



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

By email to: [climate.change@gov.scot](mailto:climate.change@gov.scot)

Ms Elaine McCall  
Spatial Planning, Policy and Environment  
The Scottish Government  
Victoria Quay  
EDINBURGH  
EH6 6QQ

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
Switchboard: 0131 668 8600  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our ref: AMN/23/122  
Our Case ID: 201605628  
Your ref: 01225 ENVIRONMENTAL  
REPORT  
16 March 2017

Dear Ms McCall

## **Environmental Assessment (Scotland) Act 2005 The Scottish Government - Climate Change Plan**

Thank you for your consultation which we received on 27 January about the draft Climate Change Plan and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the draft plan, with part two focusing upon the environmental assessment.

### **Draft Climate Change Plan. The draft third report on policies and proposals 2017 - 2032**

On the whole, whilst we welcome the overall ambition of the transformational outcomes set out in the draft RPP3, it is not clear how some of the ambitious targets set out in the draft plan are to be achieved and we consider that this would benefit from greater clarity in the final plan. Our detailed comments on these issues are set out in part 1 of the attached annex.

### **Environmental Report**

I consider that the assessment of predicted effects would have benefitted from a more robust approach to both the positive and negative effects of the draft climate change plan. There is the potential for positive and negative effects across all sectors identified in the plan and a number of these issues have been raised in our response to the draft plan in part 1 of the attached annex to this response. Our detailed comments on the part of the Environmental Report relating to the Draft Climate Change Plan are set out in part 2 of the attached annex.

None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity-building in SEA.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Adele Shaw and they can be contacted by phone on 0131 668 8758 or by email on [adele.shaw@hes.scot](mailto:adele.shaw@hes.scot).

Yours sincerely

**Historic Environment Scotland**

## Annex

### Part 1: Draft Climate Change Plan. The draft third report on policies and proposals 2017 - 2032

For ease of reference where we have comments to make, I have followed the headings set out in the draft plan.

#### Chapter 3 – A Collaborative Approach

We note that in chapter 3 the Scottish Government has set out the role of local government in tackling climate change, however the wider public sector including Non-Departmental Public Bodies such as Historic Environment Scotland gets little mention. The inset box on mandatory reporting says very little about the role of the wider public sector other than reporting to Scottish Ministers on their compliance with climate change duties.

Under the Public Bodies Climate Change Duties as set out in Part 4 of the Climate Change (Scotland) Act 2009 the wider public sector is mandated to deliver government policies on climate change, both in terms of managing their own estates and through their wider operations. We suggest this might be reflected in the draft Plan, particularly as the role of the wider public sector is implicit in many parts of the reduction targets (e.g. the Services Sector).

Given that RPP2 states “By 2027 we will have witnessed a complete transformation in the way Scottish public bodies work and in how their estates are managed”, it would be helpful to have clarity on this issue, so that organisations such as HES can make a full and appropriate contribution to supporting the implementation of the Scottish Government’s Climate Change Plan.

#### Chapter 4 – Statutory duties and methodologies

We note and welcome the statutory duties set out in section 4 of the draft report and the targets to 2032 which were approved by the Scottish Parliament in October 2016.

#### Chapter 5 – Achieving transformational change

Whilst we welcome the overall ambition of the transformational outcomes set out in the draft RPP3, it is not clear how some of the ambitious targets set out in the draft plan are to be achieved and we consider that this would benefit from greater clarity. For example, under the services chapter, figure 16 on page 91 shows a 2-step reduction. The reduction after 2025 is reliant on new technologies and/or the move away from gas space/water heating and this is discussed. What is more pressing is the very large (approximately 40%) reduction required between now and 2021 which we assume must rely largely on energy efficiency. How this is to be achieved in reality over the next 4 years is unclear especially since progress to date has been slow (only 7% since the 2009 Act); and given there is a need to establish a baseline for the sector (10.1.3).

We support the statements made in relation to the role of the planning system in enabling the delivery of the statutory climate change targets in section 5.2 of the draft plan. We note the key national policies highlighted in paragraph 5.2.5 as those which help to reduce the greenhouse gas emissions from development. However, we consider this to be a rather partial summary of policies from Scottish Planning Policy (SPP) which support the

implementation of these aims. It would be preferable if this section highlighted the outcomes identified in paragraphs 9 -23 of SPP. We consider that identifying outcomes rather than individual policies is preferable as it allows for the application and weighing of policy considerations relevant to individual decisions on a case by case basis.

### Chapter 7 – Electricity

We note the Scottish Government’s ambitions, policy outcomes, policies, development milestones and proposals in relation to the decarbonisation of Scotland’s electricity system during this plan period. We note the links in this chapter with the Scottish Government’s Energy Strategy which is also currently out for consultation. We will be submitting a response to the Energy Strategy and its accompanying environmental assessment in due course.

We note that there is the potential for proposals falling from the plan as it relates to the electricity sector to impact on the historic environment as a result of their construction, operation and potentially their decommissioning. We welcome recognition of this in the draft RPP3 and of the role of the planning system in addressing the potential for adverse impacts and ensuring that developments are permitted in appropriate locations. However, we would highlight that there appears to be an out of date reference to planning legislation in the third column of table 7-7 (page 41). We recommend that this is updated with a reference to relevant legislation which applies in Scotland.

### Chapter 8 - Residential

In general, there is a lack of clarity around some of the stated ambition for policies and proposals for the residential sector. These aspects of the draft plan seek to improve the fabric of existing buildings to increase energy efficiency. A more nuanced approach should be taken in respect of such interventions, particularly for traditional buildings. The link between improving the appearance of the built environment and regeneration and other benefits would benefit from some clarification in the final report.

Furthermore, seeking to alter the appearance of listed buildings, buildings within Conservation Areas and other types of traditional buildings may harm their special interest. In light of that it is important to seek options for improving energy efficiency without detriment to the historic environment. For example, paragraphs 8.1.3 and 8.2.3 refer to solid wall dwellings. Solid wall insulation can create particular problems for historic and traditionally constructed buildings which are often viewed as being hard to treat. External wall insulation will almost always be unacceptable for listed and historic buildings as it can be harmful. Such measures can result in damage to the building fabric as it will not be allowed to breathe, in addition to obscuring a traditionally stone built facade. Thus, sometimes it will not be technically feasible or desirable to apply external wall insulation on traditional buildings. [Historic Environment Scotland](#) has developed alternative ways of improving the external envelope of buildings and would be happy to assist in any more detailed policies.

It is also worth noting that nearly half of controlled waste comes from the construction and demolition industries. The retention or reuse of historic building stock and reuse of salvaged materials can make a significant contribution to the circular economy and waste reduction.

## Chapter 10 – Services

As noted in our comments for the residential sector, there is a lack of clarity around some of the stated ambition for policies and proposals for the residential sector. These aspects of the draft plan seek to improve the fabric of existing buildings to increase energy efficiency. A more nuanced approach should be taken in respect of such interventions, particularly for traditional buildings. The link between improving the appearance of the built environment and regeneration and other benefits would benefit from some clarification in the final report.

Our comments under that heading relating to the need to avoid potential harm to traditional buildings remain relevant in relation to public and commercial buildings. There is the potential for ill-considered schemes to result in negative outcomes such as decay of building fabric and poor internal environment for occupants (e.g. trapping of moisture in buildings due to application of insulation, leading to mould growth, rot etc.). It will be important to seek options for improving energy efficiency for non-domestic traditional buildings which can be implemented without detriment to their character and special interest.

Table 10-2 identifies a number of milestones relating to Scotland's Energy Efficiency Programme (SEEP). In relation to the 'advice and information' milestone, Historic Environment Scotland has undertaken research and delivered specialist technical advice through its publication and events including training to the Energy Saving Trust and Home Energy Scotland and others in order to enable appropriate solutions for older building types. This will include the use of vapour open materials and additions to existing fabric rather than removal and replacement of fabric. HES has offered to partner with Local Authorities in delivering SEEP pilots on hard to treat properties. Some of these measures are quite niche and will benefit from incentives to wider take up in order to achieve economies of scale. This could include the development of a supply chain in appropriate materials for thermal upgrade. Historic Environment Scotland would be able to contribute energy data resulting from monitoring and improvement measures on our historic estate for the 'evidence and evaluation' milestone.

There is no mention of the cooling energy requirement in the existing building stock, and how traditional passive techniques can contribute to reducing cooling loads particularly in non-domestic buildings. Such technologies can also inform modern building design.

## Chapter 11 – Industry

We note the summary of policies, development milestones and proposals for the industrial sector. We note the reference to SEEP in table 11-2. Our advice in relation to SEEP and the application of energy efficiency measures to traditional buildings as set out above under the headings on residential and service sectors remain relevant.

## Chapter 12 – Waste

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).

There is no explicit mention in the draft plan of construction or demolition waste but nearly half of controlled waste comes from the construction and demolition industries (source [Making Things Last](#)). If second hand/refurbished goods are being explicitly mentioned,

then perhaps historic buildings and salvaged materials should be too. Retention/reuse of historic building stock and reuse of salvaged materials can make a significant contribution to the circular economy and waste reduction.

Historic Environment Scotland provides advice and guidance on traditional materials and the reuse and refurbishment of traditional buildings. We would be happy to be identified, through our Climate Change team, as a delivery partner in “Target to recycle 70% of all waste by 2025” “Action to reduce waste and establish a more circular economy, where goods and materials are kept in use for longer”.

### Chapter 13 – Land Use and Chapter 14 - Agriculture

We note and welcome the Scottish Government’s ambitions for both land use, which appears to deal with forestry, peatland and agriculture sectors. Proposals or projects resulting from policies in draft RPP3 for these sectors may also have an impact on the historic environment, for example ground preparation or ploughing for forestry projects have the potential to damage archaeology and once in-situ for woodland has the potential to have a masking effect historic landscapes. Peatland restoration may have an adverse impact on archaeological remains. We consider that there are opportunities where clarification could be provided to ensure that the historic environment is explicitly included within the meaning of terms such as ‘sustainability’, ‘landscape’ and ‘wider environment’. Without this clarity there is a danger that the effects of such proposals on the historic environment could be missed.

Projects within these sectors do not traditionally fall within the meaning of development as recognised by the planning system. We welcome the recognition in paragraph 13.3.14 that the potential negative impacts of woodland creation schemes can be mitigated through meeting the requirements of the UK Forestry Standard. In terms of impacts from emissions reduction in the peat sector, it is not necessarily correct to suggest that there are no adverse effects at the general level as stated in paragraph 13.4.14 as such schemes could have a potentially significant effect on the archaeological resource if they are not carefully planned. The potential for the intensification of agriculture, as highlighted in paragraph 14.4.6 may also have an adverse impact on the historic environment. On this basis, it is important for the final plan to recognise that there is the potential for impacts to arise from sectors including forestry, land use and agriculture on the historic environment. Such impacts require to be addressed as part of relevant decision-making processes including Environmental Impact Assessment.

We note the policies identified in table 13-1. We recommend that the historic environment should be further reflected in grants for sustainable land management and forestry. The potential benefits for the historic environment should be highlighted alongside those for the natural. Historic Environment Scotland would be happy to be identified as a public sector partner in the delivery of grants. We would also be happy to be identified as a public sector partner to provide advice on a targeted woodland creation programme on the National Forest Estate, in line with our advisory role which is set out in a forthcoming Joint Working Agreement with the Forestry Commission Scotland.

### **Part 2: Environmental Report**

This response addresses the section of the Strategic Environmental Assessment (SEA) Environmental Report (ER) which relates to the draft Climate Change Plan. In preparing this response I have noted the information provided in the following sections of the ER

- 1 - Introduction
- 2 - Approach
- 3 – Scotland and Climate Change
- 5 – Context of the draft Plan
- 6 – Findings of the Assessment, specifically 6.1 – Introduction, 6.2 – Summary of Effects
- Appendix A – Relevant Environmental Protection Objectives and Environmental Baseline Information
- Appendix C – Assessment Tables

I have used the consultation questions set out on page 84 to provide comments on the ER to structure this response.

#### Accuracy and Scope of Baseline Information

I note the environmental protection objectives for the historic environment as set out in section 9 of the ER on pages 102 – 104. I am content that it forms an accurate account of relevant legislation and policy. However, Historic Environment Scotland has published a range of guidance which will help to ensure that a number of policy areas identified in the draft Climate Change Plan can be implemented without detriment to the historic environment. Our Managing Change in the Historic Environment series of guidance notes will be helpful in identifying best practice and understanding the application of policy principles set out in Scottish Planning Policy to assist with the mitigation of impacts at project stage.

#### Predicted Environmental Effects

I consider that the assessment of predicted effects would have benefitted from a more robust approach to both the positive and negative effects of the draft climate change plan. For example, the assessment of the likely impact of policies and proposals for woodland or forestry cover targets for agricultural land should have identified the potential for such proposals to have an adverse effects through both damage to archaeology by ground preparation works for planting and also the potential for woodland and forestry to mask historic landscapes. Likewise it would have been helpful for such effects to have been drawn out in relation to the forestry sector. There is the potential for positive and negative effects across all sectors identified in the plan and a number of these issues have been raised in our response to the draft plan in part 1 of this response.

#### Assessment findings, monitoring and mitigation proposals

Whilst we welcome the policies and proposals set out in the draft plan, the findings of the assessment would have benefitted from a more nuanced assessment to its potential negative and positive impacts. That said, I welcome recognition in paragraph 6.4.28 that the installation of energy efficiency measures have the potential to have an adverse impact on traditional buildings and their character. These aspects should be drawn out in the final climate change plan and opportunities to address these issues should be identified.

Turning to mitigation, I note and agree with the conclusion that many of the effects identified in the draft plan will be mitigated through existing mechanisms such as appropriate siting and design of projects. On this basis, it will be important for the final plan to recognise that impacts arising from other sectors including electricity, forestry, land use

and agriculture on the historic environment will also require to be addressed as part of relevant decision-making processes including Environmental Impact Assessment.

**Historic Environment Scotland**  
**16 March 2017**