

Local Government and Communities Directorate,
The Scottish Government,
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Edinburgh,
EH6 6QQ

National Museums Scotland
Chambers Street
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Scottish Charity No. SC 010440

28 March 2022

Dear Local Government and Communities Directorate,

Scotland 2045 – NPF4

The Society of Antiquaries of Scotland is a national independent membership charity with over 2,800 members (Fellows) across the globe (for more information please see www.socantscot.org). Our interests in the draft NPF4 are mainly heritage related and we have confined our responses to address those issues. The Society recognises the various and often competing pressures on planning decision-makers across Scotland and we welcome the Scottish Government's efforts to develop a place-based spatial strategy to allow more efficient and productive use of our resources to ensure a healthy and vibrant country.

Consultation Responses

Q 1: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE NET ZERO PLACES WHICH WILL BE MORE RESILIENT TO THE IMPACTS OF CLIMATE CHANGE AND SUPPORT RECOVERY OF OUR NATURAL ENVIRONMENT?

We support the approach to encourage low- and zero-carbon design and energy efficiency and would highlight the maintenance and re-use of existing buildings as key to achieving this goal. One fifth of dwellings are almost 100 years old and contain embodied energy. Re-use and maintenance of this existing building stock is critical to reducing carbon emissions and mitigating the impacts of climate change.

The aim to reduce the need to travel unsustainably will have impacts on some tourism, and we need to build that into our future vision for Scotland's historic environment which forms, alongside our beautiful man-made landscapes, a key attraction for visitors.

The diversification and especially the expansion of renewable energy generation will need to take into account especially policy 28 in NPF4. We would highlight that evidence shows that the historic environment plays a valuable role in improving health, wellbeing, resilience and jobs, and should be aligned with nature capital in this section. Sustainable design and use of resources, including circular economy approaches to construction and development will also include our historic places, which provide the majority of our embedded carbon and resources for re-use.

Q 2: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES, HOMES AND NEIGHBOURHOODS WHICH WILL BE BETTER, HEALTHIER AND MORE VIBRANT PLACES TO LIVE?

We welcome the reference to making better use of our spaces to support physical activity, relaxation and play, to bring people together and to celebrate our culture, diversity and heritage. The historic environment has an important role to play in this. People who visited a historic or archaeological place are over 50% more likely to report a high life satisfaction than those who did not visit. 89% of adults strongly agreed or agreed "it is important to me that heritage buildings, monuments and places are well looked after".

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Q 3: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES WHICH WILL ATTRACT NEW INVESTMENT, BUILD BUSINESS CONFIDENCE, STIMULATE ENTREPRENEURSHIP AND FACILITATE FUTURE WAYS OF WORKING – IMPROVING ECONOMIC, SOCIAL AND ENVIRONMENTAL WELLBEING?

We look forward to seeing how Scotland’s heritage can contribute to the National Strategy for Economic Transformation when published. Our historic environment already contributes in excess of £2.3 billion to Scotland’s economy, with £2.9 billion in gross value added in 2017. The economic value of volunteers in the sector has recently been measured at £14.7 million.

Q 4: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES WHICH WILL BE DISTINCTIVE, SAFE AND PLEASANT, EASY TO MOVE AROUND, WELCOMING, NATURE-POSITIVE AND RESOURCE EFFICIENT?

The Society agrees wholeheartedly with the statement that Scotland has a rich and high quality natural and historic environment. The national strategy for the historic environment *Our Place in Time* aligns directly with the stated strategy to value, enhance, conserve and celebrate our best places, and we will work with Scottish Government and other actors to ensure that our heritage strategy continues to adapt and address issues of inequality and climate change both on and offshore. It should be noted however, that the delivery of distinctive places will require appropriate adaptation and management not just protection and safeguarding.

Q 5: DO YOU AGREE THAT THE SPATIAL STRATEGY WILL DELIVER FUTURE PLACES THAT OVERALL ARE SUSTAINABLE, LIVEABLE, PRODUCTIVE AND DISTINCTIVE?

There are some excellent aspirations in the spatial strategy – we would advise that Scotland should take these forward with both the natural and historic environment considered together throughout.

Q 6: DO YOU AGREE THAT THESE SPATIAL PRINCIPLES WILL ENABLE THE RIGHT CHOICES TO BE MADE ABOUT WHERE DEVELOPMENT SHOULD BE LOCATED?

The Society notes that to deliver compact growth brownfield, vacant and derelict land will be precisely the areas that will hold heritage information that can both inform about our past and enhance these locations as distinctive places. Recognition of the need to ensure appropriate investigation of and reporting on these places will be critical to ensuring they deliver sustainability.

Conserving and recycling assets is a welcome principle that recognises the importance of embedded carbon and resources in existing buildings and places. Again these will also provide opportunities to enhance our understanding of Scotland’s past and the public benefits that can be derived from the historic environment. However, the ambition to deliver a just transition and balanced development, could come into conflict with investing in nationally significant sites with existing infrastructure, this will simply amplify resource expenditure at “honey pot” locations to the detriment of delivering better connectivity and sustainable assets across the country.

Urban and rural synergy should also include connecting people with heritage as well as nature – they will both deliver benefits, and in tandem can exponentially enhance resilience.

Q 7: DO YOU AGREE THAT THESE SPATIAL STRATEGY ACTION AREAS PROVIDE A STRONG BASIS TO TAKE FORWARD REGIONAL PRIORITY ACTIONS?

While we would certainly recognise and support the aim to make the most of the exceptional natural and cultural heritage in the northern area, a very similar argument could and should be made for utilising the natural and cultural heritage of the north and west and southern areas too. Cultural heritage here should be defined to include the historic environment. It must also be recognised that “making the most of exceptional natural and cultural heritage” will be aimed primarily at increasing tourism, and this will inevitably come into conflict with aspirations for a net zero carbon economy. This issue needs to be openly addressed and solutions or at least mitigation actions provided in NPF4.

Q 8: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

This is a reasonable summary of the present situation, but it will soon go out of date across the 23 years to 2045 and will require regular updating.

Q 9: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

This section could be perceived as limiting the innovation of new enterprises to help deliver against some of the challenges because it references specific already existing programmes.

Q 10: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

See answer to Q8

Q 11: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

There are fewer referenced projects, which indicates itself there is likely a significant underinvestment in this area which requires urgent prioritisation. However, it also presents a model for other sections to reduce the referencing of specific projects to allow greater innovation and flexibility to address some of the challenges.

Q 12: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

See answer to Q8

Q 13: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

While the area’s “excellent quality” of heritage is mentioned, this should translate across to action to enhance and build on this asset for both the transition to net zero and people’s wellbeing generally and local liveability of rural areas specifically.

Q 14: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

See answer to Q8

Q 15: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

The Society is pleased to see recognition of the excellent heritage assets across Scotland's urban areas which will prove critical to sustaining city centres, developing urban fringes and coastal regeneration for example. A lot of the actions here will need careful balance between new build and existing assets, recognising the latter as essential to reaching a net zero target; there is a potential inherent conflict between 16 and 17 for example. Re-use, refurbishment and retrofitting of existing buildings should headline the solution to urban transformation.

Q 16: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

See answer to Q8

Q 17: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

Again, while the area's "rich cultural heritage" is recognised, this doesn't translate into actions. A key aspect of local towns in this area is their distinctive heritage, and many have key historic environment assets that should be included in, for example, sustainable development and certainly should be added to no 24 *Sustaining and Enhancing Natural Capital*.

Q 18: WHAT ARE YOUR OVERALL VIEWS ON THIS PROPOSED NATIONAL SPATIAL STRATEGY?

Overall, this section appears long and as noted will soon go out of date because it references specific projects which will complete within the timespan of the NPF, which might also have the unintended consequence of discouraging innovative new solutions to the challenges presented. A lot of this section could be summarised, and the examples of actions being undertaken through specific projects provided in an Appendix. Finally, the Northern Area and the Southern Area sections are both significantly smaller, reinforcing the perception of a lack of investment in these areas.

Q 19: DO YOU THINK THAT ANY OF THE CLASSES OF DEVELOPMENT DESCRIBED IN THE STATEMENTS OF NEED SHOULD BE CHANGED OR ADDITIONAL CLASSES ADDED IN ORDER TO DELIVER THE NATIONAL DEVELOPMENT DESCRIBED?

The Society has no comment on the classes of development but is interested to explore the opportunities for traditional skills and other heritage skills in the development of 5. *Circular Economy Material Management Facilities*, and the integration of the historic environment and heritage skills in 14. *Clyde Mission*.

Q 20: IS THE LEVEL OF INFORMATION IN THE STATEMENTS OF NEED ENOUGH FOR COMMUNITIES, APPLICANTS AND PLANNING AUTHORITIES TO CLEARLY DECIDE WHEN A PROPOSAL SHOULD BE HANDLED AS A NATIONAL DEVELOPMENT?

No - it is suggested that further information could be provided through up-to-date websites for each, facilitated through a central portal.

Q 21: DO YOU THINK THERE ARE OTHER DEVELOPMENTS, NOT ALREADY CONSIDERED IN SUPPORTING DOCUMENTS, THAT SHOULD BE CONSIDERED FOR NATIONAL DEVELOPMENT STATUS?

Yes - the long-term assessment and solutions to the issue of maintenance and conservation of our historic environment assets, especially (but not limited to) sites currently considered of national importance, could be usefully considered for National Development status.

Q 22: DO YOU AGREE THAT ADDRESSING CLIMATE CHANGE AND NATURE RECOVERY SHOULD BE THE PRIMARY GUIDING PRINCIPLES FOR ALL OUR PLANS AND PLANNING DECISIONS?

Yes in part - but the important contribution that the historic and existing built environment make towards climate solutions must not be forgotten and is felt to be underrepresented.

Policy 1: Plan-led approach to sustainable development

Q 23: DO YOU AGREE WITH THIS POLICY APPROACH?

Yes – it would also be appropriate for the Place Principle to be referenced here.

Policy 2: Climate emergency

Q 24: DO YOU AGREE THAT THIS POLICY WILL ENSURE THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE CLIMATE EMERGENCY?

Yes – embodied carbon and energy should also be referenced here. This would be an appropriate location to restate the primacy of re-use, refurbishment and retrofitting; none of which appear to be explicitly referenced.

Policy 3: Nature crisis

Q 25: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE NATURE CRISIS?

Yes – this policy could be expanded to *Nature crisis and our historic environment*, since the same principles of enhancement, protection and conservation will be applied to both.

Policy 4: Human rights and equality

Q 26: DO YOU AGREE THAT THIS POLICY EFFECTIVELY ADDRESSES THE NEED FOR PLANNING TO RESPECT, PROTECT AND FULFIL HUMAN RIGHTS, SEEK TO ELIMINATE DISCRIMINATION AND PROMOTE EQUALITY?

Yes partially - we would also agree with the BEFS response that “BEFS Queries the meaning of ‘proportionality’ within this context, examples to illustrate may be beneficial. Additionally, the phrasing ‘careful consideration’ can lack the necessary teeth as a policy for more complex decision making.”

Policy 5: Community wealth building

Q 27: DO YOU AGREE THAT PLANNING POLICY SHOULD SUPPORT COMMUNITY WEALTH BUILDING, AND DOES THIS POLICY DELIVER THIS?

Yes partially – we would support the BEFS query, “Do communities need to be resourced to be able to do this?”

Policy 6: Design, quality and place

Q 28: DO YOU AGREE THAT THIS POLICY WILL ENABLE THE PLANNING SYSTEM TO PROMOTE DESIGN, QUALITY AND PLACE?

Yes – the Society welcomes the recognition of heritage and historic environment in the six qualities of successful places and would suggest the historic environment can also promote health and wellbeing and could be incorporated into *Quality 1. Designed for lifelong health*

and wellbeing: for example with the addition of “...and a nature-rich and heritage-rich local environment...”.

Policy 7: Local living

Q 29: DO YOU AGREE THAT THIS POLICY SUFFICIENTLY ADDRESSES THE NEED TO SUPPORT LOCAL LIVING?

Yes

Policy 8: Infrastructure First

Q 30: DO YOU AGREE THAT THIS POLICY ENSURES THAT WE MAKE BEST USE OF EXISTING INFRASTRUCTURE AND TAKE AN INFRASTRUCTURE-FIRST APPROACH TO PLANNING?

Yes partially – we would support the response from BEFS: “Current housing and existing buildings are not recognised as part of infrastructure here, as is part of the Infrastructure Commission recommendations. Would welcome clearer alignment to Infrastructure Investment Plan recommendations on existing housing, specifically ‘enhancing and maintaining existing assets ahead of new build’”

Policy 9: Quality homes

Q 31: DO YOU AGREE THAT THIS POLICY MEETS THE AIMS OF SUPPORTING THE DELIVERY OF HIGH QUALITY, SUSTAINABLE HOMES THAT MEET THE NEEDS OF PEOPLE THROUGHOUT THEIR LIVES?

Partially - this policy emphasises new build developments, and some reiteration of and support for quality in re-use of existing property should be included (beyond *j. Householder development*).

The statement of community benefit does not include involvement from the community.

Policy 10: Sustainable transport

Q 32: DO YOU AGREE THAT THIS POLICY WILL REDUCE THE NEED TO TRAVEL UNSUSTAINABLY, DECARBONISE OUR TRANSPORT SYSTEM AND PROMOTE ACTIVE TRAVEL CHOICES?

Yes

Policy 11: Heat and cooling

Q 33: DO YOU AGREE THAT THIS POLICY WILL HELP US ACHIEVE ZERO EMISSIONS FROM HEATING AND COOLING OUR BUILDINGS AND ADAPT TO CHANGING TEMPERATURES?

Partially - this policy appears geared towards large-scale heating and cooling, and some reference to individual building policies and strategies should be made here.

Policy 12: Blue and green infrastructure, play and sport

Q 34: DO YOU AGREE THAT THIS POLICY WILL HELP TO MAKE OUR PLACES GREENER, HEALTHIER, AND MORE RESILIENT TO CLIMATE CHANGE BY SUPPORTING AND ENHANCING BLUE AND GREEN INFRASTRUCTURE AND PROVIDING GOOD QUALITY LOCAL OPPORTUNITIES FOR PLAY AND SPORT?

Partially - blue and green infrastructure should also include historic environment assets, such as designed landscapes for example, as providing the same wide range of public benefits.

Reference to recreation is made in the text but should also be added to the headline (*Play, Sport and Recreation*).

Part d could usefully reference compatibility with the historic environment in relation to regional and country parks.

Policy 13: Sustainable flood risk and water management

Q 35: DO YOU AGREE THAT THIS POLICY WILL HELP TO ENSURE PLACES ARE RESILIENT TO FUTURE FLOOD RISK AND MAKE EFFICIENT AND SUSTAINABLE USE OF WATER RESOURCES?

Yes

Policies 14 and 15: Health, wellbeing and safety

Q 36: DO YOU AGREE THAT THIS POLICY WILL ENSURE PLACES SUPPORT HEALTH, WELLBEING AND SAFETY, AND STRENGTHEN THE RESILIENCE OF COMMUNITIES.

Partially – we support the BEFS response that “14 Part E) is considered to be too broad with potential unintended consequences. For example, a worst-case scenario could be an unsuitable development being suggested, which does have space for local food growing – and using this policy as a justification. Perhaps “consideration should be given” to development proposals including such measures.”

Policy 16: Land and premises for business and employment

Q 37: DO YOU AGREE THAT THIS POLICY ENSURES PLACES SUPPORT NEW AND EXPANDED BUSINESSES AND INVESTMENT, STIMULATE ENTREPRENEURSHIP AND PROMOTE ALTERNATIVE WAYS OF WORKING IN ORDER TO ACHIEVE A GREEN RECOVERY AND BUILD A WELLBEING ECONOMY?

Yes - with a welcome reference to historic environment in part g.

Policy 17: Sustainable tourism

Q 38: DO YOU AGREE THAT THIS POLICY WILL HELP TO INSPIRE PEOPLE TO VISIT SCOTLAND, AND SUPPORT SUSTAINABLE TOURISM WHICH BENEFITS LOCAL PEOPLE AND IS CONSISTENT WITH OUR NET-ZERO AND NATURE COMMITMENTS?

Partially - cultural assets here should explicitly include historic environment assets and the definition of “environment” as used within Part C) should be expanded so that it specifically references both the natural and historic environment.

Is there a definition of “tourist facilities”?

Policy 18: Culture and creativity

Q 39: DO YOU AGREE THAT THIS POLICY SUPPORTS OUR PLACES TO REFLECT AND FACILITATE ENJOYMENT OF, AND INVESTMENT IN, OUR COLLECTIVE CULTURE AND CREATIVITY?

Partially - we welcome inclusion of heritage in part 1, and the Society would welcome some consideration of whether a historic environment venue should be included in d and the final bullet point of d could usefully include loss or damage to assets of significant heritage value. While heritage significance is reasonably well defined through policy (e.g. *Historic Environment Policy for Scotland*), how is cultural significance defined?

Policy 19: Green energy

Q 40: DO YOU AGREE THAT THIS POLICY WILL ENSURE OUR PLACES SUPPORT CONTINUED EXPANSION OF LOW CARBON AND NET-ZERO ENERGY TECHNOLOGIES AS A KEY CONTRIBUTOR TO NET-ZERO EMISSIONS BY 2045?

Yes - we particularly welcome the reference to historic environment assets in part k.

Policy 20: Zero waste

Q 41: DO YOU AGREE THAT THIS POLICY WILL HELP OUR PLACES TO BE MORE RESOURCE EFFICIENT, AND TO BE SUPPORTED BY SERVICES AND FACILITIES THAT HELP TO ACHIEVE A CIRCULAR ECONOMY?

Yes - we welcome the reference to reuse, salvage and minimising demolition, and the reference to historic environment assets in part e.

Policy 21: Aquaculture

Q 42: DO YOU AGREE THAT THIS POLICY WILL SUPPORT INVESTMENT IN AQUACULTURE AND MINIMISE ITS POTENTIAL IMPACTS ON THE ENVIRONMENT?

Yes - assuming that Regional and National Marine Plans incorporate Historic Marine Protection Areas (MPAs).

Policy 22: Minerals

Q 43: DO YOU AGREE THAT THIS POLICY WILL SUPPORT THE SUSTAINABLE MANAGEMENT OF RESOURCES AND MINIMISE THE IMPACTS OF EXTRACTION OF MINERALS ON COMMUNITIES AND THE ENVIRONMENT?

Yes - we welcome the reference to conservation value in part a, and historic environment in part d.

Policy 23: Digital infrastructure

Q 44: DO YOU AGREE THAT THIS POLICY ENSURES ALL OF OUR PLACES WILL BE DIGITALLY CONNECTED?

Yes

Policies 24 to 27: Distinctive places

Q 45: DO YOU AGREE THAT THESE POLICIES WILL ENSURE SCOTLAND'S PLACES WILL SUPPORT LOW CARBON URBAN LIVING?

Partially - some reference to green space and heritage should be incorporated here, recognising the natural and historic environment as inherently beneficial aspects of existing places.

Policy 28: Historic assets and places

Q 46: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND ENHANCE OUR HISTORIC ENVIRONMENT, AND SUPPORT THE RE-USE OF REDUNDANT OR NEGLECTED HISTORIC BUILDINGS?

Partially - this policy is where we would expect to see the contents of *Scottish Planning Policy: Valuing the Historic Environment* reflected, and several key documents referenced there are missing here, for example *Planning Advice Note 2/2011: Planning and Archaeology*, which helps clarify processes for working with historic environment assets in the planning process. If this advice is not to be referenced there must be clarity that this will be urgently included in the *Managing Change Guidance Notes* published by Historic

Environment Scotland which are referenced. The Society would also highlight that these latter documents, while valuable, at present address the needs of Historic Environment Scotland in dealing with designated remains and would require enhancement to provide adequate advice on the processes and issues encountered with undesignated historic environment assets.

In addition SPP directly states the need for Local Authorities to have access to Historic Environment Records that contain the necessary information for successful decision-making. The reference to the *Buildings At Risk Register* (BARR) suggests that reference should also be made to Historic Environment Records. In addition, if to be referenced in NPF4 Scottish Government will need to ensure that the BARR adequately identifies properties across the spectrum of Scottish places and doesn't inadvertently drive investment to specific locations to the detriment of others. This would hold back any intention to ensure resources and investment are directed where most needed to enable a Just Transition improving equality and eliminating discrimination.

Part a talks about locally, regionally, nationally and internationally important assets, which is good in principle but does not align with current designation descriptions in law.

Part b states only projects "with a potentially significant impact" on historic environment assets or places would require further and more detailed assessment. Who makes the decision as to what might be significant in this context without the initial assessment to determine potential impact? This should read "with potential to impact".

The Society supports the BEFS response to Part g which sets a principle that not only supports retaining local character and a sense of place, but also contributes to the sustainable development of a location. We agree that "it would be beneficial not to limit such requirements to just conservation areas, but instead have them apply to all developments."

Part j should mirror the policy in part i ensuring development "should only be supported where they protect, preserve and enhance such places and do not impact adversely upon the cultural significance, character and integrity of the site; nor upon important views to, from and within them; nor upon the setting of component features which contribute to the battlefield landscape and their historical, cultural and archaeological interest."

Part k should include reference to the wider historic environment assets offshore which are not currently designated as Historic MPAs. In essence planning practice offshore should not differ from that onshore.

Part o should include reference to "public benefit" in the list of steps to be undertaken if a site cannot be retained. This will enable opportunities for outreach to interpretation and helps to deliver the added social value requirements of development. The mitigation referenced in Part o, while echoing elements of the existing SPP, fails to address desk-based assessment, heritage statements, surveys, environmental sampling, conservation, historic building recording, evaluations and watching-briefs (some of these might be considered to be covered by the term 'recording', in which case a definition of this needs to be included in the glossary). The process of determining impacts is not referenced, again this might appear in more detailed supplementary guidance such as *Planning Advice Note 2/2011: Planning and Archaeology*.

Part p requires clarification to state: "When archaeological discoveries are made in the course of development works which have no agreed archaeological mitigation strategy already in place, they must be reported to the planning authority to enable discussion on appropriate inspection, recording and mitigation measures." This will ensure compliance with the legal requirements of Bona Vacantia and the Right of Sepulchre and prevent the loss of valuable information about our past.

In general the Society welcomes this policy with the caveats noted above, recognising that the inclusion of SPP into NPF4 will inevitably require brevity. Careful phrasing is required to reflect reality of practice, for example use of ‘unacceptable negative impacts’ rather than ‘no adverse affects’.

The use of supporting documentation is welcomed, but the Society is keen to know the future status of *Planning Advice Note 2/2011: Planning and Archaeology* on publication of *Scotland 2045*.

Policy 29: Urban edges and the green belt

Q 47: DO YOU AGREE THAT THIS POLICY WILL INCREASE THE DENSITY OF OUR SETTLEMENTS, RESTORE NATURE AND PROMOTE LOCAL LIVING BY LIMITING URBAN EXPANSION AND USING THE LAND AROUND OUR TOWNS AND CITIES WISELY?

Yes - we welcome the inclusion of the requirement to safeguard historic environment assets in part c.

Policy 30: Vacant and derelict land

Q 48: DO YOU AGREE THAT THIS POLICY WILL HELP TO PROACTIVELY ENABLE THE REUSE OF VACANT AND DERELICT LAND AND BUILDINGS?

Yes - we would note that vacant and derelict land and redundant buildings are likely to hold information about Scotland’s past that can add value to the distinctiveness of place and provide other benefits. We particularly welcome part e to support the circular economy.

Policy 31: Rural places

Q 49: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT RURAL PLACES CAN BE VIBRANT AND SUSTAINABLE?

Partially - and we especially welcome the references to historic environment in this policy although the Society would add that previously inhabited places will contain a wealth of information about Scotland’s past and that any redevelopment should follow policy 28.

Further, part d could include reference to historic environment in the last bullet point to read “improvement or restoration of the natural or historic environment.”

Why is the term “cultural heritage asset” used in part e rather than the usual “historic environment asset” used elsewhere in this policy?

Policy 32: Natural places

Q 50: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND RESTORE NATURAL PLACES?

Yes - we would add that the precautionary principle should also apply to our historic environment.

Policy 33: Peat and carbon rich soils

Q 51: DO YOU AGREE THAT THIS POLICY PROTECTS CARBON RICH SOILS AND SUPPORTS THE PRESERVATION AND RESTORATION OF PEATLANDS?

Partially - although we would add that peatlands especially have the potential to preserve unique evidence of Scotland’s past, and any extraction should consider something along the lines of part p in Policy 28.

Policy 34: Trees, woodland and forestry

Q 52: DO YOU AGREE THAT THIS POLICY WILL EXPAND WOODLAND COVER AND PROTECT EXISTING WOODLAND?

Partially - there should be reference here to ensuring initial assessment and appropriate mitigation where development might impact upon historic environment assets.

Policy 35: Coasts

Q 53: DO YOU AGREE THAT THIS POLICY WILL HELP OUR COASTAL AREAS ADAPT TO CLIMATE CHANGE AND SUPPORT THE SUSTAINABLE DEVELOPMENT OF COASTAL COMMUNITIES?

Partially - coastal areas are often rich in heritage, and the framework for protecting assets should also consider the public benefit such cultural heritage can provide, including opportunities for heritage-based solutions to improve community resilience.

Q 54: DO YOU AGREE WITH OUR PROPOSED PRIORITIES FOR THE DELIVERY OF THE SPATIAL STRATEGY?

Partially – it will need to be clearly articulated that Growth Deals must be aligned with spatial strategies given their different origins from UK and Scottish Governments respectively.

Q 55: DO YOU HAVE ANY OTHER COMMENTS ON THE DELIVERY OF THE SPATIAL STRATEGY?

It will be necessary to clearly state the position of *Planning Advice Note 2/2011 'Planning and Archaeology'* with regard to NPF4 and the *Managing Change* documents published by Historic Environment Scotland. If the PAN is to be removed, then an appropriate *Managing Change* document will need to be delivered as a priority.

Given they are a key resource for delivering many aspects of National Outcomes and supporting the tourism industry, traditional skills development, health and wellbeing and aspects of this spatial strategy in Scotland, the conservation of important heritage resources in Scotland should be actively considered as a proposed National Development. This will help to align public and private resources, place an emphasis on prioritisation and help to deliver public benefit at a national scale.

The Society notes the BEFS response that “BEFS is concerned that the ambitious and aspirational strategies and aims outlined in the draft document will be adopted without clarity on how they will be delivered. We would therefore emphasise that whilst this document relates to policies, these policies are not sufficient in and of themselves, and can only have a meaningful impact when they are adequately resourced, with leadership and action attached to them. We would further note that funding in current budget does not support the key role of planning and implementation.”

Q 56: DO YOU AGREE THAT THE DEVELOPMENT MEASURES IDENTIFIED WILL CONTRIBUTE TO EACH OF THE OUTCOMES IDENTIFIED IN SECTION 3A(3)(c) OF THE TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997?

No comment

Q 57: DO YOU AGREE WITH THE MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR) NUMBERS?

No comment

Q 58: DO YOU AGREE WITH THE DEFINITIONS SET OUT IN THE GLOSSARY? ARE THERE ANY OTHER TERMS IT WOULD BE USEFUL TO INCLUDE IN THE GLOSSARY?

Partially – there is a mixed use of terms throughout the document which require clarity with regard to the historic environment; the term “cultural heritage” (e.g. Rural Places and Six Qualities of Successful Places) should probably be either defined or replaced. “Historic assets” is also used, presumably as a short-hand for “historic environment assets” – but should probably be fully expanded to match the glossary term.

Is there a definition of “tourist facilities”?

Q 59: WHAT ARE YOUR VIEWS ON THE ACCURACY AND SCOPE OF THE ENVIRONMENTAL BASELINE SET OUT IN THE ENVIRONMENTAL REPORT?

No comment

Q 60: WHAT ARE YOUR VIEWS ON THE PREDICTED ENVIRONMENTAL EFFECTS OF THE DRAFT NPF4 AS SET OUT IN THE ENVIRONMENTAL REPORT? PLEASE GIVE DETAILS OF ANY ADDITIONAL RELEVANT SOURCES.

No comment

Q 61: WHAT ARE YOUR VIEWS ON THE POTENTIAL HEALTH EFFECTS OF THE PROPOSED NATIONAL DEVELOPMENTS AS SET OUT IN THE ENVIRONMENTAL REPORT?

No comment

Q 62: WHAT ARE YOUR VIEWS ON THE ASSESSMENT OF ALTERNATIVES AS SET OUT IN THE ENVIRONMENTAL REPORT?

No comment

Q 63: WHAT ARE YOUR VIEWS ON THE PROPOSALS FOR MITIGATION, ENHANCEMENT AND MONITORING OF THE ENVIRONMENTAL EFFECTS SET OUT IN THE ENVIRONMENTAL REPORT?

No comment

Q 64: WHAT ARE YOUR VIEWS ON THE EVIDENCE AND INFORMATION TO INFORM THE SOCIETY AND EQUALITIES IMPACT ASSESSMENT?

No comment

Q 65: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE EQUALITIES IMPACT ASSESSMENT?

No comment

Q 66: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE CHILDREN'S RIGHTS AND WELLBEING IMPACT ASSESSMENT?

No comment

Q 67: DO YOU HAVE ANY COMMENTS ON THE FAIRER SCOTLAND DUTY AND THE DRAFT NPF4?

No comment

Q 68: DO YOU HAVE ANY COMMENTS ON THE CONSIDERATION OF HUMAN RIGHTS AND THE DRAFT NPF4?

No comment

Q 69: DO YOU HAVE ANY COMMENTS ON THE ISLANDS IMPACT ASSESSMENT?

No comment

Q 70: DO YOU HAVE ANY COMMENTS ON THE PARTIAL BUSINESS AND REGULATORY IMPACT ASSESSMENT?

No comment

Summary

In general the Society welcomes this new National Planning Framework draft and its recognition of the value and benefits of the historic environment across multiple policies. We are happy to discuss any of these responses in more detail at any time.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Gilmour', with a stylized, cursive script.

Dr Simon Gilmour
Director (director@socantscot.org)