

Draft Energy Strategy and Just Transition Plan

09 May 2023

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](#).

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

[NEW BUILD HEAT STANDARDS PT 2 \(20/10/2022\)](#)

[CIRCULAR ECONOMY ROUTE MAP & CIRCULAR ECONOMY BILL \(22/08/2022\)](#)

[DRAFT NATIONAL PLANNING FRAMEWORK 4 \(NPF4\) CONSULTATION \(31/03/22\)](#)

[THE REGULATION OF ENERGY EFFICIENCY IN EXISTING NON-DOMESTIC BUILDINGS: CALL FOR EVIDENCE \(25/02/2022\)](#)

[THE ROLE OF LOCAL GOVERNMENT AND ITS CROSS SECTORAL PARTNERS IN FINANCING AND DELIVERING A NET-ZERO SCOTLAND \(21/01/22\)](#)

[SCOTTISH BUILDING REGULATIONS: ENERGY STANDARDS AND ASSOCIATED TOPICS CONSULTATION \(24/11/2021\)](#)

[DOMESTIC ENERGY PERFORMANCE CERTIFICATES \(EPC\) REFORM: CONSULTATION \(6/10/2021\)](#)

[DRAFT HEAT IN BUILDINGS STRATEGY SKILLS REQUIREMENTS – CONSULTATION \(30/04/2021\)](#)

[DRAFT HEAT IN BUILDINGS STRATEGY, ACHIEVING NET ZERO EMISSIONS IN SCOTLAND'S BUILDINGS – CONSULTATION \(30/04/2021\)](#)

[GREEN RECOVERY – CALL FOR VIEWS \(07/08/2020\)](#)

[JUST TRANSITION COMMISSION – CALL FOR EVIDENCE \(30/06/2020\)](#)

[ENERGY EFFICIENT SCOTLAND: IMPROVING ENERGY EFFICIENCY IN OWNER OCCUPIED HOMES – CONSULTATION RESPONSE \(08/04/2020\)](#)

[HOUSING TO 2040 – CONSULTATION RESPONSE \(27/02/2020\)](#)

BEFS will be responding only to relevant questions of the consultation, as below:

2. What more can be done to deliver benefits from the transition to net zero for households and businesses across Scotland?

BEFS considers that the existing and historic built environment, whilst often recognised in part, lacks full integration across policy areas; existing buildings, including homes and infrastructure, present positive solutions across a variety of areas - they should not sit separately. Recognising this will deliver benefits from the transition to net zero for households and businesses.

6. Where do you see the greatest market and supply chain opportunities from the energy transition, both domestically and on an international scale, and how can the Scottish Government best support these?

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, a key part of Scotland's transition to net zero.

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.

7. What more can be done to support the development of sustainable, high quality and local job opportunities across the breadth of Scotland as part of the energy transition?

Fully considering the labour market *with* the education system will be essential to producing skilled workers within the relevant sectors. Within the [Skills Investment Plan](#) for the Historic Environment exists a framework with solutions; resource in this area could pay dividends across the retrofit, regenerative and maintenance agendas – supporting a green recovery, fuelling economic regeneration, towards net zero.

One specific example can be seen in the opportunity presented by the inaccuracies of the EPC in relation to traditional buildings: the existing built environment is the most sustainable building resource we have, through the embodied energy present, and the potential for adaptation and reuse. 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. BEFS has frequently lobbied for skilled, green employment in relation to this work, in line with the Scottish Government's Heat in Buildings Strategy and notes the potential for unintended consequences of recommended improvement measures, many of which occur due to traditionally constructed buildings not being accurately assessed (and therefore not receiving appropriate interventions) within the current EPC assessment process.

8. What further advice or support is required to help individuals of all ages and, in particular, individuals who are currently under-represented in the industry enter into or progress in green energy jobs?

BEFS 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 towards a fabric first – *incorporating* a maintenance first – approach to support the transition to net zero.

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: promoting a circular economy recovery, meeting net zero targets, and positively intersecting with societal responsibilities.

With the recent publication and imminent launch of a new strategy for this historic environment [‘Our Past, Our Future’](#), we see a positive advocacy tool towards behaviour change, and for the role of the historic environment within a wellbeing economy.

19. How can we identify and sustainably secure the materials required to build the necessary infrastructure to deliver the energy strategy?

BEFS would again advocate that the existing and historic built environment has a role to play within sustainable development, homes, jobs and infrastructure. However, BEFS also notes the importance of appropriate renovations and a nuanced approach to traditionally constructed buildings. We would also highlight that to deliver the above the relevant skills, appropriate materials and supply chains for materials must be in place; recognising a skills shortage, Skills Investment Plans for Construction and for Scotland’s Historic Environment Sector provide points for expanding the skills sector across the built environment.

We would reiterate that conversions and extensions to existing and traditionally constructed or historic buildings should also be assessed with the necessary expertise and any work following assessment should include identifying suitable materials and installation skills appropriate for works to and adaptation of traditionally constructed buildings. Consideration should be given to how traditionally constructed buildings function; building type and other measures of optimising heat generation and use may need to be considered to avoid traditionally constructed buildings becoming (avoidably) less comfortable to live in.

27. What further government action is needed to drive energy efficiency and zero emissions heat deployment across Scotland?

As we have raised in previous consultations, the existing and historic built environment, whilst often recognised in part, lacks full integration; existing buildings, infrastructure and planning are positive solutions across a variety of policy areas, they should not sit separately.

35. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the agricultural sector to decarbonise energy use?

The historic environment is a key part of Scotland’s landscapes. Farmers, crofters and land managers look after a significant amount of our archaeological heritage and built historic environment, such as drystone walls, hedgerows and historic rural buildings.

We know that existing buildings and infrastructure are positive solutions across a variety of policy areas, they should not sit separately. BEFS considers the importance of ensuring that the historic environment is integrated into the agri-environment process; a system which recognises the symbiotic nature of heritage

and landscape would reveal opportunities for funding for the effective management of heritage assets, conserving or enhancing them for a range of social, environmental, or economic benefits.

We consider that the historic environment is a positive asset towards meeting the Scottish Government's wider goals, including contributing to the twin challenges of biodiversity loss and climate change; integrated agri-environment schemes would unlock cross-cutting benefits. An example of what can be achieved is set by [Wales, in their recent agricultural bill](#).

40. What additional action could the Scottish Government or UK Government take to support security of supply in a net zero energy system?

- By 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
- Consider introducing policy to incentivise a culture change, driving maintenance, retention, reuse and repurposing of existing heritage assets .

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**