

# SPP Review - Priorities for Change

## Contact Details

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## Policy Ideas

The review is of the SPP as a whole – please consider connections and tensions between policy subjects

Policy Subject/s : Historic Environment, World Heritage Sites, Sustainable Development & Outcomes

### What works?

The Institute is broadly happy with the way the sections in the SPP relating to the Historic Environment work at present, and would not wish to see any reduction in the many useful references the document contains. In particular and specifically, we would highlight the following examples of useful references that should be retained:

1. Para 110 in Historic Environment section of the SPP, which states that Scottish Government policy and guidance on the historic environment is set out in Scottish Historic Environment Policy (SHEP); and that the new SPP, SHEP and the Managing Change in the Historic Environment Guidance Notes should all be taken into account in development management and development plan preparation.
2. Para 111's statement that the historic environment comprises both statutory and non-statutory designations.
3. Para 111's statement that in some cases, the importance of the heritage asset is such that change may be difficult or may not be possible.
4. Para 113's clear statement that the interior of a building and pre-1948 curtilage structures are covered by listing.
5. Para 113's statement that there is a presumption against demolition or other works that will adversely affect a listed building or its setting.
6. Para 118's statement that development which will have an effect on a scheduled monument or the integrity of its setting should not be permitted unless there are exceptional circumstances.
7. The statement in para 120 of the World Heritage Sites section of the SPP, which states that Planning Authorities should protect World Heritage Sites from inappropriate development.
8. Para 121 which states that WHS Management Plans should be prepared and Planning Authorities should consider incorporating these as Supplementary Guidance.
9. Para 122's clear statement that the effect of a proposed development on a garden or designated landscape should be a consideration in decisions on planning applications.
10. Para 123's statement in the Archaeology section that planning authorities should ensure that developers undertake appropriate excavation, recording, analysis, publication and archiving before and/or during development.
11. Para 124's statement that Planning Authorities should ensure they have access to a Sites And Monuments Record and/or a Historic Environment Record.
12. Para 256 in the Outcomes Section of the SPP's useful statement that planning authorities should be clear about their expectations on quality and standards early in the planning process.
13. Para 256's statement that Design is an important consideration and planning permission may be refused, and the refusal defended at appeal or local review, solely on design grounds.

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What doesn't work?

1. The Sustainable Development section in SPP includes the statement in para 39 that new development should: consider the lifecycle of development- this doesn't work in the sense that there needs to be a mechanism to enforce/ require this. This is linked with Para 110 in the Historic Environment section which recognises the unique quality of historic environments which contribute to sustainable development through the energy and material invested in buildings, and again needs beefing up.

2. The statement in Para 256 of the Outcomes Section of the existing SPP's statement that the Scottish Government's policy on design is explained in Designing Places and Designing Streets is a very important one. However, by itself this statement 'doesn't work' and there needs to be in addition a better mechanism for ensuring Local Authorities actually follow this policy.

Why? See above

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

1. Para 113's statement that there is a presumption against demolition or other works that will adversely affect a listed building or its setting could be strengthened to emphasise the assistance this presumption against demolition gives to placemaking.

2. Para 111's statement that in some cases, the importance of the heritage asset is such that change may be difficult or may not be possible is a very important one including to the topic of placemaking, to which reference could usefully be added here.