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Dear Sirs

National Planning Framework 3: Consultation response

Built Environment Forum Scotland (BEFS) is a forum that brings together non-governmental organisations with a built environment remit and acts as national intermediary for Scotland's historic environment sector. Through its member organisations, BEFS connects with over 325,000 individuals through 300 organisations.

In responding to the consultation BEFS focused on this section: a successful sustainable place. Comments are drawn largely from contributions made at a BEFS workshop held on 25 June 2013 on the topic.

General Comments

Sustainable economic growth: NPF3 is very much focused on economic growth. BEFS members advocate that social and environmental objectives make a fundamental contribution to the economic driver and must carry equal weight if growth is to be truly sustainable. Reference was made in a recent parliamentary debate on NPF3 and SPP to the following definition of 'Sustainable Economic Growth' as being "the upward trend in Environmentally Adjusted Net Domestic Product (EDP) under certain conditions and assumptions" (Organisation for Economic Co-operation and Development). This highlights the environmental imperative in economic growth.

Cumulative impact of small scale: There is a need for recognition at the most strategic (and statutory) level (ie NPF3) of the value of the cumulative impact of smaller initiatives. At the BEFS workshop reference was made to the Central Scotland Green Network (CSGN) as a national

development that pulls together many players/initiatives. This could be a relevant approach in promoting the collective impact of cultural heritage initiatives.

Influence: As the spatial strategy for development in Scotland NPF3 should influence other strategic plans and priorities (such as the Infrastructure Investment Plan and National Marine Plan).

Style and Joined-up policy: We welcome the objective of the NPF3 being a more concise, usable and attractive document – written in language to suit the needs of the target audience(s).

Q11: Reinvigorating existing places

Adaptation thinking: As currently drafted the NPF places a lot of emphasis on new development, but what does it mean for transformation/adaption? Members of BEFS would welcome further detail at this strategic level on adaptation of the existing built environment, highlighting the re-use of existing settlements as a good use of resources.

Settlement Strategy: What is the overall strategy for settlements across all scales? The document indicates high density development and clustering as approaches – clarity is sought on how these approaches are to be applied at different scales/ in different contexts.

Local equity: The NPF ought to provide a stronger emphasis around outcomes for people. The ethos of 'local' and objective of local equity (retaining investment in places, fostering specialist services, enabling communities to help themselves) needs to be recognised at this top, most strategic (and statutory) level. Although delivered via the local plan, the importance and principle of generating and sustaining activity and investment within places needs to be expressed in the NPF. There is a need for a more rounded picture at local level, integrating with community planning and learning from experiences in transition towns.

Cultural heritage/tourism: members of BEFS would welcome more recognition at this strategic level on the importance of Scotland's cultural heritage (including Scotland's five World Heritage Sites of international standing) and the significant value that heritage sites and the wider historic environment brings in terms of tourism appeal. See the comment under 'General Comments' above on the cumulative impact of smaller initiatives – and scope to use an approach such as CSGN to recognise and manage the overall impact of cultural heritage across Scotland.

Q12: Contribution to health and wellbeing through placemaking

Access to green space: If densification is a strategic approach being advocated through the document, this needs to balance with other objectives such as access to green space (since the development of green space in urban areas is one way to achieve higher density development). The quality of, and distance to, green space are relevant factors (the Greenspace Scotland website makes reference to various research reports on this theme).

Q13: Delivering sufficient homes

Shift away from market driven approach: We need to shift away from a market driven approach to satisfying housing need; as the spatial strategy for development the NPF should influence, rather than respond to, market-led pressure. The system of land allocation needs to be 'unblocked'; undeveloped consented land creating distortion which needs to be addressed.

I hope that these points are helpful. Please get in touch if you would like to explore these views further. We would be grateful if you would keep us informed of developments relating to this consultation.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jo Robertson', written in a cursive style.

Jo Robertson
Senior Policy Officer – Historic Environment