



Conservation Officers Group (COG) is a forum for Local and Planning Authorities, conservation officers and other local authority officers involved in planning decisions, addressing conservation/heritage planning, practice, skills, and related matters. All 32 local authority areas across Scotland are represented. The aim of the forum is to share knowledge, experience, learning and to assist practice - whilst not replacing formal professional/legal advice. This statement is on behalf of the Conservation Officers Group and has been informed by round table discussions, and views gathered at workshops and in writing.

BEFS acts as Secretariat for the [Conservation Officers Group \(COG\)](#). Built Environment Forum Scotland (BEFS) is the umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment.

COG - Response to NPF4:

COG welcomes the opportunity to comment on the draft National Planning Framework (NPF4). Recognising the importance of the NPF4 in planning - incorporating aspects of Scottish Planning Policy (SPP) - the group would highlight the need for the policies, principles and strategies to be fully integrated, transparent and speak to each other in order to facilitate good decision making for the historic and built environment on the ground.

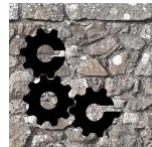
The group finds that overall, the structure is good, bringing together aspects of SPP and NPF3; the draft is felt to incorporate elements of both well but raises concerns around omissions and references to other key policies such as the Historic Environment Policy for Scotland (HEPS), PANs and a list of key documents and policies previously seen in SPP. It is also inconsistent, *referring* to publications and policies in some parts, whilst *including* sections of publications and policies in others.

Holistically, the draft is felt to lack consistency; it is appreciated that there hasn't yet been a final edit, however currently the different sections, in particular the spatial strategies, read (to an extent) in isolation.

COG welcomes the attention to the historic environment within the spatial strategy for Distinctive Places, as well as the detail contained within Policy 28. It is noted however that the historic environment *only* really sits within 'Distinctive Places' and isn't present or a focus of Sustainable, Liveable and Productive Places. It is felt that there is an opportunity here to recognise the role that the historic environment has, and the benefits it brings across the board - within sustainable development, jobs, homes and infrastructure, and supporting net zero. Relevant to this is the emphasis on repurposing buildings; whilst it is felt that more could be made of this, and there are some concerns about VAT as barrier, the approach is very welcome.

There is some apprehension felt as to how the NPF4 will be used alongside Local Development Plans, and a clearer picture of the interrelationship of existing plans and strategies, as well as the wider policy landscape would be welcome. Related to this, the draft NPF4 raises conflicts in wider policy around amenity space and town centre living; there is a problem within many city/town centre locations regarding conversion to residential use and lack of suitable amenity space. This should be addressed within the policy and some thought given to how to allow/encourage adaptive town centre living in densely developed areas where there is no amenity space available.

COG would also raise the question of how decision makers can balance competing priorities, informed by NPF4, considering economic necessities against other priorities. This is in part due to the wider issue of how sustainability is understood and how the use of our existing built environment is seen to fit within this.



Draft National Planning Framework – consultation.

31 March 2022

As a general point COG supports the use of Plain English wherever possible and suggests that the final edit of NPF4 would benefit from this approach.

A National Spatial Strategy for Scotland 2045

This is generally seen to be a positive section of the document; however, the spatial strategies seem to sit in isolation and don't currently meaningfully recognise the interconnectedness of different areas of Scotland. Moreover - as mentioned above - the necessary read across to policy is not felt to be strong enough.

In addressing this, COG refers to how tourism and culture are described throughout the draft and advocates that the same approach be taken for the historic environment. It is recognised that the initial Position Statement was much stronger on this, with the draft NPF4 seeming to step back on some of the positive approach seen previously.

National Developments

Closer scrutiny as to how these priorities interact with other Scottish Government strategies and targets would be welcome, to help identify conflicts between outcomes and provide clarity on how these conflicts will be managed. For example, there is no link to Building Standards despite reference to 'quality design'; a clear reference and line of sight here would be beneficial. Within the 6 Key Qualities of Places conservation areas are also a notable omission.

National Planning Policy

COG recognises that the policies are well intentioned and welcomes the overall direction, however notes concern that these are written in a way that could lead them to be 'traded'. If there is an intended weighting, clarity of hierarchy across strategies and policies should be clearly elaborated on.

COG would also request greater clarity regarding the national policies, and whether they allow the Local Planning Authority (LPA) the necessary flexibility to add their own historic environment policies into their planning decisions. An example of this is Aberdeen City Council's technical advice note on [External Building Materials and Their Use](#), supporting the importance of appropriate local materials in preserving a sense of place (and good maintenance practice).

Delivery

COG would note that detailed aspects of delivery are lacking in the draft document, and so at this stage the draft does not present a road map for delivery. More information about how the NPF4 will be delivered and monitored in practice, and further details around key issues such as resource, skills, capacity and budget would be welcome.

RESPONDENT INFORMATION

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Responding on behalf of an Organisation – **CONSERVATION OFFICERS GROUP** (BEFS is secretariat)

Draft National Planning Framework – consultation.

31 March 2022



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Page | 3

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