

# BEFS STATEMENT ON DRAFT 2026-40 CLIMATE CHANGE PLAN FOR THE LOCAL GOVERNMENT, HOUSING & PLANNING COMMITTEE

## IN SUMMARY

Built Environment Forum Scotland welcomes the focus on buildings in the 2026-40 Climate Change Plan, but calls for wider, whole systems action across public policy. This includes in the spheres of training and skills, tenement repair and maintenance, retrofit project delivery, heritage project grant programmes, bringing vacant buildings back into use, and data and research. BEFS also calls for the Scottish Government to consider challenges in local government capacity, and to focus on the value of a fabric-first approach to retrofit intervention, as the Plan is developed and implemented.

## Introduction

[Built Environment Forum Scotland](#) (BEFS) is a charity and umbrella body that informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment. Our Members represent the entire sector, from surveying to architecture, archaeology to landscape, and individual buildings to city centre townscapes.

BEFS is grateful for the opportunity to give evidence to the Local Government, Housing and Planning Committee in response to its call for views on the Scottish Government's Draft Climate Change Plan for 2026-40, and specifically the Sectoral Annex for Buildings and the delivery implications for local government.

## Sectoral Annex: Buildings (Residential and Public)

BEFS welcomes the recognition of the need for "transformational change" to make significant progress in addressing climate change in Annex 2 on Buildings. The acknowledgement of the particular challenge of retrofitting historic buildings, in terms of the expertise needed and the scale of nearly 20% of Scottish homes being built pre-1919, is also helpful.

The Annex rightly highlights and draws connective tissue between multiple relevant strategies, including on fuel poverty, heat decarbonisation, Energy Performance Certificate reform, grant support, advice provision, and the supply of green jobs. This, and the illustrated routemap to 2040, is a helpful overview of the evolving policy landscape around climate change and the built environment.

The Annex's central and repeated focus on decarbonising heat in buildings is, however, too narrow from BEFS perspective. BEFS Members, consulted on a recently launched [2026 BEFS Manifesto for the Built Environment](#), have called for wider, cross-portfolio public policy action on Net Zero and the climate emergency for buildings and places. The next section outlines some of these calls.

Two key open questions on transformational change not fully engaged with in the Annex content are:

1. 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 Paisley or Peterhead?
2. 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?

## Cross-Policy Alignment and a Whole Systems Approach

BEFS argues that a major scaling up of investment and action across public policy areas that relate to the built environment is necessary to address the anticipated impacts of climate change in Scotland.

BEFS has identified the policy areas in need of attention as part of a holistic, whole systems approach as including – but not limited to – training and skills, tenement repair and maintenance, retrofit project delivery, heritage project grant programmes, bringing vacant buildings back into use, and data and research. The [2026 BEFS Manifesto](#) highlights specific policy recommendations to build the foundations for resilience to the climate emergency while enhancing buildings and places, and improving quality of life.

To illustrate the need for just some of these actions, the [2024 Skills Investment Plan for the Historic Environment](#) identifies industrial heritage as a key problem area, which needs a framework for specialist technical and material skills. BEFS, the Chartered Institute of Building and 12 leading sector partners have called on Scottish Government to [establish a Ministerial Oversight Group and a Retrofit Delivery Plan](#) to address concerns of slow and patchy progress on retrofitting buildings to improve energy efficiency.

BEFS Members consistently articulate that the sector does not have the data and research it needs to fully understand the current needs and conditions of our diverse building typologies, and the effectiveness of emerging retrofit technologies. As the BEFS Manifesto also articulates, national heritage grant programmes are oversubscribed and declining in real terms, during a period in which costs are rising and increased repair, maintenance and retrofit project activity is vital for transformational change.

## Implications for Local Government

BEFS notes the Committee's interest in exploring the planned involvement of local government in implementation. In the context of their remits, resources, local knowledge, representation and influence, BEFS welcomes the Climate Change Plan's reference to involving local authorities closely in delivery, including through enhanced collaboration with industry, community led partnerships, and the wider public sector, and in taking effective action with regard to their own housing stock.

Increased action, of course, 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 and the Association of Local Government Archaeological Officers (ALGAO) 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 ALGAO Scotland statistics evidence a decrease of 38% archaeological officers, from 32 to 20 full-time equivalent staff, between 2005-2025. Demands on local government planning and archaeological services have risen across this period.

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.

## Heat in Buildings (Scotland) Bill

A final comment from BEFS is to support decisive legislation and action to improve the energy efficiency of Scotland's homes, and the 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.

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*Derek Rankine, Head of Policy and Strategy, Built Environment Forum Scotland | 14 November 2025.*