

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.

Our existing built environment is central to Scotland's places, and especially the distinctiveness of Scotland's towns. However, without support our built environment 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 a green recovery.
- an important link in the materials supply chain – supporting a wide range of related industries. (Country-wide retrofit policies could also reduce the costs of such interventions, making them more appealing to a wider range of property owners.)
- a factor for putting more existing 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 green recovery and regeneration – 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.

QUESTION 1. What are the challenges and opportunities facing town centres in Scotland and how should these be addressed?

Challenges include the reduction in retail, reduction in required office space, and the challenges brought by the current recession. The first two of which may hit cities hardest and towns may be able to capitalise on this change. Towns can provide hub activities and reduced commuting if: facilities, services and homes are attractive and affordable propositions. These services and hubs can harness our existing built environment to provide flexible, shovel-ready projects – reusing and reinvigorating our distinctive places.

QUESTION 2. What are the barriers to developing town centres suitable for their communities and how can these be removed?

Changes developed via the Local Place Plan process can be harnessed to remove barriers. These processes were developed legislatively via the Planning (Scotland) Act, these need to be appropriately resourced to genuinely reflect local views and needs; enabling informed regeneration and development which reflects local requirements.

QUESTION 5. If TCAP were to be revised, what additional or replacement areas and objectives would you recommend should be included and how should these be addressed?

A) Circular Economy:

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.

B) Localism Agenda:

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.

C) Taxation changes:

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.

[...]

D) Policies incentivising reuse/repurposing:

The recommendations previously made by the Built Heritage Investment Group, also included:

...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.

E) Maintenance and consideration of our existing environment as infrastructure:

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 a green recovery perspective the skilled work provided through these measures would also 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 built heritage sector – and better maintained, warmer homes – benefiting people and climate targets.

The key recommendations made by the Committee on Climate Change included prioritising actions according to six principles for a resilient recovery:

1. Use climate investments to support the economic recovery and jobs
2. Lead a shift towards positive long-term behaviours
3. Tackle the wider 'resilience deficit' on climate change
4. Embed fairness as a core principle

5. Ensure the recovery does not 'lock-in' greenhouse gas emissions or increased climate risk
6. Strengthen incentives to reduce emissions when considering fiscal changes

A programme of maintenance for our existing built environment, suitably adapting our built assets (across public and private ownership) supports all of the principles suggested. It supports skilled work and new jobs; it demonstrates an investment and mind-shift in using what we already have; it makes our places more resilient; all citizens could realise tangible benefits (whether in their home, workplace, public buildings, or as part of the employment and supply-chain); and the economic investment would be directly supporting reduced emissions (a wind and watertight home is far more energy efficient, even without retrofit adaptations).

Any investment in maintenance, specifically for pre-1919 dwellings, also directly addresses the Scottish Government National Performance Indicator for the historic environment, an indicator which has recently declined in performance.

Maintaining what we have is also a particularly Scottish issue, as highlighted in a 2020 BRE report: the UK has the largest proportion of pre 1946 housing stock in the EU, 37.8% compared with the EU average of 22.3%, and Scotland is markedly higher, with 52.9% of housing being built pre 1946. This helps to demonstrate the scale of the climate, and social, good that could be effected by policies maintaining and appropriately retrofitting these homes, and our public buildings.

F) Skills development:

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 a green recovery, fuelling economic regeneration, and providing greater long-term benefits.

QUESTION 7. Is there anything else you would like to add?

Our existing built environment is the best resource we have for making climate-positive, socially-just responses to economic and social changes. This is particularly apposite in towns across the country. These positive changes need both political will, and leadership implementing and resourcing policy and strategy.

RESPONDENT INFORMATION

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