

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.

Many policy areas have already been working towards aspects of the Build Back Better agenda over a number of years. Scotland's Government and Parliament have shown support for the Wellbeing Economy agenda, the UN Sustainable Development Goals, and are continuing to expand the implementation of essential active travel infrastructure.

This response focuses on the benefits the built environment can provide towards economic recovery. However, without support the sector will not be able to play its key part as:

- central to a potentially expanding skilled workforce, maintaining and appropriately adapting our environment for the long term economic and environmental benefits to people and place.
- a growing employment market – where repairing, reusing and adapting our built environment is central to economic recovery.
- an important link in the materials supply chain – supporting a wide range of related industries.
- a factor for putting more homes into use, as empty homes are brought back into use.
- a key resource, essential to Scotland's tourism offer (when the situation allows) – further energising local economies and securing future employment across a wide range of industries and employers.
- a focal point of regenerative strategies (particularly in relation to High Street decline, and Town Centre Regeneration) enabling a sense of place – whilst providing skilled employment, places designed to promote wellbeing, and adaptive buildings suited to new futures.

Our existing built and historic environment is an agent of economic recovery – but it is also central to our sense of place and our sense of nation. Our built and historic environment deserves to be protected, cared for and enhanced as it has sheltered us economically and socially before, we need to invest in its ability to do so for the future.

In the face of uncertainty – leadership is key to future focused ideas being able to become manifest. Leadership, in this instance, will involve cooperation, coordination, and collective action. Government, Public, Private and Third sectors in collaboration as active agents of change, pushing existing policy agendas *further* and *faster* than has been enabled previously.

BEFS has previously issued responses detailing 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 our current building stock presents an enormous opportunity to provide skilled employment, carbon solutions, and more homes. Solutions which provide benefits to economy, people and place.

The recent Circular Economy consultation started 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 this circular economy, a key part of Scotland's sustainable, economic recovery.

The Circular Economy consultation mentioned 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.

The mechanisms above can also be tied into a local economy agenda. North Ayrshire council have published a [Community Wealth Building strategy](#) (based on the [Preston Model](#)). BEFS would support further exploration and implementation of such models.

Recommendations previously made by the [Built Heritage Investment Group](#), and approved, during the last meeting of the **Strategic Historic Environment Forum** (SHEF), Chaired by Fiona Hyslop, MSP – Cabinet Secretary for Economy, Fair Work & Culture, 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 recovery, meeting established climate targets, and positively intersecting with societal responsibilities.

BEFS, as the Secretariat for the [Scottish Parliamentary Working Group on Tenement Maintenance](#), responded in detail to the **Infrastructure Commission for Scotland** call for Evidence & Contributions. One of the key findings of the Infrastructure Commission for Scotland was to recommend that the,

Scottish Government should require all public sector infrastructure asset owners to develop asset management strategies containing a presumption in favour of enhancing, re-purposing, or maintaining existing infrastructure over developing options for new infrastructure.

This step-change could be applied beyond publicly owned assets to meet the greenhouse gas emissions targets accepted by Scottish Government; from an economic perspective the skilled work provided through these measures would be positive for national and local economic recoveries.

Further rapid developments supporting the ongoing work and recommendations of the [Scottish Parliamentary Working Group on Tenement Maintenance](#) (which included suggestions for: mandatory Owners Associations, Building Reserve Funds and Building Surveys) would further enable skilled employment within the build heritage sector – and better maintained warmer homes – benefiting people and climate targets.

In BEFS response to [Housing to 2040 Consultation](#) it was noted that aspects such as ‘latency’ for the skilled workforce were mentioned, but there was a lack of expressed urgency as to how many of the constraints could be turned around within a 20 year timeframe. The current COVID19 emergency exacerbates the seriousness of reconsidering these timescales.

Fully considering the labour market *with* the education system –will be essential to producing skilled workers within the relevant sectors. Many of the issues mentioned are noted within the [Skills Investment Plan](#) for the Historic Environment , a framework with solutions exists within the document. Resource in this area could pay dividends across the retrofit, regenerative and maintenance agendas – supporting economic regeneration and providing grater long-term benefits.

More broadly, developments and changes supporting economic recovery and social justice across urban and rural environments, can be underpinned by community involvement and the already strong Scottish Government community empowerment agenda, which has brought in a variety of new rights and responsibilities.

Funds have previously 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.

Embracing opportunities for empowered decision making and engagement with and from communities and their environments will be central to successful, just, economically sustainable, transitions. Mechanisms for these processes can be enhanced through NPF4, and resourced Local Place Plans – ensuring that people are well represented and involved with decisions about their places, and what they value about their environment is cared for, enhanced and protected.

BEFS response is only one of a number of responses to the AGER which will be made by the built and historic environment sector. For these responses to be most effective we hope that the AGER will consider not only the individual details presented, but the *collective impact* that can be made by the sector, supporting a just transition to a greener and more sustainable economy, benefitting Scotland’s people and places.

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:
<https://www.befs.org.uk/resources/consultations/>

Further relevant thoughts in relation to the Scottish Housing Condition Survey can be found here:
<https://www.befs.org.uk/latest/scottish-house-condition-survey-tenement-maintenance/>

RESPONDENT INFORMATION

Name: Ailsa Macfarlane, Policy and Strategy Manager

Email: amacfarlane@bef.s.org.uk

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

Page | 4

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**