

Response ID ANON-EB2X-TV1H-M

Submitted to Scotland's protected historic places - consultation on a long-term strategy for heritage designation
Submitted on 2025-07-01 16:14:39

Background

About you

1 Your data

I agree to the privacy notice :
Yes

2 What is your name and email address? Please provide your details below.

Your name:
Jenny Munro

Your email address:
jenny.munro@rtpi.org.uk

3 Do you use heritage designations? (Select all that apply)

Yes - for my work

4 Are you responding as an individual or on behalf of an organisation, business or community group?

On behalf of an organisation, public body or charity

If you're responding as an organisation, business, or community group, please enter the name here :
The Royal Town Planning Institute Scotland

5 Historic Environment Scotland would like your permission to publish your consultation response Please indicate your preference.

Publish response with name

6 We may wish to contact you to discuss your response, but we require your permission to do so. Are you content for HES to contact you again in relation to this consultation exercise?

Yes

Vision, mission and approach

7 Do you support the vision, mission and overall approach?

Yes

Please provide any comments:

We are broadly supportive of the vision, mission and overall approach set out above. However, although we agree the general importance of protecting Scotland's historic places, we do not feel the vision, mission and approach go far enough and are missing a critical element which sets out the purpose and importance of heritage designation in Scotland. For example, what do we mean by "historic places" (in the vision) and why is it important for our historic environment to be "well managed for current and future generations" (in the mission).

Although we do not expect all the detail to be set out in the vision, mission and approach, at least some of the "Why" should be addressed to create a meaningful connection with the intended audience. As an example, in the mission, this could simply be a case of highlighting the social, cultural and economic importance of preserving past traditions and cultures through the careful management of historic sites and remnants.

In addition, we would welcome alignment in the vision with the purpose of planning introduced in the Planning (Scotland) Act 2019, by including reference to the "long-term public interest" of current and future generations.

8 We propose changing how we refer to designation in our strategy and communications. We often use this term to describe the legal recognition of historic sites. However, evidence indicates that the terms 'Designation', 'Designations', and 'Designate' are poorly understood by the public. We think it would be beneficial to make more use of the word 'protection' for its clarity of purpose. For example, 'designated historic sites' could become 'protected historic places,' and 'designation records' could be 'protected place records'. Please give us your views.

Please give us your views:

We do not have any significant objections to this proposed change, given that it appears to be purely linguistic in nature with no impact on the purpose, intent and impact of designations themselves.

Notwithstanding the above, we do wonder if a potential unintended negative consequence could arise whereby the use of the word “protected” triggers a blanket “no-change” perception by the public. Managing and maintaining historic assets may, in certain circumstances, require carefully considered alterations and interventions which continue to preserve heritage qualities and/or which balance the importance of protecting historic sites with the need to (as an example) achieve climate resilience and meet our net zero targets. Heritage preservation does not always mean keeping things exactly the same indefinitely to the detriment of other considerations, and this should be clear in the final strategy.

HES’ series of guidance entitled “Managing Change in the Historic Environment” usefully set out the key principles of managing (rather than preventing) change, recognising that change is necessary for historic buildings to stay in use over the long-term. It will be important for the final strategy to adopt this similar language to ensure that by protecting Scotland’s historic assets, we are not preventing their long-term continued use and (therefore) viability and survival.

Priorities 2025-28

9 We have identified four priorities for HES in delivering the designations strategy over the next three years. Do you agree with them?

Agreement with priorities - Objective 1: Looking ahead:

Agree

Agreement with priorities - Objective 2: Improving our information:

Agree

Agreement with priorities - Objective 3: Improving our service:

Agree

Agreement with priorities - Objective 4: Understanding our impact:

Agree

Please provide any further comments on the priorities:

We broadly agree with the objectives set out above, albeit that they are very broad with little detail.

We are particularly supportive of the capturing and communication of baseline evidence as set out under Objective 4. We have consistently called for improved, consistent and accessible evidence-based data to support the development and monitoring of policy and decision-making practices across Scotland. We are, therefore, pleased to see this proposed to be included as a clear objective within the strategy.

Objective 1 - Looking ahead

10 Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

Tell us what you think:

Although light on the detail, we are broadly supportive of the high-level intent of the proposed initiatives. We would strongly encourage HES to view the planning profession as a critical aspect of the collaborative and inclusive conversation, particularly to ensure a clear understanding is gained regarding the knowledge, skills and data needed for quality decisions to be taken in relation to heritage sites and buildings.

In addition to the above, we draw your attention to our response to Question 21, which sets out in more detail our broad concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

11 Our intention is to lead the strategic conversation about the whole system of heritage protection across Scotland to ensure an integrated and comprehensive approach. This includes aspects led by local authorities. We think that any discussions about the long-term future of heritage protection should adopt a ‘whole-system’ approach. For example, including how undesignated sites are managed in the planning system, and how locally and regionally important sites and places such as conservation areas are recognised and protected. Do you agree with our proposed approach to enabling discussions about the whole heritage protection system?

Yes

Please add any comments:

We agree that there needs to be a ‘whole-system’ approach to heritage protection that involves those aspects led by Scotland’s 34 local and national park authorities. Not all local and national park authorities are the same in terms of the heritage qualities to be preserved and the associated challenges this brings. For example, some authorities will have a significantly larger number of listed buildings compared to others, some will have more archaeological sites and features that require careful management, whilst others will have sites affected by a World Heritage designation.

As mentioned above, these conversations must also include an understanding of the knowledge, skills and data required for quality decisions to be taken in relation to these varying heritage assets. They also need to have regard to the unique context and circumstances of each local and national park authority. This is particularly important in light of the resourcing pressures currently being faced by authorities, which have seen many of them losing the in-house heritage and archaeological expertise required to deliver the heritage outcomes and associated community benefits as set out in the vision of

the proposed strategy.

Objective 2 - Improving our information

12 Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

Tell us what you think:

We are supportive of the broad intent of the initiatives and measures set out above. As previously mentioned, we are pleased to see information, evidence and data gathering as a key objective of the proposed strategy.

However, the success measures under this objective are incredibly broad and lack the precision and detail necessary to be considered an effective measure. For example, in “gathering public feedback on our records” there is no sense of a benchmark as to the quality, type, and range of feedback required to achieve the level of success for the objective to be considered met. As currently drafted, feedback from just one individual, group or community could tick off this success measure when in fact it would fall significantly short in achieving the objective.

We would welcome a clearer sense of the ambitious outcomes hoped to be achieved and measured through this strategy. In this regard, we draw your attention to our response to Question 21, which sets out in more detail our concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

Objective 3 - Improving our service

13 Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

Tell us what you think:

We are broadly supportive of the initiatives and measures set out above. In particular, we support the use of technology to streamline and enhance public engagement and decision-making processes.

Whilst we understand the need for prioritisation and streamlining to address HES’ internal capacity requirements, this should not be at the expense of the important external services that HES provides, including as a key agency and statutory consultee. For the planning system to work effectively and efficiently, statutory consultees play a vital role. We have heard from our members that one of the things that can hold up planning decisions are delayed responses from statutory consultees. It is important that in meeting the objective to reshape the service, it includes an examination of how HES currently meets its statutory consultee requirements with a view to ensuring that any reshape of the service enhances (and does not in any way diminish) their role as a statutory consultee.

In addition to the above, we draw your attention to our response to Question 21, which sets out in more detail our concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

14 When we set out a revised approach for handling external requests, we think we will need to be more selective to deliver the greatest impact with our available resource. An approach could be to prioritise new designation requests concerning under-represented sites, especially in high development/landuse pressure areas. What do you think of this approach?

How do you view this approach:

No comment other than to reiterate the above point that any reshape of the service should not be at the expense of HES’ role as a key agency and statutory consultee.

15 We are also likely to prioritise reviewing existing designations that we think are no longer justified or those where inadequate records are having a negative impact on their management, especially in high development/landuse pressure areas. Requests for less impactful cases, like address/category changes and minor corrections, may not be priorities. What do you think of this approach?

How do you view this approach?:

As above

Objective 4 - Understanding our impact

16 Give us your views on our proposed initiatives under this objective, and how we intend to measure progress?

Tell us what you think:

We are broadly supportive. As previously mentioned, we fully support the capturing and communication of baseline evidence. We have consistently called for improved, consistent and accessible evidence-based data to support the development and monitoring of policy and decision-making practices across Scotland. We are, therefore, pleased to see this proposed to be included as a clear objective within the strategy.

Once again, the success measures lack detail and precision. The first measure “to begin to measure the impacts of heritage protection” suggests that this has never been done before and ignores current monitoring initiatives undertaken through, for example, Scotland’s Historic Environment Audit. The second measure of “reporting on our findings” also lacks detail and precision regarding the intended audience, purpose, and outcomes of such reporting.

It is in these details that the measure of success can be captured, rather than through the action of reporting alone.

We would welcome greater clarity as to how success will be measured against a clear baseline of what is already being done, as well as further details as to the outcomes that will determine a successful measurement of success. In this regard, we draw your attention to our response to Question 21, which sets out in more detail our concerns relating to the lack of an outcomes approach to the proposed strategy, which affects all the proposed objectives, initiatives, and success measures.

17 By March 2027, we aim to gather baseline evidence on the impacts of heritage protection to enhance understanding. Please share your views on the research themes we are considering:

Give us your views:

We are broadly supportive of the broad research themes, albeit we would welcome additional details regarding the audience and outcomes – i.e. whose understanding is to be enhanced through this research and gathering of baseline evidence, and for what purpose.

Under the theme of Wellbeing/social/community we would welcome evidence around the impacts and contributions of heritage protection on and to Scottish Government policies - for example, local living and community wealth building.

Impact assessments

18 What impact do you think our strategy would have on people with the following characteristics?

Impact on protected characteristics - Age:

Impact on protected characteristics - Disability:

Impact on protected characteristics - Gender reassignment:

Impact on protected characteristics - Marriage and civil partnerships:

Impact on protected characteristics - Pregnancy/maternity:

Impact on protected characteristics - Race:

Impact on protected characteristics - Religion or belief:

Impact on protected characteristics - Sex:

Impact on protected characteristics - Sexual orientation:

Impact on protected characteristics - Socio-economic background:

Please tell us more:

No comment

19 What impact do you think the plan might have on people in island communities?

Not Answered

Please tell us more:

No comment

20 What impact do you think the strategy might have on the competitiveness of Scottish business, the third sector or on the regulatory context?

Not Answered

Please tell us more:

No comment

Anything else?

21 Please provide any other comments on our strategy in the box below.

Please type your answer here.:

Although we are broadly supportive of the overarching objectives, initiatives and measures set out above, it is our view that “Outcomes” is a missing element throughout the consultation paper. For example, under Objective 2, although the headline objective touches on the reasons for enhancing data – i.e. “so that Scotland’s historic protected places are better understood and valued” – it does not go into any further detail to explain why this is important,

whose understanding will be improved by the objective, and what outcomes will be achieved by meeting the objective through the initiatives. Likewise, although Objective 4 explains that it seeks to enhance understanding it does not go into any detail of whose understanding and for what purpose.

This gap results in a disconnect between the objective, initiatives and measures which in our view will weaken the overall integrity and impact of the proposed strategy. The outcomes must not merely be lightly touched upon (as they are currently), they must be fully embedded within the language and structure of the strategy to join the dots between the objective, initiatives and success measures to ensure that they have the substance that we believe is currently lacking.

We would welcome further consideration and inclusion of this missing element in the final iteration of the strategy.