

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 existing 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:

EMPTY HOMES IN SCOTLAND – PARLIAMENTARY EVIDENCE (17/05/19)

HOUSING TO 2040 – CONSULTATION RESPONSE (27/02/2020)

BEFS statement:

BEFS welcomes this consultation on council tax rates on second and empty homes and broadly supports the suggestion that local authorities should be granted greater ability for discretion over increased rates and premiums. The reasons which lead to any home being empty are complex and manifold and BEFS recognises that this consultation acknowledges different contributing factors and scenarios within the discretionary proposals.

We would however note the possibility for unintended consequences in introducing additional powers, and consider that the efficacy of the intended discretionary nature of increases would depend on the capacity and resource of local authorities to fully - and holistically - consider *'local circumstances, including balancing the needs and concerns of their communities with wider economic and tourism interests'* as intended. Whether these powers can/will be enacted will also depend on the resource each local authority has to both carry them out, and to enforce the consequences.

BEFS has regularly lobbied for the continued use and re-use of existing buildings in addressing societal needs, as well as contributing positively to Scotland's climate and net zero agendas. As such we welcome the consultation's commitment, as part of Housing 2040 *'to provide councils with tools and powers to support them to make the best use of existing housing stock, including empty homes.'* Empty homes can be an adaptable resource and a source of embodied energy, capable of mitigating against negative impact on our climate. These benefits can however only be fully realised should the appropriate skills, resources, and policies, be in place.

Further - and crucially - we would consider that early and preventative work to stop buildings falling into disrepair, and a maintenance focussed, fabric first approach could help to reduce the numbers of empty homes, as at times there is a period of decline before a property is declared long-term empty. As such we would strongly consider that any additional income from increased taxation should be hypothecated to ensure that the appropriate incentives, knowledge, understanding, and training exists to carry out appropriate repair and adaptation of Scotland's existing building stock towards re-use.

BEFS also welcomes that the *'potential impact on local economies and the tourism industry'* is listed as a factor to be considered for premiums on second homes, in recognition of the important role many second homes and historic houses have both within local communities, as well as nationally. BEFS appreciates that in areas of housing scarcity and high tourism, those competing needs will have to be carefully balanced by local authorities to ensure the most sustainable outcomes.

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**