

Chief.Planner@gov.scot

20 May 2016

RE: Draft Advice on Net Economic Benefit and Planning

Dear Madam or Sir,

Thank you for the opportunity to comment on this [Draft Advice on Net Economic Benefit and Planning](#). Our response focusses on the economic contribution of archaeology and the wider historic environment to the planning process, and the generation of economic benefits that can be directly derived from it.

Whilst we generally approve of the draft guidance in its current form, we believe that specific reference to the manner in which economic benefits derived from positive engagement of development with the historic environment (and other aspects generally considered to be socially, culturally, or environmentally beneficial) can be used within calculations of net economic benefit should also be included. This inclusion, whilst a relatively minor matter, would be significant, as it would ensure that environmental and social benefits are not only seen as factors which must be balanced against economic benefit, but can also directly contribute to it.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,200 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

CIfA's Scottish Group has over 250 members practising in the public, private and voluntary sector in Scotland. Furthermore, CIfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

General comments

The economic value of the historic environment is derived in a number of ways: It plays an important role in tourism, providing focal points and attractions for visitors, creating jobs, and supporting business on the local and national scale, stimulating small and medium sized enterprises, developing new markets and encouraging inward investment. Heritage is also often a key locus for regeneration, such that a development which effectively capitalises on heritage assets in a positive way can often create a snowball regenerative effect in the local area. Furthermore, archaeology and heritage can add intrinsic economic value to development, contributing to unique and high quality places which command greater market value. The World Bank positively encourages development that looks to preserve cultural heritage – it sees that understanding and enhancement of cultural significance or ‘cultural capital’, has a positive effect on the value of its projects and assets. Historic buildings and places can also provide the opportunity for types of commercial activity that might not otherwise be possible, providing additional economic activity and new employment opportunities for local people.

Balancing social, environmental and economic benefits

The Scottish Planning Policy (SPP) sets out the positive principle of a presumption in favour of development that contributes to sustainable development. This guidance recognises that the SPP promotes development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets. However, we argue that in addition to this, it is possible also, through effective incorporation of heritage assets into development proposals and local plans, to capitalise on these assets in a way which can directly contribute to economic benefits. We recommend that this recognition could be helpfully inserted into the guidance.

Setting out this point in principle would ensure that stakeholders in the planning process would not be able to characterise the balance between social, environmental, and economic benefits as being essentially opposed, i.e. that when environmental and social benefits are increased, that economic benefits will decrease, or vice versa. Whilst in many cases it may be necessary to weigh the stated economic benefit resulting from a development against harm to the significance of heritage assets or wider environmental or cultural factors, this does not always need to be the case.

For example, developments which utilise existing heritage assets on a site, are designed to reflect archaeological heritage of the local area, create particular facilities such as visitor centres, draw on the heritage of a site for commercial purposes, or preserve and enhance remains, may – as well as having a net positive environmental and cultural benefit – contribute directly to the economic benefit likely to accrue for development. This potential needs to be clearly articulated in this guidance as it represents a virtuous use of planning policies for sustainable development.

This principle would also sit comfortably with all other elements within the draft guidance, and would reveal a greater potential for development which consciously reflects on how direct and indirect economic benefits of conserving and enhancing the historic environment are possible.

Yours faithfully,

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