

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 \(01/09/2023\)](#)

[Scotland's draft Circular Economy and Waste Route Map to 2030 \(15/03/2024\)](#)

[Strategic Guidance on Climate Change Duties for Public Bodies \(23/05/2025\)](#)

BEFS will be responding with a statement, as below:

BEFS is pleased to see that the development of a circular economy is a key priority through the priority entitled "resources". BEFS has consistently supported the benefits of a circular economy in Scotland, highlighting that the construction sector is responsible for more than half of Scotland's waste, through demolitions primarily, and advocating for a circular construction economy. Re-using existing buildings and infrastructure is a key way to reduce negative environmental impact through waste and demolitions, and BEFS would like to see this type of preventative spend being a part of recommendations for preventing environmental degeneration. In terms of the circular economy priority, it would be helpful to see greater clarity on both the scope and inherent gaps in the reach of the Strategy. The existing built environment needs a policy landscape that is joined up and effective in delivering wellbeing and future-proofing for Scotland's people and places – ensuring clarity on where gaps need to be filled would address this need. It would also be helpful to see included in the Strategy an explicit map for where the Strategy can and will have due regard of other relevant strategies and policies, such as the Biodiversity Strategy and the NPF4.

BEFS are disappointed to see that the priority "population, human health, and cultural heritage" has been removed from this iteration of the ESS Strategy without any clear indication of how this priority may have been integrated elsewhere. Cultural heritage, and the historic and existing built environment, can and should play a key part in moving towards a circular economy, with benefits to climate change, Net Zero, and wellbeing. BEFS has previously noted that timely investment in these areas will leverage future benefits. It would be beneficial for the sake of advancing these aspirations if ESS would join the sector in a united voice to highlight the need for a holistic approach to policy understanding and change, and therefore this should be reflected in the ESS Strategy.

Recognising the statutory powers that the ESS have to enforce action, BEFS would like to see clarity and specificity about the interconnected holistic policy landscape in, for example, the improvement reports and how these relate to requirements to comply with environmental law. Connecting duties to have due regard to our existing built heritage as a crucial medium towards wellbeing, the economy, and national Net Zero targets to name a few, to the enforcement of good environmental standards is crucial. To nationally realise circular economy principles, each institution with statutory powers must take all reasonable steps to mainstream these principles.

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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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**