



NPF Team
Scottish Government
Planning & Architecture Division
Area 2-J South
Victoria Quay
Edinburgh
EH6 6QQ

23rd July 2013

Dear Sir/Madam

National Planning Framework 3 - Main Issues Report and Draft Framework Consultation

Archaeology Scotland is a voluntary membership organisation which works to secure the archaeological heritage and the wider historic environment of Scotland for its people through education, promotion and support, and is a voice for the archaeological community. We welcome the opportunity to respond to this consultation as the planning system is vital for the protection, enhancement and appreciation of this resource, especially for 92% of assets that do not have statutory protection.

Archaeology Scotland welcomes Scotland's Third National Planning Framework. As we have also discussed in our response to the Draft SPP, we remain uncomfortable with the term 'sustainable economic growth' and do not believe this is helpful in achieving the vision set out here. The debate at Holyrood held [on the 12th June 2013 on NPF3 and the draft SPP](#) showed there was no clear international or national definition to this term. We would prefer the use of the term 'sustainable development' which does have clearly agreed international definitions and is a statutory obligation as set out in the 2006 Planning Act. We note recent initiatives by the Reid Foundation to promote the concept of the [Scottish Common Weal](#) supporting public wellbeing rather than the limitations of the mis-named concept of 'sustainable economic growth' and believe that NPF3 should focus more on sustainability and well-being for the communities and people of Scotland.

In terms of the outline headings of a *low carbon place*, a *natural place to invest*, a *successful, sustainable place* and a *connected place* we welcome reference to place-making as central to this framework and believe that historic places have a vital role in creating a sense of place for communities and individuals in Scotland.

This building on the past does not come through strongly enough in this consultation document. [It is clear to us that historic places have a pivotal role in creating a sense of identity and place for communities and individuals in Scotland] and yet it is the vital glue in creating better places to live, work and explore our surroundings. Reference to natural places and successful/sustainable places is not enough.

In general we do not have criticisms of the proposed national developments provided that proper assessment is carried out of their impacts on the historic environment assets affected by these developments. The Strategic Environmental Assessment only deals with the statutory designations (covering perhaps 0.3% or less of the area of Scotland) and as over 90% of individual historic environment sites are not designated we consider a more robust process of identifying the impacts of national developments might be required. Historic landscapes, for example, other than those recorded in the Inventory of Gardens & Designed Landscapes are not protected by the designation process and the completion of the national [Historic Land Use Assessment](#) (*n.b.* note that a new more-user friendly web interface is currently being developed by Historic Scotland/RCAHMS for this dataset). Non-designated historic environment assets are a material consideration in the planning process and are a standard consideration in Environmental Impact Assessments and so are routinely considered by local authority planners as part of the development process.

In terms of *a natural place to invest* Archaeology Scotland would like to stress the importance of our historic environment assets in creating attractive places to visit and view both in our countryside and urban areas. This has been recognised in the support given by the Heritage Lottery Fund for landscape initiatives and would stress that they are more than just a habitat enhancement projects but also recognise the significance of the local heritage.

It is worth noting that a recent study commissioned by the HLF [The economic impact of the UK heritage tourism economy 2013](#) has shown that this is now worth £26.4bn p.a. This report identifies that *'for example, based on figures for 2011 from the ONS Annual Business Survey, the estimated £5.07 billion in direct GDP attributable to the heritage tourism economy is larger than the value added of the agriculture, forestry and fishing industry (£1.7 billion), the beer manufacturing industry (£2.4 billion), the paper and paper products manufacturing industry (£3.9 billion), and the construction of roads and railways (£2.8 billion).'*

The March 2013 update of the 2020 Scottish Tourism Strategy identified Heritage as a [Key Message](#), stating:

'With 48% of tourists to Scotland visiting historic houses and castles, heritage is a key asset for Scotland's visitor experience. Historic Scotland is currently taking the lead in discussion with other heritage tourism organisations to develop an action oriented heritage tourism plan to align with the National Strategy;' Tourism Scotland 2020.

We are happy to support the development of 'an enhanced network of long-distance paths' (para.3.19) and would emphasise in this connection the importance of utilising existing routes whether the 18thC Military Road network used for part of the West Highland Way, St Cuthbert's Way used to link the Border Abbeys with the East Coast or the developing network of trails being promoted by the [Scottish Pilgrim Route Forum](#).

We would also wish to emphasise the good work already done by the [Heritage Paths Project](#) in revitalising Scotland's historic paths for the future and would suggest that this project should be further supported and developed as part of NPF3 to enhance the network.

As a national development as part of enhanced long distance networks, we would specifically recommend that the Scottish Government look at developing networks related to the Roman Forts, Roads and Camps in Scotland. Sites such as Ardoch and Inchtuthil are internationally important and connected to the changing Roman frontier in Britain, already recognised through the Antonine Wall World Heritage site as part of an the Roman Limes. Developing such a trail would provide enhanced resources to tourists as well as offering better protection and recognition to these nationally and internationally important sites.

We are disappointed that the proposals for new national parks have not been taken up and would like to see some commitment to exploring this further as the two existing National Parks have brought a wide range of environmental, social and economic benefits to Scotland.

Under *a successful, sustainable place* we welcome references to place making and a sustainable settlement strategy. These must recognise the important of past in creating a sense of place and the embodied energy held within existing stone and other buildings. There is and should be a presumption on retaining our historic buildings unless there are overwhelming reasons not to do so. This is consistent with Scottish Government policy as defined in the [SHEP](#) and the draft [Historic Environment Strategy](#) currently also undergoing consultation.

Yours faithfully

A handwritten signature in blue ink that reads "Jonathan Wordsworth". The signature is written in a cursive, slightly slanted style.

Jonathan Wordsworth
Rural Land Use Adviser