

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 existing built environment. BEFS is a supporting member of the [Climate Heritage Network](#),

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

- [BUILDING COMMUNITY WEALTH IN SCOTLAND \(09/05/2023\)](#)
BEFS supports action and initiatives that enable and support communities to benefit from their places and spaces. Adapting, repurposing, and reusing our current building stock presents enormous opportunities for skilled employment, carbon solutions, good places, healthy town centres and more homes; solutions which provide benefits to economy, people and place.
- [DRAFT NATIONAL PLANNING FRAMEWORK 4 \(NPF4\) CONSULTATION \(31/03/22\)](#)
- [LOCAL DEVELOPMENT PLANNING – REGULATIONS AND GUIDANCE CONSULTATION \(31/03/22\)](#)
- [PROPOSALS FOR REGULATIONS ON LOCAL PLACE PLANS CONSULTATION – \(25/06/2021\)](#)
- [TOWN CENTRE ACTION PLAN REVIEW – CALL FOR EVIDENCE \(18/08/2020\)](#)

1. How helpful is part 1 of the guidance in furthering the understanding of local living and 20 minute neighbourhoods in a Scottish context?

[Part 1 - Local living, the benefits of local living and 20 minute neighbourhoods.](#)

Very helpful

BEFS considers the benefits of local living and 20 minute neighbourhoods to be well laid out with clear links to the Place Principle, Scotland's National Performance Framework and UN Sustainable Development Goals - and the need for this guidance to help deliver the policies as set out in National Planning Framework 4 (NPF4) Policy 15.

However, for this to be successful the '**Collaborate, plan, design** - developing collaborative models of working to inform place-based planning and design processes' must seek to understand how these policies are viewed and understood by the communities affected by them. The benefits are well laid out in this guidance and BEFS would support further advocacy and communication of the advantages at a community and local level.

2. How helpful is the framework diagram in encouraging flexible, place-based approaches to support local living?

[Part 2 of draft guidance - local living framework diagram](#)

Very helpful

The diagram is a clear and concise tool to quickly communicate the essence and interconnected nature of the principles involved in flexible, place-based approaches to local living; understanding that the detail sits within the guidance.

3. Looking at part 2 of the draft guidance: how helpful are the 'categories' and 'key considerations for local living' that are captured within this part of the document?

Part 2: Categories and key considerations

Somewhat helpful

BEFS considers the categories and sub-themes to be holistic and well selected and welcomes the consistency of approach and language in links to the Place Standard Tool.

BEFS has regularly advocated that the historic environment and existing built environment has a role to play within sustainable development, homes, jobs and infrastructure, and for recognition of the benefits of existing buildings and infrastructure (and the embodied energy inherent in them) towards achieving net-zero. As such we note and welcome *'the consideration of contextual information such as culture, heritage, topography, existing built form and landscape character is important to deliver successful local living...'* and in particular that *'...re-purposing of existing underused buildings, buildings at risk, spaces or landmarks can help preserve the local identity and character of a place'* within the Civic category. This could however read across into other categories more strongly – such as Space and Stewardship - contributing to Scottish Government's approach to delivering good places as outline in the qualities of successful places below:

- **Distinctive**
- **Sustainable**
- **Adaptable**
- Healthy
- Pleasant
- Connected

There is also the opportunity for stronger ties to maintenance and re-use, currently well represented as part of the Stewardship category, to wider climate and environmental benefits identified in other categories and benefits sections of the guidance; with clarity towards how Local Living supports the practical implementation of the policies set out within NPF4: *'Addressing the climate emergency and nature crisis requires us to ensure that existing assets are maintained and capitalised on, limiting adverse environmental impacts and waste. Land and buildings that are vacant and derelict can be a blight on communities and disincentivise investment. NPF4 sets out a policy intent to encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development. Community activity and ownership can also encourage and allow local people to participate in the care and maintenance of their local areas and buildings.'*

BEFS applauds the overarching strong steer towards re-use, which could be further strengthened by clearer alignment to Infrastructure Investment Plan recommendations on existing housing, specifically 'enhancing and maintaining existing assets ahead of new build'. [From the Infrastructure Commission for Scotland, Key findings Report](#): in Key Recommendations for Place *'Assessments of existing and currently planned investment that could impact on this strategic housing demand profile through effective utilisation of existing assets'*.

The guidance is clear that each neighbourhood and area will have different needs and requirements and that the context for local living will be different in rural and urban settings. We welcome the recognition that in rural settings in particular *'where the geographical context is complex and varied, the aspiration and focus needs to be on enabling people to have access to the services, amenities and facilities needed for a full life. **The 20 minutes should not be considered as the defining or limiting factor for local living in any context but***

as a useful gauge of the aspiration around access and proximity to services within a neighbourhood to enable people to live well locally.’ We would suggest that the ‘20 minute’ label could be seen by some users of the guidance as a limitation and would suggest that the emphasis on access to services, amenities and facilities could be made more strongly also within an urban context to fully support that one size can’t, and won’t, fit all.

4. How helpful is the proposed 'structured approach' for use?

[A structured approach to delivering local living.](#)

Somewhat helpful

This approach will be useful for some users of the guidance at a planning and policy level, but perhaps less effective at a local, more granular level – however BEFS recognises the difficulty of providing guidance without being overly prescriptive. In general, further detail and depth - in particular around the reviewing and monitoring processes - would be useful.

BEFS welcomes that consultation and collaboration are central to the approach - but would note that these bring associated resource pressures.

5. Does part 3 of the guidance clearly communicate the importance of both qualitative and quantitative data in establishing a baseline for a place?

[Part 3 - Ways to support local living and 20 minute neighbourhoods; key step 1 - understand the context](#)

Very useful

BEFS has previously advocated for the importance of good data to enable good and holistic decision making for people and places and welcomes the recognition in this guidance of the importance of both qualitative and quantitative data.

Here BEFS would support SURF’s reflection that *‘there is too great a reliance on mapping, and not enough on the lived experience and local behaviour. Putting pins in a map to measure how close an amenity is in walking/cycling distance, is too simplistic to understand whether a place is, or isn’t, a 20 minute neighbourhood.’*

For Local Authorities to truly capture and understand local views on what makes places special, appropriate resource and capacity will be crucial. Similarly, BEFS considers that the role of Local Place Plans to support 20 minute neighbourhoods can only be made manifest if plans are appropriately resourced.

Historic Environment Scotland’s [Talking About Heritage](#) guide is an example of how communities and individuals can celebrate and identify the heritage that is important to them in their places and spaces.

BEFS has long championed greater access, and availability to quantitative data about our places. Please see the jointly commissioned (BEFS and David Hume Institute) [report on enhancing Scotland’s Land Information system](#) to understand why we need to know more about the materials, age, and condition of all our built environment to be able to model for future skills and material needs – as well as to be able to meet net zero ambitions.

This drive for greater evidence is also supported as one of the solutions within the recent [Building Futures report](#) released as part of the *10 Big Climate Solutions* series by the Royal Scottish Geographical Society.

6. How helpful is the 'collaborate, plan, design' section of part 3 in supporting collaborative practices?

[Part 3 - Ways to support local living and 20 minute neighbourhoods - key step 2 - collaborate, plan, design](#)

Somewhat helpful

BEFS would consider that whilst the collaborative approach is to be encouraged that there remain questions around delivery and how this can be implemented and resourced, enacting meaningful change through regional policy, Local Development Plans and Local Place Plans.

BEFS strongly supports SURF's view that *'the Place Principle, local living and 20 minute neighbourhoods as interwoven concepts that must be implemented together, backed by serious commitments and resources from multiple players, to produce progress on the ground.'*

7. How helpful is the 'implement and review' section of part 3 in assisting the delivery of collaborative approaches to support local living?

[Part 3 - Ways to support local living and 20 minute neighbourhoods - key step 3 - implement and review](#)

Somewhat helpful

Here BEFS would reiterate comments made previously and considers that whilst the collaborative approach is to be encouraged that there remain questions around delivery and how this can be implemented and resourced, enacting meaningful change through regional policy, Local Development Plans and Local Place Plans

Further, BEFS notes and supports the view held by SURF that this *'This section makes a brief reference to planning application decisions, and the value of reviewing and monitoring processes, but would benefit from further depth and use of examples, especially with regard to the type of monitoring processes that can benefit longer term arrangements.'*

For the guidance to carry weight, it must give planning authorities the confidence to reject applications where community engagement and collaboration is insufficient. SURF stakeholders often point to the reality that more than 95% of planning applications are approved annually, and regularly cite specific proposals, including out-of-town mixed use developments and isolated new-build housing, which receive approval despite apparently running counter to policy intentions for more 20 minute neighbourhoods.'

8. Looking at part 4 of the draft guidance: do the case studies provide a useful and appropriate range of examples of good practice?

Yes

The examples are wide ranging and comprehensive – it was a pleasure to read about such interesting projects.

9. Looking at the impact assessment update report: do you have any views about the initial conclusions of the impact assessment update report that accompany and inform this guidance?

Local Living and 20 Minute Neighbourhoods

20/07/2023

No comment.

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

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

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RESPONDENT INFORMATION

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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**