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Local Government, Housing and
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The Scottish Parliament

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Dear Committee

National Planning Framework 4 – Draft Plan Scottish Parliament – Call for Views

Thank you for the opportunity to provide our initial views on the draft of Scotland's Fourth National Planning Framework (NPF4).

We offer the following comments on behalf of Historic Environment Scotland which is the lead public body set up to investigate, care for and promote Scotland's historic environment. We are responsible for leading and enabling the delivery of Scotland's historic environment strategy, [Our Place in Time](#) (2014) and our priorities are set out in our corporate plan, Heritage for All (2019).

The preparation of all plans in Scotland should be considered through the policies and principles within the [Historic Environment Policy for Scotland](#) (HEPS). Of particular relevance to the NPF4 is Policy HEP3 which states that "Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment." Our following comments consider how the draft NPF4 performs against this overarching national policy for Scotland's historic environment.

We have also uploaded this response to the Scottish Parliament's Consultation Hub.

Background

Many of the issues identified in our response to both the [Call for Ideas](#) and [Position Statement](#) have been included in draft spatial strategy, and as potential policy changes. We are pleased to see this and appreciate that our advice so far has been helpful.

We are particularly pleased that the draft NPF4 recognises that the historic environment can help deliver some of the framework's wider aims for the climate emergency, the biodiversity crisis, and other aspects of the strategy. This is in addition to having value in contributing to better, greener places. This approach aligns strongly with our knowledge, understanding and aspirations for the historic environment. However, we believe NPF4 can go significantly further in recognising the outcomes that can be supported by the sustainable management of our historic environment. This could be achieved by recognising these connections within the universal policies and within other aspects of the framework where culture and heritage can make an important contribution to the purpose of planning.

We would be happy to provide further views to the committees scrutinising NPF4 and clarify any of the points we have made in this submission.

We can also provide evidence in the form of research currently underway or planned, and case studies that align with the delivery of the key outcomes. We look forward to providing further information and evidence to support the preparation of NPF4's delivery plan as it continues to develop.

Our views

We have set out our comments on some aspects of the draft NPF4 below, focussing on the spatial strategy (part 1) and the national planning policy handbook (part 3). These identify areas where heritage can add value and enable successful delivery of the framework. While we are still reviewing the draft NPF4 and its supporting documents, we have identified some of the key issues we support and the areas where we consider further work is needed.

Interaction with other Scottish Government strategies and targets

We welcome the intention for NPF4 to maintain, strengthen and clarify existing historic environment policies, and align these with both [Our Place in Time](#) and the [Historic Environment Policy for Scotland](#) (HEPS). We also welcome the Scottish Government's approach to engaging communities and stakeholders on the development of NPF4 since the enactment of the Planning (Scotland) Act 2019 and their commitment for further engagement on the framework as part of its delivery.

While the draft NPF4 goes some way to align with both the national strategy for the historic environment and HEPS, we have highlighted in response to other questions areas where this could be strengthened. Overall, we would encourage Scottish Government to go further in taking a more holistic view of the environment and recognise that the sustainable management and protection of our natural and cultural heritage is heavily dependent on one another. When approached in this way the opportunities to deliver multiple benefits are significantly greater.

Priorities for the historic environment and whether NPF4 will deliver this

Good management of the historic environment and its component parts (including designated and undesignated heritage assets) is central to the delivery of economic, social, environmental and wellbeing outcomes, especially through place-based planning and action. We are keen to continue working with Scottish Government and other partners to make sure that the NPF4 is aligned with HEPS and will lead to development that will achieve the framework's key outcomes.

NPF4 – Spatial Strategy (Part 1)

We support the **spatial strategy** expressed in Part 1 of the framework and the strong focus upon creating sustainable, liveable, productive and distinctive places. We note that outcomes for the historic environment are very clearly set out under the Distinctive Places theme and welcome this. However, we would have expected some recognition of how our heritage and culture can support outcomes for sustainable and liveable places. This is recognised to some extent when looking at the Sustainable and Liveable Places policies within Part 3, however we believe these links can be strengthened further.

Making best use of existing buildings, infrastructure and places already plays a key part in Sustainable Living. At Historic Environment Scotland (HES), we champion the reuse of our historic assets for the benefits this can bring for communities across Scotland. Reusing what we already have promotes energy efficiency and is a key component of the Circular Economy and Sustainable Living. Buildings contribute to emissions throughout their whole lives: when we build, maintain, use and demolish them. Maintaining existing buildings is greener than building new and will be crucial for Scotland's net-zero targets.

Making best use of what we already have also helps maintain the unique historic character of our rural areas, villages, towns and cities. Repairing, restoring and reusing historic assets does this in a sustainable way. Heritage-led regeneration can also drive investment, jobs and tourism, leading to happier, healthier communities with a strong sense of local identity.

Much can also be learned about sustainable patterns of development from the historic environment. The siting and placement of historic places often has a strong relationship to landscape features; traditional buildings and materials have been designed to address their local climate. Older homes are often designed to fit a specific environment. Features like steep roof pitches and deep window and door rebates help to protect against cold, wind and rain. Space standards in traditional buildings often give good light levels and ventilation.

In light of this we believe the values and outcomes that can be realised through our culture and heritage should not be viewed as confined to the creation and management of Distinctive Places.

We also have some uncertainty around how Part 1 of the framework will feature in decision-making. Our understanding is that, unlike Part 3 of the framework, this sets the context for the spatial strategy and it will not be applied directly in a decision-making context.

NPF4 – National Developments (Part 2)

The draft NPF4 is accompanied by significant supporting material, much of which helps to tell the story of how the numerous candidate **National Developments** have been considered. We welcome the open and transparent approach that has been taken to the generation and consideration of these developments, including the significant work that has gone into undertaking the integrated impact assessment.

We are still in the process of reviewing the proposed National Developments and their alternatives and cannot provide detailed views on these at this stage. However, we would note that the introductory text for this section of the document is less clear than its predecessor (NPF3). Further clarification should be given on the importance of additional assessments and consenting processes for the National Developments. This would be particularly helpful where these relates to groups of potential developments rather than a specific or defined proposal e.g. ND12 – strategic renewable energy development and transmission infrastructure.

National Planning Policy Handbook (Part 3)

Universal Policies (policies 1-6)

We support the inclusion of the **universal policies** which we understand build on the existing Principles and Policies contained within Scottish Planning Policy and seek to identify the key cross-cutting issues that will affect all planning decisions. However, it is unclear how these policies relate to subsequent policies and whether any relative weighting applies. If this is the case, guidance on the relative weighting attached to these will need to be provided to minimise conflict in their application in combination with subsequent policies detailed throughout part 3 of the framework. Clarity and certainty on these issues will be critical for all stakeholders in the planning process – including communities and the public.

We particularly welcome the restated commitment to a **plan-led approach**, that significant weight should be given to the **climate emergency** and the importance of tackling the **biodiversity crisis**. However, we think that there is scope to include the historic environment more fully in these policies, and to recognise the contribution it makes to tackling the climate emergency and nature crisis. We would also welcome a plan-led approach to some of the policy areas included in the plan. For example, we would support a plan-led approach to the deployment of green energy

developments. This would allow for a more proactive and more collaborative approach to identifying suitable areas for development than the current market-led approach.

The Committee has identified a key question around potential conflict between outcomes and how these will be managed. The application of these universal policies is where the greatest potential for conflict may arise and it would be helpful for further guidance on this to be provided as part of the delivery plan.

The new policy on **human rights and equality** helpfully reflects the discussions that took place during the passage of the Planning (Scotland) Act 2019 where the need to encourage and enable engagement with planning received significant attention. We also welcome the clear expectation for planning authorities, applicants, key agencies and communities to consult and engage other collaboratively, meaningfully and proportionately. We are committed to working in this way and would draw the committee's attention to the work of the Key Agencies Group as part of our [Green Recovery initiative](#) as an example of this action.

We are pleased to see the inclusion of a new policy for **community wealth building** amongst the universal policies and the commitment to taking a people-centred approach to local economic development. There are many opportunities for community wealth building objectives to be realised through the sustainable and collaborative management of historic environment assets and places and we are keen to assist with the delivery of this aspect.

Finally, we welcome and support the policy for **design, quality and place**, including the **six qualities of successful places**, which we believe establish a helpful framework for testing whether proposals meet our aspirations for high quality development. We also welcome that the policy now actively calls for poorly designed development to not be supported. It is also encouraging to see a continued recognition of the value that can be added by design tools such as Masterplans, Development briefs and Design and Access Statements.

Historic Assets and Places (policy 28)

In our submission on the Position Statement we advised that the development management policies relating to the management of the **historic assets and places** (Part 3, Policy 28) need to be sufficiently detailed to support good plan and decision-making and give clarity to those who will be applying these in a variety of contexts. We also advised that these should reflect the value of heritage in its own right, as well as recognise that it is an enabler across principal policy areas including in the policies for sustainable, liveable and productive places where relevant.

While we believe this has largely been achieved in policy 28 for Historic Assets and Places, we have identified some opportunities for these to be refined and we will be providing feedback on these to Scottish Government in due course. We have similarly identified some areas where policies under the sustainable, liveable and

productive places sections can be enhanced to account for the historic environment. For example, the policy for Liveable Places (7) does not recognise the contribution of historic assets, places and infrastructure to the concept of 20 minute neighbourhoods. Like our natural spaces, our historic assets and places do and can play a key role in supporting healthier and flourishing communities.

We also hope that the further refinement of these policies and others throughout Part 3 will be influenced by those with significant experience in working with these in the consenting process. This includes, community groups with an interest in how their historic environment is managed, other key agencies, planning authorities and their archaeological and conservation advisors and the development community.

Green Energy (policy 19)

Whilst we note and welcome the strong protection that the policies for the historic assets and places as set out in policy 28 would be likely to give, conflicts with other policy areas including those which are likely to be essential in tackling both the climate emergency and the nature crisis are likely to arise as a consequence. For example, policy 19 sets out a positive policy direction for **green energy** which may conflict with the aims of policy 28.

In order to minimise such a conflict of aims, it will be essential for Scottish Ministers to give direction on the importance of the characteristics that should be taken into account in the siting and design of renewable energy developments. We consider that a plan-led approach to green energy developments would be a more helpful approach. This should be supported by a direction to planning authorities and developers to collaborate with communities and the [Key Agencies](#) to ensure that such developments are sustainable in line with the requirements of Policy 1.

Delivering Our Spatial Strategy (Part 4)

The success of NPF4 and wider [Transforming Planning Implementation Programme](#) will depend on the effective collaboration of a range of stakeholders and we are committed to playing our part.

It is crucial that planning authorities are well resourced to deliver the aims of the place-based approaches set out in the NPF4. The [Key Agencies Group](#) is currently developing and delivering a new [cross-agency approach to placemaking](#). This can help to support the delivery of complex or largescale developments and can help to build in environmental solutions and placemaking principles from the outset. Greater collaboration and partnership working approaches such as this will be required to deliver the NPF4 outcomes. We recommend such approaches form a fundamental part of any delivery strategy.

We note the intention that the increased resources required by planning authorities to implement the ambitions of NPF4 will be financed by increased planning fees. While we support the increased resourcing of planning authorities, we wish to

highlight that this will not benefit agencies and statutory consultees. Key Agencies such as HES potentially have a key role in supporting, leading and delivering elements of the place-based approaches set out in NPF4 but are currently experiencing serious resourcing challenges.

Conflicts between outcomes and how these conflicts will be managed

We welcome the attempts throughout NPF4 to recognise where there are synergies between various policy outcomes. This includes the strong connections between nature-based solutions and the stewardship of our historic environment and how we reuse and adapt existing infrastructure and the outcomes that this can support for climate adaptation. We believe that there is further scope to strengthen these connections, including the interconnection of landscape and the historic environment in defining the character and interest of rural and urban places and how this is valued in considering their sustainable futures.

We are mindful of the importance for NPF4 to be read holistically and we recognise that there will inevitably be conflict between some policy areas. We have given the example of where the relationship between the management of Historic Assets and Places may come into conflict with those for Green Energy, and there will be other areas where decision-makers will need to manage and balance a range of what can be conflicting outcomes. Key to minimising such conflict will be meeting the policy intentions set out under policy 4, which acknowledges the need for engagement to be early, collaborative, meaningful and proportionate, with careful consideration given to support or concerns expressed where they are material to the decision.

We hope this is helpful. We are keen to work with all stakeholders to ensure that the historic environment plays a crucial role in the further development and ultimate delivery of the key outcomes as set out in NPF4. We would also be happy to assist the committees further as they scrutinise NPF4 both now and when it returns to the Scottish Parliament later this year.

If you would like to discuss this or any of our comments in more detail, please contact Ann MacSween on 0131 668 8778 or ann.macsween@hes.scot.

Yours faithfully

Elizabeth McCrone
Director of Heritage