

## Response ID ANON-ZYNJ-3TXV-Z

Submitted to Proposals for a Heat in Buildings Bill: Consultation  
Submitted on 2024-03-05 13:32:58

### 2. 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:

The Salvation Army supports this target date. The Salvation Army has a Net Zero target of 2040 and so are currently aiming to have all our buildings heated by clean technology by this date.

However, The Salvation Army believes that more market mechanisms need to be put in place to encourage/stimulate development of the clean heating technologies sector and drive down the cost which is currently still very expensive.

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)?

Strongly oppose

Please include any additional comments below:

The Salvation Army feels that this timeline is currently unrealistic and should be reviewed. As stated in question 1 we feel that the market needs to develop more, and costs come down before large scale adoption is feasible for many landlords. Additionally, it is impractical for us and for many private sector landlords holding significant property portfolios to deliver this kind of work on a large scale within this short time period of time. Delivering this type of work at scale on a large and dispersed estate such as ours takes careful planning and coordination with other planned works on the estate and these works have an impact on our tenants. Additionally, there is the risk of work being rushed and end up of poor quality due to time constraints. We think this target date should be extended to allow for the market to develop more, costs come down and give more time for these works to be planned properly.

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?

Neither support nor oppose

Please include any additional comments below:

The consultation is proposing to give owner occupiers an additional 5 years to comply compared to landlords needing to comply by 2028. The Salvation Army feels that an Owner occupier target of 2033 is much more practicable and reasonable than the 2028 target set out for landlords. We feel that the target of 2028 for landlords should be moved to 2033 to be in line with owner occupiers and the rest of the domestic property's timelines

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:

As the EPC criteria in Scotland is currently under review and will be changing, The Salvation Army cannot say whether it supports this or not until the current EPC consultation and review is completed. However the principle of a list of measures may seem helpful but may not be sufficiently agile to adapt to new technology as it develops.

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

Somewhat support

Please include any additional comments below:

The Salvation Army supports the improvement of buildings to reduce energy, cost and carbon to help the UK meet its Net Zero targets.

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

Please include any additional comments below:

Each building should be considered individually in terms of its ability to adopt suitable measures to meet the standard. There will always be individual cases where the standard cannot be met or it is uneconomical to do so. Processes for exemption in these situations should be put in place. Putting such buildings at risk of becoming unusable could result in replacement which would have a greater environmental impact.

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

Yes

Please include any additional comments below:

Tax incentives on energy efficiency measures and technology could help landlords with implementing these measures and reduce the costs.

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 who have no other clean heating system available, Yes, it should be permitted for those buildings already using it and for those buildings who have no other clean heating system available

Please include any additional comments below:

### 3. 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:

The Salvation Army supports the idea of a mechanism to encourage the transition to clean heating within a set period of time after a homeowner purchases the property. However, as this time frame has not been specified yet and will go under further consultation, we cannot fully support it at present.

The Consultation is currently suggesting a 2–5-years' timeframe. The Salvation Army would support a longer timeframe of 5 years.

Low income and first-time buyers need to be considered in terms of their ability to make meet the standard in any given time-frame. Exemptions should consider low-income-vulnerable households.

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:

The Salvation Army supports the longer timeframe of 5 years.

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?

Neither support nor oppose

Please include any additional comments below:

Any cost -cap should have sufficient flexibility to adapt to any new ways of achieving the standard -for example the leasing of heating systems is becoming common in other countries and could come to Scotland in future.

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

A size-based cost-cap.

If another, please suggest below:

A size-based cost cap is more realistic. For example, a large size home will require a larger amount of insulation than a smaller home.

Basing the cost on a 'size-based' cap, that applies to all buildings according to their internal area (£X / m<sup>2</sup>) will allow for suitable measures to be achieved while expected investment is capped at levels that are directly related to the size of the home.

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 support

Please include any additional comments below:

The Salvation supports the transition to low carbon heating systems in principle. However, any mandatory measures imposed need to take into account the financial ability and practicalities for a homeowner to install alternative technologies when replacing their heating. Providing financial incentives may prove to be a more effective lever.

#### 4. 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 support

Please include any additional comments below:

The Salvation Army supports the requirement that all heat networks will be required to generate most of their heat from renewables or bioenergy by 2045.

However, there are concerns over building and homeowners being locked into heat supply contracts with just one supplier or network operator. This can potentially lead to high costs and no ability to change supplier. We feel that this aspect needs further consultation and development before being put into practise.

Uncertainty around compliance could result in market distortions as a result of potential purchasers or tenants being unwilling to acquire homes affected, possibly leaving owners unable to sell.

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:

Similar to our response on question 14, there are concerns over building and home owners being locked into heat supply contracts with just one supplier or network operator. This can potentially lead to high costs and no ability to change supplier. The Salvation Army feels that this aspect needs further consultation and development before being put into practise. Uncertainty around compliance could result in market distortions as a result of potential purchasers or tenants being unwilling to acquire homes affected, and possibly leave owners unable to sell

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?

Somewhat oppose

Please include any additional comments below:

The Salvation Army believes this measure should only be relevant to Industrial Facilities, not properties used by non-commercial organisations or private individuals

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 oppose

Please include any additional comments below:

The Salvation Army believes such a measure should only be relevant to Industrial Facilities, and should not include properties used by non-commercial organisations or private individuals.

#### 5. 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?

Sampling a percentage of buildings.

Please include any additional comments below:

The benefit of sampling properties is that the costs of monitoring are taken away from the public. It is also a more proportionate system, given that monitoring would not apply to all of Scotland's 2,495,000 homes and 220,000 non-domestic buildings.

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 support extra Council Tax and Non-domestic Rates charges, in future, for those who don't comply.

Please include any additional comments below:

The Salvation Army believes that as everyone is already registered for council tax and non-domestic charges that this would be the most efficient way of enforcement.

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:

The Salvation Army recognises that the transition to clean heat technologies will be the responsibility of all building owners. However, we also recognise that there will be individual circumstances where there are constraints on making the building more efficient or adopting clean heating technologies. Furthermore, the individual needs of vulnerable tenants or homeowners mean they will need exemptions for various reasons.

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:

The following should be exempt:

- Hard to treat buildings.
- Multi-ownership Flats
- Vulnerable Tenants with special needs
- Charitable organisations

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

Strongly support

Please include any additional comments below:

The Salvation Army recognises that in certain circumstance some building owners will need more time to meet the standard. Technologies are still developing and there will be considerable challenges in certain cases to achieve the necessary building alterations. The Salvation Army feels that clear guidance on exemptions should be developed with an easy process to apply for exemptions.

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

Please include any additional comments below:

The Salvation Army believes the following should be eligible for extra time:

- People of low income where meeting the target date would put them under financial strain or debt.
- Charitable Organisations

## 6. 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:

The Salvation Army supports this target. The public sector and government should be leaders in adoption of these technologies and their implementation to encourage both the private and third sector to follow. Additionally, by meeting such targets the public sector will help grow the market for low carbon heating systems and encourage cost reduction

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.

Creating a new duty for each public body to develop and implement a plan to decarbonise their buildings;

Please include any additional comments below:

## 7. 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?

Don't know

Please include any additional comments below:

The Salvation Army has no comment to make on this matter.

27 Do you agree that the Heat Networks (Scotland) Act 2021 should be amended in light of the passage of the Energy Act 2023?

Don't know

Please include any additional comments below:

The Salvation Army has no comment to make on this matter.

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:

The Salvation Army has no comment to make on this matter.

## About you

29 What is your name?

Name:

David Cavanagh

30 What is your email address?

Email:

scotland@salvationarmy.org.uk

31 Are you responding as an individual or an organisation?

Organisation

32 What is your organisation?

Organisation:

The Salvation Army

33 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

34 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

35 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

## Evaluation

36 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: