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Richard Cartwright
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Dear Sirs,

CONSULTATION ON THE NATIONAL PLANNING FRAMEWORK 2: DISCUSSION DRAFT

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The Scottish Branch of the Institute welcomes the opportunity to comment on this discussion draft National Planning Framework, and has the following comments to make on the document.

On a general level, whilst the Institute recognises that this is a framework document for the whole of planning, we are alarmed at the sparsity of references to the historic environment, to conservation of the built environment, and to the importance of promoting good design universally but including specifically within and alongside the nation's recognised heritage buildings and areas.

Particular comments on statements made within the document are set out below under the appropriate section headings of the Framework:

Tourism

Paragraph 36 on the importance of tourism should be amended in its penultimate sentence to state: "Many visitors are attracted by Scotland's strong cultural heritage and rich natural and built heritage environments."

Economic Strategy Objectives

Paragraph 78's 5 objectives include making Scotland greener and this is defined as "improve the natural and built environment and the sustainable use and enjoyment of it". We suggest that 'improve' should be replaced by 'preserve or enhance' and that the phrase 'natural and built environment' should be replaced by 'existing high quality natural and built heritage environments'
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Importance of Place

Paragraph 79 states: “Well-qualified, creative people are attracted toa stimulating environment, Successful places have strong, positive identities.... The environmental quality, built heritage and cultural life of Scotland’s cities and towns are therefore strong economic assets and planning policies must place emphasis on promoting their quality”

Whilst the Institute supports these statements including the specific reference to ‘built heritage’ we would suggest that rather than merely ‘promote’ these assets, the last sentence should be re-written to say planning policies should also ‘protect and enhance’ these assets.

Regeneration

Paragraph 101 states: “Realising the potential of ...places is at the heart of the Scottish Government’s approach to regeneration. Successful regeneration demands a combination of economic development, housing and environmental investment,, a commitment to environmental quality and good design; and respect for local identity and the historic features which contribute to it.”

The Institute welcomes these statements.

Spatial Development Strategy

Paragraph 141 sets out one of the key aims as:” to promote a greener Scotland by contributing to the achievement of climate change targets and protecting and enhancing the quality of the natural and built environments”

This Institute suggests that the phrase ‘quality of the natural and built environments’ should be replaced by ‘existing high quality natural and built heritage environments’

A Greener Scotland

Paragraph 146 states that: “Realising the vision set out in this framework will require a strong commitment to protecting and enhancing the natural, built and cultural environments, which are essential components of our quality of life and unique economic assets. Planning has an important role to play in managing the environment, for example by *protecting sites designated for their natural heritage value, safeguarding and enhancing urban and rural biodiversity, contributing to the improvement of water, air and soil quality, and ensuring that new development does not result in the loss of landscape quality or the erosion of cultural heritage and identity.*”

The Institute supports the first sentence above but considers that the role of Planning in managing the environment, as set out in the second sentence above, should be expanded to include the roles of preserving or enhancing the built heritage environment and promoting good design.

Development Strategy

Paragraph 150 on development strategy lists the main elements of the spatial strategy as including: *conserve and enhance Scotland’s distinctive natural and cultural heritage;*

The Institute suggests this be rephrased to say:

‘protect and enhance Scotland’s distinctive natural, cultural and built heritage’

Adapting the Built Environment

Paragraph 175 states: “The application of appropriate planning and building design policies can achieve more sustainable urban forms and much higher energy efficiency and emission standards in new development” and

“It is important that the pursuit of global environmental objectives does not undermine locally valued features of the environment. Our built heritage, including urban conservation areas, will need sensitive treatment.”

The Institute welcomes the second quotation above but would urge that paragraph 175 be expanded to include reference to the benefits of retaining existing built heritage assets, both for their physical merits but also as part of a strategy to promote an overall more energy efficient approach. The expanded text should note that it is grossly energy inefficient to demolish historic buildings which are worthy of retention and continued, adapted use, and replace them with redevelopment.

The Scottish Branch of the Institute would be grateful if you could consider these points in the revisions to be made to this important National Planning Framework document for the final version.

Yours sincerely,

Richard Cartwright
Scottish Consultations Secretary
Institute of Historic Building Conservation