

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 is an extensive consultation and BEFS will only be responding to the questions stated below.

9. What are the most significant actions we can take to ensure that Scotland's people and organisations are meaningfully engaged in the net zero heat transition?

Scotland's home-owners, businesses, suppliers, and manufacturers need as clear an understanding as possible of who needs to do what, and by when. There needs to be an understanding of what heat systems will be recommended, what training needs to be in place, and what schemes will be available to help alleviate costs, or support training and further CPD. Consumer confidence needs to be built in the understanding of reliable systems, with the assurance that advice is accurate and impartial, and interventions will be well-suited to building type with skilled installation choices available.

All need to understand that a fabric first *incorporating* a maintenance first approach will pay dividends, and help to support the transition to net zero. But it is not possible without a robust skills supply chain to maintain all of Scotland's homes – from the traditionally built to the off-site modular, and everything in between.

22. What is your view on how best to engage, and support, local communities in the planning and implementation of the heat transition in their area?

Depending on the scale of transition, understanding and engagement could be built through the Local Place Plan system. An understanding of the planning system as well as the carbon benefits of keeping, adapting, as well as using new heat technologies within your local community – if advice and guidance is properly resourced, this could enable community transition through new heat technologies, whilst empowering and enabling communities to be active participants in their transitioning places.

This knowledge and approach could also benefit LHEES and Local Energy Action Plans.

27. What are your views on what Permitted Development Rights might help enable in the heat transition, in addition to those we have already included in the Permitted Development Rights review programme?

Whilst due attention is paid within the text to Listed Buildings, Conservation Areas and World Heritage Sites, with their associated protections; there is some concern in plans which would seek to *accelerate changes* on the scale which may be considered necessary to meet climate targets. Whilst so many questions remain, from assessment of traditional built buildings, to the types of interventions made – and considering the skills shortage as it stands – from the scarcity of conservation officers and skills within Local Authorities, to the lack of skills across all related trades and potential installations; BEFS would not want to see PDR expanded exponentially without substantially clearer guidance, not only on what appropriate interventions may be – but even perhaps with design guidance so these numerous interventions (air source heat pumps for example) were an asset to a building (and the environment), rather than a potential blight.

41. What are your views on the role of government funding over the next five years? For example, should it be focused towards significant increases in the volume of renewable heat and energy efficiency measures installed or more targeted at specific priority groups or technologies?

Whilst clear funding pathways are set out throughout this document the clarity of choice over heat-mechanisms and networks investment and skills training needs to be in place sooner rather than later, without this clarity there will not be skilled professionals across all skills bases, trades and scales to enable any of the programmes and associated options to go ahead. The CITB report https://www.citb.co.uk/documents/research/building_skills_net_zero_full_report.pdf makes clear the skills needs and timeframes.

48. What are your views on the regulatory actions set out in the proposed regulatory framework?

The framework spends significant time discussing the EPC and the failings in relation to net zero. The document does not take into account that the EPC as currently assessed also fail to correctly assess traditional built buildings in a number of ways (wall thickness being only one example). This failure of assessment means many buildings are starting from the wrong base line, and advice based on EPC assessment could involve costly, unnecessary and inappropriate interventions all in the name of energy efficiency; where the outcomes may then not realise the efficiency sought. This could be greatly damaging consumer confidence and understanding.

Work with HES is described as being about conservation areas and those sites designated or listed. Further co-working should involve using research about traditionally built properties and related energy efficiency interventions.

54. Is there anything further that can be done to ensure that Scotland realises the economic opportunity available from the heat transition?

57. In recognition of the proposals set out in the forthcoming skills consultation what further action can be taken to support skills development in Scotland over the lifetime of this strategy?

In answer to both questions 54 and 57. The economic opportunities can be further enhanced by instigating quicker training schemes. The focus also needs to be broader than new technologies. Without traditional skills many buildings cannot be wind/watertight, and without appropriate interventions the planned new technology cannot deliver as promised. These schemes need to empower SMEs.

Skills Investment Plans for [Construction](#), and for [Scotland's Historic Environment Sector](#) have already been invested in; they provide excellent points for expanding the skills sector across the built environment.

The document talks about what 'will' be done to boost the economy and support jobs. That 'will' needs to become an 'is' quickly enough to maintain, assess, and install appropriate interventions across all of Scotland's built environment.

60. To what extent do you agree that the issues identified must be addressed jointly by the UK and Scottish government s to unlock delivery in Scotland?

VAT is mentioned in relation to retrofit activity only. If VAT is to be addressed, then VAT parity between both new built activity and repair, maintenance and retrofit needs to exist. Without well maintained and repaired buildings the interventions in relation to energy efficient retro fit will not provide the outcomes sought.

64. Finally, is there any other information you would like to provide us with that is relevant to the development of Scotland's Heat in Building Strategy?

P9 states: *Multi-tenure or mixed-use buildings will be given until 2040-45 to improve both their energy efficiency and install a zero emissions heat supply, given the complexity involved in coordinating works and recovering costs between multiple owners, likely necessitating a 'whole building intervention' simultaneously covering energy efficiency and heat supply improvements.*

Page | 3

The Tenements (Scotland) Act 2004 requires the majority agreement of owners to proceed with property maintenance which includes insulation but may not cover the installation of zero emissions heat supply. This could be argued to be an 'improvement' that would currently require all owners to agree to proceed. The 2004 Act was amended by the Climate Change (Scotland) Act to include insulation as maintenance, and it may require further amendment so that any "alteration required to meet net zero emissions" can take place and costs recovered without requiring all owners to agree.

Expediting the [Tenement Condition Workplan](#) could greatly increase the ease with which works would be actioned, improving the living conditions of thousands of people within Scotland and greatly aiding the ambition to reach net zero.

BEFS would reiterate many points made in the [Energy Efficient Scotland Consultation](#) of 2018, particularly those around the importance of embodied energy and current EPC assessment.

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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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**

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**