

Briefing in relation to Motion S5M-20261: Sustainable Development Goals in Scotland, On Target for 2030?

Tabled for: 16/January/2020

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

BEFS was a contributor to the [UWS-Oxfam](#) report to which this motion refers. BEFS paper relates specifically to UN:SDG 11 *Sustainable Cities and Communities*. BEFS supports the Scottish Government's commitments to the SDGs and wishes to highlight a number of areas relevant to these Goals.

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Empty Homes

As raised in recent Parliamentary debate: There are an estimated [39,000 empty homes in Scotland](#) (excluding 2nd homes). Ensuring a supply of affordable housing necessitates bringing far more empty homes back into use. Additional benefits of bringing empty homes back into use include, urban sprawl, as discussed in Goal 11.3, could be decreased and a better-integrated urban environment where people are closer to work, home, transport infrastructure (Goal Target 11.2) and the necessary facilities be created. BEFS supports, amongst other recommendations, the reform of Compulsory Sales Orders (CSO) as recommended by the Scottish Land Commission and the Local Government and Communities Committee; but would like to see an expedited timeline for reforms.

Maintenance

Currently, 50% of all of Scotland's homes have disrepair to critical elements ([Scottish House Condition Survey 2017](#)), 40% of all dwellings failed to meet Scottish Housing Quality Standards (SHQS), and 30% of homes in Scotland failed the SHQS due to lack of energy efficiency. Improving this contributes directly to the Goal in relation to improved sustainability for all our places.

Ways to address this include, but are not limited to, improving the ease and ability of repairing and maintaining Scotland's tenemental properties. Proposals for improvement in this area were put before the Scottish parliament in 2019, and by the [Scottish Parliamentary Working Group](#) – in December 2019 the Scottish Government issued a substantive and positive response for further work in this area. BEFS looks forward to positive developments.

Community Right to Buy

The Scottish Government have a strong community empowerment agenda which has brought in a variety of new rights and responsibilities. In relation to SDG 11, one of the most central elements of this agenda is the [Community Right to Buy](#). Funds have been made available to enable communities to buy land and certain assets, but it could be questioned whether the resources and skills necessary to run, maintain and sustain some of these endeavours have been as equally supported. Communities need to be genuinely empowered, not burdened by default.

Planning Act

The recent [Planning Act](#) goes some way to enforcing the need for greenspace within areas of development, as stipulated in Goal Target 11.7. 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.

Cultural Heritage Policy

Historic Environment Scotland's (HES) [policies and managing change documents](#) provide guidance and advice for how the historic built environment can be protected and adapted (SDG 11.4). These provide advice for

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progress with all kinds of building adaptations – but the line between protection and change can be perceived as a barrier, rather than an enabler. Further case studies and positive examples will aid in this area.

National Planning Framework (NPF4)

Consideration of formally including Historic Environment Policy for Scotland ([HEPS](#)) within NPF4 would put this on a statutory footing, more fully supporting how the historic built environment can be protected and adapted (SDG 11.4).

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VAT

The changes that many older buildings could undergo to form more sustainable assets, within more sustainable environments, is undoubtedly hampered by the current VAT rate on refurbishment and repair. The current 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. [Retrofit Scotland and Architecture & Design Scotland](#) have acknowledged this as a barrier.

EPCs

How older buildings are viewed as part of a sustainable resource to support the SDGs – specifically, 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 assessed as merely old and inefficient.

Circular Economy

The embodied energy present, and the potential for positive interventions is huge. Adapting, repurposing and reusing these buildings presents an enormous opportunity to provide carbon solutions, solutions which can provide benefits to economy, people and place. The recent consultation mentioned UN:SDG 12 – but BEFS wished UN:SDG 11 *Sustainable Cities and Communities* to also be considered within the concept of the circular economy.

The concepts of regeneration and restoration were rightly mentioned frequently within the recent consultation and can be partially fulfilled through our existing built environment. Without their inclusion, and due consideration being given to full-lifecycle considerations, we are failing to maximise the value of our places.

Whilst BEFS would promote maintenance, retention and reuse primarily there are also mechanisms which help to promote circularity of building materials. [Material Passport](#) schemes are being considered in various countries and the arguments for sustainability and circularity could suggest this is a path worthy of exploration – from suppliers, through procurement to building managers and those designing and building adaptations.

Example of National Policy

The Irish Government's recent publication of the discussion document, [Places for People](#) is clear that as a nation there is need to *demand sensitive reuse of our existing built environment resources*.

BEFS would also support the assertion within the document that:

Built heritage and climate mitigation and adaptation requirements should be mainstream parts of built environment decision-making.

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Legislative support

Recommendations made by the [Built Heritage Investment Group](#), and approved during the recent **Strategic Historic Environment Forum** (SHEF), Chaired by Fiona Hyslop, MSP – Cabinet Secretary for Culture, Tourism and External Affairs – include the following SDG relevant actions:

1) Changes to taxation structures for buildings:

The Scottish Government to consider using existing powers, or where appropriate to lobby for change in relation to:

Incentivisation for use and reuse of traditional buildings through income tax powers. A previous example being the HMRC, Business Premises Renovation Allowance (2007-2017).

Enabling, through conservation and continued use, the full potential of Scotland's built heritage asset by removing unequal application of taxation and VAT on restoration, maintenance and conservation works, whether through graduated relief or other fiscal incentives.

[...]

2) New Policies and Standards for Climate Change Adaptation and Mitigation for the built heritage including development of appropriate measures for carbon, embodied energy and energy efficiency emergency:

*The climate emergency demands careful stewardship of our precious resources. **The Scottish Government to consider introducing policy to incentivise a culture change, driving maintenance, retention, reuse and repurposing of existing heritage assets rather than the current default to ignore, replace or dispose of them.***

Recognise and develop a measure for the embodied energy in our existing built environment when considering development and repurposing options.

Recognise the unique challenges and limitations of the current assessment for energy efficiency improvements to traditionally constructed properties; energy efficiency is rarely assessed in ways which reflect the true benefits of these construction techniques. Review how built heritage assets are assessed and develop more appropriate assessment EPC tools for traditionally constructed properties.

BEFS would reiterate that not only valuing the embodied energy in our buildings, and assessing full-lifecycle considerations, but that considering policies to support a circular economy which incentivise a culture change: driving maintenance, retention, reuse and repurposing of our existing built environment – will be key to meeting Scotland's ambitions for a circular economy, climate targets, and social responsibilities.

The speed of progress is key to success. Whilst programmes for government take time to compile, the initial efforts (research, fiscal considerations, and evidence gathering) can commence. Changes to genuinely increase sustainability of our communities and places are necessary now.

BEFS has previously responded to a number of consultations in relation to the above topics and looks forward to working with Members of the Scottish Parliament in progressing the effectiveness of legislation relating to the built environment and the UN:SDGs.

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