

Response from Built Environment Forum Scotland

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.

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BEFS supports the Scottish Government's commitments to the UN-SDGs. However, (11.1) – there are still concerns:

- 50% of all of Scotland's homes have disrepair to critical elements ([SHCS](#) [Scottish House Condition Survey]2017)
- 68% of traditionally built homes (pre-1919) have disrepair to critical elements (SHCS 2017)
- Traditionally dwellings constructed before 1919, make up approximately 20% of Scotland's building stock (STBF 2016)
- In 2017, 40% of all dwellings failed to meet Scottish Housing Quality Standards (SHQS) (SHCS 2017)
- 30% of homes in Scotland failed the SHQS due to Energy Efficiency, while 10% failed due to not being Healthy, Safe and Secure properties (SHCS 2017)

Ways to address this include (but are not limited to) improving the ease and ability of repairing and maintaining our tenemental properties. Proposals for improvement in this area will be put before the Scottish parliament in 2019 by the [Scottish Parliamentary Working Group](#).

With regard to how older buildings are viewed as part of a sustainable resource to support the SDGs – how they are assessed for the EPC ratings needs to be reviewed to enable accurate assessment by appropriately skilled assessors for traditional buildings types. Often older buildings when correctly assessed, provide good standards (that can at times be improved upon) – rather than being viewed as merely old and inefficient. Their embodied energy must be taken into account, replacing an older building with a modern 'efficient' building has a high carbon cost – particularly when the entire building life-cycle is taken into account.

It is hoped that the Infrastructure Commission for Scotland's remit for inclusive growth and low carbon objectives can be far sighted enough to include our extant building stock, and it's repair and upgrading as a purposeful part of Scotland's infrastructure.

The changes that many buildings could undergo to form more sustainable assets, within more sustainable environments, is undoubtedly hampered by the current VAT rate on refurbishment and repair. 0% on new build and 20% on refurbishment and repair does not help the re-use and adaptation of buildings which could become well-placed homes, workplaces and service providers in often already connected places. Enabling VAT parity between repairs and new-build would undoubtedly make a difference in this area. Retrofit Scotland, and Architecture & Design Scotland have acknowledged this as a known barrier at a recent [event](#).

Ensuring a supply of affordable housing will also necessitate bringing more empty homes back into use – this is taking place in limited amounts due to resource implication, but more can be done. There are an estimated 79, 000 empty homes in Scotland (excluding 2nd homes) - Empty Homes Network.

Bringing many of these properties back into use may help the number of properties available across all tenures – at a time when we are told that 23,000 'new' homes need to be made available per year.

If we change the thinking on the concept of 'new' we can greatly increase sustainability whilst still providing necessary homes, and employment for those building/refurbishing and returning these properties to use. Increasing the number of homes, without increasing urban sprawl (11.3) can mean a better integrated urban

environment where people are closer to work, home, transport infrastructure, (11.2) and the necessary facilities.

Existing homes, whether empty or otherwise, may well already be connected to infrastructure. Appreciating, maintaining and enhancing these infrastructure connections. Enabling greater active-travel options, and enhanced public transport options will be key to improving sustainable places and communities.

The recent changes and suggestions for some of Scotland's urban areas in relation to LEZ introduction is a positive step – but radical changes are necessary to improve public transport infrastructure to make it a reliable, positive choice for many of Scotland's citizens.

11.4 Is the only UN-SDG that attempts to address the importance of the world's cultural and natural heritage. With an increasing recognition and understanding of the climate threat – and that imminent action is needed – our current natural and cultural heritage can help to play an ever increasing role in promoting and increasing sustainability. Its protection (both as cultural-heritage, and as a mitigatory presence) will be paramount to continuing to integrate people and place.

The Scottish Government have a strong community empowerment agenda which has brought in a variety of new rights and responsibilities. In relation to UN-SDG 11 one of the most central is Community Right to Buy. Funds have been made available to enable communities to buy, but it could be questioned whether the resources and skills necessary to run, maintain and sustain some of these endeavours has been as equally supported. Only time will tell if this has been an effective use of resources for the long term. Communities need to be genuinely empowered, not burdened by default.

Current amendments within the proposals for the Planning (Scotland) Bill go some way to enforcing the need for greenspace (11.7) within areas of development. There are also positive proposals for the formations of Local Place Plans enabling communities and local people to shape the development of their places – but resourcing and skilling for these proposals still needs to be fully articulated.

It is the Historic Environment Scotland (HES) policies and managing change documents which provide guidance and advice for how the historic built environment can be protected and adapted (11.4). These provide advice for progress with all sorts of building adaptations – but the line between protection and change can often appear as a barrier, rather than an enabler. Perhaps further messaging around this from HES will help to remove aspects of concern in relation to adaptation (from improved environmental efficiency, to adaptive-reuse).

What should Scotland do better to achieve this Goal?

Please write about what you think should be done to achieve this Goal. Be explicit about who you think should take the lead in making improvements – government, business, third sector?

Business will manage to operate within a given climate. Regulations will change, markets will fluctuate. It is the role of government to lead transformative change (seatbelt legislation, smoking regulation, cigarette sales) – sometimes to direct hard changes, for the greater good. It is the role of the Third Sector to push governments to raise and implement the standards, meeting the needs of the future, not just the now.

First Name: Ailsa

Last Name: Macfarlane

Email: amacfarlane@befs.org.uk

Organisation: Built Environment Forum Scotland

BEFS would be happy to discuss any responses further.