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Dear Sir/Madam

Scottish Planning Policy: Consultation response

Built Environment Forum Scotland (BEFS) is a forum that brings together non-governmental organisations with a built environment remit and acts as national intermediary for Scotland's historic environment sector. Through its member organisations, BEFS connects with over 325,000 individuals through 300 organisations.

This response draws largely on contributions made at a BEFS workshop held on the 25 June 2013 on the theme and from further contributions from member organisations. Members support Outcome 2: Planning protects and enhances Scotland's built and natural environments as valued national assets.

Q1. Sustainable Economic Growth

The SPP should provide a clear definition of the term 'sustainable economic growth'. In the Parliamentary debate on the matter of the NPF3 and SPP a definition was produced by Kenneth Gibson MSP:

Just for clarification, I point out that the Organisation for Economic Co-operation and Development defines "sustainable economic growth" as: "the upward trend in environmentally adjusted net domestic product (EDP) under certain conditions and assumptions". Ergo, it is the rate of growth that can be maintained without exhausting natural resources and creating problems for future generations. I hope that that clarifies it for everyone.

This would clarify the environmental imperative.

Para 17, bullet point 3 could present a significant threat to the historic environment which is not privileged with being given counterbalancing "significant weight". Any economic benefit must be sustainable, i.e. long term and without diminishing a finite resource such as the historic environment.

Q2 Location of New Development – Town Centres

Town centre health checks are welcomed in line with the recommendation of the National Review of Town Centres. The External Advisory Group Report acknowledges the scarcity of research and a pilot project is therefore necessary both as a model and to make clear what additional funding local authorities will require. BEFS Small Towns Initiative could contribute to establishing a pilot.

Street level vacancy rates should not be analysed in isolation from the vacancy of upper floors: the two are intrinsically linked. The National Review of Town Centres draws attention to this in advocating the reuse of vacant upper levels for needed affordable housing which would in turn create a demand for diverse street-level commercial uses.

Physical and mental wellbeing should be included as indicators using Scottish Neighbourhood Statistics and the Warwick-Edinburgh Mental Wellbeing Scale. The Buildings at Risk Register for Scotland should be a further indicator in assessing the condition of historic buildings in town centres.

Q3 Location of New Development – Town Centres

Planning Advice Note PAN 71: Conservation Area Management could provide a suitable model for Scotland Town Centre Strategies.

Q5 Location of New Development – Rural Development

There is broad support for rural spatial strategies as the historic environment is a key asset in the development of small settlements, making them distinctive and attractive places which can be sensitive to change. Para 69, bullet point 2 should conclude "natural and historic environments are protected and enhanced".

Q23 Structure and Tone

Style of the document: The document is drafted for a professional readership. Use of language and jargon could be reviewed for the SPP to reach a wider audience. This could be aided by an extended glossary.

Q24 Monitoring

The SPP must be monitored and we would advocate the use of Scottish Historic Environmental Audit and relevant developments thereto as one means of doing so. Further, it is important that monitoring assesses more than speed of decision making but quality of outcome.

Q29 Other Comments

Valuing the Historic Environment(para 114-124): The draft SPP interchanges "cultural heritage", "historic environment" and "historic built environment" without providing definitions. The term "historic environment" should be used, consistent with the forthcoming Historic Environment Strategy for Scotland. The definition should encompass: archaeological sites and monuments, buildings and architecture, gardens and designed landscapes, battlefields and other cultural landscapes, palaeo-environmental sites, marine and maritime sites, *in situ* artefacts and archives, designated and undesignated sites.

The SPP frequently refers to the historic environment in relation to re-using buildings: it should be made clear that many archaeological sites, particularly buried ones, do not and should not lend themselves to adaptation.

There is a danger that simplification of the SPP has reduced emphasis on the positive role the historic environment plays in the Scottish economy and the major contribution it will make in achieving sustainable environmental targets. The historic environment is crucial to all the Principle Policies of SPP: Sustainable Development, Engagement, Climate Change, Placemaking and the Location of New Development and this must be reflected by reference to it throughout the text giving it the weight afforded the natural environment.

The wording of para 116 implies that heritage assets that are not defined as strategically important require less protection. Para 119 should include protection for the setting of conservation areas (see DPEA decision PPA-230-1061).

The importance of the historic buildings and their potential for re-use and redevelopment needs to be emphasised with a direct connection to NPF3's aim of 'reinvigorating existing settlements'.

Reference to Historic Environment Records: the omission in Para. 124 of the current SPP of 'Planning authorities should ensure they have access to a Sites and Monuments Record and/or a Historic Environment that contains necessary information about known historic environment features and finds in their area' is significant. These records play a crucial role in helping anyone involved in managing the historic environment (all aspects - not just designated sites) understand what is special about a site or place. Reference to these records should be reinstated. Under Key documents in this section the SPP ought to refer to the developing strategy for Scotland's historic environment data (Scottish Historic Environment Data Strategy).

I hope that these points are helpful. Please get in touch if you would like to explore these views further. We would be grateful if you would keep us informed of developments relating to this consultation.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jo Robertson', written in a cursive style.

Jo Robertson
Senior Policy Officer - Historic Environment