

Response ID ANON-ZYNJ-3TFJ-2

Submitted to Proposals for a Heat in Buildings Bill: Consultation
Submitted on 2024-03-07 11:25:52

1. Ministerial Foreword

2. The Heat in Buildings Standard - covering heating and energy efficiency

1 To what extent do you support our proposal to prohibit the use of polluting heating systems in all buildings after 2045?

Strongly support

Please include any additional comments below:

2 To what extent do you agree that we should introduce a minimum energy efficiency standard to be met by private sector landlords by the end of 2028 (even if they are already using clean heating)?

Strongly support

Please include any additional comments below:

Anecdotal evidence raised in HIB workshops we have attended, already suggests that the proposals and reforms may prompt many landlords to exit the rental market, causing a rental housing shortage. But if this is addressed in good time by supporting to the maximum the provision of public rented sector accommodation that meets the new standards, then the overall outcome would be positive in raising the average EE quality of rental sector. But this needs urgent commitment and public engagement as the issue is already being raised as a criticism of the proposals.

3 To what extent do you agree that we should introduce a minimum energy efficiency standard to be met in owner occupied homes (which still have a polluting heating system) by the end of 2033?

Strongly support

Please include any additional comments below:

Ten years is a realistic time scale but will only work if there is a major public education campaign to gain public understanding and support and sufficient training of tradespeople to carry out the necessary works.

4 Do you agree with our proposal to set a minimum energy efficiency standard that can be met by either installing a straightforward list of measures, or showing a good level of energy efficiency based on a reformed EPC fabric efficiency metric?

Strongly support

Please include any additional comments below:

Simplicity is very important, clearly emphasising the benefits, to show that (a) the changes are in all our interest and (b) these are beneficial changes to be welcomed, not draconian demands and (c) timescales are generous.

5 What is your view on the initial proposed list of measures to meet the minimum energy efficiency standard?

Somewhat support

Please include any additional comments below:

The list lacks reference to domestic energy generation such as solar/PV panels and wind.

6 Do you think that properties for which most or all of the measures on the initial proposed list are not relevant should be required to meet an equivalent minimum energy efficiency standard?

D. Yes – they should be required to meet the standard and additional measures should be included on the list (such as solid wall insulation, solid floor insulation and flat roof insulation), but they should only be required to install some of these where feasible, and they should be allowed additional time to do so.

Please include any additional comments below:

The list of measures needs to be more comprehensive, to include solar/PV and wind generation at a domestic scale.

7 Do you think that an alternative approach to setting the minimum energy efficiency standard is required?

No

Please include any additional comments below:

8 Do you agree that the use of bioenergy should continue to be permitted in certain circumstances?

Yes, it should be permitted for those buildings already using it, Yes, it should be permitted for those buildings who have no other clean heating system available, Yes, it should be permitted for those buildings already using it and for those buildings who have no other clean heating system available

Please include any additional comments below:

If permitted, it should only be permitted provided there are strict criteria for the sustainability of the fuel.

3. Property Purchases

9 To what extent do you support the requirement to end the use of polluting heating following a property purchase?

Strongly support

Please include any additional comments below:

10 We are proposing to give those purchasing a property a 'grace period' to end their use of polluting heating. Do you agree with this proposal?

Yes – the grace period should be three years.

Please include any additional comments below:

Ideally, the sooner the better, but three years is more realistic than two, given the need to build up sufficient number of qualified installers; there is bound to be some backlog.

11 To what extent do you support our proposal to apply a cost-cap where people are required to end their use of polluting heating following a property purchase?

Not Answered

Please include any additional comments below:

12 Which of the following methods of applying a cost-cap do you support?

Not Answered

If another, please suggest below:

13 To what extent do you support the proposal that the Scottish Ministers should be given powers to extend the circumstances in future (beyond a property purchase) in which people could be required to end their use of polluting heating? This could be, for example, preventing the installation of new fossil fuel boilers when replacing the heating in your home or business premises?

Strongly support

Please include any additional comments below:

Support is predicated on the decisions being subject to parliamentary scrutiny

4. Connecting to Heat Networks

14 To what extent do you support our proposal to provide local authorities (and Scottish Ministers) with powers to require buildings within a Heat Network Zone to end their use of polluting heating systems by a given date?

Strongly support

Please include any additional comments below:

A sufficient timeframe is needed to ensure as many building as possible within a heat network are connected and benefit from it, e.g. within 2-5 years of the Heat Network Zone being created.

15 To what extent do you support our proposal to provide powers to local authorities (or Scottish Ministers) that require developers to connect new buildings within Heat Network Zones to a heat network?

Strongly support

Please include any additional comments below:

16 To what extent do you support our proposal to require occupiers of non-domestic properties to provide information about unused heat on their premises?

Not Answered

Please include any additional comments below:

17 To what extent do you support our proposal to potentially require buildings with unused heat to provide this to a local heat network?

Strongly support

Please include any additional comments below:

This seems a sensible and fair proposal: e.g. if there is a server room with a lot of excess heat and there is a local heat network which could use it – it would seem to make heat networks much more viable.

5. Monitoring and Enforcement

18 We will need to have a way to monitor if people are meeting the Heat in Buildings Standard, and discussed two options for this. Which do you support?

Submitting EPCs alone.

Please include any additional comments below:

19 We will need to have a way to enforce the Heat in Buildings Standard. We discussed possible options to help achieve compliance. What are your views on these ideas?

I do not support the suggested enforcement tools, but have another suggestion (please provide below).

Please include any additional comments below:

I would support more positive motivational measures. For example, the waiver of stamp duty on the first sale of a property after compliance is achieved. Or favourable VAT rates on materials and labour for compliance works if EPC-certificated.

20 To what extent do you support our proposals to modify the Standard or exempt certain people from the need to meet the Heat in Buildings Standard?

Somewhat support

Please include any additional comments below:

I would prefer to see a progressive system devised e.g. a sliding scale whereby the 'least able to pay' are exempted but the 'most able to pay' are effectively taxed to at least partially fund the conversion of homes where exemptions apply.

21 Which people, businesses, or types of buildings, if any, should be eligible for a modified standard or exemptions?

Please include any additional comments below:

People: those officially in poverty according to current definitions. Buildings: Public buildings which serve as warm spaces e.g. libraries.

22 To what extent do you support our proposals to give certain people extra time to meet the Heat in Buildings Standard?

Somewhat support

Please include any additional comments below:

If an appropriately equitable, progressive sliding-scale funding system is devised, there should be no financial reason for delays, but supply side issues (materials, fitters etc) may still necessitate an extra time option, on that basis only.

23 Which people, businesses or types of buildings, if any, should be eligible for extra time?

Please include any additional comments below:

People: those officially in poverty according to current definitions, unless fully funded grants are available. Public buildings which serve as warm spaces e.g. libraries.

Note: if a full grant is available, there should not be the need for extra time.

6. Public Sector Buildings

24 To what extent do you support our proposal to require all buildings owned by a Scottish public authority to be using clean heating systems by 2038?

Not Answered

Please include any additional comments below:

25 We are considering the following further duties on public sector organisations to support planning for the transition by 2038. Please tell us which option(s) you would support.

Placing a new duty on public sector organisations which would, from 2025, prevent them from replacing a polluting heating system with another (unless impractical);

Please include any additional comments below:

This seems a very sensible proposal to avoid stranded assets and new polluting systems being invested in only to be removed before the end of their normal lifespan if the transition by 2038 goes ahead.

About you

29 What is your name?

Name:

Sarah Komashko

30 What is your email address?

Email:

sarahk@quaker.org.uk

31 Are you responding as an individual or an organisation?

Organisation

32 What is your organisation?

Organisation:

Quakers in Scotland (Parliamentary Engagement Working Group)

33 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

34 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

35 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

Evaluation

36 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: