



Historic Scotland Corporate Plan 2012-2015 Consultation Response Form

Your Details

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Signature				Date	02 November 2011

If you are submitting this form electronically and unable to include an electronic signature, by ticking this box you are confirming that you are the person detailed above.

(double-click box to edit)

Returning Your Response

By Email denise.mattison@scotland.gsi.gov.uk

By Post Historic Scotland, Longmore House, Salisbury Place, Edinburgh EH9 1SH

The closing date for responses is **16th November 2011**

For more information

If you have any questions about the consultation paper or accompanying documents, please contact Denise Mattison by phoning 0131 668 8742 or by email at the above address.

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Ref:

Acknowledged:

Q1 Do you agree with our vision for the historic environment?

Yes No

1. This section does should include a strong reference to Historic Scotland's important role in safeguarding and promoting the historic environment.
2. Part of HS's role and vision should be about maintaining standards across the country – having a national overview even where certain regulatory functions have been devolved, so as to ensure uniformity of standards; this needs highlighting.
3. IHBC would make the following suggested amendments & comment on the Vision paragraph:
"Our Vision is of a well protected, managed, ~~well-understood~~ and appreciated historic environment. We believe that the historic environment should be protected shared and enjoyed by all, make a significant economic contribution, and be handed on with pride and confidence to the next generation. *We are already leading the historic environment in the delivery of a number of outcomes and have achieved a great deal.* However, we believe that the historic environment can deliver so much more." The italicised sentence needs to be made clearer.
4. Referring on the lists on Page 7 under each Strategic Vision we consider that whilst these *are* aspirations for activity, they are *not* 'outcomes' as also stated at bottom of page 6 – as many of the points are actions that do not have definable or measurable targets. Particular comments follow:
Under Championing HE, the 3rd point we believe should be amended to read:
"Growing understanding and appreciation of the value of the historic environment through ~~optimising public access to the most significant buildings and sites.~~"
As stated, IHBC considers this gives an unhelpful emphasis on only the best HE sites, which contrasts with Fiona Hyslop's statement in the foreword:
"We will reach out to communities, ensuring that people of all ages and socio-economic groups value and enjoy their local historic environment, from prehistoric sites or the local medieval kirk or castle, to our maritime and industrial heritage, to the run of traditional cottages that make up the main street, or the 1930s cinema."
Under Managing HE, the 1st and 2nd points we believe should be amended to read:
Increasing enjoyment of Scotland's urban and rural landscapes through ~~the~~ improving ~~the~~ condition of the historic environment
Regeneration of urban and rural areas through ~~efficient and proportionate planning and regulation, balancing development and conservation,~~ assisted by HS's management role for the HE and HS's grant giving program. *(suggested change will emphasise HS's main roles in regeneration, rather than what are roles of Planning Authorities)*
Under Supporting Transition to Low Carbon Economy (or maybe better just 'Promoting Sustainability'), the 1st point we believe should be amended to read: " Maximising the historic environment's contribution to a sustainable Scotland and Scotland's carbon reduction targets in particular through the retention, refurbishment and sustainable adaptation of existing buildings and the promotion of new skills and sustainable materials."

5. On Page 8, the 1st para of "Working toward the Vision" should be amended as follows by deleting the last phrase (it is unrealistic to consider that all business of HS can contribute to sustainable economic growth):
"Throughout this corporate planning period we will ensure that all current and proposed business of the agency is tested against its potential contribution to our Vision ~~and the Scottish Government's overall Purpose.~~"

6. On Page 8, the 3rd para should be amended as follows including by adding the following phrase:
"We will not be working alone. We will take the lead in managing the process required to deliver our Vision. We will act to enable and empower the private and voluntary sectors and other public bodies so that they undertake their crucial role in managing and conserving ~~the our~~ historic environment, alongside Historic Scotland's own roles."

Yes No

Q2 Do you agree generally with the ways we can contribute to Scotland's National Outcomes?

Comment:

1. The table on page 4 is of limited value without any key to list the national outcomes.
2. Policy framework: It would be useful to include on page 4, alongside the information on primary legislation, some information on the supporting policy framework.
3. The champion role (which does represent a change of ethos) could be more clearly articulated to explain how Historic Scotland's functions ensure effective protection of the historic environment, within the context of the Government's primary focus on economic growth.
4. The historic environment offers unique opportunities for sustainable growth – the Corporate Plan could usefully highlight this potential more.

Q3 Looking ahead, what do you consider to be the major challenges for the historic environment that our Plan can help to address?

Comment:

1. Economic situation resulting in reduced investment, and pressure to secure short term gains impacting negatively on long term outcomes.
2. Impact of public sector on voluntary/private sector (for example how will Historic Scotland's planned growth impact on others in the sector?).
3. Buildings At Risk – increasingly vulnerable?
4. Delegation of decision-making on B listed buildings to Local Authorities against backdrop of diminishing Local Authority capacity to ensure quality decision-making on these assets.
5. Less resources for HS to input to Planning Authorities and assist quality decision-making on C listed buildings.
6. Consistent decision making/ application of policy across LA's in a time of LA cutbacks and HS/ Sc Govt seeking to 'simplify the landscape' / pass more responsibility to LA's.
7. Unfettered development as red tape is cut to stimulate growth and allow development at too great a cost to the historic environment.
8. Potential future dilution of national policy on the historic environment.

Q4 Are there any key areas relating to Historic Scotland's impact on stakeholder's business interests that should be considered in our Plan?

1. *Mediation role*: There may be opportunity for Historic Scotland to undertake a mediating role with other authorities (for example building regulation, fire) to help develop practical, sympathetic approaches to applying regulation, to ensure sustainable development of historic buildings. This might be one way in which Historic Scotland could champion the historic environment with other

authorities, owners and the general public alike.

Q5 Do you have any comments on the commitments we have identified so far?

Yes No

No.	Priority	Comment
1	A2	Amend as follows: “work to improve the condition of the historic environment, including reducing the <u>total</u> number of historic buildings at risk, <u>of all categories</u> ”
2	A3	IHBC particularly welcomes this commitment on traditional skills
3	A5	The 2 nd phrase of this commitment does not make sense and should be deleted or clarified: “act on Christie Commission recommendations on prevention, exploring the scope for using education and outreach as the primary means by which we manage all aspects of the historic environment”
4	A7	Needs clarification: widen the range of Scottish people who enjoy the benefits of our <u>Historic Scotland's</u> sites and the historic environment <u>generally</u> through reviewing our pricing policy, marketing activity and how we work with our partners”
5	A11	This commitment is totally unclear and needs clarifying or deleting
6	B2	This commitment we think should be deleted as this is the role of Planning Authorities: “ balance the needs within the planning system of new development and the historic character of urban and rural landscapes”
7	<u>B9</u>	Under this section we consider a commitment should be added relating to HS’s grants program, eg: <u>“Continue to maximise the support HS is able to give to the regeneration of historic areas through HS grant programs.”</u>
8	C1	IHBC has a major concern and objection to the wording of C1 as stated, as the primary role of protection of the overall HE should be included in HS’s 1 st commitment under the Management Priority. We suggest re-wording as follows to address our concern: “carry out a fundamental, evidence-based review of the Scottish Historic Environment Policy and legislation to ensure it supports delivery of the Scottish Government’s <u>commitments to both the historic environment and the economy</u> Economic Strategy and the National Performance Framework”
9	C6	IHBC request amendment to read: “continue to <u>help</u> improve the condition of the historic environment <u>and contribute to regeneration</u> through our grants programme, taking account of the wider goals of sustainable economic growth ”
10	C9	The current wording “ look at” needs to be made revised and made clearer as to what is the actual commitment wrt community ownership that is being made
11	C10	IHBC request amendment for greater clarity, and deleting reference to assumed fewer resources for the HE, as follows to read: “work with our partners <u>including in local government</u> to ensure access to <u>the full level of</u> expertise they require in locally managing the historic environment with fewer resources ”

Q6 Are there any other strategic priorities, outcomes or key commitments that should be considered?

Yes No

Suggested priorities

1. greater emphasis needs to be given to Historic Scotland’s *safeguarding and regulatory role* on the historic environment.

Plan

Q7 Are there areas that you think are important and that are not covered by the draft Plan? Yes No

If yes, please detail

1. greater emphasis needs to be given to Historic Scotland's *safeguarding and regulatory role* on the historic environment.
2. IHBC would like to see a greater commitment to Historic Scotland's *grant giving* activity stated in the Plan
3. We would suggest that the statistics on page 4 be expanded to also include some that reveal the pressures on the historic environment, eg the no. of listed buildings lost last year; the no. of applications for LB demolition; the no. of Buildings at Risk (by category).
4. Page 4 penultimate para should be amended to include reference to [protection of the historic environment, support and advice to LA's and the voluntary sector](#), and [a wider education role](#).

Q8 Are there any equality or accessibility issues that should be reflected in our Plan? Yes No

If yes, please detail:

We consider that Historic Scotland should have a policy on Access to Historic Scotland Properties for All, including those with disabilities, and that this should be at least referred to and referenced in the Corporate Plan.

Q9 Do you agree with the results of the environmental assessment and have the key issues associated with the environmental implications of the draft Plan been identified? Yes No

Q10 [Organisations only] Is your organisation willing to sign up to the delivery of the priorities for action and, if so, what does your organisation intend to contribute? Yes No

IHBC supports, subject to the detailed comments made in this Consultation Response, the general Strategic Priorities (1-4) of Historic Scotland's Corporate Plan and considers that, through our membership and as an organisation, we would be assisting in the delivery of the majority of the Aspirations included in

the Plan.

Additional comments

1. Throughout the Plan there is confusion between HS's estate and the overall historic environment, which needs clarified. Also, use of the term 'our' should be replaced by either 'Scotland's' or 'Historic Scotland's'
2. Page 3 below bullets amend as follows: A sensitively managed ~~and protected~~ historic environment benefits **every** person in Scotland. The historic environment provides a variety of services that are beneficial to the economy, society, health, education and recreation. It is therefore as vital as ever that we preserve the ~~most culturally~~ significant features of our historic environment
3. Page 4 below table amend to read: Historic Scotland's role is to act as leader and enabler to ensure that the historic environment ~~is protected and managed to~~ delivers ~~environmental~~, economic and socio-cultural ~~and environmental~~ benefits for Scotland.
4. Page 4 penultimate para amend to read: Our people are our key resource with 1,100 staff distributed widely across Scotland delivering a broad remit covering tourism, ~~property management, protection of the historic environment, support and advice to LA's and the voluntary sector,~~ construction and development, and ~~a wider education role.~~
5. Page 5 make amendments to bulleted section as follows:
Our resources will enable us: 1st bullet meaning of 'additional' apprentices is unclear; 2nd bullet typo "~~by~~ laser scanning"
 Next para "set even higher standards" is unclear
 Last set of Bullet Points: amend 2nd and 4th bullets as follows:
~~becoming ever clearer about what we are trying to achieve and~~ testing everything we do and spend, all our priorities and policies, against ~~a clear Vision that is set out in~~ this Plan working even more closely with our partners in the historic environment sector, local government and elsewhere to try to reduce unnecessary duplication ~~and simplify the landscape.~~
6. We do not feel able to make much comment on Page 11's section on Implementing the Plan and Monitoring Success, as there is no detail supplied on how it is proposed this will be done; however we would comment that a review of progress against the Corporate Plan 3 times per year does seem too frequent.

Important – how do you want us to handle your response?

Freedom of Information (Scotland) Act 2002, Environmental Information (Scotland) Regulations 2004 and Data Protection Act 1998

Your comments will inform the preparation of the finalised Historic Scotland Corporate Plan. The information you provide, including personal details, will be recorded by Historic Scotland. This will be used to send you notification and updates in relation to the consultation paper and will be retained on a database for approximately five years.

Following consultation, a report containing a summary of all the responses, which may include your personal details, will be published on our website. Copies of the responses will be available to the public on request. We will assume that you agree to your response being made public, but shall endeavour to withhold your personal data from the public domain. If you do not wish your personal data to be made publicly available, please tick the box below and we will redact or omit your personal data if your response is requested. However you should be aware that Historic Scotland is subject to the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004, and we will have to consider any requests to see full responses made under the terms of this legislation, regardless of whether or not respondents have asked for their personal data to be treated as confidential.

Do you agree to your response being made available to the public? **Yes** **No**

(made available in Historic Scotland/The Scottish Government library and/or websites)

Where confidentiality is not requested, we will make your responses available to the public on the following basis. Please tick **ONE** of the following boxes

Yes, make my response, name and address all available

Yes, make my response available, but not my name and address

Yes, make my response available, but not my address

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you have mentioned. They may wish to contact you again in the future, but we require your permission to do so.

Are you content for Historic Scotland/The Scottish Government to **Yes** **No**

contact you again in relation to this consultation exercise?