



# RIAS | The Royal Incorporation of Architects in Scotland

## HISTORIC SCOTLAND CORPORATE PLAN 2012-15

### Detailed comments by the Royal Incorporation of Architects in Scotland

As the draft Corporate Plan notes, the historic environment has a key role to play for Scotland, in tourism, regeneration, education and identity. We welcome the commitment that the plan gives to both managing the historic environment and releasing its potential across a broad range of areas and activities. Historic Scotland has an important role to play. It is very helpful to see its aspirations set out, particularly given the clear financial pressures that the reduction in Government funding in coming years will impose on the Agency. We should say at the outset that we welcome many of the individual initiatives and activities identified within the report. The commitment to supporting the construction sector, craft skills and apprenticeships for example is particularly positive.

**Overall.** We do have very significant concerns about the contents of the plan more generally. We also are very concerned to note that the plan appears to be signalling very significant changes in direction and emphasis in relation to the Government's roles, responsibilities and aspirations for the historic environment in Scotland. It seems to us that before such a shift can take place there should be wide debate and discussion – far beyond that provided by the necessarily limited consultation exercise for the proposed Corporate Plan.

**Environmental Report.** We are concerned that the Environmental Report appears to be being used as a way of introducing and justifying changes but without providing the relevant and detailed information on which such changes have been justified.

By way of example, the evaluation of the Corporate Plan priorities should not be based on an evaluation of whether they will have a 'positive benefit' but instead there needs to be an assessment of opportunity cost – i.e. given the declining Government grant, what work is being stopped or reduced and are there other options which might deliver *more benefit*?

**Framework Document.** While the Environmental Report makes reference to the *Framework Document*, the draft Corporate Plan does not. This is surprising as the *Framework Document* sets out both the aims that Ministers give Historic Scotland and the Agency's main functions. We are not clear if the intention is to alter the *Framework Document* as a result of the development of the Corporate Plan. At the moment there is no reference to this intention or any timetable for such changes in the Corporate Plan.

**Inconsistency.** When reading the draft Plan as a whole, there is a worrying inconsistency in emphasis and content between the individual sections. This means that you gain a very different picture of the overarching vision, and how Historic Scotland intends to support it, depending on which section you are reading. By way of example, it is difficult to see why *Buildings at Risk* appears at A2 in the table on page 9 but does not appear in the earlier table and is not emphasised elsewhere in the draft. As we understand it the Buildings at Risk

Register is a published government priority and the number of category A Buildings at Risk in Scotland provides the Scottish Government's key measure for the historic environment as a whole in the *National Performance Framework*. This problem is repeated for a number of areas of activity contained in the report. There is also a very poor read-across between the table on page 7 and the more detailed table on page 9. The lack of read-through for the report as a whole is very unfortunate - it does not give a sense of a balanced or integrated vision within the organisation. It also suggests that very significant changes in priorities and resourcing of activities are taking place but the reasons and justification for this are not clearly set out.

**Duties of Scottish Ministers.** Although page 4 of the report discusses legislative responsibilities for the historic environment, this discussion needs clarification and we would question the lack of emphasis on these responsibilities in the draft report as a whole. The legislative duties undertaken by Historic Scotland are mainly given to them by the Scottish Government by way of the *Framework Document*. It is Scottish Ministers that have a duty to compile the statutory schedule of ancient monuments under the 1979 Act and the statutory list of historic buildings under the 1997 Act. In practice these are carried out by Historic Scotland under the *Framework*. In return for this the Scottish Government provides public funds. Given this, it is of very great concern that these specific duties do not appear in the tables on page 7 and page 9. Indeed the role of designation is essentially invisible in the draft Plan, despite the fact that an ongoing programme to develop and review the statutory databases of designated heritage assets is a legislative duty.

When this is coupled with the stated intention to carry out a fundamental review of Scottish Historic Environment Policy (identified C.1 of the table on page 10 - but not mentioned anywhere else in the report) one might gain the impression that a very significant change in the way in which Scottish Ministers intend to undertake their legislative duties in relation to the nation's historic environment is being promoted. If this is the case then this must surely be identified and emphasised throughout the report as a major issue - we suspect incidentally that this would be a cause for very significant levels of concern to be expressed across Scotland.

**Architecture.** Scotland's architecture, both historic and modern, plays a key role in the nation's identity both at home and abroad, and contributes to tourism, inward investment, and local identity. We would like to see far more emphasis on the promotion of historic and modern architecture within the plan in terms of training, public access, publications and encouraging broader understanding. At the moment the emphasis appears to be far greater on conservation and sustainability than it is on promoting this significant contributor to our cultural heritage and identity. This is not a matter of 'increasing enjoyment of Scotland's historic environment through technology' (presumably a reference to the Scottish Ten Project - with which we have concerns in terms of Scottish priorities) but a far wider commitment to promote understanding of Scotland's architecture as a whole. The recent Historic Scotland publications and day schools on post-War architecture and Hydro-Electric Power are exemplary but there is a very real sense that the organisation no longer sees such initiatives as a priority. We would strongly recommend that this is reviewed.

**Review of the Scottish Government's Historic Environment Policy.** The plan identifies that the Agency's current and future business be tested against its potential contribution to the vision and overall purpose of the Scottish Government. In discussing the proposed

Historic Environment Policy review, the report speaks of Scottish Government's Economic Strategy and the National Performance Framework. However in setting Historic Scotland's overarching responsibilities, any review of policy must give significant weight to the duties falling on Scottish Ministers through the primary heritage legislation as laid out in the 1979 and 1997 Acts and in relation to land-use planning legislation and guidance. The draft Corporate Plan creates the impression that there is already an clearly formed intention within Historic Scotland (but not clearly stated) to seek to weaken the statutory role of Scottish Ministers in relation to the historic environment both by downplaying designatory duties and by changing historic environment policy in favour of more intervention. Given the importance of the legislative and policy framework to the successful management of the historic environment in Scotland, it is inconceivable to us that a major review of historic environment policy is only identified on page 10 of the draft. We would point out that far less significant activities (such as the expenditure of public funds on the digital recording of heritage sites outwith Scotland) seem to be given far greater emphasis. We would seriously question the relative significance of such an initiative in comparison with the design and implementation of a strategic national designation strategy, particularly in a difficult financial climate.

**Regeneration.** It is broadly recognised that significant parts of the historic environment can make a wide contribution to the Scottish economy through sensitive adaptive reuse – creating places to live and work, and contributing more widely to local identity, sense of place, community coherence, etc. This potential can be further released through the use of techniques such as placemaking, masterplanning, the preparation of development briefs and statements of significance, etc. Given this, it is very disappointing to note the lack of any coherent programmes which would integrate heritage management and regeneration in a proactive, collaborative and positive manner. The wording in the draft Corporate Plan 'balancing development and conservation' seems to miss the point that the key priority is to *release potential of the historic environment* to contribute to regeneration rather than seeking a balance (which implies that they are in opposition rather than complementary). More generally we sense that there is a significant shift in emphasis towards traditional skills and conservation training and away from the key role that Historic Scotland has to play relating to wider regeneration and development management. Historic Scotland must continue to support local authorities, developers, landowners and others in this area. Scottish Ministers have a legislative responsibility relating to the listed building and scheduled monuments consents process and also bear responsibilities under the planning legislation. There should be a clear and detailed commitment to this the draft plan or if the proposal is to reduce this, then this should be clearly identified.

**Grant-Aid.** We note that there is intended to be a closer link between grant-aid and sustainable economic growth (table on page 10, C.6). This appears to be based on a misunderstanding of the historic environment grant powers, the basis of which rests on significance and need. Many sites and monuments in Scotland are of national importance and deserve grant-aid even if it is not possible to demonstrate that they are contributing to sustainable economic growth. Some archaeological monuments will, for example, attract very few visitors due to their remoteness but they are nonetheless of national or international significance. In our view it would be entirely wrong for such sites to suffer due to additional considerations which are not included in the primary legislation and which effectively change the intention of the grants legislation.

**Professional Expertise.** More generally we sense that there is a weakening of professional expertise at a strategic level within Historic Scotland. This concern is felt more broadly across Scotland. By way of example, we are advised that there is no longer any archaeological expertise either at Board or senior management team level. We wonder if this lack of expertise is leading to a weakening of the organisation's strategy in this area. Given this, it seems increasingly important that opportunity is given for wider debate in relation to the major strategic changes being taken forward in the organisation. Indeed the plan emphasises the building of stronger relationships with key partners. We would welcome the opportunity to take part in such a discussion.

**Royal Incorporation of Architects in Scotland**  
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