

## Response ID ANON-VZHT-9YC6-Q

Submitted to Consultation for Scotland's new historic environment strategy  
Submitted on 2023-02-18 10:35:30

### Introduction

1 Do you consent to to our GDPR statement?

Yes I consent to this GDPR statement

Are you responding as an individual or organisation?

2 Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation

3 Please enter the first part of the postcode belonging to you/your organisation, e.g. EH1.

Postcode text box:

EH3

4 Which areas of the historic environment sector is your organisation/ are you involved with? Please select all that apply.

Education, training and life-long learning, Built Heritage, including historic buildings, monuments and industrial heritage sites, Natural heritage (including landscapes), Traditional building skills, Traditional building materials, Planning system, Urban and rural development

Text box for other:

### About you

5 Which of the following are you responding on behalf of? Please select one option only.

Charity or third sector organisation with a heritage purpose (not for profit)

Text box for other response:

6 Which areas do you or your organisation work in? Please select one. (Please tick not applicable if this question does not apply to you)

Scotland wide- e.g. you/your organisation are based in and/or operate across Scotland

7 If you are responding as someone who works in the historic environment sector, what size is the organisation you work for? This includes paid employees and volunteers. (Please tick not applicable if this question does not apply to you)

headcount less than 250

### Demographic questions

8 Please let us know if any of the below apply to you.

9 What is your age?

age in number:

10 How would you describe your race and/ or ethnicity?

How would you describe your race and/ or ethnicity?:

11 What religion, religious denomination or body do you belong to?

Not Answered

If other, please describe here:

12 How do you describe your gender?

Not Answered

If other, please describe here:

13 Which of the following best describes your sexual orientation?

Not Answered

If other, please describe here:

## Our shared mission and principles

14 Our aim is for this strategy to support prioritisation, and to help realise the value of the historic environment. We have drafted the statement below with this in mind. Do you support this mission statement? Please use the text box to explain what you like about it or what you would change. You do not have to choose a response option to comment in the text box.

Yes I support this mission statement.

Text box to explain answer:

IHBC (Institute of Historic Building Conservation) asks that the second "our" be deleted. "To the benefit of society" is well understood, and to refer to "our society" suggests that there is another society out there that is not ours. "Potential" might be more easily defended than the word "power", which might be considered by some to be wishful thinking. Yet we recognise the nod to the influential "Power of Place" publication produced by English Heritage and on balance support this mission.

15 These are the six principles that have been identified in feedback from the engagement workshops. Do you agree with them? Please use the text box to explain what you like about them or what you would change. You do not have to choose a response option to comment in the text box.

Priority matrix agree/disagree - We must put people at the heart of this strategy:

Not sure

Priority matrix agree/disagree - We must face the climate and biodiversity crises:

Not sure

Priority matrix agree/disagree - We must care for, and protect, our heritage assets:

Yes I agree

Priority matrix agree/disagree - We must work collaboratively across sectors:

Not sure

Priority matrix agree/disagree - We must be prepared to make difficult decisions:

Yes I agree

Priority matrix agree/disagree - We must make inclusive and transparent decisions:

Not sure

Please add any comments on principles here:

The Conservation principles that are best recognised in the conservation sector are those enshrined in the Burra Charter (ICOMOS Australia, periodically updated and illustrated), the rather dated Venice Charter (ICOMOS) and still there is the clarion call in the SPAB manifesto (against restoration, for example). The draft principles will not find a distinguished place beside them, or even if put beside Our Place in Time. The principles might reference aesthetic, historical, evidential and communal values, as set out here: [https://www.designingbuildings.co.uk/wiki/Principles\\_of\\_conservation](https://www.designingbuildings.co.uk/wiki/Principles_of_conservation)

The strategy could better communicate the historic environment's positive contribution to the economy, wellbeing and net zero, giving examples drawn from regular day to day activities by people in our sector, such as members of IHBC. The Strategy makes assumptions that all readers will understand these contributions, but they go unsaid.

Understanding, learning from, and documenting the historic environment is absent. We protect and alter the historic environment, and learn from it to inform future policy. So an additional principle could be proposed:

'We aim to understand, investigate and record the historic environment, and support others who do this.'

We suggest that 'We must be prepared to make difficult decisions' and 'We must make inclusive and transparent decisions' could be combined as one principle: 'We are prepared to make difficult decisions that are inclusive and transparent'

Some of this difficult decision-making might involve resolving real and apparent conflict between energy conservation and building conservation, for example. A Strategy that gives the former Priority number 1, and the latter no priority at all, loads the dice against the historic environment. IHBC sets out ways of balancing difficult decisions at 3.1 here. <https://ihbconline.co.uk/CPPP/3/>

In sum the draft principles are not exceptional, and are to be expected of any public body. They offer no guidance whatsoever.

## Our priorities, outcomes and actions

16 We have identified three key priorities as the focus for delivery over the next five years. Do you agree with them? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

Priorities, do you agree - Enabling the transition to net zero:

Yes I agree with this

Priorities, do you agree - Empowering vibrant, resilient, and inclusive communities and places:

Yes I agree with this

Priorities, do you agree - Building a wellbeing economy:

Don't know

Please add any comments on priorities here::

This steps away from the 'understand, protect, value' priorities that used to cover every action delivered in managing the historic environment. If the priorities of net zero, empowering communities and places and a wellbeing economy were indeed to exclude or trump other actions, a lot of the work done by our members and other groupings will be undermined. But in the spirit of co-operation:

1. To enable the transition to net zero -yes, understanding the whole life of buildings from construction to demolition is fundamental to this, not just performance in use.
2. To empower vibrant, resilient, inclusive communities and places – yes, omitting the second “and”. Places connect to communities of interest and of locale.
3. To build a well-being economy- we do not think the meaning of this term is well understood. IHBC suggests instead a priority to understand and conserve heritage/ the historic environment while enabling economic growth that is measured in ways other than GDP.

17 Each priority has a set of outcomes expressed as Key Performance Indicators (KPIs) associated with it. Do you agree with these KPIs? Please use the text box to explain your answer. You do not have to choose a response option to comment in the text box.

I do not agree with any of these KPIs

If you have comments on the KPIs, including new or different measures that could be used, please comment below::

No. The KPI are ambitious but in most cases impossible to measure. They would therefore be inadvisable to set as KPI that are doomed to fail. Yet several of the ideas are to be welcomed as aspirations for the sector and for the nation. Realistically a KPI can only be set for a single organisation with an objective and a budget to match. What needs to be delivered through soft indicators are measurable change, which happen due to a multiplicity of factors, and should be monitored through regular and (as IHBC Scotland Branch has previously argued) annual SHEA- the Scottish Historic Environment Audit. This unfortunately seems to be in suspended animation.

Having established that first person “we” is the entire sector, and/or the nation, it obviously can't be the case that the KPI divide nationally into those we (national institutions) are set, and those you (local people, assumed to have little agency) can implement. IHBC members occupy both camps.

KPI 1 – the matter of whole life energy costing, reflecting the embodied carbon that goes into new construction, and the lesser amount that goes into adaptation to buildings, and the carbon cost entailed in demolition of fabric (e.g. facadism) needs to be the fore in the strategy. That is how the existing historic environment in its broad sense pulls its weight, and that is the logic behind the “retro first” campaign- to make the case for keeping buildings instead of replacing them.

1.1 From what date is taken to be the baseline from which change may be measured? A 5-year period from 2023-2028 is likely to show little change, whereas one set decades earlier should show that climate mitigation measures have already delivered results, or if they have not, that to repeat them will have negligible effect.

Some data given on p7 is questionable, and the sheer number of designations might invite adverse criticism, in light of the cost of converting most of it to low carbon heating- how does that £6.6 billion compare to what might be needed for all homes, which similarly lack low-carbon heating in almost all cases?

1.2 (and 1.3, 1.5, 1.6, 1.12.1.13) a fabric first approach means putting the building first of all into good repair, fixing damp and leaky gutters, before then attempting to add insulation that may otherwise fail if not considered holistically. IHBC advocates a need to state more explicitly that traditional buildings need a different approach to insulation. This requires training and also requires EPC, SAP and funding regimes to be changed to reflect the performance of a well-maintained traditional building. Funding regimes require warranty systems which obstruct the use of most natural materials, despite their being green and more sustainable, will lead to failures and shorten the lives of buildings.

1.7 “Advocate to [UK] government for a VAT rebate on repair and maintenance”, is something that IHBC supports -see the All-Party Parliamentary Group's (APPG) first report 'The Value of Heritage' - however as the result is dependent on the whims of UK Treasury this is a performance indicator set up to fail: a Grampian condition in planning law circles that cannot be delivered by the party concerned. Equalising tax rates for work to existing and new-build homes may be a more realistic step forward, UK-wide. VAT is not calibrated to deliver social benefits. Tax intake would go up if the black economy were made less attractive to householders by a reduction.

KPI 2 -please establish what level of climate resilience planning exists at present, or at whenever the datum point is, or was, set in order to capture improvements already made.

2.4 Ensure heritage grant programmes can fund adaptation measures appropriate to the asset concerned. – no blanket wall insulation without considering the impact on building performance, and on users as well as aesthetics.

2.5 Traditional Buildings Health check: we support this initiative's move beyond pilot phases.

2.6 Please cut 'their', which after all means us too, to read “increase public understanding of climate change impacts through heritage”

2.7 Historic environment must mean the cultural/ human element of the environment, and is therefore rightly separated from natural capital accounts. Or just say “the environment” instead.

2.8 What is a climate adaptation plan, or indeed a carbon resilience plan, and how many of them already exist? Is there scope to include them into a conservation plan that might already exist for a building, or into a conservation area appraisal, in order to facilitate their roll out, rather than add another task to a large number of hard-pressed stakeholders?

KPI 3. IHBC had predicted and then observed the complete failure of past Green Deal schemes. We see a need for the teams of assessors and their very blunt EPC tools to be much more familiar with how traditional buildings perform if those mistakes are not to be repeated. The skills need not only be green but to be informed by heritage and traditional building morphology. Traditional building skills are fundamental in maintaining, repairing and upgrading buildings. The shortage of such skills inhibits a 'fabric first' approach.

3.4 IHBC qualifications as Members or Associates, and those at the start of the process (affiliates and supporters) are among the standards expected of professionally-employed staff in the heritage sector. There are also RIAS, RICS, ICE and other professional accrediting bodies to be considered at the core of those aligning with current and future needs. These bodies also deliver training tailored to their memberships. Academic provision also exists, but is

steadily eroding, so there is a possibility that graduates will be in short supply. On the other hand it would be worse to create an oversupply of qualified people without the job vacancies that they could fill.

3.10 the Traditional Buildings Fora are resources that can inform national policies, not only carrying out local delivery.

3.11 Where such skilled tradespeople cannot be found locally, can there be a reduction in the number of quotes to be obtained, or efforts supported and funded (e.g. by apprenticeships 3.8) to increase the pool of labour with those skillsets?

KPI 4 - resilience not only in business skills but across the wide range of heritage skills that are needed. Working, engaging, and relying on communities in decision making and asset management is demanding in the context of less grant funding, a squeeze on budgets and generally less resource available. Upskilling for retrofit and climate change solutions is highlighted in several KPIs (1,2 and 3 most notably) under slightly different guises. This is in the context of huge skills shortages even at a very basic level regarding traditional construction.

4.2 - Ensure grant programmes offer support to improve organisational skills and resilience. But will a requirement to report on an increasingly wide range of outcomes prove to be a burden on small organisations?

4.7 New national centres for skills and innovation- how many more of these can Scotland support? Should a KPI focus on outcomes, skilled people rather than multiplying training centres?

KPI 5.3 and 5.5 - Provide advice, guidance, and inspiration to enable communities to acquire and manage heritage assets. Communities of interest and of place may not be so well-resourced in the foreseeable future, never mind unforeseen events that will occur (witness CoVid). Supporting communities who want to take on assets opens them up to open ended commitments, so we suggest that supporting resilience in those organisations who already have those heritage assets will be cost-effective, and less of a drain on volunteers' stamina after the initial enthusiasm has long faded. The moral responsibility continues to rest with the organisation that passed on its burgh hall, library or ruined abbey - ongoing finance and expertise will never cease to be needed. Asset transfer is not an end in itself, and can't be reduced to numbers of the KPI sort.

5.4 and 5.6 - those diverse voices need to be facilitated, and paid, rather than a continued reliance on the same few individuals. They also need to be found in salaried positions inside heritage organisations.

5.7 ICH is an acronym almost calculated to drive away the people who could and should be engaged in skills and living heritage, terms that we recommend be used instead of intangible. Built heritage makes the untouchable more relevant, real/ tangible and is in need of actual skills.

5.8 under-represented communities include migrants and refugees whose built heritage may be international. Local stories are not just local- some of them should make global connections.

KPI 6. A child today is tomorrow's adult. When does that change take place in the case of the young people counted here? What is the baseline from which the number, and more importantly depth of participation, to be evaluated? Did the impact of that interaction with heritage have any lasting effect? Or is this KPI a diversion from the three priorities?

KPI 7 Public benefit. A regular and planned allocation of historic environment funds is proven (by numerous planning and architectural awards to for example the Fraserburgh CARS) to be better directed than short-term headline-grabbing sums aimed at a particular place.

Funding panels need to be fully on board in supporting place-based outcomes that value the heritage of those places. Architectural quality is one of the arguments for retention to be aligned with place-based aims, but the climate crisis means that the case for use and re-use of existing fabric applies also to non-designated and little-appreciated buildings because of the embodied carbon they contain.

KPI 8. Imported material, such as stone from India and China, might undercut more local products through exploitation of unfair work practices, and this should be a consideration in allocation of contracts and grants. We are not aware that jobs that are counted in the sector in the UK do not meet fair work practice, but it is possible that the black economy fostered by VAT avoidance does experience an element of such exploitation. It will be difficult to measure an increase from 100%.

KPI 9. Historic assets reinforce a sense of place. This benefits identity, health and wellbeing. The worst performing deciles in SIMD data are often places that have a poor self-image. Research by two of our IHBC Members, in Glasgow and across Scotland, has found that conservation areas are not uniformly distributed across all deciles (blocks of 10%). It is possible that some of the more long-standing conservation areas perform better because they self-police to an extent, and lift themselves up. Other conservation areas have received public investment in the past 20 years because of inbuilt relative socio-economic disadvantages, so it would be useful to review whether that investment had beneficial impact.

Health outcomes will only be demonstrable over decades, or even lifetimes.

9.3 The historic environment is, it might be argued, over reliant on volunteer work. The prospect of building experience for a career in heritage, or in retrofit, might encourage greater engagement in schemes like Make your Mark.

18 Under each KPI, we have set out the actions we might take at national level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

I do not agree with any of these actions

Text box for alternative actions:

We do agree many of the aspirations but as KPI they are not measurable. A multiplicity of factors might influence outcomes, that cannot be judged as a performance by any body.

It is debatable who might be encompassed in the "Nationally, we" and "Locally, you". KPI for Historic Environment Scotland, National Trust for Scotland etc belong in the relevant corporate plans, not here, for assessing performance by each public body.

Day-to-day management of the historic environment, local and national, needs to be evidenced in order that those who deliver that can support the mission. If it's not counted, it doesn't count, and that is why SHEA needs to be reactivated as a source of data that can be used to monitor change. It absolutely should not generate further KPI which once they are targets that must be hit, are meaningless as bell-weather.

19 Under each KPI, we have set out the actions we might take at a local (regional) level to deliver our mission. Do you think these actions are the right ones to deliver against the KPI? Can you suggest alternatives?

I do not agree with any of these actions

text box for local delivery comments:

The KPI at local level often stray away from heritage sector-specific issues and therefore are not capable of being delivered by the sector. A multiplicity of factors might influence outcomes.

It is not clear who is encompassed in the "Nationally, we" and "Locally, you".

Day-to-day management of the historic environment, local and national, needs to be evidenced in order that those who deliver that can support the mission. If its not counted, it doesn't count, and that is why SHEA needs to be reactivated as a source of data that can be used to monitor change. It absolutely should not generate further KPI which once they are targets that must be hit, are meaning less as bell-weather.

20 What structures and mechanisms are needed to oversee successful delivery of the new historic environment strategy?

Text box to explain answer:

Existing structures and bodies need resources. If every organisation were shoe-horned into some different arrangement for delivery, those resources will be still further stretched. However mechanisms allowing cross-fertilisation of ideas, such as BEFS, will enable delivery. There will need to be vertical connections, from national to local, "us" to "you", as well as horizontal linkages.

Local delivery should not be downplayed but outcomes are difficult to measure.

A very useful mechanism would be a carbon calculator tool, free of charge (so not ICE), that would enable calculation of embodied energy sunk into existing buildings and structures, and that which would be entailed in constructing new buildings of various types. These exist in USA.

A glossary of terms might make the strategy more understandable, and occasionally turned to for reference.

There will need to be a pause halfway through the term of the strategy to identify gaps not yet filled, and those parts of the strategy that by then have been successfully delivered.

21 Participants attending the engagement workshops asked for regional opportunities and mechanisms to help deliver the strategy. Do you have suggestions for how a regional approach to delivery might work?

Text box for regional deliver mechanisms:

No because that would deny a voice to localism, and limit access to the benefits that local exemplars bring to the national picture. The old regional councils are no longer applicable now that Scotland has single-tier authorities. City Regions are not the best model and can't roll out across all of rural Scotland. We are aware that some local authorities pool archaeological services because they are unable to resource such a service specific to each local authority. Some of these are more or less similar to the regional planning services that served regional councils, but now there will always be some local authorities who do not align. That problem is avoided in the case of professional staff who handle the 1997 Planning (Listed Building and Conservation Areas) (Scotland) Act because their work is so much more closely tied into planning decisions made by their own Planning Authorities. Their network is COG, and more broadly, IHBC at a national Scotland level and which may meet in varied locations to avoid excessive centralisation.

Now that online connectivity is par for the course, the players involved know each other Scotland-wide so the benefits of instituting a regional structure are limited. They might come together informally at one place or another but there are not so many of us that regional subdivision works.

22 If applicable, what role would you like to have in delivering the strategy? An example of a role could be taking part in a steering group overseeing delivery of the strategy or taking part in a working group that delivers to a particular priority.

role in delivering the strategy:

IHBC will be pleased to contribute to working groups. For example, we were represented in the OPiT working group on Climate Change which published its report in Glasgow in 2018. Climate Change has not abated as a priority even after Cop26 and we think it likely that it will continue to be a focus for attention. Other topics - regeneration, place-specific conservation, regulatory, legislation (should any further change be promoted) - might also suit the skills of our membership if they are in prospect.

Local Authorities (at officer level, not CEO) need to be involved in the delivery working groups, or whatever model is proposed for delivery. They need to be involved in setting the Actions so that those actions that are the responsibility of Local Authorities are realistic and deliverable.

Our membership reaches across the sector and has much to offer.

## Impact Assessments

23 What impact do you think the strategy might have on people with protected characteristics? Please add any comments in the text box below.

Impact on protected characteristics - Age:

Impact on protected characteristics - Sex:

Impact on protected characteristics - Sexual orientation:

Impact on protected characteristics - Gender reassignment:

Impact on protected characteristics - Disability and long-term conditions:

Impact on protected characteristics - Race:

Impact on protected characteristics - Pregnancy and maternity:

Impact on protected characteristics - Marriage and civil partnerships:

How will this effect EDI text box:

No opinion

24 What impact do you think the strategy might have on the competitiveness of Scottish businesses, the third sector or the regulatory context? Please add any comments in the text box below.

Not Answered

Text box will this impact businesses or 3rd sector:

Don't know

25 What impact do you think the strategy might have on people in island communities? Please add any comments in the text box below.

Not Answered

Text box to describe impact on island communities:

Don't know

26a Has our environmental assessment identified the likely environmental effects of the options?

Not Answered

26b Do you think there are any additional environmental mitigation, enhancement, or monitoring measures that should be considered?

Not Answered

26c Do you have any other comments on the environmental assessment? If so please comment below.

Text box for other environmental assessment comments:

No

## Final comments and follow ups

27 Do you have any final comments on the draft strategy?

final comments text box:

IHBC welcomes the opportunity to give input to the strategy for the Historic Environment. It is still our place in time to do so.

In conclusion it is of course easier to critic than to create, but the writers of the strategy clearly have some work to do to win sectoral support from within the historic environment sector, and beyond. On the plus side, we think that the 69% of people who think that the heritage of their local area is well cared for (p7) are giving an extraordinary vote of confidence to the historic environment sector, its people and organisations. That should not be prefixed by "but only," but is cause for celebration.

PS please delete "and their estates" from p16. Not every private owner has one.

28 Do you want us to follow up with you about this consultation? If yes, please include your email address. We will only use it for the purposes of contacting you about this consultation and any relevant follow up activities.

Yes, I am happy to be contacted in future about this consultation

Email address for consultation follow up:

scotland@ihbc.org.uk

29 Would you be interested in taking part in a survey that seeks to understand the impact of the cost crisis for the historic environment sector? If so, please provide your email address.

No

Email address for cost crisis survey: