

MANAGING CHANGE GUIDANCE – CONSULTATION DOCUMENT

Introduction

[Managing Change guidance notes](#) can help you to understand and apply national policy when changes are proposed to the historic environment. They support good decision making in the historic environment by setting out the key things to think about when changes are proposed. This can include:

- guidance on how to consider impacts on cultural significance
- relevant national policy considerations
- sources of more detailed information and technical guidance

Purpose of this document

This document is intended to be read prior to, or while completing [the online survey on the Managing Change guidance series](#). This document provides background and context to help to reflect on the key questions of the survey.

Purpose of this consultation

We are asking for your views to help us shape future Managing Change guidance.

We are seeking your feedback to ensure Managing Change guidance is fit for purpose. This engagement aims to understand how the guidance is currently being used and how we can improve the guidance as a tool to support decision making.

We are working to make sure our Managing Change guidance aligns with current policy and national priorities.

Your feedback will inform our priorities for topics for new guidance and updates.

You are only required to give feedback on topics that are relevant or of interest to you.

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Background on Managing Change guidance



What is Managing Change guidance for?

Managing Change guidance can help you to understand how a proposed change will impact the historic environment.

They can be relevant for many different types of change:

- changes to individual buildings, like replacing windows, building extensions or adapting existing buildings to new uses
- works that affect archaeological sites including scheduled monuments and historic battlefields
- new developments that can affect the wider historic landscape, such as large-scale housing developments or wind farms

When should I use this guidance?

Managing Change guidance can inform decision making about changes. This will often be a formal process, like planning permission, listed building consent, or marine licensing. It can help you to assess the impact of a proposed change. The guidance might also help you to alter proposals to reduce adverse impacts. It can also be relevant for developing plans and for decisions around funding.

The guidance is aimed at decision makers such as planning authorities. It can also help anyone interested in a decision to understand the reasoning behind it.

What status does it have?

Managing Change guidance can have weight in any decision where the [Historic Environment Policy for Scotland](#) (HEPS) is relevant. This can include decisions on land management, funding, plans and policies.

In the Scottish planning system, the Managing Change series forms part of national guidance on managing change in the historic environment. The [National Planning Framework](#) (NPF4) refers decision makers to this guidance, and it is a material consideration for relevant decisions.

Survey Section 2 – What defines the Managing Change series?

The Managing Change series is one of a range of guidance series that we produce. We have identified four key characteristics that define Managing Change guidance:

- Support decision-making processes around proposed changes including development proposals and land management change
- Advise on understanding impacts on cultural significance – in line with national policy set out in the [Historic Environment Policy for Scotland](#) (HEPS)
- Identify ways to maximise benefits and minimise detrimental impacts
- Refer directly to policy and legislation as relevant

If guidance does not meet the characteristics for Managing Change there are options for other outputs such as position statements, case studies, web content or guidance in the Archaeology Strategy programme.



Questions:

- Do you agree these are the key characteristics?
- Do you have any comments on these characteristics?
- Are there any additional characteristics that you think define Managing Change guidance?

Survey Section 3 – What are the main drivers for guidance?

Managing Change supports the [Historic Environment Policy for Scotland](#) (HEPS), which applies to all decisions that might affect the historic environment. The series therefore covers a very wide range of issues, and many of the individual guidance notes have been in use for a long time and now don't reflect current priorities or approaches. But we do not have capacity to update every guidance note so we have to identify priorities.

There are many factors that can make a guidance topic a priority. We have identified the following three overarching themes which we think are key drivers for guidance updates.

Driver 1 – Climate and nature crises



We need to make sure our guidance helps to maximise the positive contribution the historic environment can make to our response to the climate and nature crises. Adaptation and mitigation measures will result in rapid changes to buildings and places. This can include new technologies and changes to land management at a large scale. We have published more about our approach to this topic on our website: [Our work and the climate and nature crises](#).

This reflects priority 1 of [Our Past, Our Future](#) – supporting the historic environment’s contribution to net zero targets.

Driver 2 – Equality, diversity, inclusion



The historic environment creates real benefits for people, but we know that these benefits are not spread evenly across our society. Change in the historic environment should always aim to improve this disparity where possible. Decisions should be based on an inclusive understanding of the cultural significance of places and should consider the impacts on communities in the long term. Managing Change guidance should reflect these priorities and recognise the needs and expectations of diverse groups.

This reflects priority 2 of [Our Past, Our Future](#) – putting people and communities at the heart of the historic environment. It also reflects priority 3 – helping current and future generations to live well.

Driver 3 – Changes in policy, legislation and society



We need to make sure updated guidance reflects changes in policy and regulations. We also need to ensure our priority topics reflect policy priorities, especially in NPF4, as much of this guidance has its primary use in the planning system. However, there are other areas of legislation change that are relevant (such as agriculture and burials). In a wider sense, updated guidance should reflect ongoing societal changes nationally and internationally.

Questions:

- Do you agree that these are key drivers?
- Are there any other drivers at a strategic level that are relevant to the series?

Survey Section 4 – What are the priority topics?

This engagement process will not define the scope of individual topics. At this stage we are looking to clearly understand the drivers for these guidance notes, who might use them, and how. We expect to do further engagement on individual topics at a later stage.

Topic 1 – Retrofit



We expect to see a high level of change to historic buildings as we alter them to meet net zero targets, adapt to the impacts of the climate and nature crises and in response to the cost-of-living crisis.

Retrofit is a high-level topic and many existing guidance notes are relevant to retrofit works. We expect retrofit priorities to influence alterations to buildings that are not necessarily led by this motivation.

Existing relevant guidance notes

- [Micro-renewables](#)
- [Windows](#)
- [Use and adaptation of listed buildings](#)
- [Roofs](#)
- [External fixtures](#)
- [External walls](#)
- [Doorways](#)
- [Interiors](#)
- [Extensions](#)

We will update existing guidance to make sure it is fit for purpose. We are exploring ways to gather all this evidence in one web hub, with narrative explanation of which guidance is relevant to which process.

Questions:

- How would you prioritise updating existing guidance notes?
- Are there other existing guidance notes that are relevant that we have not put on this list?
- Are there topics not listed here that we should cover in new guidance notes?
- Do you have any comments on the web hub approach?

Topic 2 – Accessibility



Our existing Accessibility guidance is very out of date. We think it should reflect the [social model of disability](#). There is an opportunity for updated guidance to express the wider value of accessibility measures. This includes making our homes and other places fit for all stages of life, keeping them in use. The scope of this guidance is limited to physical accessibility – reflecting the fact that Managing Change guidance is focused on decision-making processes for proposed changes. There is the potential for wider engagement with the concept of accessibility in other outputs, and all guidance in the series should cover this topic where relevant.

Questions:

- How important is this topic? How urgent is it?
- Are there other fundamental principles this guidance should reflect?
- This guidance would be primarily aimed at homes, places of work, and public spaces, rather than visitor attractions. Any comments on where intellectual access is relevant to these?
- Do you have comments on how this topic relates to other elements of the historic environment beyond historic buildings?

Topic 3 - Conservation Areas



HES has a limited role in the management of conservation areas and does not designate them. Our current [Interim Guidance](#) reflects this limited role and focuses on legislation and policy references. We propose to look at the status of our interim guidance and to explore case studies looking at best practice for appraisals and management plans.

There is development pressure on conservation areas to improve energy efficiency of buildings. Some of this will be covered by permitted development. You can read about changes to [permitted development rights \(PDR\) on the Scottish Government website](#).

The key decision-making documents for conservation areas are area appraisals and management plans. We know that about half of the conservation areas in Scotland do not have these in place, and that local authorities struggle to find capacity to undertake this work. We think that guidance from HES would not respond effectively to this problem.

Questions:

- How important is this topic? How urgent is it?
- To what extent do you agree that a lack of appraisals and management plans is the biggest challenge in this area?
- What other challenges (if any) do you think are more important?
- Do you have any comments on how HES can help with these challenges?
- Do you use or refer to the Interim Guidance?
- If we update the Interim Guidance, would you want it in the same format, or could it become web content or part of another document?
- Would case studies on management plans and appraisals be useful?
- If you would prefer guidance, what should it cover?

Topic 4 – Landscape



We do not currently have Managing Change guidance on this topic. However, we have published a [joint statement with NatureScot on Landscape](#). This sets out a holistic approach to landscape which encompasses nature and people, the past and the present, and tangible and intangible components.

National policy in the [National Planning Framework](#) (NPF4) separates policy on ‘natural places’ from policy on ‘historic assets and places’. We aim to support consideration of the natural and historic environment in the implementation of all policy areas.

This guidance would support assessment of impacts on the historic elements of landscapes at all scales – from soil to large landscape features. Guidance would likely include an approach for assessment, as well as further details on types of change that are more likely to have significant impacts on the cultural significance of a landscape.

Questions:

- How important is this topic? How urgent is it?
- What are the key policy references for this guidance?
- In what aspects of your work would you expect to use this guidance?
- How could this guidance help to implement policies in the NPF4 for natural places?
- How could this guidance provide assistance to farming and rural communities, in line with the [Agriculture and Rural Communities \(Scotland\) Bill](#)?
- What does this guidance need to include to be useful for your work?
- Which of these land uses and development types do you consider the highest priority for the guidance to cover:
 - [Rewilding](#)
 - Forestry
 - Agriculture
 - Renewable energy production
 - Other (give details)

Topic 5 – Agriculture



98% of the land mass of Scotland is rural, and this land will be subject to significant change in the face of the nature and climate crises. Land used for growing crops and raising livestock will be managed in different ways as our climate changes and we seek to make processes more sustainable.

Changes like these are often not subject to consenting processes, and HES does not have focused guidance in this area to support farming communities, consultants and decision makers. We are looking at various ways we can support these groups, which may include formal guidance relating to funding and implementation of the [Agriculture and Rural Communities \(Scotland\) Bill](#).

Questions:

- How important is this topic? How urgent is it?
- How would you rank the usefulness of the following:
 - Leaflet – written in clear language, aimed at farmers and land managers, setting out considerations, roles and responsibilities, key contacts, sources of advice, the law
 - Training – on assessing impacts of agriculture on the historic environment – targeted for agricultural and environmental consultants and those involved in formal decision-making processes
 - Formal guidance published online – for applying national level policy as set out in HEPS and decisions relating to the Agriculture Bill
- Are there other types of support we could provide in the context of [our regulatory and advisory functions](#)?
- What types of changes of land management or associated decision processes should any guidance cover?
- What does this guidance need to include to be useful for your work?

Topic 6 – Battlefields



HES has made a public commitment to review our guidance for Historic Battlefields. The wording of planning policy on historic battlefields changed in 2023 with the adoption of the [National Planning Framework](#) (NPF4).

Review of the [Selection Guidance](#) for historic battlefields is currently underway. There may also be alterations to the format of inventory entries. These factors are all likely to influence the review of the existing Managing Change guidance note on this topic. We will review this guidance note once these updates are made.

Questions:

- Are there any other specific changes which would influence an update of this guidance note?
- What does this guidance need to include to be useful for your work?