to the private sector. If we are serious about thinking ahead to 2050 then this needs to change.

The real game changer would be to embed a new approach to appraising public expenditure – one prioritises wellbeing effects on our communities, and positive impacts on our environment, over financial returns.





## Delivering Electricity

We broadly support the proposed key objectives of NPF4:

To maximise the contribution of renewable electricity generation to meeting our net zero target in a sustainable way.

We recommend that NPF4 takes a whole system, infrastructure first approach to a low carbon energy future.

### Is the existing policy approach fit for purpose? What aspects need to change?

We recognise the Scottish Government's commitment to supporting the continued growth of the renewable energy sector as part of tackling climate change. However, we have concerns about the potential impact of ever larger wind turbines on Scotland's historic environment.

Turbines of increasing heights have the potential to have a significant impact on historic assets over greater distances. This can impact on our ability to understand, appreciate and experience them and therefore significantly affect their cultural significance.

The Scottish Government must ensure that the planning system is flexible enough to direct the right development to the right place. This will support the ongoing delivery of onshore wind energy developments and of the cross-cutting aims of [Our Place in Time](#) – the historic environment strategy for Scotland – and [A Culture Strategy for Scotland](#).

We support the existing policy approach stated in paragraph 28 of SPP of the right development in the right place not development at all costs. This is largely delivered through the existing policy approach expressed in SPP. NPF4 should continue to promote this as the over-riding principle. It will need to adopt a whole systems approach to ensure that the full range of renewable energy technologies is considered. It should also put greater emphasis on local and off-grid energy (electricity and heat) where appropriate – this will support a just transition to a low carbon energy system.

To achieve this, we believe that it is critical that NPF4 takes a plan-led approach to planning for renewable energy. Spatial frameworks for onshore wind farms, including those to be repowered, should be based on an infrastructure first approach. This would include giving priority to areas where grid connections are already available, which would support the deployment of this technology while balancing the need for environmental protection.

Our role in the planning system means that we see and comment on any major wind energy development in Scotland. We have identified an issue with how the historic environment is factored in to the development of onshore wind proposals. This often does not happen at an early enough stage.

This means that we are having to object to proposals which raise issues of national interest for the historic environment. In many cases this is avoidable and could be resolved as part of the site selection process. In other cases, the level of impact could be reduced through the design process, but we are finding that this does not happen until we object. It is not clear whether this is due to an issue with the existing policy framework or with guidance. We would be happy to discuss this further.



## Table for spatial frameworks

NPF4 should strengthen protection for our internationally important historic assets. World Heritage Sites (WHS) should be moved from Group 2 of the table for spatial frameworks in SPP to Group 1.

For most of the WHS in Scotland there is a strong landscape context which puts them on a par with National Scenic Areas. Historic Environment Scotland, UNESCO and the advisory bodies to the World Heritage Convention (ICOMOS, IUCN and ICCROM) recognise these sites globally as ‘the best of the best’ and worthy of the highest level of protection.

The most recent decision from Scottish Government on New Lanark WHS (Hyndford Quarry) took a strong line on impacts on WHS. It would be helpful for this to be reflected in policy.

## How can national planning policies support future repowering of wind farms?

NPF4 should encourage greater collaborative working between the renewable energy sector, communities, planning authorities and statutory consultees. We would like to see a more strategic, plan-led approach to the repowering of wind farms.

We recommend that NPF4 puts in place a requirement for spatial frameworks. Frameworks should include wind farms that are coming to the end of their operational lives. This should be tied in with an infrastructure first approach to grid connections.

## What other technologies need to be addressed by the policy?

NPF4 needs to take a more ambitious approach to new technologies to increase the mix of renewable energy types in Scotland. HES has been involved with East Lothian Council’s proposals for a new development at Blindwells, and we have welcomed their holistic approach to planning for this new settlement. As part of this, the Council is exploring mine water district heating schemes.

The Council has noted that water district heating schemes have already been successfully developed at several locations. At Heerlen in the Netherlands, a scheme has been operating since 2008, supplying heat to 500,000m<sup>2</sup> of commercial and residential buildings. Closer to home, open loop ground source heat schemes have been developed for small residential developments serving 16 dwellings in Shettleston, Glasgow and 18 dwellings in Lumphinnans, Fife.

## How can NPF4 support strategic energy infrastructure (including generation, storage, transmission and distribution networks)?

NPF4 should take an infrastructure first approach to strategic energy infrastructure. It should set a policy framework which prioritises areas for development where grid connections to renewable energy schemes are available. The Scottish Government should therefore consider including the transmission companies as statutory consultees for new renewable energy development proposals.

## How can NPF4 help deliver the aims of the Energy Strategy?

NPF4 can help to deliver the aims of the Energy Strategy by taking the whole systems approach to planning for delivering electricity which is advocated in the strategy.



Specifically, the policy framework in NPF4 should take an approach which focuses on:

- **reducing demand** – encouraging behaviour change and incentivisation of investment decisions
- **increasing energy efficiency** – we have discussed energy efficiency in relation to traditional buildings under the final heading in this paper
- **meeting residual need from green technologies** – following the principle of a plan-led system to ensure that energy needs are met by locating the right development in the right place

### Meeting residual need

We support the current approach to low carbon, sustainable inclusive growth. We recognise the need to deploy a range of renewable energy technologies in order to achieve this ambition. Meeting residual need should take an infrastructure first approach, particularly on onshore renewables. Areas where grid connections are available should be the priority for such development.

The current framework broadly achieves its aim of ensuring the right development in the right place, with appropriate safeguards to protect our environmental resources. This includes the historic environment for which Scotland is internationally renowned.

We welcome and support the recognition in the [Onshore Wind Policy Statement](#) that there are competing and complementary objectives of land-use planning which are relevant to achieving a net zero carbon economy on a case by case basis. NPF4 should strengthen the case for implementing these principles, and set the framework for action.

### How do we balance renewable energy ambitions with the need to protect our natural environmental assets? (e.g. Wild land/Landscape)?

Renewable energy proposals impact on more than simply 'natural' assets – wild land and Scotland's landscape are both products of the influence of people over time. To balance ambitions to achieve a net zero carbon and to protect Scotland's high-quality environmental assets, NPF4 must strengthen the existing policy framework of the right development in the right place.

Developers must be bound by the requirement, as stated in the [Energy Strategy](#) and the [Onshore Wind Policy Statement](#), that proposals for onshore wind, including the repowering of existing sites, must be accompanied by 'appropriate, case by case assessment of their effects and impacts'. The historic environment is one of Scotland's most valuable assets and must be a consideration for such projects.

### How can national planning policies support planning for interdependencies between energy networks (e.g. electricity and heat)?

NPF4 should take a public sector plan-led approach to support planning for energy networks based on the infrastructure first principle. The focus should not just be on new renewable electricity developments, but also where new forms of heating networks might be needed or proposed.

### How can national planning policies support delivering energy efficiency and the recovery of energy that would be otherwise wasted?

The drive towards improving energy efficiency in homes needs to be handled carefully. Traditional buildings must still be able to cope with hotter, drier summers and warmer, wetter winters without overheating. Traditional buildings were designed to be passively ventilated.

The sensitive reinstatement or refurbishment of passive ventilation features can contribute to community resilience and wellbeing. There is more information on traditional buildings, and how we use this term, on [the traditional buildings page of our website](#).

Several of our recent HES winners of the RIAS Conservation and Climate Change award have utilised passive ventilation within their schemes. [The Hawick Distillery](#) and [the Garment Factory](#), a refurbished office block in Glasgow, are both used as [case studies](#) in our [Managing Change in the Historic Environment](#) guidance series.

In addition to implementing measures for energy efficiency, NPF4 should encourage behaviour change to reduce demand for energy. Ultimately this will rely heavily on behaviours and mechanisms outside the planning system. However, some measures could be implemented in relation to the construction sector. This could reduce unnecessary demolitions, and lead to more reuse of sustainable building materials where demolition has been accepted.

NPF4 should influence behaviour in respect of land-use decisions and should follow the recommendations of the Infrastructure Commission to take an infrastructure first approach. It should prioritise care and maintenance of existing assets.

Well maintained buildings are more energy efficient, and more resilient to the impacts of climate change. NPF4 could support local, subsidised schemes such as the [Traditional Buildings Health Check](#) (TBHC) which was a pilot project which ran from 2013 – 2018.

TBHC was initiated by HESs in partnership with Construction Industry Training Board (CITB) Scotland, who encourage property owners to take a more proactive approach to maintaining their buildings. Of 245 member properties and 144 buildings inspected, it found that:

- Virtually all buildings inspected had some elements in need of repair, with 88% requiring work in the next 12 months.
- Repair works were commissioned for an estimated 120 member properties.
- The total estimated spend by owners on their properties £1,273,389.
- Members joined for a range of reasons, including to find out if there were problems that they were unaware of, and to seek professional advice.
- TBHC reporting supported members to carry out their intervention appropriately and a number of members carried out additional work as a result of the TBHC report. In general, owners felt more confident commissioning repair work once they fully understood the condition of their property.
- Discussions with members revealed additional causes of disrepair. These included a lack of property owner knowledge and insufficient numbers of skilled contractors which resulted in a mix of inactivity and low quality, poorly executed repairs.

Traditional forms of construction are often highly effective in using low carbon materials and having low operational energy. They are designed to be well ventilated and can use locally sourced skills and long lifespan materials.

More than 85% of the building stock that will exist in the year 2050 is already built. Half of all dwellings in the UK are more than 50 years old, and a fifth are more than 100 years old. Typically, buildings experience a number of refurbishments throughout their life, with a major refurbishment every 20 to 30 years. These refurbishments and retrofits represent an opportunity to reduce carbon emissions through refreshing a building's fabric and services equipment. The benefits of applying traditional techniques is clear from our existing building stock.



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

Historic and traditional buildings and their designation are not a barrier to change. They enable sustainable development which can help in the creation of successful, vibrant places. Energy efficiency and adaptation can be achieved through sensitive retrofit of existing buildings, including traditional/historic buildings. There is a wealth of support and guidance on this available from HES and other organisations including city heritage trusts.



## Rural development

We support the key objective of NPF4:

To promote rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

There should be a clear presumption that any new rural development will be located where it can help to sustain existing communities most effectively. Development should first focus on the use of existing buildings, which make an important contribution to the character and quality of existing places.

### How can NPF policy criteria most effectively contribute to the Planning Act outcome of increasing the population of our rural areas, and in consideration of resettling rural areas that have become depopulated?

For rural living to be sustainable, communities must have:

- diverse economic opportunities
- good quality housing
- access to services via good public transport links and active travel routes

To sustain communities in rural areas, development must focus on existing settlements where possible. This ensures the viability and vibrancy of existing town centres and smaller settlements; it maintains easy access to services like schools, healthcare and shops; it minimises the need for new infrastructure.

### Scottish Planning Policy takes a differentiated approach to rural planning policy and distinguishes between three main types of rural areas based on their accessibility and degree of pressure for development. Since SPP was published, classifications have evolved, for example on sparsely populated areas. How should policy criteria be framed to recognise the needs of different types of rural areas?

An alternative to a differentiated approach would be a location-based approach. This would focus on:

- the place and its character
- the social and economic need for housing in that location
- access to transport and services

Some settlements may be closer to a service hub in a neighbouring local authority than in their own area. Sharing services across local authority boundaries would provide better support to these communities. NPF4 should frame policy criteria to encourage this approach.

### What policy criteria is needed to support local businesses, including agricultural and land-based ones, to develop and diversify, taking into account the changing face of the rural economy?

One approach would be to replace the policy suite for rural development with one overarching policy aim: to sustain rural communities. This would be supported by a presumption that local and national bodies will work in partnership towards this aim.

For many people living in rural areas, part of the appeal of their area is the historic and natural environment. Tourism is an economic driver in many rural areas, and for most visitors the built and natural heritage is a major draw. It is therefore important that the historic environment continues to be carefully considered when planning new development.

The stewardship of Scotland's historic and natural environment should be a key consideration when planning sustainable places. Our approach to this is set out in the [Historic Environment Policy for Scotland](#) (HEPS). HEPS sets out a framework for decision-making rather than presenting a detailed and prescriptive approach. We believe that this will support sustainable rural development which is also attractive and characterful.

We support recommendation 12 of the [Rural Planning to 2050](#) report which states:

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

### What additional policy criteria is needed to support sustainable rural growth, for example through small-scale innovation at local level, given the likely challenges rural communities and economies will face as a result of changing economic climates?

New build is often promoted as the solution to the need for housing. It is presented as cheaper, easier, quicker and more energy-efficient than renovation.

This presumption needs to be challenged. Traditional buildings in towns and countryside are essential to the character of their place. Policy must ensure that their continued use, adaptation and re-use is always prioritised over new build.

NPF4 should provide the framework for a shift in the approach to rural housing. We recommend the development of strategies and programmes for the adaptation of our existing buildings and places. This will need to be underpinned by close engagement with the heritage sector. We have developed the HEPS and published detailed guidance on the [Use and Adaptation of Listed Buildings](#) with the aim of supporting works to adapt historic buildings.

There is the potential to incentivise renovation – perhaps by off-setting some of the financial advantages of building new. One option would be to reduce Council Tax for the years following renovation.

The public sector should take positive steps to lead and enable the delivery of housing that makes positive use of our existing buildings and places. This should be driven by national policy for the re-use and adaptation of our existing buildings. Brownfield sites and vacant and derelict land should always be the priority for housing delivery.

We encourage the public sector to explore models of sharing the financial risks of restoring our historic buildings and places for housing delivery. This may be through grant funding or models of Public Interest Led Development.

### What policy criteria are needed to facilitate growth in the tourism sector in a way that is sustainable, particularly where activities will help support and sustain communities in rural areas?

NPF4 should encourage the development of tourist strategies for all local authority areas, either individually or in partnership with other authorities.



Increased tourism can bring additional pressure to rural and island communities. We must make sure that these communities are resilient enough to deal with mass tourism without eroding the very thing that draws people to Scotland. We welcome the [Rural Tourism Infrastructure Fund](#) (RTIF), which has been put in place to alleviate pressure on infrastructure and negative impacts on some local communities.

[Doune Castle](#) has seen a dramatic increase in visitor numbers as a result of featuring in a number of successful TV series, including as a main filming location in *Outlander*. We have been working in partnership with Stirling Council and Kilmadock Development Trust to find ways to encourage visitors to the castle to explore the wider village, benefitting local businesses. As part of this, an award from the fund will help to deliver improved paths and facilities.

Based on the experience of our involvement with projects under RTIF, we would support a more strategic, joined up approach to planning for tourism – working in partnership with local authorities and other relevant parties. We think there is an important role for planning services in this approach. Services could co-ordinate action to ensure that there is infrastructure to support increased tourism, whilst protecting the internationally renowned heritage assets that draw people to Scotland.

### What is the best way to balance demand for tourist accommodation with the need to ensure that there is adequate and appropriate housing for rural populations?

Building new homes is not always the solution to housing needs; opportunities to reuse traditional buildings should always be considered as part of the solution.

A whole place approach to providing land and housing for rural populations would support better outcomes for many communities. This could balance the holiday letting industry, and the economic benefits it brings, with the needs of local communities, and identify areas where housing is the priority. Local authorities will need to work with housing associations and others to ensure that supply meets demand in areas where there is a shortage.

### SPP recognises that rural exceptions policies can be used to support sites for affordable housing that would not normally be used for housing. What more can be done to recognise the transformational role of housing in relation to the wider rural economy and the need to deliver untapped housing demand?

NPF4 should encourage renovation and reuse of empty houses. This will help to deliver sustainable housing and to create successful places. People often assume that reuse is much more expensive than new build, but that is not always true. We would like to work with the housing sector to identify cost-efficient and effective ways of to do this.





## Town Centres

We broadly agree with the proposed key objective of NPF4:

To ensure that planning policies recognise and address the challenges facing town centres so that they are better able to adapt and be vibrant, creative, enterprising and accessible places to live, work and visit.

The impact of policy and individual decision-making on town centres has been well-understood and evidenced for many years. NPF4 must provide clear and unambiguous direction by emphasising the social, cultural, environmental and economic value of our historic town centres. It must ensure that the impact of a range of decisions on town centres is understood and by re-stating the Town Centre First Principle.

### What are the challenges facing town centres in the short and long term and are existing policies sufficient to support likely change and adaptation?

Town centres across Scotland, from historic centres to modern centres, have traditionally been the focus of retail, leisure and commerce. They have been the heart, hub and gathering space for the communities they service.

Perhaps the main challenge facing town centres is changing shopping habits and patterns. This includes competition from out-of-town retail parks and the huge shift to online shopping. This has been accelerated by the current COVID-19 pandemic.

As retail units, banks, post offices and other businesses move their services online, there is less reason to go into town centres. Shops are boarded up and buildings are no longer maintained. Town centres become less attractive places for locals and visitors to spend time.

Many town centres have struggled to adapt and repurpose when demand for traditional high street retail and commercial services drops off.

Existing policies may not be enough to support change and adaptation on the scale we now need. Many town centres are still in decline. Online shopping has and will continue to increase. Many out-of-town retail centres have expanded their retail, food and drink and entertainment offerings.

Out of town shopping will always have a role to play, but it is dependent on car-based travel. In a net zero carbon economy, cars will not be central to our lives as they currently are. Town and city centres are much better placed to provide a lower-carbon shopping offer. They also offer a characterful place to shop, work and live.

The main challenge is to identify ways of working in partnership with communities, owners, planners, service providers to identify what a town centre could offer. This might be a mix of residential, office, education, workshops, public services, social enterprise and markets selling local produce. It will likely include retail, food and drink outlets and entertainment.

We need to work together to figure out how this can be done in a way that provides units with suitable accommodation and affordable rents for smaller businesses. [The Place Standard](#) is an excellent tool for framing conversations to define the current situation and think about opportunities and visions.



## Cultural and social activities are recognised as an important indicator when considering town centre vibrancy. Is existing policy and work on the Agent of Change sufficient in supporting the contribution that these activities make to the evening / night-time economy, and changing roles for town centres?

Planning has an important role to play here. If an aim of town centre regeneration is to have more people living in the centre of towns but also to attract more businesses directed at the evening/night-time economy, the needs of residents and business communities to be balanced. Cultural and social uses are vital to the long-term viability of hundreds of our most valued historic buildings.

The agent of change principle is very welcome, but it has limitations. Its focus is on new development, and issues will always arise as a result of ongoing activity and minor changes to existing uses. It may also be limited in how it can deal with the variety and complexity of a successful town or city.

For example, the impact on a community may derive from people heading to or leaving a venue and affect more than an immediate neighbourhood. If we want to promote town centre living to a wider range of the community including families, we will need to consider how and when noise reduction can be introduced to more existing buildings where necessary. We must make sure that the agent of change principle does not make the development of existing buildings less viable.

We need a more dynamic approach to community involvement if we are going to involve communities effectively in decision-making. It is vital that they have a voice in how their town centres are used – especially if we agree that one objective is to encourage more city-centre living.

## What issues are shared across all town centres and therefore suitable for inclusion in a national policy, and what matters are more likely to require locally driven policies and approaches?

Issues shared by town centres and suitable for a national approach include:

- **vacant buildings** – This includes buildings that are underused and poorly maintained, and gap sites. They impact on the perception of a town and, by extension, on viability.
- **competition from other centres** – This includes out-of-town shopping and commercial centres and online shopping and commerce.
- **connectivity** – Town centres must have adequate public transport and access to car parking for those who need it.
- **flexibility** – We need to be more flexible about use classes and changes in use, such as live work units.
- **perception of existing buildings** – These are often seen as being inflexible and unable to adapt to other uses.
- **expense** – The costs involved in maintaining and adapting buildings, including historic and listed buildings which may have been poorly maintained do not always compare well with the ease of a unit within an out of town development. We have said more about this under the heading [VAT](#), below.)
- **business rates and rents** – These can be higher in town centres – and there are also additional costs for customers such as car parking.
- **green spaces** – It should be a priority in all town centres to make sure that there is enough access to open and green spaces.

The solutions to these issues will be community dependent and place dependent. They will need to be flexible and to take account of relevant local circumstances. This will ensure that town centre living and working is an attractive, affordable and viable option.

### Local policies, decision-making and approaches

Understanding how communities and visitors currently use town centres and how they would like to use them will be important in shaping policies. Similarly, understanding the significance of individual places and the needs of local communities is key to informing change that maintains character and creates attractive places.

We should not just consider towns on an individual basis – it is also important to take a strategic approach. This should look at what different towns offer on a regional basis, their individual strengths, and links between them. Several town centres have successfully remarketed themselves or played on existing strengths. Wigtown is now known as Scotland's National Book Town, and Kirkcudbright's Artists' Town is a huge part of its identity regionally and nationally.

A clear national direction can ensure that the town centre impact of individual planning decisions is more clearly understood at a local level. It will ensure that local policies are framed to ensure the sustainability of town centres. Councils have an important role to play in concentrating their offices and public-facing facilities within town centre locations. Other public or semi-public uses, such as schools, health centres, community centres and offices can add to the vitality and footfall in town centres – they should be encouraged.

There are encouraging signs. At HES we give an annual award for conservation and climate change, as part of the RIAS Annual awards. Several of our winners have involved local authorities reusing and repurposing historic buildings within a town centre. These include the [Spiers Centre](#) in Alloa, where category A listed former swimming baths were converted into the town's library, archive, Registrar's Office and council hub. A more recent example is [West Dunbartonshire's new Council offices](#) built behind a retained listed façade in Dumbarton's town centre.

Other winners have included the South Beach Medical Centre in Ardrossan and last year's winner, a commercial [Whisky Distillery in Hawick's town centre](#). These have all provided valuable employment opportunities and increased vitality and footfall within town centres with specific problems.

### Access to National-level funding

HES can offer grant of up to £2 million to support heritage-focussed community and economic growth projects within conservation areas across Scotland through the [Conservation Area Regeneration Scheme](#) (CARS). CARS has been in operation since 2007 with over £40 million awarded to date. [Round 7](#) of CARS (2017-2022) awarded just over £4 million is funding schemes in Aberdeen, Dunoon, Rothesay, Cockenzie, Tranent and Jedburgh.

The CARS scheme is focussed on town centres. It assists many properties directly and can also help additional funding from other sources to be obtained. As well as offering grants to repair buildings, the CARS scheme helps to improve streetscape, encourages new uses for empty buildings and replaces unsightly shopfronts with traditional examples. The CARS scheme provides much needed assistance with the additional costs in dealing with existing buildings. We have said more about these costs below.

The grant scheme assists in repairs that can slowly, building by building, change the perception of a town centre. This can encourage additional investment. Many recent grant programmes have focussed on town centres with many of the problems identified above.

We also run a building focussed grant programme. The Building Repair Grant has assisted the repair and reuse of many listed buildings in town centre locations, including several of the examples noted above. Investment in major regeneration projects and landmark buildings like the new Paisley Museum, the [Ingram Enterprise Centre in Kilmarnock](#) and Dalkeith's former Corn Exchange increase footfall and provide employment as well as destinations for tourism and visitors.

## VAT

Nationally, the issue of Value Added Tax can have a huge effect on town centres. There is a 20% rate on the repair, maintenance and refurbishment of existing buildings. New build developments are tax free.

This is a disincentive to owners and developers undertaking repairs, maintenance and most forms of adaption and refurbishment work in town centres. The 20% rate also plays against wider priorities for ensuring resource efficiency and environmental sustainability.

Development within town centres may already have additional costs and restrictions over and above greenfield development. They might have restrictions on access, noise and construction hours. The additional VAT payable on the repair and refurbishment of town centre buildings gives them an extra disadvantage.

We strongly recommend that tax structures are reviewed. They should give parity for the use and adaptation of our existing building stock. Already in the UK there are reduced rates of VAT (payable at 5%) for certain works, including the installation of energy efficiency products, refurbishing long-empty homes, and the residential conversion of certain property types. A zero or reduced rate for works to town centre buildings would certainly assist the town centre first principle. Ultimately, we would like to see a reduced rate for all works of repair and maintenance to existing buildings.

## Non-domestic (business) rates

The cost of business rates for town centre properties is also a major issue. There are currently opportunities to offer reductions, including the Fresh Start scheme, which offers a rates holiday for previously long-term unoccupied buildings and those with lower rental values. There are also reduced rates for empty buildings and unused listed buildings currently have 100% relief from rates.

Unfortunately, when buildings are left empty there is often less motivation for owners to repair and maintain them. This can make their eventual repair and reuse more expensive and more complicated. Reduced rates should therefore not support buildings being left empty for long periods of time.

An extension of rate assistance schemes specifically for properties in town centre locations could assist town centre investment. This would be most effective alongside new incentives for the repair and reuse of existing buildings that are standing empty. These could include reduced rates of VAT and grants for repair and enhancement.



## Can more be done to ensure that town centres are accessible, connected and safe places for all?

Yes. Using the [Place Principle](#) for conversations around regeneration is a good starting point. Many town centres have become separated from their public transport entry points. Looking at original street patterns and links to established routes can provide solutions to linking bus and rail stations with town centres when place planning. Links and routes within a town centre can often be reopened or repurposed to serve existing and new amenities.

We need parking in town centres so that living and shopping in them is attractive to people of all abilities. But this must be balanced against other needs. Active travel routes should be considered and, in most circumstances, prioritised over car parking. This will encourage active travel and improve town centre air quality. There may be many ways to do this that bring old paths and infrastructure back into use – such as repurposing of disused rail routes.

Derelict, boarded-up, or poorly maintained buildings and sites can also give off a perception of decline which will appear unsafe to some people. Maintaining buildings and keeping them in use should be a priority.

New development within a town centre should be designed to accommodate safe walking and cycling routes. Personal safety within the centre should be considered at an early stage in any new development. This should include making sure that lighting is adequate and routeways are overlooked.

Increasing the number of people living in town centres will increase safety through passive surveillance. This is especially at quieter times of the day like early morning and evenings. Providing more housing within town centres has the opportunity to improve accessibility, connectivity and safety.

## The interaction between the town centre first approach and the wider place principle and any implications that might have for policy?

We believe there is no contradiction between the aims of the town centre first approach and those of the Place Principle. We support a collaborative approach between stakeholders and the community in looking at the future of Scotland's town centres.

While the Town Centre First principle has had some success, progress has been slow. There are still examples of new out of town shopping centres being allocated within Local Development Plans (LDP). There are also cases where such proposals have been approved at application stage, even when they are not part of the spatial strategy in the LDP. This highlights the need for NPF4 to reinforce the town centres first approach.

In order to compete with online retail and out of town shopping, policies need to positively support the change needed in town centres. Centres must be able to provide an added dimension to their offer and a different experience to out of town retail.

Town centres often have a core of historic and characterful building and streetscapes, and this can be their unique selling point. The future of town centres is likely to involve a move away from retail units, which historically have formed the bulk of town centre commerce. We are likely to see a mix of service sector businesses that cannot be easily replicated online: smaller retailers, food and drink offers, local produce, galleries, gift shops, beauty and therapy salons. Along with this, there should be encouragement for combined living and working accommodation within a town centre as well as housing and offices.



The place principle encourages a collaborative approach, working with business leaders, funders the local community to encourage the change needed.

### The role of towns in helping address the climate emergency/support ambitions for Scotland to become a net zero society by 2045?

We have identified four key ways in which town centres can support a move towards a net zero society:

- Town centre living in multi-unit buildings is sustainable for fuel use.
- Towns provide good access to public transport and active travel infrastructure, proximity to workplaces and services so living in town centres reduces the need for travel and car use.
- Towns provide access to green space, which is important for public health and successful placemaking and contributes to ambitions for Scotland to become a net zero society by 2045.
- Reuse of buildings is more sustainable than building new and most buildings can be repurposed. Even if this is more expensive initially than new build, this should be balanced with the contribution to Scotland becoming a net zero society by 2045.



## Sustainability

We broadly support the proposed key objective of NPF4:

To ensure that the planning system supports the Scottish Government's purpose of focussing on creating a more successful country with opportunities for all of Scotland to flourish through increased wellbeing, and sustainable and inclusive economic growth which is achieved with a view to achieving net-zero emissions by 2045.

### Should the presumption in favour of sustainable development remain a component of the NPF given the move to 10-year development plan preparation and the new statutory role of national planning policy?

Yes. There is the opportunity to clearly define the term 'sustainable development' to ensure subsequent development plans respond to this.

### The merits of maintaining an overarching policy on sustainability and whether it needs to be changed as a result of the climate emergency?

The concept of sustainability in the long-term needs to acknowledge the immediate nature of the climate emergency. To be sustainable, our built environment needs to be adaptable and resilient. There must be a shift towards a culture of ongoing care and maintenance of existing buildings. This will reduce the demand for additional and often unsustainable resources for new buildings.

The stewardship of Scotland's historic and natural environment should be a key consideration when planning sustainable places. Our approach to this is set out in the [Historic Environment Policy for Scotland](#) (HEPS). HEPS sets out a framework for decision-making rather than presenting a detailed and prescriptive approach. We believe that this will support sustainable rural development which is also attractive and characterful.

### How should any sustainability policy be presented in NPF4 to ensure it can be easily and consistently interpreted and applied?

There is merit in presenting an overarching policy but culture should form part of the definition of sustainability. We would suggest that the planning system should support economically, environmentally, culturally and socially responsible places.

Planning needs to set the framework for sustainable management of our historic environment. It is a source of rewarding jobs with a low carbon footprint. Working in the historic environment can keep traditional skills alive and support the ongoing care and maintenance of our historic assets. Recent events have heightened the need for NPF4 to prioritise a plan-led system which allocates appropriate resources to support a green recovery.

### Does 'sustainability' remain an appropriate catch-all outcome for increasingly significant policy drivers such as climate change, inclusive growth and human wellbeing?

The focus and definition of 'sustainability' has already changed. Policy has shifted away from sustainable economic growth and towards sustainable and inclusive growth. It therefore remains an appropriate overall outcome, but has the potential to be further defined in response to the climate emergency.



## Should NPF be more strongly/clearly allied to the United Nations Sustainable Development Goals and, if so, are there particular goals which should be given particular attention through spatial or thematic policies?

There is a potential for NPF4 to translate the United Nations Sustainable Development Goals into a Scottish context. Our initial thoughts are that the historic and built environment has the potential of the to contribute to goals 3, 7, 8, 9, 10, 11, 13, 15 and 17.

## Are there particular locations/areas where planning policy could help transformative action within the inclusive growth agenda?

The historic environment is at the heart of many existing communities and has considerable potential for to contribute to the inclusive growth agenda. Heritage can provide a focus for a community, a reason to visit a place and something to be proud of. Historic buildings and features enrich our places and can contribute to our sense of identity and civic pride.

Using existing assets can increase sustainability and help retain and create a sense of place. Targeting investment toward their reuse and ongoing care can support the wellbeing of communities.

The historic environment is not just the sites, buildings and places that are legally recognised through listing, scheduling or any other process. It includes any existing part of our environment that has cultural significance. Communities should be empowered to identify the places and spaces they value and to define what the historic environment means to them. This was a key narrative of our [What's Your Heritage](#) campaign. The campaign helped to shape the new [Historic Environment Policy for Scotland](#).

At HES we can help communities who want to celebrate their historic environment. This can help to drive action to transform our places – and help to deliver inclusive growth.

This is chance for NPF4 to focus on disadvantaged communities. It should consider disadvantage in the broadest sense, including deprived communities, communities at risk from climate change, and communities that lack resilience to economic shocks such as that from Covid-19 – for example rural communities that rely on tourism.

## How do we ensure we increase opportunities for community engagement, including community-led local place plans, so that people's views are heard and can influence policy development?

We need to address the needs of communities holistically. Issues of the local economy, physical infrastructure and the cultural and social aspects of place need to be considered together, rather than in isolation. This can lead to better multiple outcomes.

Improvements to housing and the physical environment can reduce crime rates; feeling connected to a community can lead to better educational attainment; participating in community-led cultural activities can reduce social isolation and improve health and wellbeing.

We already know there is an opportunity to improve online access to planning, and this can help to support early engagement in the planning system. There is still a challenge to engage people and groups who have not engaged in the past.



Communities with a high-level of engagement are often those who are individually well-resourced in terms of finance and time. Finding ways to engage those that have limited resources could be a priority for NPF4.

To achieve this essential level of engagement it will be crucial to use resources the Key Agencies can offer. We will also need to identify ways of streamlining access and understanding the wider range of expertise that exists to facilitate access. This includes public bodies, local authorities, and third-sector organisations. There could be opportunities to share best-practise and collaboration between communities when creating community-led Local Place Plans. This will need to be facilitated and resourced.



## Climate Change

We broadly support the proposed key objective of NPF4:

To ensure planning policy results in spatial and land use change that facilitates Scotland's ambition to have net-zero emissions by 2045 and other statutory emissions reduction targets whilst supporting communities and businesses in making the changes needed to meet the targets.

### How best to ensure that our national planning policies respond to the new and urgent context of the global climate emergency and associated national strategies?

Our [Climate Change Risk Assessment](#) highlights that Scotland's climate is changing at an unprecedented rate. Changing climatic conditions can alter and accelerate decay processes of historic monuments and archaeological sites.

Policies should encourage a culture of ongoing care and maintenance of existing buildings. This will reduce the demand for additional and often unsustainable resources for new buildings.

[Research by Historic England](#) has shown that demolishing a historic building and replacing it with a new building could result in greater carbon emissions by 2050. Modern, highly processed building materials often have high carbon impacts in their manufacture, transport and use. Policy should explicitly acknowledge the full carbon cost of development. This includes embedded carbon in construction and infrastructure – not just running costs.

In the case of demolition, one option would be to introduce a presumption in favour of retention of existing buildings unless it can be demonstrated that the full carbon cost will be lower over a defined period. This would have to include the carbon cost of demolition and construction, compared to retention and upgrading of an existing building.

The full carbon-cost of development could be calculated and presented. It should form an explicit part of decision making. Free and easy-to-use tools to enable small-scale developments to calculate carbon-costs could be developed. It is likely that existing research could support this.

Making this information available may help us to see how well the historic environment, and wider existing building stock, can respond to the climate emergency. We would be able to understand carbon costs of changes like replacing of timber windows with PVCu – based on expected lifespans, maintenance and replacement. This would enable clearer decision-making.

Where demolition is necessary, salvage and reuse of sustainable materials should be a requirement.

The potential, and necessity, of upgrading existing building stock needs new and urgent action. Our [Managing Change in the Historic Environment guidance notes](#) give practical guidance on how existing buildings can be upgraded. This can result in considerable carbon reductions as well as thermal and economic benefits to building users – and minimise impact on cultural significance. The guidance notes are supported by a series of [case studies](#) that demonstrate best practice.

The policy criteria needed to ensure that new developments contribute as far as possible to emission reduction targets. In particular, how can NPF4 policies on topics such as placemaking, housing, transport, green infrastructure, energy, waste and flooding deliver emissions reduction objectives?

The places where we live, work and play affect our well-being. The historic environment is one of a range of factors that plays a key part in making good places. Place-based approaches give communities influence. They can deliver long-term solutions to strengthen the connection between people and place.

The potential of the historic environment to contribute to meeting this policy criteria should be firmly embedded in NPF4. New developments that support and contribute to existing historic centres are preferable to large-scale green field developments. They can ensure the viability of existing services including retail, education, health and transport facilities.

Brownfield sites, or vacant and derelict land, should be developed before greenfield sites in any given community. It is likely that a larger number of smaller developments would bring more benefits. This would require a focus on community-led, self-build, and small-scale commercial developments. NPF4 should focus on how to remove the impediments on developments like this that exist in the current planning system – and how to incentivise them properly. This is discussed in a number of the 2050 Think Pieces.

We would encourage clear policies embedding the maximisation of renewable and low-carbon energy generation and infrastructure in all new developments. This should stop being an ‘added benefit’ and become an ‘essential component’. This would help ensure the resilience and capacity of the wider renewable and low carbon industry. It would also bring associated benefits to projects which upgrade existing building stock and enhance existing communities.

The associated long-term need to minimise vulnerability and improve the resilience of places and communities to anticipated effects of climate change?

The anticipated effects of climate change on our built environment has been clearly stated. Resilient landscapes form the basis of climate friendly places. A landscape is resilient if it is in good, robust and adaptable condition.

Resilient landscapes will help us adapt to climate change by enabling natural systems and processes to function well. They retain cultural significance and evidence of human interaction, now and in the future. To make and keep our landscapes resilient, the environment will need to be considered on a holistic basis, drawing on both cultural and perceived natural heritage.

Efforts to improve the resilience of places and communities from negative effects are often seen as being in contradiction to other policies. This can include policies relating to the historic environment. It could be useful for national policy to give clear guidance on how to minimise impacts, and emphasise the potential benefits of these efforts.

Our historic buildings and features enrich our places and can contribute to our sense of identity and civic pride. Targeting investment toward their reuse and ongoing care can therefore support the wellbeing of communities. The quality of our historic environment is also key driver for our tourism growth and can help to stimulate the regeneration of places.

Our cities and towns tell the story of Scotland; we want to see them reactivated and energised. As part of this change, spaces that were once used for retail will find new and creative uses, and town centre living will increase. We want our towns and cities, which have

long been valued for their cultural significance, to become more convenient, accessible, and vibrant. They should have active and empowered communities shaping how these changes takes place. To be viable in the long term, they must be able to adapt to climate change.

### The need for policies to maximise the use of existing resources, including the conversion of existing buildings and to support retro-fit development related to energy efficiency for existing buildings?

We support these policies. We have extensive guidance on how to achieve this successfully. There is a UK-wide challenge in terms of the VAT imbalance between conservation, maintenance and repair work to existing buildings and new build. It may be necessary to address or counter this in national policy.

A key area of our work is supporting the reuse of empty buildings for housing delivery. This is underpinned by the [Historic Environment Policy for Scotland](#) (HEPS). HEPS requires decisions affecting the historic environment to contribute to the sustainable development of our communities and places.

We have published guidance on the [Use and Adaptation of Listed Buildings](#) which includes information on approaches to secure the continued use or reuse of buildings as well as advice on minimising risk to empty or underused buildings. Our [Buildings at Risk Toolkit](#) offers solutions for property that is vacant or at risk, and we also have a series of best practise [case studies](#) which demonstrate successful examples of reuse. We recommend that such approaches are promoted where appropriate. They should not be limited to designated historic assets.

It should be acknowledged that this issue likely requires a specific Scotland-wide project to deliver the necessary retro-fitting of our existing building stock. It would be the role of NPF4 to support the delivery of this.

### How can our policies support renewable and low carbon energy and associated infrastructure, including a response to on-site renewable energy generation?

We estimate there are around 450,000 traditional buildings in Scotland. This is one aspect and a small proportion of Scotland's historic assets. Our historic environment extends to include a wide range of structures including canals, communications equipment, railways, piers, bridges, civic buildings – and a great deal more. NPF4 should recognise this, and the contribution that culture and our heritage can and does make to the circular economy, sustainable development and various aspects of infrastructure maintenance and delivery.

Existing policies have enabled a successful and growing renewable and low-carbon energy industry in Scotland. At HES we have proactively engaged with these developments in responding to consultations for our interests in the historic environment. It is likely that challenges to this sector in the future will come from factors beyond the impact of NPF4 – for example changes to the economics of the sector.

In addition to implementing measures for energy efficiency, NPF4 should encourage behaviour change to reduce demand for energy. Ultimately this will rely heavily on behaviours and mechanisms outside the planning system. However, some measures could be implemented in relation to the construction sector. We have set this out in more detail in our comments on [question 3](#).



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NPF4 should influence behaviour by embedding the principle of a plan-led system which directs land-use decisions. It should follow the recommendations of the Infrastructure Commission and take an infrastructure first approach, prioritising the care and maintenance of existing assets.