

HISTORIC ENVIRONMENT POLICY CONSULTATION

Introduction

1. The Scottish Property Federation (SPF) is the voice for the real estate industry in Scotland. We include among our members: property investors, including major institutional pension and life funds; developers; landlords of commercial and residential property; and professional property consultants and advisers.

Key Interest

2. The SPF's main interest in the Policy is to assist Historic Environment Scotland (HES) to remain in a position to support positive outcomes for the historic built environment. The private sector is the largest source of investment in the heritage sector and we are pleased to work ever more closely with HES, to drive the potential of the sector and its contribution towards sustainable economic growth.

Key Concerns

- The key tenet of the SPF's policy on the historic environment is our belief that the best way to maintain historic properties is through their effective retention in use. However, difficult decisions will occasionally need to be made regarding the continued use and even the existence of some buildings where this is not feasible, for a variety of reasons.
- The industry would welcome the support of HES to address the growing complexity and legacy of managing historic assets, where challenging economic conditions have tested viability considerations and their regenerative potential.
- In developing the Policy Statement, it will be important to have a strong input into the influence of wider government policies and their effect on the built environment, for example retrofit requirements as a result of the energy efficiency agenda.
- Our members strongly support the operation of effective and efficient systems that align with the streamlining of the planning system, in accordance with the aims of the Planning (Scotland) Bill.

General Comments

3. The SPF is firmly of the view that there should be a clear policy on a requirement for owners of heritage assets, such as listed buildings or assets within conservation areas, to adopt responsible stewardship plans and budgets. This should assist both developers and decision makers identify a conservation remedy that is economically viable in cases where there could be regrettable, but unavoidable, "harm" to a neglected heritage asset.
4. We recognise and understand the need for preservation and note the assumption to conserve historic buildings. However, difficult decisions will occasionally need to be made regarding the

continued existence of some buildings where this is not feasible. Clearly it will be preferable to adapt or manage buildings to alternative uses in order to preserve their existence, but it is important for the Policy Statement to recognise that sometimes historic buildings need to be adapted to fit modern requirements and standards.

5. Unfortunately, there is a growing proportion of listed buildings that are simply not fit for modern occupational requirements and this is an issue that needs to be acknowledged and addressed. For example, converted former town houses in the city centres of Glasgow and Edinburgh. Thus, there is a growing legacy of historic assets where challenging economic conditions have tested viability considerations and their regeneration potential. In general, investors will be unable to allow proposals to 'drag on' with allocated funds being unable to achieve their required return – time is money. The time scales involved and feasibility of investing in older properties will become an increasingly critical determining factor in striking a balance between safeguarding historic assets in as close to their original presentation as possible, whilst realising their potential in contributing to sustainable economic growth and protecting our future heritage.
6. Our members question whether the current system does enough to promote the better use of dormant listed buildings and encourage the reuse of listed buildings, which by their nature are often town centre and often also located in a prominent site. It is worth bearing in mind that these listed buildings are not exempt from the climate change retrofit requirements, which creates cost problems for potential investors.
7. Sometimes overlapping policies introduced for conserving and preserving the historic environment can make it difficult to address issues of use and adaptation. For example, permitted development rights (PDRs) generally do not apply in conservation areas, of which there are around 600 in Scotland, including much of central Edinburgh. Likewise, protecting broadly identified historic battlefields from inappropriate development is undoubtedly a good thing. However, the designations that have been made so far seek to capture the wider area of the battlefield and are often extensive. No notice or consultation is required for the listing of a battlefield, except after the event and a number of commercial properties in these areas, including modern properties, may face additional planning controls when they next require a property refit.
8. The SPF welcomes the opportunity to respond to this consultation and would be pleased to discuss our views and comments at HES's convenience. Answers to the specific questions within the consultation are set out in the attached **Annex**.

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HEP1 - Principles and policies: Understanding and Recognition

Question:					
To what extent do you agree or disagree with the following core principles for Understanding and Recognition?					
	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
A wide range of values can contribute to cultural significance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Knowledge and information about the historic environment are critical to the understanding of our past, present and future. A place must be understood for its significance to be identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The historic environment evolves over time, and so does our understanding and appreciation of it	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
We are all responsible for enhancing our knowledge and making it widely accessible	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question:
Do you have any comments on these core principles for Understanding and Recognition?
Further definition on cultural significance and how to assess cultural significance should be provided, and the terminology would benefit from greater clarity. Assessing and interpreting cultural significance is a particular skill - there is concern that decision makers in the development process are not sufficiently trained to assess cultural significance, interpret assessments of significance and attributing values, nor how these assessments can inform and contribute to the development process.

The related policy on how these principles should be applied for Understanding and Recognition is:

HEP1

Decision-makers should adopt a holistic approach to the historic environment, incorporating an inclusive understanding of its breadth and cultural significance.

Question:
Do you have any comments on the policy for Understanding and Recognition?
HEP1 - Our members are of the view that this could be difficult to apply. There is a risk that this could be misinterpreted and misrepresented. For example, it could be difficult for a decision maker (whether as a developer or an LPA) to demonstrate conclusively that they have adopted a holistic approach to the historic environment and provided an inclusive understanding of its breadth and cultural significance. There must be some element of proportionality respective to the heritage asset and the proposals coming forward e.g. <i>HESPS 3.34 Applications should be supported by sufficient</i>

information to allow the proposed works and their impact on the buildings character to be understood. The amount of information required will depend on the nature of the building and the proposals.

There is no definition of the scope in relation to the holistic approach, or the extent of the historic environment in this policy, which should be confined to the heritage assets/place or subject affected and/or the development site and assets affected. Our members are of the view that this policy is too loosely defined and could be open to challenge or contention.

HEP2, HEP3 & HEP4

Principles and policies: Managing Change

The core principles in the draft Historic Environment Policy set out a shared understanding of how the historic environment should be managed.

The accompanying policies set out how these principles should be applied.

The related policies on how these principles should be applied for Managing Change are:

HEP2

Decision-makers should ensure that the benefits, understanding and enjoyment of the historic environment are secured for the long term.

HEP3

Strategic plans and policies and the allocation of resources should protect and promote the historic environment.

Where detrimental impacts on the historic environment arising from plans and programmes are identified and unavoidable, steps should be taken to demonstrate that other options have been explored and mitigation measures put in place.

HEP4

When considering changes to specific assets and their context, significant harm should be avoided. Opportunities for enhancement should be sought where appropriate. Where detrimental impacts on the historic environment are unavoidable, these should be minimised and mitigation measures put in place.

Question:					
To what extent do you agree or disagree with the following core principles for Managing Change?					
	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Change has to happen for places to thrive	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Good decisions take a long-term view	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Good decisions are transparent, robust,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

consistent and proportionate					
Caring for our historic environment benefits everyone, now and in the future	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To manage the future of the historic environment in a sustainable way, its significance, and the significance of elements within it have to be understood	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Good decisions make sure that nothing is lost without considering its value first and exploring options for avoiding its loss	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Good decisions retain the cultural significance of the historic environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question:

Do you have any comments on these core principles for Managing Change?

Our members have expressed concern that it is not always possible to retain all the elements that contribute to the cultural significance of the heritage asset and to provide it with a sustainable long-term future. Sometimes loss/change is unavoidable, and a balance or compromise has to be made, informed by the understanding of significance and other economic or environmental factors.

Question:

Do you have any comments on the policy for Managing Change?

HEP 2

Our members are of the view that this policy requires tighter drafting. The policy implies that change in the historic environment should be prevented and does not imply that change should be managed.

The use of the word 'ensure' should be avoided as this could leave decisions made open to legal challenge and suggests a guarantee that the benefits, understanding and enjoyment of the historic environment will override all other determining factors in decision makers, including the cultural significance of the historic environment asset or place.

It is not clear how this relate to the principles of cultural significance, how it is proportionate and how is this measured, if the historic environment component has little significance it may require to be secured for the long-term.

Our members are also of the view that this does not relate to situations where there may be loss of significant elements, components or assets to achieve wider benefits (i.e. public or economic benefits). It is also unclear how the policy relates to the principle that good decisions take a long-term view and managing change in a sustainable way.

HEP 3

Our members have suggested that this should be broken down into two policies as follows:

- One relating to strategic plans, policies and resources, which should seek to protect and enhance the historic environment; and
- a further policy which demonstrates that other options to avoid detrimental impacts have been considered. This also needs to relate back to the understanding of cultural significance to determine whether a detrimental impact is likely. It is also not clear what evidence is required to justify detrimental impacts, and the proportionality of the evidence required in relation to significance and impact.

HEP4

Our members are of the view that this policy could benefit from further clarity on what constitutes/could constitute significant harm and how this relate to cultural significance. Clarification on how should this be measured and how can it be justified would also be helpful. There is considerable case law in England which has provided for helpful guidance. It would also be helpful to expand on what determines acceptable levels of harm and what other determining factors should be taken into consideration- either as mitigation or in the interests of long term viable or beneficial use.

HEP5 & HEP6

Principles and policies: Working Together

The core principles in the draft Historic Environment Policy set out a shared understanding of how the historic environment should be managed.

The accompanying policies set out how these principles should be applied.

Question:					
To what extent do you agree or disagree with the following core principles for Working Together?					
	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
Everyone has a stake in the historic environment and how it is looked after	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Effective management is a collective effort	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Effective management should be undertaken in balance with the surrounding environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The best management involves empowering and involving communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Early dialogue and close collaboration lead to better outcomes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question:
Do you have any comments on these core principles for Working Together?
These principles assume that everyone who cares for the historic environment has the skills, knowledge, resources and financial capability to effectively manage and protect it.

The related policies on how these principles should be applied for Working Together are:

HEP5

Everyone should have the opportunity to enjoy our historic environment, to contribute to our shared knowledge and to participate in decision-making.

HEP6

People should be empowered to benefit from the historic environment for the purpose of the sustainable development of their communities and places.

Question:		
Do you have any comments on the policy for Working Together?		
Our members are of the view that these policies should relate to stewardship of the historic environment and should perhaps be the responsibility of owners and stakeholders.		

Glossary

Question:	Yes	No
Do you agree with our key terms and definitions? If no, please explain which terms and definitions should be reviewed	<input type="checkbox"/>	<input type="checkbox"/>
No comment		

Question:	Yes	No
Is the glossary of key terms and definitions useful?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
No comment		

Question:	Yes	No
Are there any terms missing from the glossary? If yes, please specify.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Our members suggest that it may be helpful to add the following:</p> <ul style="list-style-type: none"> • Measures of harm (in relation to cultural significance and to assess impact) <ul style="list-style-type: none"> ○ Significant harm ○ Insignificant harm • Benefits 		

Managing Change Guidance

Question:
Are there any missing or any unnecessary?
Our members support the intention to provide a strategic high-level policy document. However, this

needs to be underpinned by, and co-ordinated with, the provision and release of updated, coherent supporting guidance. The policy and guidance landscape also need to be clear and understood by decision makers and applicants.

Members have expressed concern that there is a risk of a gap in the provision and release of supporting guidance and the revision of existing Managing Change documents. For example, if HESP’s guidance on considerations that should be taken into account to determine proposals for the alteration of listed buildings is removed, there is no separate guidance document that deals with this in the meantime.

We are also of the view that there is also a need for separate guidance on:

- Enabling development/beneficial re-use, which could link with the understanding of significance and holistic approaches to decision making (HEP1);
- development management (in particular in relation to commercial development and the historic environment); and
- the preparation of an Environmental Impact Assessment

In our view other guidance documents that need revision/updating/made more relevant include:

- Demolition; and
- setting – applicable to urban contexts not just windfarms.

There are a considerable number of managing change guidance notes available – external walls, windows, interiors, extension. These guidance notes do not just cover alteration, but also cover repair).

There are also two guidance notes on scheduled monuments, which could benefit from streamlining.

Clarity would also be helpful on what is relevant to the decision-making process and managing change, and what are guidance documents in relation to good practice/technical advice.

Any further comments

Question:

Do you have any further comments to add?

Our members have raised the following:

- Reference to the legal obligations of statutorily designated assets should be incorporated into policy and guidance.
- Definition of types of designations and non-designated assets should be provided and clarity between these different types provided, including the weighting afforded to different designations in the decision-making process, and assessments of harm.
- There is concern that much of the criteria for assessments of proposals included in HESPS will be lost as this is not covered in the Managing Change Guidance.
- The timescale for the revisions to the Managing Change Guidance in relation to the HEP do not correspond well and there is a concern that this will impact on the decision-making process
- Related to the above LDP reviews and new development plan timescales need to be co-

ordinated with the new policy and guidance framework – e.g. to ensure that they are within the correct timeframe and consistent with the new national policy and guidance.

- Awareness training and guidance in the application of the new national policy and guidance needs to be provided to local authorities and other decision makers, including HES in relation to significance and assessing levels of harm/impacts. Decision makers are unlikely to be familiar with these terms and their implications for decision making

Purpose and status

Previous engagement with stakeholders and the public has highlighted the need for us to be clear about what this policy is for, its status and how it should be used.

Question:					
To what extent do you agree or disagree with the following statements?					
	Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
The purpose of the Historic Environment Policy is clear	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The status of the Historic Environment Policy is clear	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I understand what the policy is trying to achieve	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Further clarity would be helpful on the status and reference to statutory acts and designation to give some weight to the policies.					

Question:	
Which of the following functions do you think the draft Historic Environment Policy performs?	Select all that apply
Promotes an inclusive understanding of the values of the historic environment	<input type="checkbox"/>
Promotes people's participation in decisions concerning the historic environment	<input type="checkbox"/>
Encourages a consistent and integrated approach to decision making in support of positive outcomes for the people of Scotland	<input type="checkbox"/>
Supports the vision and aims of Our Place in Time, Scotland's strategy for the historic environment	<input type="checkbox"/>
Reflects principles set out by international charters and conventions on cultural heritage and landscapes	<input type="checkbox"/>
Provides guidance for decision making affecting the historic environment	<input type="checkbox"/>

The proposed name for the policy is the Historic Environment Policy (HEP).

Question:			
To what extent do you feel this name is a suitable title, reflecting the policy's content and status?			
Strongly disagree		Neither agree or	Strongly agree

		disagree		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Do you have any alternative suggestions for the title of the finalised policy?				
No comment				

Challenges and Opportunities

Question:				
To what extent do you agree or disagree with the inclusion of each of these challenges and their definitions?				
A holistic approach to the environment				
Today's rural and urban landscapes are the result of human interaction with the environment. A holistic approach recognises that every part of a landscape is related and it is therefore necessary to look at each part of the landscape with reference to the whole, while recognising that natural and cultural benefits and outcomes are often interdependent.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: There is a reference to townscapes – rather than urban landscapes.				
Climate change				
It is important that our approach to decision-making affecting the historic environment must recognise and respond to ongoing climate change and support reductions in carbon emissions and waste.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				
Community participation				
The more people that engage with and participate in decision-making affecting the historic environment, means that more sound decisions should be made. Decisions about the historic environment don't just have an impact on the conservation of the historic environment, they also have an impact on people. Decisionmakers need to weigh up potentially conflicting needs in an open and transparent way, so that everyone can understand the basis for the decision.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				

Question:				
To what extent do you agree or disagree with the inclusion of each of these challenges and their definitions?				
Diversity and equality				

Our historic environment should be accessible and provide a source of inspiration, enjoyment and learning for everyone. It should reflect the whole of our society. We need to think and talk about the past in a way that includes everyone, and that celebrates and recognises the diversity of our heritage.

Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: No comment

Economic change

A strong economy supports effective management of the historic environment. The historic environment also contributes to inclusive and sustainable economic growth. We should always aim to maximise this, and make sure that people are aware of it. We need to be sure that our systems are flexible enough to handle changes in the economy.

Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: No comment

Funding

Not all elements of the historic environment can make enough money to cover the costs of maintaining them. The future of some sites will rely on external funding. There are difficult choices to be made about where to spend the available money, and not all sites and projects will receive funding. We have to be able to prioritise and think creatively about approaches to funding.

Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Consider business rates relief, VAT relief on listed buildings etc.

Question:

To what extent do you agree or disagree with the inclusion of each of these challenges and their definitions?

Intangible heritage

Established ways of managing the historic environment are based around physical, tangible things. These might be buildings, monuments, sites, places, areas or landscapes. Intangible heritage includes things that do not have a physical presence – things like stories, skills, or traditions. We need to improve our understanding of this intangible heritage. We need to celebrate and recognise it properly so that it can inform our understanding of the past and the decisions we take.

Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: How is this resourced and captured in a meaningful way?

Land management				
Agricultural and land use practices and policies have an impact on our historic environment. They change constantly, so we must make sure that systems and principles for the management of the historic environment can accommodate and address these changes.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				
Creating and maintaining places				
The places where we live, work and play are central to our wellbeing. The historic environment needs to be central to decisions about how we create, maintain and enhance our places. Ensuring places are sustainable, viable, vibrant and attractive is an ongoing challenge, and is central to the successful management of their character.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				

Question:				
To what extent do you agree or disagree with the inclusion of each of these challenges and their definitions?				
Regulatory change				
When regulations change, it can alter how decisions are made. This might include changes to planning law or environmental assessment law. When changes like this happen, we will need to take them into account. To make this possible, our processes have to be flexible, responsive and led by an agreed set of principles.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				
Roles and responsibilities				
Taking care of the historic environment is a shared responsibility. Sometimes the interests of different groups and individuals overlap, and this can cause confusion and tension about roles and responsibilities. We need to make sure that everyone understands how and why key decisions that affect the historic environment are made.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				

Skills and capacity				
Good management relies on decision-makers having access to the right skills and expertise to make informed decisions. We need to make sure that there is time and support for decision-makers to do their jobs effectively.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments: Training and skills development in heritage management is required for decision makers to be able to effectively and transparently make the decisions and advise developers/other decision makers. There is currently a deficit in the correct skillset within some decision-making authorities.				

Question:				
To what extent do you agree or disagree with the inclusion of each of these challenges and their definitions?				
Societal change				
Our population is ageing and shifting. It is better connected than ever before. Our communities are growing and our lifestyles are changing. All of these things should influence how we manage the historic environment. We need to make sure that we are recognising and anticipating these trends, and that our systems proactively respond to them.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				
Sustainable tourism				
Tourism brings huge benefits to the wider economy and specifically provides financial resources for looking after many historic sites and buildings. High visitor numbers can also affect the sites themselves, and create challenges for managing them. We need to make sure that we effectively balance these effects to secure long-term benefits.				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments: No comment				

Question:		Yes	No
Are there any gaps in the challenges and opportunities listed above?		<input type="checkbox"/>	<input type="checkbox"/>
Comments: No comment			

Impact of the new draft policy

We have considered and identified the impact that the new draft policy may have as follows:

[Draft Strategic Environmental Assessment:](#)

[Equality Impact Assessment:](#)

Question:				
To what extent do you agree with the results of our environmental assessment?				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do you have any comments on our environmental assessment?				
Answer: No comment				

Question:				
To what extent do you agree with the results of our equalities impact assessment?				
Strongly disagree		Neither agree or disagree		Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do you have any comments on our equalities impact assessment?				
Answer: No comment				