

## Delivering net zero for Scotland's buildings - Heat in Buildings Bill: consultation

6/March/2024

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's existing built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

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### BEFS opening statement:

BEFS strongly supports the drive to net zero and agrees that how we heat our buildings will be paramount to achieving this necessary goal.

BEFS responds to a wide range of consultations on the built environment and our responses are designed to be constructive at all times. Our range of responses can be found here:

<https://www.befs.org.uk/resources/consultations/>

BEFS also supports the detailed work done across many teams within the Scottish Government to provide the documents forming and supporting this consultation. The undertaking is huge, and the work done to this stage by all parties is respected.

Unfortunately, as presented, BEFS cannot support this legislation – BEFS considers that the level of detail currently is not fit for purpose. There is not enough information, as it stands, to meaningfully answer many of the consultation questions, with more questions than answers raised in many sections. Furthermore, the uncertainty within the current proposals do not support the significant increase in pace and scale of activity – highlighted as necessary within the Auditor General report *Decarbonising heat in homes*. Whilst it is fair that there is considerable time to “get these matters right” in secondary legislation- BEFS are currently unconvinced that we have yet fully assessed what it is we really need to ‘get right’.

BEFS is concerned that the level of uncertainty within the document could lead to many unintended consequences, not least public disillusionment and misunderstanding about what is both possible, and best, for a wide range of building types and their occupants. There are many references and wording throughout the consultation around what actions or interventions are ‘appropriate’ but no understanding or clarity around who is deciding and informing what ‘appropriate’ means in the many circumstances cited.

Much of the work described within the legislation is, as termed within *Decarbonising heat in homes*, as at an ‘early stage’ – making it tricky for respondents to be able to fully express constructive views. The uncertainty around EPC reform, the lack of capacity within the national grid, the scarcity of skills to complete the aims – all of these factors mean that delivery of the Heat in Buildings Bill is unlikely in the current environment.

BEFS acknowledged that secondary legislation will be necessary at many points along the journey to HIB legislation coming into place, but believes that the current questions remaining, and uncertainties within the proposals, make it almost impossible to meaningfully respond.

Some of BEFS Members have expressed that they are, of course, in favour of the desirability of this Policy. However there are some serious concerns over how different schemes may be actually implemented in terms of impacts upon historic buildings and buried remains especially if they were to be undertaken under new

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Permitted Development rights. Not all such proposals/cases will have significant impacts, but it is necessary to determine which archaeology and historic built environment should be assessed and included in any new guidance/policy relating to actions for Heat in Buildings legislation.

BEFS has answered all questions where it was felt that comment could usefully be made- but please note that whilst specific responses may support a particular aspect of the legislation, BEFS reiterates that in the current form this proposed legislation would not, and could not, achieve its stated aims.

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To reiterate our response to the Draft Heat in Buildings consultation from 2021:

### *Meaningful change:*

*Scotland's home-owners, businesses, suppliers, and manufacturers need as clear an understanding as possible of who needs to do what, and by when. There needs to be an understanding of what heat systems will be recommended, what training needs to be in place, and what schemes will be available to help alleviate costs, or support training and further CPD. Consumer confidence needs to be built in the understanding of reliable systems, with the assurance that advice is accurate and impartial, and interventions will be well-suited to building type with skilled installation choices available. All need to understand that a fabric first incorporating a maintenance first approach will pay dividends, and help to support the transition to net zero. But it is not possible without a robust skills supply chain to maintain all of Scotland's homes – from the traditionally built to the off-site modular, and everything in between.*

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

- Somewhat support

Please include any additional comments below

Fully support the proposals in principle but agree with recommendations made by the office of the Auditor General that a delivery plan needs to be produced outlining clearer actions, budgets, timescales, role clarity for partners and impact of the related actions. This does need a skills delivery plan and a public finance plan. BEFS sees these - delivery, skills, and finance - plans as integral to the ability to make decisions/pass the final legislation.

Further clarity on hot water heating may be beneficial within the document as the definition given discusses the heating system as the 'main heating system' which "heats the largest proportion of the dwelling". However, 2.10 states "A prohibition on polluting heating would ban the use of systems like gas boilers, oil boilers or LPG to heat *or provide hot water* in our homes or non-domestic premises."

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Then 2.11 suggests such measures as heat pumps and electric storage heaters – neither of which (on their own) provide hot water.

The intended steps in 2.16 – particularly the consideration for the development of an assessment tool (based around typologies from the description) appears to be a positive but with regard to different typologies, and traditionally constructed buildings (which are mentioned) in particular a note of caution is given in relation to current EPC assessments and appropriateness of interventions.

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Here BEFS includes a short extract from our response to the EPC reform consultation in 2023.

*[...] we are pleased to see greater consideration given to fabric within the proposals but would agree with and support comments made by the National Trust for Scotland that 'ultimately the performance of building fabric is linked to building condition.' It would be hoped that inclusion of Fabric Rating could and should positively contribute to a fabric first and maintenance approach to Scotland's buildings.*

*BEFS considers that any changes to the EPC should reflect the embodied carbon inherent in existing and historic properties. Additionally, we consider that as traditionally constructed buildings and modern constructed properties differ in how they function, a more nuanced approach should be incorporated into any plans to change EPCs. We further support the point made by the NTS that 'We would encourage there to be a place for building condition noted within ongoing EPC reform to ensure energy efficiency and fabric condition do not become topics that become disconnected'.*

There are also a high number of non-polluting electric heating systems in use which are out-dated and do not provide efficient heating, reduce fuel poverty, or provide occupant comfort. There is nothing to incentivise these being changed/upgraded – particularly by landlords.

Prohibiting polluting heating systems also needs to hand in hand with behaviour change and better behaviour understanding to reduce energy demand more broadly.

**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)?**

- Somewhat support

Please include any additional comments below

As tenants in private accommodation often have the least agency in what happens to where they are living, this seems a positive move. However private rented homes can and do include traditionally built properties, with many of these in tenements – it is paramount that when meeting the energy efficiency standards only

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works appropriate to the building are carried out, this will be essential to maintaining air quality, preventing damp, and ensuring the health of occupants.

There is the potential that these measures will incentive and hasten poor quality interventions.

There are also a high number of non-polluting electric heating systems in use which are out dated and do not provide efficient heating, reduce fuel poverty, or provide occupant comfort. There is nothing to incentivise these being changed/upgraded – particularly by landlords.

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**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?**

- Somewhat support

Please include any additional comments below

Minimum energy efficiency standards seem a sensible step in the path to net zero. However inaccurate EPC assessments for traditional properties, and a short-time frame could result in appropriate measures.

It is however appropriate that the date for owner occupied homes is the same for empty and short-term lets.

Within this part of the legislation it is imperative that maintenance and fabric first receive the greatest attention. Without a wind and watertight building which is well maintained any interventions may be detrimental to the building, occupant health, and not result in the energy reductions expected – failing to improve building performance, negatively impacting on occupant health, and failing to meet fuel poverty aims.

BEFS questions why the EPC graphics in the report using information from the 2019 Scottish House Condition Survey, and not 2021?

BEFS also commends the climate x change *Whole building assessment for energy efficient and zero direct emissions heat in multi-owner and mixed use buildings* (March 2023) when considering the challenges around assessing MoMu buildings. Without such assessment the benefits to these households from the changes made, and the dangers to damaging building fabric, are greatly increased.

**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?**

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- Somewhat oppose

Please include any additional comments below

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There are a number of issues with this section.

Namely that:

- No mention is given to maintenance and wind and water tightness of the building fabric.
- EPC is relied upon when it is known to be inaccurate for traditional constructed buildings.
- Whilst the list of measures is currently indicative and a technical specification of the measures would be further consulted upon prior to regulations – the ‘simple’ list when applied across typologies is incredibly complex.
- No details are given as to how “feasible” might be determined, and by whom.

BEFS also has concerns that, despite the failings within EPCs, without a clear baseline derived from a standardised assessment (such as EPC) will the new energy efficiency standards be developed/effective in the ways intended for each property?

The wording of the above also implies that meeting the standard through an EPC will be based on the “reformed EPC” – given the number of sales per year will the (then) older EPC be valid for a period of time, or is the intention that all households would need a new EPC should they wish this to the evidence for meeting the standard?

To reiterate: BEFS also commends the climate x change *Whole building assessment for energy efficient and zero direct emissions heat in multi-owner and mixed use buildings* (March 2023) when considering the challenges around assessing MoMu buildings. Without such assessment the benefits to these households from the changes made, and the dangers to damaging building fabric, are greatly increased.

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

- Strongly oppose

Please include any additional comments below

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Whilst the list of measures is currently indicative and a technical specification of the measures would be further consulted upon prior to regulations – the ‘simple’ list when applied across typologies is incredibly complex.

No details are given as to how “feasible” might be determined, and by whom.

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Whilst it is understood that owners do often want a ‘tick list’ of what is possible and what they “should do” this does not reflect the complexity of building types and the reality of the situation.

Further, measures such as thick curtains, shutters, and chimney balloons could be added. These are low intervention, impactful measures which improve occupant comfort and reduce energy use without being detrimental to building fabric.

More detailed comments in relation to the list (as it stands) are as follows:

Why cavity wall insulation? Could just be listed as appropriate/feasible wall insulation.

There will be significant struggles to meet the levels(depth) of insulation listed in many properties.

Given the alternative is to meet the standard baseline of the EPC – is it beneficial, and viable, to introduce this overlapping and secondary list? What is the intended outcome?

Who is assessing the installation of these measures and the compliance? There is mention of evidence (invoices/photographs) but who is checking these, storing these and how is the information being captured at national level to ensure aims are met?

**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?**

**A. No – these properties should be considered compliant once they have installed all the measures that are appropriate for their building type, even if this is few or no measures**

Please include any additional comments below

If the measures are not feasible, or appropriate for the building type why would they then not meet the standard? This approach seems fair and appropriate. This will apply to few buildings, but prevents poor approaches to building fabric being taken unnecessarily.

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

- Don't know

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Please include any additional comments below

BEFS can see the benefits of this approach, particularly to traditionally constructed buildings. However, there is concern in a two-tier system coming into being – and which receives primacy? What impact will this have in relation to EPCs during the conveyancing process? More clarity is needed on how the two systems will work in tandem.

Point 3.4 in the consultation is clear that an EPC must be produced during the selling process, would meeting the new standard also need to be produced?

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 **and** for those buildings who have no other clean heating system available

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

- Somewhat support

Please include any additional comments below

Seems an appropriate 'carrot' to ensure engagement and progress to meet net zero.

However, this could incentivise rapid and ill-founded decisions for building fabric.

Potential unintended consequences mean that this could delay sales and stagnate the housing market, particularly as the consultation paper is clear that prices will reduce over-time and those 'holding off' may well have to invest less in the changes as the market changes and adapts.

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3.5 implies that meeting the HIB standard will incentivise sellers – is there evidence that the current EPC reports incentivise sellers (or buyers)?

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With regard to the caveats above in relation to the setting of the legally binding standard, the point of sale appears to be an appropriate trigger. However, whilst many technological developments and interventions have standardised outcomes, much energy use is based on behaviours not just energy efficiency. Different owners may require different interventions to better suit their way of living (numbers/age of residents). How this is taken into account at sale – may make any interventions more suited to being taken-on by the buyer, rather than the seller. This also avoids the scenario where, as a seller, there is not the incentive to make high-quality, building-appropriate interventions when the cheapest ‘solutions’ may theoretically meet the energy efficiency/EPC standards.

On p32 the example box suggests that the conveyancer will “provide advice to the purchaser about their obligations” and mentions the heating system directly. Without significant further training and development this is using the conveyancer as a safety net. Has the profession agreed to this inclusion within their activity? Roles need significantly further development and clarity (which is detailed in 3.12) before any more meaningful comments can be given.

**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?**

- No, please provide reasons for your view.

Please include any additional comments below

The grace period should be informed by significant study of the market to ensure that the maintenance, repair, and retrofit skills needed for a wide range of property typologies are possible. This applies even more acutely for multiple ownership multiple use buildings (such as tenements).

The grace period will also be impacted by the finance implications which could include mortgage providers in the future. They may well have time-limits on when interventions need to take place.

BEFS also note that it may not be blanket approach for all building types – and the detail of the grace period could be different for typologies.



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Current uncertainty within the legislation suggested mean that this cannot be determined until much more is known around implementation and delivery.

### 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?

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- Neither support nor oppose

Please include any additional comments below

As set -out there are multiple questions which need to be answered before a cost-cap can be supported.

To what measures does the cost-cap apply? There is not enough information within the paper to judge at present. Does/will the cost-cap apply to fabric first measures, necessary repair and maintenance prior to interventions? What scale of works will/could the cost cap apply to – from curtains to heat pumps? Does the cost-cap also cover surveying and advice prior to appropriate interventions being decided upon?

Concerns raised also in relation for the occurrence of the fractured pattern of ownership in tenemental properties. This fractured approach can negatively affect both how the fabric of the building operates for the future, and the efficiency of the systems put-in operates for efficiency, occupant health, and value of the expected benefits.

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

- None.

If another, please suggest below

The methods discussed do not cover what the cap could/will apply to: (as detailed above) - Does/will the cost-cap apply to fabric first measures, necessary repair and maintenance prior to interventions? What scale of works will/could the cost cap apply to – from curtains to heat pumps? Does the cost-cap also cover surveying and advice prior to actions being decided upon?

Additionally, the 'purchase price' cap seems potentially misleading. Given the prior discussion around finance and mortgages it should be noted that finance is currently most usually provided on the 'valuation' not the purchase price.

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It is noted that there are contradictions within the list and that cost and size can be very different within different housing markets, however should the measure not be related to the benefits of the measures, rather than size or cost?

Clarity as to how a cost-cap and personal abeyances interact should be more clearly expressed.

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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?

- Don't know

Please include any additional comments below

This seems too vague for legislation, and introduces further doubt and uncertainty. What other legislation has been formed in this way, an example would be helpful to illustrate?

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?

- Somewhat support

Please include any additional comments below

Seems an appropriate incentivisation, but perhaps a note of caution in relation to decision making for multiple ownership multiple use buildings. Joining a heat network may be more appropriate for a whole block of flats, but as this is more than just meeting the energy efficiency standard – would all owners need to agree?

It is noted that within the *Decarbonising heat in homes* report that current heat networks are “predominantly fuelled by gas” and whilst not producing further emissions at point of use within a property will need to be transitioned away from fossil fuels to meet net zero aims.

Is there research underway as to how many properties are covered by **potential** LHEES networks, and also **likely** networks as not all will go ahead? This could help to unpick the numbers for what numbers and

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typologies the HIB legislation is covering – as well as what % of property typologies could be given more focus for interventions (should they not be connecting to a heat network).

**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?**

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- Somewhat support
- 

Please include any additional comments below

Important to support the development of networks, will developers question the monopoly of being tied to one supplier, particularly if it's the local authority.

Additionally, does this mean that planning authorities will be further pressured to say yes to large scale developments to ensure enough units to support/use the nascent heat network?

**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?**

- Don't know

Please include any additional comments below

Any measures need to be appropriate for the scale of the organisation owning/running/managing the building – not the scale of the building itself.

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

- Don't know

Please include any additional comments below

No answer

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**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?**

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- Another method, please suggest below or explain your selected answer

Please include any additional comments below

There is an issue of monitoring and compliance across a range of measures across the planning and build regulations arena due to lack of capacity for 'enforcement'.

Who is doing the monitoring? Without this information it is difficult to assess what is most appropriate.

There is nothing here about monitoring the energy efficiency standard which makes it unclear why it's a mechanism that owners would use?

The term 'submitting EPCs' is an interesting term as given EPCs exist as part of the conveyancing process where would they be submitted to? And, why could these not just be examined anyway – as is mentioned in the 'sampling' section, and in 5.4?

Monitoring should not be put on the individual owner. If enforcement (mentioned in Q19) is happening then monitoring should be available at national level as a matter of course.

Given the scale of interventions in many properties (but not all) – would building warrant data help to assess and monitor meeting the standard?

And is there a role for Improvement Service data team within this?

**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

Whilst ensuring that action takes place BEFS appreciates the challenges around enforcement.

There are challenges to all the suggestions.

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Mechanisms to use mortgages/insurance would significantly impact those industries and with the additional burdens perhaps drive-up costs in this area, which could not be seen as positive.

Additional council-tax and rates charges surely has the same arguments as made for civil penalties/ fines – given lack of finance will be the challenge to many.

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Incentives/reductions may be a greater benefit rather than charges and penalties. However how this is funded is a significant challenge.

A significant amount of monitoring and enforcement seems to most naturally fit with local and planning authorities, and how this is resourced will be key.

### 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?

- Strongly support

Please include any additional comments below

Needs to be easy for those needing exemptions.

And BEFS questions where the granting of exemptions/data/and monitoring overlap?

And is any exemption in perpetuity, or until a specified number of years?

Is there any cost-limit to the process of receiving an exemption or modification?

### 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

Those buildings about to be demolished or significantly refurbished.

Those buildings whose current occupants whether through age, health, mobility, ability – negates the benefits – whether through the distress of disruption or feasibility.

Protected buildings where interventions would damage the characteristics which make the building worthy of protection.

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Whilst it could be thought that all traditional, listed, and conservation area buildings may need more time – a non-nuanced approach could again undermine the potential and benefits of these buildings, leaving them as considered 'hard to treat'.

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

- Strongly support

Please include any additional comments below

Significant further development is needed on cost (what is included) and feasibility for many property owners.

Significant workforce development is needed before fabric-first measures are addressed to enable energy efficiency and retrofit measures to take place. A key caveat is the need for incentivising and funding skills development e.g. apart from Scotland the RoUK can access free training for built heritage retrofitting needs i.e. widely available NOCN resource Level 3 Award in Energy Efficiency for Older and Traditional Buildings – Retrofit Course (2 Day).

In Scotland the course is either full price or partially funded (very limited).

The work of the cross-party group on Tenement Maintenance work needs to be significantly progressed – and the outcomes of the work of the Scottish Law Commission suggestions legislated upon before works in tenemental properties will be feasible.

Additionally, a full response to the recommendations within the working group report on Multiple Owner Multiple Use buildings is also necessary.

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

Please include any additional comments below

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Charitably owned – many third and charitable sectors will only have one year of funding, how are they to plan for and install these measures when they may take longer than the funding period of the organisation. They cannot give certainty to surveyors and installers.

Some non-domestic sites where extended closure could prevent the facility from being able to exist.

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Rural properties where the electricity supply may need to be upgraded to be able to provide electric heating to home/s.

Tenemental properties. There are many issues in this area – but questions remain around:

On the issue of abeyances, it mentions third-party consent.

What happens to other owners of a tenement building not agreeing to work being done on communal parts of the buildings which would be necessary for a communal heat pump/district heating system to be installed?

As heat pumps for individual flats are likely to have insurmountable practicable problems on a large scale (they also need siting on communal areas, but others as well), is this a loophole that allows tenement owners to get out of the requirements?

Alternatively, if this isn't an exemption, would all owners be sanctioned for their building not approving a communal system (heat pump or district heating), when it was deemed reasonably practicable and technically feasible - and if so, what about the owners who voted in favour but were voted down - would they still be sanctioned?

Significant further development is needed on cost (what is included) and feasibility for many property owners.

Significant workforce development across all professions and craft areas is needed before fabric-first measures are addressed to enable energy efficiency and retrofit measures to take place.

The work of the cross-party group on Tenement Maintenance work needs to be significantly progressed – and the outcomes of the work of the Scottish Law Commission suggestions legislated upon before works in tenemental properties will be feasible.

Additionally, a full response from the Scottish Government to the recommendations within the working group report on Multiple Owner Multiple Use buildings is also necessary.

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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?

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- Somewhat support

Please include any additional comments below

Some exemptions will apply to these buildings too – see suggested exemptions above.

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);
- Creating a new duty for each public body to develop and implement a plan to decarbonise their buildings;
- Placing a new statutory reporting duty on public sector organisations to demonstrate progress towards their 2038 objective (with the potential for the 2038 then to be non-statutory);
- and/or Placing no further statutory requirements on public sector organisations (instead relying on their ability to plan alongside our delivery and funding programmes to meet the 2038 objective)

Please include any additional comments below

Are the proposals financially viable?

Concerns over speed of actions and potential detriment to buildings through rushed actions. It is also possible that the scale of works suggested here would mean that the limited skilled workforce currently available would be in high demand, and domestic contracts would pay second fiddle. The skills pipeline (including traditional skills) will be essential to successful delivery of both public sector, non-domestic and domestic.

26. Do you agree with our proposals to include powers in the proposed Heat in Buildings Bill to change the current requirement in legislation for a narrowly-defined renewable heat target?

- Don't know



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Please include any additional comments below

Whilst appreciating the flexibility needed, this raises concerns that this flags to those not wishing to take action that things *might change*. This could add increasing uncertainty to an already fairly uncertain area. This could fail to give the market the certainty needed to help support and drive change.

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### 27. Do you agree that the Heat Networks (Scotland) Act 2021 should be amended in light of the passage of the Energy Act 2023?

- Yes

### 28. Are there any further amendments to the Heat Networks (Scotland) Act 2021 that the Scottish Government should consider?

Please include any additional comments below

During engagement with the Heat in Buildings team we were made aware of the proposals around development for the **Heat and Energy Efficiency Technical Suitability Assessment** tool. There were significant concerns from a wide range of participants as to how this was informed, what professions were engaged, what standards would be met through the tool, and how consumer protections were to be taken into account, particularly if any recommendations were made.

Recommendations are not part of EPCs currently because there are too many variables to take into account for each building and the occupants.

These issues are reiterated in the climate x change report, *Whole building assessment for energy efficient and zero direct emissions heat in multi-owner and mixed use buildings* (March 2023).

Further insight in this area will also be available shortly through BEFS Member, RICS -

<https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/real-estate-standards/retrofit>

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BEFS responses to a number of Consultations in relation to the Built Environment can be found at:  
<https://www.befs.org.uk/resources/consultations/>

### RESPONDENT INFORMATION

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Responding on behalf of an Organisation - **BEFS** (Built Environment Forum Scotland)

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