

# Response ID ANON-G2CR-PZTQ-W

Submitted to **Heat in buildings strategy - achieving net zero emissions: consultation**

Submitted on **2021-04-30 16:36:19**

## 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:

We welcome the Scottish Government's commitment to setting out a long-term plan for achieving zero carbon heating in buildings. We agree that decarbonising the built environment will be a key part of achieving the 2030 and 2045 targets.

The pathway set out for achieving the interim 2030 target is ambitious and will require significant investment to ensure that Scotland's infrastructure can support the electrification of heat, as well as a rapid rise in the use of electric vehicles. This will require a step shift in action from both the public and private sectors in Scotland and must be handled in a way that ensures our built environment can continue to attract investment and remain competitive.

Without this necessary investment, there is concern that introducing new standards in the time frames proposed could make the proposals unworkable. This could lead to a knock-on impact on the supply of housing and commercial property in Scotland, and adversely affect the property market by introducing significant financial obligations on property owners (particularly those with older buildings).

On EPC's, we also agree that there is a need to reform the current system to take account of the changes in heating and the anomalies that can lead to more carbon intensive solutions being prioritised over low or zero carbon alternatives. In addition, without a robust way of measuring energy efficiency monitoring progress along the pathway will be difficult.

The current EPC rating system can, in certain circumstances, lead to inexact ratings or to recommendations that may improve an EPC rating but are likely to result in higher emissions. The automated energy improvement measures recommended by the Standard Assessment Procedure (SAP) must also be improved. The measures can be misleading and direct property owners to install energy efficiency measures that will provide poor return on the investment. Previous examples of this include installing renewable systems ahead of proposing fabric first enhancements. Our members have also found that for properties that use electric heaters, the SAP recommendation is to install wet central heating with gas boilers (where mains gas is available). This goes against recent policy proposals to move away from natural gas heating, both in terms of local air quality and the Strategy.

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

#### Please explain your view:

The commitment that by 2030 at least 20% of the volume of gas in the grid should be green raises important questions about the replacement of natural gas. If green gas was used to heat homes at a much greater scale in 2030, then this may disincentivise owners of properties with a mains gas connection to adapt their properties to use heat pumps. On the other hand, the use of hydrogen may help limit the impact of making modern and efficient gas boilers prematurely redundant, which will have financial benefits for property owners and limit the amount of embodied carbon created. It is therefore vital that the Scottish Government sets out its plan for hydrogen at the earliest opportunity to allow property owners to make long-term investment and development decisions.

A key challenge for the pathway is that it could see the removal of heating technology that is in good condition but is not currently a zero-carbon heat source. In such cases, it may not be in the owners' interests (or they may not have the ability) to switch to a zero-carbon alternative while they have an existing working set up. There must be greater thought on how the transition will work in this regard.

In addition, the cost of electricity is substantially higher than gas (in the region of 3-4 times) and this has to be considered in respect of fuel poverty for residential, and also the impact on small and medium business operations. While there may be a carbon saving for certain buildings, this may come at a significant financial cost to commercial and residential property owners' and therefore the framework must balance out both the risks and rewards.

On housing, the Scottish Government has previously estimated that the cost for all Scottish owner-occupied properties to reach an EPC rating of C is £6bn, with the average (mean) cost for each property estimated at £6,000 (Energy Efficient Scotland: consultation on further development of the programme, 2019). It is difficult to see how this level of investment will be able to be met by all owner-occupiers, and those in the most inefficient housing may be the least able to afford the level of work required. With regard to potential regulations, it also seems disproportionate and counter-productive to penalise/fine owner-occupiers for being unable to commit the capital needed to improve energy efficiency in their homes.

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

#### Please explain your view:

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

We generally agree with the assessment of strategic technologies set out in the consultation, with the caveat that more must be done to establish the role of hydrogen in reducing emissions from existing buildings. We welcome the commitment to further explore policy options for the non-domestic sector, taking into account the diversity of Scotland's commercial property stock and the need to maintain commercial viability.

On cooling, our members have noted concerns that Section 6 of the Technical Standards may promote carbon intensive developments – intensive both in terms of operational energy but also embodied carbon – at the expense of more efficient methods. For example, the current calculation is based on bettering a notional

building, and demonstrating compliance can, therefore, push a designer to employ an 'energy hungry' building as the starting point. Many non-domestic buildings are therefore designed with both mechanical ventilation and comfort cooling. With cooling likely to be an important consideration in light of climate change, we would like to see a move to more naturally ventilated spaces, which do not require comfort cooling.

We would also like the Scottish Government to consider permitting carbon offsetting and other means of achieving lower carbon rather than requiring a certain standard from every single building. This could be particularly useful in towns and city centres, where much of the building stock is of historic construction and where it would be difficult or unviable to bring such buildings to the level required to become net-zero.

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

**Please explain your view:**

It is important that any new heat target is ambitious, yet achievable, and that there is an adequate plan to support investment into the necessary infrastructure - and other measures - needed to decarbonise heat. We highlight several areas that need further consideration in this response.

#### **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:**

Scotland has a diverse business community and there are several key membership organisations that represent each sector of the economy, such as the Scottish Property Federation. Engagement with these organisations can allow access to many membership organisations at once, which could help with messaging and gathering feedback from key stakeholders.

#### **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:**

#### **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:

**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:

**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:

**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:

While not directly related to PDRs, ensuring that local authorities and Historic Environment Scotland have the resources to deal with modifications to improve energy efficiency and provide advice to property owners, will be key to a successful transition in listed buildings or heritage sites. Our largest cities are predominantly made up of older building stock with complex ownership arrangements and without local authorities and other public sector bodies having the resources to help implement change, then action could happen at a slower pace.

#### **Chapter 5: Preparing our Energy Networks**

**28 In your view, is there further action that can be taken to ensure that our electricity systems are ready for heat decarbonisation? If yes, please provide further information.**

Yes

**Please explain your view:**

Our members have raised significant concerns about the ability for electricity networks to meet the increased demands from the electrification of heat, let alone when this demand is combined with the added pressures from greater use of electric vehicles. It is our view that in many cases inadequate electricity network capacity will act as a barrier to developments being able to achieve the decarbonisation of heat.

To give an example of the scale of the potential issues, we are aware of a development that has recently received an upgraded electricity connection from its distribution network operator (DNO) to support the delivery of much needed new homes. However, despite this new connection, it is estimated that if the homes remaining to be built in the development were to use heat pumps, rather than the gas network as originally planned, then the potential demand could be four times more than the new electricity connection can provide.

Given the current difficulty in obtaining connections from DNOs, there is a fear that developers will simply not be in a position to meet the new standards. Elsewhere, our members have highlighted that the electrical infrastructure throughout Scotland, including in our major cities, is already incapable of delivering fossil fuel free developments. There are schemes currently underway that are stalling due to the capacity issues in the network, preventing them from implementing low and zero carbon heat. These issues need to be mitigated urgently to avoid introducing a barrier to new zero carbon heat developments.

**29 What are your views on the changes set out above for the electricity networks and are there further actions by government, the regulator or industry that would make these more cost effective? Please provide evidence to support any suggestions.**

**Please explain your view:**

The Scottish Government should commission research into the ability for networks to adapt to the new load that the decarbonisation of heat would have and make clear recommendations on steps that need to be taken to address potential barriers. The Scottish Government should also seek an agreement with the UK Government distribution network operators and regulators, to ensure that the energy industry is enabled to increase capacity in the electricity network when needed, and at speed.

The key issue is in recognising that the Strategy in its current form and timescale could lead to a limiting of electricity connections, which inevitably will damage housing and commercial building supply, and potentially lead to price increases in housing, energy infrastructure and utility prices.

There must be substantial additional funding available, possibly through subsidy, if the cost for enhancing the network is not to fall on the eventual occupier of the property (particularly through their energy bills) or make new development in certain parts of Scotland unviable. Current expectations of up-front investment from developers will not be sufficient to address the challenge of forward funding infrastructure or pursuing the Scottish Government's 'infrastructure first' policy. Typically, contribution costs for Primary Substations are in the region of £100,000 per MW and due to these changes, there could be an impact on the viability of development.

Any investment in the electricity network ahead of the 2030 targets, will have a lasting and important impact on Scotland being able to achieve net zero by 2045, as it is clear that the net zero future of Scotland is linked to the electrification of our economy. It is therefore vital that significant investment to increasing capacity is made commensurate to the scale of the challenge at hand.

Another potential solution to address this challenge could be the creation of a national infrastructure agency tasked with ensuring essential infrastructure, such as enhanced energy networks, are delivered at scale and pace. There are currently a number of different agencies and government funds that are available to help the transition to net zero, and an overarching body could help to pull these different stands together to deliver the infrastructure needed to support the Heat in Buildings Strategy.

Additional consideration must also be given to the interaction with the utility companies responsible for our energy networks and those that use that energy or need to connect into the grid. Our members report that engagement with utility companies is unacceptably slow and they are also of the view that that current engagement with utility companies is not open and transparent. Getting legal documentation in place for agreed connections can be problematic and create unacceptable delays to the commissioning and occupation of completed real estate property (notably in new housing delivery).

Our members have suggested that utility companies could be encouraged to align their strategic planning and budgets with the Heat in Buildings Strategy. Utility companies are private businesses or international organisations and have no statutory requirement to contribute to allowing new connections for upgrades needed for net zero heating. Nearly all utility providers are obliged via statute to make supplies available on a first come/first served basis.

During early engagement, developers are usually interested in utility capacities and being private companies, or PLCs, utility companies are not obliged to divulge such information. They do, however, confirm whether their system can supply a development via a Point of Connection (POC) request. The response to the POC will invariably identify additional costs, upgrades etc.

Our members report that on some occasions, they have had to pay the utility companies to carry out a survey of the capacity of their own networks. Despite pre-agreeing quotes for work, utility companies have on occasion written to advise members that the cost of carrying out the works has exceeded the utility companies' budget and have sought payment of these additional costs.

There have also been some instances where members have welcomed the opportunity to secure rebates on pre-agreed costs incurred as the new customers come "on stream" but this is not always the situation and developers/investors are still faced with having to cashflow the original capital cost of the works. This may be one area where the Scottish National Investment Bank could assist, as well as the utility companies sharing an element of upfront risk.

As many of the measures contained within this Strategy rely on increasing the use of electricity, it will be vital that the Scottish Government explores how it can respond to increases in demand and work with utilities to remove barriers to getting new connections. Transparency from utilities on capacity in each location and exploration of a statutory duty to support the delivery of the decarbonisation of heat as detailed in the Strategy could also be helpful.

**30 In your view, what changes are needed to ensure that those least able to pay, including those in fuel poverty, are not unfairly impacted by the transition in our electricity and gas networks?"**

**Please explain your view:**

In respect of new builds, when combined with the fabric improvements that are being proposed in the current review of Section 6, giving developers the flexibility to comply with net zero heating standards in the most appropriate way to the development will help to create cost efficiency for consumers.

The market is responsive to operating costs and it is there for in the interests of developers to keep such costs down. However, at a more fundamental level the cost of electricity or heat provided by heat networks is out-with developer and consumer control. The government would be best placed to mitigate any potential costs consumers may face as a result of any new regulations through the energy markets.

In existing properties, the balance between achieving net zero heat and it being affordable for consumers is more finely balanced. Retrofits therefore could end with the consumer paying more than they would have if using gas, particularly if the efficiency of the building is poor.

Funding should be available to those who are vulnerable or in fuel poverty, but it is important that there is also funding for other groups of people that will be impacted by these regulations. There will be many groups that could find funding energy efficiency improvements difficult - owning a property has very little relation to the disposable income of that household/business or of their particular financial circumstances at the time. Alternatively, support can be provided through the tax system, such as with a discount in council tax or other fiscal incentives.

As highlighted above, expectations of up-front investment from developers will not be sufficient to address the challenge of forward funding infrastructure or pursuing the Scottish Government's 'infrastructure first' policy. Typically, contribution costs for Primary Substations are in the region of £100,000 per MW and due to these changes, there could be an impact on the viability of development.

**31 What are your views on the changes set out above for the gas networks?**

**Please explain your view:**

The question over the role of hydrogen may be fundamental to the decarbonisation of heat, given that the vast majority of the existing housing stock in Scotland is connected to the gas grid. Economies of scale mean that hydrogen may only work if there is a base load to make it economically viable, therefore a decision must be made soon before homes are encouraged to switch from gas to heat pumps. For the property industry, certainty is key, as it can take many years to plan and develop a site and knowing what heat source will be used is a key decision that must be taken early in the process.

**32 Are there further actions by government or industry that you think would make the changes set out more cost effective? Please provide evidence to support any suggestions.**

**Please explain your view:**

**33 What evidence can you provide on the potential for heat networks in Scotland that can help inform a new ambition for deployment within the final Heat in Buildings Strategy?**

**Please explain your view:**

Heat networks will be an important element in the decarbonisation of heat in new homes, particularly in areas within the immediate locale of an existing network. However, our position remains that developers should be afforded flexibility to decide on what the best zero carbon heat solution is for each project. We would therefore caution against a blanket compulsion to connect to a heat network within certain zones.

It should be borne in mind that there may be cases when district heating is unlikely to deliver real benefits through the poor efficiencies of distribution. In addition, other technologies, such as heat pumps, may offer better 'upstream' emission reductions than a connection to a heat network that is powered by gas.

We are also concerned about the potential time lag between the intended completion date of the building/development and the eventual connection to the heat network. In circumstances where a connection to a heat network would take additional time, it is conceivable that a property would be required to have a heat pump installed initially, only for it to then be connected to a heat network at a later date. This would not only be inefficient and costly, but there would be an embodied carbon cost resulting from the duplication in heat technologies.

A delay to being able to connect into a district heat network could also have cost and time implications for a development. This could occur if there is a constraint on getting the necessary infrastructure to the development or if there is a capacity restriction. Our members have previously noted delays in connecting to heat networks as a result of significant hold-ups in getting approval to expand the network from agencies such as Network Rail. It may also be more cost effective for a developer (or building owner/ tenant/ occupier) in terms of both installation and running costs to heat a building other than using a heat network.

Some of our members have expressed a view that it should not be the role of development in Scotland (nor the eventual occupiers of such properties) to create the base load for a private heat network company to establish a monopoly. Of course, it may be the case that many developments do decide to connect to existing heat networks; however, there is still concern about the lack of choice for the consumer.

**34 What evidence can you provide on the potential for heat derived from energy from waste to qualify as low or zero emissions?**

Please explain your view:

**35 What views do you have on mechanisms to support this and the use of wider sources of waste heat?**

Please explain your view:

**36 With the sustainable market for heat networks described above in place by the early-2020s, are there any further gaps that must be filled to support subsequent delivery of heat networks? If so, what are these and are there particular types of organisation that would be key in filling these?**

Not Answered

Please explain your view:

## **Chapter 6: Kick-starting investment in the transition**

**37 What are your views on the range of actions identified above to kick start the investment in the transition over the next 5 years?**

Please explain your view:

**38 Do you agree with the strategic funding priorities we have set out?**

Yes

Please explain your view:

We agree with the strategic funding priorities, but we have doubts as to whether the funding of £1.6bn over the next 5 years will be adequate to deliver these priorities across Scotland, and at the scale needed. We view Priority 2 (investing in strategic technologies in low or no regrets areas) as fundamental to laying the groundwork for achieving the ambitious 2030 targets. However, considering the size of the task at hand, such as the need to grow capacity in the grid and delivering other enabling infrastructure, we believe that more investment may be necessary to kickstart the fundamental changes needed in the way we heat our buildings.

On the need to pay, in addition to offering SMEs a debt facility, there may be a case to expand support through the tax system. The business rates system or land and buildings transaction tax could be used to incentivise retrofit by offering discounts to efficient or significantly improved properties.

Currently, the business rates system can disincentivise investment to increase the energy efficiency of a building or to introduce new more efficient zero carbon heat systems. This is because such actions can increase the rateable value of the building and make the owner or tenant liable for higher business rates. It is therefore important that the Scottish Government reviews its business rates system to ensure that the tax does not inhibit private investment into Scotland's commercial building stock and instead incentivises investment by potentially offering a discount to offset the capital required to make the necessary improvements.

One further fiscal measure that the Scottish Government could implement to help kickstart investment into commercial building stock is a reduction or removal of punitive empty property rates charges. The charge deters much needed investment into older properties particularly in town and city centres by taking capital away from what are already distressed assets. Much like the Business Growth Accelerator, the Scottish Government should look at a way of removing the empty rates burden from owners and tenants that make improvements to their buildings. This will not only help to improve the carbon footprint of our high streets, but also create better town and city centre locations.

**39 In your view, should equal funding be allocated across these priorities or should certain priorities be weighted in terms of impact for Scotland?**

Please explain your view:

The Scottish Government should direct its funding to where there will be greatest affect, while ensuring that any energy efficiency improvements remain financially viable for companies and homeowners. It does not seem necessary for there to be equal division of the limited funding available.

**40 What are the opportunities and challenges we face in maximising our £1.6 billion investment?**

Please explain your view:

Administration of the funds could open an opportunity for the creation of a national infrastructure agency tasked with pulling the different stakeholders from the public sector organisations, key agencies and utilities together. Not only would this help create more holistic solutions to delivering zero carbon heating, but the agency could also be a vehicle for delivering other priorities needed for meeting our climate change targets. Such opportunities include the development of infrastructure needed for the greater use of electric vehicles and other low carbon forms of mass transit.

**41 What are your views on the role of government funding over the next five years? For example, should it be focused towards significant increases in the volume of renewable heat and energy efficiency measures installed or more targeted at specific priority groups or technologies?**

Please explain your view:

There are many important areas for funding, but it is important that any financial support is not limited to a couple of projects. Instead, the focus should be on ensuring the infrastructure is available for the widespread use of heat pumps, electric vehicles and potentially hydrogen gas. Only by laying this foundation will we be able to achieve the decarbonisation of heat across as set out in this Strategy.

Any investment in the electricity network ahead of the 2030 targets, will have a lasting and important impact on Scotland being able to achieve net zero by 2045, as it is clear that the net zero future of Scotland is linked to the electrification of our economy. It is therefore vital that significant investment to increasing capacity is made commensurate to the scale of the challenge at hand.

#### **42 What are your views on how we can use our funding to leverage and encourage private sector and other forms of investment?**

**Please explain your view:**

As mentioned above, the business rates system or land and buildings transaction tax could be used to incentivise retrofit by offering discounts to efficient or significantly improved properties.

Currently, the business rates system can disincentivise investment to increase the energy efficiency of a building or to introduce new more efficient zero carbon heat systems. This is because such actions can increase the rateable value of the building and make the owner or tenant liable for higher business rates. It is therefore important that the Scottish Government reviews its business rates system to ensure that the tax does not inhibit private investment into Scotland's commercial building stock and instead incentivises action by potentially offering a discount in business rates to offset the capital required to make the necessary improvements.

A further fiscal measure that the Scottish Government could implement to help kickstart investment into commercial building stock is a reduction or removal of punitive empty property rates charges. The charge deters much needed investment into older properties particularly in town and city centres by taking capital away from what are already distressed assets. Much like the Business Growth Accelerator, the Scottish Government should look at a way of removing the empty rates burden from owners and tenants that make improvements to their buildings. This will not only help to improve the carbon footprint of our high streets, but also create better town and city centre locations.

#### **43 What are your views on the effectiveness of our existing delivery programmes in supporting different client journeys, including for those in or at risk of fuel poverty? (for example, landlords, home owners, non-domestic building owners – public and private, domestic and non-domestic tenants). In your opinion, are there any gaps in support?**

**Please explain your view:**

#### **44 Is there any action we can take to further tailor our support to meet the ambitions set out in this strategy, including in relation to fuel poverty? (Please include any evidence you may have to show what this might achieve).**

**Please explain your view:**

### **Chapter 9: The Economic Opportunity**

#### **52 What are your views on the plans set out to maximise the economic benefits to Scotland from the heat transition?**

**Please explain your view:**

#### **53 What role could technology-specific milestones play in supporting supply chain development, and how should these milestone levels be developed?**

**Please explain your view:**

#### **54 Is there anything further that can be done to ensure that Scotland realises the economic opportunity available from the heat transition?**

**Please explain your view:**

#### **55 What more can be done to support the development of sustainable, high quality and local jobs in the heat and energy efficiency supply chain across the breadth of Scotland?**

**Please explain your view:**

#### **56 In your view, what are the opportunities and constraints presented by the role of the wider public sector in maximising the economic benefits to Scotland?**

**Please explain your view:**

#### **57 In recognition of the skills consultation, published alongside this strategy, what further action can be taken to support skills development in Scotland over the lifetime of this strategy?**

**Please explain your view:**

**58 Are you aware of any barriers to the reskilling of existing oil and gas heating engineers to equip them to install low and zero emission heating?**

**Please explain your view:**

**59 How can we support the development of more opportunities for young people?**

**Please explain your view:**

## **Chapter 10: Working with the UK Government**

**60 To what extent do you agree that the issues identified must be addressed jointly by the UK and Scottish governments to unlock delivery in Scotland?**

**Please explain your view:**

The SPF is particularly concerned about the capacity of energy grids and our members would like certainty on what heat sources they will be able to use for projects that may take many years to complete (such as large-scale housing or commercial developments). Given that heat and energy standards are set by the Scottish Government, and while energy supply is largely a reserved issue, we would like to see greater collaboration to ensure that the infrastructure is in place for the widespread use of net zero heat in Scotland. In terms of regulation of energy networks, there should also be cooperation between the Scottish and UK governments to push for greater transparency from utilities on capacity and an exploration of a statutory duty to support the delivery of the decarbonisation of heat as detailed in the strategy.

**61 Are there any further areas where joint action is required? For example, to ensure no one is left behind in the transition and fuel poverty is addressed.**

**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:**

**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:**

## **About you**

**What is your name?**

**Name:**

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

Organisation

**What is your organisation?**

**Organisation:**

Scottish Property Federation

**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