



HISTORIC
ENVIRONMENT
SCOTLAND

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EACHDRAIDHEIL
ALBA

By email to: sea.gateway@gov.scot

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Our ref:
Our case ID: 300037931
Your ref: 01563 Scoping
26 March 2020

Dear Ms Georgieva-Diaz

[Environmental Assessment \(Scotland\) Act 2005](#)
[Scottish Government - Integrated Impact Assessment National Planning Framework 4](#)

Scoping Report

Thank you for your consultation which we received on 21 February 2020 about the above scoping report. We have reviewed this in our role as a Consultation Authority under the above Act. Our comments are focussed on the Strategic Environmental Assessment part of the integrated assessment set out in the Integrated Impact Assessment screening and scoping report. This letter contains our views on the scope and level of detail of the information to be included in the Environmental Report. Please note that our view is based on our main area of interest for the historic environment.

Scope and level of detail

It is our understanding that the National Planning Framework 4 (NPF4) will be Scottish Ministers' long-term spatial plan for Scotland in 2050 and that by incorporating Scottish Planning Policy it will also set out Scottish Government national planning policies. We understand that NPF4 will have the status of 'development plan' for decision-making purposes which means that it will be used for day-to-day decision making on planning applications.

We note and welcome that the historic environment has been scoped in.

On the basis of the information provided, we are broadly content with the proposed approach and are satisfied with the scope and level of detail proposed for the assessment, subject to the comments in the attached annex.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



Consultation period for the Environmental Report

We note the timescales set out for the next steps for the NPF4 plan-making process and the accompanying SEA Environmental Report as set out on page 34. However, we also note that in light of the COVID-19 outbreak that the early engagement period for NPF4 has been extended to 30 April 2020. It is not clear whether it is anticipated that this will have any knock-on effects on timescales for the preparation of the plan and the accompanying Integrated Impact Assessment. Given the unprecedented nature of the current situation, we would be happy to assist you with the assessment of effects, if that would be helpful to you. We would be happy to discuss this with you in due course.

Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Adele Shaw who can be contacted by phone on 0131 668 8758 or by email on Adele.Shaw@hes.scot.

Yours faithfully

Historic Environment Scotland



Annex

Methodology

We welcome the proposed methodology of setting out the Environmental Report in a narrative style with tables/matrices and mapping. In addition to identifying constraints, it may also be useful to identify opportunities. For example, this may help to identify priorities for heritage-led town centre regeneration as an opportunity, particularly where there are either Conservation Area designations or numbers of B and C listed buildings. In making provision for B and C listed buildings and undesignated heritage assets, we note and welcome that you have taken our comments from previous conversations into account.

SEA objectives

By looking for opportunities rather than just assessing aspects of the environment as constraints, this will also help you to identify the interrelationships between environmental topic areas more fully. We note and welcome the inclusion of reference to the historic environment in population and human health.

There are many more interrelated aspects which could be picked up in the SEA such as the historic environment and geodiversity and the historic environment and material assets. For example, indigenous Scottish traditional building materials are an integral part of the character of our places and form a visual connection to the landscape. Most of Scotland's traditional stone structures reflect the diverse geology that sits beneath them; the materials chosen to build walls and roof vernacular structures reflect the local materials were close to hand. The use of indigenous traditional materials is an essential part of protecting the character of Scotland's traditional buildings and places. On this basis, it would be useful to take account of these matters in the material assets topic. We suggest amending the example SEA objective under this topic as follows:

'Reduce use and promote sustainable management of natural resources *and heritage assets*.'

Appendix A: Environment Baseline Information

Existing environmental protection objectives

We note summary of policy aims as set out in the blue box. We would highlight that the policy approach set out in the Historic Environment Policy for Scotland (HEPS) aims to ensure that decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations (HEP 1).

Scotland's Historic Environment in Numbers



It is not clear where the figures in paragraph 1.81. The most recent figures from [Scotland's Historic Environment Audit](#) (SHEA) prepared in 2018 puts the figure for known heritage assets at 332,000 rather than the 320,000 and we recommend that this is corrected. As the statement in this paragraph notes, this figure includes those sites designated at international and national level as well as undesignated assets, these assets themselves have many layers of meaning and significance for communities internationally, nationally and locally. We recommend that the sentence that follows this corrected sentence is also amended to note that Scotland's historic environment resonates internationally and nationally as well as being culturally important to local communities.

It is not clear where the conclusions on the condition of designated assets included in paragraph 1.8.2 has been drawn from. It would be helpful to include references to the sources of information for such conclusions. If this information has been drawn from the SHEA it is important to ensure that the meaning of the information presented in the SHEA has not been misinterpreted and that the dates for the SHEA are correct.

Cultural Heritage and Historic Environment – Key Pressures

Again, it is not clear where these key pressures have been drawn from. We note that the footnote refers to HEPS. If these issues have been drawn from the challenges and opportunities diagram within HEPS, please note that they are not a prioritised list of matters to be addressed and we would discourage their treatment as such. We would be happy to discuss these with you further to identify key pressures which may be relevant to NPF4 and its SEA.

Historic Environment Scotland
27 March 2020