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*improving living in scotland*



**RESPONSE TO SCOTTISH GOVERNMENT CONSULTATION ON  
TOWARDS DECARBONISING HEAT: MAXIMISING THE  
OPPORTUNITIES FOR SCOTLAND  
DRAFT HEAT GENERATION POLICY STATEMENT**

**06 June 2014**

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## ABOUT HOMES FOR SCOTLAND

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Homes for Scotland is **the** voice of the home building industry.

With a membership of some 180 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

Visit [www.homesforscotland.com](http://www.homesforscotland.com) for further information and follow us on twitter @H\_F\_S

## PROCESS

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Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

This consultation response has been discussed, drafted and approved by (insert specific HFS Group or Committee).

# RESPONSE TO SCOTTISH GOVERNMENT CONSULTATION ON TOWARDS DECARBONISING HEAT: MAXIMISING THE OPPORTUNITIES FOR SCOTLAND DRAFT HEAT GENERATION POLICY STATEMENT

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## 1. Introduction

- 1.1 Homes for Scotland (HFS) is *the* voice of the home building industry in Scotland, with a membership of some 200 organisations together providing 95% of all new homes built for sale across the country as well as a significant proportion of affordable housing. We are committed to improving the quality of living in Scotland providing this and future generations with warm, sustainable homes in places people *want* to live.
- 1.2 HFS make policy submissions on local and national government policy issues affecting the industry, and its views are endorsed by the committees and advisory groups of industry representatives derived from our members.
- 1.3 The Scottish home building industry has supported the delivery of the Scottish Government's ambition to decrease carbon emissions and reduce the energy required by home owners to maintain warm and comfortable places to live. Through increases in building standards, energy performance targets and 'fabric first' approaches, new homes built today offer greater energy efficiency and significantly reduced running costs compared to existing housing stock.
- 1.4 With regard to the vision outlines within the 'Draft Heat Generation Policy Statement' HFS welcomes this opportunity to respond to the ambition of the Scottish Government.
- 1.5 Whilst our industry is supportive of the objectives of the low carbon agenda, there are concerns that the ambitious targets set out by this policy statement may further impact upon the sustainable delivery of increased housing output to begin to meet the identified 500,000 homes required by 2035.

## 2. New Developments

- 2.1 *"New developments should be future-proofed to ensure that connections to existing or planned heat networks are taken forward as soon as they are viable."* (paragraph 5.5)
- 2.2 HFS believes that it is important that any requirement to increase the number of homes connected to heat networks or district heating systems should not prohibit, or place additional cost and burden on to the delivery of new homes. Not only could such policies pose a risk to commercial viability of future

development programmes, but it is also feared that such policies could add further complexity to land and supply issues and could be likely to lead to longer development cycles.

- 2.3 This sentiment is echoed in previous HFS responses to a number of Local Development Plans that inconsistently interpret national policy on low carbon energy, asking developers to *consider* linking to heat networks then asserting that *“exceptions would only be granted where it is demonstrated that links are not feasible”*. It is clear that as opposed to this aspiration being optional and demand driven, policy statements such as the one highlighted above imply that this would be compulsory which is likely to be considered anti-competitive.

### 3. **Ambition**

- 3.1 *“We therefore, propose to set a target of 40,000 homes to be supplied with low cost, low carbon heat through heat networks and communal heating by 2020.”* (paragraph 5.25)

- 3.2 It can not be understated that HFS believes this target to be highly ambitious and would place additional burden upon the industry already seeking to meet the ambitious targets set out within the Sullivan Report<sup>1</sup> towards 2020. We believe that in order to reduce the demand for energy, a ‘fabric first’ approach remains the best way to achieve this within the short to medium term, and this is best implemented through Building Standards.

Prepared by:

Name: Michael Barton-Maynard

Title: Policy Officer

Email address: m.barton-maynard@homesforscotland.com

Homes for Scotland

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<sup>1</sup> Sullivan Report 2007 (<http://www.scotland.gov.uk/Resource/Doc/217736/0092637.pdf>)

5 New Mart Place  
Edinburgh  
EH14 1RW  
Tel: 0131 455 8350  
Fax: 0131 455 8360  
Email: [info@homesforscotland.com](mailto:info@homesforscotland.com)  
Web: [www.homesforscotland.com](http://www.homesforscotland.com)  
Twitter: @H\_F\_S