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Submitted to Proposals for a Heat in Buildings Bill: Consultation

1. The Heat in Buildings Standard - covering heating and energy efficiency

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:

We agree with the ambition of this timeline for decarbonising heating systems in all buildings by 2045, although we have significant reservations on industry capacity to deliver the targets. We strongly feel the interim timelines of 2028 and 2033 are not in line with the technology, skills and manpower to adapt to these changes. It is not financially or technically viable to decarbonise all the whole domestic stock by 2033 without putting mechanisms and guidance in place. The SPF's view is that we agree absolutely with the ambitions outlined in the decarbonisation timescales, and we simply must make tangible and significant progress towards these goals. We cannot avoid the critical issues we raise and relate to in answer to this and other questions, and we will continue to challenge policy proposals where we feel they are impractical or potentially counter-productive. But we accept the wider purpose of the Heat in Buildings Bill consultation that we absolutely must begin to make significant progress towards our decarbonisation goals.

There is a lack of focus on the supply chain and whether it has the capacity to build and deploy all the assets we need to achieve the targets. The gap in the supply chain also causes uncertainty for building owners and investors on how to comply with these changes. We believe there should be further consideration of transitional approaches, for example the use of low carbon gases as a transitional measure. Our members have also highlighted it is also important that the Scottish Government do not inadvertently encourage a rush on, or exacerbate the use of, refrigerants which have high Global Warming Potential ratings, as with hundreds of thousands of heat pumps installed there will be a proliferation in refrigerant gas use / needs. We would encourage the Government to give consideration to this aspect of the move to clean fuels, alongside trajectories for F-Gas regulations and phase outs.

There is not enough information on the non-domestic sector, which may find it impossible to deliver these targets. The relationship between landlord and tenant and the legally binding obligations and responsibilities contained in commercial leases have not been acknowledged and must be reflected in emerging policies. There are significant issues of valuation which can affect the capital available to undertake works, practical challenges to obtaining vacant possession of a building in order to carry out essential NZC works and some negative business rates aspects which combined can disincentivise landlords to take forward decarbonisation measures. These cannot be ignored if we are to make progress in the non-domestic sector. The government also needs to incorporate an understanding of coolant requirements in buildings and the impact this may have on energy and related carbon emissions.

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:

We broadly agree MEES is one of a series of measures that are a good way to drive the improvement needed for our building stock but the timeline for PRS landlords is too stringent as the nature of Scottish tenancies is open ended. A landlord cannot necessarily carry out these improvements whilst there are tenants in occupation and the landlord has no way of knowing when the flat will become vacant. In addition to that, private rented sector tenancies can be complicated in terms of multi-occupied flat, different tenure types in a tenement building (with some flats being owned and others rented owner/rented etc) where fabric upgrade or heating system upgrade cannot be carried out in isolation. The disruption to occupiers, financial implications, technical skill gap and viability of effecting these changes are not accounted for in the proposals. There appears to be no understanding of where responsibility for compliance with statute sits in a typical lease.

The MEES for the domestic sector does set out a list of changes that can be carried out by the landlord but there is not much guidance on how to approach these upgrades. For instance, multi-occupant flats might not have enough space to fit air sourced heat pumps or the cavity wall insulation which is suggested can cause dampness and even black mould as it may trap moisture. In addition to these challenges, the upgrades are expensive to carry out and there should be tax benefits, grants, subsidies or green mortgages available to incentivise the push to net zero. There are practical challenges around finding alternate accommodation for tenants in bringing forward these upgrades.

Most of the rented stock is older buildings which pose a major feasibility challenge where retrofitting pre-1919 tenements will require more investment in maintenance and operation. A 'one size fit all' approach cannot be used here, there is also no consideration of embodied carbon in the proposal.

Our further comments below explain that how the energy performance of buildings is calculated is hugely important and EPCs may not be the best way to assess compliance with the new legislation.

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 oppose

Please include any additional comments below:

We agree with the need and ambition of MEES and for all domestic buildings to be decarbonised by 2033 but we think there should be more guidance and assistance provided to achieve the standards. In short, we would like to support the target of 2033 for decarbonisation of the domestic stock, but we cannot see that it is achievable at this stage and moreover, our members have reported concerns that it may even be counterproductive to the aim of reducing carbon emission if considered holistically. Tenements and older buildings have various challenges as stated in the previous answer. The cost to decarbonise all the households in Scotland is estimated to be £23.5bn-£26bn by 2030 (Affordable Warmth report, WWF Scotland, 2023) and the current support from Scottish Government has only a budget £1.8bn for this Parliamentary term that is also for all buildings including non-domestic. The huge financial gap cannot be expected to be covered by homeowners and private sector. There is also no incentive to bring about these changes especially the move away from gas boilers when the unit price for electricity is not on a par with gas.

There are also households suffering fuel poverty, owners of tenements and older stock for whom

bringing about these upgrades is not straightforward. By enforcing these changes by a backstop of 2033 the owners of this type of property may find themselves unable to sell the property and not able to move unless they can finance an upgrade. This could have a detrimental impact on the availability of properties for sale or rent.

We strongly believe to bring forward these changes at a country wide scale, there has to be more public awareness and more guidance provided.

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?

Neither support nor oppose

Please include any additional comments below:

We broadly agree there should be a straightforward set of measures which should ideally align with the reformed EPC fabric efficiency metric, but this should not essentially translate to increased insulation as there will be long-term climate and structural impacts on the building. Healthy ventilation should be accounted for as well, avoiding internal humidity and chances of moulds growing. The straightforward list of measures attempts to deal with an unanced issue with a limited set of solutions. Whilst fabric first is important, setting a number of measures is a poor way of encouraging higher energy efficiency and this, our members believe, could lead to loopholes being inadvertently created.

Our members also highlight that MEES should be set up fairly. There will need to be exemptions for some properties due to unsuitability e.g. listed or older properties and some members have suggested that an alternative building efficiency measuring tool like BRE AAM or NABERS by BRE Group may be better. The Government also need to consider the embodied carbon in buildings. The differences between dwellings and non-domestic property should also be closely considered as there are substantial differences. Having a non-exhaustive series of measures to help those who may be less informed to understand what may be applicable for them / set a positive direction of travel could be a middle ground, but there should still be building specific reviews undertaken for dwellings and such reviews must be taken for non-domestic buildings.

There is a huge data gap and the government should improve its evidence base for baseline information on fuel poverty and energy demand from buildings in order to feed into policies like Heat Networks, Heat in Buildings and EPC reform.

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

Neither support nor oppose

Please include any additional comments below:

As stated in previous answers, the list of measures provided is not enough/ relevant to meet the energy efficiency standards. Members have commented that the list of measures does not allow for the innovation the industry requires. There are some fundamental practicalities that need to be worked through. Some of which (e.g. traditional buildings) are discussed later within the proposals. A greater degree of collaboration between Historic Environment Scotland, Planning Departments and Building Standards will need to take place to allow some of the improvements to be applied in a greater number and scale of buildings. The points in the previous questions discuss there being a challenge with a one size fits all. There needs to be wider consideration of how it fits into lifecycle replacement (both fabric and systems). It is impractical to have a feasibility study done on every

individual domestic property (skills, knowledge, time and cost!), but could there be a consideration around a series of case studies to show what is possible in different class and age of asset, as well as systems.

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?

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

Please include any additional comments below:

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

Yes

Please include any additional comments below:

The list of measures only suggests additional fabric improvements without a consideration of embodied carbon or emissions. There should be an alternate list of measures to be adopted which will measure the impact as well as operational energy use. There should be support provided for alternative heating systems like CHP, large thermal stores that households can connect to, photovoltaic energy where suitable. Energy use intensity (EUI) is going to be increasingly relevant as we all switch to all-electric/ electric/ hydrogen-based power and heating. There should be greater emphasis placed on actual / in-use, not just modelled theoretical values, with energy intensity monitored and improvements made based on actual values. EUI is also generally something easily measured and monitored (accepting that granularity of sub-metering may not always be available, but building wide should be).

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 Please include

any additional comments below:

We recognise bioenergy used on large scale is not considered to be sustainable. It is constrained by the radius of source to provide the fuel and since the government encouraged use in schools etc it should be allowed to run its course till redundant. Individual circumstances need to be understood, recognised and accommodated. For home heating, bioenergy is not recommended in the modelling by UK Climate Change Committee where its use in heating should be minimised and should carefully be used if emissions are comparatively lower.

2. Property Purchases

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:

Enforcing the removal of polluting heating system directly following a property purchase raises considerable practical, affordability, equality and legal concerns which we feel some have not been adequately addressed in the guidance.

Practical challenges include how new heating systems are installed if the property is occupied. This is a particular concern for the commercial and private rented sectors where the configuration of a property may make the installation of a new heating system impossible without vacant repossession. The proposed grace periods would be particularly challenging to achieve for properties that are purchased with existing sitting tenants, raising the practical question of where to temporarily relocate tenants and the costs of doing so. There may also be circumstances where certain lease agreements may mean landlords may find it difficult to justify interventions as it could disrupt potential customers. Technically, we are concerned that Scotland does not have the skills and resourcing capacity to deal with a sudden and large influx of required work.

It is also overlooked that the need to undertake works will follow a trigger event (such as a sale), there may be an immediate and negative impact on values immediately following introduction of new legislation, reflecting the contingent liability to meet the cost of such works. In multi-let buildings, the landlord may need to wait until all leases fall-in to allow access to carry out works. Purchasers are unlikely to have sufficient information or access to allow an accurate assessment of the cost of works they will require to undertake prior to making an offer. Another unintentional consequence can be the rating system will create a perverse situation for occupiers. We know that higher rents are being paid for best in class zero-carbon buildings. These higher rents will drive higher rateable values which will effectively penalise occupiers who are “good corporate citizens” in the commercial sector.

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?

Yes – the grace period

should be five years

Please include any

additional comments

below:

We welcome the proposals to introduce a ‘grace-period’ to give property owners sufficient time to make informed decisions and to transition. A grace period requiring a minimum of five years to transition may be suitable for some buildings however we would urge the government to be flexible with properties that require more complex works. Factors such as limited skills and technology particularly for rural properties, tenement flats and for some commercial buildings may necessitate extra time

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?

Strongly support

Please include any additional comments below:

We believe a cost-cap is necessary to protect property owners who may require significantly more complex work once acquiring a new property. We would urge that the type of cap used is nuanced accounting for example for historic / heritage assets. We welcome the Bill’s distinction in types of the caps offered between the non-domestic and domestic sectors.

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

Another.

If another, please suggest below

We appreciate the difficulty in devising a cost-cap method that can account for different property types. We do not think the proposed cost-caps are nuanced enough to accommodate different property types / conditions. If possible, the cap should be calculated on a tiered basis where the property size, type, age, energy efficiency rating are all considered to produce a cap cost that recognises the building's individual circumstances as best as possible. The approach should also differ depending on the sector. To ensure transparency, the cost cap could be integrated within the home report, so buyers are aware of the cost cap prior to the property purchase.

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?

Somewhat oppose

Please include any additional comments below:

Where possible, it is important to create a stable legislative environment for all current and prospective building owners, investors and developers to ensure they can make informed decisions and account for changes in the long term. An unpredictable policy environment can disrupt long-term planning thus affecting development and investment opportunities. This is particularly the case for institutional investors who require certainty before committing to large scale and long-term investments. Introducing potential legislative change down the line could seriously impact on investor sentiment. For example, the ongoing uncertainty surrounding the details within the anticipated Housing Bill has already put at risk significant residential investment in Scotland, estimated by experts to be potentially £2.5bn at this stage.

To be clear, while investors will strive to achieve the highest sustainability credentials, they require a regulatory environment that is predictable and sensible to plan and adapt, otherwise we risk funding being diverted away from Scotland.

3. Connecting to Heat Networks

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 oppose

Please include any additional comments below:

We recognise that there may well need to be a compulsory approach to heat network connections at some stage. here is little understanding of the commercial implications of the proposed approach. Heat networks are in their infancy and this would lead to some short-term decisions that do not deliver desired outcomes. (e.g. not all DHNs are equal, in terms of carbon or costs). It is critical that owners and occupiers of affected buildings are supported in the transition from traditional heating systems to heat networks as they come online. This will be important to prepare owner/occupiers for the transition and to ensure the reliability and sustainability of the heat network system that is installed in their location. It will also be important to provide reassurance on the financial

sustainability and cost of the Heat Network in operation in an area for the residents, public sector bodies, businesses and other owner occupiers (charities for example) that will be affected. This heat network should also be non-polluting if people are strongly encouraged to join it. Fossil fuel-based heat networks should be removed quickly and discouraged in the meantime, with network operators required to provide a decarbonisation feasibility / strategy within a set period of time

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?

Neither support nor oppose

Please include any additional comments below:

Developers will need the certainty of reliable connections and operation of a heat network before being able to fully commit to their development. This could be a 5 to 25 year outlook for major development programmes. A key challenge will be not just be the capacity and indeed pace of rollout out of operational heat networks, but the resources and ability to deliver heat networks on time for developments to be brought forward. Developers of either commercial or residential buildings will also have a significant challenge of explaining the heat network system to potential owners and occupiers, who hitherto will have been used to the self-contained heating approach. Commercial buildings more often than not require a cooling network loop. This can be easily achieved by installing a Heat-Pump Chiller, a unit which provides simultaneous heating and cooling. If such a Commercial building were forced to connect to a heat network, the developer would still have to procure a chiller. A heat-pump chiller can reclaim waste heat from the cooling loop and as such can provide a better, more sustainable solution than a standalone heat network + building specific chiller. As such, Commercial buildings requiring cooling may not be best served by a heat network. This is a fundamentally important point that needs to be accepted.

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?

Neither support nor oppose

Please include any additional comments below:

We believe any such proposal must be implemented with a view to making it as easy as possible for non-domestic owner occupiers to comply with any requirement for reporting unused heat production. We do fear that the costs potentially required to comply with this proposal may outweigh the potential benefits. There is also no consideration of energy usage for cooling which is more likely to be required for non-domestic property.

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

Somewhat support

Please include any additional comments below:

Again, we recognise the positive merits of this proposal in principle but our key concern would be that the process and operation of requiring buildings to provide unused heat to local heat networks is simple, economic and effective. Also, there is a big question about who would be on financing of the works. And there a multitude of further questions - how, in practical terms, will a building 'provide heat' to a local network? (e.g. when would it happen, who pays for the infrastructure, how is it measured, does it have a value? etc.)

This requirement would ultimately form micro-grids for heat with lots of exchanges. In turn the Metering and management associated with these exchanges would need attention. Systems such as Blockchain trading could be useful to support this. Mandates on flow and return temperatures would need to be set

4. Monitoring and Enforcement

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?

A combination of the two

Please include any additional comments below:

We agree with the principle of monitoring progress towards meeting the targets and would suggest a combination of both proposed options would be an effective approach. Our members have also suggested that there should be a specific 'heat in buildings standard' document produced at point of sale, lease or refurbishment that details the actions that have been taken in order to meet the standard. It should be a concise and publicly open document that is similar to the EPC register.

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 any form

of enforcement Please

include any additional

comments below:

We urge the government to avoid enforcement measures which invoke financial penalties. There also needs to be careful consideration of how this could impact on the wider property market and valuations particularly if conditions of mortgages or insurances are tied to energy efficiency ratings. For example, there could be higher upfront mortgage costs which could then affect lending criteria to prospective buyers, potentially excluding some from home ownership or trapping them into homes that may not be fit for their use. There is also a risk that a two-tier market could develop where mortgages for properties that have the highest energy efficiency ratings are only easily obtained, potentially having the effect of reducing property values for older homes. Moreover, it is not clear to what extent this could impact the Scottish market on the UK, so we suggest having policy continuity with UK as much as possible. As a result, we would advise against issuing this responsibility onto lenders.

We would also strongly oppose increasing non-domestic rates particularly at a time when relief for empty properties and listed buildings has been cut or removed all together. Many historic buildings require a complex approach to energy efficiency upgrades so the potential for additional charges could be seen as a disincentive to prospective property owners who have the means to restore these buildings.

We would instead support an approach where property owners are incentivised to make energy efficiency upgrades in return for council tax reduction or tax reliefs which add cash immediately to homeowners' pockets. As advocated previously, equalising or even better, reducing the unit cost of electricity compared with gas may encourage property owners to upgrade more quickly.

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:

We strongly support the proposal to exempt certain people from meeting the standard to balance affordability, practicality and fairness but would caveat this with the need to ensure that the standard is not easily bypassed otherwise it risks undermining efforts to transition. It is important to consider the circumstances of those in low-income houses or those who are retired and may not have anticipated the costs of retrofit. There may also be instances where individuals unexpectedly become property owners through inheritance and so may require some leniency or temporary exemptions particularly if the property needs extensive work. In summary, we believe there should be a further consultation on the criteria for exemption.

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:

We strongly support owners including the public sector with listed or historic buildings to have a modified standard as it may not be practically possible to achieve the stringent standards. Buildings located in rural and island areas must also be considered as the practicality and affordability of meeting the standard may also be unachievable. For instance, many rural houses rely on oil heating and the current options to replace this are limited and not necessarily affordable. Older homes may also not be suited to the high insulation requirements expected in newer homes as they require certain ventilation levels to 'breathe' which is at risk of being reduced if the proposed standard is followed. Tenement flats are similarly difficult to retrofit and connect to heat networks. We welcome the government's research to look at tenement flats more specifically and would advise that these buildings are also considered for a modified standard. There may also be public sector buildings such as schools and NHS estates that will struggle to follow the proposed standard both practically and cost-wise.

We believe there needs to have an element of best endeavours incorporated into the approach here, as there will be things that simply cannot be done to the likes of historic buildings. That said, there are improvements that certainly can and should be undertaken. There has been a lot of debate about exemptions in the work members have been involved in with respect to the NZC Building Standard, with a near zero exemption for new build, but some (limited) concessions for existing buildings (mostly heritage/historic). This should act as a starting point to support a practical but determined step towards our net zero ambitions for the wider built environment.

The Heat in Buildings Bill must understand and recognise the distinctive legal obligations between commercial landlords and tenants for non-domestic properties. There is also little realisation of the role cooling systems will play in the non-domestic stock in particular. Other practical challenges will include the need for landlords to secure vacant possession should works be significant – where a landlord owns a multi-let building to various businesses this could take considerable time to achieve and will impact the ability of the property company to achieve NZC standards at the right time. There may also be wider commercial factors including an impact on property values which in turn may inhibit the ability of investors or owners to derive the capital needed to make material changes on a significant scale to their building(s).

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

Somewhat support

Please include any additional comments below:

There may be certain circumstances where owners may need extra time similar to those outlined above who might require a modified standard. But the eligibility criteria should be limited and means tested to ensure the standard is not easily bypassed.

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

Please include any additional comments below:

Those who we previously suggested that could be eligible for a modified standard may be instead suited to extra time to meet the standard such as historic and some public sector buildings, low-income households, rural and island buildings etc. More complex buildings such as hospitals and older buildings may benefit from extra time to account for technological advancements which may improve over time and thus increase the variety of options available for retrofit. Moreover, buildings located rural and island areas may also require flexibility to accommodate the time needed to find and secure the skills and resources to carry out the works.

5. Public Sector Buildings

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?

Strongly support

Please include any additional comments below:

We understand the need and desire for the public sector to be seen to be taking a lead on decarbonisation, but in the context of current budget cuts this has to be seen as a challenging timetable. It should also be noted that most of the ownership of public buildings in Scotland is not in direct central government control. Most public sector building ownership is expected to be in the hands of public bodies such as the NHS or local authorities. The government may therefore be setting the public estate a target yet not necessarily providing the means by which those authorities can achieve that target. We are worried therefore that we may see an ambitious target set with little or no means of achieving it in the context of public sector budget constraints.

The omission of leased public sector buildings from this proposal could also mean a significant gap in the decarbonisation of the public sector estate by 2038 as leased buildings will not be required to meet the same target by that date.

Local and other public authorities need to also recognise the life cycle of some of the technologies involved in decarbonising heat: heat pumps and electric panels. These systems have a shorter lifespan than boilers, as such replacement budgets need to raise alongside maintenance budgets. Heatpumps can have 15 years lifecycle whilst boilers can have 25 – 30 years. Changing over to zero emission fuel sources is one aspect of the financial commitment, but maintaining and replacing in the future is another.

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 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

Please include any additional comments below:

Again, this policy must be applied practically. Older properties may not be suitable. The use of the phrase 'polluting systems' is rather insidious, and may come to denigrate otherwise good homes and other buildings. The onus must be on making it cost effective rather than extremely expensive for non-polluting systems to be made net zero.

6. Amendments to existing legislation

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?

Yes

Please include any additional comments below:

There is a significant diversity of buildings, especially for the non-domestic sector. Our concern would be to ensure that there is sufficient flexibility in legislation definitions to allow for owner/occupiers to apply the most sensible approach to renewable heat targets they may be required to achieve.

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

Please include any additional comments below:

We agree. This is a new sector and at a very early stage of its development across Scotland. It will definitely require innovation in terms of financing, as identified by the recent Scottish Futures Trust report on Heat Networks delivery models.

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:

We agree. This is a new sector and at a very early stage of its development across Scotland. It will definitely require innovation in terms of financing, as identified by the recent Scottish Futures Trust report on Heat Networks delivery models.

WE HELP SCOTLAND'S REAL ESTATE INDUSTRY GROW AND THRIVE

To see a full list of our members and find out more about our work, visit our website at www.scottishpropertyfederation.org.uk

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