Your Views

1. What is your assessment of the progress to date in cutting emissions within the sector/sectors of interest and the implementation of the proposals and policies set out in previous Climate Change Plans (RPP1-3)?

Please provide your response in the box provided.

2. Do you think the scale of reductions proposed within the sector(s) are appropriate and are the proposals and policies within the CCPu effective for meeting the annual emissions targets and contributing towards the 75% reduction in GHG emissions by 2030 and net-zero by 2045 targets?

Please provide your response in the text box provided.

3. Do you think the timescales over which the proposals and policies are expected to take effect are appropriate?

Please enter your response in the text box provided.

4. To what extent do you think the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits (e.g. environmental, financial and health) from specific interventions in particular sectors?

Please enter your response in the text box provided.

We note the outcome and policies and proposals relating to Peatland Restoration. HES has ongoing involvement with Peatland Action to explore how that historic environment considerations can be appropriately and effectively incorporated into restoration projects and schemes. In support of this, we believe the proposed
development of a Peatland Restoration Standard will play an important role in helping to ensure best practice and continuous development in the success and effectiveness of peatland restoration.

We welcome the inclusion of Outcome 4 (Establishment of pilot Regional Land Use Partnerships to help ensure that we maximise the potential of Scotland’s land to help achieve net zero. Publication of Scotland’s third Land Use Strategy.) and consider that HES, as the lead body for the historic environment, has a valuable role to play in delivering this outcome.

5 To what extent do you think the CCPu delivers a green recovery?

Please enter your response in the text box provided:

Evaluation

1 Was this views submission tool easy to use?

Not Answered

Why did you feel it was, or was not, easy to use?:

2 Do you think this Call for Views submission tool provides a good way for you to get involved in the work of Parliament?

Not Answered

Please explain the reasons for your answer?:

We agree that buildings are key area of influence in achieving the Climate Change targets that have been set out by the CCPu. With pre-1919 buildings making up 19% of Scotland’s building stock, we believe that the historic environment, as a pre-existing and publicly valued resource, can make a significant contribution to the Green Transition.

We support the recommendations of the Infrastructure Commission who have concluded that most of the infrastructure that will be used in 30 years already exists today. They also found that the proper maintenance of existing assets will ensure that they perform more effectively during their lifetime – and that rebuilding is not always the best option. The Infrastructure Commission for Scotland Report (January 2020) recommended prioritising investment in the utilisation,
maintenance and enhancement of our already existing assets, which is also the most sustainable way to achieve net-zero carbon. We are pleased this recommendation is being taken forward in the emerging Infrastructure Investment Plan and would highlight the important role the Climate Change Plan can play in adopting the same approach.

In this context, we support policies and actions which the reuse and refurbishment of existing building stock. We note the EU Commission is likely to recommend that existing building renovation is key to a green recovery from the Covid-19 crisis. The use and reuse of historic and traditional buildings, whether they are tenements or warehouses, has huge potential to contribute to reducing GHG from the construction industry. It also reduces waste and extraction of new building materials. The 2019 report from the UK Committee on Climate Change has identified retrofitting existing homes as one of five priorities for government action. An Oxford University Study (published May 2020) on international approaches to a net-zero emissions Green COVID-19 recovery (includes learning from the 2008 financial crisis) found that green projects create more jobs, deliver higher short-term returns per pound spend and lead to increased long-term cost savings, by comparison with traditional fiscal stimulus.

We have already co-sponsored a request with the Construction COVID Forum, of Construction Scotland Innovation Centre to come up with a multiplier for Repair & Maintenance (R&M) investment, split across the Housing Condition Survey divisions. Repair and maintenance of historic environment assets requires traditional skills, generating green and sustainable jobs which tend to be longer held and see more money go into local economies in comparison to new build.

We consider that sustainable procurement from public sector spend (and others including grant giving bodies) on climate change interventions can derive greater benefit for local business and supply chains. Grant giving bodies such as HES can focus more strongly on Prioritising local businesses and sustainable procurement local procurement to maximise the support to local economies; including green recovery projects such as repair, maintenance, energy efficiency, retrofit, low carbon projects, and support climate justice agenda i.e. how to maximise the benefits of grants to those most in need? For example, grants programmes could be used to subsidise or reduce costs of training or supply of materials, therefore lessening labour cost and generating local employment, rather than be used to subsidise overall ‘project costs’.

Recommendations:

We believe that in order to optimise the effectiveness of the actions and proposals and policies for Buildings, it is essential that historic and traditional buildings, both designated and non-designated, are viewed as an integral and valuable component of the nation’s building stock. It is also important to recognise that while decarbonisation and energy efficiency actions may require different approaches for historic / traditional buildings to those required for non-historic buildings, this does not mean that historic environment assets are inherently problematic, or ‘hard to treat’ in this context. Such phrases can act as a significant barrier and disincentive.

Decarbonising existing buildings will require ongoing behaviour and culture change, from the national to local level, to ensure that policies, proposals and actions mainstream the historic environment in their development and delivery, and view the historic environment as an opportunity rather than a barrier to achieving the desired climate change outcomes and Green Recovery.

In view of this, we welcome the recognition of the need for a nuanced rather than ‘one size fits all’ approach to decarbonising heat, reflecting the unique cultural value of the building stock in Scotland, with the inclusion of a new action focused specifically on the historic environment (Work with stakeholders to further understand and support the application and use of low and zero emissions heating within designated historic environment assets and hard to treat buildings). However, we believe that consultation and collaboration on historic/ traditional buildings also needs to be embedded into actions across the Buildings theme. We are happy to work collaboratively with the Scottish Government and stakeholders over this transition, and on retrofit and renovation in particular, to help understand, research, input, advise and, where applicable, pilot, trial and support some of the policy actions.

We also recommend that the terms ‘designated’ and ‘hard to treat’ are omitted from the new action (Work with stakeholders to further understand and support the application and use of low and zero emissions heating within designated historic environment assets and hard to treat buildings). The majority of historic environment assets are not designated, and restricting this action to only designated assets would significantly limit its scope to contribute to the Buildings outcomes. As discussed above, the presentation of historic / traditional buildings as ‘hard to treat’ is unhelpful, and actions in the CCPu should be seeking to dispel rather than reinforce this perception.

5 Reflecting particularly on the CCPu sections on ‘Green Recovery’ and ‘Cross-Sector issues’,to which extent does the CCPu deliver a green recovery?

Please enter your response in the text box provided.: 

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