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Community Empowerment Unit  
Scottish Government  
Area 3H South  
Victoria Quay  
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EH6 6QQ

26<sup>th</sup> September 2012

Dear Kate

### **Consultation on the proposed Community Empowerment and Renewal Bill**

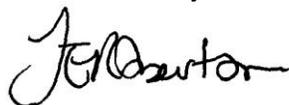
Built Environment Forum Scotland (BEFS) is an intermediary body for Scotland's built and historic environment sector. Through its member organisations, BEFS connects with over 325,000 individuals through 540 organisations. As you know, a number of representatives of BEFS members had opportunity to discuss the consultation with yourself at a meeting on 23<sup>rd</sup> August 2012. We are grateful to you for your presentation and answering our questions. I write to convey the key points that arose in the course of discussion:

- Overall the broad thrust of the themes being explored within the consultation is welcomed. However it is questioned whether a raft of new legislation is required or whether strategic objectives can be **achieved through policy and pre-existing powers, structures and activities**.
- Spatial planning (Q1): the meeting urged **stronger linkage with spatial planning** and community planning partnerships, cautioned against 'mission creep' and highlighted that spatial planning ought at least to be signposted at an early stage.
- Support to community groups (Q6-7): community based initiatives ought not to be seen as a free or cheap option. Genuine community engagement needs to be supported through appropriate **provision of expertise, training and support**. A key issue for local groups is sustainability over time and it is recognised that local authorities have limited resource to support community groups. In addition to definition or scope of the term community needs to be clarified – there being both communities of interest as well as place.
- Community right to buy and asset transfer (Q21-Q22): the meaning of 'unused' or 'underused' assets needs further clarification – there will be varying perspectives on what constitutes derelict or under-utilised. **A long term perspective** must be applied to land management.
- Common good (Q25-26): the meeting touched on confusion surrounding common good assets and the role of local authorities in looking after these and in administering common good funds. The situation relating to a common good asset can be complicated to tease out particularly when working with historic properties located in historic burghs. There is

considerable scope for **local inhabitants to be more aware of and involved with common good assets** in their locality.

I hope that these points are helpful. Please get in touch if you would like to explore these views further. We would be grateful if you would keep us informed of developments relating to this consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jo Robertson', written in a cursive style.

Jo Robertson  
Historic Environment Officer  
Built Environment Forum Scotland