

Ambitions for the Planning System

01/12/2023

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 supporting member of the [Climate Heritage Network](#).

Page | 1

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

MANDATORY TRAINING ON PLANNING FOR ELECTED MEMBERS (26/10/2023)

BEFS fully supports the proposal for mandatory training on planning for elected members. We would consider that good decision making for people and places recognises the National Planning Framework 4 (NPF4) view that *'Scotland's rich heritage, culture and outstanding environment are national assets which support our economy, identity, health and wellbeing'*, delivering against the spatial principles within NPF4.

EFFECTIVE COMMUNITY ENGAGEMENT IN LOCAL DEVELOPMENT PLANNING GUIDANCE (13/09/2023)

BEFS response welcomes this guidance on effective community engagement in local development planning, for communities and local authorities, and supports all moves towards clarity on how planning authorities can comply with their legal duties to engage with the public when preparing their local development plans. Questions around delivery – in particular around capacity of local planning authorities' duties regarding monitoring and reporting – remain.

LOCAL LIVING AND 20 MINUTE NEIGHBOURHOODS (20/07/2023)

BEFS considers that the benefits of local living and 20 minute neighbourhoods are well laid out with clear links to the Place Principle, Scotland's National Performance Framework and UN Sustainable Development Goals, to help deliver the policies as set out in National Planning Framework 4 (NPF4). The collaborative approach taken is to be encouraged but 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.

DRAFT NATIONAL PLANNING FRAMEWORK 4 (NPF4) CONSULTATION (31/03/2022)

In forming this response BEFS received detailed views from Members both in writing and through a roundtable discussion.

Whilst BEFS notes general support for the consultation and the development of NPF4 as a broad and open process, some concern is felt that oversimplification has resulted in omissions – notably the clear list of benefits that the historic environment delivers, somewhat to the detriment of the historic environment's representation as a national asset across planning and infrastructure.

BEFS Member responses can be found here: [RTPI Scotland](#), [Society of Antiquaries of Scotland](#), [SURF](#)

Historic Environment Scotland's response can be found [here](#).

BEFS acts as Secretariat to the [Conservation Officers Group](#) (COG). Their response can be found [here](#).

LOCAL DEVELOPMENT PLANNING – REGULATIONS AND GUIDANCE CONSULTATION (31/03/2022)

Ambitions for the Planning System

01/12/2023

In forming this response BEFS received detailed views from Members both in writing and through a roundtable discussion.

BEFS recognises the draft Local Development Plan Regulations and Guidance's clear aims at interconnectivity, clarity around policy landscape and a holistic approach. The guidance would benefit from greater consistency throughout, but the focus on re-use, infrastructure and read across to NPF4 and Scotland's National Performance Framework (lacking in NPF4) is welcome.

Page | 2

BEFS will be responding only to relevant questions of the consultation, as below:

1. What are the outcomes we need the planning system to deliver to have impact?

BEFS considers a key and impactful outcome of the planning system is a holistic understanding of what makes good places for people and communities. We support the RTPI's view that in order for holistic planning to work, reinforcing outcomes agreed and already consulted on is key and that 'the outcomes we need the planning system to deliver are already set out in existing legislation, policy, frameworks and guidance including:

- The Planning (Scotland) Act 2019
- National Performance Framework and associated national Outcomes
- The National Planning Framework 4
- The UN sustainable Development Goals

Further we would consider that good outcomes for people and places recognise the National Planning Framework 4 (NPF4) view that '*Scotland's rich heritage, culture and outstanding environment are national assets which support our economy, identity, health and wellbeing*' within decision making, whilst delivering against the spatial principles within NPF4, supported by the Historic Environment Policy for Scotland and the new strategy for the historic environment, Our Past, Our Future.

Another impactful outcome for the planning system would be better engagement from communities at an early stage in the process through access to information and guidance; to fully and meaningfully integrate Local Development Planning and Local Place Plans, recognising the role of communities in shaping their places as well as taking into account the issues of stretched resources within Local Authorities towards delivering the required consultation and engagement.

2. What makes a high performing planning authority?

BEFS would highlight the need for the appropriate skills and training within planning teams to enable appropriate consideration of the needs of communities and an understanding of the value and contribution of historic and existing buildings as assets towards outcomes set within NPF4 and Scotland's National Outcomes. Here BEFS would reiterate previous comments made by Historic Environment Scotland that '*Good management of the historic environment and its component parts (including designated and undesignated heritage assets) is central to the delivery of economic, social, environmental and wellbeing outcomes, especially through place-based planning and action*'.

Ambitions for the Planning System

01/12/2023

Alongside this BEFS would support the RTPI's view that *'for local planning authorities to achieve high levels of performance it is imperative that they have a proper resourcing strategy in place ...As well as budgetary considerations, the resourcing strategy should also consider the skills, tools, and knowledge currently available to make the best use of what local authorities already have at their disposal, and the potential for cross-departmental and cross-sectoral joint and collaborative working practices to be implemented'*

Page | 3

3. How can we measure this?

These outcomes should be measured beyond internal targets - with a holistic and outward looking view - and against National Outcomes. Here BEFS would agree with the RTPI that *'monitoring needs to take a whole-system approach that looks beyond simple numerical metrics of (for example) housing units delivered, towards the wider cumulative place-based and systemic outcomes of planning and the quality of these outcomes in delivering wider social, environmental, and economic benefits.'*

The collection and collation of data, working nationally and collaboratively, must be consistent across Scotland, as well as between local authorities, to provide a whole-nation picture to measure against.

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: Hazel Johnson, Policy and Strategy Manager

Email: hjohnson@befs.org.uk

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

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