

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 supporting member of the [Climate Heritage Network](#).

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

- [Draft National Planning Framework 4 \(NPF4\) Consultation](#)
- [Draft Heat in Buildings Strategy, Achieving Net Zero Emissions in Scotland's Buildings Consultation](#)
- [Housing to 2040](#)
- [Domestic Energy Performance Certificates \(EPC\) Reform Consultation](#)

BEFS Statement:

BEFS welcomes this call for views on proposals for a New Build Heat Standard (NBHS), to prohibit the use of direct emissions heating systems in new buildings and notes the importance of standardisation and regulation towards the need to tackle emissions associated with our built environment, and to achieving Scotland's climate change targets.

BEFS would highlight the need for the proposals to align, compliment and further enable those that are already in place for existing, traditionally constructed and historic buildings, incorporating a nuanced approach – in this case in particular, with regards to the reuse, adaptation and conversion of existing buildings. Here BEFS share the RIAS concerns that if new the standards require any existing heating systems to be replaced, should they not already be Zero Direct Emissions Heating (ZDEH), that this could seriously hinder the reuse of existing buildings.

BEFS would reiterate that the existing built environment is the most sustainable building resource we have, through the embodied energy present, and the potential for adaptation and reuse. Whilst appreciating that the focus of this consultation is new build, BEFS would advocate for a broader context, to ensure that the contribution of existing buildings towards achieving net zero are not (unintentionally) marginalised.

Part of this is to recognise that traditionally constructed buildings are not being accurately assessed (and therefore not receiving appropriate interventions) within the current EPC assessment process. BEFS has frequently lobbied for skilled, green employment in relation to this work, in line with the Scottish Government's Heat in Buildings Strategy. Assessed appropriately our existing built environment presents an enormous opportunity to provide climate solutions, as traditional properties form a fifth of Scotland's overall housing stock.

Further, as the consultation states, the proposed standard would 'help to prevent the need for retrofit (post-2024) as all buildings – eventually - transition away from DEH systems'. BEFS would suggest that here it is essential to consider the provision of skills for retrofitting Scotland's existing building stock, within this aspiration.

With regards to implementation of the proposals, BEFS welcomes the general principles, but considers that there is still some work to be done towards a broader culture shift within the construction industries, as well as Scotland's home-owners, businesses, suppliers, and manufacturers. 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.

BEFS responses to further 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**