

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 supportive of the Draft Infrastructure Investment Plan for Scotland, particularly the inclusion of existing homes within the definition of infrastructure; the support for *resilient and sustainable places*, and the acceptance of the recommendations previously made by the Infrastructure Commission for Scotland.

Many mentions are made to the ‘doubling [of] investment in maintenance over the next 5 years’. This investment could appear to be focused on transport infrastructure – all aspects which may well require maintenance - but which do not perhaps benefit the breadth of society in the way a programme of incentivised, nationwide, home maintenance would be able to. A programme which would support skilled, local jobs, improve spend in local economies, and support local supply chains. With outcomes benefitting public health, carbon savings, and the very real potential for personal reduction in outgoings; all in addition to improving homes across Scotland at a time when we are using them most. A programme defining and supporting a wellbeing economy.

Maintenance of this kind would also be essential to the best outcomes being sought by the Infrastructure Investment Hierarchy – a hierarchy which BEFS strongly supports. *Prioritising enhancing and maintaining our existing assets* is at the core of much work within the built environment and heritage. The work with public sector bodies to develop asset management plans is also strongly supported.

However, it is paramount that phrasing such as that on page 8 – “something new might only be built if there is still a demonstrable service need for a facility, and an existing asset can’t be repurposed” – remains true to its ideal. "Can't be repurposed" is very different from, is seen as - too awkward, time consuming, expensive, or fragile - to repurpose. This repurposing also needs to take into account the embodied energy within existing structures and factor that accordingly into carbon calculations. Consulting on carbon impact of future investment plans is mentioned. This could usefully include embodied carbon.

Work towards emissions reduction is also positive and noted, but needs to run alongside behaviour change education and incentivisation. Buildings also need to be well maintained and wind/water-tight to best assess what interventions will produce the best carbon savings.

Place : within a place based approach housing delivery is duly mentioned, in line with reusing our assets the 1000s of empty homes in each area could be taken into account. Enabling reuse of existing assets, often within connected places with amenities.

BEFS strongly supports the addition of **natural** to the definitions and descriptions of infrastructure.

BEFS queries the readiness of the pipeline through education into employment which will enable the take-up of the jobs intended to be supported through the capital investment programme.

The proposed amendments are consistent with the implementation of the Place Principle as adopted by Scottish Government.

BEFS strongly supports the response to this consultation provided by Historic Environment Scotland.

BEFS RESPONSE TO THE CONSULTATION QUESTIONS:

1a) YES

1b) YES

2a) YES

2b) Additional measures to ensure embodied energy and whole-life carbon costs need to be included.

Also, it needs to be clear that an existing asset can only be replaced/demolished when it CANNOT be repurposed, not when it is merely too fragile/difficult/time-consuming or seemingly expensive – to replace.

3a) A dashboard of indicators appears sensible. Especially if whole lifecycle costs, maintenance and associated jobs related to that; as well as the expected life of the asset are taken into account.

3b) An understanding of resources and skills available regionally should inform indicators; this could direct investment where needed locally preventing centralisation of services and populous; and further reducing travel demands and preventing unnecessary carbon emissions related to delivery of services. This localised approach would also further support the economic and social resilience of rural communities.

3c) BEFS on behalf of the OPiT Built Heritage Group, and as part of the Built Heritage Plan, has worked on the draft development of a Strategic Investment Toolkit which is relevant in this discussion:

<https://www.befs.org.uk/wp-content/uploads/2020/05/Draft-SIT-Complete-Pack.pdf>

We believe that this (as yet, untested) Tool, aligned to the four pillars of sustainability (economic, social, environmental, cultural) has the potential to make clear not only the significant economic, social and environmental roles our historic environment plays as part of infrastructure (ranging from World Heritage Sites such as the Forth Bridge, and Loch Katrine Water Works, to the canal network and the bridges of our transport system; as well as our public buildings and our existing homes) but to tangibly express the cultural value which lies at the heart of our historic environment assets.

BEFS also supports BEFS Member, RIAS – they have developed a methodology of “Quinquennial Reporting” of historic assets that provides monitoring of the condition existing buildings on a five year cycle. This is robust and well tested. It could be expanded and developed to provide a national digital database of built environment assets – possibly available through [ScotLIS](#). This will enable resource needs to be identified and interrogated at nation, regional and local levels. This also aligns with the Cross Party Tenement Maintenance Working Group’s [recommendations](#) that are being explored by the Scottish Government.

4a) YES

4b) Add in whole life costs and embodied carbon calculations

5a/b/c – no answer

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:

<https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

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

Draft Infrastructure Investment Plan Consultation

18th November 2020

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**

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