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Scottish Property Federation Response to
Heat in Buildings: New Build Heat Standard
Regulatory review options: discussion paper

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New Build Heat Standard: Review Workshop discussion paper

1. Thank you for inviting the Scottish Property Federation to comment on the NBHS Review discussion paper, we are pleased to contribute to this policy as we have earlier fed-in our members' responses to the New Build Heat Standard that came into force in April this year.
2. We appreciate that this paper investigates options for the provision of emergency heating systems to be provided for Island and rural communities. We are aware that in those areas grid capacity remains a huge concern as described in the discussion paper.
3. We acknowledge that it is a complex task to allow secondary DEH systems to be installed with the aim to achieve net zero targets and decarbonise the domestic stock, which the proposed Heat in Buildings Bill is aiming to deliver. As mentioned in the discussion paper, new builds do not have much demand for secondary heating systems, so, option 2 seems the most viable option to allow secondary systems such as wood burning stoves, or indeed another type of fuel, to be utilised as a reliable as a back-up energy source when compared with the consequences of in effect banning them.
4. Having said that, we do believe there should be clear definitions of 'emergency' and 'secondary system,' and clarification of the circumstances required for the switch to back up systems. This also raises the point of how these situations will be monitored and regulated. The standard should make both the definitions and enforcement clear to limit potential abuse of this regulation and to avoid uncertainty.
5. The areas this proposed NBHS is to be applied to will also have to be limited by geography. The NHBS must also clarify the definitions of biomass and bioenergy. This must consider and include clear indications of 'sustainably sourced' for that may be considered a transition fuel.

We hope these brief comments are helpful for the development of this part of the NBHS.

Kind regards,

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