

The Environment, Climate Change and Land Reform Committee

Green recovery

Submission From **BEFS (Built Environment Forum Scotland)**

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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.

This response focuses on the Committee questions :

What are the key barriers to delivering a green recovery (within your sector and / or community)?

Leadership investing in policy implementation in a decisive manner; and lack of local authority resource.

What key policies, actions and immediate priorities are needed to deliver a green recovery (within your sector and / or community)?

To be effective Government, Public, Private and Third sectors working 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**. Our existing buildings are the foundation for action and can play a pivotal part within this circular economy, a key part of Scotland's sustainable, economic recovery.

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.

Whilst BEFS would promote maintenance, retention and reuse of buildings 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.

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 welcome widening implementation of this model.

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 the following (truncated here for brevity):

- *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. [The Fraser of Allander Institute are undertaking research on what a Scottish VAT rebate could look like.]*
- *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.*

The Infrastructure Commission for Scotland recommended 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. The opportunity of retrofit post-COVID would create labour-intensive, localised job creation. Investment in cycle and walking infrastructure was found to have the highest employment multiplier of all transport investment post-COVID.

Infrastructure should be mindful to include the creation and maintenance of green infrastructure. Reinventing places (such as our town centres) as green, healthy and accessible spaces will be vital to ensuring their long-term sustainability. Re-inserting landscape back into the built environment can provide biodiversity and microclimatic benefits, improve health and wellbeing, increase community perception and mitigate flood management problems.

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.

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.

Embracing opportunities for empowered decision making and engagement with and from communities and their environments will be central to successful, green, 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.

The [key recommendations](#) made by the Committee on Climate Change included prioritising actions according to six principles for a resilient recovery. A programme of maintenance for our existing built environment, suitably adapting our built assets (across public and private ownership) supports all six of the principles. 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.

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 green recovery, promoting a circular economy recovery, meeting established climate targets, and positively intersecting with societal responsibilities.

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/>

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