

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:

- [Climate Change Plan Scrutiny](#) (2025)
- [Environmental Standards Scotland Draft Strategy 2026-31](#) (2025)
- [Industrial Transition for Scotland](#) (2025)
- [Climate Change Targets Bill](#) (2024)
- [Scotland's Draft Circular Economy and Waste Route Map to 2030](#) (2024)

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

Question 1: Do you agree with the vision of the Environment Strategy?

Yes. The long-term aspirations set out in the Environment Strategy align strongly with those advocated for by BEFS and its Members.

Shared priorities for BEFS and the Environment Strategy include reducing carbon emissions, climate-proofing our buildings and places, providing warm, comfortable homes, reusing vacant heritage assets, developing circular local economies, improving green and blue infrastructure in our towns, cities, and villages, enhancing culture and heritage access, and investing in skills, training and supply chains.

BEFS is in full agreement that delivering a just transition in climate change requires holistic, long-term, and cross-portfolio actions across the many themes and sectors highlighted in the Strategy.

The vision's 20-year timeframe is logical in marrying the necessity of a longer-term approach that spans multiple Parliamentary cycles, with a tangible delivery period built from short- and medium-term activity. It is admirable in considering the many local, regional, and national opportunities that can be taken in Scotland to respond to a pressing global crisis.

Question 2: Are there any outcomes that you feel should be removed, added or changed in the Environment Strategy?

BEFS is clear that a just transition will not be possible without taking concerted, interconnected action in the five core themes of primary importance to our Member organisations: climate emergency and net zero; repair, maintenance and retrofit; culture and heritage; training and skills; and planning and place-making.

Built environment and heritage aspects are implicit in some of the Environment Strategy outcomes, including reducing the contribution to climate change, building national resilience to climate impacts, improving heating systems in housing, and achieving a just transition. There is, however, no specific mention of the built environment in the top-level outcomes. This is a missed opportunity.

Correcting this could play a useful role in demonstrating and deepening understanding of the significance of built environment dynamics to the Environment Strategy. BEFS has previously noted that the role and potential of the built environment is underplayed in many key public policy spheres, including climate change, health and wellbeing, and economic performance. This comes with a great opportunity cost that hinders plans to maximise value and potential from Scotland's built environment assets.

Question 4: The pathways for the outcomes on biodiversity, climate change and pollution signpost to existing policies – how can we best address potential synergies and trade-offs across these outcomes? For example, how can we reduce greenhouse gas emissions in a way that also helps to restore biodiversity and minimise pollution?

One area with massive unrealised potential, which avoids any trade-offs while progressing all three pathways, is to productively reuse our vacant and derelict land. The Community Wealth Building Bill is just one of several policy and legislative initiatives that seeks more action on this. Section 5.(5)(e) of the draft Bill, specifies the following as one of eight example measures that could add value to Community Wealth Building action plans: “bringing vacant and derelict land back into use in a way that provides financial, social or environmental benefit to the community.”

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 towards reusing vacant and derelict land and buildings. It produced a recommendations report to the Scottish Government in 2020, which highlighted 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 cross-portfolio value of bringing empty buildings and vacant land back into productive use in our villages, towns and cities is considerable given this scale, and is often underappreciated. Reuse over a default towards new build creates a wealth of added value for climate change, anti-pollution and biodiversity targets, avoiding unnecessary waste, and developing more green spaces, designed landscapes and attractive waterfronts. There are also myriad additional benefits for local economies, tourism, community development, pride of place, health and wellbeing, skills and employment, town centre improvement, and much more.

Despite a supportive policy environment, BEFS Members are concerned that not enough investment is being made to bring vacant and derelict land and buildings back into use at scale. A number of barriers must be overcome. Just some of these include a lack of access to traditional skills such as ironwork, stonemasonry and glasswork and appropriate or indigenous materials, the high cost of some retrofit technologies required to make empty buildings warm and comfortable, planning system delays and complications that can inhibit refurbishment works, restricted project funding, inflationary pressures on supply chains, the performance gap in energy efficiency works, and not enough research and evidence into the long-term effectiveness of repair and retrofit activity.

A similar opportunity is available in the realm of living well locally and 20-minute neighbourhoods, which calls for amenities such as shops, public services, and public transport links to be available within easy walking distance of people’s homes. Two of the many positive outcomes for the Environment Strategy here are reducing transport emissions and strengthening sustainable local economies. Again, there is a supportive policy environment for this aspiration, including in the Fourth National Planning Framework (NPF4) and the Place Principle, but limited investment in project-based activity means progress has been slow and patchy.

The Environment Strategy could usefully strengthen outcomes pathways towards reusing vacant land and buildings, and delivering more sustainable 20-minute neighbourhoods in the short and longer term, to maximise value and progress, as well as avoiding thematic trade-offs with regard to these outcomes pathways.

Question 7: To what extent do you agree/disagree that societal changes, including in our lifestyles and behaviours, are needed to help tackle the nature, climate and pollution crises?

Responsibility for responding effectively to the climate emergency does not sit solely with the public sector. Businesses, charities, consumers, and households all have a vital role to play in moving away from 'business as usual' to sustainable models of living that meet current societal needs without compromising the ability of future generations to meet their own needs.

Page | 3

The Scottish Government and its agencies, through strategies, public campaigns and by acting as role models, can positively influence behaviour change across sectors and at all levels of society. As referenced elsewhere in this response, reusing vacant buildings and developing 20-minute neighbourhoods, is one example of a shift towards healthier, more active lifestyles that reduce carbon emissions that can be derived from actions in the built environment sector.

As the draft strategy notes, public sector led interventions to develop circular economies and more energy efficient homes, will enable and complement more sustainable individual lifestyles. A virtuous circle, in which all areas of society are supporting and developing positive change, is required to make serious headway towards 2045 ambitions.

Question 9: To what extent do you agree/disagree that a just transition to a net zero, nature positive, circular economy is needed to support Scotland's role in tackling the nature, climate and pollution crises?

BEFS Members and stakeholders consider a just transition in climate change as a public policy necessity.

Transitioning fairly and efficiently into a low-carbon, circular economy is a must if the nation is to effectively support the wellbeing of current and future generations, and the sustainable development of our diverse communities and local economies. As the consultation paper highlights, a successful transition is not a public cost to be dealt with, but a generator of new economic opportunities across urban, rural and island Scotland.

Focusing on the built environment, delivering a just transition requires home-owners, businesses, suppliers, and manufacturers to possess a clear understanding of who needs to do what, and by when. There are open questions on what heat systems will be recommended, what training needs to be in place, and what schemes will be available to help alleviate costs, and support skills training. Consumer confidence needs to be raised in the understanding of reliable systems, with the assurance that advice is accurate and impartial, and interventions will be well-suited to building type with skilled installation choices available.

In the context of historic town centre streets and existing infrastructure, there needs to be local procurement of materials and appropriate supply chains in place. Fully valuing the embodied energy in our existing buildings and infrastructure, and assessing full-carbon lifecycle considerations, will complement national and local policies driving maintenance, retention, reuse, and repurposing of our existing built environment.

Material passport schemes, culture change towards reuse, fiscal incentivisation, appropriate tax relief, and implementing best practice standards across multiple sectors, can all help drive improvements. Traditional materials, locally sourced, are more sustainable. Local planning authorities need to be fully supported to deliver against any statutory targets set for a circular economy. The pilot version of the UK Net Zero Carbon Building Standard, which calls on developers to consider end-of-life uses of materials used in new constructions, can also provide an operational template for future development.

A strategy that includes these actions will greatly enhance local construction, maintenance and retrofit businesses, supply chains and skills pipelines across Scotland. In its forthcoming 2026 Manifesto, due for publication in mid-October, BEFS will call for the next Scottish Government to implement a set of practical recommendations that we believe will help build a better Scotland by improving quality of life, communities, and the environment across the country. The thrust of the Manifesto aligns well with the Draft Environment Strategy, and BEFS agrees the Scottish Government and its agencies should act now to set foundations for the decades to come.

Question 12: Do you agree/disagree with the approach set out in the pathway for the outcome “These transformations are achieved through a just transition and support climate and environmental justice”?

The linked section of the Strategy has a strong focus on the natural environment, air pollution and international moral obligations. It could be strengthened with regard to the built environment, the economy, housing and skills.

To reiterate the theme of our response, actions and investments around the built environment is an essential part of the solution, improving lives and supporting vulnerable people by protecting our buildings and places from climate-related harm, providing comfortable housing, improving the quality of public spaces, community hubs and public sector amenities, and providing wider fair work opportunities by investing in skills, training, and supply chains.

A just transition is a fair and inclusive process that takes into account the diversity of Scotland’s people and places, and delivers positive impacts nationwide. Recognising the existing built and historic environment, and Scotland’s rich heritage, will strengthen these cross-policy efforts to build a better Scotland.

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

Name: Derek Rankine, Head of Policy and Strategy

Email: derekr@befs.org.uk

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

Address and Postcode: 61 Dublin Street, Edinburgh, EH3 6NL

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**