Member's Discussion – Scotland Heat in Buildings Consultation

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  - Please note this session is being recorded for note taking purposes.

Agenda

THE ASSOCIATION FOR RENEWABLE ENERGY & CLEAN TECHNOLOGY

1. Welcome and Introduction
2. New Buildings Scotland Regulations Overview and Update
3. Scotland Heat in Buildings Consultation
   a) Overview
   b) ‘What does this mean for biomass?’
4. Questions
5. Suggested Response and Discussion
6. Case studies
7. Next steps/ timeline
8. Thanks

New Buildings in Scotland Overview

The Building (Scotland) Amendment Regulations 2023

- Banning of the installation of "Direct Emission Heating Systems" in domestic and non-domestic new builds as of April 2024 that ***"during normal operation produces more than a negligible level of greenhouse gas emissions at the point of production of that thermal energy"*.** The scope is for heating and hot water, so industrial processes will not be covered by this legislation.

- Building warrants in Scotland are valid for 3 years which means that those applied for ahead of the in-force date can build in accordance with current requirements.

- The only technology so far to be defined as fitting their definition of negligible is 100% hydrogen boilers.

- As it currently stands any bioenergy system will not be able to be installed in new buildings as of April 2024 – this does not cover alterations, extensions or existing buildings. Bioenergy could still be used within heat networks, process heat, in emergency back up and where it is not reasonably practicable to change the existing system within a conversion.

SCOTTISH STATUTORY INSTRUMENTS

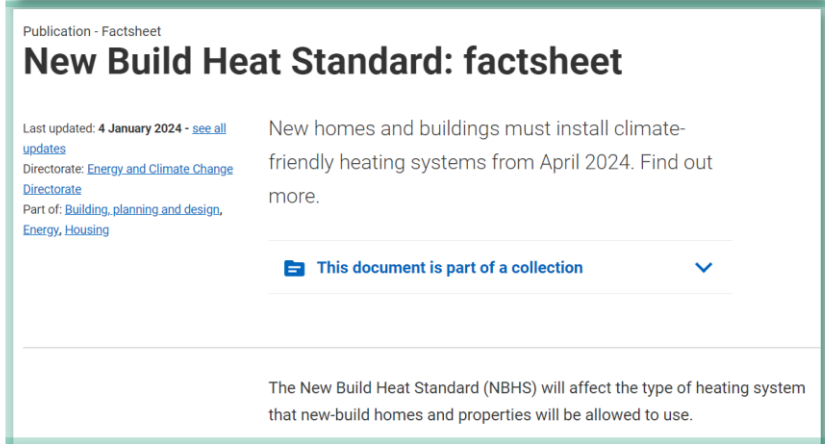
2023 No. 177

BUILDING AND BUILDINGS

The Building (Scotland) Amendment Regulations 2023

Made - - - -	*6th June 2023*
Laid before the Scottish Parliament	*8th June 2023*
Coming into force - -	*1st April 2024*

The Scottish Ministers make the following Regulations in exercise of the powers conferred by sections 1 and 54(2) and schedule 1 of the Building (Scotland) Act 2003(a), and all other powers enabling them to do so.



Publication - Factsheet

New Build Heat Standard: factsheet

Last updated: **4 January 2024** - see all updates

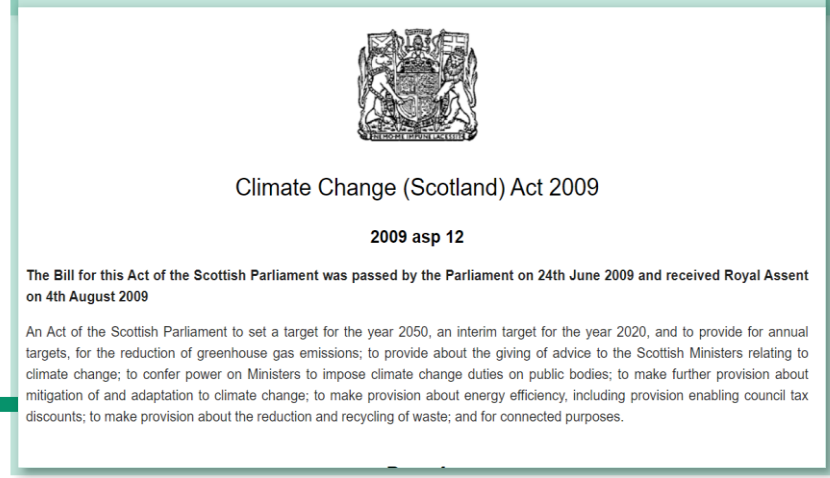
Directorate: Energy and Climate Change Directorate

Part of: Building, planning and design, Energy, Housing

New homes and buildings must install climate-friendly heating systems from April 2024. Find out more.

This document is part of a collection

The New Build Heat Standard (NBHS) will affect the type of heating system that new-build homes and properties will be allowed to use.



Climate Change (Scotland) Act 2009

2009 asp 12

The Bill for this Act of the Scottish Parliament was passed by the Parliament on 24th June 2009 and received Royal Assent on 4th August 2009

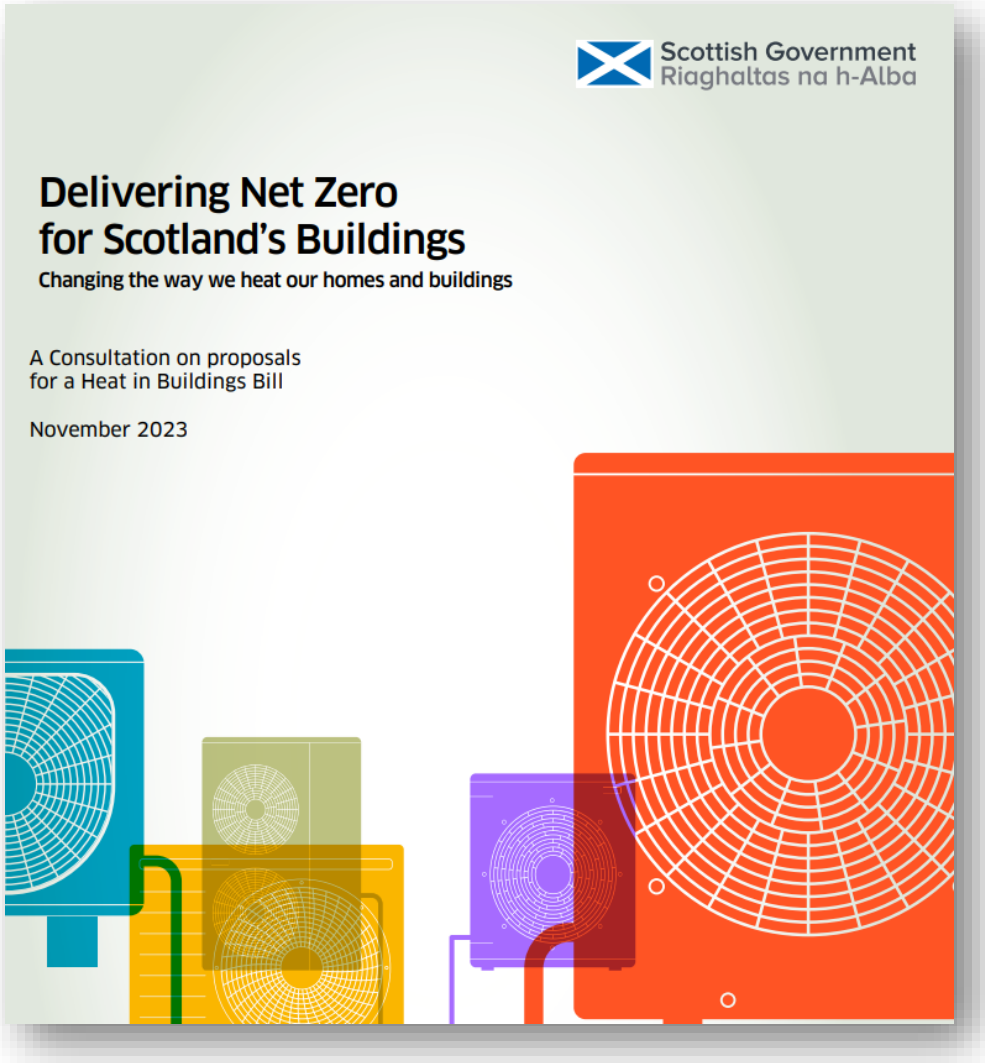
An Act of the Scottish Parliament to set a target for the year 2050, an interim target for the year 2020, and to provide for annual targets, for the reduction of greenhouse gas emissions; to provide about the giving of advice to the Scottish Ministers relating to climate change; to confer power on Ministers to impose climate change duties on public bodies; to make further provision about mitigation of and adaptation to climate change; to make provision about energy efficiency, including provision enabling council tax discounts; to make provision about the reduction and recycling of waste; and for connected purposes.

Consultation Overview

Scotland Heat in Buildings Bill Consultation

The consultation outlines proposals on new laws around the heating systems that can be used in existing homes or business premises. They plan to:

- Reconfirm that the use of polluting heating systems will be prohibited after 2045; and
- As a pathway to 2045, require those purchasing a home or business premises to end their use of polluting heating systems within a fixed period following completion of the sale.
- They also propose new laws on minimum energy efficiency standards for homeowners and private landlords.
- Propose new laws that will require people and businesses to end their use of polluting heating when a heat network becomes available.



What does this mean for Bioenergy?

- They include bioenergy systems (including biomass and bioliquids) within their definition of 'direct emission heating systems/ 'polluting heating systems', but they do recognise that there is a role for bioenergy in certain situations.

- Research linked in consultation:
  - Direct greenhouse gas emissions from low and zero carbon heating systems

- They intend to give extra time to the 2045 backstop to those already using bioenergy.
- Seeking views on how flexible an approach they should take with regards to bioenergy.

- Chapter 4: Heat Networks are treated differently – and "will be required to generate most of their heat from renewables or bioenergy by 2045".

- Chapter 5 – Exemptions and Extra time:

To ensure fairness, the Heat in Buildings Bill will:

Ahead of 2045, exempt those who can't, or perhaps should not have to, meet the Heat in Buildings Standard.

Provide extra time for those who need it to meet the Standard, or require that people comply with a modified version of the Standard which takes into account their building's characteristics or unique circumstances.

Make it easy for people to appeal where they feel the requirements are incorrect or unfair.

Overall Position on Bioenergy?

2.18 We recognise that as a renewable, and potentially net zero, energy source bioenergy may represent the best option to help decarbonise some homes for which clean heating systems are not suitable. We also want to ensure that owners who have taken the proactive step of installing renewable bioenergy systems are fairly treated. This is why, in addition to permitting extra time for those currently using bioenergy to meet the clean heat element of the Standard, we are seeking views on whether a more flexible approach to the use of bioenergy under future regulations is needed. We would need to balance this flexibility with the need to protect and ensure the supply of bioenergy in other sectors of the economy that also rely on bioenergy to remove emissions.

Questions – Chapter 2

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

8.

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

- ☐ **a.** No, it should be prohibited in all cases.
- ☐ **b.** Yes, it should be permitted for those buildings already using it.
- ☐ **c.** Yes, it should be permitted for those buildings who have no other clean heating system available.
- ☐ **d.** Yes, it should be permitted for those buildings already using it **and** for those buildings who have no other clean heating system available.
- ☐ **e.** Yes, it should be used in wider circumstances (please describe these).

Please include any additional comments below.

Questions – Chapter 5

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?

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

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

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

Overall Position on Energy Efficiency?

In order to improve the energy efficiency performance of Scotland's housing stock, we are proposing that a minimum energy efficiency standard – described in more detail on the following page – should be met:

- by private landlords before the end of 2028; and
- by owner occupiers (and owners of all other private homes) before the end of 2033.

But also recognise that these measures may not be relevant for some properties (e.g., those with solid walls), as well as traditional properties.

This is why we propose to set a minimum energy efficiency standard that can be met by installing a straightforward list of measures.

This list of measures would be developed to prioritise those that could have most impact for homes with the lowest amount of cost and disruption. **Any home owner who had installed these measures – or as many of them as are feasible for the type of home they live in – would be considered to have reached a good level of energy efficiency and meet the new standard.**

We think that this list could be[14]:

- 270 mm loft insulation;
- cavity wall insulation (CWI);
- draught-proofing;
- heating controls;
- 80 mm hot water cylinder insulation;
- Suspended floor insulation[15].

Questions – Chapter 2 – Energy Efficiency

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?

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

6. (see image)

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

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.
- ☐ **b.** 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), and they should be required to install all of these where feasible.
- ☐ **c.** 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 cost effective.
- ☐ **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.

Suggested Response and Discussion

High Level points include:

- Heat pumps not appropriate in every scenario – right technology for the right situation
- Reference UK's Biomass Strategy and need for alignment
- Biogenic carbon different to fossil carbon
- Particularly suitable for:
  - Off-gas-grid homes
  - Poor insulation or need for high heat load
  - Rural and island communities

Case studies

We aim include an annex of case studies showcasing the best of bioenergy in Scotland within our submission to the consultation on existing buildings.

We would value case studies for both retrofit and new build projects that demonstrate biomass as the most suitable solution.

Case studies should outline the following:

- Project name
- Domestic or non-domestic
- Project size
- Why bioenergy is the optimal technology in this situation?
- Potential carbon saved
- Any other benefits of the project?

Country House Hotel – Decarbonising historic building and driving estate woodland management

Project details: 200kW woodchip boiler

What heat is used for? Heat supply to country house hotel and nearby accommodation. All properties were previously heated by oil.

Why is biomass the optimal technology in this situation? As part of an estate with significant woodlands this provides a beneficial use for thinings and arboricultural residues. Alternative low carbon heating options such as heat pumps would not work in these historic buildings.

What are the estimated carbon savings? Approx. 120 tonnes/annum

Any other benefits of the project?: This has driven significant investment in woodland management creating local jobs and improving biodiversity within woodlands. Ultimately, higher quality timber, suitable for building etc, will be produced from the managed woodlands.

Describe how Government support has made this possible: Non-domestic RHI support made it economic to invest in the equipment.

Could the project lead to future innovations?: Central plant could easily be converted to alternative fuels if a better use for low quality timber is found.

❖ Previous Biomass Heat Case studies compiled by members of the REA WHF

Next steps/ Timeline

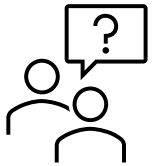
Consultation Response REA Draft: End of Jan/ beginning of Feb

Member Feedback: February

Member Feedback and case study submission deadline: 4th March

Consultation Deadline: 8th March 2024

- Roundtable discussion possibility
- Questions for civil servants



Thanks

THE ASSOCIATION FOR RENEWABLE ENERGY & CLEAN TECHNOLOGY

As always if you have any questions please get in touch:

All heat enquiries:
heat@r-e-a.net

Sara Bartle
Green Gas and Hydrogen Policy Lead
sbartle@r-e-a.net

Poppy Airey
Heat Policy Analyst
pairey@r-e-a.net

Mark Sommerfeld
Deputy Director of Policy
msommerfeld@r-e-a.net