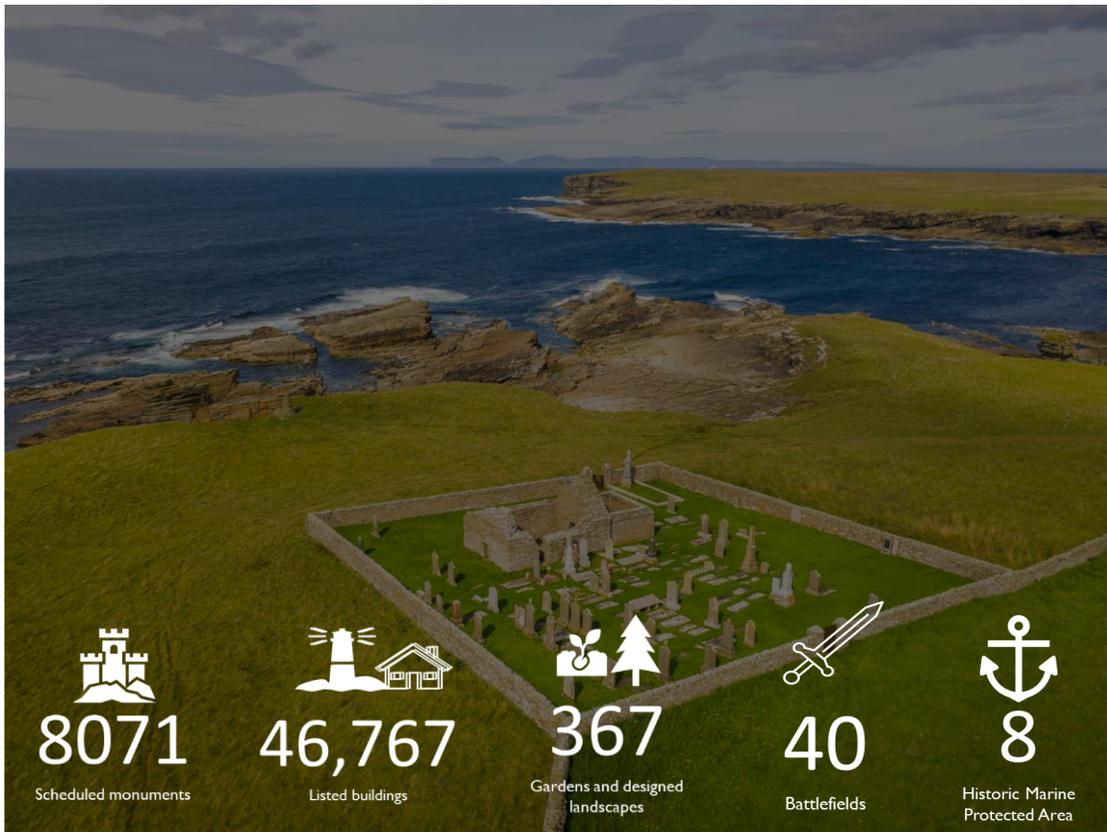




HISTORIC
ENVIRONMENT
SCOTLAND

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ALBA

ANALYSIS OF RESPONSES TO PUBLIC CONSULTATION ON SCOTLAND'S PROTECTED PLACES: A LONG-TERM STRATEGY FOR HISTORIC ENVIRONMENT DESIGNATION



Designations Service

October 2025

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EXECUTIVE SUMMARY

Historic Environment Scotland ran a consultation on its draft long-term strategy for heritage designation between 20 May and 1 July 2025.

This report sets out the results of our consultation following analysis conducted by HES.

We would like to thank all individuals, businesses and organisations who took the time to consider and respond to this consultation. Your collective input is invaluable in helping to inform our strategy.

The consultation asked a total of 21 questions, including both quantitative (closed) and qualitative (open) questions.

In total, there were 38 responses.

KEY THEMES

We are encouraged by the volume and quality of responses to our consultation, which reflects strong engagement with the topic, and a shared interest in the future of national-level designation in Scotland.

The following key themes emerged in responses:

OUR VISION, MISSION AND OVERALL APPROACH.

97% of respondents supported **the draft vision, mission and overall approach**. Comments were also supportive but with a call for greater clarity on what the strategy does and doesn't cover, particularly given the designation role of local authorities. There needs to be a stronger emphasis on genuine collaboration (with local authorities and with communities). While the strategy needs to be ambitious, HES should also be realistic about what it can achieve given resourcing challenges. A clear outcomes framework would be a useful addition to the strategy.

We invited comments on our proposal to change how we refer to 'designation' through the strategy. The proposal to **change terminology from 'designation' to 'protection'** elicited mixed views. On the one hand, many were supportive, particularly individuals, citing improved public understanding. However, there were concerns that "protection" could be misleading, lacks legal precision, and may cause confusion across planning systems. Responses from local authorities were the most likely to be critical and opposed to the change. Alternatives were suggested, and some recommended using both terms depending on the audience. At the very least, improved communication about the meaning of 'designation' was needed.

OUR PRIORITIES FOR 2025-28

Agreement with **the four strategic objectives for 2025-2028** varied from 82%-88%. Respondents who commented on the details were also supportive but with some concerns about feasibility, timelines, and resourcing particularly for HES and local authorities. There are differences of views between whether proactive new designations should be the highest priority or improving existing records. There were also calls for clarity around responsibilities and a desire for more information on delivery including measurable outcomes.

Most were supportive of initiatives under **objective 1 – looking ahead**, offering constructive suggestions. Taking a forward-looking approach was generally welcomed. While some commented that the 10-year horizon was too short for meaningful change, others urged quicker actions, cautioning against strategy overload in taking three years to develop long-term priorities. However, engagement on policy reviews was supported, with calls to align with wider government agendas and simplify policy frameworks. Engagement should be inclusive and collaboration by HES should extend beyond traditional stakeholders. Digital engagement tools were welcomed, though some accessibility concerns were noted. Respondents valued research and data-driven approaches, encouraging academic collaboration while also urging HES to value and sustain in-house research expertise to support long-term heritage protection priorities.

There was also widespread support for initiatives under **objective 2 to improve data and designation records**, with many respondents recognising their critical role in decision-making. Local authorities were seen as key partners. Concerns focused on the scale of the task, resource constraints, and the need for prioritisation and clear success metrics. Use of digital tools and AI were viewed cautiously with respondents valuing a critical approach and not discarding paper records. There was strong support for collaboration with communities, academia, and volunteers. Public input was encouraged but must be well-managed to maintain standards. Additional ideas included web forms for corrections, making designation data improvements a condition of grants, and including development history in designation records.

There was broad support for the initiatives under **objective 3 – improving our service**, particularly around improving service delivery and streamlining processes. Respondents welcomed the use of technology, including AI, to reduce admin burdens, but stressed the need to retain human judgement and expertise in decision-making. Public engagement in designation processes was seen as vital and should not be compromised by a drive for efficiency. Risk-based prioritisation was supported, though concerns were raised about transparency, local relevance, and potential neglect of lower-profile heritage. Mixed views were expressed about shorter reports. Suggestions included improving online systems and learning from other heritage designation programs to develop the prioritisation framework.

We asked for feedback on possible approaches for prioritising cases arising from public nominations given resourcing challenges. Many respondents supported **prioritising**

under-represented sites in areas under development pressure, especially given limited resources, but emphasised the need for transparency, consistency, and clear definitions. However, there were concerns about the risk of subjectivity, regional bias, of overlooking rural or sites valued by local communities and of overemphasizing threat over significance. Respondents called for co-development or the prioritisation framework with local authorities, clearer criteria and improved communication. Suggestions included enhancing application processes, using web forms, referring to research frameworks and ensuring community representations are considered in the nomination process. Some warned of potential displacement of requests to local authorities if HES does not respond to enquiries and stressed the importance of maintaining a national perspective.

There was broad support for **prioritising reviews of designations with inadequate records or questionable justification, especially where these impact management**. Respondents stressed the need for transparent communication and cautioned against de-designation based solely on poor records. Concerns included potential bias, neglect of rural areas, and unintended consequences of de-prioritising minor updates like statutory address changes. Some feared the process could be influenced by private agendas or political pressure. Fairness, consistency, and a transparent, collaborative framework were seen as essential to maintain trust in the system. Suggestions included fast-tracking minor corrections, clearer collaboration with local authorities, and maintaining a baseline effort for low-priority cases.

Most respondents supported **objective 4 – understanding our impact**, highlighting its value for policy development and to provide evidence to encourage investment in the historic environment. Supporters emphasised the need for public engagement, closing knowledge gaps, and balancing external and internal research. However, there were some concerns about whether this is a priority for core designation work compared with physical site protection, citing workload and resourcing. It would be important to build on existing initiatives to avoid duplication of effort. Local authorities stressed including both designated and undesignated heritage and viewing assets themselves as impact receptors. Suggestions included clarifying research aims, focusing on community, climate, and economic outcomes, and integrating with natural environment data.

There was also broad support for **the proposed impact themes**. Respondents urged early action and a balanced focus across themes. Economic impacts were seen as important but should not predominate. Some responses suggested including indirect economic benefits and sectors like farming. Wellbeing and social impacts drew support for exploring identity, inclusivity, and community value. Environmental impacts received mixed views, with calls for carbon quantification and biodiversity considerations. A fourth theme— cultural Impact— was proposed. Respondents stressed the importance of collaboration, including undesignated sites, integration with existing data, and meaningful, well-resourced methodologies with clear metrics.

THE IMPACT OF THE STRATEGY

To inform the impact assessments we are undertaking for our draft strategy, we asked for views on likely impact across several areas. Most respondents were neutral or cautiously supportive on **the impact of the strategy on people with the characteristics we specified (including protected characteristics)**, with some endorsing potential for greater inclusivity and accessibility. Several noted the current designation system is already non-discriminatory and expected this to continue. Positive impacts were anticipated if the strategy broadens community representation, especially for race, socio-economic background, and disability. Respondents stressed the need for both digital and physical accessibility and engagement with diverse communities to address unconscious bias. Some questioned the relevance of protected characteristics or felt the strategy lacked clarity on how these would be addressed, calling for more detail on intended actions and measurable outcomes.

Regarding **the potential impact of the strategy on island communities**, most respondents were neutral or cautiously positive, noting potential benefits. Key themes included the need to recognise unique and varied island contexts, with heritage often more deeply embedded in local identity. While designation could enhance community pride and tourism, concerns were raised about higher costs, limited contractor access, and maintenance challenges. Some feared islands might be de-prioritised in favour of high-development mainland areas. Respondents stressed the importance of equitable treatment, practical support, and tailored approaches to ensure the strategy delivers meaningful benefits without exacerbating existing logistical and economic barriers.

On potential **impact on Scottish business, the third sector and the regulatory context**, most responses were cautiously positive, highlighting its potential to improve clarity, reduce uncertainty, and support economic opportunity. Respondents welcomed clearer designation records and faster decisions but stressed the need for alignment with existing legislation and guidance. The strategy's success was seen as dependent on effective implementation, avoiding added bureaucracy, and supporting smaller organisations. Impacts may vary between private businesses and third-sector groups, and distinctions should be considered. There were calls for the strategy to promote local heritage understanding, skills, and regeneration, while ensuring it is practical, inclusive, and embedded in policy and guidance.

FINAL COMMENTS

When invited to provide **other comments**, most of the 21 responses expressed broad support for the strategy's intent, especially its emphasis on leadership, inclusivity, and improved information. Key themes included the need for clearer links between objectives and outcomes. Concerns about resources were widespread, particularly for local authorities and about protection of sites in rural areas. Respondents urged HES to lead collaborate widely and invest in staff expertise. Comments highlighted the decline of conservation areas, the importance of undesignated heritage, and clearer terminology. There were also calls to engage with underrepresented communities and to align with planning, climate, and community policies.

CONCLUSION

The consultation responses show strong overall support for our proposed strategic direction.

The detailed insights gathered through this consultation will directly inform our final strategy.

ABOUT OUR CONSULTATION

We held a public consultation on the draft strategy for six weeks from 20 May 2025 – 1 July 2025.

An online survey was hosted on [Historic Environment Scotland's consultation website Citizen Space](#) during this time.

Respondents were asked to submit their response by completing an online survey, or by emailing their response to our consultations' mailbox.

We provided the following information with our draft strategy:

- Our discussion paper – [Towards a designations strategy](#).
- A [stakeholder engagement report](#) by MainStreet Consulting. Before preparing our strategy, we commissioned MainStreet to gather evidence from stakeholders about our work.
- Preliminary impact assessments of our strategy from the perspectives of equalities and island communities – we will update these with the findings of this consultation.

We promoted the consultation through direct email contacts to heritage, planning, and community stakeholders and on social media through LinkedIn. During the consultation window, we organised two stakeholder engagement events (one online, and one in person) in partnership with the Built Environment Forum of Scotland. These events were attended by 32 participants (not including BEFS and HES).

The consultation closed on 1 July 2025. We received 39 responses.

Analysis of responses was conducted in-house by the HES Designations Service:

- We downloaded a report containing quantitative statistical information on responses to each question. This data is provided by Citizen Space, generated directly from our consultation website.
- We also downloaded a spreadsheet containing all responses including text responses. We analysed each question to draw out key themes arising in responses across different respondent groups.

This report sets out the results of the consultation, including statistics and our analysis of the responses. Percentages have been rounded up to the nearest decimal place.

Where we have asked for comments on questions, the report includes our summary of the key themes and illustrative quotes. We have also provided all free text comments in full (see [Annex](#).)

We have only provided names of individuals where we have permission to do so.

RESULTS

There were 38 responses to the consultation (38 to our Citizen Space web-pages and 1 by email). The following analysis considers all the responses together.

INTRODUCTION

Questions 1-2 concern personal data and permission to publish – not reported here.

3: Do you use heritage designations? (Select all that apply)

Option	Total	Percent
Yes - for my work	31	79.5%
Yes - for research and/or interest	24	64.1%
Yes - as an owner of a designated site or place	5	13.3%
No - I've heard of designation but have not used your information or services	2	5.3%
No - this is the first time I've heard of designation	2	5.3%
Not Answered	0	0.00%

4: Are you responding as an individual or on behalf of an organisation, business or community group?

Option	Total	Percent
As an individual	14	35.9%
On behalf of an organisation, public body or charity	12	30.8%
On behalf of a local authority	8	20.5%
As a private business, such as an architect or developer	4	10.3%
Representing a community group	0	0%
Other	1	2.6%
Not Answered	0	0%

The following organisations were named.

- Callander Heritage Society
- Association of Local Government Archaeological Officers (Scotland)
- Orkney Islands Council
- Architectural Heritage Fund
- Architectural Heritage Society of Scotland (AHSS)

- Scottish Branch of IHBC
- Aberdeenshire Council
- Scottish Borders Council
- Scottish Borders Council Archaeology Service
- Montagu Evans
- The National Trust for Scotland
- East Lothian Council Archaeology service
- The Highland Council
- Society of Antiquaries of Scotland
- ScottishPower
- Icen Projects
- Shetland Islands Council
- The City of Edinburgh Council
- Docomomo Scotland
- Historic Houses Scotland
- The Royal Town Planning Institute Scotland
- The Royal Incorporation of Architects in Scotland (The RIAS)
- Built Environment Forum Scotland
- Pegasus Planning Group (submission by email)

Questions 5-6 concern permission to publish responses and follow up with responders – not reported here.

VISION, MISSION AND OVERALL APPROACH

7: Do you support the vision, mission and overall approach?

Option	Total	Percent
Yes	38	97.4%
No	0	0%
Not Answered	1	2.6%

29 respondents provided additional comments. Overall, there was broad support for the vision, mission and approach but comments indicated a desire for greater clarity on what the strategy does and doesn't cover. There needed to be a stronger emphasis on genuine collaboration, particularly with local authorities and communities. While the strategy needs to be ambitious, HES should also be realistic about what it can achieve given resourcing challenges. A clear outcomes framework would be useful to include.

The following common themes appear across the responses:

Clarity and language

Respondents called for simpler, more inclusive language and clearer definitions of roles and responsibilities.

Jocelyn Cunliffe (AHSS) commented.

‘the vision is too long and should be re-written... Alternative Vision: Enable good decision-making for Scotland’s protected sites and places...’

Catharine Kidd (Montagu Evans) commented that the statements needed to be clearer on the role of HES, what the strategy will and won’t cover, and clearer about the role/responsibilities of others such as local authorities for designation.

Some commented on use of the terms ‘designated’ or ‘protected’ which had mixed views. For example, the National Trust for Scotland:

“We welcome the use of the word "protection", which is a commitment to conserving what is of historic and cultural interest, and which matches similar language in nature conservation.”

However, Aberdeenshire Council commented.

‘The change from ‘designated to protected’ sounds good in the Vision but could be misleading in the Mission and Approach. HES don’t protect ‘all’ heritage, owners of sites do. HES identify what is important and then support people through clarity of what a designation means, advice and guidance and grant.... Owners of assets need to take a positive responsibility for their role in heritage management and this needs to be clear.’

Use of terms like ‘most significant historic places’ was viewed by two respondents as potentially exclusionary.

“The phrase ‘most significant historic places’ does not align with the more holistic approach to the historic environment taken by the sector as a whole in recent years.” (Shetland Islands Council)

“While it may aim to reflect prioritisation, it risks reinforcing the idea that heritage is a closed set of already-designated places — undermining moves towards inclusivity and local significance. Many communities value places that don’t yet meet current designation criteria, or that sit outside traditional hierarchies. A more nuanced phrasing would better align with the strategy’s goals.” (Scottish Borders Council)

The Royal Town Planning Institute (RTPI) commented that:

“We do not feel the vision, mission and approach go far enough and are missing a critical element which sets out the purpose and importance of heritage

designation in Scotland. For example, what do we mean by “historic places” (in the vision) and why is it important for our historic environment to be “well managed for current and future generations” (in the mission).”

Role of HES

Taking a forward- looking approach was welcomed in responses.

*“We welcome and support a long-term conversation regarding heritage in Scotland and welcome the opportunity to participate in that conversation.”
(Andrew Puls, Highland Council).*

However, while recognizing the need for longer term thinking, Simon Gilmour, Society of Antiquaries of Scotland expressed some uncertainty about whether *“the conversation will be long-term or whether a more urgent conversation will focus on the long term”*.

Many stressed that HES is one of several key actors in relation to heritage protection, with local authorities and asset owners playing vital roles.

There is a call for recognition of shared responsibilities. For example, Scottish Borders Council commented:

“The Vision does not seem to recognise that Historic Environment Scotland is not always the determining body regarding changes for all designations. In fact, this is more often with the Local Authority.”

A similar view was advocated by Simon Gilmour, Society of Antiquaries of Scotland:

“The mission needs to refer directly to local authorities as well as, or instead of, one of the communities, partners and others. They are a critical component of any designation regime and need to be highlighted and recognised... “

Scottish Power noted:

“That HES’s role in providing accurate and accessible information about historic places is important to support the wider planning system in Scotland beyond just planning authorities. For example, HES supports the Scottish Government’s Energy Consents Unit which leads the consenting process for large energy generation and transmission infrastructure....”

Inclusivity and representation

There was strong support for better representation of underrepresented groups and places, but with some caution against neglecting established sites.

Nellie Merthe Erkenbach commented:

“I welcome the aim to better reflect Scotland’s diverse heritage by 2035... especially those of women, whose stories are often marginalised.”

The same respondent expressed concerns that current planning and designation processes undervalue rural, fragile, and intangible heritage.

Historic Houses Scotland supported a vision that seeks “to more fully reflect Scotland’s rich and diverse heritage” but commented:

“This approach must be sustainable and not at the expense of well-established historic places.”

Strategic focus, collaboration and partnership

The forward-looking and collaborative approach set out in the vision was welcomed by several respondents. For example, ALGAO Scotland:

“Welcomes the commitment from Historic Environment Scotland to plan ahead for the future of heritage protection, to take into account the challenges the world is currently facing, and to collaborate with partners in doing so.”

Genuine partnership—not just consultation—was seen as essential for success. An individual commented:

“My biggest concern is the general lack of courtesy and partnership working from HES... you are not Scottish archaeology but a very small part of it.”

It is clear from the comments that local authorities, funders, and community groups want to be active partners in delivering the strategy.

An individual commented:

“Ensuring further collaboration with communities, no matter how small, is vital for gaining new interest and future proofing heritage for the next generations”.

The Architectural Heritage Fund stated:

“We welcome the collaborative approach described as this task requires both the expertise and strategic oversight of HES, as well as the involvement of communities (of place and interest) in helping define what matters to them.”

Practicality and resourcing

Several respondents wanted HES to be more ambitious in its vision:

“We wonder whether the vision, mission and overall approach is bold enough”
(Scottish Branch of IHBC)

“We would hope that the vision – to ensure our protected historic places more fully reflect Scotland’s rich and diverse heritage delivering better outcomes and benefits – could be achieved sooner than 2035 and we would advocate for a more ambitious target.” (Highland Council)

While there is a desire to see the vision translated into tangible change, some comments (e.g. BEFS; Scottish Branch of IHBC) express concern about delivery of the strategy given potential resourcing constraints.

Meanwhile, Scottish Power commented:

“We feel it is important that the mission focuses on the most significant historic places. Given constraints on resources and the importance of historical preservation, it is appropriate for HES to be targeted in its mission.”

Catharine Kidd (Montagu Evans) suggested that the strategy should include signposting to clearer definitions/glossary and information on heritage outcomes.

8: We propose changing how we refer to designation in our strategy and communications. We often use this term to describe the legal recognition of historic sites. However, evidence indicates that the terms ‘Designation’, ‘Designations’, and ‘Designate’ are poorly understood by the public. We think it would be beneficial to make more use of the word ‘protection’ for its clarity of purpose. For example, ‘designated historic sites’ could become ‘protected historic places,’ and ‘designation records’ could be ‘protected place records’. Please give us your views.

There were 38 responses to this question. Overall, there was a generally positive or cautiously supportive reception to this proposal but with a significant number of nuanced, conditional, and even critical views.

Individuals were more likely to be supportive, and local authorities more likely to take a critical standpoint. Views amongst public bodies/charities and businesses were mixed.

In support of the proposed change, several respondents indicated that they viewed ‘protection’ as clearer and more accessible for the general public while ‘designation’ is seen as jargon and is not well used outside professional circles.

“This is a good change that makes better sense to a non-specialist audience.”
(Individual)

However, strong views were expressed against the proposed change.

Firstly, the term “Protected” may imply legal or physical safeguarding which is not always accurate.

“Protected is probably more misleading than Designated. It could include any site protected by anybody for any reason.” (Gareth Jones)

“Protected is a more understandable term than designated. Only snag is that legally protected is not the same as physically protected.” (Ailsa Smith)

Several respondents noted that “Designation” has legal and policy consistency and is widely used in planning frameworks. Changing terminology could lead to unintended consequences across the whole system:

“This is a terrible idea because it implies that anything not designated is not protected.” (Individual)

“...we are concerned that if the term ‘designated’ is replaced with ‘protected’, it follows that the term “un (or non-) designated assets” (which currently refers to c.95% of Scotland’s historic environment and are described as such in NPF4 Policy 7) will become ‘unprotected assets’, the inference of which suggests a lesser degree of importance, recognition and protection “ (Andrew Puls, Highland Council)

Changing terminology could create confusion and require extensive updates across documents and systems. BEFS reported the views of a member:

“Various national and local policies and other guidance use ‘designated’ so a change from this is highly likely to create confusion... [it is] changing established and entrenched terminology which is likely to have a big impact for those working in Heritage Management.”

Other terms which respondents suggested included ‘listed’ ‘recognised’; ‘registered’. There was also some discussion of the merits of using the term ‘places’, or whether ‘sites’ or ‘areas’ might be more appropriate in some instances. For its part, while urging against any change, ALGAO Scotland suggested that if HES still wished to change terminology, they would suggest ‘nationally protected places’ and ‘nationally protected place records’ to differentiate between national and local protection levels.

Finally, there was a suggestion that HES could combine use of the terms depending on the context.

“For heritage professionals, I would insist on current branding, however for the public it makes sense to rename the designations to include ‘protected’ in the title.” (Janine Macdonald, Callander Heritage Society).

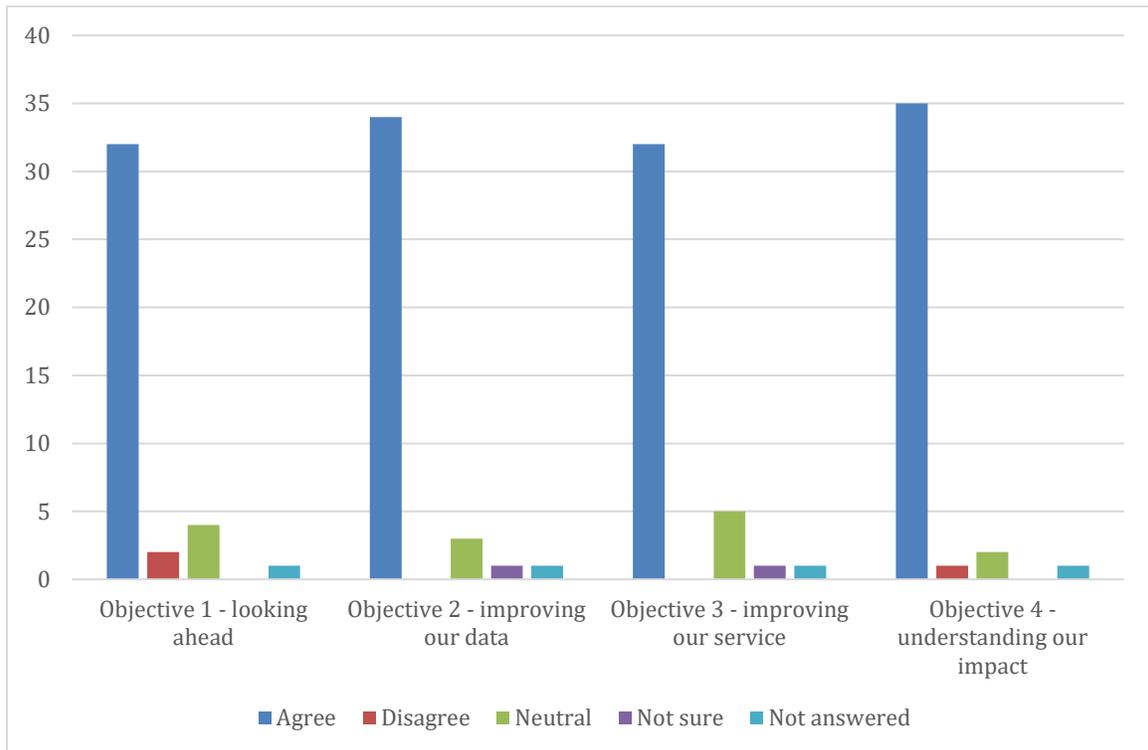
At the very least, better communication and education to explain the term ‘designation’ was required.

OUR PRIORITIES 2025-28

9: We have identified four priorities for HES in delivering the designations strategy over the next three years. Do you agree with them?

The table and graph below set out the responses to each objective. In summary, there was 82-88% agreement across all objectives (82-90%).

	Objective 1 - looking ahead	Objective 2 - improving our data	Objective 3 - improving our service	Objective 4 - understanding our impact
Agree	32	34	32	35
Disagree	2	0	0	1
Neutral	3	3	5	2
Not sure	0	1	1	0
Not answered	1	1	1	1



29 respondents provided feedback on the priorities indicating strong support across the board:

“ALGAO Scotland agrees with all four identified priorities and looks forward to working with HES where appropriate.” (ALGAO Scotland)

“I fully support all four objectives... particularly welcome the long-term commitment to clarity, inclusion, and transparency.” (Nellie Merthe Erkenbach)

Any concerns tended to focus on feasibility, particularly regarding timelines and resource constraints both within HES and across local authorities, and clarity on. BEFS summarised views from its membership:

“Members general feel the four broad priorities align with the wider needs of the sector, although discussions have generated concerns that some areas of the strategy need to be strengthened, and questions about where the capacity needed to make serious progress will come from. There are also calls for clarity on responsibilities, functions and implementation within the priorities.”

One response questioned the achievability of these priorities considering ‘HES’s records-upgrade backlog, inadequate funding, and a stretched, small team’ while asking HES to focus:

“On the primary purpose of designations: the protection of sites of special architectural or historic interest. This protection is not about placing buildings in aspic; the greatest way to ensure a building will survive for future generations is to allow it to have a useable function.” (Historic Houses Scotland)

On the detail some comments focused on the relative importance of the priorities with differences of opinion, particularly between whether new designation or improving existing records should be a higher priority. There were also suggestions for improvements.

On objective 1:

On relative priorities:

“DS think this should be the priority (what does a conversation mean in practice - consultation, forums, 121s with stakeholders?) - we hope this will get to granular details (ie identifying areas where HES designations will progress proactive work into, for example, threatened building typologies, under represented typologies, and activity to capture 'coming of age' architecture ie. 80s/90s/2000s. DS would like to be involved in informing that process.” (Docomomo Scotland)

On timescales:

‘10 years is not long term with reference to the historic environment.’ (Gareth Jones)

On what a national conversation might include:

*“Could this include leadership on alternatives to national designations...”
Catharine Kidd, Montagu Evans)*

In relation to this objective there was some desire for greater clarity:

“The first objective is too vague and unfocused. We recommend that Historic Scotland take the lead in initiating a national debate to define long-term priorities for heritage protection, particularly in relation to the allocation of limited resources. This debate should result in clear decisions about how resources are deployed, including an understanding of the associated consequences and trade-offs.” (The RIAS)

“The first objective is a bit woolly - what priorities are being considered? It would be useful to be clear in this objective that all options are to be considered, from what is protected (now and in future) to how the process will change.” (Simon Gilmour, Society of Antiquaries of Scotland).

The Society of Antiquaries of Scotland also maintained that the potential for legislative change should not be discounted before the long-term conversation has occurred.

On Objective 2:

There were conflicting views on the relative priorities between new designations and addressing issues with our designation records.

One the one hand:

“It is more important to invest in new research and designations than revisiting old records.” (An individual)

“Objective 2 seems overly ambitious and very resource heavy... could distract from Objective 1.” (Docomomo Scotland)

And, on the other hand:

“Improving our information” has significant priority and resource needs allocated. Given, it is this information that is used on a day-to-day basis in relation to planning and regulatory functions that is of key importance.” (Scottish Branch of IHBC)

“This is a vital objective for HES. In our view, it is essential that all designations have adequate and accessible information in relation to them available, detailing the importance and setting of the designation” (Scottish Power).

On Objective 3:

*“Need to ensure this is as focused on good outcomes, not just quick decisions.”
(Cheryl Roberts-Nairn, Aberdeenshire Council)*

Objective 4:

Scottish Borders Council commented that this objective “*will be essential to justify heritage protection and inform future funding and policy.*” However, Docomomo Scotland expressed reservations that this objective could be a distraction from core work and that it could eat up valuable staff time for no discernible gain. Meanwhile, Montagu Evans commented.

“Metrics for measuring impact and value would need to be clearly established. This should also be honest about the sometime negative impacts of heritage designation - i.e. abandonment and decay/lack of protection - this could link into the priorities of Objective 1.” (Catharine Kidd, Montagu Evans)

On other suggestions, the Architectural Heritage Fund suggested “*It may be useful to frame the objectives in the context of what issue/problem they are seeking to address. This may help link them back to the Vision/Mission.*”

OBJECTIVE 1: LOOKING AHEAD - HES WILL LEAD A COLLABORATIVE AND INCLUSIVE CONVERSATION TO DEVELOP AND PUBLISH LONG-TERM (10-YEAR) PRIORITIES FOR HERITAGE PROTECTION BY MARCH 2028

10: Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

There were 38 responses to this question. Most responses were supportive, with several offering constructive suggestions.

Two respondents commented that the 10-year horizon was insufficient:

“It would be our view that the envisioning and development of priorities needs to encompass a longer period than a 10-year priority. It would not be unreasonable, given the change of thinking/ direction/ approach that may be required to think in terms of a 15- 20-year period built up of 5-year action plans, with scope to respond to parliamentary cycles.” (Scottish Branch of IHBC)

However, several responses indicated concerns over strategy overload and a preference for focussing on action and implementation.

“Taking three years to deliver a 10-year strategy for designations seems excessive. It also appears contradictory to Objective 3 - improving our service, especially the delivery of timely decisions! While it is understood that other objectives appear to be undertaken in advance of March 2028, given the feedback already provided, data already available and the scale of the organisation this should be completed much sooner. The feeling from this and

succeeding objectives is that a more strategic pro-active approach will only start from March 2028.” (Simon Gilmour, Society of Antiquaries of Scotland)

“The sector has enough strategies... There is a desire for more focus on action and implementation. Creating strategies within strategies risks confusion.” (Derek Rankine, BEFS)

The response from BEFS also encouraged alignment and positioning of the strategy with other government policy initiatives and agendas (e.g. health and wellbeing, climate change, 20-minute neighbourhoods).

Moving onto the initiatives to deliver this objective, several responses supported engagement on priorities through forthcoming policy reviews which they felt were needed:

“We welcome review of Designation Policy and Selection Guidance and this needs to happen in conjunction with relevant case law.” (Scottish Branch of IHBC)

“There are too many policy and strategy documents! It is confusing for the general public and even practitioners to have such a wealth of policy and strategy documents that are saying similar things in different ways. In the light of NPF4 Policy 7, which does a good job of setting out the principles and desired outcomes of heritage policy at a national level, I would suggest scrapping HEPS altogether.” (Individual)

Local authorities encouraged early engagement on policy reviews, particularly on the review of HEPS and Designation Policy.

Responses suggested strong support for strategic engagement. While the contribution of the local authorities was raised by many respondents, comments suggested that engagement needed to be inclusive, collaborative, and community-driven, reaching out beyond traditional audiences:

“HES should consider room for emerging stakeholders who may add value to the process.” (An individual)

“We would strongly encourage HES to view the planning profession as a critical aspect of the collaborative and inclusive conversation, particularly to ensure a clear understanding is gained regarding the knowledge, skills and data needed for quality decisions to be taken in relation to heritage sites and buildings.” (RTPI)

“Strategic engagement must go beyond formal institutions to include local voices, storytellers, and grassroots historians.” (Nellie Merthe Erkenbach)

“We would strongly encourage HES to include both network (transmission and distribution) operators and renewable energy companies in future engagement

processes before the 10-year priorities are finalised and published.” (Scottish Power).

The use of digital tools for engagement and data sharing was seen as a positive step, especially if accessibility is addressed. However, Janine Macdonald (Callendar Heritage Society) warned that *“some social minorities might not have access to the internet to participate.”*

Respondents supported the value of research and moving towards a more systematic, data-driven approach to setting and taking forward long-term heritage protection priorities. The response from Scottish Borders Council suggested referring to research agendas as a source of evidence. Meanwhile, Dr Alastair Fair (University of Edinburgh) highlighted capacity and willingness in academia to work collaboratively with HES on heritage protection priorities (e.g. through PhD research). While collaboration was welcomed, including with interest groups and communities, several respondents (e.g. Docomomo Scotland) urged HES also to retain and develop in-house expertise to contribute to this objective.

Other suggestions included:

- How we refer to amenity bodies – misleading as the amenity system does not exist in Scotland – ‘campaigning and interest groups’ would be preferable. (Docomomo Scotland)
- Involving owners of historic sites *“the feedback of private owners would provide a vital dataset on the efficiencies/inefficiencies and the success/failures of the designation system. Their insights would prove to be invaluable in establishing robust, long-term priorities for heritage protection.”* (Historic Houses Scotland)
- Not ruling out the potential for legislative reform and including discussion on long term decisions on resource spending (The RIAS).

11: Our intention is to lead the strategic conversation about the whole system of heritage protection across Scotland to ensure an integrated and comprehensive approach. This includes aspects led by local authorities. We think that any discussions about the long-term future of heritage protection should adopt a ‘whole-system’ approach. For example, including how undesignated sites are managed in the planning system, and how locally and regionally important sites and places such as conservation areas are recognised and protected. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system?

Option	Total	Percent
Yes	28	71.8%
No	3	7.7%
Not sure	8	20.5%
Not Answered	0	0.00%

33 respondents offered comments on this question. There was some uncertainty about what HES meant by the question but overall, the comments indicated strong support for HES to lead a national conversation. However, it must be inclusive, collaborative, well-defined, resourced, and action oriented.

“I absolutely agree. In some respects there is too much duplication at present and in others there are gaps in the system. The strategic conversation needs to cover the whole system.”

Although most respondents agreed with the proposition, two respondents disagreed and raised the following concerns:

“You are struggling and failing on many levels of protecting what is already 'in your care'. Might be a suggestion to sort out your own heritage protection gaps before looking over the fence to others.” (Julie)

“I agree to a point, and I understand why local authorities are critical in this part of the conversation. However to implement meaningful change HES will need to have the Government involved. The legislation for heritage buildings in Scotland and indeed other parts of the UK is now in need of an update. If you are serious about conversation and proactive change for the future you are missing an enormous opportunity by keeping things localised.” (Individual)

In any conversation on the whole system, local authorities are seen as central to delivery but are under-resourced, and in some cases, lack expertise. While the proposition received support from local authority respondents, there was some uncertainty about what this would involve. How the conversation was set up would be key given the risk of HES alienating local partners.

“It is unclear what this means, what are you passing on and to whom. It might be worth comparing workloads between HES Case Officers and Council Archaeologists and Listed Building officers.” (Individual)

Historic Houses Scotland expressed concern that this should not be a way for HES pass on work to local authorities that are already stretched.

Respondents offered many aspects that should be included in a national conversation:

- Emerging heritage.
- Alternatives to designation
- Schemes to support management of designated heritage and contribute to climate change mitigation/adaptation.
- Conservation Areas including the relationship with listing.
- Undesignated heritage and planning policy
- Local authority roles and resourcing and support to delivery positive outcomes.
- Statutory status for Historic Environment Records.

- Skills development
- Volunteer contributions.
- Local and intangible heritage
- The vulnerability of undesignated traditional buildings.
- Ecclesiastical class consents.
- Marine heritage.

OBJECTIVE 2: IMPROVING OUR INFORMATION - BY MARCH 2028, ENHANCE THE CLARITY AND ACCURACY, ACCESSIBILITY AND USEABILITY OF OUR DATA AND DESIGNATION RECORDS SO THAT SCOTLAND'S HISTORIC PROTECTED PLACES ARE BETTER UNDERSTOOD AND VALUED.

12: Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

There were 38 responses to this part of the question. Most responses were supportive, with several offering constructive suggestions. However, there were concerns.

There is strong support for improving the quality and accessibility of data and designation records given realisation of the role of the information in decision-making.

“For BEFS Members consulted on the Designations Strategy, discussions indicate that this is the most important area for many.” (Derek Rankine, BEFS).

Local authorities are seen as essential partners subject to concerns about capacity and the need for effective coordination.

“Strongly agree with this objective, trying to make good decisions on poor quality information is a huge challenge currently.” (Cheryl Roberts-Nairn, Aberdeenshire Council)

“We have identified a historic site... under threat from housing development... the site lacks a clear, detailed record... Better documentation isn't a bureaucratic detail. It's a form of recognition—and often, the first line of defence.” (Nellie Merthe Erkenbach)

“ALGAO Scotland welcomes the proposed initiatives to improve the accuracy of designated records. Where appropriate, working with the local authority services augmented by Historic Environment Records would aid with this work, and ALGAO Scotland requests early engagement to discuss how best this can be achieved.” (ALGAO Scotland)

“As a developer, it is access to accurate and complete site-specific information, including its setting, that is critical to design projects.” (Scottish Power)

However, there is a recognition of the scale of the task and a call for realistic timelines, resource planning, and clearer success metrics.

“Given the current state of the statutory lists and other designations, the format in which they are currently in with associated mappings, the redefinition of scope, removal of ambiguity and editing and re-presentation of information, we think that to have regularised data by March 2028 is ambitious and would certainly require significant front-loaded additional resource input.” (Scottish Branch of IHBC)

Some respondents placed emphasis on the need for clear prioritisation.

I think improvement in the data is a worthy aim. However, it is an enormous job and it may be better to prioritise key data (name/ address/ category/ mapping/ Statement of Interest) over the detailed description. Even when descriptions are detailed, they do not always capture every important detail about a structure (even if it is not identified in the detailed description).” (Individual)

“Should HES wish to find a way to prioritise records to bring up to standard, they will need to give careful thought to criteria used to identify such records. Do areas of high development and land use pressure include forestry, windfarms, agricultural changes as well as building development, for example?” (Orkney Islands Council)

“HES will need to make difficult decisions when balancing this project with its wider work. Is this project deliverable? Is it affordable? What are the timescales? While supporting the aim of this approach, Historic Houses Scotland would recommend a proportionate amount of funding and energy is placed on this ambition. It will be necessary to have a clear triage process to determine how this priority will be achieved and to determine exactly what success would look like.” (Historic Houses Scotland)

“as a funder we are keen to understand why a building has been designated, so the ‘statement of special interest/significance’ is particularly valuable. It is helpful for us to understand the rationale for listing, with succinct reference to the criteria in 2020 guidance” (Architectural Heritage Fund).

Technology and AI are seen as useful by some but must be applied carefully, with attention to accuracy and sustainability. Paper records should not be discarded.

“AI is often inaccurate and also is environmentally disastrous in its energy use, so it is a bit disappointing to see HES embracing it uncritically.” (Dr Alistair Fair)

“I am worried about the accuracy of data if the AI used is of the large language model type.” (Individual)

“We should be wary not to discard what we have on paper. A strategy to ensure digital records can be reformatted in the future is also worth consideration.”

(Individual)

Several respondents endorsed involving the public and seeking feedback but recognised the need to maintain standards:

“Gathering public feedback can be useful, but it needs to be checked and requires significant resource to manage it effectively. To some extent it might be better to focus training and resources on supporting local authorities to ensure that the importance is recognised in the development control process”

(Individual)

“Standards and consistency in approach are important... Public feedback has the potential to increase the capacity of the sector workforce.” (Individual)

“Rather than spent time auditing to see if benchmarks have been achieved why not set out to update the list descriptions, training a team of data and architectural history interns over, say, a 5-year period, working under experienced HES staff. There are opportunities here for involving the universities, amenity societies and other external academics who can add value to the record.” (Jocelyn Cunliffe, AHSS)

The following additional suggestions arose:

- Making use of heritage statements prepared for planning applications to inform record improvements.
- Recognition of map depiction issues addressed through positional accuracy work (PAI) in addition to textual improvements.
- A web-form for the public to identify inaccurate designation records
- Tying data improvements into grant mechanisms — e.g. requiring better local records or statements of significance as part of funding conditions for maintenance, development or reuse.
- Recent development history being included on a designation record with opportunity for the public to contribute information, as with the Buildings at Risk Register.

OBJECTIVE 3: IMPROVING OUR SERVICE - REDESIGN OUR PUBLIC OFFERING TO DELIVER TIMELY DECISIONS, PUBLISHING DETAILS OF A REVISED APPROACH IN 2025/26.

13: Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

There were 38 responses to this part of the question. There was broad support for the initiatives under this objective but with comments on the details and some concerns.

Many respondents indicated understanding of the context for this objective, including requirements for appeals and public engagement.

Respondents expressed support for improving service delivery, especially around streamlining processes and clarifying procedures,

“ALGAO Scotland recognises the increasing demands for ever-quicker response times to consultations, in particular national planning infrastructure applications. We therefore welcome the commitment to review and streamline process by Historic Environment Scotland and look forward to working collaboratively to help achieve these aims.” (ALGAO Scotland)

There was a degree of realisation of the context for increasing timescales, including the requirement for increased engagement on designation matters and appeals. Several respondents stated the importance of public engagement by HES on designation cases, and that this should not be compromised by a push for greater efficiency.

“It would be desirable to see systems and processes improved and with improved timelines, however, as was noted in the consultation, this has to be set against any requirement for greater public engagement and the right of appeal. It would be good to better understand the public and user perspectives on what they consider to be efficient processing. (Scottish Branch of IHBC)

Some comments support the use of technology, particularly to enhance public engagement or if it frees up staff time on admin procedures to undertake more important tasks and apply judgement.

“some processes could be improved e.g. using AI for example to support decision letters for more standard applications (but potentially with better signposting to supportive guidance). This needs to be in tandem with improving the information supplied to applicants and ensuring that when sites are of particular interest the time saved on other processes gives staff time to engage more fully in applications and sites that need it.” (Cheryl Roberts-Nairn, Aberdeenshire Council)

“AI will be useful for administrative responsibilities it is likely that judgements will still need to be led by humans. While easing some administrative burdens, it will not be a catch-all solution.” (Historic Houses Scotland)

However, there was a degree of wariness around over-reliance on AI and the risk of losing human insight and expertise.

“I have concerns about over-reliance on AI and subsequent ‘automation of certain tasks’—what works would these be?” (Individual)

“There is unlikely to be any replacement for human expertise, though this could be supported by new tools.” (National Trust for Scotland)

“ Technology should be a tool to amplify human insight, not replace it. More brains, less tools. I believe heritage protection must start with people—not platforms. No amount of AI or digital processing can replace the insight of those who know a place intimately.” (Nellie Merthe Erkenbach)

There was a good level of support for prioritisation by heritage risk, with suggestions on as to what this should involve:

“HES will not currently consider sites where there is an active development proposal, something which seems to be at odds with the idea of considering sites according to ‘heritage risk.’ I would support the abandonment of the ‘active development proposal’ refusal to consider designation..” (Dr Alistair Fair, University of Edinburgh)

“Consideration should be given to prioritising requests for new / amended listings and schedulings from local authorities, especially where these are connected with a potential threat to the integrity of the asset. We would also suggest HES review their stance on designating assets where there is an active planning proposal – very often important asserts only come to light through the planning process, and by limiting opportunities to protect such sites we risk losing significant elements of Scotland’s national heritage.” (Andrew Puls, Highland Council)

“A dynamic risk-based approach should reference the need to understand the wider policy and operations landscape, including the impacts of national developments such as the agriculture bill, the impact of afforestation, the impact of city deals etc.” (Simon Gilmour, Society of Antiquaries of Scotland)

“Generally supportive – but would need to encompass local priorities with respect to ‘heritage risk’ and whether these are manageable” (Scottish Borders Council)

However, Historic House Scotland raised concerns about how impacts on people and communities” would be measured in the prioritisation process, *“and, what is the possible*

impact on heritage that is deemed to not have a significant level of impact on people and communities?”

In any approach that considers level of risk, transparency and effective communication are needed.

“The criteria for prioritisation also require more transparency. Without clear, shared frameworks, there’s a risk that lower-profile but locally significant cases—especially those involving non-designated heritage or community value—may be overlooked.” (Scottish Borders Council)

“External requests will need to be made aware that there is a prioritisation hierarchy (of course, requests may then be overly biased or prone to hyperbole)” (Iceni Projects).

“Timely and accurate engagement is important as later in the project life cycle it is significantly more difficult and more expensive to change plans. Additionally, developers often manage various potential impacts across a range of stakeholders and statutory consultees, which underscores the importance of early engagement.” (Scottish Power)

The proposition of shorter reports received mixed views:

“Short visual overviews are great for anybody's understanding instead of a 150 page document” (Janine Macdonald, Callander Heritage Society).

“Shorter reports and faster workflows may help with volume, but they can miss nuance, context, and lived experience—especially in communities that don’t have formal heritage voices.” (Nellie Merthe Erkenbach)

“The move toward shorter assessments and a risk-based approach risks diminishing the depth and robustness of heritage input. We rely on your advice to be thorough, proportionate and context-specific—particularly when balancing heritage impacts within complex planning decisions. Any reduction in quality or clarity may undermine our ability to justify decisions at appeal or inquiry.” (Scottish Borders Council)

Several respondents offered suggestions for improvements:

- Improving online application forms and processes – at present these can be difficult to locate and complete.
- Revising the setup for new proposals like the grant system. For example, accepting submissions during two quarters of the year only to provide breathing space; and offering a two-lane set up so people can 1. just flag up information or similar about a site/building/asset rather than submitting a formal application and 2. submit a formal proposal.
- Developing a prioritisation matrix to enable work to be impactful.

- Communicating which buildings have previously been considered to reduce duplicate requests.
- Use of research frameworks and commissioning projects within local areas to develop skills.
- Initiatives to support and strengthen local authorities – e.g. secondments to the proposed planning hubs.
- English Heritage’s Monuments Protection Programme enhancement projects and county-based scheduling acceleration projects may be useful for informing proposed scoring exercise work, where sites are not unique.
- Including a streamlining success measure for how many times HES is consulted/receives external requests and reduction in response times.
- *“Showing how the results of considering external proposals inform wider thinking around designation, particular in gap areas. Arguably external proposals play a valuable role as ‘indicators’ of ever-changing public interest in heritage.”* (Architectural Heritage Fund).
- More meaningful evaluation including feedback loops with local authorities and shared performance metrics.

14: When we set out a revised approach for handling external requests, we think we will need to be more selective to deliver the greatest impact with our available resource. An approach could be to prioritise new designation requests concerning under-represented sites, especially in high development/landuse pressure areas. What do you think of this approach?

There were 38 responses to this part of the question.

Many respondents indicated their support or conditional support for the prioritization approach, especially when resources are limited.

“An understandable approach. The reality is to be successful there needs to be focus and HES cannot do everything with the resources it has to deliver.”
(Individual)

“We agree that prioritisation is important, given limited resources. We also agree that priority should be given to new designation requests where such are located in areas subject to development/land use pressures; it may be that this criterion is more important than whether a site is under-represented.” (Andrew Puls, Highland Council)

“Yes the approach should be dynamic and flexible and positive discrimination toward areas that are lacking in information or where there are known gap”
(Individual)

However, an individual who uses HES designations information for research, suggested *“the approach sounded very subjective and could be seem as unfair”*.

Meanwhile, Scottish Power queried the approach advocating for a significance-based approach regardless of development pressure:

“With over 56,000 designations listed in the HES historic environment portal, it is reasonable to assume that a significant percentage of the sites in Scotland requiring a designation are already on this list. In this context, we would suggest that HES makes decisions on new designations irrespective of areas with high development, and instead focuses on sites that truly meet modern thresholds for designation and protection.”

Many responses raised the importance of transparency and consistency in decision-making and the need for clear communication of procedures.

“Prioritising under-represented sites in areas under development pressure is the right idea—but only if selection processes are transparent, inclusive, and grounded in lived experience, not just desk-based criteria.” (Nellie Merthe Erkenbach)

“Please be clear about the process and where people should go for more information or signpost to other resources and next steps.” (Individual)

Much of the discussion focused on the criteria for prioritization, both in terms of the rationale and definitions. While supportive of efforts to address under-represented heritage, Scottish Borders Council suggested that:

“Prioritising designations based on development pressure risks shifting the focus from significance to threat. Designation should remain rooted in heritage value, not planning context alone.”

A call for clearer definitions and transparency about terms like “under-represented” and “greatest impact” appeared in several responses.

“While this seems logical, it is unclear what under-represented means (under represented versus what?).” (Simon Gilmour, Society of Antiquaries of Scotland).

“We would be interested to learn how HES intend to define an ‘under-represented site’, and the process for agreeing what site types are under-represented – use of national and local Archaeological Research Frameworks should be used to help inform this process. This may vary from area to area and discussion with local authorities will be important in helping identify sites and site types that are poorly represented in the local record.” (Andrew Puls, Highland Council)

“Depends how you define under-represented sites. I am not sure what you mean with this if it might be a site of local significance but not nationally?” (Janine Macdonald, Callendar Heritage Society).

“The lack of clarity on what constitutes “greatest impact” is also problematic. Without transparent criteria or a published framework, it will be difficult for local authorities and communities to understand how requests are assessed or why some are taken forward over others.” (Scottish Borders Council)

“The AHSS thinks each case should be considered on its own merits. Does ‘under-represented sites’ relate to examples of building types eg a cooling tower? If there is a building which meets listing criteria we would like to see it listed. If a building is considered worthy of listing in one part of Scotland, and there is something similar but perhaps with different regional characteristics on the opposite side of the country our preference would be that both be listed.” (Jocelyn Cunliffe, on behalf of the AHSS).

Some respondents expressed concern about the risk of regional bias and overlooking rural sites.

“Several BEFS discussions have highlighted regional imbalances in designations at present, and suggest the strategy could usefully set out a targeted intervention for cold spots. The data management initiative to prioritise, “areas of high development/land use pressure” was seen as potentially working against a corrective to this patchiness, particularly with regard to rural geographies, low density settlements and places with low development activity.” (Derek Rankine, BEFS)

“Each request should be handled on its own merit, irrespective of geography.” (Julie).

“There is a risk that by focusing on “high development” sites, rural sites may be neglected. These sites, though rural, can still have significant importance to their local communities and impact on people.” (Historic Houses Scotland)

“Key to achieving this will be continued support of Regional Research Frameworks. There will also need to be a concerted effort to avoid ‘area bias’ both geographically and chronologically and we would advise that the Local Authority archaeological advisors could help with this as they are best placed to advise on the nature and significance of sites within their area and regionally..” (East Lothian Council Archaeology Service)

One respondent suggested that, while good in theory, those with the loudest voices might place pressure on HES for particular sites. The same respondent suggested community representations should be a factor:

“I think decisions on what has priority need to be more nuanced. How will you determine what is ‘under-represented’? If there is a choice between directing resources at a high-quality building under threat and one that is under-represented but not under threat, surely the high-quality building should have precedence? Maybe a better way would be to make an initial sift assessment of

quality/threat and give priority to community representations (e.g. community councils and amenity bodies) rather than individuals, so that there is already a local consensus in favour of the designation”

On the question of community representation, Icen Projects queried

“Would the number of people submitting external requests have a bearing on how a site is prioritised? E.g. If more people submit external requests for a site, would a site be prioritised more?”

Finally, while agreeing with the principle of prioritisation based on development pressure, one local authority respondents expressed concern about the risk of displacement of requests from the public if they aren't getting a response from HES:

“The issue is whether there are other means in place i.e. clear guidance/advice on your webpages that people can use instead of a direct response to their request. It is important that HES's webpages are user friendly so people can access information in other ways if you are not providing a direct response. There would be a concern that there is a displacement of requests to local authorities where there are resources pressures.” (City of Edinburgh Council)

There was a suggestion from Scottish Borders Council for HES to work with the local authorities to co-develop a prioritisation framework:

“A revised approach should be co-developed with local authorities, include clear prioritisation criteria, and maintain national coverage—not just respond to development hotspots.”

A few other suggestions arose in comments:

- Requiring a higher burden of proof with external applications (e.g. a larger amount of supporting material. This would allow HES to have a stronger understanding of the site when considering how to prioritise it.
- Improving application processes by moving to web forms.
- Consulting regional research frameworks to inform understanding of under-represented sites.

15: We are also likely to prioritise reviewing existing designations that we think are no longer justified or those where inadequate records are having a negative impact on their management, especially in high development/landuse pressure areas. Requests for less impactful cases, like address/category changes and minor corrections, may not be priorities. What do you think of this approach?

There were 37 responses to this question. There appears to be broad support for the principle of prioritising reviews of designations with inadequate records which impact

management, or those with questionable justification, while pointing to the need for clear communication of priorities:

“Changes in category or minor corrections should have low priority, I agree. Existing designations that are no longer justified or where inadequate records are having a negative impact on their management seem sensible priorities.”

“Yes, makes sense to prioritise these areas.”

“We therefore welcome the prioritisation of reviewing designations that are deemed to be no longer justified, and we believe it will be important to communicate these changes to planning decision-makers so that current projects are not impeded or unduly impacted by out of date designations.” (Scottish Power)

“We would welcome a targeted, proactive approach to address under-represented sites. As part of this it will be necessary to de-prioritise less impactful activity. It will be helpful for communications to explain the reasoning for focussing the very limited resources of the HES team to where there is more strategic need.” (Architectural Heritage Fund)

While supportive of the principle, several responses offered constructive feedback both on the detail of the prioritization framework and on process.

On the prioritisation framework, a recurring theme concerned record quality, and in particular, the risk that sites might be de-designated simply because of poor quality records.

“I strongly urge caution when reviewing existing designations that may appear ‘no longer justified’ based on outdated or incomplete records. Just because something is poorly documented doesn’t mean it lacks value—it may simply have been overlooked” (Nellie Merthe Erkenbach)

“While the proposal to review existing designations is reasonable... inadequate records should not be used as justification to de-designate sites.”

“While the proposed approach is reasonable... we would raise concerns should the lack of detailed information be the sole justification to de-designate.”

“To lose a place like this because of inadequate records would be a devastating failure of heritage protection.”

“We are extremely wary of this approach. Once a building is listed our preference would be that it remain listed and the owners seek listed building consent if they wish to alter the building.” (Architectural Heritage Society of Scotland)

A response on behalf of the Scottish Branch of IHBC raised further concerns:

“I am not entirely comfortable with the idea of 'no longer justified' which implies that owners who have wilfully under-maintained or compromised the significance of their building/site will now be 'rewarded' with de-designation.”

As with question 14, some respondents, particularly those from local authorities, suggested that the proposed approach compromise rural areas.

“This seems sensible, local authorities could help as detailed above. Although do need to be cautious that where there is less development pressure, the quality and accuracy of designations does not become so poor that heritage management in those locations suffers.” (Cheryl Roberts-Nairn, Aberdeenshire Council)

There were also differences of opinion on what constituted minor changes, particularly in respect of statutory address changes, and suggestions that some low-impact work needed to be maintained,

“Dismissing lower-impact cases—such as address or category changes—as low priority risks perpetuating known inaccuracies. These updates, though minor individually, can significantly affect day-to-day planning decisions, enforcement, and public understanding. Leaving them unresolved undermines confidence in the designation system.” (Scottish Borders Council)

“We agree that minor adjustments should generally take less precedence than reconsideration of designations that are no longer considered justified. The exception here would be street address adjustments which are integral to the legal designation and can generate uncertainties about what is covered by a designation.” (Scottish Branch of IHBC)

“What might not be a priority for HES, may well be a priority for the owner. This should be kept in mind when reviewing the priority level of a request: a “minor correction” might have a big impact on a place.” (Historic Houses Scotland)

“Given the constrained resource situation, this approach is supported in terms of managing changes for lower-impact cases. However, these sites should still be addressed within reasonable time limits, even if immediate action is not a priority. Indefinitely pausing non-urgent work merely stores up future problems; therefore, a baseline level of effort must be maintained.” (RIAS)

On process, two respondents expressed concerns about the risk of undue influence on HES, or of the approach encouraging poor practices by owners.

“I fully appreciate the need to prioritise effectively, but I do have concerns that priorities may be based on political persuasion.” (Individual)

“It feels like it has the potential to become manipulated by other stakeholders with private agendas for buildings and I would remain mindful of that.” (Individual)

Several respondents called for fairness, transparency and consistency again appeared in responses as being essential to maintain trust with HES, with local authorities arguing for a role in shaping a collaborative framework as well as consultation on cases:

“The basis for prioritisation also lacks transparency. Phrasing such as “we think are no longer justified” suggests a closed, internal process. Local authorities are often best placed to flag problematic designations and should have a clearer role in shaping review priorities.....A clearer, collaborative framework is needed—one that allows planning authorities and communities to raise concerns and understand how and when these will be addressed. Without it, the system risks being seen as opaque and unresponsive..” (Scottish Borders Council)

A few other suggestions arose in comments:

- Maintaining a degree of flexibility – there will always be exceptions to the rule (ALGAO Scotland).
- A fast-track system for perceived minor issues such as statutory address changes for listings
- Allowing scheduled monuments to be sampled by developers on the polluter pay principle *“to determine their value and the potential for development.”* (Individual)
- A simplified process of notification, rather than consultation, may be appropriately implemented for statutory address changes.
- Flagging listed building records where HES knows that a statutory address needs to be updated (as a middle ground to doing nothing).

OBJECTIVE 4: UNDERSTANDING OUR IMPACT - BY MARCH 2027, CAPTURE AND COMMUNICATE BASELINE EVIDENCE AND INSIGHTS INTO THE IMPACTS OF THE CURRENT SYSTEMS OF HERITAGE PROTECTION.

16: Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

There were 37 responses to this question. Many responses were supportive of gathering evidence of impacts offering constructive feedback. However, a small number of responses indicated concerns about this as a priority, and about potential for duplication of effort with similar work elsewhere.

Those who supported research in this area thought that it was important to gather evidence to inform policy development and to justify investment.

“Exploring the impacts of heritage protection, closing knowledge gaps through research, and inviting public feedback are not just good practices—they are essential if we want a system that reflects the full depth and diversity of Scotland’s history.” (Nellie Merthe Erkenbach)

As to the proposed initiatives, Dr Alistair Fair (University of Edinburgh) commented,

“Commissioning research is a good step, but a balance should be struck between working with external experts (e.g. academics, researchers etc) and developing in-house research expertise. HES should have a strong research unit able to tackle a range of sites/ages/types of building, and this will require investment over the long term.”

Responses from local authorities suggested that the research would need to collect evidence of the current systems on both designated and undesignated heritage. Furthermore:

“The assets themselves should be regarded as receptors of impacts, as well as people and sectors such as construction and farming.” (Orkney Islands Council)

However, several respondents provided more conditional support given resourcing challenges or actively queried whether this was a priority, set against, for example, physical protection of sites:

“Heritage benefits and impacts are unclear in many respects... I like the idea, but I am not sure that I would make it a priority in the face of resourcing challenges (unless it helped to unlock additional funding).” (Individual)

“As mentioned above, HES is stretched when it comes to workload and funding. Measuring impact is important, but it is also a time-consuming, complex process.” (Historic Houses Scotland)

“This seems sensible. HES already does have quite a heavy research base, although funding for physical protection of sites seems to be hard to come by. There’s a perception, right or wrong, that HES would rather spend money on research than on physical work.” (Individual).

Concerns were expressed about the risk of duplication of effort with other work and the need to ensure public and expert engagement in defining and interpreting impact.

“The first measure “to begin to measure the impacts of heritage protection” suggests that this has never been done before and ignores current monitoring initiatives undertaken through, for example, Scotland’s Historic Environment Audit.” (RTPI)

“Public money spending should have public engagement and advice taken into consideration.” (Julie).

On the details of this objective and the associated initiatives, there were suggestions around:

- the need for greater clarity on purpose, methods, and outcomes, together with understanding of how findings will influence future decisions.
- Focusing research on community identity, climate goals, energy efficiency, economic value, regeneration
- Looking at existing designated places and how well designation has “*protected the aspect of history and heritage of that place*” including how successful the battlefields and gardens inventories are and how protections could be improved.
- Considering outputs – for example a similar model for Scotland to *The Value of Heritage First Report* of the All-Party Parliamentary Group on Conservation, Places&People.

Additional suggestions included baseline setting, regular updates, research into suitable approaches to energy efficiency, and integration with natural environment data.

17: [By March 2027, we aim to gather baseline evidence on the impacts of heritage protection to enhance understanding. Please share your views on the research themes we are considering:](#)

There were 36 responses to this question. The responses suggest broad support for the proposed impact themes, especially when linked to policy development, securing sector funding, and improving public understanding.

Many respondents emphasized the importance of starting the research early and not delaying until 2027.

Respondents generally wanted balanced attention across all themes (not just economic); inclusion of undesignated sites in impact assessments and clear definitions and metrics for measuring impact.

“The baseline evidence gathered... will be invaluable... but consideration should be given to how the impacts from undesignated sites are included... Caution and careful caveating of the evidence used will be required.”

Comments on the individual impact themes proposed by HES included the following:

Economic - this impact theme is recognised as important (even if it should not overshadow other factors), especially in terms of tourism and local economies, reuse and revitalization of town centres, affordable housing, and conservation deficit and VAT issues. However, there was a perception that it was too built-heritage focused and that sectors such as construction and farming sector should be included. Also, there was a need to take account of indirect impacts (e.g. local cafes, and events), and how designation might empower property owners to monetize and maintain historic properties.

Wellbeing, social and community impact – there was support for exploring sense of place, identity, and memory; community engagement and representation; and cultural value and inclusivity. There were also calls for evidence on community wealth building; recognition of social value in planning decisions; and how designation influences support for local and underrepresented heritage (e.g., women’s history, cemeteries).

Environmental – there were mixed views on this impact theme. On the one hand, some see great potential in linking heritage (including landscape) to biodiversity gain, net-zero goals, and carbon savings through reuse. Others are skeptical about environmental claims, especially for remote or less-visited sites. Some too perceive impacts on heritage from net-zero policies (e.g. sites in upland areas which are no longer grazed and become inaccessible). Suggestions include quantifying carbon savings; considering biodiversity and landscape impacts; and addressing challenges in retrofitting historic buildings.

In terms of the methodologies for researching impacts, there were concerns around resource constraints. Some respondents perceived unclear outcomes in terms of how findings will inform policy or practice, as well as the need to avoid tokenistic or superficial data gathering with data being collected but remaining unused. Clear metrics and methodologies were needed to ensure meaningful results. The research also needs to take into account potential negative impacts.

Several responses indicated that they thought there was a case for a fourth impact theme for **Cultural Impact**, as this would align with the four pillars of sustainable development. Under this theme, emphasis could be placed on undesignated assets (often more visible and interacted with daily), impacts on the heritage itself (i.e. not just external benefits), and skills shortages in traditional crafts and conservation trades.

Simon Gilmour, Society of Antiquaries of Scotland, suggested that the research themes should themselves be integrated into the objective, to make it smarter.

Respondents also made suggestions for:

- Collaboration with other bodies (e.g., local authorities, Cadw, amenity societies)
- Making use of existing data from grant funders (e.g. Architectural Heritage Fund)
- Integration with existing data sources and programs
- Use of students and volunteers for data collection and skills development
- Follow-up promotional work to encourage appropriate property maintenance, particularly in conservation areas.

IMPACT ASSESSMENT

18: What impact do you think our strategy would have on people with the following characteristics?

Characteristic/Impact	Positive impact	Negative impact	No impact	Not sure	Not Answered
Age	9	0	11	9	10
Disability	10	0	7	12	10
Gender reassignment	4	0	16	9	10
Marriage and civil partnerships	2	0	16	11	10
Pregnancy/maternity	3	0	15	11	10
Race	8	0	10	11	10
Religion or belief	5	0	9	15	10
Sex	4	0	14	10	11
Sexual orientation	5	0	14	10	10
Socio economic background	10	0	8	11	10

20 respondents provided feedback in comments. Most comments were either neutral or cautiously supportive in tone, with a few expressing support for inclusivity and accessibility in the strategy. However, some respondents were uncertain about how the strategy would affect protected characteristics, citing a lack of clarity or detail.

On inclusivity and non-discrimination, some respondents (including ALGAO Scotland) stated that the current designation system is already inclusive and non-discriminatory, and they expect the proposed changes to maintain this.

Some feedback highlighted the potential for positive impacts, especially for race, socio-economic background, and disability, if the strategy leads to broader community representation and more inclusive heritage recognition.

“Making Scotland's built environment more diverse and inclusive will benefit us all.” (Individual)

“BEFS Members in general would like to capitalise on opportunities to simultaneously widen heritage engagement and tackle diversity and equalities issues by working with new community groups of theme and place in delivery of the Designations Strategy.” (BEFS)

A few responses stressed the importance of ensuring both digital and physical accessibility, particularly for disabled users.

“The strategy must consider accessibility for disabled users when accessing digital or physical records. This should not be an afterthought.” (RIAS)

There were calls to engage with diverse communities to broaden representation, in particular to address unconscious bias in heritage designation, especially in balancing elite/noble heritage with working-class and industrial heritage.

“Socioeconomic background should be considered at a strategic level when designating sites, particularly in balancing heritage linked to the former nobility or upper classes with that found in working-class industrial communities.” (RIAS)

Some respondents questioned the relevance of protected characteristics in this context or felt the strategy lacked sufficient detail to assess impact meaningfully. They argued for clearer articulation of how the strategy will address protected characteristics.

“Without the strategy specifying action in terms of these characteristics it is unclear how it could affect positively or negatively.” (Society of Antiquaries of Scotland).

19: What impact do you think the plan might have on people in island communities?

Option	Total	Percent
Positive	10	25.6%
Negative	1	2.6%
No impact	4	10.3%
Not sure	17	43.6%
Not Answered	7	17.9%

17 respondents provided comments. Most responses were neutral in tone or cautiously positive on the potential impact of the strategy on island communities noting potential benefits. However, several responses raised practical concerns or expressed uncertainty.

The following themes arose across the responses.

Recognition of Island Contexts - Several responses emphasised the need to acknowledge the unique challenges and opportunities of island communities, which vary from island to island.

“It is important that the strategy recognises the specific challenges and opportunities within island communities, and that these will vary from island to island.” (Shetland Island Council)

Heritage Engagement - Island communities may be more engaged with their heritage due to the concentration of population and assets, potentially amplifying both positive and negative impacts.

“Island communities tend to be more engaged with their heritage. Therefore, the impact may be greater, for good or ill.” (Orkney Islands Council)

Economic and Logistical Challenges - Concerns were raised about higher costs, limited access to contractors, and maintenance burdens that could be exacerbated by designation.

“Designating sites on islands may have a positive impact on the social heritage value of places... but may also lead to economic and logistical challenges.” (Iceni Projects)

“Higher costs for repair and maintenance and poor access to contractors... provide higher barriers to protection than mainland Scotland.” (Derek Rankine, BEFS)

Equity and Prioritisation - Some respondents worried that a focus on high development pressure areas could unintentionally disadvantage islands, which may be less densely developed but still face heritage pressures.

Potential Benefits - Designation could enhance social value, community pride, and tourism, but must be balanced with practical realities.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context?

There were 33 responses to this part of the question.

Option	Total	Percent
Positive impact	11	30.8%
Negative impact	0	0%
No impact	2	5.1%
Not sure	19	48.7%
Not Answered	6	15.4%

16 respondents provided feedback in comments. Mostly responses were cautiously positive in turn, with some expressing uncertainty and calling for clarity and alignment with regulation. A few responses noted that the impact would depend on implementation and how the strategy is embedded in policy and guidance.

The following themes arose across responses.

Clarity and Certainty - Many respondents welcomed the potential for clearer designation records, faster decisions, and better communication, which could reduce risk and uncertainty for developers and businesses.

“Clearer designation records, faster decisions, and better service will reduce developer risk and uncertainty.” (Scottish Borders Council).

“ A streamlined process that would be able to address a higher number of queries and requests would in the long term allow for more certainty in the system as records would be more accurate and up to date improving attractiveness to investors and developers, assuming a level of robustness is maintained.” (Pegasus Planning Group).

Regulatory Alignment - Several comments stressed that the strategy must align with existing legislation and guidance to be effective and meaningful.

“The strategy must conform with legislation and regulatory guidance, or it will have no value and could simply be ignored.” (Orkney Islands Council)

Economic Opportunity - There is recognition that better heritage management could unlock economic benefits, particularly for businesses in tourism, traditional building skills, and town centre regeneration.

“Positive economic impacts—particularly for businesses providing traditional building skills—must also be assessed.” (RIAS)

Implementation Matters - The strategy’s impact will depend on how it is delivered, especially whether it increases bureaucracy or supports smaller applicants and third-sector organisations.

Sector-Specific Impacts - Some noted that impacts may differ between private businesses and charities or community groups, and that these distinctions should be considered.

“The Designations Strategy could help people understand why their places are important, and focus more on local vernacular and areas of deprivation.” (Derek Rankine, BEFS)

21: Please provide any other comments on our strategy in the box below.

21 respondents provided comments.

Responses indicate that in general, there is broad support for the intent of the strategy, especially its focus on leadership, inclusivity and improving information.

“The need for a strategy is clear and the opportunities it provides are welcome.” (Simon Gilmour, Society of Antiquaries of Scotland).

The following themes come up in responses.

The consultation survey questionnaire - several respondents welcomed the opportunity to respond to the consultation. However, some commented that it wasn't a simple survey to follow; others (incl. BEFS) suggested in some areas there was insufficient detail, which made commenting difficult.)

Clarity and outcomes - Respondents want clearer articulation of links between objectives, initiatives, and outcomes. Several noted that the strategy lacks a strong outcomes framework.

“Although we are broadly supportive of the overarching objectives, initiatives and measures set out above, it is our view that “Outcomes” is a missing element throughout the consultation paper. For example, under Objective 2, although the headline objective touches on the reasons for enhancing data – i.e. “so that Scotland’s historic protected places are better understood and valued” – it does not go into any further detail to explain why this is important, whose understanding will be improved by the objective, and what outcomes will be achieved by meeting the objective through the initiatives. Likewise, although Objective 4 explains that it seeks to enhance understanding it does not go into any detail of whose understanding and for what purpose.” (RTPI)

Resourcing and capacity - There is widespread concern that the strategy is under-resourced, especially in local authorities. Calls were made for long-term funding, investment in staff, and support for rural and under-resourced areas.

“Resourcing will be key... a strategy that doesn't attend to the resources required to deliver it will likely fail.” (Docomomo Scotland)

Collaboration and leadership - HES is encouraged to take a more proactive leadership role, especially in working with local authorities, communities, and academia.

Expertise and staff development – Several respondents stressed the importance of retaining in-house expertise, supporting staff development, and avoiding over-reliance on external consultants.

Conservation Areas and local heritage – Concerns were raised about the decline of conservation areas and their management by local authorities, the need for updated guidance, and the importance of non-designated heritage.

Terminology and communication - Mixed views on terms like “protected” and “places.” Respondents want clearer language and stronger links to community benefits.

Inclusivity and representation - Several comments highlighted the need to better represent women’s histories, working-class heritage, and underrepresented communities.

Integration with other policies - The strategy should be better aligned with planning, climate, and community policies, and avoid becoming siloed.

“There is a huge job to be done advocating for the role of conservation in planning and promoting economic development, sustainability and placemaking.”
(Docomomo Scotland)

The following other comments came up:

- *“The Designations Policy is clear and good as it is, so don’t tinker too much with that!”* (Individual)
- Reverting to how listed buildings were categorized in 2016 as the definitions were clearer than now (AHSS)
- Reflecting intangible cultural heritage more clearly in designation criteria.

CONCLUSION

We are encouraged by the volume and quality of responses to our consultation, which reflect strong engagement with the topic, and a shared interest in the future of national-level designation in Scotland.

Delivery of national-level designations is a key function of Historic Environment Scotland (HES). At a time of significant change, we began a review of our designation function in 2024-25 with the intention of developing a long-term strategy for designation that is supported by stakeholders and the public and is fit for future challenges and opportunities.

The consultation responses show strong overall support for our proposed strategic direction with respondents endorsing the vision, mission, and objectives for national-level designation in Scotland.

However, respondents called for greater clarity - particularly around the scope of the strategy and its relationship with the roles of local authorities and property owners. We will address this in the final strategy by clearly defining the boundaries of the strategy and its alignment with other key documents, including *Our Past Our Future* (OPOF) and the *Heritage for All*, the HES Corporate Plan 2025-2028. We will also include clear outcome statements which some respondents identified as a key omission.

While the strategy focuses on HES's national designation function (as opposed to the role of local authorities in designating Conservation Areas), we also explored whether there is appetite for HES to lead a broader conversation about the future of the heritage protection system including areas such as planning policy and undesignated heritage. This idea received support, provided the conversation is well defined and inclusive – particularly of local authorities and communities. Collaboration and partnerships emerged as key themes throughout the responses.

One area of mixed feedback was our proposal to change how we refer to 'designation'. While some respondents – especially individuals – felt 'protection' was clearer and more accessible, others, particularly within the heritage and planning sectors, raised concerns about any change because use of the term 'protection' might be misleading and because 'designation' is embedded in planning policy, guidance, and even in legislation. We will therefore retain 'designation' as the formal term to describe the function. However, we will begin to use phrases like 'protected historic places' or 'protected places' as a collective term through some of our communications, as we think this will be more widely understood. Such phrases are already used in *Heritage for All*.

Many respondents asked more generally for greater clarity around terminology and language. We intend to ensure our language is consistent with the terminology used in the Historic Environment Policy for Scotland (HEPS). We also intend to give greater clarity around potential actions to meet our equalities commitments.

There was widespread support for the priorities identified for the next three years, but with differing views about how to balance ambition and realism about resourcing. Respondents also differed about whether improving existing records or identifying new designations should take precedence. Some questioned whether gathering evidence of the impacts of heritage protection should be a core priority for the Designations Service while others saw value in this work to inform policy and investment provided the intended uses are clear. We see this as a function-wide strategy rather than a strategy for a single team, with impact work potentially delivered through other HES initiatives such as work towards OPOF and our Research Strategy. The range of impact themes was generally welcomed.

Support for service reform was evident, with enthusiasm for innovation tempered by caution around the use of technology particularly AI. Respondents emphasised the importance of retaining human expertise and ensuring public engagement remains central and is not sacrificed in a drive for efficiency. We acknowledge these concerns and will reflect them in our approach.

Respondents broadly agreed that HES should prioritise its work. They also supported our proposed approach. For review cases, this means focusing on heritage risk and the impact on people and communities. For new designations, it involves identifying under-represented sites. However, concerns were raised about potential bias—particularly the risk of rural sites being overlooked.

Stakeholders emphasised the need for a transparent prioritisation framework and clear communication, so they can understand how to engage and what to expect. We acknowledge these points. Some local authority respondents called for co-development of the prioritisation framework. While we value collaboration with our local authority partners, we believe co-development is not appropriate in this instance, as the framework will apply specifically to HES's internal priorities.

Overall, this analysis confirms that the strategy must strike a balance between ambition and practicality with calls for more information on implementation. Most respondents were cautiously positive about the strategy's potential impact on people with protected characteristics, business interests, and island communities. Its success will depend on meaningful collaboration, clear outcomes, and sustained investment.

The insights gathered through this consultation will directly inform our final strategy.

ANNEX – ADDITIONAL COMMENTS IN FULL

On the following pages, you will find additional comments from consultees who consented to have their responses published. Individual names are included only where permission was given. The table below contains hyperlinks to each response. If a numbered question in a response is omitted, it means the respondent chose not to answer that question.

ID	Respondent
1	Individual
2	Individual
3	Individual
4	Individual
5	Individual
6	Individual
7	Individual
8	Nellie Merthe Erkenbach
9	Individual
10	Individual
11	Julie
12	Janine Macdonald on behalf of Callander Heritage Society
13	Association of Local Government Archaeological Officers (Scotland)
14	Individual
15	Individual
16	Orkney Islands Council
17	Individual
18	Architectural Heritage Fund
19	Jocelyn Cunliffe on behalf of Architectural Heritage Society of Scotland (AHSS)
20	Dr Alistair Fair
21	Scottish Branch of IHBC
22	Cheryl Roberts-Nairn on behalf of Aberdeenshire Council
23	Scottish Borders Council
24	Scottish Borders Council Archaeology Service
25	Catharine Kidd, Montagu Evans
26	National Trust for Scotland
27	East Lothian Council Archaeology Service
28	Andrew Puls on behalf of Highland Council
29	Simon Gilmour on behalf of Society of Antiquaries of Scotland
30	Hazel Gulliver, Scottish Power
31	Iceni Projects
32	Shetland Islands Council
33	The City of Edinburgh Council
34	Docomomo Scotland
35	Historic Houses Scotland
36	Jenny Munro on behalf of the Royal Town Planning Institute Scotland (RTPI)
37	The Royal Incorporation of Architects in Scotland (The RIAS)

ID	Your name
1	Individual
2	Individual
3	Individual
4	Individual
5	Individual
6	Individual
7	Individual
8	Nellie Merthe Erkenbach
9	Individual
10	Individual
11	Julie
12	Janine Macdonald on behalf of Callander Heritage Society
13	Association of Local Government Archaeological Officers (Scotland)
14	Individual
15	Individual
16	Orkney Islands Council
17	Individual
18	Architectural Heritage Fund
19	Jocelyn Cunliffe on behalf of Architectural Heritage Society of Scotland (AHSS)
20	Dr Alistair Fair
21	Scottish Branch of IHBC
22	Cheryl Roberts-Nairn on behalf of Aberdeenshire Council
23	Scottish Borders Council
24	Scottish Borders Council Archaeology Service
25	Catharine Kidd, Montagu Evans
26	Diarmid Hearn
27	East Lothian Council Archaeology service
28	Andrew Puls on behalf of Highland Council
29	Simon Gilmour on behalf of Society of Antiquaries of Scotland

30	Hazel Gulliver, Scottish Power
31	Iceni Projects
32	Shetland Islands Council
33	The City of Edinburgh Council
34	Docomomo Scotland
35	Historic Houses Scotland
36	Jenny Munro on behalf of the Royal Town Planning Institute Scotland
37	The Royal Incorporation of Architects in Scotland (The RIAS)
38	Derek Rankine on behalf of Built Environment Forum Scotland

Response ID: 1

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - This is a good change that makes better sense to a non-specialist audience

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Strategic engagement with amenity bodies, local authorities, and academia: utilise your already well-developed networks. For example, HES funds so many good projects that are successfully engaging different audiences in different places across Scotland, but is often bad at linking up these dispersed contacts into wider communities of interest that can work together collaboratively or at least be in dialogue with one another.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Please make the external proposals process clear and easily understandable. Speaking as an employee at a smaller heritage organisation, we not infrequently get cold-calls from members of the public asking a wide range of built environment questions (from very basic to quite technical) simply because they can't navigate the HES information online or they are desperate to speak to a human and our contact details are discoverable.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- From my perspective inside the heritage sector, I understand the need to prioritise, just please be clear about the process and where people should go to for more information or signpost to other resources and next steps.

17. Please share your views on the impact research themes we are considering - These are really good impacts to measure and HES will be best-placed to work out methodologies. This type of data would be of value and interest to lots of smaller organisations, as well, but they would struggle to resources to undertake the research.

18: What impact do you think our strategy would have on people with the following characteristics? - Making Scotland's built environment more diverse and inclusive will benefit us all

Response ID: 2

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - I agree - protection is better.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - I agree that current policy and guidance need to be reviewed, updated and where possible reduced. There are too many policy and strategy documents! It is confusing for the general public and even practitioners to have such a wealth of policy and strategy documents that are saying similar things in different ways. In the light of NPF4 Policy 7, which does a good job of setting out the principles and desired outcomes of heritage policy at a national level, I would suggest scrapping HEPS altogether. Many local development plans repeat NPF4 content. Given that NPF4 now forms part of every local authority's development plan, I would suggest that there is scope to simply refer to NPF4 Policy 7 rather than setting out similar policies. On the other hand, there is a strong need for enhanced guidance on a number of issues, for example to planning authorities on the designation and protection of conservation areas, or on emerging technologies for energy efficiency in traditional buildings. Digital technology provides the opportunity to revise and update guidance regularly without major consultations and complications.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - I absolutely agree. In some respects there is too much duplication at present and in others there are gaps in the system. The strategic conversation needs to cover the whole system.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- I think improvement in the data is a worthy aim. However, it is an enormous job and it may be better to prioritise key data (name/address/category/mapping/Statement of Interest) over the detailed description. Even when descriptions are detailed, they do not always capture every important detail about a structure. Gathering public feedback can be useful, but it needs to be checked and requires significant resource to manage it effectively. To some extent it might be better to focus training and resources on supporting local authorities to ensure that the

importance is recognised in the development control process (even if it is not identified in the detailed description).

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- This seems sensible.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- This is good in theory, but as always, those with the loudest voices (e.g. political representatives) will place pressure on you for particular sites. I think decisions on what has priority need to be more nuanced. How will you determine what is 'under-represented'? If there is a choice between directing resources at a high-quality building under threat and one that is under-represented but not under threat, surely the high-quality building should have precedence? Maybe a better way would be to make an initial sift assessment of quality/threat and give priority to community representations (e.g. community councils and amenity bodies) rather than individuals, so that there is already a local consensus in favour of the designation.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Changes in category or minor corrections should have low priority, I agree. Existing designations that are no longer justified or where inadequate records are having a negative impact on their management seem sensible priorities, if it is possible to identify them clearly.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Heritage benefits and impacts are unclear in many respects and are likely to remain nebulous. Fundamentally, the benefits and impacts must be considered positive, or designation systems around the world would have collapsed years ago. I agree that it is desirable to be try to quantify benefits and positive impacts as far as possible, but maybe limiting them to the three areas identified in the next question (17) is more realistic that considering all the factors. Are there other international studies that could serve the need or underpin the research in Scotland? Do you do this just once, or is it a study capable of regular update? Who is the target audience for the output? I like the idea, but I am not sure that I would make it a priority in the face of resourcing challenges (unless it helped to unlock additional funding).

17. Please share your views on the impact research themes we are considering -
As above, I think a baseline would be interesting but not a priority as a one-off study. Under economic impact, I'd have thought business and employment were other big positive considerations (skilled contractors, suppliers, architects, surveyors, planners, venue staff, researchers, archivists, conservators etc.)

21: Please provide any other comments on our strategy in the box below. -
Thinking and talking about what works and what doesn't work and how to prioritise scarce resources and do things better are an excellent thing. It will be impossible to please everyone, but seeking broad input and listening carefully to responses can only be helpful in informing a way forward. I meant to say earlier that the Designations Policy

is clear and good as it is, so don't tinker too much with that! The Managing Change series also contains useful info, but the series does need to be updated to better support NPF4 and guidance in respect of the climate crisis and technological developments. Local authorities desperately need updated support and guidance, particularly on designating and managing conservation areas and also on non-designated heritage assets. The recent changes to householder permitted development rights (replacement windows in conservation areas) seem to have been imposed by SG without much assessment of the potential harm to conservation areas, with little consultation with local authorities and surely sidelining HES? It would be good if the strategy could gather evidence on the impact of this change and if it is causing harm to conservation areas.

Response ID: 3

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Completely agree. 'Designation' and its derivatives are unclear terms. 'Protected' etc is much clearer

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - I fully support an inclusive approach to consultation. I would add in that there needs to be a separation from Governments and progressing in an effective, sensitive and unbiased way to protect Scotland's national heritage (& not allowing important historical areas to be sold off or made available to the highest bidder as a money-making opportunity).

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- Assuming full accountability is maintained, I endorse the initiatives and progress measurement.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- I have concerns about over-reliance on AI and subsequent 'automation of certain tasks' - what works these be?

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- I completely agree with it

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?-I fully appreciate the need to prioritise effectively, but I do have concerns that priorities may be based on political persuasion

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- It's vital to continue to seek and act on public opinion

17. Please share your views on the impact research themes we are considering - All are equally important considerations, and I have concerns that economic priorities will dictate progress.

Response ID: 4

Individual

7: Do you support the vision, mission and overall approach? - My biggest concern is the general lack of courtesy and partnership working from HES, you are not Scottish archaeology but a very small part of it. Most archaeology (something like 90%) is on un-designated sites yet from these documents you would imagine that you lead. It takes weeks and months to get a response which varies from officer to officer.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - This is a terrible idea because it implies that anything not designated is not protected.

9: Do you agree with our four priorities for the next three years? - All these are great but you must start by speaking to the rest of the sector and then deciding how you will work with them.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Make your forms easier to fill out, answer emails promptly and genuinely work with the rest of the sector.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - It is unclear what this means, what are you passing on and to whom. It might be worth comparing work loads between HES Case Officers and Council Archaeologists and Listed Building officers.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress? - I would prefer more funds were spent on increasing what we know rather than trying to improve accuracy on things we don't know and can't understand because the data cannot be improved without excavation.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress? - Your forms are hard to use for grants, your staff tend not to answer emails promptly.

14. What do you think of the possible approach we set out for prioritising external requests for new designations? - Yes good idea

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations? - Yes in theory, but often the lack of information is to do with the absence of information i.e. no research has been done

because of the designated status. I would allow scheduled monuments to be sampled by developers to determine their value and the potential for development. Let the polluter pay.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- I think you need to work with others more.

17. Please share your views on the impact research themes we are considering - these seem sensible

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - This is tricky, I think we need to understand the difference between a scheduled Castle Edinburgh/Stirling and a cairn. The former needs more protection than the latter as its economic potential is greater. At present this doesn't happen with scheduling.

21: Please provide any other comments on our strategy in the box below. - HES is at risk of becoming a process driven organisation with decisions left to the whims of officers. In 30 years of applying for Scheduled Monument Consent it has changed several times. Increasingly very few people in the organisation have any substantial experience of actual fieldwork and lack a true insight into their decisions.

Response ID: 5

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Protected is probably more misleading than Designated. It could include any site protected by anybody for any reason. Designated reduces the options and is more likely to refer to a legal Designation.

9: Do you agree with our four priorities for the next three years? - 10 years is not long term with reference to the historic environment.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Ten years is not long term in this context. Neither in terms of the historic environment itself or the existing procedures and approach taken.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - I don't really understand what this means. My experience is that the existing system is open to criticism but works well. The main problem I have experienced is with Local Authorities not having staff with an understanding of the historic environment but HES are usually in the background as a fall-back.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- This sounds sensible and a natural progression responding to changing technology etc.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Not sure how technology can automate or expedite tasks but that's probably because I don't know what the tasks are. I wouldn't want to think this took the people out of the system, as HES is so valuable because of the people and their expertise. Unless there is a plan to distribute this expertise to the local level it doesn't need to be altered.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- You will have to apply some system day to day but being selective should not be at the exclusion of property outside the priority areas. I don't know what greatest impact means, as it doesn't seem like an appropriate term to use in this context. If something is worthy of protection then somebody has to determine whether or not to give it, regardless of any wider aim to provide greatest impact.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Prioritising the removal of protection is not something I could support. There are cases where a protection is no longer justified but it's usually because of a failure of the existing system and often due to a lack of a mechanism to step in to help, including with financial support. Spending money to prioritise removing buildings appears to be admitting failure.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- This seems sensible. HES already does have quite a heavy research base, although funding for physical protection of sites seems to be hard to come by. There's a perception, right or wrong, that HES would rather spend money on research than on physical work.

18: What impact do you think our strategy would have on people with the following characteristics? - I don't understand this question. Race, age, sex, gender reassignment etc. are not in themselves Characteristics?

19: What impact do you think the plan might have on people in island communities? - I don't live on an island.

21: Please provide any other comments on our strategy in the box below. - This is not a simple survey to follow and I'm not really sure I understand some of the questions or proposals on which they are based. It needs to be followed up. Why not use some of the technology available now to distribute it more widely and clearly?

Response ID: 6

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Protected is a more understandable term than designated. Only snag is that legally protected is not the same as physically protected.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Seems reasonable

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - I agree with 'whole-system' approach.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- I am worried about the accuracy of data if the AI used is of the large language model type.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Seems reasonable

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- It sounds very subjective and could be seen as unfair.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- I wonder whether you already have the information available in your systems to do the prioritisation. Are we talking about management of records or of designated sites?What information does HES have about the current state of designated sites?

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- It is not clear to me how the initiatives will give you the information you need.

17. Please share your views on the impact research themes we are considering - Having just returned from visiting a scheduled site which was free of vegetation 8 or so years ago and is now inaccessible due to natural heritage being prioritised over cultural heritage, I am very worried over the effect of net zero goals on sites in upland areas which were grazed in the past but are no longer.

Response ID: 7

Individual

7: Do you support the vision, mission and overall approach? - Heritage is a niche. Yet it shouldn't be. The vast variety of heritage over a large geographical area implies

that heritage should be for everyone but that was not the case. For many years, it was the same people or groups talking and only a few people who were listening. Ensuring further collaboration with communities, no matter how small, is vital for gaining new interest and future-proofing heritage for the next generations.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - I personally like 'Protected Historic Places' as it is direct and covers everything in minimal words. I studied and worked in the built environment for years and honestly never quite understood the term 'Designation' when referring to protected places.

9: Do you agree with our four priorities for the next three years? - When asking many people about Historic Environment Scotland they tend to only think they're involvement is mainly taking care of A-Listed properties and historic sites. When I work with traditional building owners they are surprised to hear that there is documentation on taking care of their property (and providing advice on energy efficiency) available for free online. Many have reported back that the Inform Guides were a great start to learn about their home or work place.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - The initiatives sound good but I think they need to expand on who is delivering them. I went to a few HES events last year and found that it would be the same circle of speakers. I will say on occasion companies outside the organisation and local authorities presented and gave a great insight to what other, more localised help was available.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - I definitely agree! It is just as heart breaking to see undesignated sites near/on the outskirts of conservation areas that have been poorly maintained or repairs, or worse completely obliterated of any character. The use of uPVC, concrete and removal of traditional building materials (due to lack of maintenance or "easy maintenance" should be greatly discouraged/disallowed. With the carbon cycle analysis of products, and the push for carbon negative, it may not be long until we are using timber windows in new builds (here's hoping!).

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- I approve of the initiatives above. I would like to see HES provide a more hands on approach, i.e. using they're inspection technologies to provide tailored building/site inspections with recommendations on how to approach repairs and maintenance.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- HES has many case studies and informative documents that are very good, however, due to the restraints in finding experiences and appropriate skilled work force is making it difficult to encourage suitable approaches. I would like to see HES take a more hands on approach within city/town centres to encourage

appropriate repairs and maintenance. Many building surveyors are not conservation accredited (and even then I have seen atrocious advice given) and therefore the lack of knowledge provided to traditional property owners is causing rapid deterioration in the building fabric. Monumentenwacht in the Netherlands is a great example of providing unbiased advice for a subsidised cost. It would be amazing if Scotland had this too!

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- I like it, I think this could encourage a word-of-mouth approach to communities and other under appreciated sites. Many estate buildings are being converted into multiple occupancy (which is not a bad thing) but the surrounding lands are sadly being destroyed with unsympathetic modern buildings being built on it. If HES provided a small document on how to approach new builds on a historic site, for example, where they have allocated design profiles (such as slate roofs, no taller than one/two stories, timber double/triple glazed windows, etc.) it would provide aid to architects (even conservation accredited ones) to understand what they can allow for and use this as a challenge to create a considerate design.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- I struggle with this approach as I would like to know what the process is for what is no longer needing specific protections.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- I would like to see more research (and funding) available for suitable approaches towards energy efficiency. There is a few case studies and retrofit document, however this mainly approaches full/large renovations where the property is unoccupied/derelict (which is great) but it would be nice to see more progression for traditional home owners. Is external/internal wall insulation that is recommended on EPC's actually appropriate for my 1890's traditional B-Listed property with original plaster or my external exposed whinstone walls?

17. Please share your views on the impact research themes we are considering - There are many ""data gathering"" forums nowadays and most of the data is left sitting on a shelf never to be seen again. If collected data, I would like for a plan to be set out prior to the collection process so that no funds or data is wasted. I approve of the subjects stated above.

Response ID: 8

Nellie Merthe Erkenbach

7: Do you support the vision, mission and overall approach? - As a writer and cemetery blogger who has spent years exploring and documenting Scotland's lesser-known graveyards and women's histories, I welcome the aim to better reflect Scotland's diverse heritage by 2035. However, I am deeply concerned that housing and planning decisions continue to override the protection of historic artefacts, particularly in rural and

fragile cultural landscapes. Unless heritage designation is given real weight in planning policy, we risk losing irreplaceable evidence of everyday Scottish lives—especially those of women, whose stories are often marginalised in mainstream narratives. Protection must mean more than recognition; it must include enforceable safeguards.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views.

- I strongly support the proposal to use the term 'protected historic places' rather than 'designated sites'. The word 'protection' carries a much clearer emotional and practical meaning, especially for the general public. It conveys the idea that these places are actively being looked after, not just labelled. In my experience, terms like 'designation' are vague and often misunderstood, whereas 'protection' implies responsibility and care—something deeply needed when advocating for underrepresented heritage, such as women's graves, local folk traditions, and unassuming but culturally rich sites. Language shapes action, and this shift would be a step toward more inclusive and effective heritage policy.

9: Do you agree with our four priorities for the next three years? - Statement of Support: I fully support all four objectives outlined in the consultation. As a writer and heritage blogger focusing on Scotland's cemeteries and women's history, I particularly welcome the long-term commitment to clarity, inclusion, and transparency.

Objective 1: A collaborative and inclusive conversation is vital if we are to ensure that hidden or overlooked stories—especially those of women and rural communities—are not lost. Heritage protection must reflect the full breadth of Scotland's past, not just its monumental history.

Objective 2: Improving the accessibility and accuracy of records is essential. In my own research, I have often struggled with outdated or incomplete data, especially regarding burial grounds and lesser-known historical figures. Making this information usable and publicly available would be a game changer.

Objective 3: A more responsive and transparent public service would allow local communities and researchers alike to engage with protection processes in real time. This could empower people to become active stewards of their local heritage.

Objective 4: Measuring impact is key. Without clear evidence of what works (and what doesn't), we risk repeating mistakes or overlooking opportunities to preserve vulnerable parts of our cultural fabric.

Together, these objectives signal a much-needed shift toward a heritage strategy that values depth, diversity, and dialogue.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress

- As a writer and cemetery blogger deeply rooted in the local histories of Scotland—especially those often forgotten, such as women's lives and rural graveyards—I strongly believe that local input is vital to meaningful heritage protection. The proposed initiatives are promising, especially the emphasis on community engagement and evidence-gathering through Talking About Heritage and policy reviews. Strategic engagement must go beyond formal institutions to include local voices,

storytellers, and grassroots historians, who are often the first to notice when a historic place is under threat. Digital platforms can be a powerful tool for this—if used to listen as much as to broadcast. All too often, historic sites are dismissed or downplayed in favour of short-term economic gains like job creation through development. But this is narrow thinking. Making historic places accessible, visible, and better understood benefits local economies in the long term—especially in tourism-dependent regions. Cultural heritage, when protected and well-communicated, becomes a lasting economic and emotional asset to communities. Investing in collaborative research and addressing gaps is equally important. There are still so many stories, particularly of women and working-class communities, that remain undocumented and unprotected. These initiatives offer a chance to bring them to light—and give them the recognition they deserve."

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - I agree with the proposed 'whole-system' approach to heritage protection. As an author and heritage blogger focusing on Scottish graveyards and marginalised histories, I believe this integrated strategy is essential to avoid a fragmented or inconsistent treatment of historic places—particularly those not formally designated but locally significant. However, for such a system to work, there must be a broader base of historical knowledge and appreciation, not only among policymakers but also within local authorities and planning bodies. Too often, decisions are made without a deep understanding of the cultural or historical value of a site, especially when its importance is not immediately visible or monumental. Education, local storytelling, and public engagement must be part of the conversation—otherwise, we risk losing the very essence of what makes Scotland's heritage so rich and diverse.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- We have identified a historic site in our neighbourhood that is currently under threat from housing development, and despite repeated efforts, the concerns raised have failed to be heard. The site lacks a clear, detailed record of its cultural and social significance, which makes it vulnerable in the planning process. This experience underlines just how urgent it is to review and prioritise records with inadequate descriptions, especially in areas under land use pressure. Better documentation isn't a bureaucratic detail. It's a form of recognition—and often, the first line of defence.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- While I understand the need for more efficient processes, I believe public engagement and listening must come before streamlining. As someone actively involved in highlighting forgotten sites—especially graveyards and places linked to women's history—I've seen how easily heritage risks go unnoticed when systems become too automated or risk-based. Shorter reports and faster workflows may help with volume, but they can miss nuance, context, and lived experience—especially in communities that don't have formal heritage voices. Technology should be a tool to amplify human insight, not replace it. More brains, less tools. I believe heritage protection must start with people—not platforms. No amount of AI or digital processing can replace

the insight of those who know a place intimately. We need better conversations, deeper listening, and more human judgement in the process. Technology can assist—but it must never lead. Without people who care, heritage becomes data. And data alone doesn't protect anything.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- It depends entirely on how you select. Prioritising under-represented sites in areas under development pressure is the right idea—but only if selection processes are transparent, inclusive, and grounded in lived experience, not just desk-based criteria. As someone who writes about overlooked histories—especially women's lives and graveyards—I know how easily such places fall through the cracks when selection frameworks favour the monumental over the meaningful. If you truly want to protect what matters, involve the people who know these places best. Otherwise, “selective” risks becoming another word for “strategic neglect.”

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- I strongly urge caution when reviewing existing designations that may appear “no longer justified” based on outdated or incomplete records. Just because something is poorly documented doesn't mean it lacks value—it may simply have been overlooked. A powerful example is the Chapel of St Kentigerna, known in Gaelic as Cill a' Chaoin-tearn, near Loch Duich. This site is exceptionally rare: it is associated with a female saint, and chapels dedicated to women in early Scottish Christianity are few and far between. Yet this particular site has remained largely undocumented—and it still waits to be properly uncovered, studied, and recognised. To lose a place like this because of inadequate records would be a devastating failure of heritage protection. I agree that minor administrative changes can be deprioritised—but when it comes to reviewing full designations, especially for under-researched and underrepresented sites, the approach must be careful, inclusive, and historically informed. We cannot afford to erase what we haven't yet understood.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Yes—absolutely. Exploring the impacts of heritage protection, closing knowledge gaps through research, and inviting public feedback are not just good practices—they are essential if we want a system that reflects the full depth and diversity of Scotland's history. Communication must be ongoing, open, and multi-voiced. The more transparent and inclusive the system becomes, the more resilient and relevant it will be—for today's communities and future generations.

17. Please share your views on the impact research themes we are considering - Yes to all of these research themes—but please, faster than March 2027. Understanding the economic, environmental, and social impacts of heritage protection is long overdue. As someone who works with forgotten sites—especially cemeteries and places tied to women's history—I strongly support a deeper look at community value, cultural representation, and sense of place. Economic and environmental aspects matter, of course—but so does identity. People connect to the land through stories, memory, and

emotion. If we want heritage to serve communities, we must measure what truly matters to them—not just what’s measurable on a spreadsheet. Let’s not wait two more years to get started.

21: Please provide any other comments on our strategy in the box below. - I deeply appreciate the care and thought being invested in shaping a long-term strategy for the protection of Scotland’s heritage. It’s a complex and essential task—balancing historical integrity, community perspectives, environmental goals, and economic realities. As an author, cemetery blogger, and former student of Scottish history, I welcome this open and inclusive consultation. Much of what shapes Scotland’s identity lies not only in its grand landmarks, but in quieter, often overlooked places—graveyards, chapels, and landscapes filled with personal stories. While men’s histories are well represented, I believe there is still much work to do to shine a light on the lives and contributions of women, who have too often been left at the margins of official records. A truly meaningful heritage strategy should reflect the full spectrum of Scottish experience—men and women alike, from all walks of life. Thank you for opening this important conversation, and for inviting those who care deeply about Scotland’s past to help shape its future.

Response ID: 9

Individual

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- Great and will add value to all future personnel with an interest in their heritage.

21: Please provide any other comments on our strategy in the box below. - Best of luck implementing it and I hope you are fully supported.

Response ID: 10

Individual

7: Do you support the vision, mission and overall approach? - This sounds very much like the status quo.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Agreed. Single words used for legal context can hinder public understanding when a more appropriate word or term would be suitable and more widely understood.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Setting priorities with the listed stakeholders is understandable

however HES should consider room for any emerging stakeholders who may add value to the process.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - I agree to a point, and I understand why local authorities are critical in this part of the conversation. However to implement meaningful change HES will need to have the Government involved. The legislation for heritage buildings in Scotland and indeed other parts of the UK is now in need of an update. If you are serious about conversation and proactive change for the future you are missing an enormous opportunity by keeping things localised.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- Record keeping is a key undertaking and also can be a painful one. Whilst its easy to go digital we should be wary not to discard what we have on paper. A strategy to ensure digital records can be reformatted in the future is also worth consideration. Should current systems become obsolete HES will need to be on the front foot.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Resource is a huge challenge for most public sector organisations. The potential for an increase in cases where involvement is required should be monitored. A streamlined approach is not always easy due to other stakeholders and protocol. Changes to decision processing MUST receive appropriate public communication coverage.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- An understandable approach. The reality is to be successful there needs to be focus and HES cannot do everything with the resources it has to deliver.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- I am not sure I support this approach. It feels like it has the potential to become manipulated by other stakeholders with private agendas for buildings and I would remain mindful of that. Pressure is all around us and should not influence decisions where possible.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- This is will be resource intensive however a welcomed approach.

17. Please share your views on the impact research themes we are considering - Agree with the above.

18: What impact do you think our strategy would have on people with the following characteristics? - If a site becomes a key place to visit for a particular group then numbers of visitors may significantly increase overnight. Depending on global situations at play there is also potential for sites aligned to particular groups to be at risk

of damage or protest occupation from others. Global events can have significant localised outcomes as we have seen in recent years.

19: What impact do you think the plan might have on people in island communities? - The management of relationships between organisations like HES and the inhabitants of Scotlands islands is very important, and should be carefully approached.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - Hard to say. Where commer

Response ID: 11

Julie

7: Do you support the vision, mission and overall approach? - Your mission can be perceived as flaky at times. In areas that ring fencing has been in place for a prolonged period, communities and visitors have lost a bit of faith in your organisation.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Designation or protection are two words that can encompasses many meanings. An open approach moving forward would educated the public on what you refer to, and what you are actually actively doing to engage with the public and ensure accessibility.

9: Do you agree with our four priorities for the next three years? - I feel that communities in Scotland are keen to see you implement actions as easily as you implement strategies. Many look forward to the free sites surrounded in Heras fencing being open for public engagement and not just the pay in ones.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - It sounds great on paper, we will see if you can produce the results for the communities you appear so keen to engage with.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - You are struggling and failing on many levels of protecting what is already 'in your care". Might be a suggestion to sort out your own heritage protection gaps before looking over the fence to others.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- Seems to be a very short time span to achieve the amount you claim. Setting manageable aims and objectives ensures more people are engaged and trusting the process

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- If it genuinely improves the service you provide, investing public money may be beneficial, especially if there is openness and clarity throughout the process

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Each request should be handled on its own merit, irrespective of geography.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- As my last response.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Public money spending should have public engagement and advice taken into consideration.

17. Please share your views on the impact research themes we are considering - Environmental ideas are flaky since so many important historic cites and areas are very much off the beaten track.

Response ID: 12

Janine Macdonald on behalf of Callander Heritage Society

Publish response with name

7: Do you support the vision, mission and overall approach? - Sounds good, but how quickly you can be responsive depends on various factors

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - For heritage professionals, I would insist on current branding, however for the public it makes sense to rename the designations to include 'protected' in the title

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Agree with digital platforms but some social minorities might not have access to the internet to participate . Agree, good to get ideas and trends from academia plus those actually dealing with designations at the council level. Some community froups are interested in protection their local sites (e.g. via Adopt a Monument), so would be good to include tose

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - I agree with those councils who employ an archaeologist and has the understanding of designated sites & those to be protected

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- Sounds good but will take a long time to review this. How will this be reviewed, by HES or councils? Not all information might be on Canmore, other details might be held at local level. How do you prioritize this? Do you start with famous designated sites first and working your way down? Will you include any additional findings from SCRAP, Adopt a monument etc?

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Dynamic risk based approach sounds great, but how will this be conducted, at council level or HES level? Which site would you give priority if you have 30 applications that need to be responded within 3 months? Short visual overviews are great for anybody's understanding instead of a 150 page document.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Depends how you define under-represented sites. I am not sure what you mean with this if it might be a site of local significance but not nationally?

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Good

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Great idea, but who will pay for this? Research is not cheap to conduct

17. Please share your views on the impact research themes we are considering - Perfect

18: What impact do you think our strategy would have on people with the following characteristics? - Hard to say what the impacts will be as it depends on the individuals and their level of understanding and wanting to understand it

19: What impact do you think the plan might have on people in island communities? - Hopefully a positive impact

21: Please provide any other comments on our strategy in the box below. - It sounds like a well-thought through strategy, however I am not sure if the timelines are realistic

Response ID: 13

Association of Local Government Archaeological Officers (Scotland)

7: Do you support the vision, mission and overall approach? - ALGAO Scotland welcomes the commitment from Historic Environment Scotland to plan ahead for the future of heritage protection, to take into account the challenges the world is currently

facing, and to collaborate with partners in doing so. This latter point is especially important as the responsibility for the protection of sites which may become protected in the future, or which may stop being designated in the future, lies largely with the local authorities, and it is only through collaboration that we can ensure the appropriate outcomes are achieved.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Under National Planning Framework 4, Policy 7, what are currently described as ‘undesigned’ assets (and which form approximately 90% of the historic environment) are afforded a form of protection through the oversight of the local authority archaeology services, especially within the development management process. While ALGAO Scotland agrees that the term ‘designated’ is poorly understood by the public, the interpretation of ‘protected’, used by itself, will also cause confusion, while creating the impression that the vast majority of the country’s heritage is not protected at all and does not matter. Within the current local authority processes for managing land change, such as development or forestry creation, the applicants seek permission for their intended actions in advance, thereby allowing ‘protection’ of heritage assets through refusal, re-design, or mitigation. This applies to both designated and undesigned sites, and is a proactive approach to the management of the historic environment. Designation on the hand, while an initial deterrent against harm, is generally more reactive in nature, responding to such assets only once damage or destruction has occurred. This does not provide the implied ‘defence’ that the proposed word ‘Protected’ suggests, as most would interpret the meaning to be more proactive. An example of the difference would be a cropmark site that is designated is still not ‘protected’ in the truest sense of the word as plough damage can still occur through the continuing landuse following the initial designation. Key to this issue is the current lack of a wider understanding of the term ‘designation’, and that lack of understanding would continue with the use of the word ‘protected’. In the first instance a programme of public engagement and education would be the preference rather than a change in wording that could end up resolving nothing. This would also avoid having to make numerous changes in texts which reference ‘designated’ across plans, strategies, policies and legislation. Consideration would also need to be given to other designations such as the Inventory of Battlefields, and the Inventory of Gardens and Designed Landscapes which are also referred to as designations, but which are also not ‘protected’ from change. Should HES still wish to pursue a name change from ‘designation’, which ALGAO Scotland strongly urges against, then we would suggest instead, ‘nationally protected historic places’ and ‘nationally protected place records’ as these would help to clearly differentiate between national and local protection levels as afforded to heritage assets within the planning system, and beyond.

9: Do you agree with our four priorities for the next three years? - ALGAO Scotland agrees with all four identified priorities, and looks forward to working with Historic Environment Scotland where appropriate to help achieve them.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - ALGAO Scotland welcomes the collaborative approach being proposed. From a wider heritage policy point of view, we would ask for early engagement in the review of the Historic Environment Policy for Scotland (HEPS) given its importance. Beyond that, and ever mindful of changes in staffing between organisations over time, it would also be worth ensuring relevant contact details are up-to-date and available, again something that all organisations should be mindful of and willing to assist in.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - The question of how undesignated sites are managed in the planning system, including those deemed to be regionally significant, is at the heart of ALGAO Scotland's remit and role within the planning process. To bring Scotland into line with the rest of the UK, and to ensure consistent recognition and protection for undesignated sites in the future, there must be a strategic endeavour to make Historic Environment Records, and the local authority archaeology services which maintain them, statutory. As such, ALGAO Scotland supports the intention for HES to lead the strategic conversation around what the future 'whole system' approach to heritage protection will be, and the recognition of the importance of maintaining local authority expertise.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- ALGAO Scotland welcomes the proposed initiatives to improve the accuracy of designated records. Where appropriate, working with the local authority services augmented by Historic Environment Records would aid with this work, and ALGAO Scotland requests early engagement to discuss how best this can be achieved.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- ALGAO Scotland recognises the increasing demands for ever-quicker response times to consultations, in particular national planning infrastructure applications. We therefore welcome the commitment to review and streamline process by Historic Environment Scotland, and look forward to working collaboratively to help achieve these aims.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- In theory this approach is pragmatic and deals with the issue of under-represented sites. The approach however should also ensure that it carefully considers regional variation, and relative regional rarity, so that it avoids introducing an unintended area bias. Furthermore, key to understanding what site types may be under-represented and worthy of designation relies on a regional understanding of what constitutes the historic environment resource in any given area. To facilitate this Historic Environment Scotland must appreciate the importance of Historic Environment Records in this approach, the regional expertise of the local authority archaeologists,

and continue to support Regional Research Frameworks in order to ensure there is the evidence base for making these decisions.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- While the proposed approach is reasonable and one which ALGAO Scotland supports in cases where the designations are no longer justified, there will always be exceptions to the rule owing to the particular circumstances of a case. If there is flexibility within the approach to react in a timely manner to these exceptions, then we do not envisage any issues going forward. We would raise concerns though should the lack of detailed information for a record be the sole justification to de-designate.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- ALGAO Scotland welcomes the proposed initiatives. We would suggest that consideration of the dual benefits of heritage protection be included within the baseline evidence and communication, namely both the benefits to the heritage assets themselves, and the additional benefits for the natural environment given that the two often go hand-in-hand.

17. Please share your views on the impact research themes we are considering - The baseline evidence gathered for these topics will be invaluable in demonstrating the worth of heritage protection. Given that designated sites rarely exist in isolation from the undesignated, consideration should be given to how the impacts from both are considered in the studies, even if it's a basic narrative around the supporting contributions the undesignated sites are making. There are also complexities behind some of these impacts, such as property values, which extend well beyond what effect the historic environment may have. As such caution and careful caveating of the evidence used will be required to ensure the results are not dismissed by those outwith the sector.

18: What impact do you think our strategy would have on people with the following characteristics? - ALGAO Scotland views the designation and protection of heritage sites across the country as being inclusive and non-discriminatory already, and the proposed changes will maintain that approach.

19: What impact do you think the plan might have on people in island communities? - ALGAO Scotland views the designation and protection of heritage sites across the country as being consistent between the mainland and the islands already, and the proposed changes will maintain that approach.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - ALGAO Scotland views the strategy as having a positive impact as it will help bring clarity and certainty to the overall approach to protection going forward, while improving existing processes where it can.

21: Please provide any other comments on our strategy in the box below. - No comment.

Response ID: 14

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - I think this is excellent. Designation feels like jargon and can easily be misused . The new options are more descriptive of place and the plain English approach is more accessible and easier to understand.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Yes I think a collaborative approach that generates a community of practice that shares and explores work in real time will deliver a rich heritage sector with shared resources. A sector that's builds together rather than competing. This approach will maximise impact through a strengths based approach and deliver results that reflect community values. Taking about the work and promoting heritage through all mediums is imperative to bring people along w the process

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- Standards and consistency in approach are import and should be adopted as best practice moving forward being careful not to create busy work. Public feedback and input is import at and has the potential to increase the capacity of the sector workforce .

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- This sounds great. See comments in previous

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Yes the approach should be dynamic and flexible and positive discrimination toward areas that are lacking in information or where there are known gaps on focus areas that have been identified as strategic objectives should follow strategic plans and deliver ... become embedded in best practice approaches

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Yes this it's important as internal values and external pressures change over time

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- These all sound very valuable yes

17. Please share your views on the impact research themes we are considering - Economic can feed into areas that are prioritised because they're more observed but may dominate over the others. An equal amount of attention should be give to each areas . It's easier to forget about some aspects of they're out of site and out of mind.

Response ID: 15

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - I think protected is rather weak leaving it open to misinterpretation. Designation is more formal and strength needs to be maintained. Weakened words cause damage. For example what is the level of protection being offered? The wording suggests just a note with no care or action would be possible.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Sounds fine but action and detail are essential

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - Needs definitions and must include education so that the importance is clear and promoted.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- Sounds good but detail and education are needed.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Fine

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Probably providing it does not lead to neglect and is reviewed regularly

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Sounds like an excuse to remove places and not a positive view. Yes review and educate and strengthen.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Important but including education and not an excuse to stop designations

17. Please share your views on the impact research themes we are considering - If it strengthens the case good but not a as a substitute for the protection and education role.

18: What impact do you think our strategy would have on people with the following characteristics? - Most of these are buzzwords in this context. There must be no discrimination in any way.

Response ID: 16

7: Do you support the vision, mission and overall approach? - It is welcomed that HES is planning ahead to designate more diverse heritage sites and provide accurate and accessible information about them to engage communities. HES's commitment to support planning authorities is also welcomed. More than 90% of Scotland's heritage is not designated and only protected through the planning system and therefore the Local Authority, and it is stated in various national guidances that not all sites worthy of designation have yet been designated. Therefore HES's stated commitment to collaboration and support must be real and we look forward to working in partnership with HES as appropriate.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Abandoning 'designation' etc and introducing another term, the use of which will not have been standardised across legislation, national and local heritage and planning frameworks and guidance is not acceptable. It would be more useful for HES to explain 'designation' etc in its strategy and communications instead. OIC will continue to use the terms 'designated' and 'undesignated' etc. Use of the term 'protected' will imply the other 90+% of Scotland's heritage places are unprotected. Should HES insist on using 'protected' then this should be qualified, for example 'nationally protected' to differentiate sites protected through statutory designation and sites protected through the development management process and planning.

9: Do you agree with our four priorities for the next three years? - As overarching priorities, these are agreeable. OIC will work with HES where possible.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Given the importance of HEPS and DPSG, we expect early engagement in the review of these documents and policies. Inclusivity in the process and taking on board the views of local authorities and others to reach an agreed set of priorities is vital for the protection of Scotland's historic environment, whether designated or undesignated.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - We welcome that HES will enable discussions about the whole heritage protection system. This needs to be a collaborative strategic conversation, especially taking on board local planning authorities and their archaeologists, given their leading role in protecting Scotland's historic environment through the planning process. To bring Scotland up to the same level of protection as the rest of the UK, where Local Authority Historic Environment Records and the historic environment services that maintain them are statutory, there must be a strategy to make these services in Scotland statutory also, as part of this strategic conversation about the future 'whole system' approach to heritage protection led by HES.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- We welcome HES improving the accuracy of their records and bringing them up to standard. By stating that only 7% of their records are up to standard, HES has identified what the focus of their efforts should be over the next 3 years, not diluting their limited resources with various reviews, gathering public feedback, understanding gaps etc. Perhaps these should commence after records have been brought up to standard. Should HES wish to find a way to prioritise records to bring up to standard, they will need to give careful thought to criteria used to identify such records. Do areas of high development and land use pressure include forestry, windfarms, agricultural changes as well as building development, for example? Working with local authority records and expertise will help HES improve their record accuracy and identify high priority areas within each authority area.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Streamlining response process to external requests/consultations is to be welcomed, especially in terms of demands for quicker response times to designation and planning applications. Suggest that a success measure of how many times HES is consulted/receives external requests and HES response times is created in order to measure the success of the streamlining.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Prioritising responses is a sensible approach, as long as people are aware what will be prioritised. Care must be taken in deciding what are under-represented sites – this will be relative and vary on a regional level. Therefore, Regional Research Frameworks should be consulted as well as Local Authority Archaeologists as part of the process. What are the criteria for identifying areas of high development and land use pressure? Do these areas include forestry, windfarms, agricultural changes as well as building development, for example?

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- While the proposal to review existing designations is reasonable, if the information is substandard, how can it be decided if existing designations are no longer justified? Inadequate records should not be used as justification to de-designate sites. Compared to the number of HER records held by Local Authorities (far more than HES) and the number of staff have dealing with them (far fewer than HES), we suggest HES focus on upgrading the 93% of inadequate records. What are the criteria for identifying areas of high development and land use pressure? Do these areas include forestry, windfarms, agricultural changes as well as building development, for example?

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Collecting evidence on the impacts of the current systems of heritage protection requires research concerning the impacts of protection on designated and undesignated sites, much of which is through the planning process. The

assets themselves should be regarded as receptors of impacts, as well as people and sectors such as construction and farming.

17. Please share your views on the impact research themes we are considering - Collecting evidence on the impacts of the current systems of heritage protection requires research concerning the impacts of protection on designated and undesignated sites, much of which is through the planning process. Including impacts on biodiversity, the natural environment and net zero aspirations is commended. The identified topics in Economic impacts is not wide-ranging enough – it appears to focus on the built historic environment. Sectors such as construction and farming should be included.

18: What impact do you think our strategy would have on people with the following characteristics? - We think that the designation and protection of heritage sites is inclusive and non-discriminatory, and the proposed changes will maintain that approach.

19: What impact do you think the plan might have on people in island communities? - In very general terms, because island populations and heritage assets are more concentrated than on Mainland Scotland, island communities tend to be more engaged with their heritage. Therefore, the impact may be greater, for good or ill.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - The regulatory context should inform the strategy, not vice versa. The strategy must conform with legislation and regulatory guidance, or it will have no value and could simply be ignored. This should not prevent the strategy containing aspirations in which changes to current regulations might be identified. The strategy will have no impact on business if it has no status embedded in guidances etc.

21: Please provide any other comments on our strategy in the box below. - By stating that only 7% of their records are up to standard, HES has identified what the focus of their efforts should be over the next 3 years, not diluting their limited resources with various reviews, gathering public feedback, understanding gaps etc. Perhaps these should commence after records have been brought up to standard.

Response ID: 17

Individual

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - I think a designated building should be known as a protected historic building or as a listed property as these are terms that I find more commonly used by the public when referring to designations.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - I think more involvement with the current owners and potential owners of listed properties as well as more of a presence in local heritage organisations.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- No problems with the proposed initiative

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- No problem with the initiative

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- I think it is a great idea as there are many underrepresented areas in designations such as mid and late 20th century domestic architecture (e.g the Dorran bungalow and post modern housing developments like the Werberside estate in Edinburgh).

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- I think there should be emphasis on keeping designations on the register instead of prioritising their removal and instead enhancing their designation description and information.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- My thought is that you should look at designated places and see how well have you protected the aspect of history and heritage of that place.

17. Please share your views on the impact research themes we are considering - I think there should be a theme on the site itself to see how it's designation has impacted the fabric of the site such as has the organisation been strict enough on alterations to the site and how has this impacted the history and heritage of the site.

21: Please provide any other comments on our strategy in the box below. - I think there is a lot that could be learnt on how differently the Scottish designation system is run from the English, Welsh and Northern Irish designation systems.

Response ID: 18

Architectural Heritage Fund

7: Do you support the vision, mission and overall approach? - As a funder (the Architectural Heritage Fund) supporting communities in re-using historic buildings our interest is in using designation records to inform our own decision-making and prioritising of funding awards. We are therefore keen to see records develop in such a way that responds to how society values these buildings; for listing to reflect ever-changing perceptions and sense of connection with our past, as represented through our built environment. We welcome the collaborative approach described as this task requires both the expertise and strategic oversight of HES, as well as the involvement of

communities (of place and interest) in helping define what matters to them. Our comments are largely centred on listing as we are almost exclusively concerned with supporting communities in re-using historic buildings (rather than other types of designated asset).

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - The term protected buildings/places/records would certainly be more accessible to the public. We do think the term 'listed building' is well understood amongst most of our applicants, however use of the word 'protected' could consistently be applied across different types of designated asset. It may also help convey a more positive tone; list/schedule/inventory describe the mechanism for recording sites whereas 'protected...' links with the special qualities of the building/site in question, and the intention to care for that asset. It is therefore a more meaningful word which gets across a positive intention around how that asset will be managed.

9: Do you agree with our four priorities for the next three years? - It may be useful to frame the objectives in the context of what issue/problem they are seeking to address. This may help link them back to the Vision/Mission.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - In terms of gaps we regularly hear from groups regarding buildings that are unlisted, but could well be listed; most typically in more remote areas. Given that designation is one of our assessment criteria we suggest targeting of gaps as a key priority. We prioritise projects in areas of multiple deprivation and have recently become aware of research undertaken by Historic England (2023) indicating that more deprived areas have fewer listed buildings per head of population: <https://historicengland.org.uk/whats-new/research/back-issues/geographic-exposure-to-heritage-reported-visits-and-income-deprivation-in-england/> This is a key area of interest for us and we would strongly welcome an equivalent initiative in Scotland. We are in touch with communities on a daily basis and encourage groups to develop capital projects in the context of local place priorities. For unlisted buildings we ask groups about how they value a building for its architectural or historic interest. We therefore understand how groups value their local heritage and would be happy to contribute to wider discussion on managing undesignated assets. Applications for funding for unlisted buildings can help indicate societal values around assets 'at the edge' of our thinking of what constitutes 'heritage'.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - We welcome a whole system focus, recognising the role of designation in decision-making. As funders we would be pleased to be involved in discussions.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- In terms of improving information, as a funder we are keen to understand why a building has been designated, so the 'statement of special interest/significance' is particularly valuable. It is helpful for us to understand the

rationale for listing, with succinct reference to the criteria in 2020 guidance; Architectural (design and setting); Historic (age and rarity, social history, association with people, events). We appreciate the combined oversight of the national body in determining 'significance' coupled with input from communities around how they value a particular heritage asset. The latter is important for us because we are looking to invest in community-led re-use of these assets; this is more likely to succeed where there is a strong sense of connection with the building in question. We welcome the intention to review records with inadequate statements of significance but recognise that this is a very large task. We support prioritising areas of high development pressure and also strongly encourage prioritising areas of multiple deprivation; this will help us in our objective to target funds towards projects in the top 20% most deprived areas of Scotland.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Under success measures it may be useful to show how the results of considering external proposals inform wider thinking around designation, particular in gap areas. Arguably external proposals play a valuable role as 'indicators' of ever-changing public interest in heritage.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- We would welcome a targeted, proactive approach to address under-represented sites. As part of this, it would seem appropriate to prioritise external requests in accordance with this approach.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?-We would welcome a targeted, proactive approach to address under-represented sites. As part of this it will be necessary to de-prioritise less impactful activity. It will be helpful for communications to explain the reasoning for focussing the very limited resources of the HES team to where there is more strategic need.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- We would suggest firstly defining the component parts of the heritage protection system and work with sectoral colleagues to define indicators of success. It would be useful to identify key drivers (which may be threats or opportunities) influencing heritage protection (for example Church of Scotland disposals as a thematic area), major infrastructure projects, climate change impacts – especially targeting coastal and west coast areas), current funder priorities.

17. Please share your views on the impact research themes we are considering - Scope of research could be informed by existing data. For example, as a funder we gather data on the social and heritage impacts of community-led regeneration projects. We would be happy to contribute our data, some of which is longitudinal, to discussion on creating a baseline of evidence on how we are collectively caring for Scotland's heritage.

Response ID: 19

Jocelyn Cunliffe on behalf of Architectural Heritage Society of Scotland (AHSS)

7: Do you support the vision, mission and overall approach? - Q7 Overall Approach – yes, but Vision is too long and should be re-written. HES's vision (Corporate Plan 2025-28) is Heritage for All and HES's purpose is 'to investigate, care for, and promote Scotland's historic environment, for the benefit of people and communities everywhere.' One of the outcomes under the priority Scotland's Heritage is 'enabled good decision-making for Scotland's protected places'. Alternative Vision : Enable good decision-making for Scotland's protected sites and places, with accurate, accessible information for informed decisions, for the benefit of people and communities everywhere.'

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Protected historic sites', rather than 'protected historic places' unless you are referring to conservation areas when you might refer to a 'protected historic area.'

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - The AHSS would support a more strategic and proactive HES. Our major concern is that if legislative changes are proposed we risk losing more than we gain. A recent event at the Scottish Parliament showed poor understanding of the importance of heritage protection by at least two MSPs and while this may not be typical it shows there is work to be carried out raising awareness before even consolidation legislation is considered.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - Yes – the AHSS would be happy to engage in a conversation about the whole system of heritage protection. Our focus tends to be on listed buildings and conservation areas but we have major concerns that undesignated traditionally built properties, whether stone built tenements or terraced stone houses or harled vernacular cottages, originally with slated roofs and timber sash and case windows, are not being appreciated and properly maintained as they are undesignated and not valued as they might be if listed or in a conservation area. An apparent lack of concern from the local authorities and HES for the listed and within Conservation Area examples of these buildings only adds to the neglect and mis-valuing of all.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- Canmore, Pastmap and the original website of the Dictionary of Scottish Architects have been really valuable. We are concerned that architectural history research will be disrupted by the hiatus between the end of June 2025 and when Trove is fully functioning. Rather than spent time auditing to see if benchmarks have been achieved why not set out to update the list descriptions, training

a team of data and architectural history interns over, say, a 5 year period, working under experienced HES staff. There are opportunities here for involving the universities, amenity societies and other external academics who can add value to the record.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- We understand that designation requests take a long time because of the requirement to consult and potential appeals. We are in favour of the public being encouraged to propose designations and would like to see HES encourage this. HES would only benefit from this approach if they have the resources to deal with the cases expeditiously otherwise they will damage their reputation further. We are concerned that HES are already proposing to tie themselves to deadlines they will not meet.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- The AHSS thinks each case should be considered on its own merits. Does 'under-represented sites' relate to examples of building types eg a cooling tower? If there is a building which meets listing criteria we would like to see it listed. If a building is considered worthy of listing in one part of Scotland, and there is something similar but perhaps with different regional characteristics on the opposite side of the country our preference would be that both be listed. We hope that in the future there may be tax benefits for listed buildings.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- We are extremely wary of this approach. Once a building is listed our preference would be that it remain listed and the owners seek listed building consent if they wish to alter the building. Our experience has been that conservation area status has offered too little protection against, for example, the replacement of traditional timber windows with UPVC windows and the erosion of the building/site/place 's original qualities. All the buildings that are listed, category C, were reviewed in the past and statutory and non-statutory C status was determined and our view is that when HES's resources are stretched this should not be a review priority. A campaign to educate owners and their professional advisers about correct approaches to traditional materials, window upgrades, like for like repairs could reduce the need for LBC applications for changes. We should also like to emphasise the importance of context. The purpose of Conservation Areas and indeed Category C was to prevent the 1960s situation of the odd iconic heritage building surrounded by a sea of re-development. It was recognised then that this would provide a false heritage and history and this is still the case today if there is to be significant delisting on the basis not that their listing was wrong when it occurred but that they wouldn't be listed today under the new selection criteria. We would like to emphasise the importance of Category C listed buildings and their proper maintenance and repair should be encouraged.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Insights into the impacts of current systems of heritage protection – this goes beyond designation strategy. These are laudable initiatives, but it

is hard to see how the impact can be measured. For a period of about one year the AHSS ran a project which compared Forth & Borders objections/comments with consented schemes to try and gauge the effect of our comments. Sometimes modified schemes were approved but we were not aware of revised drawing being submitted as in some cases they were not on the planning portal until the report of handling and the decision letter were posted. You could review the different local authority planning officers' responses to HES Heritage Managers three types of responses and see if the comments which refer to determining the case in accordance with guidance or where advice is given that points to HES making points that are material, but because HES says 'we do not object' but the following are material considerations, the planning officer takes that as an HES 'did not object'. See also Q21.

17. Please share your views on the impact research themes we are considering -

The AHSS works across Scotland, supporting the appropriate use and adaptation of historic buildings, towns and landscapes. Our strapline is 'Speaking for Scotland's Buildings'. We want all Scotland's citizens to discover more about Scotland's built heritage and take an active part in its preservation. We are committed to encouraging public understanding and appreciation and the protection of Scotland's historic built environment. We have reservations about the proposed research themes. We would like to see effort and money put into expanding the early very concise two or three line List Description entries. You could use architectural history students which would be great training /skills development for them. We would like to see more promotional work carried out in relation to encouraging property maintenance and repairs using properly detailed traditional materials, especially in conservation areas which are being degraded by incremental changes, using inappropriate non-traditional materials especially replacement windows, doors and rainwater goods in UPVC, re-roofing using Spanish slate, car run-ins which involve widening gateways, fitting electric gates, adding impermeable parking surfaces etc. This work does not contribute to net zero commitments or biodiversity. In what can be loosely described as 'leafy suburb conservation areas' we are concerned that unsympathetic new build blocks, which equate to 'densification', are neither preserving nor enhancing the appearance of the conservation area.

21: Please provide any other comments on our strategy in the box below. - We welcome reconsideration of the use of the word 'Designations'. HES's management of change in the planning system needs to become more effective. When HES responds to planning authorities in respect of listed building consent applications there are three types of letters written – no comment to the proposals as submitted, comments with points that should be addressed but including the words 'we do not object' and the third, rare type 'we object'. The wording of the middle type should be addressed to make it clear that local authorities need to work with the applicants to get the proposals revised to respond to the points raised by HES. The way the second type of letter is written does not send a clear enough message and we have seen handling reports from local authorities which report the HES comments as 'HES did not object' and ignore the HES observations/recommendations. HES changed the definitions of how buildings are

categorised, A, B or C in 2019. The 2016 categories were clearer, in the opinion of the AHSS, and we would like to see those definitions brought back into use and given more publicity to increase awareness of the importance of protecting the historic environment.

Response ID: 20

Dr Alistair Fair

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - I agree that the term 'designation' is opaque and not commonly used beyond HES, but the word 'protection' might be misunderstood as meaning that a site/building cannot be changed. It is already the case that many people think that 'listing' is equivalent to the imposition of a preservation order. Would a term like 'nationally recognised' be better? E.g. 'nationally recognised historic building / site / archaeology'??

9: Do you agree with our four priorities for the next three years? - My only comment on revisiting old designation records relates to resource and whether this work should be secondary to investigating new sites, especially (late) twentieth-century ones. I would suggest that it is more important to invest in new research and designations.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Research is key, and the example of the then English Heritage's Post-War Steering Group in the 1990s as well as its ongoing series of research reports shows the impact of such work. There is capacity and willingness within academia to work collaboratively with HES. A number of historians are working on late-C20th Scottish architectural history, and there have been collaborative PhD projects co-supervised by university partners with HES. However, I understand that no further projects of that kind are now being entertained by HES, which is a shame.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - Local authorities lack resourcing and in some cases in-house expertise.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- AI is often inaccurate and also is environmentally disastrous in its energy use, so it is a bit disappointing to see HES embracing it uncritically.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Heritage risk - one issue is that HES will not currently consider sites where there is an active development proposal, something which seems to be at odds with the idea of considering sites according to 'heritage risk.' I would support the abandonment of the 'active development proposal' refusal to consider. HE in

England will consider sites where a proposal exists and in fact is more likely to do so than sites where no threat is imminent.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- See above - this seems at odds with current policy not to consider sites with active development proposals. Selectivity is fine in principle but should not be too prescriptive, and 'lack of knowledge' e.g. of 1990s architecture should not be used as an excuse not to consider (something which might be implied by 'deliver the greatest impact with our available resource')

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- I am not entirely comfortable with the idea of 'no longer justified' which implies that owners who have wilfully under-maintained or compromised the significance of their building/site will now be 'rewarded' with de-designation,

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Commissioning research is a good step, but a balance should be struck between working with external experts (e.g. academics, researchers etc) and developing in-house research expertise. HES should have a strong research unit able to tackle a range of sites/ages/types of building, and this will require investment over the long term.

17. Please share your views on the impact research themes we are considering - Can there be collaboration with HE/cadw and amenity societies to pursue these themes efficiently?

21: Please provide any other comments on our strategy in the box below. - As a historian of twentieth-century architecture in Scotland, who has researched and published on this topic, I am grateful for the opportunity to contribute to this consultation but note that there has been relatively little formal engagement with academia in the process thus far. There is considerable expertise in Scottish architectural history and archaeology within academia, and, importantly, understanding of how to communicate that work to wider communities and indeed to work collaboratively with those communities. HES could benefit from this. The elephant in the room is funding - selectivity, AI etc are no match for the need for sustained long-term funding.

Response ID: 21

Scottish Branch of IHBC

7: Do you support the vision, mission and overall approach? - In essence, the IHBC Scotland Branch does support vision, mission and overall approach- however we recognise the need for reform but we wonder whether the vision, mission and overall approach is bold enough. While there is nothing in particular to object to about the

proposal, the devil will be in the detail in the working out of the strategic vision, which will be critical and whether this is deliverable with existing or modestly enhanced resources.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - In general any document should conform to Plain English as far as is possible, taking account of the necessarily technical nature of some designation content. We are surprised that “designation” as a term is poorly understood but would have no objection to the term “protection” being used. Although, considering the poor understanding of current terms, the concept of employing “protected” could reinforce the mistaken assumptions about preservation in certain aspects. As such careful selection of correct terminology needs in depth stakeholder analysis.

9: Do you agree with our four priorities for the next three years? - We do not disagree with the proposed Objectives. The diagram does not, however, reflect the scale of the objectives. It would be our view that “Improving our information” has significant priority and resource needs allocated. Given, it is this information that is used on a day-to-day basis in relation to planning and regulatory functions that is of key importance.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Objective 1- Looking ahead. It would be our view that the envisioning and development of priorities needs to encompass a longer period than a 10-year priority. It would not be unreasonable, given the change of thinking/ direction/ approach that may be required to think in terms of a 15- 20-year period built up of 5 year action plans, with scope to respond to parliamentary cycles. We welcome review of Designation Policy and Selection Guidance and this needs to happen in conjunction with relevant case law. Further advice needs to be provided that clarifies the intent and extent of the use of the 2015 amendment 4A of the 97 PLBCAS Act with relevant legal input. As we increasingly move from subjects for listing consideration having solid wall construction with their apparent structural reliability, into later more life-limited technologies, there is a need for those designating to better understand construction technologies and the integral part they play in design and contribute to architectural interest and to source expert input accordingly. The approach and detail provided in designations needs to be carefully considered and weighed in the context of varying local capacity to interpret historic fabric. We welcome opportunities being explored to work with local authorities, local learned groups, history groups and others to capture pertinent information and again recognise that coverage of such groups is variable. We welcome the use of digital platforms, but it is imperative that issues around compatibility of data sets is discussed at an early stage with local authorities and other users who maintain their own records. This is particularly important if there is any intention to define polygons rather than points. The proposed initiatives under this objective, appear logical, however consideration should be given to a wider encompassing of key stakeholders (such as IHBC (Scotland) and external consultants). In terms of how HES intend to measure progress – perhaps there is a need also to stipulate short- and medium-term priorities which would allow a better perspective on direction of travel.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - We agree in principle that a “whole system” approach should be captured. Notwithstanding that the consultation to date suggested no real appetite for legislative change, a whole system approach may well require reconsideration of primary legislation. It will be necessary for example to consider: The extent to which designations reflect statutory weighting that may be required in relation to protection and management; Where group or street-length listing have been carried out prior to conservation area designation and the intention is to remove some of those listings, the efficacy and adequacy of existing conservation area protections will need to be considered; Where the intent is to increase public involvement, ways of defining and weighting local interest and intangible heritage within decision making processes; If moving to polygon definition of assets primary legislation may be required or may need to be adjusted; balancing public involvement and views with careful academic consideration of proposed designations will be challenging and the mechanism for this is not clear.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- Objective 2- Improving our information- by March 2028: Given the current state of the statutory lists and other designations, the format in which they are currently in with associated mappings, the redefinition of scope, removal of ambiguity and editing and re-presentation of information, we think that to have regularised data by March 2028 is ambitious and would certainly require significant front-loaded additional resource input. We support engagement with users, although often users will not have a complete understanding of the inconsistencies in the records pertaining to their areas. These tend to emerge from time to time. A mechanism for reporting such issues and an understanding that they will be addressed timeously is important and needs to be properly resourced. To a March 2028 deadline scaling approaches using technologies is essential. There will remain, however, a need for editing and review of data and a suitable resource needs to be identified to allow that to happen timeously. We welcome prioritisation where statements of significance are inadequate or non-existent. In addition to development pressure, a further consideration might be the extent to which respective local authorities have inhouse expertise to interpret significance. The proposed initiatives under this objective, appear logical, however consideration should be given to investigating stakeholder navigation of the platform to be used for the delivery of protected place records and spatial data. In terms of how HES intend to measure improving information – perhaps there is a need also to measure the new revised approach is being used by stakeholders which would allow a better perspective on direction of travel. The proposed initiatives under this objective, appear logical, however from a 7% figure the ambition to achieve detailed descriptions (not clearly requested in the initial consultation report) and detailed statements of national importance and of special interest will require extensive stakeholder consultation for all sites. This is simply impossible. In terms of how HES intend to measure improving information – perhaps there is a need also to measure/evaluate the

new revised approach is being used by stakeholders which would allow a better perspective on direction of travel.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Objective 3- Improving our service: It would be desirable to see systems and processes improved and with improved timelines, however, as was noted in the consultation, this has to be set against any requirement for greater public engagement and the right of appeal. It would be good to better understand the public and user perspectives on what they consider to be efficient processing. Efficient processing will necessarily require fuller exploration and exploitation of technologies. Demystifying- It is not always clear the basis on which listings are being made except via long-form reports of handling. It is not always clear from text how attributes of special interest are being weighted and how these fit into national context criteria for listing. Greater transparency and clarity is required.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- We agree that risk is a factor that should be considered where prioritising listing, however, we note that HES will often not list where “plans” for development exist- which could in themselves place historic assets at risk and has seen buildings assessed as being of listable quality by HES demolished. Clearer guidance is required that sets out the circumstances in which HES will or will not designate property in the context of “plans” and discussion is required with local planning authorities around the sequencing and timing/ service of Building Preservation Notices. Any adjustment to designation protocols should factor in the interface with Certificates of Intention Not to List and Building Preservation Notices. The proposed approach under this objective, appear logical, and we agree prioritisation is needed, and less reliance on reaction to external requests. HES should have confidence in its own skills and records.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- We agree that minor adjustments should generally take less precedence than reconsideration of designations that are no longer considered justified. The exception here would be street address adjustments which are integral to the legal designation and can generate uncertainties about what is covered by a designation. GIS mappings/ polygons/ address points do not always match from system to system and there may be a legacy of inadequate data acquired from street level survey or from old systems built into some listings. A full justification for delisting would be required setting out why a historic asset no longer meets the national criteria and this needs to be associated with consistency checking both locally and across Scotland, liaison with local planning authorities and local heritage organisations which may have information not currently identified within a statement of interest should be an integral part of any proposal to de-designate. Enough time needs to be provided to allow a proper assessment and factor in all relevant information.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Objective 4- Understanding our impact: No objection to

the Objective but HES needs to be mindful of the implication of changes of approach to designations on the ground and unintended consequences.

17. Please share your views on the impact research themes we are considering -

We consider that collation of Economic, Wellbeing/social/community and Environmental information is work that should be carried out by other parts of HES and we don't see the usefulness of this as a particular priority for the Designations Team. Clearly the prospect of listing very much in future is going to be hamstrung by continual reassessment of what is already listed, throwing all into doubt, and with ever-longer list descriptions and statements of importance delivered top down from above. IHBC members, few of whom are in HES, appear to think there is more scope for engaging LA, the third sector and private consultants- that's how I tried to frame responses to other consultations from IHBC and not HES. And what about local lists and BPN pushed by

Response ID: 22

Cheryl Roberts-Nairn on behalf of Aberdeenshire Council

7: Do you support the vision, mission and overall approach? - Yes, although the change from 'designated to protected' sounds good in the Vision but could be misleading in the Mission and Approach. HES don't protect 'all' heritage, owners of sites do. HES identify what is important and then support people through clarity of what a designation means, advice and guidance and grant. HES are there to support those protecting sites they feel are important. They don't protect them, themselves. Owners of assets need to take a positive responsibility for their role in heritage management and this needs to be clear. That said under Mission it is very positive to see that the collaborative approach to heritage management is identified and a collaborative approach to heritage management is a theme we welcome.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - As above, 'protected' infers that you (HES) will look after a heritage asset whereas the function of 'designation' is to identify that it is important and therefore should be protected. As with conservation area designation, it is only the first step in protection and management. We are not convinced the name change is essential. Owners of the asset need to be clear that 'they' are the ones who will protect the heritage asset, and HES will support them with that by being clear why it is 'designated' and providing them with the knowledge and guidance to manage them well. There are also un-designated heritage assets, which should equally be protected, and are through the function of the HER and the Archaeological advice that follows through from that. Needs a bit of thought here.

9: Do you agree with our four priorities for the next three years? - Agree with the four identified priorities with the following observations. Objective 3: need to ensure this

is as focused on good outcomes, and not just quick decisions. Objective 4: Understanding our impact: A few weaknesses in the current system to be aware of, there is a lack of understanding about how HES are viewed by elected members and the public, and therefore the significance of commentary from HES on heritage management issues. Particularly through development management, but also the function of a designation description and the role of local authority in defining curtilage. There is also a lack of understanding around the role of those advising into the development management process in regards conservation officers function on advising on the technical performance of a building and retrofit. This is seen as a Building Standards not a planning function, so a bit of wider education around how a conservation officers advice may differ from a planners on technical and performance matters.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Very positive to see greater engagement with other bodies that are involved in heritage management, particularly local authorities, who manage a significant proportion of heritage that HES are not involved with. Agree with an evidenced based approach to set priorities, ensuring those priorities are agreed and published and that the decision making is inclusive. A few observations, making the technical teams, and information more accessible to local authorities and the public is increasingly important as the industry grapples with more technical specification around retrofit. Physical, in person retrofit examples should be a key focus and partnering with local authorities to achieve this would be useful. The time scales are ambitious when looking at an inclusive process, will need to ensure a good structure is set up to feed in. COG and ALGO provide a solid platform to have this discussion with local authorities.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - Strongly agree with a 'whole system' approach. It is very helpful to have one inclusive voice but how you implement this will determine its success. As an example, conservation areas are a challenge for local authorities to actively manage due to the extensive supporting information required for the legislative designation and review process. So, a more centralised digital, interactive platform that explains to residents what living in a conservation area means, support in producing more interactive (standardised) documentation to support designations and reviews would allow local authorities to focus on pulling out the significance of a place, outreach and positive management rather than drafting documentation. However, if HES are perceived to lead on this and then don't make comment into the planning process, this could confuse elected members and the public. Undesignated sites are wholly managed by local authority Archaeologists and so again it would be a concern in relation to how you are involved, how that is perceived by the public, decision makers. Statutory HERs would be a very helpful step in this process to ensure it has the profile and resource it requires to be effective. Not unsurmountable but important considerations. Could work but need to consider how, structurally would inhouse local authority staff need to work more closely with HES, who is commenting on what, what is the relationship how is that viewed externally and through elected members. How do you deal with local authorities

with limited resource, more shared service agreements to ensure consistent coverage across Scotland.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- Strongly agree with this objective, trying to make good decisions on poor quality information is a huge challenge currently. This is an area of work that local authorities could support as they will hold information on those designations through the HER, conservation area reviews and other internal records. They will also have dealt with multiple applications on designated assets so could support the review of designations and the development of statements of significance. They could further support the de-designation of assets that are no longer of merit, and identify assets that should have their own designation and not be open to the interpretation around curtilage.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Where we agree that some processes could be improved e.g. using AI for example to support decision letters for more standard applications (but potentially with better signposting to supportive guidance). This needs to be in tandem with improving the information supplied to applicants and ensuring that when sites are of particular interest the time saved on other processes gives staff time to engage more fully in applications and sites that need it. Site visits are something that reduced dramatically post COVID, site visits and in-person discussions with applicants (when it really matters) are invaluable on certain applications. So, agree with streamlining of processes but in tandem with improved quality of outcomes. Supportive information to inform changes to the historic environment is one of the weakest areas of the application process i.e. good quality statements of significance, heritage statements, design statement. Applicants, agents and developers are reluctant to understand the heritage they are working on, and it is often carried out as an afterthought. The more support and guidance HES, in collaboration with the local authority, can provide (even if it's a charged for service) the better decisions could be made through the planning system. This would also provide vital information upfront that could speed up the decision-making process and lead to better outcomes. Need to ensure this is focused on better outcomes not just more efficient. We do agree this needs to be measurable."

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- This would appear to be sensible but would require looking at how local authorities can support this process. They could support de-designation work in their area (a quick assessment of sites they know no longer meet the criteria) and provide information on proposed designations that may assist in understanding the likelihood of the site meeting the criteria. They also have an important role in understanding regional variations. The HER could significantly support this process.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- This seems sensible, local authorities

could help as detailed above. Although do need to be cautious that where there is less development pressure, the quality and accuracy of designations does not become so poor that heritage management in those locations suffers.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- It is a positive that the impact of heritage designations is being considered, the more data we have on the impact of heritage then the greater the justification for our management processes. We frequently use the following and a similar model for Scotland would be helpful. 'THE VALUE OF HERITAGE FIRST REPORT of the All-Party Parliamentary Group on Conservation, Places & People'. These are some of the key areas of data we would see as beneficial. Property values ; tourism; Economic; Net Zero ; Wellbeing; Placemaking

17. Please share your views on the impact research themes we are considering - Agree strongly with the areas identified, place is a significant area for planning and so data on how the historic environment supports place would be of great assistance. Should also consider the wider social and policy impacts of the heritage sector. The learning from our past to inform our future and how research into the historic environment informs modern government policy, technological advancements, modern medicine etc. In essence without recording our past and maintaining sites of historic interest as a direct physical record of our past. We would lose the ability as a society to learn from our past. Once it's gone its gone. We often protect sites that we don't currently fully know what it could tell us because either an area for study has not arisen yet, or no one has fully researched the asset. A few examples to illustrate the point. Modern concrete technology is being informed by analysis of the concrete mix used in the Pantheon in Rome. Study of Human Remains has informed a better understanding of diseases across the world based on where people lived, how they lived and how they migrated across the globe. Study of previous pandemics helped inform Policy around Covid. Lime analysis has helped inform a better understanding of traditional construction and how these buildings can be better maintained.

18: What impact do you think our strategy would have on people with the following characteristics? - Designation and protection of heritage sites across the country is inclusive and non-discriminatory already, and the proposed changes will maintain that approach.

19: What impact do you think the plan might have on people in island communities? - If areas under less development pressure see a reduced focus, this could disadvantage more sparsely populated places.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - Better management of our historic environment that is evidenced based and with clear supporting information and data, will ensure an increased opportunity to unlock the positive benefits of heritage.

Response ID: 23

Scottish Borders Council

7: Do you support the vision, mission and overall approach? - The overall approach is welcomed. The strategy rightly places emphasis on greater accessibility, public confidence, and responsiveness to social and environmental change. However, the mission's reference to "Scotland's most significant historic places" is problematic. While it may aim to reflect prioritisation, it risks reinforcing the idea that heritage is a closed set of already-designated places — undermining moves towards inclusivity and local significance. Many communities value places that don't yet meet current designation criteria, or that sit outside traditional hierarchies. A more nuanced phrasing would better align with the strategy's goals.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Shifting to "protected historic places" for external communications is a positive move. It improves public understanding and aligns more clearly with the intention behind designation. However, "designation" remains important in legal, planning and policy contexts and should continue to be used in those spheres. Dual use, with clarity over audience, is the best way forward.

9: Do you agree with our four priorities for the next three years? - The priorities are appropriate and strongly supported. In particular: Improved data and clearer records (Objective 2) are urgently needed. Measuring impact (Objective 4) will be essential to justify heritage protection and inform future funding and policy. That said, there is a fundamental tension running through the strategy: unless there is a credible plan to resource delivery at local authority level, many of the objectives risk being unachievable. Local authorities are already under significant pressure. A more ambitious strategy must be matched by investment in the capacity of those expected to help deliver it.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - The proposed initiatives are helpful and appropriate. The use of Talking About Heritage, the HEPS review, and broader engagement with amenity bodies and academic partners is supported. However, the 10-year strategy horizon is surprisingly short, particularly given that early years will likely focus on restructuring and internal process refinement. A longer timeframe (e.g. 15–20 years) with structured review points could provide stronger strategic value and enable more transformational change. Inclusivity should be embedded not just in who is consulted, but in what types of places are considered as priorities.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - A whole-system approach is vital. National designations sit within a broader framework that includes conservation areas, locally significant assets, and undesignated archaeology. However, this must come with

recognition of the resourcing pressures at local level, particularly where local authorities are expected to manage and enforce protections that sit beyond statutory designation. The suggestion of HERs becoming statutory designations has been raised in some conversations, but we would strongly caution against such an approach. This would place an unsustainable burden on local authorities. HERs are dynamic, evolving records — not static lists — and their strength lies in their flexibility. Strengthening their recognition and integrating them more explicitly in planning guidance would be more productive than formal designation.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- The proposals under Objective 2 are critical and fully supported. Poorly worded, outdated or vague listings are a major issue for local authority heritage services, creating uncertainty for both applicants and officers, and increasing delays in decision-making. We support: Alignment with FAIR principles. Prioritising records in high development pressure areas. User engagement to identify problematic records. Investment in data technology, AI, and more effective public interfaces. We would also support tying data improvements into grant mechanisms — e.g. requiring better local records or statements of significance as part of funding conditions for maintenance, development or reuse. This could help close information gaps while delivering real benefit.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- We welcome efforts to improve service delivery, but the current proposals under Objective 3 seem overly focused on internal efficiency, with limited clarity on how this will support collaborative working or enhance the quality of advice provided to planning authorities. While streamlining and use of technology are understandable, the move toward shorter assessments and a risk-based approach risks diminishing the depth and robustness of heritage input. We rely on your advice to be thorough, proportionate and context-specific—particularly when balancing heritage impacts within complex planning decisions. Any reduction in quality or clarity may undermine our ability to justify decisions at appeal or inquiry. The criteria for prioritisation also require more transparency. Without clear, shared frameworks, there's a risk that lower-profile but locally significant cases—especially those involving non-designated heritage or community value—may be overlooked. The proposed success measures are limited. Publishing a revised approach and tracking participation do not demonstrate effectiveness or real-world impact. We would welcome more meaningful evaluation, including feedback loops with local authorities and shared performance metrics. Improving service delivery must go beyond internal reform. It should include a clear commitment to quality, transparency, and collaborative working with planning authorities and communities alike.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- We support efforts to address under-represented heritage, but the proposed selective approach raises concerns. Prioritising designations based on development pressure risks shifting the focus from significance to threat.

Designation should remain rooted in heritage value, not planning context alone. This reactive approach may overlook important assets in rural or less pressured areas, further entrenching geographic and thematic imbalances. The lack of clarity on what constitutes “greatest impact” is also problematic. Without transparent criteria or a published framework, it will be difficult for local authorities and communities to understand how requests are assessed or why some are taken forward over others. Limiting engagement due to resource constraints, while understandable, risks undermining trust in the designation process. These are statutory decisions with long-term consequences and must remain objective, consistent and defensible. A revised approach should be co-developed with local authorities, include clear prioritisation criteria, and maintain national coverage—not just respond to development hotspots.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- While we support the need to review outdated or poorly evidenced designations, we have concerns about the approach outlined. Dismissing lower-impact cases—such as address or category changes—as low priority risks perpetuating known inaccuracies. These updates, though minor individually, can significantly affect day-to-day planning decisions, enforcement, and public understanding. Leaving them unresolved undermines confidence in the designation system. The basis for prioritisation also lacks transparency. Phrasing such as “we think are no longer justified” suggests a closed, internal process. Local authorities are often best placed to flag problematic designations and should have a clearer role in shaping review priorities. Focusing on high-development pressure areas may be practical, but it must not come at the expense of assets in rural or under-resourced areas, where designations may be equally important but less visible. A clearer, collaborative framework is needed—one that allows planning authorities and communities to raise concerns and understand how and when these will be addressed. Without it, the system risks being seen as opaque and unresponsive.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- These initiatives are very welcome. The lack of clear, evidence-based data on the benefits (and challenges) of heritage protection has hampered policy development and investment cases for decades. In particular, it would be helpful to: Capture the role of heritage in community identity, place quality and regeneration. Show how protection can align with climate goals. Demonstrate net economic impacts — including tourism, building reuse, and investment.

17. Please share your views on the impact research themes we are considering - The proposed research themes are all appropriate and comprehensive: Economic: include impacts on reuse, town centre revitalisation, and affordable housing delivery. Wellbeing: crucial, especially in deprived or rural communities where heritage can be a major anchor of identity and resilience. Environmental: there is scope to go further in quantifying carbon savings from reuse, as well as the ecological value of heritage landscapes. We support the integration of data-gathering into other HES programmes, including grant monitoring and public feedback tools.

18: What impact do you think our strategy would have on people with the following characteristics? - Likely impacts: Positive for race, socio-economic background, and possibly disability, as the strategy opens space for broader community representation and more accessible information. Neutral for other characteristics at this stage.

19: What impact do you think the plan might have on people in island communities? - Not applicable for SBC. However, likely neutral impact. Clearer designation records, faster decisions, and better service will reduce developer risk and uncertainty. However, it's important the strategy doesn't inadvertently increase bureaucracy for already-stretched heritage professionals or smaller applicants.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - Likely positive impact. Clearer designation records, faster decisions, and better service will reduce developer risk and uncertainty. However, it's important the strategy doesn't inadvertently increase bureaucracy for already-stretched heritage professionals or smaller applicants.

21: Please provide any other comments on our strategy in the box below. - We welcome HES's transparency and commitment to meaningful reform. To succeed, it will need: Ongoing investment in local capacity, particularly in rural and under-resourced areas. Continued and active collaboration with local authorities, not only in policy but in operational delivery. A clear strategy for how to embed heritage in wider planning, climate and community policy frameworks. We thank HES for the opportunity to contribute and look forward to ongoing engagement.

Response ID: 24

Scottish Borders Council Archaeology Service

7: Do you support the vision, mission and overall approach? - Scottish Borders Council Archaeology Service is generally supportive but considers that the wording might better reflect the reality that much of the determining power, ownership and management of the historic environment, is predominantly with local authorities. As such, it is not just conversations that are needed, but real collaborations too. The Vision does not seem to recognise that Historic Environment Scotland is not always the determining body regarding changes for all designations. In fact, this is more often with the Local Authority. There is scope for refining the definition of the role of Historic Environment Scotland with regard to how it can support planning authorities and others. The absence of a countryside stewardship scheme for the bulk of monuments are not Scheduled Monuments and work outside of the planning process is noted, but this will stretch HES resources and staff, as well in the local authorities to support that work, all the more. The Approach needs to recognise the role and potential contributions of other individuals and organisations. As such, it may be more helpful to envisage 'joint

leadership' rather than assume HES dominance of even national level conversations. It is agreed that some forethought is needed, but this should recognise local circumstances too. Embedding HES Designations staff within local authorities or with more specific remits, may also be useful to set the priorities mentioned. Work to support the local authorities in this context – joint working - would also be useful too. Local acceleration projects for designation may be considered as useful examples of such work.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Reference to 'protection' may be clearer in concept for the general public, but it would have the knock-on that more would be needed to explain how that 'protection' operates in practice (for example who the determining body is, what are the implications are for management, both inside and out of the planning system or what activities may be permitted more generally in relation to protected sites). There is a risk that 'protection' may be understood to support an enhanced level of protection from - if not in fact an actual prohibition of - land use and/or development proposals in, at or around 'protected' sites; and particularly where such an understanding is considered helpful per se, to opposing or reducing development proposals. Further, the phrase 'protected historic places' would imply that some sites are 'unprotected historic places', which is potentially misleading about the potential management options for, and the perceived value of, cultural heritage resources generally. As such, any redefinition along these lines may in fact be directly harmful to certain assets themselves, where it indicates that they are neither protected nor valued by cultural heritage managers. It would be useful if the statutory status of monuments could be more clearly highlighted within the likes of NRHE Place entries for individual monuments, as there is no one-to-one concordance between designation entry or NRHE entry. There are instances where a number of monuments may be Scheduled Monuments or Listed Buildings, but where there are variously either only a single entry to represent them or many entries relating to single monuments. This is confusing.

9: Do you agree with our four priorities for the next three years? - Generally agree with these priorities. However, while these may be at the national level, there may be pressing local priorities too. The 'Understanding our impact' objective is perhaps too ambitious in terms of the time indicated, given the range and sheer quantity of designated heritage assets involved, so it may be more realistic to begin with trials of smaller subsets of designated heritage assets?

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Initiatives: There needs to be more work for engagement and evidence-gathering with local authority contacts. There is no mention of research frameworks that have been emerging in recent years for sites of particular significance, which might give pointers (these having already engaged with many of the bodies mentioned). For many sites, there is perhaps potential for greater engagement with local groups to research, and carry out fieldwork too, to aid the case for designation. (This would also support the knowledge of what designation does/doesn't do). The

former RCAHMS county inventory programme had a series of small excavations which not only helped identify monument typologies and better inform the development of sites but also acted as a spur to designation. There is perhaps an opportunity here for fieldwork-informed designation work to occur more routinely; in relation to which, encouragement and empowerment of local groups could usefully be engendered. The development of contacts for specific local liaison officers covering all HES remits, might also be useful in providing first-points-of-contact with HES, such as for designation, casework, heritage promotion, grants and so on. There has been little continuity of staff at times within HES, which makes it hard to establish good, reliable long-term working relationships.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - "HES' concern to 'lead' the strategic conversation around the whole system of heritage protection across Scotland, to ensure an integrated and comprehensive approach, is noted but should perhaps be challenged, at least in some cases and situations, as others will be as well placed, or better positioned, to direct these conversations. It is worth noting that not all local authorities employ specialists for all the types of designation, and that these services might be in shared services or other organisations covering that work for local authorities. Longer-term local work might be imperilled in the changing circumstances of those authorities, though one would imagine, and hope that there would be ongoing broad support for such work being carried out. Support is still required of such services for statutory services and to be able to offer time, experience and resources to support such work when other work may take precedence at their day-to-day reactive level. It is hard to reconcile reference to 'a whole-system approach' with the absence of any countryside stewardship scheme or support for asset owners. References to how undesignated sites might be managed in the planning system is concerning in that it indicates potential for 'mission creep'. However, a focus on training and the succession of staff within local authorities would be welcomed, given the limited money, support and training that is otherwise available to the usually very 'thin line' of officers at the local authority level, often constituted by busy single or very small teams of appropriately qualified staff.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- We generally agree with such proposed work, but in the changeover to Trove.Scot for the designations pages of HES, it is anticipated that more will be required of these webpages. Greater alignment of terminology between designations and NRHE will be required, as well as the abilities for searching the broad and general classes of monument, to avoid the specific narrow terms only being used in searches. The potential to use these Historic Environment Record entries in this work should be considered from the outset of revising designations. The proposed enhancement of MIDAS is welcomed, but should include the likes of evidence forms being recorded too (this is currently a MIDAS optional recording field, but one which filled in – to agreed terminology – might allow some better characterisation of the designated resource, as understanding how it survives, is often a starting-point for future actions). This should be fed back to NRHE and Historic Environment Records too. This

may be considerable work for the vast majority of designated heritage assets (742 Scheduled Monuments in the Scottish Borders), with the vast majority designated before the PAI Campaign* . There are a range of possible approaches but it is agreed there is a potential for new technologies in highlighting information. Scoring approaches may also be of use too, where many sites are of the same monument type generally. The definitions of areas of high development and land-use pressure should be discussed locally with the local authorities, and perhaps taken forward in alignment with authorities' Local Development Planning work?

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Generally supportive – but would need to encompass local priorities with respect to 'heritage risk' and whether these are manageable, whilst much work is evidently required to bring existing records up to scratch. This may be facilitated by embedding HES officers with specific local authorities to develop their understanding of a local area too, but this should be careful to complement, and not undermine, the role of the local authority specialists too. Nothing is proposed with respect to the use of research frameworks, which could facilitate the process – whether thematic, period and/or regional in nature. Further, specific projects may also be usefully commissioned within specific local authority areas, or even smaller areas, to develop local skills, knowledge and expertise, though this would be time away from the day-to-day for the local authority specialist too. The Monuments Protection Programme enhancement projects and county-based scheduling acceleration projects of the then English Heritage (now Historic England), may be useful for informing the proposed scoring exercise work, where sites are not unique. The processes should though, be discussed and developed with local partners, and the assessments also more widely shared – even if this does not result in any change of the designations for comments prior to the consultations too.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- This would all come down to the definitions of what under-represented types of sites and what high development/land-use pressure areas are. Suggestions have been noted on how this may be achieved above. Designation, high development and land-use pressures may not be exclusive categories.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Generally supportive in terms of recognising the issues, but this should not exclude the aim of enhancing the record too. It may be necessary to aim to better things locally, rather than work to national targets, whilst at the same time recognising that one-off cases of all sorts, may undermine any particularly rigid systematic approach.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Whilst generally supportive the communication of progress would also be welcomed to local partners, if this is not itself being carried out locally. There are potentials for overlaps with the geological and natural environment

conservation world, but work is required on designating, in isolation of sites or themes as a whole. Work could be complementary in nature, such as in work for Conservation Area Appraisals, working closer with designations of Listed Buildings for an area.

17. Please share your views on the impact research themes we are considering -

This is a range of baseline information that is being sought. There may be much that can already be gained from local authorities and others, as well as from such information being shared too. However it is unknown what real value economic figures might be. For many designated sites there will be no economic attractiveness (such as Scheduled Monuments) and very little tourist recognition of the sites as a whole – regardless of designation type or issues. It seems unlikely that all the designated heritage assets could be covered to the same degree of detail in these themes, but the role of HES for the properties in care guardianship monuments, might allow for trialling such approaches. Such overlaps of work, for example with environmental considerations, could contribute to a wider understanding of a varied range of assets (and aiding in the visitor offer too) – but this should also work in relation to existing Local Biodiversity Action Plans and management work for where the islands of designation are located. The recording of HES work itself, and its monitoring, should also be passed on to the local authorities in suitable formats (such as GIS shapefiles) since such information is both part of the national and local picture.

18: What impact do you think our strategy would have on people with the

following characteristics? - The work proposed has noted the needs for accessible information, but it is not explained how this will be made accessible, or what communications there would be for progress to the objectives. However we are generally supportive of all such methods for both the details of designated sites and the process of designation too.

19: What impact do you think the plan might have on people in island

communities? - Not applicable for Scottish Borders Council Archaeology Service.

20: What impact do you think the strategy might have on the competitiveness of

Scottish business, the third sector or on the regulatory context? - This work should have a positive impact as further clarity of designations and the processes of designation (especially communication on the process) are proposed.

Response ID: 25

Catharine Kidd, Montagu Evans

7: Do you support the vision, mission and overall approach? - Whilst there isn't much to disagree with the Vision, Mission and Approach pre se, it is quite ambiguous, and will be interpreted differently depending on the reader/ who is receiving it. The 3 statements need to be:- bolder and clear in the statements about the role of HES with regard to designations - be clear about what the designation strategy will cover, and

what it won't - linking in to the Designations guidance - - some clear signposting within the strategy would help, and, in doing this - be clear about the role/responsibilities of others/other stakeholder such as local authorities in relation to other non national heritage assets (those that might not fit within recognised national 'designations', or for example conservation areas , but may have importance to individuals, groups for different reasons/values important to them. Be signposted to clearer definitions/glossary to this: - heritage outcomes (what would these be/look like - this would mean different things to different people but what are they in relation to the national body/HES in their designations role? - national significance/ significance in relation to heritage assets - etc"

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - No, designation/heritage designation is well understood by those who use it, and across the UK. It establishes a clear hierarchy in heritage protection, that is understood and used to inform decision making. The continuation of the use of the term 'designation' will also help HES in clearly setting out what is within their remit with regards to heritage protections, and what lies with others.

9: Do you agree with our four priorities for the next three years? - Objective 1 - Could this include the role of HES in providing leadership/being at the forefront in establishing mechanisms/methods for alternatives to national designations for heritage protection for cases where designation may not be the best way of protecting a historic place/heritage asset. This may be for example historic assets/estates within areas of multiple deprivation e.g. Barlinnie Prison. Alternative's might be heritage management frameworks developed in consultation with key stakeholders for which case/pilot studies would be needed and roles/responsibilities for heritage protection understood..Objective 4 - Metrics for measuring impact and value would need to be clearly established. This should also be honest about the sometime negative impacts of heritage designation - i.e. abandonment and decay/lack of protection - this could link into the priorities of Objective 1 - greater emphasis on enforcement/training/upskilling/setting examples

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Copied from comment on Q 9: Objective 1 - Could this include the role of HES in providing leadership/being at the forefront in establishing mechanisms/methods for alternatives to national designations for heritage protection for cases where designation may not be the best way of protecting a historic place/heritage asset. This may be for example historic assets/estates within areas of multiple deprivation e.g. Barlinnie Prison. Alternatives might be heritage management frameworks developed in collaboration and consultation with key stakeholders for which case/pilot studies would be needed and roles/responsibilities for heritage protection understood.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - There is a training aspect to this certainly, particularly in relation to decision making in the planning system. There is a lack of heritage officers within local authorities that understand the different heritage

designations (why are they designated- what is their significance/special interest), and non-designated assets, and the weight that should be applied in determining applications with reference to legislation, and/or due to the absence of this in policy or guidance. Don't be afraid to learn from others in the UK - There are some clear examples, including case law, in England and Wales through the NPPF historic environment policies and planning practice guidance, including assessing levels of impact/harm and weight to be applied based on significance and whether an assets is designated or non-designated, which would help decision makers, and advisers. This could be developed in relation to a revised HEPS and related guidance.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- The records need to be more concise and be clear on what is designated and why. Recognise the records are only as good as the content/descriptions and assessments of special interest within them - important to get/use the right people for the job/task! Most records of Statement of Special Interest, except in some recent listing cases, are useless and bear no relation to the reason for its designation. The more recent listing records, have far too much content in the description - describing everything about the building, making it hard for people using them to clearly identify what is important/relevant and what isn't - only include what is relevant to the assessment/statement of special interest and how that has been established- don't include general history/architectural or building descriptions that are irrelevant. Don't be afraid to ask heritage professionals/qualified heritage advisers, or using information provided by them to improve or enhance records, or to review them. They are trained to assess buildings/heritage assets and significance. Look at other examples from across the UK - Historic England's Heritage List for example.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- I agree that this would help target resources. See comments to Q 12 about making more targeted/concise assessments, and use of external advisers or reporting that may be available from other heritage professionals to aid streamlining the process.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Yes, makes sense.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Yes, makes sense to prioritise these areas.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Given the limitations on resources, it would be important to be clear on the purpose of the proposed objective and initiatives, and, how a better understanding of impacts of heritage protection would be used to inform heritage protection in the future. It is all very well measuring impacts (good and bad), but there does need to be a clear understanding of why it is being done - what's the end game?

17. Please share your views on the impact research themes we are considering -

These all assume that heritage protection (through designation) leads to positive outcomes, which I support, but perhaps could be a bit more balanced to understand where protection might lead to poor outcomes/have negative impacts (usually due to neglect/lack of maintenance and investment/gradual decline/economic impacts due to business rates on unoccupied buildings - leading to a spiral of decline). The metrics need to be well defined and how they would be measured, to establish whether it is the heritage protection itself has lead to these impacts. For example how would heritage protection itself contribute to net zero goals? Would this not be achieved by interventions/changes/improvements made to rather than the designation?

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - It will depend on how it is developed and implemented. It has the potential to have a positive impact on the regulatory context.

Response ID: 26

The National Trust for Scotland

7: Do you support the vision, mission and overall approach? - We welcome the use of the word "protection", which is a commitment to conserving what is of historic and cultural interest, and which matches similar language in nature conservation.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - We are generally supportive, as above, protection is a clearer commitment. Designation, particularly within the planning system, may be perceived as a lower level of public interest - which is not the case (e.g. for designated historic battlefields).

9: Do you agree with our four priorities for the next three years? - We would ask why objectives 1 and 2 have longer timelines, out to 2028, rather than the shorter timelines for objectives 3 and 4.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - We would support the objective, but would ask that this review does not take place in isolation. In particular, local authorities have a key role in the management of the historic environment, including heritage protection. The review should include local authority capacity, expertise and roles.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- We would support the continuing development of data and records, and ways to access these. In terms of balance of effort, we recommend focusing on the quality of data, access, and searchability, over adopting cutting-edge technologies.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- We would have some concern over ""automating"" processes, with the risk that an automatic system either under or over-responds to cases - and which could be vulnerable to being manipulated. There is unlikely to be any replacement for human expertise, though this could be supported by new tools. This objective should also review where and how HES has been successful, and unsuccessful, in securing heritage protection. This review could also provide a baseline for future performance measurement.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- For historic battlefields, and for inventory gardens and designed landscapes, there could be benefit to reviewing these designations and identifying the key features that are most in need of protection.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- There would need to be a balance of effort, which would include weeding, but should also include updating records, and new designations.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Understanding public views is of great importance, especially where a baseline is created, and updated through regular surveys. Research should also engage with communities of interest, and expert groups, and their perceptions of how effective we are being at protecting heritage, and ensuring it continues to be used and enjoyed.

17. Please share your views on the impact research themes we are considering - Landscape is an important element of the historic environment, and covers all three of the proposed themes. Culture could be a fourth theme, and would match the four pillars of sustainable development.

21: Please provide any other comments on our strategy in the box below. - We welcome the proposed review. For maximum benefit, the wider professional community (public, private and third sector) should be included in the discussion, along with communities of place and interest.

Response ID: 27

East Lothian Council Archaeology Service

7: Do you support the vision, mission and overall approach? - East Lothian Council Archaeology Service (ELCAS) welcomes the commitment from Historic Environment Scotland to seek to lead the sector in relation to national level designations. However it is important to note, and should be acknowledged, that much of the actual management

and protection of most designated sites lies largely with the local authorities through planning and other regulatory systems.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - The term 'designated' while it may be misunderstood by the public is widely used in strategies, policies and regulations which lie far outside the Historic Environment arena. Changing the term to 'protected' will introduce more confusion into the system. We would also point out that the term 'protecting' is also problematic as there is an implication that this will stop any changes happening to a monument or its environs. In terms of Designations this is not true – the management of Designations is largely reactive when change occurs. Largely as a sector we manage change in the Historic Environment as even Scheduled Monuments are not 'preserved in aspic' but have to be conserved, managed and interpreted and how this is done changes through time. This flexibility is essential as it allows things like climate adaptation etc to be taken into account to sustainably manage a monument whether designated or not. It is acknowledged that local communities can often interpret a 'designated site' as being a 'protected site' which has value to them in relation to safeguarding their local archaeology. But changing 'designated' to 'protected' would be misleading, as not all designated sites are 'protected' legally to the same degree. Replacing the term 'designated' with 'protected' would imply that all the undesignated historic assets (which make up 90% of the historic environment) are 'unprotected'. This would be misleading as these undesignated historic assets are given a level of protection through local authority archaeology services and the planning system. We would argue for the continued use of the term designated as while we acknowledge that it may be problematic to some, it is understood as a technical term and has the advantage of longevity and widespread use.

9: Do you agree with our four priorities for the next three years? - East Lothian Council Archaeology Service generally agrees with the four identified priorities and looks forward to seeing how these will be delivered. East Lothian Council Archaeology Service welcomes the approach proposed in terms of engagement but we would request that contacts for large organisations (Local Authorities etc) are kept up to date as at times consultations or requests are sent to incorrect individuals or departments which leads to delays in responding.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - East Lothian Council Archaeology Service welcomes the intention to have a national conversation regarding a 'whole system' approach to heritage. However, how this is formed will be key as the actual management of the vast majority of the Historic Environment (both designated and undesignated) is undertaken by Local Authorities via the planning system and other regulatory systems. This should be explicit in any conversation with the focus not solely on designations. We would also note that there are multiple regulatory systems in play for managing the Historic Environment – Planning, SMC, LDP etc and any 'whole system' approach should not weaken the provision of Historic Environment management in any of them, indeed if this is to be

viable the opposite must be true. Key to ensuring that this management is as consistent and sustainable as possible there needs to be a strategic recognition of the role and importance of Historic Environment Records (HERs), which are largely maintained and managed by Local Authorities, and we would advise that there needs to be a drive to make HERs and the appropriate curation of them statutory as a priority

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?-The aim to improve the accuracy and information in designation records is welcome. However, the acknowledgement of HERs as key to this needs to be explicit and early engagement with ALGAO is advised.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- We welcome the revised approach and would welcome the opportunity to work with HES to progress these initiatives

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Key to achieving this will be continued support of Regional Research Frameworks. There will also need to be a concerted effort to avoid 'area bias' both geographically and chronologically and we would advise that the Local Authority archaeological advisors could help with this as they are best placed to advise on the nature and significance of sites within their area and regionally.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- East Lothian Council Archaeology Service welcomes the review of designations that are no longer justified, and agrees that many designations need improved records, particularly where there are development pressures. We would also advise that for perceived minor issues there needs to be some form of fast track system which can be accessed (e.g. a wrong address on a listed building can and has caused significant issues both for owners and regulatory authorities)

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- The collection and understanding of empirical evidence of impact of Heritage management is welcome. We would also welcome a greater integration with natural environment evidence to give more rounded evidence of the impact to management of our whole environment. For all intents and purposes the natural and historic environments are indivisible but we as a sector often wall off the historic environment when looking to measure impact of managing it.

17. Please share your views on the impact research themes we are considering - While the collation of baseline evidence for these topics will be important in helping demonstrate the value of heritage protection there is a concern that the management of designated assets will be used as the sole performance indicators for the sector. The complexity of some of these topics means that there is limited scope for measuring tangible impacts arising from the Historic Environment (e.g. property values). The majority of the management of the historic environment is on non-designated assets and

these are often the ones which are interacted with by the population on a day-to-day basis (e.g. ensuring that undesignated historic landscapes, townscapes, buildings, sites and monuments are managed appropriately and sustainably) and are often 'hidden' i.e. part of wider management . Changes to these will often have a greater impact on the character, attractiveness (both aesthetically and for living/ working in) of an area than management of designated sites. Any collected evidence for the management of designated sites should go hand-in-hand with data for the whole historic environment to give proper context. What is missing from the impact assessment criteria is the impact on the heritage itself. Ultimately, the main reason for designating a site, is not related to any of the above criteria, but to recognise the value of those heritage assets in and of themselves, and to give them a higher level of consideration, and in some cases legal protection, in planning and other regulatory systems.

Response ID: 28

Andrew Puls on behalf the Highland Council

7: Do you support the vision, mission and overall approach? - Yes, we generally support the vision, mission and approach. However, we would hope that the vision – to ensure our protected historic places more fully reflect Scotland's rich and diverse heritage delivering better outcomes and benefits – could be achieved sooner than 2035 and we would advocate for a more ambitious target. We agree that HES should lead on the identification, protection and information provision of our most significant historic places and we welcome the reference to supporting planning authorities in making informed decisions. We welcome and support a long-term conversation regarding heritage in Scotland and welcome the opportunity to participate in that conversation. We note that HES propose to lead these discussions, and we agree that in many cases this will be entirely appropriate. It is, however, important to note that there are areas of heritage protection where HES, although key partners, do not act as the lead body, i.e. the work of local authorities in protecting undesignated heritage, the designation and protection of locally important historic places and the management of both statutory and non-statutory heritage designations; trunk roads; marine heritage; museums; archive services etc. HES will be invaluable in facilitating discussion around all of these areas, developing workable, practical and joined-up solutions to the many issues heritage currently faces. It is also important that HES recognise that in certain areas of heritage protection, expertise resides with others and it is important that those organisations are able to lead the conversation and are integral to identifying opportunities to affect real, positive and lasting change as part of a whole-system approach.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - We do not agree. Our experience of the terms "Designate" and "Designation" is that they are relatively well understood, and even if the legal mechanisms that underpin a designated site are not fully appreciated, the substantial majority of customers and stakeholders do understand that a 'designated'

site is afforded special protection and that prior to carrying out any works, there is a requirement to follow additional processes. Additionally, there is less ambiguity in the term 'designated', which in our view clearly indicates the importance of the asset and its legal standing. A 'protected' asset by contrast, could confer a range of meanings and promote misunderstanding as to its status in law. It is also the case that designated sites are rarely referred to as such, and in practice are referenced by their designation type, i.e. Listed Building or Scheduled Monument; it is often these terms that generate more uncertainty and misunderstanding in terms of what is and is not permitted, and the decision making process that governs them, especially for members of the public that have little experience interacting with the historic environment. Additionally, we are concerned that if the term 'designated' is replaced with 'protected', it follows that the term "un (or non-) designated assets" (which currently refers to c.95% of Scotland's historic environment and are described as such in NPF4 Policy 7) will become 'unprotected assets', the inference of which suggests a lesser degree of importance, recognition and protection – and once an undesignated asset enters the planning system it is then effectively protected. It is important that, should the terminology change for designated sites, that undesignated sites remain as such. Under the current legislative and policy framework, it is already challenging to ensure undesignated heritage is appropriately considered in both development and proposals for land use change. The potential for unintended consequences of terminology change (by labelling these sites are unprotected and therefore potentially of little or no value, and therefore disposable rather than irreplaceable) to result in real-world adverse impacts on the ability of local authorities to protect and preserve historic assets is significant. The term 'designation' is used extensively and consistently throughout heritage legislation, policy and guidance and by introducing new terminology alongside existing (effectively giving two terms for the same thing) has the potential to cause even more confusion – it will take decades to fully incorporate new terminology within all relevant legislation, national policy, local policy (across all local authorities) and national and local guidance. If the terminology is poorly understood by the public, rather than across the sector, it is perhaps more appropriate for HES to undertake more engagement and education around the terminology, so it is better understood by the public, rather than changing established and entrenched terminology which is likely to have a big impact for those working in Heritage Management.

9: Do you agree with our four priorities for the next three years? - We support and agree with the four priorities.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - We welcome the initiatives and we look forward to contributing to the policy reviews. Strategic engagement with partners, especially local authorities, is welcomed. Local authorities are uniquely placed to contribute to the discussion regarding emerging areas for heritage protection and have a detailed understanding of where the gaps are at a local and regional level; we believe there is much to be gained from closer collaboration with HES on this issue.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system?

- We agree that the long-term future of heritage protection should adopt a 'whole system' approach whilst recognising regional/local differences, characteristics and limitations. HES will be aware that local authorities have an in-depth understanding and a wealth of experience in leading the management of regionally and locally important places, including undesignated assets. This includes the importance of maintaining local Historic Environment Records that underpin this work. Local authorities are acutely aware of both the challenges and issues of heritage management in this area, the scale of the work and the limitations of what can be achieved within the current legislative and policy setting, and how and where systems can be improved to streamline the approach to heritage protection. We welcome a strategic conversation with HES, recognising that each local authority has its own set of challenges and opportunities. It is important that engagement takes place with the right people. Specific expertise resides predominantly within each local authority's historic environment service and it is engagement with these specialist services, both individually and via ALGAO / COG, that will be instrumental in moving forward positively to deliver an integrated and comprehensive whole-system approach. We welcome positive engagement, especially around how and where Scottish Government and HES can better support local authorities, better integrate the many positive outcomes being delivered at a local/regional level with national aims, ambitions and targets and work more collaboratively with local authorities to protect heritage. If a whole-system approach is to be adopted undesignated assets and locally/regional important sites and places (and how these are managed through the planning system) will need to be better integrated with designated sites and places. This will not only ensure we have a better understanding of the state of heritage in Scotland, but also the priorities for its protection moving forward. It is anticipated that this conversation will be wide-ranging and will, for example, need to consider the importance of ensuring national guidance is up-to-date, the impact of recent amendments to the General Permitted Development Order, how Inventory Battlefields and Inventory Gardens and Designed Landscapes could be more effectively managed and protected as part of a whole-system approach and how the role of HERs in the planning process can be better recognised at national level with a view to making them statutory, in line with the rest of the UK.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?

- We support the proposed initiatives and would note the importance of all heritage databases using industry accepted data standards. Most HERs in Scotland comply with MIDAS data standards and it is welcome that HES are looking to adopt the same standards to improve the quality and interoperability of national data.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?

- We support these initiatives and note the importance of streamlining processes – we welcome the opportunity to feed into the review. As part of the review, consideration should be given to prioritising requests for new / amended listings and schedulings from local authorities, especially where these are connected

with a potential threat to the integrity of the asset. We would also suggest HES review their stance on designating assets where there is an active planning proposal – very often important asserts only come to light through the planning process, and by limiting opportunities to protect such sites we risk losing significant elements of Scotland's national heritage. We would note that significant care will need to be given as to how and where automation and AI is utilised in heritage management, and may be more appropriately focused on process, rather than decision making, which – as HES will be aware – is often nuanced and finely balanced.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- We agree that prioritisation is important, given limited resources. We also agree that priority should be given to new designation requests where such are located in areas subject to development/land use pressures; it may be that this criterion is more important than whether a site is under-represented. We would be interested to learn how HES intend to define an 'under-represented site', and the process for agreeing what site types are under-represented – use of national and local Archaeological Research Frameworks should be used to help inform this process. This may vary from area to area and discussion with local authorities will be important in helping identify sites and site types that are poorly represented in the local record. As above, we would suggest consideration is given to prioritising designation requests from local authorities that have a detailed understanding of the local historic environment and associated pressures and can help prioritise sites of most importance or those under most significant threat. We would also suggest prioritising designations in line with conservation area reviews / designations to ensure a joined-up approach to heritage protection in locally designated places.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- We generally agree with this approach and welcome the intention to prioritise designations that have inadequate records – this can be a significant barrier to the effective protection of an asset. As is presently the case, it is important that proper consultation is undertaken where HES believe a designation is no longer justified and to take account of local views and information. In respect of listed buildings, the address – as the only statutory part of the listing – should remain a priority and should be changed as and when required. We would suggest that, to ensure factual accuracy and to keep the listing address aligned with the actual address of the building, that a simplified process of notification, rather than consultation, may be appropriately implemented.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- The initiatives outlined are generally supported. We would advocate the inclusion of research on how successful Inventory Battlefield and Gardens and Designated Landscape designations are working, and how protections can be improved. It is important that, should negative impacts be identified, that these are not used to weaken protections or deter preservation. It is important to ensure that a proportional approach is taken that recognises the relatively small number of designated

buildings in relation to undesignated housing stock, and that a special case needs to be made to ensure the special architectural and historic interest of these building is not lost at the expense of other competing or incompatible initiatives, no matter how important these may be in their own right.

17. Please share your views on the impact research themes we are considering -

We support the three research themes which should highlight the invaluable social, environmental and economic contribution the historic environment makes to Scotland; this research should help demonstrate to all stakeholders the importance of heritage and heritage protection. Conversely, in areas where it may be more difficult to demonstrate positive impacts of heritage, i.e. with regard to listed buildings, higher maintenance and development costs, difficulty or inability to meet modern energy efficiency standards, difficulty in conforming to modern building standards etc, it will be important that these factors are not used to weaken heritage protection. Rather it is an opportunity to highlight the value and importance of preserving heritage in its own right and on its own terms, acknowledging that compromise and flexibility is required in how and when we apply modern standards and requirements when preserving Scotland's heritage. Likewise, we would like to see baseline evidence collected on access to and the sustainable supply of traditional craft skills and the potential economic (and environmental) impact of difficulty in accessing appropriately qualified and skilled contractors. It is, however, unclear what the outcome of this research will be and what it will go towards, i.e. will it be used to inform policy?

Response ID: 29

Simon Gilmour on behalf of The Society of Antiquaries of Scotland

7: Do you support the vision, mission and overall approach? - The aspirations are welcome. The mission needs to refer directly to local authorities as well as, or instead of, one of the communities, partners and others. They are a critical component of any designation regime and need to be highlighted and recognised as early as possible in any strategy. While recognising the need for longer term thinking and discussions, the approach should also recognise the need for immediate short-term action to reflect changes in society and environment happening now. The approach is unclear whether the conversation will be long-term or whether a more urgent conversation will focus on the long-term. The following objectives need to articulate how designation will benefit communities.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Fully supportive of the use of 'protect' - this gets to the heart of what this process is meant to do, removes ambiguity and needs to be considered in all aspects of the regime. For example, the Mission statement could refer instead to "...historic environment is well-protected for current and future generations." While management of the historic environment is important, so is

protection and the mindset may have shifted too far towards management at the expense of protection. This would also then emphasise that Gardens and Designed Landscapes and Battlefields are protected.

9: Do you agree with our four priorities for the next three years? - The first objective is a bit woolly - what priorities are being considered? It would be useful to be clear in this objective that all options are to be considered, from what is protected (now and in future) to how the process will change. It should be noted from the outset that while the initial research suggests "No enthusiasm for significant legislative change"; the envisaged wider and more in-depth conversation might determine that the only way to deliver the required improvements is through legislative change, so this should not be discounted at the outset. Improving our service could usefully specify better collaborative working as well as own timely decisions. Overall, seems very internally focused, and could be more outward looking to provide leadership and ensure collaboration.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Taking three years to deliver a 10 year strategy for designations seems excessive. It also appears contradictory to Objective 3 - improving our service, especially the delivery of timely decisions! The national heritage strategy for the whole sector didn't take as long to develop. While it is understood that other objectives appear to be undertaken in advance of March 2028, given the feedback already provided, data already available and the scale of the organisation this should be completed much sooner. The feeling from this and succeeding objectives is that a more strategic pro-active approach will only start from March 2028.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - While welcome a three year timetable will lose focus and engagement. This should also include reviewing ecclesiastical and class consents and HMPAs.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- This is entirely focused on HES records with no connection made to related data used elsewhere, and makes no mention of improving the information provided on the process rather than the data itself. Standardisation and meeting FAIR principles is very welcome.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- A dynamic risk-based approach should reference the need to understand the wider policy and operations landscape, including the impacts of national developments such as the agriculture bill (the Society is aware that SGRPID does not consider non-designated assets to be worth protecting, so without a pro-active approach from HES to ensure nationally significant assets are either designated or a process which conforms to NPF4 principles is adopted, we will lose buildings, sites and monuments with heritage value), the impact of afforestation, the impact of city deals etc. Of the various objectives proposed, this one should probably reference the benefits to

communities that HES envisages designation providing. This will require an enhanced service to specific communities which is not articulated here.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- While this seems logical, it is unclear what under-represented means (under represented versus what?). Certain sites should arguably not be scheduled (crop-mark sites are an example that needs greater consideration) and so comparison for them with regards representation would be a false equivalence, and it should be remembered that the history of designations means it is not feasible to try and match new designation numbers to those created over decades. In addition - to provide community benefits will require focused activity which, in many cases, will not align with either under-represented sites (although that is more likely), or development/landuse pressure. An alternative would be to create a framework which provides peer reviewed and public supported priorities for designation. This would provide a pro-active rather than reactive focus for the team.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- How does 'minor corrections and address changes' relate to the previous objective to improve the data? This seems on the face of it to be contradictory. Reviewing the use of class consents should be considered under this objective - and links to the review of existing designations that have no clear evidence to support them (like cropmark sites). Again a framework could provide a useful more pro-active structure.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- What sort of impacts are envisaged, would the research be targeted (e.g. to elicit well-being data or an understanding of support for heritage assets in a community for example)? If so, perhaps this should be clarified here, even if as an example of the type of data.

17. Please share your views on the impact research themes we are considering - These should be articulated in the objective itself. The Society is particularly interested in the potential for wellbeing/social/community impacts of designation and would be pleased to help where we can.

18: What impact do you think our strategy would have on people with the following characteristics? - Without the strategy specifying action in terms of these characteristics it is unclear how it could affect positively or negatively.

19: What impact do you think the plan might have on people in island communities? - Without the strategy specifying action in terms of this characteristic it is unclear how it could affect positively or negatively; islands have hotspots of development/landuse pressure like elsewhere, so even if the priorities were aimed at such locations it is unclear how this would impact island communities relative to others.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - What does HES view the competitiveness of the third sector to be/mean? The strategy should have a positive impact in the regulatory context given that is where designations sit in the policy landscape but that impact might be different for business or the charity sectors, so difficult to answer with one question.

21: Please provide any other comments on our strategy in the box below. - Some timescales seem overlong for an organisation the size of HES, and all areas of HES should be able to support this strategy and thus shorten those timescales. The strategy should also have objectives to clarify the role of HES as a lead in the sector, as noted in the vision and mission. Specifically, but not only, early and consistent mention of local authorities as key critical parts of the system needs to be emphasised. A clear link between the objectives and the vision and mission should be visible. During the consultation discussions there was mention of ICH and how designations might support this important aspect of Scotland's heritage. Even if only the ICH linked to tangible heritage assets which designation is currently legally set up to work with, this would seem like a way to involve a much greater range of people in the process. Having equitable relevance in significance criteria is only a first step. The vision and mission are geared towards a more pro-active service, and the rest of the objectives should be similarly aligned (much of the work in the objectives is still reactive). The need for a strategy is clear and the opportunities it provides are welcome.

Response ID: 30

Hazel Gulliver, Scottish Power

7: Do you support the vision, mission and overall approach? - Yes we support the vision, mission and approach that Historic Environment Scotland (HES) has identified in this consultation document. Mission: We feel it is important that the mission focuses on the most significant historic places. Given constraints on resources and the importance of historical preservation, it is appropriate for HES to be targeted in its mission. In the context of the mission statement, we believe that HES's role in providing accurate and accessible information about historic places is important to support the wider planning system in Scotland beyond just planning authorities. For example, HES supports the Scottish Government's Energy Consents Unit which leads the consenting process for large energy generation and transmission infrastructure. As such, we would suggest that the mission phrasing is broadened to better capture this role. We also believe that the phrase "well managed" could be changed to "appropriately managed" to reduce a degree of subjectivity within the mission statement. Approach: We agree with the approach, in particular that heritage protection needs to be responsive to our changing society and environment. However, we suggest that "and climate" is added after "environment" given the importance of mitigating and adapting to climate change for HES assets and designated sites. As a developer, we regularly use information held by

HES to design projects. We therefore welcome the stated aim for HES to provide an accessible service.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Whilst, we agree that “protected” is a more widely understood term than “designation”, we feel that the two terms convey a subtle but important difference which is important to consider. In our view, “designation” is a known recognition of importance or significance, whereas “protected” suggests there is some level of management in place for a given site. Whilst the designation itself provides a framework for decision-making for sites, it does not protect sites from damage due to long-term vacancy or disrepair, and we feel use of the term “protection” may convey added expectations of maintenance and management from the public which would not be automatic with a designation. We would therefore prefer retention of “Designation” Designations and Designate in order to avoid any reduction in terms of the recognition of importance of significance of a site/place.

9: Do you agree with our four priorities for the next three years? - We agree with the identified four priorities for HES and have set out some specific recommendations for several of the objectives below. We believe that clear and measurable objectives can guide HES work with relevant stakeholders to meaningfully contribute to historic and environmental protection of sites. With regard to Objective 1 - looking ahead, we would welcome engagement with HES as it develops its long-term strategy. We believe there are a number of areas where early and constructive engagement with ScottishPower can be effective in delivery of the strategy. We welcome Objective 2 - improving our information, and we believe this is a vital objective for HES. In our view, it is essential that all designations have adequate and accessible information in relation to them available, detailing the importance and setting of the designation. We believe it is critically important that landowners, developers and decision makers have a shared understanding of the criteria which developments must meet to ensure that potential impacts to individual designations are avoided, minimised and mitigated against. With regard to Objective 4 – improving our service, we would welcome the strategy including mention of socio-economic and climate impacts as considerations within HES decision-making processes.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Given the impacts of designations on the wider community and area, we feel that engagement is crucial for understanding how protections can be best managed alongside development. Broad engagement is also vitally important as HES considers both whether to designate new sites and delist sites which may not meet current thresholds of importance. We believe that understanding the impacts of designation upon people, businesses and the wider environment should be the starting point for HES decision making, and we support this section’s commitments to strategic engagement. We would note that no renewable energy developers or energy trade organisations (such as Scottish Renewables) were consulted throughout the designations stakeholder engagement process that MainStreet Consulting undertook for

HES. Given the significance of renewable energy in meeting Scotland's net zero target and the scale of development currently installed and in development, we believe it is crucial that renewable developers are included in the strategic engagement process. We would strongly encourage HES to include both network (transmission and distribution) operators and renewable energy companies in future engagement processes before the 10-year priorities are finalised and published. As we noted in our response to question 9, we believe there are a number of areas where early and constructive engagement with ScottishPower can be effective in delivery of the strategy, and we would welcome discussion on how and with whom to engage across our businesses.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - We would support a strategic conversation on a whole-system approach to heritage protection. We would suggest that climate change mitigation and adaptation be incorporated as key topics to explore with a broad stakeholder base. The Scottish Government's declaration of a climate emergency highlights the urgent need for a shift change in how energy is consumed – this includes increased renewable electricity and decarbonised heating. We believe that heritage protection can go hand in hand with both renewable energy and building decarbonisation infrastructure and would therefore welcome engagement to discuss areas of shared interest and how industry can best work with HES.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- We welcome the proposed initiatives to improve information and believe it is essential that missing and/or inaccurate data is widely understood by both decision makers and users of HES records. As a developer, it is access to accurate and complete site-specific information, including its setting, that is critical to design projects. Where this information is missing or inaccurate, there is the potential for projects to progress through the engineering and design phases into the planning process before developers are made aware of potential heritage impacts which, had they been identified sooner, could have been built-into the project design. We would agree that HES should prioritise the review of designations where there is inadequate information on record. We would support a review process, that also included an assessment of whether or not the site actually does meet the threshold for current designations. We would suggest that the review process should aim to proactively support a better understanding of designations and be responsive to our changing society, environment and climate.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- We agree with the initiatives listed for Objective 3, and we would welcome early and constructive engagement with HES for renewable and network developments. Timely and accurate engagement is important as later in the project life cycle it is significantly more difficult and more expensive to change plans. Additionally, developers often manage various potential impacts across a range of stakeholders and statutory consultees, which underscores the importance of early engagement. With regard to the formalisation of external requests according to the

scale of impact, we would welcome discussion on whether some types of low carbon technologies (heat pumps, solar panels and EV charging) could either be exempt from consideration or have streamlined processes to facilitate installation within acceptable parameters. For example, there are some heat pumps that can be painted to blend in with their surroundings, and these types of installations may be deemed acceptable within certain designations where there is no existing permitted development right.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- We support the protection of heritage and the environment and HES's role in designating sites. With over 56,000 designations listed in the HES historic environment portal, it is reasonable to assume that a significant percentage of the sites in Scotland requiring a designation are already on this list. In this context, we would suggest that HES makes decisions on new designations irrespective of areas with high development, and instead focuses on sites that truly meet modern thresholds for designation and protection. However, we understand that as communities, environment and the climate change, there may be a need to designate new sites, where appropriate.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- We agree with this approach to prioritise the review of existing designations over correcting minor errors in the records. We agree with the Mission statement that HES should focus on protecting Scotland's most significant historic places. We also understand that designations have consequences for communities and homeowners. One such consequence is the inability to install energy efficiency and low carbon technology swiftly and inexpensively. Additionally, other designations can impact the development of renewable energy and energy network infrastructure which is needed to meet the Scottish climate change target. We therefore welcome the prioritisation of reviewing designations that are deemed to be no longer justified, and we believe it will be important to communicate these changes to planning decision-makers so that current projects are not impeded or unduly impacted by out of date designations.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- We agree with the initiatives listed for Objective 4.

17. Please share your views on the impact research themes we are considering - We welcome the themes listed, and believe that in the context of "environmental" impacts, HES should include the Scottish Government's climate and renewable energy targets in addition to any emerging heat decarbonisation targets included within the proposed Heat in Buildings Bill, expected later this year.

18: What impact do you think our strategy would have on people with the following characteristics? - Others are better placed to comment.

Response ID: 31

Iceni Projects

7: Do you support the vision, mission and overall approach? - Should there be a reference somewhere in these that cultural heritage doesn't only reside in the physical aspects of a place, but also in its associations/intangible value. In the 'Approach' section, it says that HES will 'adopt innovative approaches'. Do these approaches need to be innovative, or should they simply be effective and impactful? Innovation is good, but not always necessary.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - The phrases are a little long-winded, and there is a chance that renaming leads to more confusion; however, the phrases do communicate the purpose of designation more effectively. Will 'non-designated heritage assets' (NDHAs) be renamed? If the phrase 'designated' is poorly understood, then the phrase 'non-designated' would prompt even more confusion. If 'designated heritage assets' are being renamed, then a review of how NDHAs are referred to could also be considered. There is an opportunity to distinguish between buried NDHAs, buildings which are NDHAs, and locally listed NDHAs.

9: Do you agree with our four priorities for the next three years? - The ambitious and clear deadlines are a useful marker of progress, particularly regarding the anticipated outcomes of the 2nd and 3rd objectives. How will these ambitions be resourced? Internally using existing skills or drawings from external specialisms? More clarity could be added to Objective 4. Is the 'current system' the one under development or the one we have now. What type of impacts are being referred to? Would 'benefits and impacts' or 'benefits and consequences' be more communicative? What is the purpose and reasoning behind this objective?

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - The aims and principles are good and well-intentioned. However, the language used in the initiatives is quite jargon-heavy and generalised. Can you be more specific about the types of opportunities and engagement? How will the information gained through various engagement exercises be used to influence the priorities, and what weight will it carry?

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - A 'whole-system' approach would be beneficial. It will be challenging to discuss and deliver due to the different levels of heritage specialisms across Scottish local authorities. HES is naturally well placed to lead these discussions. However, there is naturally a question about resourcing this. Greater consistency and clarity across authorities and regions would be beneficial. This is especially true in the case of NDHAs where there is a distinct lack of clarity in regard to understanding and approaching NDHAs through the planning and heritage protection

systems. What else would be included in a system wide approach outwith designated and non-designated heritage assets?

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- As only 7% of records meet the required standard, would it be more accurate to say that 'most' (rather than 'many') don't meet the current standard? Engaging with users to report known issues is a positive idea. Opportunities to report discrepancies (perhaps through a short webform) could be incorporated into each online designation record. The SEO of designation records (e.g. online listed building entries) is poor; often, when googling 'building name, listed building', the relevant result will not appear. Improving this through some minor backend tweaks would enhance the accessibility of designation records. The entries on the Buildings at Risk Register for Scotland had a development history which included recent reporting on each site, often submitted by members of the public. These were useful for getting a sense of the recent history and present condition of buildings. Could something like this be incorporated into designation records? Perhaps an additional heading for locals reporting on a listed building. It would be a way of informing people of recent changes to a site without a full re-appraisal of the designation record. Upgrading recording in high development/land use pressure is a sensible prioritisation. Could decisions not to designate buildings be made publicly accessible? For example, incorporated as a layer on PastMap? Heritage Statements (and other similar documents) prepared for planning applications often involve a large amount of historical and sometimes archival research. Is there a way to utilise this existing work? Could they inform designation entry updates, or become part of local HER data? Regarding 'Improved understanding of how technology can help us update our records'. Consider consulting, even informally, with private companies, local councils and other organisations to learn how they are/aren't utilising AI technologies. Share knowledge to learn how AI support heritage-related work and where it is less effective. Also – should this success measure have more measurable progress, e.g. 'using' new technology to update our records, rather than just 'understanding'. Who will use new technology – will this involve upskilling existing staff or hiring outside people?

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Agree with these initiatives and prioritisation strategies. Developing a prioritisation matrix will enable HES' work in this area to be impactful. Transparency will be required for the prioritisation strategy, e.g. external requests will need to be made aware that there is a prioritisation hierarchy (of course, requests may then be overly biased or prone to hyperbole). Is there a way to communicate which buildings have previously been considered/are being considered as a way to reduce duplicate requests?

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- This is a sensible and pragmatic approach. Particularly if development is imminent. Would the number of people submitting external requests have a bearing on how a site is prioritised? E.g. If more people submit external

requests for a site, would a site be prioritised more? When people submit external requests, should a higher burden of proof be a requirement? E.g. a larger amount of supporting material. This would allow HES to have a stronger understanding of the site when considering how to prioritise it. A lot of submissions to various HES departments are done via email. If this is cumbersome and/or inefficient, web forms or online submissions may create more efficiency.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- This is a reasonable and pragmatic approach. With instances of minor adjustments, such as address and category changes, is there a middle ground? Could designation records be flagged to say that revision of the address/category may require updating? Would an additional subsection on designation records for recent reporting from members of the public provide people with a better understanding of the recent history and present condition of a site? For example, the entries on the Buildings at Risk Register for Scotland had a development history which included recent reporting on each site, often submitted by members of the public.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- These are interesting questions. What is the longer-term plan was this information to be gathered and reported on? Will this information directly influence HES's next steps with regard to its designation strategy?

17. Please share your views on the impact research themes we are considering - Economic impacts should consider 'Conservation Deficit'. More indirect economic impacts should be considered, for example, heritage is a strong draw for tourists, who may also visit local cafes and support the local economy. HES's report on VAT for listed property in Scotland found that it was unclear whether a VAT rebate scheme for works to listed buildings would be an optimum way forward. However, finding a way to financially incentivise the re-use of designated places would likely be impactful, especially for larger developers. As a company, we work with many developers, and the VAT question is often decisive when it comes to questions of why retrofit and reuse aren't viable (this is the case with both historic and non-historic buildings). Wellbeing/social/community value – people often care deeply about local historic structures, particularly if threatened by development. This theme should recognise the social value of places and how community buy-in can lead to change. Environment – conservation and sustainability go hand in hand, especially from an embedded carbon perspective. Retrofitting and/or reuse are therefore important from an environmental and heritage perspective.

18: What impact do you think our strategy would have on people with the following characteristics? - Not sure. However, the proposed approach to prioritise new designation requests for underrepresented sites may lead to the protection of places associated with the above characteristics, which would likely have a generally positive social heritage impact.

19: What impact do you think the plan might have on people in island communities? - Designating sites on islands may have a positive impact on the social heritage value of places and endear a sense of pride in a place. It may also lead to increased tourism, which can have positive economic impacts. However, the increased requirements on the care and maintenance of a site and reduction of permitted developments rights as a result of designation may lead to economic and logistical challenges for island communities.

18: What impact do you think our strategy would have on people with the following characteristics? - Greater clarity around designated sites, swifter action and more impactful decisions will likely have a generally positive impact.

21: Please provide any other comments on our strategy in the box below. - It is a positive step to be evaluating the effectiveness of the current system and to be open to changes in order to make it more impactful.

Response ID: 32

Shetland Islands Council

7: Do you support the vision, mission and overall approach? - Whilst the overall approach raises no concerns the use of the phrase 'most significant historic places' does not align with the more holistic approach to the historic environment taken by the sector as a whole in recent years.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Whilst it is appreciated that the use of different terminology in public communications can be helpful nevertheless the use of 'designation' has a long history in legal and planning contexts and remains important. Rather than changing terminology wholesale consideration could be given to improving communication and public understanding.

9: Do you agree with our four priorities for the next three years? - The objectives are clear and comprehensive however without addressing the lack of resources across the sector as a whole and particularly within local authorities there is a significant risk that these objectives cannot be achieved.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Agree with the proposed initiative but feel it would be helpful to acknowledge that there will be difficult decisions to be made and there needs to be a realistic understanding of the resources available to implement proposals.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - As above it should be acknowledged that there will be difficult decisions to be made and there needs to be a realistic understanding of

the resources available to implement proposals. Part of the conversation should include how to address this going forwards including raising awareness of the importance and value of the historic environment.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- Fully support the proposed initiatives and suggest more standardisation and support for locally held records.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- We are concerned that this initiative seems to focus on internal processes and risks minimising the crucial role input from HES plays in protecting the historic environment within the planning system. This is particularly relevant given the widespread lack of specialist conservation expertise at local authority level.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- This approach would not address the significant issue of long term deterioration of historic sites and buildings which does not present as an immediate 'risk' but arguably has a more significant impact than many more 'high profile' cases. An approach which recognises both issues as priorities would be preferable.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Provided that priorities for review are developed in conjunction with those responsible for decision-making and management of the historic environment and flexibility is retained within the system this approach is a pragmatic response to pressure on resources.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- These initiatives are welcome. More evidence for the economic, community and cultural benefits of heritage protection would be helpful in making the case for preservation and enhancement of the historic environment at local and regional levels in particular.

19: What impact do you think the plan might have on people in island communities? - It is important that the strategy recognises the specific challenges and opportunities within island communities, and that these will vary from island to island.

Response ID: 33

The City of Edinburgh Council

7: Do you support the vision, mission and overall approach? - As an overall vision, it is acceptable and we would welcome collaboration but further details are required as

to how this would work in practice; and what support would be available to local authorities in terms of resources.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - Use of “protected historic places” sounds like an acceptable substitute for “designated historic places” on the proviso that there are no unintended consequences. For example, if “designations” is used in legislation and development plan policies etc., what would be the potential legal implications of the change? We advise that HES are seek a legal opinion on this.

9: Do you agree with our four priorities for the next three years? - Developing a robust long term strategy is prudent. Agree that information needs to be reviewed and kept up-to-date. Agree with the principle of making timely decisions as this has implications for planning authorities in delivering their statutory functions. However, it is unclear how these will impact on local authorities and the statutory planning process for example where consultation responses to local authority’s fall within HES’s priorities? Some of the language used in the objectives is not that legible - what is meant by redesign’ our public offer’ - think about a more Plain English approach."

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - It would be important to understand what collaboration is envisaged with local authorities as well as the implications of these initiatives on the responsibilities/workload of local authority planning departments, which are under significant budget and staff resource and time pressures? Is there an expectation from HES that local authority planning departments would take on responsibilities/roles that HES would stop doing?

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - It would be good to understand how this approach aligns with the relevant planning legislation including what statutory basis there is for protecting and managing undesignated sites, especially where demolition may not require planning consent. As local authorities are starting to develop new style local plans following NPF4; it is important that HES is working with local authorities now as to how 'undesignated' sites can be identified and protected through planning policy.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- It is unclear how this is likely to impact on the resources, including financial and staff, of local planning authorities. It would be helpful if HES works closely with local authorities to understand their needs but also to ensure compatibility of data and data sharing.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- There is a concern that if HES may intend to stop providing some of its services that there will be a requirement or expectation that local planning authorities would have to take up the responsibility of providing that service.

Planning authorities are already under financial pressures and staff resources is also an issue. Furthermore, there is a concern that not all local authorities will have the technical conservation expertise to carry out responsibilities that will fall to them if HES stop doing them. Measuring the progress should include seeking feedback from key stakeholders, including local planning authorities, on the impact of the changes on meeting its statutory and non-statutory functions. There are implications for local planning authorities in term of staff resources and finances that require to be factored in, and if the changes are implemented, monitored.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- The issue is whether there are other means in place i.e. clear guidance/advice on your webpages that people can use instead of a direct response to their request. It is important that HES's webpages are user friendly so people can access information in other ways if you are not providing a direct response. There would be a concern that there is a displacement of requests to local authorities where there are resources pressures. It is agreed that new designation requests should be prioritised especially where there is development pressure.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Agree with this approach.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Generally agree. This approach will show openness and transparency. However, it is important that this is balanced with funding and actions to actually protect heritage and not just measure the impacts.

17. Please share your views on the impact research themes we are considering - Agree that these three research topics could be useful. A large amount of research has been undertaken on these areas so it is queried what new conclusions this research will arrive at. The issue is what you do with the information and what implications it has in translating it into practical action that helps to conserve heritage and ensure it has a continuing use. Carrying out good quality, technically suitable heritage protection measures can be expensive, including but not limited to, use of appropriate materials and employing specialist tradespeople. There are therefore cost implications. It is important this this is adequately funded to ensure practical measures are taken to conserve heritage on the ground.

18: What impact do you think our strategy would have on people with the following characteristics? - Presumably HES will carry out an Integrated Impact Assessment of their proposals that take into consideration the above. Regarding social-economic background, if fewer designations, there would be fewer restrictions placed on owners of buildings/properties and consequently potential financial benefits to those owners.

21: Please provide any other comments on our strategy in the box below. - Careful consideration is required on what impact this will have on the resources of local

planning authorities and to make sure you collaborate to make sure systems and processes work well for both parties.

Response ID: 34

Docomomo Scotland

7: Do you support the vision, mission and overall approach? - Broadly, the vision, mission and approach statements are appropriate; they echo the language that is used elsewhere in HES policy which is of a type. We wonder if any of these statements could provide a little light and shade ie admit that this is a complex area of HES's work (and particularly that stakeholders, who are numerous, have different expectations of the department ie. what a member of the public wants re their Cat C listed house is very different to a community group concerned about a local building, or a planning officer at the local authority, or a developer or owner of large, commercial site with heritage assets). Admitting this is a difficult area is not a weakness, its transparency. Additionally, we would make the following comments: Vision: We think committing to providing 'consistent' information (does this essentially mean the records?) is rather ambitious given the no of records that exist (55,000?) - with new records, perhaps, but not the List in its entirety? Mission: We welcome the ambition for HES to lead on 'identifying' (historic places) by 2035 because we do not think HES Designations necessarily does this now because proactive thematic, project and survey work is largely at a standstill, and has been for some time, and much of the work, as noted in this survey, is reactive (ie relying on external proposals for assessment - it would be disingenuous to say we are leading on identifying by dint of external submissions that the HES may go on to list etc). However, to say HES will lead on identification would require a fairly significant remoulding of the departmental approach (which we think is required and would be beneficial). Will staff be empowered to propose assessments (which we understand is currently not allowed)? Approach: We welcome the aim to work with 'partners, develop staff, and invest in research' but these areas require fleshing out (we understand they are necessarily vague for the sake of brevity in this context); we think these areas have been neglected in recent years as the department has become a largely reactive service. Again, to genuinely achieve this aim, the department is likely to require reshaping.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - DS would welcome using 'protection' for its clarity and accessibility as a term. However, experience shows that it can take a long time (decades, or even not at all) for the public and even sector/stakeholders to acclimatise to new terminology or titles (even if you are swapping a 'less understandable' term for one that is deemed more accessible etc) so I think any expectation that this may transform how the public understand HES designations work needs to be managed slightly - nonetheless, we support the proposal (notwithstanding that 'designation/designate' will remain appropriate terms in some areas). Additionally, the

potential 'return' to the use of the term 'protection' is interesting in the sense that in recent decades the heritage agencies have been encouraged to use more neutral language, to ensure that activity like designation (especially listing) is not viewed as a burden or a blocker to change. Reintroducing 'protection' would be a small counter to this unevidenced slide.

9: Do you agree with our four priorities for the next three years? - Objective 1:

Looking ahead - HES will lead a collaborative and inclusive conversation to develop and publish long-term (10-year) priorities for heritage protection by March 2028. DS think this should be the priority (what does a conversation mean in practice - consultation, forums, 121s with stakeholders?) - we hope this will get to granular details (ie identifying areas where HES designations will progress proactive work into, for example, threatened building typologies, under represented typologies, and activity to capture 'coming of age' architecture ie. 80s/90s/2000s. DS would like to be involved in informing that process.

Objective 2: Improving our information - by March 2028, enhance the clarity and accuracy, accessibility and useability of our data and substandard designation records so that Scotland's historic protected places are better understood and valued. This seems overly ambitious and very resource heavy (and potentially distracting from Obj. 1)? Maybe some designation records can remain, without real consequence, 'substandard'? In this respect could HES focus on enhancing the 'most used/accessed, substandard' records - that would feel like a responsive approach?

Objective 3: Improving our service - redesign our public offering to deliver timely decisions, publishing details of a revised approach in 2025/26. Unclear on what this would mean in reality - a redesigned 'public offering' may well be desirable but 'timely' is subjective? DS would welcome the opportunity to comment on any draft approach. Objective 4: Understanding our impact - by March 2027, capture and communicate baseline evidence and insights into the impacts of the current systems of heritage protection. While we understand that is a HES style objective, we feel this is potentially a distraction at a departmental level from core work/priorities, certainly Designations work data could be shared (for example with HES Conservation - to inform pilots/projects related to designated assets?) but DS strongly feel this could eat up valuable staffing time for no discernible gain (ie more funding, staffing, resources).

10: Views on proposed initiatives under objective 1 and how we intend to measure progress

- DS consider this approach largely appropriate however, staff and staff expertise is overlooked in favour of external input and we consider that staff should also have the opportunity to inform the process of identifying and agreeing priorities. The use of the term 'amenities bodies' is a little misleading as the amenity system doesn't exist in Scotland (there are no statutory consultees beyond HES for heritage-related apps etc in the planning system, the AHSS doesn't even have this formal status) - perhaps this section could also include (given the amenities such as C20 Society, Vic Soc may want to engage, even if their focus England/Wales). Therefore we would request that this is revised to include something like 'campaigning and interest groups' (this would capture many of the smaller groups that exists in Scotland who could valuably feed into any knowledge sharing activity). Collaboration with external groups,

bodies or organisations to deepen and develop heritage protection work (ie projects, surveys) would be very welcome and strategically, would position HES Designations as outward facing rather than insular in its approach.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - Yes, in theory! HES should utilise its leadership role more in relation to heritage protection and avoid being too drawn on whether it is imposing on, for example, local authorities. This is perhaps most relevant to discussion of conservation areas (an area HES seems to have withdrawn from being proactive on entirely) and, as noted, heritage which is not nationally designated but of local value (England has the imperfect local listing system, this seems an obvious gap in Scotland's set up?)

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?-DS has provided previous responses as part of this survey expressing concern about the resource-sucking potential of this ambition and the associated timescales and we think some care is required about the commitment. In particular, as currently phrased, 'Engaging with users to inform them about known issues with our records, encouraging feedback on inaccuracies and prioritising areas for action' seems hostage to fortune. Additionally, Reviewing and prioritising records with inadequate descriptions or statements of significance, 'especially in areas of high development / landuse pressure' feels like an objective driven more by Government agenda; on some occasions, reviewing records to bring them to a useful standard is a 'win' for both for heritage and new development but DS would advise caution about prioritising resources to enable/drive that new development.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Both 'Formalising our prioritisation of external requests according to the level of heritage risk and impacts on people and communities' and 'Adopting a dynamic risk-based approach for research and assessment. This is likely to result in shorter assessments, records and reports' seem very sensible. As a proposer of designation applications and with an awareness that HES receive a very high level of new applications (impacting on case timescales), it may also be worth revising the set up to consider tools such as: applying a grants type structure for accepting new proposals ie submissions only accepted during two quarters of the year, to provide some breathing space, and offering a two-lane set up so people can 1. just flag up information or similar about a site/building/asset rather than submitting a formal app and 2. submit a formal proposal. 'we will explore greater use of technology to automate or expedite tasks' - while this has potential benefit as it may free up staff time for more complex work, care will be needed to ensure communications do not suffer (we are all aware of how automated correspondence can alienating and frustrating). We think this is an acceptable approach and here, it is appropriate to include the context 'especially in high development/landuse pressure areas' - could it include 'at risk' as well - we know HES doesn't do 'spot listing' as such, and predominantly backs away from

cases where there is any development/planning context, but perhaps this should be reviewed?

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?-We think it would be fair to prioritise reviews where inadequate records are having a negative impact on (the assets) management. We would suggest that 'Adopting a dynamic risk-based approach for research and assessment. This is likely to result in shorter assessments, records and reports' would be beneficially applied to address/category changes and minor corrections cases - more dynamic use of staffing may help address this area of work, too?

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- As expressed before, DS is concerned this is a misdirection for valuable resources and staff time - while you state that 'Feedback indicates that the benefits and impacts are unclear' is there a genuine demand for HES Designations to invest resources into data gathering and research of this type, at a departmental level? Who is demanding it? We appreciate the impetus and of course it aligns with HES ethos, but it shouldn't be a priority.

17. Please share your views on the impact research themes we are considering - As above, we do not consider this kind of activity a priority at a departmental level and also that this type of work, when effective, is a separate specialism - as before, providing information to other teams, for example, Conservation, on designation cases where a typology may present opportunities for new investigation/research eg. regarding environmental data of modern architecture, would be great - that is the kind of research than can then be usefully promoted to stakeholders and public via different comms channels.

18: What impact do you think our strategy would have on people with the following characteristics? - We are not sure this is an area we can usefully comment on.

19: What impact do you think the plan might have on people in island communities? - Potentially welcome in the potential proactive identification (and protection) of typologies associated with island communities.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - While we appreciate the context of asking the question in relation to HES's national strategy/vision, but impacts of this type are not our primary concern. We do think some of the approaches may impact how heritage is perceived within the planning system (regulatory?) system, especially if a more proactive approach to identification is adopted.

21: Please provide any other comments on our strategy in the box below. - Overall, we welcome many aspects of this strategy, including: - the commitment to

leadership, proactivity, engagement and research, starting (or reverting) to (heritage) protection - A more systematic approach, with something that could look like a proactive programme of activity based on expertise and the pursuit of knowledge. However, as I'm sure you are more than aware, resourcing will be key (tech and new partnerships will help but will also bring challenges of their own). Designations (or heritage protection!) is complex, requires skill, and is ultimately people-intensive and a strategy that doesn't attend to the resources required to deliver it will likely fail. To this end, we think the strategy somewhat overlooks staff, current and future – they are the critical delivery resource, and how the department is structured to develop and motivate staff needs consideration - a more flexible, based on need and development, structure should be considered. Additionally, DS do not want to see inhouse expertise and and genuine professional development being driven down by, for example, hiving out to external parties, all of the most interesting research work. Working with partners and commissioning some forms of research is fine, but it must have a limit if you don't want a brain drain. Any approach like this would be very demotivating and create a reputation of a type of anti-intellectualism – perhaps pockets of the less engaging and largely routine work could be hived out instead?? It may be worth considering the work of the investigators at Historic England and how they approach new research (ie the balance between in house and commissioned) and how they work with designation colleagues. Proactive leadership means a level of engagement with key partners that isn't really present now (and probably hasn't been in the life of HES). To address that will require a less cautious/timid approach in the delivery of HES's statutory role. There is a huge job to be done advocating for the role of conservation in planning and promoting economic development, sustainability and place-making and we hope the best elements of this strategy has a place within that.

Response ID: 35

Historic Houses Scotland

7: Do you support the vision, mission and overall approach? - Historic Houses Scotland is the representative body for 180 category A and B independently owned houses, castles, and gardens across Scotland. In 2024, our members welcomed over 1.9 million visitors, generating over £20 million in visitor expenditure and directly employed 1,150 FTE staff. Our member properties range from the iconic Dunvegan Castle and Scone Palace to more intimate houses such as Traquair and Cambo. Broadly, Historic Houses Scotland supports the vision of Historic Environment Scotland. It is crucial for Scotland's cultural and historical landscape, and the economic and social benefits that are provided through that landscape, that historic places are protected through rigorous legal protection. Historic Houses Scotland welcomes a vision that seeks "to more fully reflect Scotland's rich and diverse heritage". However, this approach must be sustainable and not at the expense of well-established protected historic places. In terms of the proposed mission and approach, it is welcome to see a desire to create a

forward-thinking, long-term strategy that will protect Scotland's historic places. Currently, historic places in Scotland are facing a variety of issues from a lack of skilled retrofit installers, a reduction in, or lack of, funding, and the impact of climate change. It is crucial that HES's strategy is proactive in its approach and ready to support these places in order to help retain them for posterity. The approach is very ambitious for an organisation that is strapped for time and funds, with such a high-level of responsibility for the heritage sector, and therefore the tourism and creative sectors with which it is interwoven. HES should be prepared to fail, without it being a fault, in some of these endeavours, and be ready to shift priorities once it becomes clear how much is actually achievable.

9: Do you agree with our four priorities for the next three years? - Broadly, Historic Houses Scotland agrees with the ambition of HES as set out in the four priorities. We will share some concerns below about the achievability of these priorities considering HES's records-upgrade backlog, inadequate funding, and a stretched, small team.

Overarchingly, we would ask the HES reflects deeply on the primary purpose of designations: the protection of sites of special architectural or historic interest. This protection is not about placing buildings in aspic; the greatest way to ensure a building will survive for future generations is to allow it to have a useable function. This might be as a tourist site, a community centre, or, for a house, still lived in as a domestic dwelling. Additionally, owners of designated historic sites should be well-placed to use their heritage asset as a business opportunity. Generally, heritage needs a function if it is to be maintained and sustained. This means that protecting these buildings means allowing them to be, where appropriate, slightly modified to make them future-proof. In terms of net-zero targets, this could mean allowing installation of double glazing, for example. We know that designations are a positive driver of the tourist economy. Rather than viewed as a further piece of bureaucracy, designations could be viewed as something more positive: a driver of culture, history, and public engagement. It would be positive if HES could use this idea as a foundation for its strategic priorities going forward.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - As the proposal states, and the stakeholder engagement review found, there is "limited interest in major legislative changes" to the way HES operates. Historic Houses Scotland would agree with this. HES does not need a significant change to its function or the way it delivers designations. Historic Houses Scotland welcomes HES's plan to strategically engage with a variety of key institutions including amenity bodies and local authorities. Designated historic sites are interwoven into the fabric of local, regional, and national identities and play a vital role in shaping the communities around them. Ultimately, if done correctly, this would prove to be good for place-making, good for local economies, and good for heritage. It is vital that any "collaborative and inclusive conversation" finds appropriate partners to work with. For HES, this must include working closely with owners of designated historic sites. Most designated houses are owned privately. Owners of designated historic sites know the issues that impact heritage assets in intimate detail; the feedback of private owners would provide a vital dataset on the efficiencies/inefficiencies and the success/failures of the designation

system. Their insights would prove to be invaluable in establishing robust, long-term priorities for heritage protection. Historic Houses Scotland would also welcome the opportunity to work with HES in developing their long-term priorities for heritage protection.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - As it stands, HES is clearly in a difficult position when it comes to workload. As stated, the 2015 introduction of a system of appeals has placed a strain on HES's ability to meet necessary work capacity. For this reason, it makes sense to ease this burden through closer collaborative partnerships with other institutions, like local authorities. However, it is crucial that any aspect that will be "led by local authorities" is given an appropriate level of financial and staff support. Local authorities are often stretched, and this leads to delays in areas related to heritage like planning application responses, particularly in matters relating to listed buildings. It is important that HES does not simply pass off work that is beyond its capacity, to local authorities that also lack the capacity to complete the work. In the stakeholder engagement review produced for this consultation, Heads of Planning Officers (HOPS) highlighted their concerns that "this exercise would be a way to pass on work to local authorities" that are already stretched. A further concern is that a greater reliance on the use of local planning authorities creates an inherent unfairness depending on the location of a designated heritage asset. One local authority may be very efficient, while another may have a significant backlog. This will lead to unbalanced systems with some heritage sites benefitting, and some being impeded, from the accident of which local authority the site sits in. All this being said, local authorities will have a good awareness of designated sites, and sites that may meet the requirements to be designated. For this reason, regardless of who leads on specific aspects of the designation process, HES must work more closely with local authorities. It is therefore vital that greater resources are offered to local authorities to meet these obligations that impact heritage, tourism, and local/regional economies. Before accepting this aspect of the proposal, it would be necessary to see a more detailed account of how this "integrated and comprehensive approach" would work in practice.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- It is vital that HES holds up-to-date, accurate data of the sites it seeks to protect. As HES recognised in its internal evaluation in November 2023, just 7% of HES's 55,000 records currently meet the desired standard. This leaves over 50,000 records that will need to be improved. This is an enormous task that will require large portions of funding and time. HES will need to make difficult decisions when balancing this project with its wider work. Is this project deliverable? Is it affordable? What are the timescales? While supporting the aim of this approach, Historic Houses Scotland would recommend a proportionate amount of funding and energy is placed on this ambition. It will be necessary to have a clear triage process to determine how this priority will be achieved and to determine exactly what success would look like. That being said, it would be a great shame to see online records of historic places improving, while physical sites deteriorate. Historic Houses Scotland would like to also raise

concerns about additional bureaucracy and administrative responsibilities that may be passed on to the custodians of historic places through this approach. Custodians of historic sites are often operating within tight budgets with stretched resources; further time burdens placed on these custodians could be detrimental to heritage sites. Ultimately, this change may put added pressure on independently owned heritage.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- HES will need to streamline its processes if it is to achieve its ambitions. AI will almost certainly bring some relief to the administrative responsibilities of HES. However, until that technology is truly here, it cannot be relied on. As this approach is central to HES's path to success for this strategy, it is essential that enough funding (and associated skills building) is ringfenced in order for HES to take advantage of this new technology as it develops. Equally, while AI will be useful for administrative responsibilities, it is likely that judgements will still need to be led by humans. While easing some administrative burdens, it will not be a catch-all solution. Historic Houses Scotland has concerns about HES "Formalising our prioritisation of external requests according to the level of heritage risk and impacts on people and communities." E.g. how will "impacts on people and communities" be measured? And, what is the possible impact on heritage that is deemed to not have a significant level of impact on people and communities?

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- It would be valuable to have a detailed explanation of what is meant by "under-represented sites"? Almost by definition, the majority of sites with some historic or architectural significance will be under-represented as many other buildings from their period will already be lost. Does HES have a list of sites that are correctly, or even over-represented, through the designation scheme? There is a risk that by focusing on "high development" sites, rural sites may be neglected. These sites, though rural, can still have significant importance to their local communities and impact on people. Some questions we'd like to raise are: how will "impact" be measured? Is this aligned with actual the function of HES? It is possible that this approach may induce some pushback from heritage stakeholders who feel that their heritage assets, that meet all of the criteria for "special" historic or architectural interest, are being overlooked for other sites. For this reason, HES should be careful to clearly articulate its decisions and provide definitions of key words in its criteria.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- It is important in this regard for HES to reflect on the purpose of designations. It is the responsibility of HES to protect heritage across Scotland, not just sites in "high development/land use pressure areas". This is not the fairest approach to heritage protection and will likely lead to a reduction in energy towards heritage in rural areas, where heritage sites are often central to local communities and economies. HES should consider the negative ways that prioritising sites may impact heritage. What might not be a priority for HES, may well be a priority

for the owner. This should be kept in mind when reviewing the priority level of a request: a “minor correction” might have a big impact on a place.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- As mentioned above, HES is stretched when it comes to workload and funding. Measuring impact is important, but it is also a time-consuming, complex process. HES should be prepared to not meet some of these priorities. It may be the case that, within these four priorities, a prioritisation must take place to choose which are most central to HES’s core functions.

17. Please share your views on the impact research themes we are considering -
Economic: One of the central concerns of Historic Houses Scotland is that owners of historic properties are empowered to monetise and continue to make their properties suitable for modern living where possible. Through continuity and commitment, owners of historic properties maintain Scotland’s heritage with each generation making their own contribution. By using their historic property as a business asset, Historic Houses Scotland members are able to benefit their local economies through attracting tourists or hosting special events, like weddings. To protect and preserve historic buildings, owners must be able to generate revenue in some way. Wellbeing/social/community: Historic Houses Scotland members provide enormous benefit to their local communities by enabling access to culture and beauty. Historic Houses Scotland would be pleased to provide evidence in relation to the work of our members in their local communities. Environmental: It is important that any serious desire on behalf of HES to measure the contribution of historic sites to net-zero strategies takes into account the difficulty that owners of category A, B, and C-rated properties have in making positive changes to their buildings energy efficiency. Simple, low damage changes, like the installation of double glazing is currently a long, drawn out affair. A streamlining of this aspect of the planning system, that allows low risk alterations to properties would be an excellent start to building a net-zero future.

Response ID: 36

Jenny Munro on behalf of The Royal Town Planning Institute Scotland

7: Do you support the vision, mission and overall approach? - We are broadly supportive of the vision, mission and overall approach set out above. However, although we agree the general importance of protecting Scotland’s historic places, we do not feel the vision, mission and approach go far enough and are missing a critical element which sets out the purpose and importance of heritage designation in Scotland. For example, what do we mean by “historic places” (in the vision) and why is it important for our historic environment to be “well managed for current and future generations” (in the mission). Although we do not expect all the detail to be set out in the vision, mission and approach, at least some of the “Why” should be addressed to create a meaningful connection with the intended audience. As an example, in the mission, this could simply

be a case of highlighting the social, cultural and economic importance of preserving past traditions and cultures through the careful management of historic sites and remnants. In addition, we would welcome alignment in the vision with the purpose of planning introduced in the Planning (Scotland) Act 2019, by including reference to the "long-term public interest" of current and future generations.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - We do not have any significant objections to this proposed change, given that it appears to be purely linguistic in nature with no impact on the purpose, intent and impact of designations themselves. Notwithstanding the above, we do wonder if a potential unintended negative consequence could arise whereby the use of the word "protected" triggers a blanket "no-change" perception by the public. Managing and maintaining historic assets may, in certain circumstances, require carefully considered alterations and interventions which continue to preserve heritage qualities and/or which balance the importance of protecting historic sites with the need to (as an example) achieve climate resilience and meet our net zero targets. Heritage preservation does not always mean keeping things exactly the same indefinitely to the detriment of other considerations, and this should be clear in the final strategy. HES' series of guidance entitled "Managing Change in the Historic Environment" usefully set out the key principles of managing (rather than preventing) change, recognising that change is necessary for historic buildings to stay in use over the long-term. It will be important for the final strategy to adopt this similar language to ensure that by protecting Scotland's historic assets, we are not preventing their long-term continued use and (therefore) viability and survival.

9: Do you agree with our four priorities for the next three years? - We broadly agree with the objectives set out above, albeit that they are very broad with little detail. We are particularly supportive of the capturing and communication of baseline evidence as set out under Objective 4. We have consistently called for improved, consistent and accessible evidence-based data to support the development and monitoring of policy and decision-making practices across Scotland. We are, therefore, pleased to see this proposed to be included as a clear objective within the strategy.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - Although light on the detail, we are broadly supportive of the high-level intent of the proposed initiatives. We would strongly encourage HES to view the planning profession as a critical aspect of the collaborative and inclusive conversation, particularly to ensure a clear understanding is gained regarding the knowledge, skills and data needed for quality decisions to be taken in relation to heritage sites and buildings. In addition to the above, we draw your attention to our response to Question 21, which sets out in more detail our broad concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - We agree that there needs to be a 'whole-system' approach to heritage protection that involves those aspects led by Scotland's 34 local and national park authorities. Not all local and national park authorities are the same in terms of the heritage qualities to be preserved and the associated challenges this brings. For example, some authorities will have a significantly larger number of listed buildings compared to others, some will have more archaeological sites and features that require careful management, whilst others will have sites affected by a World Heritage designation. As mentioned above, these conversations must also include an understanding of the knowledge, skills and data required for quality decisions to be taken in relation to these varying heritage assets. They also need to have regard to the unique context and circumstances of each local and national park authority. This is particularly important in light of the resourcing pressures currently being faced by authorities, which have seen many of them losing the in-house heritage and archaeological expertise required to deliver the heritage outcomes and associated community benefits as set out in the vision of the proposed strategy.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- We are supportive of the broad intent of the initiatives and measures set out above. As previously mentioned, we are pleased to see information, evidence and data gathering as a key objective of the proposed strategy. However, the success measures under this objective are incredibly broad and lack the precision and detail necessary to be considered an effective measure. For example, in "gathering public feedback on our records" there is no sense of a benchmark as to the quality, type, and range of feedback required to achieve the level of success for the objective to be considered met. As currently drafted, feedback from just one individual, group or community could tick off this success measure when in fact it would fall significantly short in achieving the objective. We would welcome a clearer sense of the ambitious outcomes hoped to be achieved and measured through this strategy. In this regard, we draw your attention to our response to Question 21, which sets out in more detail our concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- We are broadly supportive of the initiatives and measures set out above. In particular, we support the use of technology to streamline and enhance public engagement and decision-making processes. Whilst we understand the need for prioritisation and streamlining to address HES' internal capacity requirements, this should not be at the expense of the important external services that HES provides, including as a key agency and statutory consultee. For the planning system to work effectively and efficiently, statutory consultees play a vital role. We have heard from our members that one of the things that can hold up planning decisions are delayed responses from statutory consultees. It is important that in meeting the objective to reshape the service, it includes an examination of how HES currently meets its statutory consultee requirements with a view to ensuring that any reshape of the service

enhances (and does not in any way diminish) their role as a statutory consultee. In addition to the above, we draw your attention to our response to Question 21, which sets out in more detail our concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- No comment other than to reiterate the above point that any reshape of the service should not be at the expense of HES' role as a key agency and statutory consultee.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- As above

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- We are broadly supportive. As previously mentioned, we fully support the capturing and communication of baseline evidence. We have consistently called for improved, consistent and accessible evidence-based data to support the development and monitoring of policy and decision-making practices across Scotland. We are, therefore, pleased to see this proposed to be included as a clear objective within the strategy. Once again, the success measures lack detail and precision. The first measure “to begin to measure the impacts of heritage protection” suggests that this has never been done before and ignores current monitoring initiatives undertaken through, for example, Scotland’s Historic Environment Audit. The second measure of “reporting on our findings” also lacks detail and precision regarding the intended audience, purpose, and outcomes of such reporting. It is in these details that the measure of success can be captured, rather than through the action of reporting alone. We would welcome greater clarity as to how success will be measured against a clear baseline of what is already being done, as well as further details as to the outcomes that will determine a successful measurement of success. In this regard, we draw your attention to our response to Question 21, which sets out in more detail our concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

17. Please share your views on the impact research themes we are considering - We are broadly supportive of the broad research themes, albeit we would welcome additional details regarding the audience and outcomes – i.e. whose understanding is to be enhanced through this research and gathering of baseline evidence, and for what purpose. Under the theme of Wellbeing/social/community we would welcome evidence around the impacts and contributions of heritage protection on and to Scottish Government policies - for example, local living and community wealth building.

21: Please provide any other comments on our strategy in the box below. - Although we are broadly supportive of the overarching objectives, initiatives and measures set out above, it is our view that “Outcomes” is a missing element throughout the consultation paper. For example, under Objective 2, although the headline objective

touches on the reasons for enhancing data – i.e. “so that Scotland’s historic protected places are better understood and valued” – it does not go into any further detail to explain why this is important, whose understanding will be improved by the objective, and what outcomes will be achieved by meeting the objective through the initiatives. Likewise, although Objective 4 explains that it seeks to enhance understanding it does not go into any detail of whose understanding and for what purpose. This gap results in a disconnect between the objective, initiatives and measures which in our view will weaken the overall integrity and impact of the proposed strategy. The outcomes must not merely be lightly touched upon (as they are currently), they must be fully embedded within the language and structure of the strategy to join the dots between the objective, initiatives and success measures to ensure that they have the substance that we believe is currently lacking. We would welcome further consideration and inclusion of this missing element in the final iteration of the strategy.

Response ID: 37

The Royal Incorporation of Architects in Scotland (The RIAS)

7: Do you support the vision, mission and overall approach? - We suggest more proactive and less passive language to deliver greater impact that shows more precision and intent. For example: Mission - Historic Environment Scotland (HES) identifies, protects, and records Scotland’s most significant historic sites. We will ensure their value is understood and recorded* . This will support planning authorities and others to make informed decisions so that the historic environment is cared for today and safeguarded for future generations. Approach - We will collaborate with partners to modernise heritage protection, making it responsive to Scotland’s evolving economy** , society, and environment. Together, we will set strategic priorities, invest in research and technology, and support workforce and volunteer*** development. By embracing innovation, we aim to deliver a proactive, well-resourced, and accessible service that earns public trust and supports informed decision-making. Correcting the omission of economy is an important and necessary improvement.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - We support the inclusion of the term “protected” but believe it is important to retain the reference to “sites.” The term “site” is more geographically specific and bounded, whereas “place” is currently overused and less precise. Retaining “sites” supports accurate geographical tagging and record-keeping. A “place” may encompass multiple overlapping site designations, which could create confusion. The use of “place” should also be carefully considered in relation to relevant legislation to avoid ambiguity. For maximum clarity across all designations, we recommend using the term “protected sites and structures.” In contrast, retaining “place” risks confusion with Conservation Areas, which, whilst statutory, are only quasi-national designations administered by Local Authorities.

9: Do you agree with our four priorities for the next three years? - The first objective is too vague and unfocused. We recommend that Historic Scotland take the lead in initiating a national debate to define long-term priorities for heritage protection, particularly in relation to the allocation of limited resources. This debate should result in clear decisions about how resources are deployed, including an understanding of the associated consequences and trade-offs. The fourth objective is supported, but it should place greater emphasis on understanding the cultural and economic value of these sites.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - This objective must be refocused on decisions on resource spending. Otherwise, the conversation risks wasting stakeholder time on a wide range of aspirations which can't be delivered. The conversation should at least consider the priorities for legislative consolidation, even if this will be sometime in the future.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - Yes, we fully support a system wide conversation. We believe the future management of Conservation Areas requires urgent attention. A national debate on the role of Local Authorities in managing the suite of national designations is critical. The capacity and role of charities and volunteers in maintaining the system must also be considered.

12: Give us your views on our proposed initiatives under objective 2 and how we intend to measure progress?- These initiatives should be cross-referenced with discussions on the future of the Buildings at Risk Register (BARR).

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Initiatives to support and strengthen Local Authorities are urgently needed. For example, HES could enhance heritage capacity within the proposed planning hubs, offering secondments or associate roles (following the Public Practice model), and embedding officers from historic environment organisations in council departments.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Given resource constraints, some degree of prioritisation is necessary. However, HES must approach this with great care, as the risk of unintended consequences for certain types of sites - or a loss of public confidence - could be significant.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Given the constrained resource situation, this approach is supported in terms of managing changes for lower-impact cases. However, these sites should still be addressed within reasonable time limits, even if immediate action is not a priority. Indefinitely pausing non-urgent work merely stores up future problems; therefore, a baseline level of effort must be maintained.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- We support this approach.

17. Please share your views on the impact research themes we are considering - Obtaining robust economic data is a priority for justifying continued investment in the designations strategy and will also provide evidence to support engagement with certain property owners.

18: What impact do you think our strategy would have on people with the following characteristics? - The strategy must consider accessibility for disabled users when accessing digital or physical records. This should not be an afterthought. It should also consider that certain sites are associated with specific religious denominations. Given Scotland's complex religious history, from the Reformation to the mid-20th century, this requires careful handling. Socioeconomic background should be considered at a strategic level when designating sites, particularly in balancing heritage linked to the former nobility or upper classes with that found in working-class industrial communities. Unconscious bias must be avoided, including addressing any outdated views of what heritage is and who it is for. This must form part of the conversation led by HES under objective one.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - Further work would be required to determine this. Negative economic impacts on owners would clearly be reduced if repairs and maintenance of designated sites benefited from VAT exemptions. Positive economic impacts - particularly for businesses providing traditional building skills - must also be assessed.

21: Please provide any other comments on our strategy in the box below. - The future of designations depends on the overall level of available resources, which is a political decision. Scottish Ministers, Councillors, and the public should be made aware of the long-term consequences of funding constraints—such as the potential loss of sites—as well as the benefits of a properly resourced service. HES must initiate a critical conversation about how Local Authorities are managing and maintaining Conservation Areas, and the absence of resources for this function. There is strong anecdotal evidence that many of these historically significant areas are in long-term or terminal decline. This must be verified, and appropriate emergency measures put in place to prevent significant and irreversible heritage losses.

Response ID: 38

Derek Rankine on behalf of Built Environment Forum Scotland

7: Do you support the vision, mission and overall approach? - Yes, BEFS Members are generally supportive of the development of a new strategy and some of its key elements. There is agreement on the need for a new strategy at this time given changing

technologies, opportunities, working practices and expectations. Many of the findings of the MainStreet stakeholder review in Autumn 2024, particularly on the need to fill information gaps and to do more to recognise emerging heritage, resonate with BEFS Member views on priorities. There is, however, clear desire for more clarity on the detail of initiatives, and for the strategy to be bolder and more ambitious in general. There are also concerns about the capacity and resources available within Historic Environment Scotland (HES) and the wider sector to deliver the strategy in practice.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views.

- The proposed change of terminology has provoked mixed views in the BEFS network. Some feel there is a clear rationale for using 'protected' instead of 'designated', with the former being better understood by, and communicable to, general audiences. Utilising the term 'protected' may also be preferable in raising ambitions above and beyond 'designating' an asset to a list. There are differing views on whether listing alone provided adequate protection to an asset through the planning system. Some BEFS stakeholder argue that 'designated', 'listed', 'registered' and 'recognised' are already well understood by the public, and may speak more accurately to the act of designating a status upon an asset, which may not hold the same guarantee as protecting it from excessive change, harm or demolition. One BEFS Member stated: "Various national and local policies and other guidance use 'designated' so a change from this is highly likely to create confusion... [it is] changing established and entrenched terminology which is likely to have a big impact for those working in Heritage Management." Other elements of the 'protected historic places' phrase also provoked debate. Some felt the word 'historic' was exclusionary towards emerging heritage, and anxieties were expressed that significant buildings, monuments and other assets that are important to local people, but which may date from a period that would not yet qualify as 'historic' by some definitions, would be overlooked. Some BEFS Members dislike the use of 'places' in this context. Some see alternatives such as 'sites' or 'monuments or buildings' more accurately reflecting the role of designations in protecting relatively small units of land and buildings compared to 'places', which is a label often applied to entire settlements and regions. Others felt 'places' was an unhelpfully vague term, despite its growing use in public policy language. In contrast, some consultees identified an admirable level of ambition in seeking to protect large places, and in thinking more broadly and holistically about heritage and place, above the fragmented level of individual buildings, sites and monuments. With regard to the Designation's Strategy vision in particular, it is difficult to satisfy all of these disparate views in a in a short, concise statement that cannot capture all complexities and aspirations, and which is intended to work across stakeholders in the heritage sector, professionals in linked policy fields and the general public. BEFS acknowledges this, but wishes to highlight the different views, preferences and understandings on the terminology in the built environment sector.

9: Do you agree with our four priorities for the next three years? - Yes, BEFS

Members general feel the four broad priorities align with the wider needs of the sector, although discussions have generated concerns that some areas of the strategy need to

be strengthened, and questions about where the capacity needed to make serious progress will come from. There are also calls for clarity on responsibilities, functions and implementation within the priorities.

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - The main area of concern for BEFS Members in this objective, is a low appetite for more strategies. The intention to create more strategic plans in the 2025-28 period is not popular with some BEFS Members in the context of views that that the sector has enough strategies at present, and a desire for more of a focus on action and implementation. Multiple BEFS voices warned against creating confusion by having strategies within strategies, and adding further to an already complex policy landscape for the designations system. There were also comments about the planned timescale. Some drew attention to opportunities to align the Designations Strategy with other policy initiatives and agendas, including health and wellbeing, climate change, 20 minute neighbourhoods, UNESCO designations, Local Place Plans, and community wealth building. A mapping exercise could be used to illustrate where the new Designations Strategy will link to the wider policy landscape around heritage and place.

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - Yes, BEFS Members are clear that HES and planning authorities have vital roles in the designations system, and that many other actors – such as charities, community groups, funders, local residents, equalities groups, academic institutions, and individual volunteers – also have an important part to play. Some felt the mission statement in particular should be for the entire sector, and that it should speak more clearly to people and communities. Several BEFS Members welcomed the strategy’s aspirations for wider collaboration, community buy-in and public outreach. There is firm agreement that a focus on the holistic system and cross-sector inclusion is helpful in pulling together resources from all heritage players and linked public policy areas to alleviate some of the issues with capacity challenges. Some BEFS Members, including funders and umbrella bodies that work directly with community groups, have drawn attention to undesignated heritage assets that are important to local people and to local economies, and which are the subject of community led campaigns, investment and refurbishment. They agree that undesignated assets and emerging heritage is an important part of the conversation.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- For BEFS Members consulted on the Designations Strategy, discussions indicate that this is the most important area for many. There is agreement that that this is a logical core component in the context of the MainStreet stakeholder review outcome around prioritising actions on improving the quality and quantity of useful information on heritage assets. This outcome resonated strongly with event participants’ knowledge and experience, and examples were shared of missing and inconsistent quality of records and information. Aspirations to improve current records and create new ones by piloting new techniques and technologies are welcome. Some feel democratisation provides a valuable and cost-effective route to improving

data collection, with reference to the success of Wikipedia and the growing involvement of community groups, charities, individual volunteers and academics in heritage research and promotion. BEFS Member Scotland's Garden and Landscape Heritage has drawn attention to the potential of crowd-sourced initiatives through their 'Glorious Gardens' initiative, which has recently used volunteers in Falkirk, Clyde & Avon Valley and East Lothian to record and share dozens of undesignated garden and landscape sites that do not yet feature in the HES Inventory of Gardens and Design Landscapes. Some enthusiasm was expressed for AI tools, which are referenced in the strategy, and digital systems like OASIS and Trove. Others said technology and crowd-sourcing is no panacea for the data gap challenge, that there are many nuances, and that clear criteria, templates and review processes should be used for public contributions, AI tools and digital initiatives to manage the quality and relevance of submissions. Some BEFS Members feel that there is not a clear enough link between this priority and the others. There is a concern the wider strategy lacks boldness and falls short of the ambition to be more proactive in protecting assets, as the provision of better information does not in itself lead to improved outcomes for protection.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- Some consultees found some of the initiatives and monitoring processes too general to usefully comment on. Objectives 3 and 4, which contain initiatives such as, "Reviewing and streamlining our processes", "Commissioning research to fill knowledge gaps" and "Expanding our communications through various channels", were picked out as being more difficult to engage with given a lack of detail. Several participants said they would like to know more about how these objectives would be taken forward in practice, and through which partners and delivery vehicles.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Several BEFS discussions have highlighted regional imbalances in designations at present, and suggest the strategy could usefully set out a targeted intervention for cold spots. The data management initiative to prioritise, "areas of high development/land use pressure" was seen as potentially working against a corrective to this patchiness, particularly with regard to rural geographies, low density settlements and places with low development activity. In the context of limited resources, some questions were asked by BEFS Members about what the strategy won't do. A comparison was made to filling a bottomless hole, and a need for HES and all players in the sector to continually prioritise and accept that not every ambition can be met. These questions included, whether the strategy should articulate any plans for de-designation of assets.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- There is some agreement on this approach to prioritisation within the BEFS network. BEFS Members with experience of downgrading requests, and appeals, in designations and planning processes, report that it takes a disproportionate toll in staff time. It was felt those same resources could be better used to identify and list current gaps in heritage in under-represented regions and

heritage asset types. There are, however, cases in which downgrading, reducing boundaries or removing outbuildings from a designation, can help to facilitate appropriate adaptation, refurbishment and retrofitting to bring assets back into productive use without fundamentally damaging their heritage characteristics.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- As per the response to Q13 BEFS Members invited to share feedback on this objective said that the content was too general or vague to usefully comment on. There is agreement that monitoring and review processes are important, particularly in a ten-year strategy, but would like to see more information on specific plans.

17. Please share your views on the impact research themes we are considering - There is general agreement on the value of these research themes, and BEFS Members are keenly aware of the economic, wellbeing, environmental, place-based and community-focused benefits that derive from heritage protection, promotion and access. This research could inform and support more collaborative efforts in future to include new audiences in all sides of heritage engagement, including recognising and promoting emerging heritage, and more frequently visiting and interacting with designated assets.

18: What impact do you think our strategy would have on people with the following characteristics? - BEFS Members in general would like to capitalise on opportunities to simultaneously widen heritage engagement and tackle diversity and equalities issues by working with new community groups of theme and place in delivery of the Designations Strategy.

19: What impact do you think the plan might have on people in island communities? - BEFS Members with stakeholders engaged with heritage in island communities refer to practical challenges, such as higher costs for repair and maintenance and poor access to contractors and specialists, that provide higher barriers to protection than mainland Scotland. As stated in our response to Q14, there are concerns that the initiative to prioritise, “areas of high development/land use pressure”, may lead to unintended consequences around negative designations system outcomes for these communities.

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - To reiterate part of the response to Q11, BEFS Members have expressed enthusiasm for the growing involvement of charities, community groups and volunteers in designations processes. Examples were given of community led initiatives in identifying, campaigning, fundraising, owning and managing heritage assets. More widely, there were suggestions that the Designations Strategy could help people understand why their places are important, and focus more on local vernacular and areas of deprivation. BEFS Members feel the economic outcomes of heritage investment activity is under-played, and that there are clear parallels between improvements in the designations system, approaches to protection, and opportunities for businesses and sustainable economic development,

including through tourism, building maintenance firms and supply chains, and town centre improvements.

21: Please provide any other comments on our strategy in the box below. - By way of a summary, recurring comments in BEFS discussions on the Designation Strategy indicate general support for its development and many of its key elements. There is a clear desire for more clarity on the detail of initiatives, and for the strategy to be bolder and more ambitious in general. With regard to the vision and mission, use of terminology including 'protected' and 'places' generated debate and mixed views. Clearer language and stronger links to community benefits were requested. Some criticised the focus on planning authorities and felt the mission statement described a passive role for HES. On the thematic objectives and initiatives, there was strong support for the strategy's focus on improving information quality, recognising emerging heritage and doing more public outreach and partnership collaboration. There are major concerns about the capacity and resources available within HES and the wider sector to deliver on these and other aspirations. Commitments to produce more strategies in the 2025-28 period were not popular with BEFS Members, and there were calls for clarity on responsibilities, functions and implementation. There was cautious optimism for technological innovation and the potential of crowd-sourcing information in future, while addressing geographic imbalances and improving integration with other policy areas are identified as areas of development.

Response ID: 39

Pegasus Planning Group

7: Do you support the vision, mission and overall approach? - Yes – the vision has potential to deliver a targeted approach to conserving the heritage of Scotland. Emphases on working with LPAs and other organisations such as the third sector and commercial organisations in advancing discussions are appreciated.

8. We propose changing how we refer to designation in our strategy and communications... Give us your views. - This has the potential to cause a great deal of misunderstanding when the whole picture is considered. Would non-designated assets be referred to as non-protected historic places? Misunderstandings surrounding the concept of designations are best addressed through communication. While planning permission may be granted for a site that causes less than substantial harm to the setting of a designated asset, referring to it as a protected asset may lead to a greater degree of confusion for the public, who may place an emotional attachment to the "protection" of assets.

9: Do you agree with our four priorities for the next three years? - Regarding Objective 2 the standardisation of entries for designated assets is welcome, outlining the

key components of the assets' significance as well as boundaries assessed where relevant

10: Views on proposed initiatives under objective 1 and how we intend to measure progress - In looking forward over the next 10 years consideration should be given to changing pressures on assets such as increased pressure to improve energy efficiency of buildings. These changing pressures and opportunities should be reflected in updates to HEPS and DPSG

11. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system? - While cooperation between all consultees is useful the legislative protections between designated and non designated assets are substantial and should not lead to the leaching of protections for designated assets into those of non- designated assets.

12: Give us your views on our proposed initiatives under objective2 and how we intend to measure progress?- As well as increasing the speed in which data is updated its also worth considering options to improve the quality of data gathered such as incorporating technologies such as lidar to provide more accurate boundaries for assets. Prioritising areas of high development/ intensive land uses is welcome however, with the range of development types across Scotland, such as wind development, solar, residential ext. there would be few areas that wouldn't be considered high potential. An option for a reactive/ dynamic update to records based on changing pressures should form an element of the approach. It would also be worth looking into gathering information from implemented planning consents on how assets have changed from their initial designations.

13: Give us your views on our proposed initiatives under objective 3 and how we intend to measure progress?- A formal approach to prioritising responses based on risks could be beneficial however a full understanding of triage system should be fully understood and transparent. Its also important that any changes do not run counter to the first initiative of working with a streamlined process. Some form of risk based assessment may be beneficial for delivering higher level assessments and reports, however this should still be backed up with a level of robust explanation of how the findings were reached.

14. What do you think of the possible approach we set out for prioritising external requests for new designations?- Priorising under represented assets in areas of higher pressures in a very important priority however to keep on top of demand this should be one of ideally two or three approaches, including dynamic updates as required.

15. What do you think of the possible approach we set out for prioritising external requests for reviewing existing designations?- Agree – while complete accuracy of the record is important making more meaningful changes should be the priority.

16: Give us your views on our proposed initiatives under objective 4 and how we intend to measure progress?- Creating a measurable medium of understanding public engagement would be a very useful metric for measuring the success of engagement.

17. Please share your views on the impact research themes we are considering - A streamlined process that would be able to address a higher number of queries and requests would in the long term allow for more certainty in the system as records would be more accurate and up to date improving attractiveness to investors and developers, assuming a level of robustness is maintained. Using a measurable metric to understand public engagement has potential to allow engagement works to be focused around works that have a greater social reach , possibly helping reach extend to groups who would otherwise not be the target for works otherwise. By providing a degree of certainty, there is potential there would be a greater uptake in renewable energy developments helping with climate targets.

18: What impact do you think our strategy would have on people with the following characteristics? - Outcomes would be dependent on the engagement based on objective 4

19: What impact do you think the plan might have on people in island communities? - Outcomes would be dependent on the engagement based on objective 4

20: What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context? - Potentially positive impact- A streamlined process that would be able to address a higher number of queries and requests would in the long term allow for more certainty in the system as records would be more accurate and up to date improving attractiveness to investors and developers, assuming a level of robustness is maintained.