

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.

## 1. Do you agree with our current thinking on planning for net-zero emissions?

Extremely supportive of the primacy of this aim.

Extremely positive about strengthening and changing carbon assessment and consideration for lifecycle assessments.

Elsewhere within Scottish Government National Developments are set-out, but there does not appear to be criteria for those transparently available. How do those projects fit into a green recovery, and how can that process be considered in a more transparent and objective way within the context of National Planning?

The Statement acknowledges that planning needs to work with building standards/ building control. This step is seen as beneficial. BEFS is aware that building control can be an impediment to plans for retrofit being achieved. Further indicative policies are needed in this area. Technology will change (sometimes at speed) so these policies need to be model policies around latest-best-practice – rather than prescriptive. HES has much high quality research in this area which could help inform policy.

The *Heat in Buildings* draft Strategy (p27) considers traditional and heritage buildings, and commits to working with HES and stakeholders on appropriate technological and regulatory solutions. The NPF4 could do likewise.

Concerns remain over net-zero aims being used to justify new-build and development over reuse/retrofit and adaptation. It is hoped that the reassessment, and then application of, Carbon Assessment will help to dispel those fears. The sector is keen to work with Scottish Government on this. It is also assumed that the NPF4 will align with the Infrastructure Commission approach, where existing homes are part of our infrastructure, thereby highlighting the need to maintain what we have, not just put in measures to maintain what we build-  
anew.

## 2. Do you agree with our current thinking on planning for resilient communities?

Quality is mentioned, this is a positive step. The Place principle appears to be embedded, and the support for health outcomes and preventative spend are all extremely encouraging.

Developer contributions will be key within this area. Perhaps even more so in the current/onward financial climate. The mechanisms for delivery are not identified. There is no reference to the work of the Scottish Land Commission on Land Value capture, for example. This does not promote the certainty which could bolster both Public Spending confidence and Private Investment.

The principle of Maintenance appears built into greenspace. BEFS would strongly advocate that this principle be widened to all of our designed and built environment. Maintenance is a strong step towards using what we already have, protecting that carbon-spend and providing a keystone to achieving net-zero.

Undesignated assets have a strong role in place-making, how can we go about improving that contribution and understanding? Currently Local Development Plan policies provide the detail for undesignated assets.

Designated assets could be provided some understanding/protection through Heritage Impact Assessments. However, the tendency for HIA to see the asset in isolation redacts the narrative of place to individual items and negates how asset and place form a whole. Local Place Plan information and public engagement could meaningfully help to inform the HIA and add significant value.

The Local Place Plan process - and engagement with communities and places - can help to develop an understanding of what is important to people, within their places. This process needs to be used and resourced.

The AGER Higgins report argues that post-covid economic recovery strategy should have a strong regional dimension. Localism and the regional dimension are not yet fully articulated within the NPF4 context.

### 3. Do you agree with our current thinking on planning for a wellbeing economy?

Yes – the wellbeing economy is many inter-related facets that BEFS broadly supports. BEFS is a member of the Wellbeing Alliance Scotland.

Prioritising waste prevention, encouraging a growing circular economy, providing wider uses for historic buildings and embracing the potential of Vacant and Derelict land are all extremely positive.

Within this context there is much to be achieved and without a clear hierarchy of Strategies, Plans, and implementation and delivery programme, the result may be a number of Government departments all making their case for the same limited resources and parcels of seemingly profitable land.

Our existing places can demonstrate their contribution to a wellbeing economy and fair work. The maintenance, management, protection, retro-fitting, and conservation of the historic environment is a huge source of skilled jobs. Skills is an area which should be addressed through the Delivery Plan. The issues relating to the skills pipeline needs to be urgently addressed if the right people, are to have the right skills, at the right time, to support the Outcomes fully. The sector [Skills Investment Plan](#) for Scotland's Historic Environment Sector details further information on the skills challenges and opportunities for the historic environment sector. Job creation within this sector not only helps the wellbeing economy, but helps to deliver on net-zero ambitions, as well as providing greener places for our communities.

The benefits of the historic environment are clearly spelt out within this section. However, this section appears to bring the greatest risk of unintended consequences.

Greater flexibility is needed, but potential harms still need to be protected against (and without the security of what, and how, Scottish Planning Policy may be incorporated into NPF4 the concerns loom large. Page 28 mentions the *best use of existing buildings* but does not make clear how this value judgement will be made.

The *managed approach to tourism* is designed to support sustainable tourism. The priorities for that are taken from the Tourism Strategy which was launched before the pandemic. The level of economic and regulatory flux in this sector is likely to mean that the topic will need revisiting.

### 4. Do you agree with our current thinking on planning for better, greener places?

BEFS supports better, greener places and sees many positive concepts within this section. From mentioning the design elements of public realm, to the necessity to have quality and cared for places.

Locally important buildings are highlighted. These non-designated assets enjoy little protection beyond the polices found within Local Development Plans (mentioned earlier in BEFS response). Page 36 speaks of *clarifying our policies on locally important built and natural assets where required. As well as maintaining, strengthening and clarifying our policies for the historic environment* - BEFS is keen to work with the sector and Scottish Government on these polices to ensure clarity.

For existing known assets Heritage Impact Assessments become mandatory – concerns have been raised over how the appropriate expertise and neutrality of these assessments will be assured. There is perhaps scope to develop model baseline approaches. The referencing of existing standards (such as BS 7913) may be useful within this context.

Use and re-use where appropriate of our historic buildings is mentioned. This appears to reflect carbon considerations, but “appropriate” needs to be clearly defined as this could be problematic from both the perspective of a future user and/or one wishing to maintain the status quo.

BEFS is hearing concerns from across the sector as to where planners and roles within local authority teams dealing with heritage will point decision makers. The *Heat in Buildings* draft Strategy mentions the protections that SPP provides (p58) - NPF4 needs to enable the same care and protection measures going forward.

What policy and statutory documents will provide the information needed to enable the care, protection and enhancement of our places? These concerns expand at times to ask for clarity in policy over roles and responsibilities. This clarity could be provided in NPF4.

Many ideas in this section appear at odds with the speed/number measures of planning performance in the Planning (Scotland) Act. The NPF4 should enable a change in outcome. Instead of economic considerations pushing decision makers to ask, *Is it bad enough to refuse?* The wider system needs to support and empower those to ask: *Is it good enough to permit?*

## 5. Do you have further suggestions on how we can deliver our strategy?

The ambition is to be applauded. The Delivery Plan, it is hoped, will flesh-out the process. Until then, the short summation of delivery within the Statement seems overly optimistic in tone. Local authorities appear to be tasked with providing more, with potentially reduced resource. Evidence and appraisals will do much of the groundwork – but the questions remain who, and how? And when in the financial cycle do these happen - is this front-end costs for planning and local authorities?

Private sector investment is expected, but contraction within this sector too cannot be ruled out, particularly in current pandemic and post-Brexit circumstances.

From a development management perspective, which policies and strategies will have primacy? *Alignment* is useful but does not provide a hierarchy. Local Place Plans are mentioned as important, but it is difficult to see how they play a meaningful role in such a crowded policy and strategy landscape.

Several times the Statement seeks to develop policy clarity. Clarity of policy will aid delivery and provide some of the certainty both public and private investment seek.

For heritage, questions remain as to how NPF4 policy will reflect Scottish Planning Policy, specifics such as PAN2/2011, what role the Historic Environment Record will have – and whether the points at which policies are tested have been fully considered?

BEFS previously [researched](#) what policies were referred to by Reporters when making planning decisions in relation to Listed Buildings. Local Development Plan policies were by far the most used. This demonstrates the importance, the place they play in protecting our places. What robust mechanisms can fill this role?

BEFS is working with Members on Model-Policy suggestions which cover the essential aspects of Retain, Protect, Conserve, Enhance – and do no damage, found across Authority Planning policies.

It is noted that policy should be National, but with potential for Local application.

For example, Aberdeen has a specific policy on Granite.

Could this be replaced with a model policy on local materials enhancing, preserving and protecting local character?

Should this be widened to reflect the ambition for net-zero; should locality of materials, and re-use of materials be specified for carbon, and character?

## 6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

No Comment

## 7. Do you have any other comments on the content of the Position Statement?

Whilst is extensive support for: the aims of the statement, the desire for ambition, as well as connecting the many national strategies and plans; concerns remain.

How to deliver such ambition and find genuine alignment between such a raft of interconnected polices, as well as meeting a number of stated *first-principles* seems severely challenging. Commitments to enable delivery will be necessary, and BEFS welcomes the forthcoming Delivery Plan.

Overall, there appears to be good historic environment representation. And BEFS Membership understand the desire for streamlining. There is a renewed desire to ensure the future NPF document can provide the necessary, robust, framework; including reviewed and refreshed information from SPP – drawing across what best performs and is fit for purpose, now and in the future.

The Statement expresses well the strength of the Natural Environment – questions remain over how the Historic Environment is seen as relating to rural and natural environment issues. There is a broader character of landscape and place to be considered, a landscape formed through natural and human interaction.

The Statement has translated what has been submitted from a number of Member stakeholders previously with many positive outcomes. Now is the time to usefully build upon that, ensuring clear heritage policies are in place, providing national clarity and coverage, with the ability for local application.

Mechanisms and solutions for change require more fleshing out. Many statements in relation to *strengthening public sector confidence*, and, *providing leverage for private-sector investment*, ring hollow without substantially more detail attached to them.

These policies and mechanisms need to ensure a balance of outcomes; further aligned to the National Performance Framework, and those national outcomes. Enabling an appreciation of the narrative of places

and their inhabitants, not just spotlighting individual sites; enhancing this understanding through both community and professional engagement. The appropriate consideration of *how carbon assessments can ensure that the carbon stored in buildings is accounted for in decision making* – will be central to our existing built environment fulfilling its central role in both the ambition of net-zero and as a key part of existing infrastructure.

Development Plans were seen as the important primary mechanism, but questions remain around the relationship between regional land use strategies, other regional approaches and local authorities. Regional Land Use now seems to direct towards strategies and not planning.

BEFS has drawn together the [existing heritage policies](#) in all local development plans and is now drafting, with members, suggestions - which focus on what cannot afford to be lost from these existing policies – examining where heritage protections are tested, and taking a pro-active, model-policy approach. BEFS hopes to work with the Scottish Government and stakeholders on future developments and iteration of the NPF4.

During the passage of the Planning (Scotland) Act 2019, there was much debate around assessing planning performance on the basis of speed and numbers, rather than the quality of outcome or decision. Here, policy has an opportunity to reach for the ambition of quality.

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**RESPONDENT INFORMATION:**

**Name:** Ailsa Macfarlane, Policy and Strategy Manager

**Email:** [amacfarlane@bef.s.org.uk](mailto:amacfarlane@bef.s.org.uk)

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

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