

HOPS Climate Change, Energy and Resources Sub-Committee

Heat in buildings strategy - achieving net zero emissions: consultation

Response – 30th April 2021

Thank you for the opportunity to comment on the strategy. This consultation seeks responses to 70 questions. While it would be tempting to provide a response to all of the questions given the cross-cutting nature of the topic this response from Heads of Planning Scotland (HoPS) will instead focus on those matters that of direct relevance to our interests. The specific question reference is included for completeness.

HoPS supports the aim for all our buildings to achieve net zero by 2045. The pathway set out would appear, in general, an appropriate one to achieve this aim. (Question 1)

A whole systems approach is identified, and the intention is to deploy a range of technologies to achieve heat demand reduction and increase energy efficiency. This is considered the correct approach. However, the unintended consequences may be, given the timing of rollout (and support) of certain technologies over others, that opportunities may be missed to maximise the benefits and take up of technologies that would make transition easier and on a larger scale. The capacity to deploy certain technologies may also impact on the ability to achieve targets. In addition, there is a clear need for coordination between policies, both nationally and locally, to achieve targets. The financial support, which must be provided for the implementation of the most appropriate solution(s) suitable to the locality, will be critical. (Question 2).

It is unclear whether there is an order of preference for the identified no or low regrets technologies that will be the focus of the policy for the next decade, although the obvious first step would be to improve energy efficiency. There appears to be an over-reliance on use of heat pumps, the installation of which will need to be significantly upscaled and there is a question of whether that is achievable. At this same time there would be potential benefits of speeding up deployment of heat networks and commercial scale hydrogen production (Questions 3 & 4).

It is HoPS position that Energy Plans should be read alongside/form part of the Development Plan process given that land use and energy are inextricably linked. This would also assist with engagement not only with the strategic energy future for the area but the more specific local context. There are opportunities to benefit from significant pre-existing engagement processes/channels undertaken in the preparation of the Development Plan that could be extended to consultation with energy infrastructure network providers (Question 9). Such a combined process would be a much simpler and coordinated approach that would help prevent consultation fatigue and dislocation of issues (Question 10).

For those communities off the gas grid, heat pump technologies combined with fabric improvements and/or additional secondary systems appears a sensible approach to reducing fuel poverty and could be deployed relatively quickly. However, as indicated above, capacity issues may restrict this deployment. For those communities on gas grid, where district heating systems may not be suitable, early investment and support for commercial scale hydrogen production to replace natural gas would be of wider benefit and allow easier transition with greater economies of scale that would have wider reach and therefore greater benefits (Question 19).

Placed based solutions will be more appropriately considered at local level. This is the benefit of having Energy Plans linked to development plans (Question 21). This is considered the best way to engage and support the community in the heat transition of their area (Question 22).

HoPS supports LHEES. HoPS consider that LHEES should have a statutory footing. However, consideration of energy issues is broader than simply the LHEES strategies that at the moment are concerned with particular solutions for focused areas rather than whole local authority areas. It would be more relevant, and consistent with emerging regulation, for Energy Plans to have the statutory footing and coordinated/integrated with the work of development plans (Question 25).

PDR is a narrow view on how the planning system can assist with achieving net zero. Land use planning is fundamental to tackling climate change, achieving net zero and ensuring that our new and existing homes and business premises are less energy intensive. Linked with Building Standards, it would help achieve the aims of addressing fuel poverty in Scotland. Deregulation in principle is accepted where appropriate and is unlikely to be an issue when considering technologies such as heat pumps. However, given the existing stock of older traditionally built housing, retrofitting energy efficiency measures that may damage not only the fabric of the building but the aesthetic appearance of them is likely to be of greater concern. The ongoing work to consider these aspects by Scottish Government is welcome as is the continued involvement of HoPS in determining the recommendations/outcomes (Question 27).