

HOPS Response to Historic Environment Scotland consultation for Scotland's new historic environment strategy (20th February 2023)

Information Note

Heads of Planning Scotland (HOPS) is the representative organisation for senior planning officers from Scotland's local authorities, national park authorities and strategic development planning authorities.

The purpose of HOPS is to:

- Promote the profile of public sector land use planning
- Support and promote excellence in planning leadership
- Ensure the delivery of a culture of continuous improvement in planning authorities
- Provide advocacy and coordination to ensure that planning authorities are properly resourced to deliver quality outcomes.

HOPS would like to thank all planning authorities for their contribution to this consultation response.

Introduction

4. Which areas of the historic environment sector is your organisation/ are you involved with? Please select all that apply.

(Required)

- Archaeology
- Archives or Collections
- Museums
- Community heritage
- Education, training and life-long learning
- Built Heritage, including historic buildings, monuments and industrial heritage sites
- Intangible Cultural Heritage, such as cultural traditions
- Natural heritage (including landscapes)
- Traditional building skills
- Traditional building materials

- Planning system
- Urban and rural development
- None
- Other (please specify below):

About You

5. Which of the following are you responding on behalf of? Please select one option only.

(Required)

Please select only one item

- Community or voluntary group supporting a specific heritage-based project
- Faith-based or church organisation
- Charity or third sector organisation with a heritage purpose (not for profit)
- Charity or third sector organisation (not for profit) outwith the heritage sector
- Social Enterprise / Community Interest Company / SCIO
- Sole trader or Partnership dealing in heritage products or services
- Private sector organisation in the historic environment sector
- Private individual with an interest in heritage
- Other (please specify below)

Representative organisation for senior planning officers from Scotland's local authorities, national park authorities and strategic development planning authorities.

6. Which areas do you or your organisation work in? Please select one. (Please tick not applicable if this question does not apply to you)

(Required)

Please select only one item

- Scotland local area only- e.g. you/your organisation operate within a local town/city/Island
- Scotland local authority only- e.g. you/your organisation operate within a local authority area
- Scotland regional only- e.g. you/your organisation are based in and/or operate within a broader region

- Scotland wide- e.g. you/your organisation are based in and/or operate across Scotland
- UK wide- e.g. you/your organisation are based in and/or operate nationally
- International- e.g. you/your organisation are based in and/or operate internationally
- Not applicable

Our shared mission and principles

14. Do you support this mission statement?

Please use the text box to explain what you like about it or what you would change. You do not have to choose a response option to comment in the text box.

This new document as it is proposed does not appear to contain a clear definition of the Historic Environment as exists in the current OPiT. The visions and aims of the strategy also do not make reference to the traditional focus on ‘protecting and enhancing’ the historic environment.

The newly-adopted NPF4 includes a policy titled ‘Historic assets and places’ which states the following:

“Policy Intent: To protect and enhance the historic environment assets and places, and to enable positive changes as a catalyst for the regeneration of places.

Policy Outcomes:

- The historic environment is valued, protected, and enhanced, supporting the transition to net zero and ensuring assets are resilient to current and future impacts of climate change.
- Redundant or neglected historic buildings are brought back into sustainable and productive uses.
- Recognise the social, environmental and economic value of the historic environment, to our economy and cultural identity.”¹

It is acknowledged that this goal underpins the work of HES and therefore is implicit throughout the whole document – however this could be stated more explicitly within the mission statement in order to bring this framework in line with national planning policy and by extension the work of planning authorities.

¹ National Planning Framework 4 – Revised Draft. Page 45.

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2022/11/national-planning-framework-4-revised-draft/documents/national-planning-framework-4-revised-draft/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4-revised-draft.pdf>

15. These are the six principles that have been identified in feedback from the engagement workshops. Do you agree with them?

Please use the text box to explain what you like about them or what you would change. You do not have to choose a response option to comment in the text box.

	Yes I agree	No I do not agree	Not sure
We must put people at the heart of this strategy <i>Please select only one item</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We must face the climate and biodiversity crises <i>Please select only one item</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We must care for, and protect, our heritage assets <i>Please select only one item</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We must work collaboratively across sectors <i>Please select only one item</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We must be prepared to make difficult decisions <i>Please select only one item</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
We must make inclusive and transparent decisions <i>Please select only one item</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please add any comments on principles here:

Principle 1: HOPS supports this aim but would welcome more clarity on what this means in practice beyond the stated aim of ‘putting people at the heart of decision-making’.

Principle 2: HOPS welcomes that this principle is in line with the strategic aims and policies of the newly adopted NPF4. This is a cross-cutting priority which is a consideration for every sector, not just the historic environment, which could be made clearer.

Principle 3 – As the representative body for planning officers, we would advise that this principle be expanded to have a more explicit reference to ‘understanding, caring for, protecting and enhancing’ the historic environment, as this would bring the principle more in line with planning policy (see answer to question 14).

Principle 4 – HOPS would note that collaborative working is already commonplace across the built environment sector and that we benefit from positive engagement with HES across our executive committee and sub-committees. HOPS welcome this principle but would seek more clarity on whether this brings any additional requirements in practice.

Principle 5 – Planning Officers are often faced with taking difficult decisions in relation to the Historic Environment and would therefore not shy away from this principle – however the strategy does not make clear in what context these difficult decisions may apply and what support or advice would be provided to planning officers and other professionals in making these decisions. We would advise that the wording of this principle should reflect the need to explore all potential options before making these difficult decisions, and that the management of such decisions is clear and transparent. There may therefore be value in merging this with principle 6 and introducing a priority relating to skills/upskilling, which will be key to taking the strategy forward.

Our priorities, outcomes and actions

16. We have identified three key priorities as the focus for delivery over the next five years. Do you agree with them?

Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

	Yes I agree with this	No I do not agree with this	Don't know
Enabling the transition to net zero <i>Please select only one item</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Empowering vibrant, resilient, and inclusive communities and places <i>Please select only one item</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building a wellbeing economy <i>Please select only one item</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please add any comments on priorities here:

HOPS in principle agree that all of the stated priorities are both important and timely. We would welcome more clarity in particular on the third goal of building a wellbeing economy and how the strategy will seek to contribute to this. We acknowledge that there is a need to for the strategy to focus on a limited number of high-level priorities, but would suggest that the three proposed perhaps do not reflect the breadth and depth of work that is carried out across the sector, much of which has very positive economic and social benefits.

We would reiterate that understanding, caring for, protecting and enhancing the historic environment should be a priority as these are the principles under which planning officers and others in the sector operate, and they have a recognition factor and level of understanding outside of the sector as well.

17. Each priority has a set of outcomes expressed as Key Performance Indicators (KPIs) associated with it. Do you agree with these KPIs?

Please use the text box to explain your answer. You do not have to choose a response option to comment.

If you have comments on the KPIs, including new or different measures that could be used, please comment below:

A number of the proposed KPIs place a not insignificant ask on planning authorities and we would caution that more discussion is perhaps needed on whether these are achievable in their current wording, against the backdrop of resourcing issues across the public sector. HOPS would welcome a meeting with HES to discuss this further.

HOPS are aware that “the formal success criteria for each outcome and its measure will be published in the final strategy” and would note that formal metrics for measuring the success/outcomes of each KPI would indeed strengthen the document (see question 20).

18 Under each KPI, we have set out the actions we might take at national level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

Please select only one item

- Yes I agree with these actions
- I suggest changes to one or more of the actions and/or have ideas for additional actions
- I do not agree with any of these actions

Comments:

As stated previously under question 17, a number of the proposed KPIs place a not insignificant ask on planning authorities and we would caution that more discussion is perhaps needed on whether these are achievable in their current wording, against the backdrop of resourcing issues across the public sector.

KPI 2 could be strengthened to encourage cross-working between local authorities, HES and Scottish Government to embed the historic environment within natural capital accounting. It is our understanding that both Public Health Scotland and NatureScot are looking at methodologies for natural capital accounting, and we would support a single approach being taken across Scotland.

On KPI 3, HOPS would welcome discussions with HES on our recent Future Planners project work (which has also involved both the RTPi and Scotland's planning schools), as there may be an opportunity to work collaboratively to ensure there are staff within local authorities with the skills needed to achieve the strategy's aims.

On KPI 5, HOPS recognise the proposed requirement to embed the historic environment within local place planning, and would suggest that HES work collaboratively with planning authorities to help curate the necessary advice and information to pass on to the communities that are creating local place plans.

KPI 6 could go further by linking into the Play Sufficiency Assessments produced by planning authorities, and the associated consultation processes that will need to be set up in order to equitably hear young people's voices within the development plan process (rather than potentially setting up additional channels for consultation). There could also be a link into work experience, career development and apprenticeship opportunities which tie into educational improvement.

KPI 7 provides an opportunity to link into the development of a green economy and green jobs/skills – many heritage skillsets will likely fall under nature-based enterprises or SME brackets.

19. Under each KPI, we have set out the actions we might take at a local (regional) level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

Please select only one item

Comments:

KPI 4 – HOPS have already undertaken, and will continue to undertake, work to identify staffing and skills gaps in planning authorities – however we would caution that this a long-term project with no immediate resolution, particularly with the current resourcing pressures facing the public sector. Collaborative working across the sector and across organisations will be key to filling some of these gaps.

20. What structures and mechanisms are needed to oversee successful delivery of the new historic environment strategy?

HOPS are aware that “the formal success criteria for each outcome and its measure will be published in the final strategy” and would note that formal metrics for measuring the success/outcomes of each KPI would indeed strengthen the document (see question 20).

The final document should also include a standardised methodology for data recording. If there is no ability to record and monitor whether and to what extent KPIs have been achieved, it will be a) difficult to discern whether there has been any positive benefit to local communities and/or local authorities; HES; etc. and b) difficult to inform future decisions on refreshed KPIs.

21. Participants attending the engagement workshops asked for regional opportunities and mechanisms to help deliver the strategy. Do you have suggestions for how a regional approach to delivery might work?

No comments

22. If applicable, what role would you like to have in delivering the strategy? An example of a role could be taking part in a steering group overseeing delivery of the strategy or taking part in a working group that delivers to a particular priority.

Planning authorities already play a significant role in managing the Historic Environment through the planning process; managing council-owned buildings and land; and providing advice to other parties.

HOPS would support all areas of the strategy which align with our national and local planning priorities, and which are felt to be beneficial to the communities we serve (this includes placemaking; protecting and enhancing our Historic and Natural Environment, etc.).

HOPS would again note that we benefit from positive engagement with HES across our executive committee and sub-committees and that we would welcome any future discussions on any specific areas of this strategy where planning authorities will play a role in implementation.

Final comments and follow ups

27. Do you have any final comments on the draft strategy?

There may be a need to reconsider the wording of the document and to steer away from phrases such as ‘nationally we will’ and ‘locally you can’; these could be considered by some

to be divisive, rather than promoting a collaborative relationship between national and local governing bodies.

We would reiterate that a number of the proposed KPIs place a not insignificant ask on planning authorities and we would caution that more discussion is perhaps needed on whether these are achievable in their current wording, against the backdrop of resourcing issues across the public sector. HOPS would welcome a meeting with HES to discuss this further.

Whilst the built environment is important, it only forms one part of the wider Historic Environment – other assets such as e.g. landscapes could be given more emphasis.

The document should include reference and statistics on undesignated remains (buried archaeological remains; archaeological monuments; historic buildings; historic landscape; historic townscapes, etc.) as these are over 95% of Scotland’s Historic Environment.

The Historic Environment should be defined in the document.

It should be recognised that the Historic Environment does not operate in a vacuum - most decisions affecting change in the Historic Environment are made through the planning process, and this could be given greater visibility in this document

The Principles of Understand, Care, Protect and Enhance should also be referenced in this document.

HOPS are aware that “the formal success criteria for each outcome and its measure will be published in the final strategy” and would note that formal metrics for measuring the success/outcomes of each KPI would indeed strengthen the document (see question 20).