

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment.

*Should permitted development rights be extended, measures need to be just and equitable, ensuring quality place-making and, where appropriate, aligning to Historic Environment Policy for Scotland (HEPS).*

*Whilst it is easy to call for exemptions to enable designated heritage to potentially be protected, BEFS remains concerned that just and equitable measures ensuring quality place-making may be over-ridden by many suggested changes to PDRs; with incremental changes producing undesirable effects over the longer-term.*

*BEFS looks forward to responding more fully in relation to specific development types and appreciates that the Sustainability Appraisal is mindful of many potentially negative effects for the historic built environment, and our places more generally. Many minor negative effects are noted – and whilst each may be minor, the entire picture should be considered, and the cumulative effects are worthy of greater attention.*

*For the heritage sector (and more widely) any changes to PDRs will be about a balance being made; a balance between climactic, economic and, social and heritage aspects; both through policy and practice. Appropriate assessment, and related training, will be integral for judgements to be made with accuracy and effectiveness.*

*BEFS hope that where significant negative impact for cultural heritage has been assessed the current protections will stand, with applications being necessary and decisions being made based on individual circumstances and appropriate interventions. Anecdotal evidence from changes in England have suggested that cumulative impacts are not being fully taken into account. PDR changes can reduce opportunities to assess heritage impacts appropriately.*

BEFS also Support RTPI's response in relation to Question 3 c

### Town Centres

In addition to serious concerns about the negative social impacts of applying PDRs to commercial to residential conversions, RTPI Scotland notes that successful town centre regeneration normally depends on proactive and collaborative policy making and implementation. There are many examples throughout Scotland where local authorities, communities and businesses have worked together on long term projects to improve the economic and social viability of town centres. Conservation Area Regeneration Schemes have often played an important role in these alliances. RTPI Scotland believes that applying wider PDRs generically to town centres could undermine such efforts, and result in more ad hoc and uncoordinated changes.

The Institute suggests that instead the possibility of introducing a 'town centres use class' to the Use Classes Order could be explored instead. This could sit well alongside work on how to most effectively regulate short term lets, and would give an opportunity to look in more detail at balancing flexibility for town centre occupants with proactive efforts to improve the sustainability of Scotland's town centres and high streets.

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### RESPONDENT INFORMATION

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Responding on behalf of an Organisation - **BEFS** (Built Environment Forum Scotland)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? **YES**