

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:

DRAFT HEAT IN BUILDINGS STRATEGY SKILLS REQUIREMENTS – CONSULTATION (30/04/2021)

CONSULTATION ON DEVOLVING POWERS FOR A SCOTTISH BUILDING SAFETY LEVY (19/02/24)

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

5. Are there any other exemptions from the Scottish Building Safety Levy that you think should be considered by the Scottish Government?

BEFS considers that any levy should not apply to retrofit and/or refurbishment, or social housing.

We would also note that should small scale current developers be faced with additional financial burdens, that this could impede positive adaptation and re-use of existing buildings. In relation to retrofit BEFS cautions against any financial measures that could disincentivise appropriate climate adaptations (BEFS here reiterates the importance of investing in not only **retrofit**, but also maintenance and repair of Scotland's historic and existing building stock alongside maintenance of retrofitted buildings).

7. Do you have any comments on exemptions not covered by this consultation that you wish to raise?

Clarity on how the proposed levy relates to the Cladding Remediation Bill would be welcome.

BEFS would also note here that traditionally constructed buildings and modern constructed properties differ in how they function; in recognition of this a nuanced approach should be incorporated into proposals and exemptions.

12. Do you think there should be a different rate applied on brownfield developments?

Yes.

NPF4 sets out a policy intent to encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development.

28. Are you aware of any examples of how the proposals in this consultation might impact, positively or negatively, on island communities in a way that is different from the impact on mainland areas?

BEFS would refer to the Islands Communities Impacts Assessments:

<https://www.gov.scot/publications/island-proofing-work-introducing-island-communities-impact-assessments-icia/>.

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

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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**