BEFS CONSULTATION RESPONSE: DRAFT CLIMATE CHANGE PLAN

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.

This is a response from BEFS to selected questions in the Scottish Government's 2025/26 consultation on its Draft Climate Change Plan, which sets out policy actions for addressing and adapting to the effects of climate change in the 2026-40 period.

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

- Climate Change Plan Scrutiny (Sep 2025)
- Heat and Energy Efficiency Technical Suitability Assessment (Aug 2025)
- Minimum Energy Efficiency Standards in the Private Rented Sector (Aug 2025)
- Environmental Standards Scotland Draft Strategy 2026-2031 (Aug 2025)
- Strategic Guidance on Climate Change Duties for Public Bodies (May 2025)
- Delivering Net Zero for Scotland's Buildings – Heat in Buildings Bill (March 2024)

1. What are your views on our approach to delivering a just transition for people and communities?

BEFS is in general agreement with: the vision for a just transition set out in the main body of the draft strategy; the just transition principles described in Annex 1; and recognition, in Annex 2, that transformational change is needed in our approach to residential and public buildings, to make significant progress in addressing climate change.

With regard to BEFS sphere of interest, the highlighting of multiple strategies that directly relate to improving the built environment, and the considerations of how these strategies can complement each other in a route map for the next 15 years, is also helpful.

We have, however, several concerns about the current draft of the Climate Change Plan. The approach is, overall, light on the detail of practical delivery. The cross-

policy objectives of the approach could also be strengthened and clarified. In addition, the Buildings Annex's main focus on decarbonising heat in buildings is felt to be too narrow.

BEFS has spent much of 2025 consulting with our Members and stakeholders in producing a Manifesto for the Built Environment ahead of the 2026 elections to the Scottish Parliament. A central theme is a call for going further and faster in responding to the climate emergency and achieving Net Zero and a just transition as part of a whole systems approach across policy portfolios.

BEFS Members in varied built environment specialisms across the country report that progress in retrofit, reuse and other thematic priorities is patchy and slow. Transformational change requires a scaling up of investment and action across a wide range of areas including training and skills, tenement repair and maintenance, retrofit project delivery, heritage project grant programmes, bringing vacant buildings back into use, data and research, and more.

The vision, principles and transformational built environment change identified in the Climate Change Plan needs a wider, whole systems policy approach. This requires further consideration and explanation around delivery and implementation, particularly with regard to the buildings and places that are at risk of being left behind by limited availability of funding and investment programmes, and by additional pressures on household finances in more fragile economic regions.

The approach does not directly address a number of open questions around macro and micro implementation. This is a nationwide, long-term vision requiring action across public, private and voluntary sectors and households. Will it translate effectively to the granular level and, for example, eliminate fuel poverty for residents of a specific building in Ayr or Arbroath?

Built environment specialists in the BEFS network, including architects, have reported on the difficulties they have faced retrofitting their own homes. If building experts highly knowledgeable of trades, processes, opportunities, and appropriate technologies are struggling to navigate the practicalities of energy efficiency improvements, how can we better support typical households?

BEFS Members are also concerned about the capacity limitations in local government that is almost certain to restrict their potential to support the delivery of additional actions over the Climate Change Plan period. Could the approach successfully meet its objectives if local government capacity stays the same, or is reduced further, over the next 14 years?

As clarified in the Manifesto, BEFS position is that making dedicated investment in preventative spend across relevant policy areas – including repair, maintenance and retrofit, and training and skills – is required now to set the groundwork for meeting Climate Change Plan targets over the 2026-20 term.

2. We recognise that workers face particular impacts from the Plan and we have outlined our approach to supporting the transition of the workforce, including skills for jobs. What skills, training and qualification provisions will be

most important in a net zero future and what more could be done to support them?

Improving the energy efficiency of Scotland's buildings, and making appropriate climate adaptations, requires skilled workers. Scotland's proportion of pre-1946 housing stock, at 52%, is the highest in the world, and in 2023, 45% of dwellings had some disrepair to critical elements. This is an urgent and distinctive problem in Scotland, but accessing traditional building skills and training courses across the trades is a widely recognised problem with maintaining our historic and traditionally constructed buildings across urban, rural and island Scotland.

Typical difficulties include specialist contractors being booked up months in advance, being unable or unwilling to quote for certain works requiring historical expertise, or declining to travel to some parts of the country. The good practice standard of finding three competitive quotes can be impossible in situations where sourcing one is hard enough.

This creates delivery issues on the ground for funding, timescales and reporting obligations, sometimes challenging building repair and retrofit project viability altogether. Traditional building skills are vital for the maintenance, repair, and refurbishment of much of our urban environment. As skilled practitioners – across masonry, joinery, thatching, glass, ironwork and more – are becoming harder to find, our buildings will continue to deteriorate.

The latest Historic Environment Scotland Stonemasonry Survey Report, which reported that the nation had around 360 skilled stonemasons in 2023, highlighted concerns about a general lack of support for the field, including in the realms of training provision, the fittingness of current skills to industry needs, and the ability to meet future demand. With the skilled worker base at risk, so are the buildings that depend on them, and with them their climate change value and potential.

Traditional construction training is not a niche, 'nice to have' specialism, but an essential service required for the health of all buildings and preventative maintenance. The Climate Change Plan would benefit from supportive actions to prevent Colleges and training providers from reducing or stopping the provision of these courses, and to continue supporting and scaling up the hub and spoke model of national skills centres. A recent example of this effective model can see seen at Lock 16 in Falkirk, but more is needed.

In a fast-changing world with a busy policy landscape, evolving Net Zero approaches, and emerging technologies and techniques, it is vital that those in the traditional skills industry need to have access to continual opportunities and incentives to learn, develop, and share their knowledge with the next generation. As things stand, not enough do. Training infrastructure and support is needed for a new generation of skilled workers. Traditional skills must be mainstreamed.

Many historic and existing built environment specialisms, such as heritage management, construction, conservation, digital and retrofit coordination, have their own skills capacity issues, with gaps in the training required to maintain the built environment. In their 2025 skills analysis survey, Scottish Engineering reported that by the end of 2027, the industry needs 58% new engineers across 31

specialisms. They described the growing skills gap situation as "facing an economic disaster".

In the context of their remits, resources, local knowledge, representation and influence, the Climate Change Plan is right to seek to involve another section of the workforce – local authorities - closely in delivery. The Plan calls for enhanced collaboration with industry, community led partnerships, and the wider public sector, and in taking effective action with regard to their own housing stock.

As increased action requires leadership and resources, BEFS chief concern is that this may not be available across all local authority regions and departments. BEFS network exchanges, including in the planning authority working group that BEFS facilitates (Conservation Officers Group), highlights the pressures local authorities are under at present to meet rising statutory demands with scarce resources.

Research from BEFS Members Royal Town Planning Institute (RTPI) Scotland demonstrate a considerable loss of built environment sector capacity in local government. RTPI Scotland highlight a 28.6% reduction in planning spend from 2010-2023, while demands on local government planning services have risen across this period. RTPI Scotland's 2025 State of the Profession survey found that 65.8% of public sector respondents reported lacking capacity frequently or all the time.

This general situation – reduction in capacity coupled with a growth of duties – is common in many areas of local government in Scotland. Without an increase in capacity, local governments will find it very difficult to devote the necessary resources to supporting the transformational change necessary to deliver the Climate Change Plan.

5. How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?

BEFS supports decisive legislation and action to improve the energy efficiency of Scotland's homes, and the cross policy direction of travel of the Heat in Buildings (Scotland) Bill. BEFS, however, views improved fabric and condition of existing properties as a crucial starting point for the Bill. A stronger focus on improving the fabric of homes so they are more able to transition to clean heat is needed.

Without ensuring buildings are wind and watertight and well-maintained, any interventions may be detrimental to the building and to occupant health, and may not result in the energy reductions expected despite good intentions.

Within the Heat in Buildings (Scotland) Bill and linked legislation, it will be important that maintenance, repair and fabric first approaches receive appropriate attention. Secondary legislation will be necessary at many points along the journey. Access and clarity around the appropriate options, responsibilities, and stakeholders is essential to avoid unintended consequences.

To be achieved, the Heat in Buildings (Scotland) Bill and wider targets for Net Zero requires a shift in approach and mindset. The new Energy Performance Certificate regulations, consultations on Minimum Energy Efficiency Standards and the Heat

and Energy Efficiency Technical Suitability Assessment can be effective proposed pathways.

Nonetheless, it remains crucial that there is alignment of approach across the policy landscape. To pick up on our responses to questions one and two of this consultation, this will involve investing in the right skills across disciplines, but not in isolation, ensuring consumers have access to the right options – and know what they are.

A policy of maintenance and repair, incorporating a fabric-first approach, will pay dividends, and help to support the transition to Net Zero. Flexibility and consideration towards different building typologies and contexts is also important; a strict, one-size fits all approach to Minimum Energy Efficiency Standards could be damaging. A robust skills supply chain to maintain all of Scotland's homes – from the traditionally built to the off-site modular, and everything in between – is vital.

BEFS, the Chartered Institute of Building and 12 leading built environment sector partners have called on Scottish Government to establish a Ministerial Oversight Group and a Retrofit Delivery Plan to address concerns of insufficient progress on retrofitting buildings to improve energy efficiency. The report highlighted the urgent need for stepping up action on retrofit to meet fuel poverty, building maintenance and Net Zero commitments and targets.

While being realistic on the cross-policy complexity of retrofit and the varied effectiveness and costs of new technologies and processes, the report identifies a need for improved joined-up policy-making to overcome barriers and capitalise on opportunities to make serious progress.

To break down policy silos, the group behind the report, known as the Retrofit Roundtable, call on the Scottish Government to create a Ministerial Oversight Group on Retrofit. This Oversight Group will have the authority and remit to work across the full range of relevant policy directorates, Ministers and Cabinet Secretaries, to develop the resources and programmes to meet the retrofit challenge in the short and longer term.

The Retrofit Roundtable also wish to see the Oversight Group devise and implement a Retrofit Delivery Plan, to provide: clarity of funding across public sector portfolios and external funders; retrofit solutions tailored to the needs of particular building types long-term targets driven by evidence; measurement tools to track progress; and consideration on meeting the challenge on workforce capacity and skills, and the quality of retrofit works.

A Retrofit Delivery Plan could set a robust framework for appropriate and effective solutions. It is not difficult to find examples of inappropriate or poor quality retrofit works, which may lead to severe problems such as poor air quality, damp and mould emerging years after installation, and which may also have negative implications for building deterioration.

BEFS also works with the Existing Homes Alliance, a coalition of housing, environmental, fuel poverty, consumer and industry organisations that share a mission to improve existing homes. The Alliance is calling on the next Scottish

Government to maintain and build on Home Energy Scotland and help develop locally-based retrofit service hubs to support people with in-depth planning and coordination of home upgrades.

Retrofitting older buildings for energy efficiency is a relatively modest investment for major gains to alleviate a wide range of issues, just some of which are carbon emissions, fuel poverty, health and wellbeing, and improved preservation of key community, tourism and architectural assets.

Growth of the retrofitting industry will simultaneously create skilled jobs and training opportunities, to the benefit of local economies across Scotland's urban settlements, rural regions and islands. This will help ensure no group or place is left behind as policies and projects are rolled out, in strong alignment with a key objective of the Climate Change Plan.

8. How can the Scottish Government support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?

BEFS Members are generally supportive of the Scottish Government's various place-making efforts and initiatives that are undertaken to ensure a geographic community's physical assets and amenities are maintained and developed in line with local needs and aspirations, and which are respectful of the distinctive characteristics of each area.

For BEFS, effective place-based approaches are holistic, collaborative, and considerate of a place's function and identity. They provide positive outcomes for health and wellbeing, sustainable economic development, and long-term resilience against climate change and other threats. Taking better care of our Scotland's built assets and 'everyday heritage' alongside heritage visitor attractions, and doing more to celebrate them and promote engagement with local people and visitors, is an important place-making action point.

Improving the appeal and offer of town centres, providing greater access to green spaces, waterfronts, designed and no designated landscapes and other public spaces, and enhancing urban connectivity are also imperative. The cross-portfolio value of bringing empty buildings and vacant land back into productive use in our villages, towns and cities is considerable and often underappreciated.

The Vacant and Derelict Land Task Force, a collaboration of 30 cross-sector bodies led by the Scottish Land Commission and the Scottish Environment Protection Agency, investigated the key contemporary challenges inhibiting progress, especially in smaller sites, and produced a recommendations report to the Scottish Government in 2020.

As the Task Force noted, there is 11,000 hectares of vacant and derelict land and buildings in urban Scotland – almost twice the size of Dundee (the Dundee City Council boundary contains 6,300 hectares). The challenge of repairing and bringing historic buildings back into productive use is considerable given the scale, but reducing this total will create major added value for our people, places, economies and environments. A wider application of the Task Force's

recommendations, utilising learning outcomes from their research and pilot testing, is needed to deliver this.

Reuse over a default towards new-build must be a firm commitment. Alongside this, a wealth of added value can be unlocked addressing the Climate Emergency, anti-pollution and biodiversity targets, avoiding unnecessary waste, and developing more green spaces, designed landscapes and attractive waterfronts. This supports community empowerment, proactive planning, walkable neighbourhoods and active travel, and provides myriad additional benefits for local economies, tourism, community development, pride of place, health and wellbeing, skills and employment, town centre improvement, and much more.

Place-based approaches are growing in influence in national policy, as evidenced by a series of policy initiatives including the Place Principle, Local Place Plans, 20 Minute Neighbourhoods and Local Living, Community Wealth Building, the Town Centre Action Plan, community led regeneration, and the Place-Based Investment Framework. To maximise cross-policy value and impact, place-based policy and practice should be fully integrated and referenced within the Climate Change Plan.

10. Are there any additional proposals to support waste sector emission reduction that should be considered across the following 5 areas: strengthen the circular economy; reduce and reuse: modernise recycling; decarbonise disposal; other emission sources (including waste water and anaerobic digestion)?

BEFS Members have a particular focus on two key outcomes here: better maintenance, retention, and reuse of our existing buildings; and mechanisms that promote circularity of building materials.

In reiterating some messages from other consultation questions, one concern BEFS has with regard to retrofitting buildings for energy efficiency, is overlooking or downplaying existing conditions. The BEFS Manifesto argues that regular maintenance, repair and wider focus on improving the fabric of homes, so they are more able to transition to clean heat, is needed as a first step.

This can be enhanced and quickened by skills training investments, and extending hub and spoke regional skills centre models to ensure training and development opportunities are available to businesses throughout Scotland.

BEFS Members are also particularly keen to see the Scottish Government investigate the international experience with Material Passport schemes, and consider adopting a suitable model in Scotland.

Transition to local production of materials where possible, including built environment materials such as slate, sandstone and timber, will further help local economies in Scotland to decarbonise.

BEFS Members readily acknowledge that a wider culture shift is needed across society to embed circularity. A meaningful transition to a circular economy requires a holistic strategy and cross-portfolio working from the public sector, in

addition to supportive action from other economic actors including businesses, charities, community groups, and households.

They also argue that the support infrastructure, systems and learning pathways need to be in place for people to engage with them effectively. This involves appropriate funding and practical action to support local circular economies in alignment with a just transition for climate change and Community Wealth Building principles.

BEFS is in active dialogue with Zero Waste Scotland and shares enthusiasm for their development of a Scottish Circular Construction Hub. The Hub is likely to provide a wealth of learning outcomes and practical support for reuse, recycling, decarbonisation and circularity in the entire built environment sector across Scotland. It may also be possible to accrue transferable learning from the other Hubs planned in Europe.

13. How can the Scottish Government encourage sustainable land use, that is also productive for local communities?

BEFS Members, including professional bodies, national charities, funding agencies, community groups, heritage trusts and public bodies, have pointed to community consultation processes across Scotland that often feature at or near the top of wish-lists a desire to bring empty town centre buildings back into use.

These buildings often have historical significance, rich cultural value for communities, and major economic regeneration potential for places. Long-term vacancy creates a direct problem in putting town centre buildings at risk of further deterioration and eventual demolition. If unchecked, this leads many buildings of historical significance, from town halls and churches to libraries and industrial heritage, inaccessible and in a state of neglect.

Closure, dereliction, and demolition of significant local buildings is often in direct contrast to community wishes and to national policy aspirations as set out in the Climate Change Plan, the Fourth National Planning Framework, the Place Principle, the Community Wealth Building (Scotland) Bill, and many more.

One responsive action that could help to encourage further change is highlighted in Scotland's Historic Environment Audit 2024, which notes the existence of key data gaps with respect to sustainable use of land and buildings. While we have some data through the currently paused Buildings At Risk Register, much more needs to be invested to fill the gaps in understanding on the condition and use of significant buildings, especially with regards to undesignated historic assets. The data landscape is scattered, making it difficult for public bodies and communities to understand the state of affairs for condition and use of land and buildings.

BEFS has long advocated for up-to-date, holistic, and regularly maintained data for all of Scotland's places. The benefits of comprehensive data and research collected, gathered, hosted, and presented by the Scottish Government would be manifold. Examples include data on community woodlands and settlements, vacant and derelict land, community owned land, archaeological assets (discovered as

well as areas of interest for undiscovered assets), industrial and post-industrial sites.

If this data was mapped effectively across the rural and urban realms and viewed across time, changes in land use could be reviewed against national indicators for economic health, wellbeing. This would be highly beneficial for strategic planning and monitoring of land and asset management nationally.

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

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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

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