

## Response ID ANON-G2CR-PZCX-K

Submitted to **Heat in buildings strategy - achieving net zero emissions: consultation**  
Submitted on 2021-04-29 16:41:32

### Chapter 2: A 2045 Pathway for Scotland's Homes and Buildings

**1 To what extent do you support the pathway set out for achieving the 2045 net zero target and the interim 2030 target?**

Please explain your view:

**2 What are your views on any risks of unintended consequences from this pathway?**

Please explain your view:

**3 What are your views on our assessment of strategic technologies in low and no regrets areas to 2030?**

Please explain your view:

Could the document explain more clearly the 'low and no regrets' terminology?

**4 What function should a new heat target serve?**

Please explain your view:

**5 How do you think a new heat target should account for the need to deliver against our statutory fuel poverty targets?**

Please explain your view:

**6 Do you agree that a new heat target should apply to heat in buildings, distinct from industrial heat?**

Not Answered

Please explain your view:

**7 What form should a new heat target take and why?**

Please explain your view:

**8 At what level should the target(s) be set and for what date?**

Please explain your view:

### Chapter 3: People

**9 What are the most significant actions we can take to ensure that Scotland's people and organisations are meaningfully engaged in the net zero heat transition?**

Please explain your view:

**10 What in your view are the opportunities, if any, available to key organisations, such as local government, businesses and trade associations and community or other non-government organisations, in supporting this public engagement activity?**

Please explain your view:

The Institute could help support public engagement by organising and promoting training courses/seminars/webinars on this topic, with specific reference to the historic environment, where these is a shared common interest.

The Institute would welcome further recognition/acknowledgement of how existing historic building stock can support the net-zero target (more sustainable in many ways than new build etc).

**11 In your opinion, could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic? (age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief)**

Please explain your view:

**12 In your opinion could any of the proposals set out in this strategy have an adverse impact on children's' rights and wellbeing?**

Please explain your view:

**13 What further action can we take to support people to make informed choices on the energy efficiency and heating options available to them?**

**Please explain your view:**

Remind people of the benefits of natural ventilation to buildings and occupants, necessary in this and future pandemics, openable windows, unblocked flues etc, and certainly not promoting the sealing up of buildings that are traditionally constructed and vapour permeable (as a rule of thumb, built before 1919, but also many built after that date).

**14 What is your view on the current level of support and advice provided through existing services such as Home Energy Scotland and the Energy Efficiency Business Support service?**

**Please explain your view:**

**15 Are there any further suggestions that you could provide on how the customer journey through these delivery services could be improved, in light of the ambitions set out in this strategy?**

**Please explain your view:**

**16 What are the most appropriate steps we can take within our powers to ensure sufficient consumer protection for supported energy efficiency or zero emissions heat installations?**

**Please explain your view:**

In the light of Grenfell. Government must expect to pay for damage arising from inexpert application of measures ill-suited to the building fabric.

**17 Do you have views on whether we should adopt the use of the UK government's TrustMark quality assurance framework?**

**Please explain your view:**

Does this guarantee that installers of cladding know what they are doing?

**18 In your view, is there any further action that we, or other key organisations (please specify), can take to protect those on lower incomes, and those in or at risk of falling into fuel poverty, from any negative cost impact as a result of the zero emissions buildings transition?**

**Please explain your view:**

Energy saving measures are unlikely to recoup costs for all parts of society. Additional funding support would need to be offered to that those on lower incomes can be supported in the transition to zero emissions. But also greater promotion of the importance of small changes, than can help, it doesn't always have to be the big, expensive interventions that can help with reducing emissions or making your house more energy efficient.

**19 What are your views on our approach to phasing out funding for fossil fuel heating systems by 2024 where it is not detrimental to our fuel poverty objectives? Do you think that this could be achieved any sooner than 2024, and if so how?**

**Please explain your view:**

**20 What changes can be made to the Strategy to help maximise positive impacts and minimise negative ones on people experiencing fuel poverty and other vulnerable groups?**

**Please explain your view:**

## **Chapter 4: Place**

**21 What are your views on how we can support place-based deployment of zero emissions heat within our delivery programmes?**

**Please explain your view:**

**22 What is your view on how best to engage, and support, local communities in the planning and implementation of the heat transition in their area?**

**Please explain your view:**

**23 What role do you think community anchor organisations could play in supporting the heat transition?**

**Please explain your view:**

**24 In your opinion, what steps can we take to ensure that policies set out in this strategy do not unfairly impact Island and other remote communities?**

Please explain your view:

**25 What is your view on the timescales proposed for Local Heat and Energy Efficiency Strategies (LHEES)?**

Please explain your view:

**26 Do you agree with the approach to LHEES we have set out? If not, please give reasons to support this.**

Not Answered

Please explain your view:

**27 What are your views on what Permitted Development Rights might help enable in the heat transition, in addition to those we have already included in the Permitted Development Rights review programme?**

Please explain your view:

The skills of planners are constrained enough by existing PDR without adding to those complications.

An issue is how the different consultations all fit together. In regeneration areas for example the NHLF and HES require any new proposals to be in line with the conditions of the CARS grant etc. Relaxation of PD rights to achieve more energy efficient homes/the heat transition can often clash with this. There may be some areas (as acknowledged in the consultation document) where heat transition technologies/alterations are at odds with the heritage legislation.

## **Chapter 8: Developing a Regulatory Framework for Zero Emissions Buildings**

**48 What are your views on the regulatory actions set out in the proposed regulatory framework?**

Please explain your view:

**49 What are your views on the timeframes for the application of the regulation we have set out?**

Please explain your view:

**50 Alongside our regulatory approach, we are developing our delivery programmes to support the acceleration towards net zero emissions for buildings (as set out in Chapter 6: Kick starting investment in the transition). What are your views on how our delivery programmes could support compliance with regulation?**

Please explain your view:

**51 What other mechanisms/support may be required to ensure that regulation is fair and equitable for all?**

Please explain your view:

## **Chapter 11: Monitoring, Evaluation and Future Decision Making**

**62 Do you agree with our proposals for a monitoring and evaluation framework? If not, please state your reasons and suggested improvements.**

Not Answered

Please explain your view:

**63 What are your views on how lessons learned from heat and energy efficiency policy and programmes should be shared with the sector and key stakeholders to ensure that Scotland benefits from the public investment outlined above?**

Please explain your view:

**64 Finally, is there any other information you would like to provide us with that is relevant to the development of Scotland's Heat in Building Strategy?**

Please explain your view:

## **Environmental Report**

**65 What are your views on the accuracy and scope of the information used to describe the Strategic Environmental Assessment (SEA) environmental baseline set out in the Environmental Report?**

Please explain your view:

**66 What are your views on the reasonable alternatives set out in the Environmental Report?**

Please explain your view:

**67 What are your views on the predicted environmental effects as set out in the Environmental Report?**

Please explain your view:

**68 What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?**

Please explain your view:

## **General questions**

**69 Is there any further information you wish to provide on the content set out in this draft Strategy?**

Please explain your view:

The recent consultation 'Evidencing how Pre-1919 Dwellings can support Net Zero in Scotland' explaining HES' approach could be referenced in this document (we imagine the two consultations are connected). More more could be made of this in this current consultation in Chapter 4 under retrofit programmes by making people aware of the benefits of how traditional buildings were built to perform.

**70 Is there anything you would like to highlight about the role, opportunities for and constraints of, specific types of organisation (such as local government, other public sector, trade associations, individual business organisations, charities, environmental organisation, community groups) in contributing to the transition to zero emissions buildings, in particular over the next five to ten years?**

Please explain your view:

The Institute support the intention to consult with HES on the impacts of heat transition for historic environment. In addition and in relation to PD and implementation of planning policy, they should also consider advice from those implementing policy on day to day basis, such as local authority conservation officers, and those with experience of managing heritage led regeneration schemes.

## **About you**

**What is your name?**

**Name:**

Frances Swanston

**What is your email address?**

**Email:**

fcswanston@live.co.uk

**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

Institute of Historic Buildings Conservation (Scotland Branch)

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

Publish response only (without 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

## **Evaluation**

**28 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?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

The consultation has 70 questions, which is a lot to process. It is difficult get the right balance between providing enough information/not enough information and putting people off with a lot of questions, but needing to get valuable data.

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

Very satisfied

**Please enter comments here.:**