

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. BEFS is a member of the [Climate Heritage Network](#) steering group.

BEFS responds, mindful that the changes proposed are technical changes, time-limited, designed to make the reading of the current SPP more accurately reflect the aims and policy intentions. BEFS will respond to the full consultation of the new National Planning Framework (NPF4) in due course.

BEFS issues the following statement and considers that: the proposed changes are positive, and BEFS supports a plan led system which maintains the historic environment as a key material consideration in decision making; but seeks that further consideration is given when calculating land supply - taking into account empty homes, unused buildings, and Vacant/Derelict land as this would give both a more accurate picture of the state of potential housing provision, and provide greater scope for a wider-range of housing solutions.

BEFS notes the changes re: ‘established housing land supply’ and reiterates that there is hope the definition is designed to, and does, include brownfield land, historic buildings with capacity for conversion to housing, and enables more Vacant and Derelict land to be considered within the calculations.

It should also be noted that housing numbers alone are not the only barrier to citizens gaining suitable housing. The state of repair, ownership models, and well-connected housing sites with appropriate facilities, all have a part to play in homes suitable to individual need being available.

Consideration of ‘sustainability’ is rightly prominent within the policies, but it is not just a series of line entries on a spreadsheet examining energy values and materials used; true sustainability considers the impact on people and places, enhancing places and opportunities – ensuring the homes and places built remain desirable for generations – not just useful for the short-term.

The proposed amendments are consistent with the implementation of the Place Principle as adopted by Scottish Government.

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:

<https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

Name: Ailsa Macfarlane, Policy and Strategy Manager

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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**

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**