

Submitted by email

scotplan@gov.scot

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Dear Madam/Sir,

Thank you for the opportunity to contribute ideas ahead of the development of the National Planning Framework 4 (NPF4). I am writing on behalf of the Chartered Institute for Archaeologists (CIfA). Our response focusses on historic environment policies and how these have a potential to contribute to national high-level objectives under the revised NPF4.

In summary, we would like to highlight

- the need to protect the scope and weight of existing policy and guidance when designing the new structure for NPF4 and its supporting guidance,
- the opportunities for improving existing policies, including by embedding the concept of cultural significance of heritage assets into NPF4,
- the opportunities to advance the mainstreaming of the historic environment within planning policy to ensure that its contribution to key agendas such as sustainability, placemaking, community empowerment and climate change can be maximised.

In light of Coronavirus, the full impacts of which we will not know for some months, it may be more important than ever to ensure that we have a robust system of planning policies to ensure sustainable development, and resilient services in place to provide them during the period of re-building after the crisis. If economic downturn follows, we know that in the past this has led to pressures to relax planning regulations at the expense of the safeguards and progressive ambitions for placemaking and sustainable development. Like many others, historic environment specialists in local authorities all over Scotland are currently working hard to ensure that planning still upholds protections for archaeology and heritage and delivers public benefit, contributing to Scotland's national goals.

1. General comments

- 1.1. We strongly support the principles guiding planning reform in Scotland. Sustainability, placemaking, strengthening communities and the response to climate change are key to shaping the framework for delivery on the Planning (Scotland) Act's purpose of planning to 'manage the development and use of

land in the long-term public interest'. NPF4 should have a strategic focus on ensuring planning serves these objectives.

- 1.2. Effective management and conservation of the historic environment is an element of delivering on this purpose. *Our Place in Time: The Historic Environment Strategy for Scotland* identifies planning as one of the main mechanisms by which the balance between protection and managing change is considered¹.
- 1.3. The historic environment is a finite, non-renewable resource which must be carefully managed to ensure that we preserve the sites, places, buildings, and monuments that we want to pass on to be enjoyed by future generations and which are vulnerable to change. Decisions affecting the historic environment, including those taken in the planning system, should include careful consideration of cultural significance.
- 1.4. Positive approaches to managing heritage also create benefits. Heritage promotes a sense of place which is at the heart of the creation of strong cultural identities and unique places. It promotes sustainable communities and creates opportunities for participation which can promote health, wellbeing, and empowerment. It is central to Scotland's tourism offer.
- 1.5. The purpose and value of the historic environment is set out in *Our Place in Time: The Historic Environment Strategy for Scotland* (OPiT), and in Historic Environment Scotland's *Historic Environment Policy for Scotland* (HEPS). We strongly support these documents' exhortations of the vision, principles, and policies for how heritage contributes to Scotland's culture, environment, prosperity and happiness.

2. Maintaining existing policy provision

- 2.1. It is our opinion that national policies in SPP, supported by specific government guidance such as PAN 2/2011 provide an effective system for managing and conserving the historic environment and generally function well where resourced sufficiently. Further supporting guidance from Historic Environment Scotland and professional standards from CfA also help to support applicants and practitioners to apply planning policies effectively.
- 2.2. Local development plans usually echo SPP, although many Local Authorities have supplementary planning policies, many of which are spatial in nature, some of which add additional layers of policy to managing the historic environment (for example, local lists, community stewardship, etc.).

¹ OpiT p.18

- 2.3. It is critical that we maintain the existing provisions which enable heritage to be appropriately managed through the planning system. SPP includes many policies which are essential for the maintenance of the historic environment, for example, to require the maintenance of Historic Environment Records and having access to professional archaeological advice, and which dictate requirements for non-designated heritage assets which make up an estimated 95% of the nation's heritage.
- 2.4. Mostly these existing policies do a good job at securing sustainable development by enabling effective systems for plan-making and development control. Any widespread loss of these policies is likely to be to the detriment of managing the historic environment.
- 2.5. In addition, PAN 2/2011 also includes important guidance on archaeology to support the implementation of SPP policies and NPF strategic objectives. It will be important to retain this layer of guidance following the merging of SPP into NPF4.
- 2.6. Scottish Government recently cancelled a light-touch update of PAN 2/2011 but there will be a need to fully update this guidance in response to NPF4, to bring the guidance up to date, and to take advantage of opportunities to improve it presented by NPF4. For example, by introducing the concept of 'archaeological value' which is a valuable principle which enables much clearer understanding of the cultural significance of archaeological heritage and how archaeological work to investigate and record it undertaken through the planning system works (see 3.2, below).
- 2.7. The structure of the various levels of policy and guidance will need to maintain all these existing provisions, and at least maintain the weight that this policy and guidance has in the planning system.
- 2.8. We support making SPP part of the statutory development plan by merging it into NPF4. We also support streamlining the strategic framework set out in NPF3 with the policies in SPP, provided that the critical content in SPP is not reduced or downgraded.
- 2.9. Embedding SPP within NPF4 may provide an opportunity to improve the mainstreaming of various policy areas such as the historic environment into high level outcomes. SPP already does this well in some regards, for example, by including specific references to cultural heritage and the historic environment under the principle of sustainable development.
- 2.10. We would favour a structure for NPF4 which set out high level objectives (e.g. sustainability, placemaking, community, wellbeing, environment and climate change), described the contribution of all policy areas to these objectives, and

also included a specific ‘subject policies’ chapter on valuing and managing the historic environment.

3. *Comments on protecting and improving existing policies*

3.1. The existing SPP should be updated to take account of the development of the concept of cultural significance. Historic Environment Scotland (HES) defines cultural significance as the

“aesthetic, historic, scientific or social value for past, present or future generations. Cultural significance can be embodied in a place itself, its fabric, setting, use, associations, meanings, records, related places and related objects.”

3.2. We further recommend that an expression of archaeological value would be a useful addition or renaming of ‘scientific value’ to understanding cultural significance of heritage assets in the planning system. Heritage assets with archaeological value (value deriving from the ability of an asset to yield information about the past) can be investigated, for example through physically destructive techniques like excavation. Undertaking archaeological investigation converts archaeological value into historic or social value. Thus, archaeological investigation may *add* value to cultural significance (by augmenting historic value through increasing understanding) even though it may be physically destructive.

3.3. We recommend that it may be appropriate to incorporate the 6 ‘policies for managing the historic environment’ as set out in HES’ *Historic Environment Policy for Scotland* document. The document should also be linked within NPF4 and recognised as supporting guidance.

3.4. It is essential to retain a policy on pre-determination archaeological evaluation in NPF4, and to use supporting guidance to emphasise the benefits of this approach to informed decision-making and the difficulties that post-determination evaluation can create.

4. *Comments on innovation and mainstreaming*

4.1. We want to make sure that heritage is capable of being at the heart of planning’s contribution to high quality places, with strategies for heritage-led regeneration, adaption to climate change and enhancing the distinctive character of places clearly envisioned by planning policy.

4.2. Examples of how to do this include privileging projects which make good use of existing building stocks and ensuring good design controls in conservation areas or areas of high archaeological importance.

- 4.3. We would like to see clear articulation that archaeology is undertaken for the purposes of producing public benefit, both in terms of knowledge gained about the past, but also as a tool for public engagement, community involvement, and health and wellbeing.
- 4.4. Ensuring that planning policy enables heritage to be a part of local place plans and builds on the existing mechanisms for community stewardship of heritage assets (e.g. Archaeology Scotland's *Adopt-a-Monument* project) and other progressive community participation being explored by Historic Environment Scotland's *It's Your Heritage* project.

5. *Concluding comments*

- 5.1. We are grateful for the opportunity to engage early with this process and for the extension to the deadline provided due to the Coronavirus outbreak. If we can provide any more information, please do not hesitate to contact us.

Yours faithfully,



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About the Chartered Institute for Archaeologists (ClfA)

ClfA is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society. ClfA has over 3800 members who study and care for the past through its physical remains. These remains whether built, buried, on land or underwater, extraordinary or everyday, magnificent or mundane all contribute to our historic environment. The resources of the historic environment, like those of the natural environment, are for the benefit of everyone in society, today and in the future, and need to be treated with care and expertise.