

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](#).

BEFS response has been compiled incorporating Member interests and areas of expertise.

Question 6. Please indicate to what extent you agree that each of these statements should be a key message of the guidance.

1. Protecting human life is the primary aim of all fire safety measures.

Strongly agree

2. Fire safety measures support the long-term survival of historic buildings and help to keep them in use.

Strongly agree

3. Cultural significance is an important consideration when implementing changes for fire safety in a historic building. Adverse impacts on cultural significance should be minimised as much as possible.

Agree

4. Decisions on implementing fire safety measures should balance any adverse impacts against the benefits of the long-term protection of the building and its cultural significance.

Agree

5. Cultural significance is a key consideration when considering responses when a building has been damaged by fire.

Agree

6. Historic buildings can have additional fire risks – sometimes they are vulnerable to fire in ways that modern buildings are not.

Strongly agree

7. Changes to historic buildings must be carefully considered, and there may be specific permissions needed.

Agree

8. Historic buildings can be complex, and specialist technical advice is often necessary.

Strongly agree

Are there any key messages that we have missed out or should change?

Question 7. Do you agree with the scope and approach of the guidance?

Agree – broadly.

Please give any comments below.

BEFS would consider that the statements ‘*Protecting human life is the primary aim of all fire safety measures*’ and ‘*Historic buildings can be complex, and specialist technical advice is often necessary*’ are very much interlinked and are well placed as a central and overarching focus of the guidance in both prevention of, but also in responding to fires and the risk to human life involved.

BEFS recognises that Managing Change Guidance notes are used by decision makers for the historic environment and are a material consideration in the planning system - and are to be read alongside detailed technical guidance. Throughout the document we note and welcome signposting to relevant technical guidance and relevant policies. Clear signposting – and an understanding that further information can and likely should be sought is important; decision makers may have varying degrees of technical knowledge – where those decisions are concerned with safety issues, additional technical detail is increasingly likely to be required.

When considering risk at all stages of assessment, fire safety works and emergency plans for historic buildings, BEFS would highlight the need to ensure that the appropriate skills for historic buildings exist within construction practices, to fully recognise where the risks lie - this is something that BEFS has previously lobbied for with regards to interventions relating to Heat in Buildings and retrofit.

In this spirit, the below sections are welcome, but could be stronger on recognising the importance of specialist expertise and advice across the board:

- ‘*Assessments should be done by someone with the relevant knowledge, skills and expertise. The assessment may require changes to be made. **It helps to have an assessor** who has knowledge and experience of the specific issues that affect historic buildings.*’
- ‘*With older, more complex buildings, fire engineering **offers an alternative approach**. Fire engineers are accredited professionals who can undertake a full assessment of the building and develop a holistic, integrated approach to safety.*’
- *Emergency Plans - ‘For historic buildings **it can be helpful** for a plan to include information about particularly sensitive or important parts of the building. This can inform emergency response and help to identify priorities for firefighting. It’s also important for every home to have an escape plan so that everyone knows what to do if there’s a fire. This can save lives. You can read more about [escape plans](#) and [emergency fire action plans](#) on Fire Scotland’s website.’*

Question 8. To what extent do you agree with the following statements:

Managing Change – Fire and historic buildings

13/March/2023

The guidance identifies relevant policy considerations and how they apply to decision-making.

Agree

The guidance sets out a clear approach to making decisions on works for fire protection.

Agree

The guidance sets out a clear approach to making decisions on works when a building has been damaged by fire.

Agree

The guidance is clear on the need for consents and how to approach this.

Agree

Do you have any other comments on how the guidance interprets policy and the need for consents?

Not answered

Question 9. Having read the guidance, how confident are you that you understand:

Who to speak to if you need advice on fire safety works to a building.

Neutral

Where to get more detailed advice on fire and historic buildings.

Somewhat confident

How to find out if you need planning permission or other consents.

Very confident

Where to find national policy on the historic environment.

Very confident

Where to find other relevant guidance for decisions affecting the historic environment.

Very confident

Where to find more information on understanding cultural significance.

Somewhat confident

Question 10. We think that the section of the guidance called ‘Demolition’ is particularly relevant to climate mitigation and adaptation. Do you have any comments on how we have covered this?

BEFS consider the information in this section to be clearly laid out but would welcome a stronger articulation of the benefits of use and re-use of existing built environment and infrastructure assets, towards net zero and climate change outcomes – perhaps this could feature more usefully alongside Prioritising Significance, emphasizing the importance of retention and protection.

With reference to the section on Demolition: *‘Our historic buildings are part of our environment, and they reflect a wide range of our history and culture. They celebrate the diversity of our communities at every level, showing national, regional and local distinctiveness. They contribute to our wellbeing culturally, socially and economically.’* - this could be an opportunity to reinforce this and add that use and re-use of existing built environment and infrastructure, embodied energy, towards net zero.

Question 11. Are there any other areas of the guidance where we should highlight issues around climate response?

As above, BEFS considers that a stronger articulation of the benefits of use and re-use of existing built environment and infrastructure, towards net zero and climate change outcomes could feature alongside Prioritising Significance to amplify the importance of retention and protection.

Question 12. Do you have any comments on how the ‘Emergency plan’ section of the document we have covers accessibility?

Not answered

Question 13. Are there any other areas of the guidance where we should highlight issues around climate response or inclusion?

Not answered

Question 14. We tried to use language that is clear and accessible in this document. To what extent do you think we have achieved this?

Very well

What could we improve? Please add your suggestions here.

Question 15. Do you have any comments on the principle of supporting the guidance with case studies?

Not Answered.

Question 16. Please order these potential topics for case studies according to how important you think each would be. (1= Most important, 8 = least important)

8 - Writing and using a conservation plan

6 - Monitoring or enhanced detection for a building not in use

Managing Change – Fire and historic buildings

13/March/2023

- 1 - Fire Risk Assessment
- 3 - Emergency plans and increasing accessibility
- 2 - Escape routes – creating a new exit or stair
- 4 - Compartmentation using existing walls, ceilings or doors
- 5 - Identifying and installing an appropriate automatic suppression system
- 7 - Restoration or partial reinstatement of a building damaged by fire

Page | 5

Do you have any suggestions for examples which would make a good case study? Please give details here.

Question 17. If you have suggested a case study, please provide your email address so that we can contact you for further information.

Not answered

Question 18. Do you have any other comments or feedback on the draft guidance?

BEFS welcomes the section on fire risk assessments and the recognition that fire engineers have a vital role to play. As above it is an area where increased training may be required to deliver skills and develop expertise.

BEFS fully recognises that this guidance is essential and timely, it recognises Building Standards Division and the Safer Communities Directorate work in order that there is a co-ordinated approach to this vitally important issue, alongside allowing users to access and understand the need for related technical guidance.

BEFS recognises that the guidance does not go into detail about best practice in fire safety but aims to be a first reference point; it is intended to facilitate good decision making for the historic environment. Given the subject matter we would advocate for access to technical advice on this subject be essential for decision makers. We consider there to be good early links to NPF4 and how the guidance relates to HEPS, providing context within the planning system.

Question 19. This guidance note is part of a series, are there any other policies or issues that you think would benefit from similar guidance in the future?

BEFS notes the explanation and signposting at the start of the Guidance that *'This is not technical guidance about fire safety management. It identifies the relevant issues and provides links to expert sources of information on this. You can find additional guidance on this topic in our Inform Guide on Fire Safety in the Home and Guide for Practitioners on Fire Safety Management in Traditional Buildings'*, with clear links to further information. Alignment with the technical guidance is presumed, and where required a re-refresh to ensure that all information is up to date would strengthen this assertion; BEFS recognises that updating the Guidance for Practitioners does not sit within the scope of Managing Change Guidance, however given the importance of the subject matter it is worth noting.

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:
<https://www.befs.org.uk/resources/consultations/>

Managing Change – Fire and historic buildings

13/March/2023

RESPONDENT INFORMATION

Name: Hazel Johnson, Policy and Strategy Manager

Email: hjohnson@befs.org.uk

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

Address and Postcode: 61 Dublin Street, Edinburgh, EH3 6NL

Historic Environment Scotland would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

Are you content for Historic Environment Scotland 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**