



Consultation response

Historic Environment Scotland Draft Historic Environment Policy

Date: December 2018

Description: This consultation from Historic Environment Scotland sought views on their updated Historic Environment Policy.

About us

Historic Houses represents the UK's largest collection of independently owned historic houses; our family includes over 1,650 historic houses, castles and gardens.

The places we represent are often deeply embedded in rural communities: as local heritage landmarks; as tourist attractions; as small businesses in their own right, as well as hubs for other local businesses; as employers and clients; as providers of community space and leisure activities; and of course, as land managers and stewards of rural heritage and landscapes.

Historic Houses places in Scotland welcome over six million visits a year, generating over 4,000 full time equivalent jobs as well as spending over £21 million on goods and services from over 3,500 local suppliers.

Questions

To what extent do you agree with the following statements?

The purpose of the Historic Environment Policy (HEP) is clear. **Agree**

The status of the HEP is clear. **Agree**

I understand what the policy is trying to achieve. **Agree**

Which of the following functions DO you think the draft HEP performs? Please select all that apply

Promotes an inclusive understanding of the values of the historic environment **X**

Promotes people's participation in decisions concerning the historic environment **X**

Encourages a consistent and integrated approach to decision making in support of positive outcomes for the people of Scotland

Supports the vision and aims of Our Place in Time, Scotland's strategy for the Historic Environment **X**

Reflects principles set out by international charters and conventions on cultural heritage and landscapes **X**

Provides guidance for decision making affecting the historic environment **X**

The proposed name for the policy is the Historic Environment Policy (HEP). To what extent do you feel this name is a suitable title, reflecting the policy's content and status?

Neither agree not disagree

Do you have any alternative suggestions for the title of the finalised policy?

N/A

We have identified 14 challenges and opportunities in recognising, caring for and managing the historic environment. To what extent do you agree or disagree with the inclusion of each of these challenges and their definitions? Do you have any comments on them?

1. A holistic approach to the environment **Strongly Agree**

No comment

2. Climate change **Strongly Agree**

No comment

3. Community participation and empowerment **Neither Agree nor Disagree**

Historic Houses does not dispute that there is a place for community engagement in many decision-making processes, but we would dispute that having more voices in any decision-making process is automatically a good thing.

Most Historic Houses places are at the centre of their communities, whether they are open as visitor attractions, as venues, or have other businesses based on the estate. As such, it is generally the case that they consider issues such as community impact and often consult with their community before making changes.

The extent and / or formality of community consultation should be proportionate with the changes that are being proposed, and we would like to see more emphasis on proportionality in the final draft of the HEP.

4. Diversity and equality **Strongly Agree**

No comment

5. Economic change **Strongly Agree**

No comment

6. Funding **Strongly Agree**

No comment

7. Intangible heritage **Strongly Agree**

No comment

8. Land management **Strongly Agree**

No comment

9. Creating and maintaining places **Strongly Agree**

No comment

10. Regulatory change **Strongly Agree**

11. Roles and responsibilities **Strongly Agree**

No comment

12. Skills and capacity **Strongly Agree**

No comment

13. Societal change **Strongly Agree**

No comment

14. Sustainable tourism **Strongly Agree**

No comment

Are there any gaps in the challenges and opportunities listed above?

In general, Historic Houses agrees with this list of opportunities and challenges, and we are pleased that people will be encouraged to think about these myriad areas when considering the importance of the historic environment. We are also pleased that these challenges and opportunities recognise the need for heritage assets to be economically viable. While many historic houses and other heritage assets generate some income through tourism, many others have diversified into weddings, corporate events, and letting business units, for example. Many of Scotland's historic houses also work hard to keep the heritage in their care well looked after and open to the public through educational activities and learning programmes and running events for their communities such as Christmas fairs, live music events and festivals. This sort of business diversification is often crucial to enable independent historic houses in Scotland to generate enough income to look after the fabric of their buildings and landscapes, and as such, these areas should be considered in future iterations of the HEP.

Understanding and Recognition

The core principles in the draft HEP set out a shared understanding of how the historic environment should be managed. The accompanying policies set out how these principles should be applied. To what extent do you agree or disagree with the following core principles for Understanding and Recognition?

A wide range of values can contribute to cultural significance **Agree**

Knowledge and information about the historic environment is critical to the understanding of our past, present and future. A place must be understood for its significance to be identified.
Strongly Agree

The historic environment evolves over time, and so does our understanding and appreciation of it. **Strongly Agree**

We are all responsible for enhancing our knowledge and making it widely accessible.
Neither Agree nor Disagree

Do you have any comments on these core principles?

N/A

The related policy set out how these principles should be applied.

HEP 1 – Decision makers should adopt a holistic approach to the historic environment, incorporating an inclusive understanding of its breadth and cultural significance.

Do you have any comment on the policy?

N/A

Managing change

The core principles in the draft HEP set out a shared understanding of how the historic environment should be managed. The accompanying policies set out how these principles should be applied. To what extent do you agree or disagree with the following core principles for managing change?

Change has to happen for places to thrive **Agree**

Good decisions take a long-term view **Strongly Agree**

Good decisions are transparent, robust, consistent and proportionate **Strongly Agree**

Caring for our historic environment benefits everyone, now and in the future **Strongly Agree**

To manage the future of the historic environment in a sustainable way, its significance and the significance of elements within it have to be understood **Strongly Agree**

Good decisions make sure that nothing is lost without considering its value first and exploring options for avoiding its loss **Agree**

Good decisions retain the cultural significance of the historic environment **Strongly Agree**

Do you have any comments on these core principles?

N/A

The related policies set out how these principles should be applied.

HEP2 – Decision makers should ensure that the benefits, understanding and enjoyment of the historic environment are secured for the long term.

HEP3 – Strategic plans policies and the allocation of resources should protect and promote the historic environment. Where detrimental impacts on the historic environment arising from plans and programmes are identified and unavoidable, steps should be taken to demonstrate that other options have been explored and mitigation measures put in place.

HEP4 – When considering changes to specific assets and their context, significant harm should be avoided. Opportunities for enhancement should be sought where appropriate. Where detrimental impacts on the historic environment are unavoidable, these should be minimised, and mitigation measures put in place.

Do you have any comment on the policies?

N/A

Working Together

The core principles in the draft HEP set out a shared understanding of how the historic environment should be managed. The accompanying policies set out how these principles should be applied. To what extent do you agree or disagree with the following core principles for Working Together?

Everyone has a stake in the historic environment and how it is looked after **Agree**

Effective management is a collective effort **Neither agree nor disagree**

Effective management should be undertaken in balance with the surrounding environment. **Agree**

The best management involves empowering and involving communities **Neither agree nor disagree**

Early dialogue and close collaboration lead to better outcomes **Agree**

Do you have any comments on these core principles?

Most Historic Houses places are at the centre of their communities, whether they are open as visitor attractions, as venues, or have other businesses based on the estate. As such, it is generally the case that they consider issues such as community impact and often consult with their community before making changes. The extent and/or formality of community consultation should be proportionate with the changes that are being proposed, and we would like to see more emphasis on proportionality in the final draft of the HEP.

The related policies set out how these principles should be applied.

HEP5 – Everyone should have the opportunity to enjoy our historic environment, to contribute to our shared knowledge and to participate in decision making.

HEP6 – People should be empowered to benefit from the historic environment for the purpose of the sustainable development of their communities and places.

Do you have any comment on the policies?

Historic Houses agrees that it is important for everyone to enjoy and benefit from the historic environment. However, as raised previously in this questionnaire, it is not always practical or proportionate for every decision about a heritage asset, especially those in independent ownership, to be made open to the wider community. We hope that future versions of the HEP make this need for proportionality clear, and that HEP 5 and HEP 6 are redrafted to reflect this.

Guidance notes.

Alongside publishing the new policy, we will review and refresh these guidance notes. Are there any missing or unnecessary?

No comment

Do you have any further comments to add?

Historic Houses welcomes this document, and we think that it will be useful not only for Historic Houses places across Scotland, but for the heritage sector more generally.

However, it is worth reiterating that the majority of traditional and historic buildings in Scotland, and much of the historic environment, is looked after and managed by independent, private owners. As is noted in the questionnaire, a strong economy supports effective management of the historic environment. Where this is managed at little or no cost to the public purse, freeing up resources for investment in other priorities, this is a huge public benefit. Significant private investment in our historic environment over many centuries has played its part in shaping modern Scotland, and the needs and aims of independent owners need to be balanced with the priorities of government, local government and communities.

Historic Houses would also like to see an increased emphasis on proportionality in the HEP, especially with regard to community involvement / consultation when managing change. As mentioned previously, most Historic Houses places are at the centre of their communities, whether they are open as visitor attractions, as venues, or have other businesses based on the estate. As such, it is generally the case that they consider issues such as community impact and often consult with their community before making changes; however, it is important that the extent of community consultation should be proportionate with the changes that are being proposed, and as such we would like to see greater emphasis on proportionality in the final draft of the HEP.

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