

New realities of retail and ecommerce in Scotland – Call for Views

16 March 2022

Built Environment Forum Scotland (BEFS) is the 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 supporting member of the [Climate Heritage Network](https://climateheritage.org) <https://climateheritage.org>.

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BEFS Statement:

BEFS welcomes this consultation on the new realities of retail and ecommerce in Scotland.

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

[NPF4 COMMITTEE FOR LOCAL GOVERNMENT, HOUSING AND PLANNING – CALL FOR VIEWS \(10/01/2022\)](#)

[PROPOSALS FOR REGULATIONS ON LOCAL PLACE PLANS CONSULTATION – \(25/06/2021\)](#)

[TOWN CENTRE ACTION PLAN REVIEW – CALL FOR EVIDENCE \(18/08/2020\)](#)

BEFS response will focus on the following questions only:

Keeping town centres alive

1. How are Scottish high streets and town centres changing? What are the strengths and weaknesses of Scotland's town centres?

Scotland's high streets and town centres have seen much change over a number of years. Challenges include the reduction in retail, reduction in required office space, and the changes to the way we use our places brought by the effects of the pandemic.

Town centres can provide hub activities and reduced commuting – recent consultations on the draft National Planning Framework (NPF4) and Local Development Plans (LDP) Guidance and Regulations extol the benefits of 20 minute neighbourhoods: high streets and town centres as hubs can harness our existing built environment as services, businesses, homes and infrastructure - reusing and reinvigorating our distinctive places.

BEFS notes the following comments by Scotland's Town Partnerships as part of their response to this call for views:

'The rise of online shopping - coupled with the decades-long damage caused by the proliferation of out-of-town developments, encouraging increased use of cars - has been forcing a change in our high streets and town centres for a number of years ...At a time when people have spent more time at home than ever, the pandemic has brought into sharp focus the need for our towns and has encouraged a hyperlocal approach, which has allowed many to view their towns and high streets differently - truly seeing how much is on their doorstep, along with the need to be there for those who went above and beyond to be there for them when they have needed them most. To realise the potential which exists in our towns, we need to encourage a collaborative approach for all to make them great places to live, work, play and ensure they are fit for future purpose. Our people, the planet and the economy will all benefit from thriving, environmentally-friendly towns.'

2. How do we encourage people to live in town centres? What types of policies are needed?

To achieve this it is important to recognise the existing built environment as a valuable national asset; Scotland's high streets and historic town centres have a role to play across the board, within sustainable development, homes, jobs and infrastructure and wellbeing. The draft NPF4 and LDP consultations' spatial strategies focus on liveable, sustainable, productive and distinctive places – a holistic view of what makes good places is welcome and can be enabled through the planning system. BEFS would also refer to the [Place Principle](#) and the [Place Standard](#) as tools for creating good places.

STP remark on the following: *'It's clear that NPF4, the Town Centre Action Plan and Housing to 2040 documents all help set the policy intent in terms of town centre living and mixed-use communities. Delivery could be supported by resource from the Place-Based Investment Programme and Levelling Up agenda, with the Scottish National Investment Bank utilised on a programme scale.'*

3. How can equality and diversity issues be addressed in policies that create and sustain resilient town centres?

When communities are empowered they enjoy higher democratic participation, an increase in confidence and skills among local people, higher numbers of people volunteering in their community and more satisfaction with quality of life within the neighbourhood; leading to the delivery of better, more responsive services and better outcomes for communities.

Community empowerment and asset transfer are legislative acts of the Scottish Parliament intended to enable communities to have more control of the places in which they live and the services delivered there. Applied to town centres, the reuse of existing built assets and meanwhile use of vacant buildings and spaces can create engaged, equitable and resilient town centres and communities.

4. Independent and small businesses, and community and co-operative operations enhance local resilience and wellbeing but can often be marginalised in town centres. How can this be changed?

BEFS would here highlight the work of Scotland's Towns Partnerships, in particular the [Scotland Loves Local](#) campaign: *'The Scotland Loves Local campaign has played a considerable role in encouraging people to think, choose and spend locally throughout the pandemic. Our hope is that this programme - and others like it - continue to encourage people to show their support for businesses of all kinds in their communities in the long-term, prioritising supporting them.'*

5. What is the role of culture and leisure in town centres? How can these be leveraged to increase wellbeing?

Our existing built and historic environment is an agent of green recovery and regeneration – but it is also central to our sense of place and identity as part of our culture and heritage, and the distinctiveness of Scotland's towns. Our built environment is a valuable national asset and has a key part to play as:

- a focal point of regenerative strategies (particularly in relation to High Street decline, and Town Centre Regeneration) enabling a sense of place – whilst providing skilled employment, places designed to promote wellbeing, and adaptive buildings suited to new futures.
- central to a potentially expanding skilled workforce, maintaining and appropriately adapting our environment for the long term economic and environmental benefits to people and place.

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- a growing employment market – where repairing, reusing and adapting our built environment is central to a green recovery and towards net zero.
- an important link in the materials supply chain – supporting a wide range of related industries.
- a factor for putting more existing homes into use, as empty homes are brought back into use.
- a key resource, essential to Scotland’s tourism offer – further energising local economies and securing future employment across a wide range of industries and employers.

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6. Who or what can drive change in Scottish town centres?

Our existing built environment – a key component of high streets and town centres across the country - is the best resource we have for making climate-positive, socially-just responses to economic and social changes. These positive changes need both political will, community engagement, and leadership implementing and resourcing policy and strategy.

7. Can you provide examples of best practice and success stories, in the UK and/or internationally, of creating living and resilient town centres?

Relevant schemes include:

- Townscape Heritage Initiatives (THI)
- [Conservation Area Regeneration Schemes \(CARS\)](#)
- [Traditional Buildings Healthcheck](#)

Further positive examples - including those covering arts ,culture, streets and spaces, enterprise, the environment and community - can be found on the STP [Town Toolkit](#) platform.

8. If not covered elsewhere, what other policy interventions would you like to see to create living and resilient town centres?

The climate emergency demands careful stewardship of our precious resources. To enable this, policies to incentivise a culture change, driving maintenance, retention, reuse and repurposing of existing heritage assets rather than replace or dispose of them would be welcome.

A programme of maintenance for our existing built environment, suitably adapting our built assets enhances high streets and town centres and supports all of the principles suggested; it supports skilled work and new jobs; it demonstrates an investment in using what we already have; it makes our places more resilient; and the economic investment would be directly supporting reduced emissions (a wind and watertight home is far more energy efficient, even without retrofit adaptations).

BEFS would also point to the Infrastructure Commission Report [Infrastructure Commission’s Recommendations](#) around existing assets and the investment hierarchy.

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

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Address and Postcode: 61 Dublin Street, Edinburgh, EH3 6NL

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**

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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**