

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 is issuing this statement of response due to the role the existing built environment can play in a sustainable 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.

This consultation starts by mentioning that, *In 2016, we launched 'Making Things Last', which laid the foundations for action and set out a bold vision for building a circular society in Scotland.* Our existing built environment is the foundation for action, and can play a pivotal part within the circular economy, BEFS was dismayed not to see reference to the built environment within the consultation.

The concepts of regeneration and restoration are rightly mentioned frequently within the 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.

The consultation mentions UN:SDG 12 – but BEFS would wish UN:SDG 11 *Sustainable Cities and Communities* to also be considered within the concept of the circular economy. Wider issues related to the built environment and sustainability and the UN:SDG 11 are discussed in a paper by BEFS within the [UWS-Oxfam](#) report.

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.

Amongst 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 – the following points are relevant to this consultation.

Recommendations included:

1) Changes to taxation structures for traditional 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.

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RESPONDENT INFORMATION

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

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**