LOCAL GOVERNMENT, HOUSING & PLANNING COMMITTEE
SCOTLAND'S CLIMATE CHANGE PLAN: 2026-2040 –18TH NOVEMBER 2025

Introduction

The Royal Incorporation of Architects in Scotland (RIAS) welcomes the opportunity to provide evidence on the draft climate change plan.

The RIAS is the professional body for Scotland's chartered architects, representing over 4,800 members working across the public, private, and academic sectors. Our members contribute to the design and delivery of sustainable places including participating in design certification schemes which promote high energy efficiency buildings.

The RIAS has formally acknowledged the climate emergency and supports the measures that the Scottish Government and other stakeholders are taking to reduce $CO_{2(e)}$ emissions and those adverse climate changes which are increasingly evident.

The Challenge

To meet Scotland's commitment to a 2045 net zero target, we need to address both our domestic and non-domestic properties. These account for around 20% and 7% of our emissions respectively.

Scotland has 262k non-domestic buildings[1] and 2.72m homes[2]. The average annual rate of demolition of housing over the last 8 (non-covid) years, and for which statistics are available, is 1,301[3]. At this rate by 2045, just 1% of the existing housing stock will have been replaced. Meanwhile, at the current rate of house building an extra 355k[4] new homes will have been added, roughly 2 per hour.

In the last two centuries we have moved from a position where the biggest challenge was simply to find something reasonably nearby to burn to keep warm. To now meeting the technical challenge of heating, lighting and cooling buildings, without a harmful impact on the wider biosphere.

Technically this challenge can be met. Current regulations require all new buildings to have either net zero direct emissions (NZDE) heating systems, or in a minority of cases, biomass systems. Equally, the skills in Scotland applied in conserving, reinterpreting, repairing and decarbonising older buildings are second to none, and are applicable to many more mainstream buildings.

The move towards net-zero will, however, require further and profound changes in how the sector operates.

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1 https://www.saa.gov.uk/general-statistics/?REPORT_NAME=vr_subject_total#report_list

2 Table 2: https://www.nrscotland.gov.uk/publications/households-and-dwellings-in-scotland-2023/#:~:text=In%202023%20the%20number%20of%20households%20in%20Scotland%20was%20estimated,annual%20growth%20rate%20since%202008.

3 https://www.gov.scot/publications/housing-statistics-conversions-and-demolitions/

4 https://www.gov.scot/publications/housing-statistics-for-scotland-new-house-building/

Committee members may recall our previous evidence regarding the difficulties recruiting, training, and retaining enough skilled workers to deliver the infrastructure and built environment needed for a thriving, sustainable future. It is not just a numbers problem, but also a skills problem. Whilst organisations such as Skills Development Scotland have started to address these, the overall outputs are currently modest. Headline figures set out, for example, in the Chancellor's Spring Statement do not in our view reflect the situation "on the ground".

That in turn has implications for how quickly the pace of change can occur. If the market is left to provide without sufficient support, there will inevitably be delays and cost increases. With a co-ordinated, government-led cross-sector approach we can do so but employers, developers, industry stakeholders, and public sector partners all need to increase their efforts.

Solutions

The question then, is what more can national and local government do to create the financial and regulatory environment which accelerates the improvement and decarbonisation of the existing built environment?

Investment: The Scottish construction industry can only respond effectively if the investment needed in training and capacity building leads to a financially sustainable industry over the coming decades. A short-term approach is unlikely to bear fruit in a sector where 3 to 4 years of training is required.

Skills and Training: Support and encourage the higher and further education sectors to increase training, particularly with regard to construction quality and the application of a "fabric first" approach, together with the application of appropriate decarbonised heating solutions.

Building Regulations: We must continue to improve performance standards for new domestic and non-domestic buildings. In contrast to other parts of the Scottish regulatory framework such as fire safety, the thermal and environmental requirements of the Building Regulations have lagged behind other European countries.

Planning: Traditional tenement housing is remarkably efficient in creating cohesive walkable neighbourhoods. If well insulated, the "form factor" of tenements are intrinsically energy efficient. Planning policy and its implementation should favour such solutions, including "place mending" as well as "place making" over dispersed suburban development.

Vacant Housing: Put in place measures to tackle the 92,536[5] vacant homes in Scotland. For example, by supporting community wealth building, through the opportunity to buyout underused or vacant properties, bringing them into new ownership models and back in to use.

Co-ownership: Mixed tenures militate against large scale area improvements. Tenement Management Scheme (TMS) should be more widely promoted.

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[5] Table 4: https://www.nrscotland.gov.uk/publications/households-and-dwellings-in-scotland-2023/#:~:text=In%202023%20the%20number%20of%20households%20in%20Scotland%20was%20estimated,annual%20growth%20rate%20since%202008

Heat Networks: Decarbonised heat networks offer the potential to decarbonise entire neighbourhoods but require a regulatory context which promotes their introduction.

Materials: Much of the current emphasis is on operational energy use, however energy is also expended on manufacturing of materials and the construction of buildings themselves. We need to encourage wider use of low-carbon, environmentally friendly materials and products. Given the right support, these materials can be manufactured at scale in Scotland and would support the steps needed to achieve a Net Zero Building Standard[6].

Funding: Put in place those carrots and stick measures that require those building owners who can afford to improve their building performance to do so, and support those who cannot through grants and subsidies, perhaps underpinned by a charge on the properties themselves.

Assessment: Mandate the requirement for building level assessments every 5 years or so, by those skilled and able to offer independent advice on fabric improvements and appropriate technologies.

National Database: Ensure building level assessments are used to create a national database of building attributes, such as floor area and their condition. This, by extension, would support building stock management and identifies the opportunities for improvement.

Conclusions

The registered social landlord (RSL) sector demonstrates that it is possible to manage and improve building stock, in line with a regulated requirement from government. The energy performance and building condition of RSL housing stock, both new and legacy, generally outperforms much that is privately owned. We need to consider how these successes can be extended to private sector domestic and, importantly, non-domestic properties.

An important part of that can be achieved through improved building regulations however we must also focus on retrofit. The most sustainable building is generally the one you already have. The continued use of a building is a prime example of a circular economy.

As the Climate Change Plan acknowledges the improvements needed to Scotland's built environment represents a significant economic opportunity. The majority of construction spend goes on labour costs. This is particularly true when applied to existing buildings, where the skills required tend to be greater and the material requirements much lower.

In the view of the RIAS, these changes must happen. The only limiting factors are political will and industry capacity. Now is the time for us to invest and build for a sustainable future.

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6 Scottish Enterprise: Delivering a place-based, net zero embodied carbon strategy for Scotland.