

INITIAL INTEGRATED IMPACT ASSESSMENT (IIA)



This assessment covers:

- Equality Impact Assessment (EQIA)
- Fairer Scotland Duty Assessment (FSDA)

Name of Plan, Policy, Strategy, Project etc.:	Review of Perth and Kinross Council's Conservation Area Appraisals (CAAs)
Implementation Date:	Ongoing review programme beginning in 2025 for Perth and Kinross Council's 22 existing CAAs, and the remaining 11 Conservation Areas which have not been appraised to date.
Is this a:	Please Tick ✓
New strategy, policy, project, plan, service?	
Change to an existing strategy, policy, project, plan, service?	✓
Budget proposal?	

EQUALITY IMPACT ASSESSMENT

The Equality Act (2010) introduced a new public sector equality duty (PSED) that requires public authorities and other bodies, in the carrying out of their public functions, to have due regard to the Act's 3 aims, which are the need to:

- Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the Act;
- Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic, and
- Foster good relations between people who share and people who do not share a relevant protected characteristic.

The PSED applies to any local authority (LA) activity. It sets a legal requirement for LAs to consider how their functions will affect people with different protected characteristics. The duty supports good decision-making.

The protected characteristics under the 2010 Act are:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

Having considered the possible or actual impacts of a policy, there are 4 main steps which can be taken:

Option 1: No major change – the assessment demonstrates that the policy is robust and the evidence shows there is no potential for unlawful discrimination etc.

- Option 2: Adjust the policy – involves taking steps to remove any barriers, to better advance equality or to foster good relations e.g. removing or changing part of the policy that creates any negative or unwanted impact.
- Option 3: Continue the policy – need to set out clearly justifications for doing this and how it is compatible with obligations under the duty.
- Option 4: Stop and remove the policy

It is for the decision-maker to decide how much weight should be given to the various factors being used to inform the decision, and when assessing the equality impacts, organisations should consider both the positive and negative effects.

FAIRER SCOTLAND DUTY ASSESSMENT

The Fairer Scotland Duty places a legal duty on public bodies in Scotland (including Local Authorities) to consider when making strategic decisions¹ how they can ‘reduce inequalities of outcome caused by socio-economic disadvantage²’.

In determining how to fulfil their duty public bodies must take into account the Scottish Government’s statutory guidance ‘[Fairer Scotland Duty: Guidance for Public Bodies, October 2021](#)’. The Guidance defines ‘inequalities of outcome’ as ‘measurable differences between those who have experienced socio-economic disadvantage and the rest of the population...’, and lists some examples of inequality of outcome as including:

- Connectivity (internet access)
- Income
- Employment
- Education
- Health
- Life Expectancy
- Mental Health
- Overweight/obesity
- Communities (neighbourhood satisfaction), and
- Homelessness (both a cause and a result of social inequality, health inequality and poverty)

Other key considerations which public bodies should be aware of are that the Duty:

- Applied from 1 April 2018 and decisions made prior to this are not covered.
- Does not override other considerations, for example equality or best value.
- Is a key consideration underpinned by statute, and
- The Equality and Human Rights Commission is the Regulator for the Duty and is closely involved in monitoring and development of best practice for it.

¹ Strategic Decisions are key, high-level decisions taken by public sector bodies e.g. deciding priorities and setting objectives.

² ‘Socio-economic disadvantage means living on a low income compared to others in Scotland, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access goods and services...[It] can be experienced in both places and communities of interest, leading to further negative outcomes such as social exclusion.’ Page 8, Scottish Government, Fairer Scotland Duty: Guidance for Public Bodies, October 2021.

STAGE 1: SCREENING - DO I NEED AN IIA?					
Does the policy impact any of the following:	If 'Yes' or 'Maybe' please go to Stage 2 and complete full IIA				If all No, sign off IIA
	Yes		Maybe		No
	Positive	Negative	Positive	Negative	
Equalities – any positive or negative impact(s) to people from protected characteristics group(s)			✓	✓	
Socio-economic disadvantage – low/ no income/ wealth or deprivation				✓	
Is the policy of strategic importance/ a strategic decision? Does the Fairer Scotland Duty apply?					✓
Brief description of reasons for choosing the above boxes i.e. why it will/ may affect these groups positively or negatively:	<p><u>Potential Negative Impacts – Disability and Age</u></p> <p>As the overall purpose of Conservation Area Appraisals is maintaining the integrity and special character of these places, there could be potential conflict between access and historic buildings for people with disabilities, and for older people who can experience issues with access to buildings due to individual health and/or mobility issues.</p> <p>However, where a development would affect the character of a Conservation Area, the relevant application for planning permission will be advertised providing an opportunity for increased public participation in the review process for all groups. Furthermore, there are policies in place to enable development/ modifications/ reasonable adjustments to such buildings to allow them to meet the access needs of users.</p> <p><u>Potential Negative Impacts – Socio-Economic Disadvantage</u></p> <p>The review of CAAs does not represent a strategic decision on behalf of the Council, but rather the key objectives and outcomes will be more localised in nature. As such a Fairer Scotland Duty Assessment is not required. However, it is worth noting that there will be costs associated with the maintenance and development within a Conservation Area as additional planning controls are in place to protect the special character of those areas. As a result, most forms of development, including replacement windows, doors, the installation of satellite dishes etc. will require the submission of a planning application with associated fees.</p> <p>In weighing up the additional cost associated with the maintenance and development of properties within Conservation Areas it is also important to consider sustainability and best</p>				

STAGE 1: SCREENING - DO I NEED AN IIA?

value; in many instances these additional planning controls can help to ensure value for money as appropriate materials are often more sustainable with a longer life span.

Although the materials used in the construction of traditional properties are often more sustainable and longer lasting, these buildings can be less energy efficient than their modern counterparts, which can lead to higher home heating costs, with potential subsequent impacts on those residents who might already be experiencing fuel poverty. It is important to remember that consideration of the individual historic asset and its setting is crucial when identifying energy efficiency upgrades to avoid detrimental impacts on the individual building and the Conservation Area.

In respect of the above, various funding options may be available to assist householders with certain types of repairs and/or restoration of listed buildings and unlisted properties within a Conservation Area, as well as making their properties more energy efficient.

Potential Positive Impacts – All Protected Characteristics

The updated appraisals will assist in the protection and controlled and positive management of the historic environment within these areas across Perth and Kinross. CAAs aim to enhance the quality of life for residents and visitors. Furthermore, the preservation of our historic environment brings associated economic benefits in terms of tourism and employment; helps promote a sense of place, identity and community, and can also support sustainable communities.

STAGE 2: INTEGRATED IMPACT ASSESSMENT

Brief description of the policy, including its key aims and expected outcomes:

The Council has a duty under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 “to formulate and publish, from time to time, proposals for the preservation and enhancement of any parts of their district which are Conservation Areas.” This means, in effect, that all existing Conservation Areas should be reviewed and re-appraised.

A Conservation Area Appraisal is an important management tool that identifies the special interest and changing needs of a conservation area, and its key objectives are to ensure the integrity of the conservation area is maintained, to prevent erosion of its character, and enable future development that enhances its character and appearance. Whilst an appraisal provides some historical background, it is not a chronological history of the settlement but instead focuses on the existing features and character.

There are 36 designated conservation areas in Perth and Kinross, and 22 of which have adopted Conservation Area Appraisals. The most recent of these was completed in 2015, and it is recognised that the documents should now be brought up to date in line with current legislation and guidance.

The review is proposed to ensure that the existing Conservation Area boundaries are fit for purpose, and the areas meet the criteria for designation. It will also incorporate a reflection on the role of Conservation Areas in delivering the Council's priorities in respect of sustainable economic development, climate change, and the need to preserve and enhance the built heritage of Perth and Kinross in accordance with local and national planning policy.

The individual updated CAAs will identify the important characteristics of the whole area including the role of trees and woodlands, important views, landmark buildings and unlisted buildings of merit.

The appraisal/re-appraisal process will include a review of the existing Conservation Area boundary and consider any changes that have occurred within an area since the previous review.

For the most part, the general content of previous CAAs will remain relevant, and changes to the document will largely be to improve the format and update photographic images and diagrams. Management plans contained within the documents will be updated to reflect changes to legislation and guidance.

In light of Scotland’s national strategy for the historic environment: [Our Past Our Future](#) recognising the transition to net zero as its first priority, and setting out the importance of the historic built environment in achieving this, CAA management plans will contain a section on climate change and the historic environment, with links to more

	<p>detailed advice on adapting historic homes and other buildings to ensure that they are energy efficient and well maintained for the future.</p>
<p>Who are the main stakeholders?</p>	<p>The main stakeholders for the programme of reviews are:</p> <ul style="list-style-type: none"> • General public with an interest in historic environment matters; • Residents of each of the individual Conservation Areas where an appraisal review is being carried out; • Local community groups; • Interest groups and organisations, such as the Perth and Kinross Heritage Trust, and • Historic Environment Scotland <p>For each of the Conservation Area Appraisals undergoing a review the Council will consult widely with the general public via our online engagement platform, providing an opportunity for anyone with an interest in the subject matter to share their views on the content of those reviewed appraisals. A focussed drop in session will also be held in each of those Conservation Areas to give local residents and others with an interest an opportunity to view the details of the review and ask questions. All opportunities for engagement will be advertised via the Council's website and social media channels.</p>
<p>What will change as a result of the policy? Will a service be reduced or removed?</p>	<p>There will be no reduction or removal of service as a result of the review.</p> <p>The review may lead to some minor boundary amendments and/or changes to detailed guidance for specific Conservation Areas to bring them up to date in line with current legislation and guidance and to ensure that boundaries are still fit for purpose and that the areas continue to meet designation criteria.</p> <p>Once finalised, the reviewed CAAs will provide an up to date document to help guide decision-making with respect to planning applications for development within these Conservation Areas. As previously mentioned, they will also incorporate a reflection on the role of Conservation Areas in delivering the Council's priorities in respect of sustainable economic development, climate change, and the need to preserve and enhance the built heritage of Perth and Kinross in accordance with local and national planning policy.</p>
<p>How will the policy affect your customers?</p>	<p>The review will provide the Council's customers with up to date information on the special interest features of an area, its key objectives to ensure the integrity of the conservation area is maintained, to prevent erosion of its character, and enable future development that enhances its character and appearance. It will also provide clarity in terms of which types of development will require planning approval via the planning application process.</p>
<p>Any budget implications relating to the policy?</p>	<p>There will be no changes to resources, the review will be delivered within existing budgets.</p>

POTENTIAL IMPACTS			
EQUALITIES AND SOCIO-ECONOMIC DUTIES – Please Tick ✓ any potential impact(s) identified to each group			
Protected Groups:	Negative	Positive	Considerations
Age	✓	✓	<p>Potential conflict between access and historic buildings for people with disabilities, and for older people who can experience issues with access to buildings due to individual health and/or mobility issues.</p> <p>There are policies in place to enable development/ modifications/ reasonable adjustments to such buildings to allow them to meet the access needs of users.</p> <p>Opportunities for public participation in both the review and subsequent planning application processes for all groups:</p> <ul style="list-style-type: none"> • Where a development would affect the character of a Conservation Area, the relevant application for planning permission will be advertised providing an opportunity for public comment. • For each of the Conservation Area Appraisals undergoing a review the Council will consult widely with the general public via our online engagement platform, providing anyone with an interest in the subject matter to share their views on the content of those reviewed appraisals. A focussed drop in session will also be held in each of those Conservation Areas to give local residents and others with an interest an opportunity to view the details of the review, ask questions and provide comments. All opportunities for engagement will be advertised via the Council’s website and social media channels.
Disability	✓	✓	As above
Gender Reassignment		✓	Opportunities for increased public participation in both the review and subsequent planning application processes for all groups.
Marriage and Civil Partnership		✓	Considerations as above under Gender Reassignment group
Pregnancy and Maternity		✓	Considerations as above under Gender Reassignment group
Race		✓	Considerations as above under Gender Reassignment group
Religion or Belief		✓	Considerations as above under Gender Reassignment group
Sex		✓	Considerations as above under Gender Reassignment group
Sexual Orientation		✓	Considerations as above under Gender Reassignment group

POTENTIAL IMPACTS			
Inequalities arising from socio-economic disadvantage	✓		<p>The review of CAAs does not represent a strategic decision on behalf of the Council, but rather the key objectives and outcomes will be more localised in nature. As such a Fairer Scotland Duty Assessment is not required. However, it is still worth noting the following considerations:</p> <ul style="list-style-type: none"> • There will be costs associated with the maintenance and development within a Conservation Area as additional planning controls are in place to protect the special character of those areas – most forms of development will require the submission of a planning application with associated fees. • In weighing up the additional cost associated with the maintenance and development of properties within Conservation Areas it is also important to consider sustainability and best value; in many instances these additional planning controls can help to ensure value for money as appropriate materials are often more sustainable with a longer life span. • Although the materials used in the construction of traditional properties are often more sustainable and longer lasting, these buildings can be less energy efficient than their modern counterparts, which can lead to higher home heating costs, with potential subsequent impacts on those residents who might already be experiencing fuel poverty. • Various funding options may be available to assist householders with certain types of repairs and/or restoration of listed buildings and unlisted properties within a Conservation Area, as well as making their properties more energy efficient.

EVIDENCE (List of information used to make assessment to date)																																					
Performance Data:	Future development should ensure the integrity of the conservation area is maintained, to prevent erosion of its character, and enable future development that enhances its character and appearance. Proposed changes to the Conservation Area, via the planning application process, will be assessed against the key objectives of the area set out within the relevant CAA and its Management Plan and will be measured against the designation criteria.																																				
Internal Consultation:	Will take place formally as part of the Committee process.																																				
Consultation with Affected Groups:	<p>For each of the Conservation Area Appraisals undergoing a review the Council will consult widely with the general public via our online engagement platform, providing anyone with an interest in the subject matter to share their views on the content of those reviewed appraisals. A focussed drop in session will also be held in each of those Conservation Areas to give local community groups, residents and others with an interest an opportunity to view the details of the review, ask questions and provide comments. All opportunities for engagement will be advertised via the Council's website and social media channels.</p> <p>In addition, we will engage with Historic Environment Scotland and Perth and Kinross Heritage Trust on each appraisal/re-appraisal.</p>																																				
Evidence Sources:	<ul style="list-style-type: none"> Existing Conservation Area Appraisals Data on socio-economic disadvantage – Scottish Index of Multiple Deprivation (2020) tells us that the overall decile rankings (1 being most deprived, 10 being least deprived) for each of the 36 Conservation Areas are: <table border="1"> <thead> <tr> <th>Conservation Area</th> <th>SIMD Overall Ranking (1-10)</th> <th>Conservation Area</th> <th>SIMD Overall Ranking (1-10)</th> </tr> </thead> <tbody> <tr> <td>Aberfeldy</td> <td>Mostly 7 and 8 in parts</td> <td>Kenmore</td> <td>7</td> </tr> <tr> <td>Abernethy</td> <td>Split between 8 and 10</td> <td>Kinnesswood</td> <td>8</td> </tr> <tr> <td>Baledgarno</td> <td>8</td> <td>Kinross</td> <td>Mostly 9, some pockets of 6, 7 and 10</td> </tr> <tr> <td>Birnam</td> <td>Mostly 9 and 6 in places</td> <td>Kinrossie</td> <td>7</td> </tr> <tr> <td>Blair Atholl</td> <td>6</td> <td>Knapp</td> <td>Mostly 7, with small southern pocket of 8</td> </tr> <tr> <td>Blairgowrie</td> <td>Mostly 9 but with a central core of 3</td> <td>Longforan</td> <td>Mostly 8, with western edge 7</td> </tr> <tr> <td>Cleish</td> <td>7</td> <td>Meikleour</td> <td>Split between 6 and 8</td> </tr> <tr> <td>Comrie</td> <td>8 and 9</td> <td>Muthill</td> <td>7</td> </tr> </tbody> </table>	Conservation Area	SIMD Overall Ranking (1-10)	Conservation Area	SIMD Overall Ranking (1-10)	Aberfeldy	Mostly 7 and 8 in parts	Kenmore	7	Abernethy	Split between 8 and 10	Kinnesswood	8	Baledgarno	8	Kinross	Mostly 9, some pockets of 6, 7 and 10	Birnam	Mostly 9 and 6 in places	Kinrossie	7	Blair Atholl	6	Knapp	Mostly 7, with small southern pocket of 8	Blairgowrie	Mostly 9 but with a central core of 3	Longforan	Mostly 8, with western edge 7	Cleish	7	Meikleour	Split between 6 and 8	Comrie	8 and 9	Muthill	7
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EVIDENCE (List of information used to make assessment to date)

Coupar Angus	Mostly 6 but northern tip is 3	Moulin	Mostly 7, with small southern tip 9
Crieff	Split between rankings 5, 6, 7, 9 and 10	Perth Central	Split between 2 - 5
Dunkeld	Mostly 6 with small western portion 8	Perth Kinnoull	Mostly 4, some parts 5 and some 8
Dunning	7 and 8	Pitcairngreen	7
Errol	Mostly 7 with some 6	Pitlochry	Split between 8 and 9
Forgandenny	8	Rait	7
Fortingall	5	Scotlandwell	Mostly 9, small pockets of 8
Fowlis Wester	6	Spittalfield	7
Grandtully and Strathtay	7	St. Fillans	8
Inchture	Mostly 7, some parts 8	Wester Balgedie	9

- Comments received through consultation and engagement processes
- [Our Past, Our Future: The Strategy for Scotland's Historic Environment 2023](#)
- [Historic Environment Policy for Scotland \(HEPS\) 2019](#)
- ['Managing Change in the Historic Environment'](#)
- [Historic Environment Scotland Circular: Regulations and Procedures](#)
- [A Guide to Climate Change Impacts](#)

Evidence Gaps (any further information needed to complete evidence above)

Feedback from stakeholders as part of the engagement process for the review of each of the CAAs.

Mitigating Action(s) – Can the impact(s) identified previously be lessened in any way?

- No additional mitigating actions identified over and above those already mentioned i.e. –
- Existing policies in place to enable development/ modifications/ reasonable adjustments to historic buildings to allow them to meet the access needs of users.
 - Various funding options may be available to assist householders with certain types of repairs and/or restoration of listed buildings and unlisted properties within a Conservation Area, as well as making their properties more energy efficient.

EVIDENCE (List of information used to make assessment to date)

Justification:

The review will help Perth and Kinross Council to meet our duty under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 in respect of Conservation Areas. It will ensure that the existing Conservation Area boundaries are fit for purpose, and the areas meet the criteria for designation, and incorporate a reflection on the role of Conservation Areas in delivering the Council's priorities in respect of sustainable economic development, climate change, and the need to preserve and enhance the built heritage of Perth and Kinross, in accordance with local and national planning policy.

Whilst there is the potential for some negative impacts on people with disabilities and older people linked to access to and within these properties, there are policies in place which allow for modifications/ reasonable adjustments to such buildings to provide improved access for users.

The additional costs associated with maintenance and development within a Conservation Area, due to the need for planning permission, alongside often more expensive appropriate materials, must be weighed up against the achievement of sustainability and best value through protecting the integrity and special characteristics of these areas for current and future generations. Furthermore, the preservation of our historic environment brings associated economic benefits in terms of tourism and employment, as well as improving the quality of life of residents and visitors; promoting a sense of place, identity and community, and supporting sustainable communities.

Finally, whilst traditional properties can be less energy efficient than modern developments, which may impact those already experiencing fuel poverty, there are different funding options, as well as advice for owners, to assist householders with certain types of restoration and/or repairs to these buildings to improve their energy efficiency. Historic Environment Scotland has a range of guides relating to energy efficiency and traditional buildings to help households make energy savings.

IMPACT SUMMARY	Please Tick ✓
Some potential negative impacts have been identified in terms of the Council's Public Sector Equality Duty (PSED) in relations to:	
- Reducing discrimination, harassment, victimisation	
- Promoting equality of opportunity	✓
- Fostering good relations	
Negative impacts can be mitigated	
Negative impacts cannot be fully mitigated but are justified	✓
Negative impacts cannot be fully mitigated or justified	
Further consultation with affected groups is needed	
It is advised not to go ahead with the proposals	

DECISION FOR INTERIM INTEGRATED APPRAISAL (Rationale for deciding to proceed with the proposal or not)	
<p>There is a statutory requirement for the Council to fulfil its duty with respect to Conservation Areas under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. As such the production of up to date Conservation Area Appraisals is necessary, and there are no alternative options available to the Council. Whilst there may be the potential for some negative impacts on some of the protected characteristics groups, which can be mitigated to a certain extent in terms of reasonable adjustments, it will not be possible to fully mitigate in all instances without resulting in detrimental impacts on the integrity and special characters of these areas.</p>	
Date of Interim Decision:	28.05.26