

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:

- [CIRCULAR ECONOMY \(SCOTLAND\) BILL – CALL FOR VIEWS \(01/09/2023\)](#)
- [CIRCULAR ECONOMY ROUTE MAP & CIRCULAR ECONOMY BILL \(22/08/2022\)](#)

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

1. To what extent do you agree with the priority actions proposed within the Reduce and Reuse strategic aim?

- Agree

BEFS is supportive of the proposed actions within the route map towards a circular economy and is pleased to see inclusion of construction within Objective 3. BEFS has previously noted the importance of appropriate reuse of materials to repair and maintain Scotland's existing and historic building stock, as part of a fabric first approach. We consider regional hubs and networks supporting reuse of construction materials and assets as a potentially positive step towards ensuring that local – and suitable – materials can be recycled where possible. Whilst BEFS would promote maintenance, retention, and reuse of buildings primarily, there are also mechanisms which help to promote circularity of building materials. Material Passport schemes are being considered in various countries. Further detail on how these hubs would be supported and facilitated would be welcome.

BEFS has previously highlighted the role that the existing built and historic environment can and should play in a sustainable circular economy and would reiterate the importance of its explicit inclusion, as a key part of a route towards a circular economy. The embodied energy present and the potential for positive interventions is huge. Furthermore, adapting, repurposing, and reusing our current building stock presents an enormous opportunity to provide skilled employment, carbon solutions, and more homes.

2. To what extent do you agree with the further actions to 2030 listed across the Reduce and Reuse strategic aim?

- Agree

BEFS is pleased to see included the action to 'Investigate and promote options to incentivise and build capacity for the refurbishment of buildings'. As such, comments on incentivisation provided in response to the consultation, Delivering Scotland's circular economy: A Route Map to 2025 and beyond, are worth reiterating:

'BEFS is pleased to see the measure to incentivise 'refurbishment' and would go further, advocating for incentivising a culture change, driving maintenance, retention, reuse and repurposing of existing heritage assets rather than the current default to ignore, replace or dispose of them. We would further add that maintaining what we have is also a particularly Scottish issue, as highlighted in a 2020 BRE report: the UK has

the largest proportion of pre 1946 housing stock in the EU, 37.8% compared with the EU average of 22.3%, and Scotland is markedly higher, with 52.9% of housing being built pre-1946. Traditional properties form a fifth of Scotland's overall housing stock. This helps to demonstrate the scale of the climate, and social good that could be effected by policies embedding maintenance and appropriate retrofit of these homes, and our public buildings, as part of circular construction practices.

Incentives:

- Incentivisation for use and reuse of traditional buildings through income tax powers. A previous example being the HMRC, Business Premises Renovation Allowance (2007-2017).
- 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.'

There is also the need to align these measures with existing policies and strategies, in particular the NPF4; we consider it essential that there are clear delivery mechanisms for construction, within the existing policy landscape and strategies, to fully embed these ambitions.

BEFS would consider the importance of full integration and recognition of the role of local planning authorities and the built environment towards achieving targets in relation to a circular economy. BEFS considers statutory targets to be helpful in meaningfully bringing about behavioural change but would caution that unless fully supported, local planning authorities may struggle to deliver against them.

3. To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

- Not answered

4. To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

- Not answered

5. To what extent do you agree with the priority actions proposed within the Decarbonise Disposal strategic aim? Please provide evidence to support your answer if possible.

- Agree

BEFS would here reiterate the presumption towards prevention and highlight the opportunity that re-use of existing buildings presents in the reduction of waste generation, for the construction industry.

6. To what extent do you agree with the further actions to 2030 listed across the Decarbonise Disposal strategic aim? Please provide evidence to support your answer if possible.

- Agree

BEFS broadly agrees with the further action proposed but would emphasize the need for a culture change - driving maintenance, retention, reuse and repurposing of existing heritage assets rather than the current

default to ignore, replace or dispose of them – and supports RICS view in response to the Circular Economy (Scotland) Bill – Call for views in September 2023 that “...*given the scale of the challenge – with construction and demolition accounting for half of all waste produced in Scotland – we believe a construction-specific circular economy and sustainability strategy is required.*”

7. To what extent do you agree with the priority actions proposed within the Strengthen the Circular Economy strategic aim? Please provide evidence to support your answer if possible.

- Agree

BEFS is broadly supportive of the aim to regularly review and refresh strategic targets towards a circular economy, to enable a fulsome, holistic and future looking strategic approach. We would however express concern that this could prove resource intensive, to the detriment of action toward delivery. Further, regular review must align with existing and nascent cross cutting legislation - within the existing policy landscape - in order to fully embed these ambitions.

8. To what extent do you agree with the further actions to 2030 listed across the Strengthen the Circular Economy strategic aim? Please provide evidence to support your answer if possible.

- Agree

In particular BEFS would welcome the proposed further action to continue to develop and ‘Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities’ and ‘Support greater uptake of green skills, training and development opportunities’.

As noted in previous consultation responses, fully considering the labour market with the education system will be essential to producing skilled workers within the relevant sectors to fully utilise existing resources and infrastructure, and minimise waste generation. 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, fueling 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.

As part of a Circular Economy and Waste Route Map, and to deliver the above, the relevant green skills, appropriate materials and supply chains for materials must be in place.

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**