

Response ID ANON-VB35-UVHX-B

Submitted to **Developing an Environment Strategy for Scotland**

Submitted on **2018-08-15 10:00:57**

Questions

1 What are your views on the following draft vision for Scotland's environment and climate change policies?

What are your views on the following draft vision for Scotland's environment and climate change policies?:

We strongly recommend that the developing Environment Strategy for Scotland adopts a broad definition of 'the environment' that includes the historic environment. As it stands the vision has a very narrow focus and should recognise the effect people have on their environment. Natural and cultural aspects of the environment are inextricably linked and the historic environment is a product of these interactions over time.

Our historic environment makes a significant contribution to the quality of Scotland's environment and we note and welcome that some of these connections have been made in brief in the discussion paper and draft knowledge accounts which provide the baseline for the strategy. We would suggest that a more holistic approach is taken in defining the environment which recognises the historic environment as part of 'the environment' and acknowledges its role in supporting the delivery of the strategy. We would be happy to participate in its development to ensure that the historic environment is more fully recognised and to ensure that an understanding of what heritage can deliver in relation to sustainable development – that is across the range of social, environmental and economic objectives - is captured more fully.

The historic environment is defined as '...the physical evidence for human activity that connects people with place, linked with the associations we can see, feel and understand' (source: Our Place in Time). It includes the aspects designated for their importance such as Scotland's six world heritage sites (WHS), over 8,000 scheduled monuments, around 47,000 listed buildings, approximately 377 sites on the Inventory of gardens and designed landscapes and the 39 sites on the Inventory of historic battlefields. In addition there are also over 300,000 undesignated historic assets, many of which survive in the soil matrix and/or form part of the historic environment's significant contribution to Scotland's landscapes. This comprises but is not limited to such historic features as field systems, traditional buildings, plantations, landscapes largely produced by past land management practices and places with significant cultural associations. It is important to emphasise that historic environment assets are non-renewable and once lost, are lost forever.

Our Place in Time (OPiT), the historic environment strategy for Scotland, also forms part of the context for the developing Environment Strategy and should be referenced and acknowledged as part of the context for this strategy as it develops. OPiT highlights that the historic environment is a critically important and ultimately sustainable resource for the people of Scotland and there are many ways in which it contributes today to a flourishing, healthy, and dynamic country. The historic environment also makes a significant contribution to the delivery of a number of the strategies listed in the introduction to the discussion paper. It also makes a significant contribution to our identity and sense of place, well-being and economy. It has the potential to support the delivery of the 'one planet prosperity' vision set out in the discussion paper and is a cross-cutting asset that has the potential to deliver across the full range of the Scottish Government's National Outcomes and Sustainable Development Goals identified in Annex A.

We note the discussion of environment and climate change priorities which are included in the EU-UK negotiations in box 1 in the discussion paper. Whilst we welcome acknowledgement of the priority to 'maintain funding for environmental outcomes at least at current EU levels' we would like to highlight that monetary aspects are not the sole value of such agreements but the partnerships they create. Therefore, as the strategy develops, we would suggest that it will be critical to be able to continue partnering in EU funded projects. For example, many of our climate change related projects have been supported by EU funds and this multi-national, collaborative approach to shared problems has allowed us to deliver our statutory responsibilities in relation to climate change and some examples of these are provided under the climate change policy question below.

We welcome the commitment to use the four EU environmental principles as the basis for the strategy. These principles are central to the work of Historic Environment Scotland. In general terms, Historic Environment Scotland's Policy Statement (HESPS) broadly identifies that the historic environment should be managed in line with a number of these principles. Actions taken in respect of Scotland's historic environment, for example, are to secure its conservation and management for the benefit and enjoyment of present and future generations. In addition, there is also a presumption in favour of the preservation of heritage assets.

For example, the precautionary principle is fundamental to our work in relation to the regulation and control of work to scheduled monuments. Such assets are recognised as being finite and non-renewable and they are often very fragile and vulnerable to damage or destruction. Where changes to such monuments are proposed, they are required to be carefully considered, based on good authority and properly planned and executed.

We welcome the stated aim of taking a whole-of-government approach to developing the environment strategy and would be happy to participate actively in this work. We would also welcome the opportunity to collaborate on mutual objectives. We currently work with a range of agencies on subjects such as landscape, forestry and the marine environment to integrate our approaches to the sustainable management of our resources. We would strongly welcome further opportunities to work in these and other areas, to develop and strengthen our existing working relationships across government to assist with the development and implementation of an Environment Strategy for Scotland.

2 What are your views on the following draft outcomes that will help to achieve this vision?

What are your views on the following draft outcomes that will help to achieve this vision?:

In general, the draft outcomes are too narrowly focussed on the 'natural' environment. Today's environment is the result of the interaction of people with their surroundings over time and the historic aspects of our environment can deliver multiple benefits across a range of environmental, social and economic priorities. These issues are discussed in relation to the six outcomes identified in the discussion paper, below.

The historic environment is part of the environment and by adopting a broader definition this will help to ensure that it is also protected and where appropriate enhanced. This ties in with the Scottish Government's National Performance Framework. The national outcome for the environment states that we value, protect

and enhance our environment. This is supported by an indicator relating to the state of historic sites. Scotland's future Environment Strategy will be an essential strand in the delivery of this outcome.

We recommend that a suite of indicators is developed to monitor the operation of the policies within the strategy and that a range of indicators for the historic environment are included. We would be happy to assist in their development

1. We are a climate leader and play our full role in limiting global temperature rise to well below 2°C

Climate change presents a significant risk to the historic environment. Rising sea levels and increased storm events endanger historic landscapes, structures, buildings and archaeology. More frequent periods of intense rainfall will cause flooding and erosion to historic buildings and heritage sites.

Changes in vegetation patterns will threaten the visibility and integrity of archaeological remains and historic landscapes and endanger our biodiversity. The spread of new pests may harm our historic buildings, collections and designed landscapes.

Amongst our varied roles and responsibilities as lead public body for the historic environment, we are identified as a 'major player' in the Climate Change (Scotland) Act 2009. We carry out our duties in respect of this by implementing our Climate Change Action Plan 2012–2017 and to support this we carry out a range of activities such as research into energy efficiency improvements in a range of traditional building types and the impact of climate change and risks to the historic environment; including dissemination of information, and by providing guidance and training to stakeholders in the historic environment sector.

We are at the forefront of researching and understanding the historic environment and addressing the impact of climate change on its future. As part of this, we have recently published a study which represents the first step in a comprehensive and ongoing exercise to understand, monitor and manage environmental risk to our Estate. This study is part of ongoing work to develop best practice and integrate climate change actions into our operations, in line with the Public Bodies Duties under the Climate Change (Scotland) Act 2009 and Climate Ready Scotland: Scottish Climate Change Adaptation Programme.

In addition, we investigate and record architectural and archaeological sites and landscapes across Scotland. We also monitor the condition of nationally important scheduled monuments. We provide advice on the potential impacts of development on the historic environment to fulfill our role as a statutory consultee in the planning system and as a consultation body under the Environmental Impact Assessment regulations.

Finally for this outcome, we would advise that it should also take a broader view of how the effects of climate change can be limited and should include an aspiration to be a leader in climate change adaptation, as well as mitigation.

2. We are a zero waste, resource efficient nation

Historic buildings can make a significant contribution to the circular economy. Existing buildings should be considered as assets and a preference should be expressed for their continued use and reuse (including materials salvaged from necessary demolitions).

Almost half of controlled waste comes from the construction and demolition industries (source: Making Things Last). We advocate the retention/reuse of historic building stock and reuse of salvaged materials which can make a significant contribution to the circular economy and waste reduction.

3. Our biodiversity is protected and enhanced, supporting healthy ecosystems

Historic sites can be special for biodiversity as many have been protected from development, particularly agricultural improvement, which has allowed the preservation of local habitats and species. Historic sites can therefore be reservoirs of wildlife which can support conservation initiatives, with important local populations of plants and animals.

Larger sites and linear features, such as the Antonine Wall WHS, are important contributors to the wildlife corridors which allow plants and animals to migrate and spread as a result of pressure from development and climate change.

Protecting historic landscapes from both natural and human threats also supports biodiversity and allows the preservation of local habitats and species. We help to deliver the Scottish Biodiversity Strategy and produce a biodiversity report to highlight how many of our functions provide opportunities for supporting its improvement and understanding.

Although not fully addressed through ecosystems services approaches, the historic environment also has the potential to influence the benefits to the environment in a whole systems approach.

4. Our air, freshwater, seas and soils are of excellent quality

Scotland's soils provide a wide range of environmental, economic and societal benefits. This includes preserving cultural and archaeological heritage. This is set out in the Scottish Government's Soil Framework. Soil erosion was highlighted through Scotland's Climate Change Adaptation Programme as being an unmanaged risk. Many soils that act as carbon reservoirs are also key features of or are key to the preservation of the historic environment. We would be happy to provide further advice in order to demonstrate the benefits of preserving these soils.

The long-term preservation and management of Scotland's marine historic environment is one of the objectives that forms a measure of success for the delivery of the vision for 'clean, healthy, safe, productive, biologically diverse marine and coastal environments, managed to meet the long-term needs of people and nature' as part of Scotland's Marine Plan.

Coastal and submerged marine heritage assets also benefit the environment in a similar way to those on land. They help create a sense of place, well-being and identity and enhance the distinctiveness of the coast. If left undisturbed, submerged marine heritage assets such as shipwrecks can create long-term positive benefits for the wider marine environment, for example acting as artificial reefs supporting beneficial habitats for wildlife.

We are currently working with Marine Scotland, Scottish Natural Heritage and others to develop a network of Marine Protected Areas (MPA) in the seas around Scotland, including Nature Conservation MPAs, Historic MPAs, and Demonstration and Research MPAs. We support their view that areas designated for their natural and cultural interest are often interconnected and that developing the network provides opportunities to recognise and protect the full range of marine life as well as geology, undersea landforms and features of historical importance that make Scotland's seas great.

5. Everyone can access, enjoy and connect with nature

We would suggest that this is broadened out to read 'everyone can access, enjoy and connect with the environment', in line with our recommendation that the emerging Environment Strategy adopts a broader definition of 'the environment'. Evidence suggests that a well maintained environment contributes to wellbeing and quality of life. This is true for both the 'natural' and 'cultural' elements. For example 93% of adults agree that "when trying to improve local places it is worth saving their historic features" and 71% agree that they are "interested in the history of the place where I live" (Source: OPiT).

6. The global footprint of our consumption and production is sustainable

As a 'major player' we, and our predecessor body, Historic Scotland have been working towards the government's climate change targets in managing our consumption of resources more carefully. For example, Historic Scotland's Carbon Management Plan 2010-2015 resulted in a 17% carbon reduction across our estate (as at FY 2015/16) stemming from a range of actions including energy efficiency measures and fabric interventions, installation of smart meters, staff training etc. Since 2012 we have produced 23 Refurbishment Case Studies and 9 Technical papers (available online at www.historicenvironment.scot), most of which document energy efficiency upgrades through fabric improvements to a range of domestic and non-domestic traditional building types across Scotland.

We have also published guidance through our Short Guide series, including 'Fabric Improvements for Energy Efficiency in Traditional Buildings' (2013); 'Micro-renewables in the Historic Environment' (2014), 'Climate Change Adaptation for Traditional Buildings' (2016). A training programme has also been developed, focussed on up-skilling a range of stakeholders including building trades and professionals (including EST Home Energy Advisors) and through homeowner events in conjunction with Home Energy Scotland; this includes development and delivery of a formal SQA award in Energy Efficiency Measures for Traditional Buildings.

We would be happy to provide further information and advice on developing these objectives in relation to the historic environment.

3 What are your views on the draft knowledge accounts which will be used to help identify priorities for action in the coming years? What additional sources of key evidence can you add?

What are your views on the draft knowledge accounts [LINK] which will be used to help identify priorities for action in the coming years? What additional sources of key evidence can you add?:

In general we welcome the use of knowledge accounts as a means of identifying priorities for the implementation of the Environment Strategy, subject to a more holistic approach being taken to the definition of 'the environment' across the whole strategy. We note that some the connections between the natural and historic environment have been made in brief in the discussion paper and draft knowledge accounts but we believe that there are many more areas in which the historic environment could contribute to this knowledge base.

There are a number of connections between the topic areas and it will be important to ensure that there are clear cross-references between them and that a clear overview of all the accounts is taken. Without this, there is the potential for similar topic areas to identify competing or conflicting priorities and to leave significant evidence gaps in other areas.

In some areas there are 'key evidence gaps' such as the lack of coverage of the historic environment in the current system of natural capital accounting. We are able to provide a wide range of information that will help to identify trends, past and future drivers for change and on current interventions and their impact more fully. We would be happy to provide this information in respect of the following draft accounts.

Air quality – we welcome the recognition of the potential for the damage air pollution can cause to traditional buildings and monuments. Soils are an important cultural asset as well as being natural. Anything that impacts on soils has the potential to have an impact on buried archaeological remains and the palaeoenvironmental record which may be stored within them. This includes areas of peat and in lake sediments. HES is funding a range of research in these areas and we would be happy to provide further details.

Business and Household Resource Efficiency – adaptation and reuse of historic buildings is a key way of minimising waste during construction and keeping high-quality, locally sourced materials in the economy whilst protecting a key aspect of the historic environment. We have been carrying out a range of research in these areas as part of the implementation of our Climate Change Action Plan and we would be happy to provide further details.

Ecosystems and wildlife - the historic environment is relevant here as it is part of a healthy ecosystem, partly through the cultural services it provides and partly through historic assets and their condition as 'stocks'. These aspects are currently not well captured in ecosystems services or natural capital accounting approaches and we would suggest that this significant data gap is an area which stands to be addressed through further research as a priority. Protection of the historic environment is a specified outcome under the Agri-Environment Climate Scheme and we have provided comments to the Scottish Government's recent consultation on a new rural funding transition period and policy. We would welcome a more joined up approach being taken on this matter and would be happy to work with you on developing such research.

Natural Capital – the definition of the environmental resources which yield a flow of benefits to people should be expanded to include the historic environment. The historic environment is an asset which underpins our national identity and which contributes to our sense of place, quality of life, economy and well-being. The threats identified in the 'future drivers' header equally affect the historic environment, but currently the historic environment is not captured under natural capital accounting approaches. Research around incorporating it is ongoing with other UK natural and built heritage public bodies, and we are keen for Scotland to be involved in developing a baseline and set of indicators to better monitor and improve upon our broader environment in conjunction with increasing our natural capital.

As noted earlier, Historic Environment Scotland is a major player in terms of the Scottish Government's climate change legislation and we are developing a significant body of research on the risks posed to the historic environment by climate change and in findings ways to limit its impact. We have published a climate change risk assessment report which represents the first steps in the development of: (i) a current climate risk register for the HES Estate, and (ii) a methodology for assessing the impacts of climate change on heritage assets in the wider historic environment. Our baseline data and follow-on work here serves as an important piece of work within the field of heritage and climate change and should be included as a current initiative on the draft knowledge account.

In terms of the current initiatives identified in this draft knowledge account, it must be noted that the historic environment is also one of the environmental assets which is covered under the agri-environment climate scheme. We hold comprehensive data on the condition of scheduled monuments across Scotland and would be happy to share this with you.

Quality Green Space – we would suggest that the focus of this knowledge account is too narrow. Green spaces are an important component of the place-making, but are not created in isolation. This knowledge account should be about the way we make new and existing places into high quality places – which incorporates all elements of the environment including the green space, the built aspects and the historic aspects of those places. In order to ensure that places are sustainable, viable and positively impact on the health and well-being of those who live, visit and interact with them requires a holistic view of them rather than to look at just one aspect such as green space. The historic environment makes a significant contribution to character and sense of place and is valued by communities as an asset which makes a positive contribution to their area.

In terms of recent trends, Scotland's Historic Environment Audit (SHEA) reports that nine out of ten adults (89%) strongly agreed or tended to agree that "it is important to me that heritage buildings and places (important buildings, sites and monuments) are well looked after." People, Culture and Heritage, 2015.

Value the environment – The historic environment is explicitly value based and so we would suggest that the focus of this knowledge account is too narrowly focussed on what is considered 'natural' and would welcome a broadening of it to include the historic environment in the 'Where do we want to be?' outcome.

The historic environment is an asset which underpins our national identity and which contributes to our sense of place, quality of life, economy and well-being. A current initiative around this and the value people place on the historic environment is our 'What's Your Heritage?' project, over 2,000 people responded around what heritage means to them. The results of which are informing our policy guidance and how we advise, consult and designate the historic environment – more info can be found here. Our work with WYH? has reinforced our holistic approach to the environment as our engagement results have shown many do not distinguish between the natural and historic environment as two separate 'environments'.

We would also like to note that although 'wild land' is included as a consideration within decision-making in planning as set out in Scottish Planning Policy, that there is no truly wild land in Scotland. Our landscape is the product of the interaction of people with their surroundings over time. We would also note that this recognition is shared in part by Scottish Natural Heritage and the Forestry Commission Scotland who were are currently working with to developing approaches to managing landscape and environmental change that recognise the inter-connectedness of 'nature' and 'culture'.

Access to nature – We welcome acknowledgement of the importance of access to outdoor recreation and green spaces and are supportive of its aims under 'Future drivers' to break down barriers to access. Many of the reasons listed in 'Past drivers' for why people visit the outdoors are the same reasons why people visit the historic sites. In addition SHEA reports the finding that those who visited a historic site or archaeological place were over 50% more likely to report a high life satisfaction than those who did not, as reported in the Scottish Government's report Healthy Attendance. On this basis, we recommend that the scope of this knowledge account is broadened to include the historic environment.

Many sites we manage within more urban areas, such as Craigmillar Castle (Edinburgh) and Linlithgow Palace and Peel (West Lothian) offer large green spaces around them which are free to enjoy. A significant number of the sites we manage are located in rural areas and are free to enter. We would therefore like the knowledge account to be more indicative of the ways in which people can enjoy and connect with the environment around them, rather than being specific to 'nature'.

We welcome the account's acknowledgement of 'Scottish Historical Environment Policy' under current initiatives, but it is not clear what this refers to. In addition, the reference to specific aspects of Scottish Planning Policy (SPP) for open space and the place standard is unclear in this context. Policy for the historic environment is cross cutting and is relevant to the full range of knowledge accounts, as is SPP. We would be happy to provide further information on current and developing historic environment policies and strategies to inform the development of the Environment Strategy and the supporting knowledge accounts.

About you

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Historic Environment Scotland

The Scottish Government would like your permission to publish your response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this exercise?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this exercise?:

Very satisfied

Please enter comments here.: