16 August 2024

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

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 ddefinitions 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,

[REDACTED - Regulation 11(2)]

more about our work, visit our website at www.scottishpropertyfederation.org.uk

Registered number:
778293 England

Registered office:
St Albans House
5th Floor, 57-59 Haymarket
London SW1Y 4QX

[REDACTED - Regulation 11(2)]

Subject: Re: NBHS Review Islands Workshop
Date: 06 August 2024 10:03:32
Attachments: mime-attachment.ics
NBHS Workshop Agenda.docx
NBHS Review - Workshop discussion paper - July 2024.docx

[REDACTED - Regulation 11(2)]

Apologies, I have a unexpected meeting clash and will no longer be able to join; however, I'm pleased Tighean Innse Gall are able to join and will be able to share their wealth of experience from working on a wide range of projects in the Western Isles.

A quick thought which may be useful to think about - In addition to those that have been mentioned in the papers, there is another potential unintended consequence to consider that may or may not emerge during conversations - increasing house building costs and associations with addressing depopulation, reinvigorating townships, cultural heritage etc. One potential solution proposed in Uist to assist with the housing and depopulation challenges is to free up land in townships to create building plots for young families etc to build their own home. The requirement for new homes to only have heat sources such as from air source heat pumps may increase the costs to an extent which would remove the affordability of self builds in such a situation.

Kind regards,
[REDACTED - Regulation 11(2)]

Sent from my iPhone

[REDACTED - Regulation 11(2)]

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[REDACTED - Regulation 11(2)]

Subject: RE: [EXTERNAL] RE: Wood burning stoves
Date: 06 June 2024 14:14:03

[REDACTED - Regulation 11(2)]

Per your email I'd be very grateful if you would feed the following into the process:

The Crofting Commission - Concerns Regarding New Build Heat Standard Regulations

Dear Ms. Gillian Martin, MSP,

I am writing to you today on behalf of the Crofting Commission to express our concerns regarding the regulations within the New Build Heat Standard which prohibit the installation of solid fuel burning stoves in new build homes in Scotland.

We understand the Scottish Government's commitment to reducing carbon emissions and improving energy efficiency in new homes. However, we believe that the current regulations fail to take into account the specific circumstances of crofting communities and undermines the rights that crofters have enshrined in law.
Under The Crofters (Scotland) Act 1993, crofters have the right to harvest peat within their crofting tenure, (section 17, point 6). This right is essential for many crofters, particularly those in remote and island locations where access to alternative fuel sources is limited and often expensive.

We are disappointed to learn that the islands impact assessment for the changes to the new heat build standard appears not to take into consideration the legal impact that these regulations will have upon the rights of crofters.

The Crofting Commission proposes an amendment to the New Build Heat Standard regulations. We believe that a statutory croft house on a statutory croft house site should be exempt from the regulations. This would ensure that the rights of crofters under crofting legislation are protected and that they are able to continue to utilise peat for domestic heating purposes where necessary.

We would welcome the opportunity to discuss this matter further with you and your team at your earliest convenience.

Thank you for your time and consideration.

Yours sincerely

[REDACTED - Regulation 11(2)]
Crofting Commission

Kind regards

[REDACTED - Regulation 11(2)] – personal info

Subject: [EXTERNAL] RE: Wood burning stoves

Mail originates from outside The Crofting Commission!
Be vigilant before you click on a link, open attachments or reply!

Good morning **[REDACTED - Regulation 11(2)] – personal info**

Thank you for your email. If there is anything you wish to raise regarding this matter, please email us and we will make sure that it is fed into the review process.

Kind regards

[REDACTED - Regulation 11(2)] – personal info | Crofting Policy and Legislation | Agriculture and Land Reform Division | Scottish Government | T 0131 244 9841 | D Spur, Saughton House, Broomhouse Drive, Edinburgh EH11 3XD

Sent: Monday, June 3, 2024 11:03 AM

[REDACTED - Regulation 11(2)] – personal info

I see that it's being well trailed that the SG has called the direct heat regs back in for review. I know we've already discussed it but do you need anything else from us re crofters, peat and the right to use it to fuel their houses to add to the review?

Kind regards

[REDACTED - Regulation 11(2)] – personal info

Crofting Commission | Great Glen House
Leachkin Road | Inverness | IV3 8NW

Coimisean na Croitearachd | Taigh a' Ghlinne Mhòir
Rathad an Leacainn | Inbhir Nis | IV3 8NW

Our Register of Crofts is available online at www.crofting.scotland.gov.uk/register-of-crofts-roc.

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From:	[REDACTED - Regulation 11(2)] – personal info
To:	
Cc:	
Subject:	RE: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July
Date:	05 August 2024 14:02:13
Attachments:	SLE Debate Brief - The Importance of Woodburning Stoves to Homes in Rural and Island Communities - 29.05.24.pdf

[REDACTED - Regulation 11(2)] – personal info

I have attached the briefing we circulated to MSPs prior to the debate at the end of May. This has good resources that you should find helpful in respect of woodlands. A particularly good resource is this one from Forest Research: https://www.forestresearch.gov.uk/tools-and-resources/fthr/biomass-energy-resources/fuel/woodfuel-production-and-supply/woodfuel-production/forestry-for-woodfuel-and-timber/economic-benfits-of-woodland-management/

While I am thinking of them, here are a couple of anecdotes that are also relevant:

Dormont Estate, Lockerbie – Built their pioneering Passivehaus affordable homes in 2011, the homes had wood burners installed in addition to solar so that the tenants had a free option for their water heating 24/7, in addition to it providing top up space heating in the winter. Under these new regulations, Dormont would have been unable to protect their tenants from energy costs in this way. The logs are provided through the estate's own woodland management[REDACTED - Regulation 11(2)] – personal info would be very happy to show you and the team these properties. https://www.scottishhousingnews.com/articles/low-energy- housing-could-help-tackle-affordable-rural-homes-shortage

Ardlussa Estate, Isle of Jura – [REDACTED - Regulation 11(2)] – personal info planted a commercial woodland plantation as an experiment to see if it could provide an income stream back then. The timber has failed to reach a grade that would justify shipping the timber to the mainland, or be used for construction on the island. However, this timber has by chance become ideal feedstock for the biomass district heating system. See this article in the SLE Landbusiness magazine (Winter 2023) for a bit of colour around this summary: https://misc.pagesuite.com/pdfdownload/01461197-ce34-41ac-be7a-3466a5b733c4.pdf . I am sure [REDACTED - Regulation 11(2)] – personal info would be happy to talk through the value of his biomass to this part of Jura to your team if that would be a help. [REDACTED - Regulation 11(2)] – personal info

As far as **domestic and non/domestic** is concerned, in rural and island areas they suffer from the same challenges. They should not be treated differently. The issue around the NBHS is locational. In economically challenging times rural businesses also suffer from their own form of fuel poverty as energy prices have risen, and they certainly suffer from the same electricity outages as domestic. Some rural industries are energy greedy and bioenergy is a good solution, especially where waste heat can be used to heat neighbouring properties.

What is also worth noting is that some rural dwellings are served by commercial electricity supplies through "private wire" because of the challenges (cost and otherwise) of running a separate electricity supply to a dwelling. Commercial electricity rates are far more expensive than domestic energy rates. We have members who subsidise their tenants because they won't pass on the full electricity cost to them. As the NBHS stands, to avoid exacerbated electricity charges, those wanting to build new

or convert will require new connections. The cost of doing this will jeopardise viability. This is yet another barrier to bringing forward new housing in rural Scotland.

I am also concerned by the risk that "emergency heating" as defined leaves diesel generators and gas fires as the go-to solution. Timber and peat must be an option. Emergency heating options in remote areas need to be able to source the fuel locally. Diesel and gas are often many miles and sometimes a ferry away – journeys that can't always be, and most probably shouldn't be undertaken when electricity transmission fails.

It would be good to catch up again on this. I have pretty good availability throughout August. Week commencing 19th and 26th are fairly clear at the moment (but unlikely to be for long!).

I am also keen to have a meeting with Dr Allan too – given the pace of the review, the date for the Baddinsgill visit is now too far down the line.

Kind regards,

[REDACTED - Regulation 11(2)] – personal info
Scottish Land & Estates

[REDACTED - Regulation 11(2)] – personal info
Subject: RE: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

Thanks for coming along, [REDACTED - Regulation 11(2)] – personal info, and for your contributions.

You mentioned some information around surplus/ timber materials which can't be used in other ways and therefore domestic burning makes sense in those circumstances. We'll check what info forestry colleagues have but grateful for any research on this you think would be handy to have as part of the review, especially one which may include commentary around proportions of heat demand satisfied/ number of properties that can be supplied etc.

Would also really welcome views around the domestic/ non-domestic split question – seemed that opinion was variable on whether both should be treated the same.

Happy to catch up again later in August as we bring the engagement phase to an end and a final option/ drafting is emerging – if so, let me know what your availability may be.

Many thanks,

[REDACTED - Regulation 11(2)] – personal info

Subject: RE: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

Hi [REDACTED - Regulation 11(2)] – personal info
Thanks very much for holding the workshop. Please let me know if there is anything you want to pick up further with me.
Kind regards,

[REDACTED - Regulation 11(2)] – personal info Scottish Land & Estates

[REDACTED - Regulation 11(2)] – personal info
Subject: FW: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

Dear Stakeholder,

Please find attached a discussion paper for the NBHS Review Workshop on Tues 30 July, setting out the options which we will aim to explore with you on the day. We are also keen to hear any alternative options that you may have.

If you are unable to attend the workshop we would welcome any views or comments you may have by email – our mailbox is 2024heatstandard@gov.scot.

Looking forward to speaking with you soon.

[REDACTED - Regulation 11(2)] – personal info

[REDACTED - Regulation 11(2)] – personal info
Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

Dear Stakeholder,

Invite to participate – Scottish Government NBHS Review - Workshop (Rural

focus) - Tuesday 30 July, 14:00-15:30

On 28 May the Minister for Climate Action announced a review of the New Build Heat Standard in response to the concerns raised regarding the reliance on biomass and solid fuel burning stoves in rural and remote areas. As part of this Review Scottish Government officials are holding a series of stakeholder workshops to gather evidence and views on the use of woodburning stoves, and bioenergy more widely within new buildings.

The New Build Heat Standard, as it stands, applies only to new buildings and certain types of conversions applying for a building warrant from 1 April 2024. Solid fuel burning stoves or other 'direct emission heating systems' can still be installed to provide 'emergency heating' where such a solution can be justified. However, we acknowledge that the way in which technical guidance is currently drafted on what constitutes emergency heating can be difficult to reconcile with the nature of wood burning stoves which are often installed for more frequent use, rather than solely as emergency systems.

As a key stakeholder, you are invited to attend this workshop which you can join via the link below. We will circulate a paper ahead of the workshop detailing the options officials have identified based on the review of evidence and previous responses to engagement. If you would like to send any evidence ahead of the workshop – we would really appreciate this at 2024heatstandard@gov.scot.

I would be grateful if you could reply to this email to **confirm if you plan to attend**.

Best regards,

[REDACTED - Regulation 11(2)] – personal info
Heat in Buildings Division
Directorate for Energy & Climate Change
Scottish Government

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From: [REDACTED - Regulation 11(2)]
To:
Subject:
Date: Issues for New Build Heat Standard review
24 July 2024 15:11:36

Dear Sir or Madam

Ahead of next week's workshop on the above review, evidence was requested so a few considerations follow from the Woodland Crofts Partnership, from a woodland crofts/forestry/wider crofting perspective:

- There is Scottish Government support for the creation of new woodland crofts which by definition will have new houses on them. In the past it has been possible to say: "whatever else your woodland croft can provide for you, as a minimum it will keep you self-sufficient in heating fuel" - which is a significant benefit. This USP will be lost if a blanket ban on biomass in new builds is retained.
- More widely, occupiers of land such as crofters & farmers, and owners of forests can sustainably grow all their own heating fuel from their own land with minimum 'fuel miles', and provide the corresponding benefits arising through managing that land for fuel: shelter; biodiversity; improved timber quality etc. All that will be in danger of being lost without a rural exemption to a ban on biomass use in new builds.
- Away from timber, many crofters have rights to cut peat as a traditional/cultural activity. However, if they build a new house, they would not be able to burn their own peat in it, if new rules are not sufficiently flexible to recognise this tradition.
- All the above have particular consequences in an area with high electricity charges and high fuel poverty: an opportunity for occupiers of land to provide fuel for themselves and avoid these costs would be removed by an inflexible, 'one size fits all' restriction on biomass use.
- There is likely to be a significant impact on forest management, particularly in respect of broadleaved thinnings, if the woodfuel market declines as a result of such a restriction. This market is especially important for community woodland owners who often switch to native trees from conifers (for a variety of reasons)

We recognise that as well as highlighting the potential problem it is important to be able to suggest solutions and not simply resist all change, so here follow a few possibilities (which are not necessarily mutually exclusive):

- A general (or more restricted) rural exemption – there are lots of different area classifications that are already in use which could be used for this
- Devolving the decision on biomass use to the Local Authority who will be able to assess applications on a case-by-case basis
- Applying minimum efficiency standards by limiting which equipment is permitted eg only 'dry' stoves (without boilers) or purpose designed log boilers with thermal stores
- An exemption for crofters
- An exemption for any occupier of land who can demonstrate that they will supply their own fuel (there's already a similar mechanism in place regarding RHI payments, via the Biomass Suppliers list (self-suppliers))

There must be a sensible and pragmatic solution in amongst all that which will recognise the intent of proposed new rules (no-one for example objects to a ban in urban areas) but caters for the minority of people, in rural areas, for whom biomass will continue to be an important and crucially, low-carbon, opportunity for heating their houses.

Regards

[REDACTED - Regulation 11(2)]

On behalf of the Woodland Crofts Partnership
www.woodlandcrofts.org

Virus-free.www.avast.com

New Build Heat Standard: Review

Response from UKIFDA and OFTEC

This short document responds to the current review of the New Build Heat Standard (NBHS) with respect to Bioenergy.

The liquid fuel industry has over the last three years successfully demonstrated in 150 homes across the UK, including 12-15 in Scotland, that fossil heating oil can be displaced with a renewable liquid fuel called HVO.

The current review is engaged primarily around resilience of heating systems in new buildings in the event of any interruption to the supply of electricity. This is clearly a concern for both new builds and existing homes as the electrification of heat and transport will put significant additional strain on both the transmission and distribution networks in Scotland and in particular rural Scotland where the majority of our oil using customers live.

The current legislation effectively means for new builds you have to install a heat pump, electrical resistive boiler or connect to a heat network and you can only install alternatives for emergency purposes only.

The review has some stated objectives:

- Address concerns on the resilience of communities during periods of extreme weather and other events which may cause the failure of the main heating system;
- Maximise emission reductions from new buildings to help achieve our wider goal of net zero by 2045 and any interim targets;
- Deliver the best outcomes for human health and the environment, including the effects of air pollution from any combustion systems; and
- Respect cultural practices – for some communities, including crofting ones, the act of cutting peat is not only a practical necessity but also a social gathering, with communities coming together to help one another; open fires are often also used in religious worship.

We believe there are some additional objectives that can be met if the right option is chosen which were essentially outlined by the government in the recent heat and building strategy consultation including that homeowners should have:

- Options that are *"affordable, fair and feasible"*
- *"various ways"* to meet their decarbonisation targets
- Should *"have choices over the path to net zero"*

The government also stated it was *"determined to protect people from unacceptable short-term costs"*.

Ultimately the removal of fossil fuels is a key goal in meeting these objectives.

We believe that the inclusion of bioenergy heating systems is a viable pathway to meet all of the above objectives. It will also ensure the treatment of existing and new homes is the same, leading to greater simplicity for local authorities and housebuilders and greater buy-in from rural local communities.

Many of the arguments for bioenergy including HVO have been made in our response to the most recent heat and building consultation. However we wish to make some additional points:

- HVO in pure form and derived from a waste feedstock such as used cooking oil (UCO) reduces carbon emissions by up to 88% compared to kerosene. This allied to new build standards will mean carbon emissions are minimal.
- A HVO boiler fitted in a building that incorporates a small standby generator fuelled by HVO (to allow for burner operation, system circulation pump and controls.) is a viable solution to new builds in areas where electricity resilience could be an issue. This also has the advantage that emissions from the build be better aligned to the buildings designed emission performance than if a secondary heating fuel is used for an unknown period of time. Fuel for the generator and boiler is the same, so will already be on site in an emergency.
- Air quality tests comparing a diesel generator versus a HVO generator showed a significant NOx reduction of 7.5% showing that using HVO fuel improves air quality by simply changing the fuel.
- HVO fuel is completely biodegradable, non-toxic and odourless as it's made from 100% renewable waste materials.
- HVO used for domestic heating purposes should comply with EN 15940, be derived from verifiable and sustainable waste sources. Each batch should be accompanied by a proof of sustainability document and the fuel has been independently verified and certified to be sustainable and derived from waste streams by the ISCC (International Sustainability and Carbon Certification). In addition, the British Standards Institute (BSI) has recently published a new Publicly Available Standard (PAS 5420:2023 Liquid fuels – Sustainable bioliquid fuels for use in fixed combustion applications for heating, hot water and cooking – Specification.) This came into force on 30th April 2023.
- A HVO boiler and generator is significantly less expensive than a heat pump and does not rely upon electricity.
- A HVO boiler can be easily installed by a local heating engineer (in the same way as replacing a regular fossil fuel boiler).

Proposal

We believe there is a reasonably simple solution that will answer the majority of the issues surrounding the current review but also extend into similar issues around existing buildings.

The current legislation (The Building (Scotland) Amendment Regulations 2023) defines

""direct emission heating system" as a "fixed combustion appliance installation"

We propose that the inclusion of the term fossil fuels is added – ""fixed combustion appliance installation using fossil fuels."

There is already a definition of fossil fuels in the Energy Act 1989:

- "fossil fuel" means—

  (a)coal,

  (b)lignite,

  (c) natural gas (within the meaning of the Energy Act 1976),

  (d) crude liquid petroleum,

  (e) petroleum products (within the meaning of that Act), or

  (f) any substance[other than bioliquid,] produced directly or indirectly from a substance mentioned in paragraphs (a) to (e);

"bioliquid" has the meaning given by Article 2(h) of Directive 2009/28/EC of the European Parliament and of the Council on the promotion of the use of energy from renewable sources:

- 'bioliquids' means liquid fuel for energy purposes other than for transport, including electricity and heating and cooling, produced from biomass;

We believe this solution would also allow the additional use of hybrid technology (a HVO boiler and heat pump) and also biomass boilers such as wood.

About OFTEC and UKIFDA

Established in 1991, OFTEC is a 'not for profit' trade organisation representing manufacturers of liquid fuel heating and cooking equipment and training providers in the UK and Republic of Ireland. As part of our commitment to ensuring high standards, we run a competent person registration scheme for heating technicians working in off-gas grid heating, including liquid fuels, biomass, heat pumps and solar thermal technologies.

UKIFDA is the representative body of the liquid fuel distribution industry in the UK and represents the companies that deliver fuel directly to over 1.7m homes and 250,000 businesses. Our membership includes many family businesses that have passed their ownership down through generations and live within the communities they serve.

From: [REDACTED - Regulation 11(2)] personal info
To:
Subject: Re: New Build Heat Standard Working Group - Review Session 30 July 2024 19:55:18
Date:

[REDACTED - Regulation 11(2)] personal info

I might be late for about 20-30 minutes as the start of the meeting clashes with another engagement. My comments:
Re Option 1: maybe wording "emergency heating" can be substituted by "when main heating cannot provide adequate heating"?
Re Option 2: the definition of secondary heating is a "room heater", not a heating system that heats all dwelling. So, possibly specifying fraction of the dwelling which is heated by secondary heaters is important.

Regards [REDACTED - Regulation 11(2)] personal info

Sent from Outlook for Android

[REDACTED - Regulation 11(2)] personal info

Subject: RE: New Build Heat Standard Working Group - Review Session

Hi All,

Attaching a discussion paper in advance of the meeting on Thursday, agenda is copied below.

Appreciate that not everyone can make it along, but thought it would be useful to share the paper for info in any case,

Thanks,

[REDACTED - Regulation 11(2)] personal info

Agenda

NBHS – introduction, background and the review	10 min
Potential options for legislative change	5 min
Options 1 & 2 – discussion	20 min
Option 3 – possible amendments	5 min
Option 3 – discussion	20 min
Treatment of peat – background	5 min
Treatment of peat – discussion	10 min
Any other legislative amendment proposals - discussion	10 min
Wrap up	5 min

-----Original Appointment-----

[REDACTED - Regulation 11(2)] personal info

Subject: New Build Heat Standard Working Group - Review Session
When: 01 August 2024 10:00-12:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
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[REDACTED - Regulation 11(2)]

Subject: Evidence from the SIA
Date: 16 August 2024 12:30:06
Attachments: A Review of the Impact of Domestic Combustion on UK Air Quality (7).pdf
FINAL DRAFT SIA White Paper v.6.pdf
Up in Smoke - The contribution of domestic outdoor burning to UK particulate matter emissions.pdf
Up in smoke scenario modelling.pdf
Wellbeing report.pdf

[REDACTED - Regulation 11(2)]

Following our recent meeting via CAFS2, I attach a number of reports which I believe are pertinent:

1. The Contribution of domestic burning to UK Air Quality
2. A white paper highlighting its findings - these were early reports commissioned by the SIA which show amongst other things , that the more complete combustion in modern Ecodesign stoves increases the proportion of inorganic salts in PM and also the underestimates of outdoor burning. These led to the following reports:
3. Up in smoke – a literature review using then current emissions factors which estimated that outdoor burning could be vastly underestimated. The calculations amnd models were subject to monte-Carlo analysis ad showed that 46% of domestic emissions could be from domestic outdoor burning.
4. Up in smoke scenario modelling – uses the same robust models to show the implication os various interventions such as banning incineration of garden waste and mandatory replacement of open fires and old stoves with new technology and the attendant reduction in PM emissions – which could be very significant.
5. A literature Review by Dr Amanda Lea Langton from Manchester University on the impacts of modern woodburning stoves on indoor air quality. The conclusions speak for themselves and contradict many biased reported studies.
6. A literature review on the wellbeing and socioeconomic benefits of woodburning.

I hope that you find these of use – if you have any questions please do not hesitate to contact me.

Finally to reiterate some comments made during the meeting regarding the options you presented:

Option 1:

Amending the definition of emergency heating does not go far enough. Emergency secondary heating could be driven by economic necessity and lifestyle choices (similar to peat).

Option 2: We think this is probably the most workable and equitable solution and aligns with the proposed Heat in Buildings standard thus making amendment of the technical guidance more straightforward. There should however be a caveat and exception if woodburning stoves are the only and therefore primary source of heat. While we think the number of solid fuel stoves installed in new builds is higher than the fgures you presented based on our members sales, if homes that are built are highly insulated and heated by eg heat pumps – the actual requirement and use of a secondary wood stoves would be minimal as they would only be needed in extreme conditions or due to emergency or economic drivers.

Option 3: Sustainably produced biofuel – especially wood IS sustainable and low carbon – still the lowest form of carbon heating. We would reiterate the figures that your own research and the evidence we have submitted previously on this point. If as society we are to reduce carbon emissions we must embrace all low carbon technology – especially in the medium term as we increase our intermittent electricity generators and face increased demand any technology which reduces grid and network demand and is low carbon should be encouraged rather than deprecated. Replacement of all openfires and old stoves could result in 90% reduction of PM and be the lowest carbon emitting

heating. Scotland is rich in wood resource and sustainable woodfuel production provides economic benefit to rural economies, and its use reduces demand on the electricity network and gas grids. Schemes exist to allow legislators and homeowners to specify/choose the most performant boilers and stoves eg clearSkies Mark ltd. We would need more information on what option 3 refers to before we could offer comment. I hope this helps and we look forward to seeing outputs in the near future. As always I remain available to support if you require clarification on matters stoves and fuels.
With Kind regards, James

[REDACTED - Regulation 11(2)]
Stove Industry Association
[REDACTED - Regulation 11(2)]

[REDACTED - Regulation 11(2)]

Subject: FW: Correspondence from the Minister for Climate Action - Dr Alasdair Allan
Date: 02 September 2024 10:35:33
Attachments: image001.png
image002.jpg
Correspondence from the Minister for Climate Action - Dr Alasdair Allan - 21 August.pdf

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Moray Comments - New Build Heat Standard Direction – Consultation with Verifiers

I have provided comments from Moray Building Standards and Climate Change teams below in respect of the new build heat standard direction.

Building Standards Team

Our team had a representative on the Building Standards HUB group referred to in the covering letter and are supportive of this direction until such time that the current review is implemented via an amendment to building regulations.

Climate Change Team

We are generally supportive of the direction but propose a nuanced approach based on geographical location. In rural areas such as Moray, where sustainable biofuels are more readily available and where such heating methods may serve as a crucial alternative during power outages, the direction is justified. However in large urban centres, where air quality concerns are more pronounced (i.e. LEZ locations) and where availability of sustainable fuels may be limited, a more cautious approach is warranted. To balance the need for flexibility with the imperative of meeting climate targets, we suggest that the direction and amendments explicitly differentiate between rural and urban settings in a considered manner. This would enable an approach that addresses the specific needs and challenges of each environment whilst addressing the climate emergency. We would welcome further consultation on such an amended approach to ensure that it meets the needs of rural areas including Moray.

Best regards,

[REDACTED - Regulation 11(2)]
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Your views on our service are important to us, please take a moment to share your experience in the National Customer Satisfaction Survey for Building Standards.

Submit your Building Warrant Application Online

[REDACTED - Regulation 10(4)(e)]

From: [REDACTED - Regulation 11(2)]
Subject: CAFS2 - New Heat Standard Workshop
Date: 29 July 2024 11:22:24
Attachments: image733207.png
image923921.png
image694599.png
image512992.png
image360379.png
image802575.png

Dear Sir/Madam
I am writing to submit the following report as evidence ahead of the CAFS2 New Heat Standard Workshop on Wednesday 31 July.
Asthma + Lung UK Scotland campaigns to reduce emissions that damage our health and woodburning is a contributor to harmful emissions causing lung conditions and exacerbating existing lung conditions. In autumn 2022, we published a Domestic Burning in Scotland report. Please find the report on the landing page here - Domestic Burning in Scotland | Asthma + Lung UK (asthmaandlung.org.uk)
If you have any questions, I would be happy to answer.
Kind regards

[REDACTED - Regulation 11(2)]

AsthmaAndLung.org.uk

Breath is life – and it's worth fighting for

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From:	[REDACTED - Regulation 11(2)]
To:	2024 Heat Standard
Cc:	
Subject:	Building Standards; [REDACTED - Regulation 11(2)]
Date:	New Build Heat Standard Direction - Consultation with Verifiers - Angus
Attachments:	11 September 2024 15:06:15 image001.jpg image002.png image003.png Correspondence from the Minister for Climate Action - Dr Alasdair Allan - 21 August.pdf

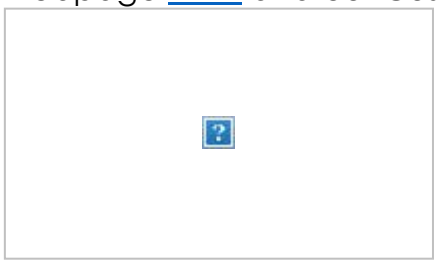
Good afternoon,
In response to the attached correspondence from the Minister inviting comments from Verifiers to the draft direction relaxation of standard 6.11 please find Angus Councils response below:

- Clause 6.11.2 Emergency heating – 'Unexpected interruption of power is rare', unfortunately given the scale of storms we have encountered over the last few years, loss of power is becoming more common than usual with some loss of power occurring regularly and lasting days not just hours, specifically for those in rural areas.
- What is the definition of 'rural' when it comes to Verifiers making determinations on proposals? Many villages and small towns across Scotland could be deemed rural, 2 local 'towns' within our authority are classed as towns which were seriously affected by storm Babet where residents lost power to their homes for days, with the only heating source for many being a fireplace or wood burning stove.
- Additional guidance on when/where these systems are deemed acceptable or not would help each local authority and allow us to have a consistent approach.
- The direction appears to allow biofuel, biomass and peat systems to be installed as the main source of heat or hot water in a new dwelling and still suggests it would not be appropriate as an emergency heating system (fixed) in clause 6.11.2. Is this the intention? If so, if a dwelling is intended to have another main heating source (air source heat pump etc) then if a wood burning stove is intended as a 'fixed' emergency heating system 6.11.2 still appears to say it would not be allowable. It would only be allowable as the main source of heating and hot water. We would note the directions explanatory note does cover this but the direction itself may not reduce the dubiety over the emergency heating clause as this still appears to be open to interpretation.

We do value all of the feedback from our customers and are constantly working to improve the service as a result of the suggestions that we receive. Please complete our **national customer satisfaction survey here.**
Regards,
[REDACTED - Regulation 11(2)]

We are agile! Angus Council Building Standards have adapted to new

hybrid ways of working. For more information refer to our ‘contact us’ webpage **HERE** and our Customer Charter **HERE.**



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[REDACTED - Regulation 11(2)]

Cc: Building Standards
Subject: FW: Correspondence from the Minister for Climate Action - Dr Alasdair Allan
Date: 13 September 2024 11:28:47
Attachments: image001.png
Correspondence from the Minister for Climate Action - Dr Alasdair Allan - 21 August.pdf

Good morning

Apologies for the late response, I see the cut off was 11th September 2024,
Hopefully you will be able to add Aberdeenshire Council Building Standards comments as follows:
we overall agree with the direction and welcome the changes, however in the guidance notes it states-
"This Direction relaxes standard 6.11 to permit the installation in a domestic building of **single** fixed combustion appliances which use wood or peat – e.g. woodburning stoves."
Does this mean you are only allowed one fixed combustion appliance per dwelling or more than one?

[REDACTED - Regulation 11(2)]

Building Standards | Housing + Building Standards | Environment + Infrastructure Services
Aberdeenshire Council
[REDACTED - Regulation 11(2)]
If you have recently used our service, please share your feedback in the *national customer satisfaction survey for building standards*
Please remember to submit all Building Standards related applications, including revised drawings and additional supporting information via the National eBuilding Standards portal
Website: http://www.aberdeenshire.gov.uk/planning/building-standards/
Freedom of Information request: Please send your enquiry to foi@aberdeenshire.gov.uk

[REDACTED - Regulation 10(4)(e)]

From: [REDACTED - Regulation 11(2)]
To:
Subject: 2024 Heat Standard
Date: RE: Review of the New Build Heat Standard
25 July 2024 20:38:52

[REDACTED - Regulation 11(2)]
My comments as below:
[REDACTED - Regulation 11(2)]
Isle of Rum Community Trust
[REDACTED - Regulation 11(2)]

Registered Office: Kinloch, Isle of Rum PH43 4RR Charity SC039637 Company SC321870

[REDACTED - Regulation 11(2)]

Subject: RE: Review of the New Build Heat Standard

[REDACTED - Regulation 11(2)]

Many thanks for your comments, those are really useful and informative and we've saved them as evidence to be considered as part of our Review, and are looking forward to your participation in the discussion at the workshop.

We just had a few questions that would be really useful if you've got a spare minute to answer:

- "Do heat networks or district heating play any role on the island at present? And, given that heat networks are classified as any system supplying more than one property (including small-scale installations), do you see this as a future option for the island?

No. We looked at this but we, and all the experts we have worked with, couldn't get it to stack up.

- Is a communal system an option that is considered at the outset when considering the construction of homes and buildings on the island?

Yes, but as above. It puts a huge amount of risk and cost onto us and we just couldn't add that to our list of risks.

Also, I think it was probably just a typo, but wanted to double-check to make sure I've picked up on it properly, where you say "*It is vastly more expensive to service an pellet boiler than a similar sized pellet one*" did you mean to say a similar sized *oil* boiler?

Yes, correct, I meant oil boiler. And as I said I think, it is the time, the risk, the cost, the lack of trades people, and I could go on... the too narrow window between boats for a service to be carried out in one day, e.g. trades can come over for 2.5hrs through winter and 4hrs max on only one day in summer. We get charged for a full day, and travel to ferry port at double time often, etc and if overnight there is that cost too. Whereas on mainland a plumber might cost £100 or £200 for a one hour planned callout, for us it can easily run to £1000 or much more. An oil boiler can be serviced in 45min, a pellet one can run into hours, if you can find an engineer... etc etc. And to put all our eggs in one basket with a district heating system of any kind, that is asking for big trouble on an island.

Wood stoves of course can break, flue needs cleaned, etc but much of that can be done with less skilled island or local mainland based contractors. The simplicity of a wood stove is a god send for an island. Not sure about semi auto wood fueled systems, maybe there is mileage there if investment is put into that nationally. We don't have any back boilers or etc, on our stoves, they are all just space heaters, but they are a brilliant technology compared to pellet, chip, oil etc which all have too many local or global external costs/risks even if the initial outlay was grant aided.

Thanks

Hi,
I'd like to make some comments on the above Standard to feed into the proposed workshop planned for 06aug which I hope also to attend. This relating principally to the vital need for wood stoves in the long term in rural new builds and other domestic and public buildings, especially in island communities. And this communication provided in my role**[REDACTED - Regulation 11(2)]** IRCT.
IRCT currently own 16 domestic properties on Rum, which is the majority of accommodation on the island. We also own most of the developable land within the Kinloch village boundary. In all of our properties we install wood stoves, including 4 new build RIHF homes (2020). We have also installed oil boilers in all our properties (and PV panels on the new builds). Mowi and NatureScot have also installed oil heating and generally favour woodstoves too. Oil and wood stoves are the standard on Rum. We don't want to use oil, we want to escape from it, but what is the economic alternative? We have spoken to many experts, are very well connected with many other land owning community groups and others experts across Scotland, and have found no alternative to oil, certainly for domestic properties, that doesn't put the lion's share of long term cost and risk onto this fragile community land-owning island Trust and/or individual residents and businesses.
We have no access to the National Grid, our power supply is currently owned by NatureScot which produces electric from two old hydros and diesel backup. The system is ailing and in urgent need of major investment (particularly the hydro pipe, which also supplies all of our domestic water supply). We have over the years experienced significant blackouts. We and NS would like IRCT to play a significant part in ownership of the power system. We are working with them and other partners on managing the inevitable huge risks involved for IRCT in committing to an Energy Company when we ourselves have very limited people energy to commit to such a huge undertaking. It is a long term project. So at present, heat pumps are out, or for very limited experimentation as our supply just can't take it.
We own one pellet boiler which fuels our 20bed bunkhouse. It works well at that scale, but still the risks and costs are on us long term. It is vastly more expensive to service an pellet boiler than a similar sized pellet one, and engineers who will service it few and far between. Oban and now Forres are the most local we have found. That building also has a wood stove backup which provides an important focal point at the heart of the social space. This latter point is surely of huge and real significance I would say for a social animal like humans! It provides a real connection with the island, the planet and each other that no other energy source provides.
Oil is clearly (?) not the future, but wood, for rural areas at the very least, has to be part of it. Locally sourced, available, reliable, sustainable wood. It is the only significant forest product for human use produced from our timber on the island. It provides a small important business or DIY opportunity for some residents. It provides both a social and economic service. Far more healthy perhaps than say a TV as a focus (e.g. there is no TV provision in the bunkhouse, as above)!! Wood supply doesn't rely on ferries or weather. It is relatively clean, affordable and accessible for residents. It is an essential winter back up for when oil or electric supplies fail.
Pollution impact? One study suggested that 75% or our energy footprint on the Small Isles is produced by our ferry, the Loch Nevis. We love having the big ferry. It provides a

lifeline service. It could be vastly better! Faster, more frequent, more reliable and much much more energy and labour efficient. A big task we very much appreciate to turn that Calmac oil tanker around across Scotland's islands. But if reducing our carbon footprint on Rum is the issue, woodstoves must be very well less than 1% of our impact and yet the service they provide is invaluable? Across Rural Scotland, other targets should be our focus and not a restriction on wood stove use. Efficiency of woodstoves, yes, and making them (and wood) more cost accessible to all. Education and support for appropriate storage and the need to use only dry wood. Not coal or coke (also for UK power stations too). These latter suggestions would be a far more positive focus for the very long term, for a progressive Scottish Government, than any restriction on wood stove use.
Thanks. I look forward to the above workshop and discussion on this topic.

[REDACTED - Regulation 11(2)]

Isle of Rum Community Trust
[REDACTED - Regulation 11(2)]

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I have a few bullet points I would like to raise:

1. Firstly, I would like to raise a concern that the New Build Heat Standard, and its announcement has already had a crippling effect on our Industry. Without exception we (Stove installers/ Showrooms/Manufacturers) have experienced a catastrophic downturn in business, which is clearly down to a hasty and ill-informed government policy and statement. My main concerns here are:

    - The lack of consultation with industry to ascertain the evidence for such a ban.

    - The confusing rhetoric and methods for announcing the New Build Heat Standard, which has left the general public with the impression that woodburning is bad for health, not a reasonable solution for space heating and being banned.

    - Little to no knowledge of the changes that have already happened within our industry to clean it up. (Eco – Design / Clear-Skies and Ready to Burn) have made a tremendous impact to emissions.

    - Our Industry employs around 2000 people in Scotland (25,000 across the UK), all with families that will be directly impacted by this. Most installers and showrooms will struggle to survive this year and we will invariably see several companies going out of business. This has been done without any consultation and without any financial aid or discussions to retrain existing competent and qualified staff.

Key Facts- Relating to changes that have already happened:

Modern stoves (Eco-design 2022 compliant) produce up to 90% less particulate emissions than an open fire, and up to 80% less than many older stove models. (Older stove models being classified as closed stoves pre 2001 and stoves that comply with the EN13240 standard introduced in 2001).

Clear Skies 4 and 5 rated appliances (This is an opt in Scheme and testing is paid for by manufacturers- It's not law like Eco- Design) are 15% and 30% cleaner than the Eco- Design standard, which became law in Jan 2022. This meets the European Air Quality targets and exceeds them.

Eco- Design 2022 stoves account for 1.8% of total PM2.5 emissions, when burning dry wood fuel only this reduces to 0.3%.

Eco- Design 2022 stoves will use 1/3 of the total amount of wood fuel required by an open fire to produce 4kW of heat over a 5-hour period.

Eco- Design 2022 stoves operate at efficiency levels of 80-85%, comparable to the most efficient gas boilers and gas local space heaters.

The UK stove industry has been ahead of the curve in addressing emissions, turning on a sixpence with great expense to make the industry as clean as possible. None of this seems to have been considered.

2. We have large rural communities in Scotland – where they rely on woodburning stoves for two main reasons.
    - Powercuts – where the primary heating cannot be used.
    - Fuel Poverty- Where logs can be bought up front and there are no direct debits or unexpected heating bills. Fuel Poverty is also often experienced more acutely in rural areas.
    - We have around 170,000 properties that are off gas in Scotland.

3. Another concern is our reliance on importing energy, in an uncertain political climate across the world, there should be a basic human right to have a heating system- bearing in mind this is almost never the primary heating, to allow for periods of scarcity and conflict.

On a more personal note, I would like to include a short statement that conveys our personal experience and the difficulties we now face:

[REDACTED - Regulation 11(2)]

Murray and McGregor Stoves and Fireplaces Ltd- We were installing heat pumps (air to water), Geothermal and district heating systems 15 years ago across Scotland and North England.

I am still a big renewable energy advocate, but it is not a silver bullet where one size fits all.

We have a diverse housing stock in the UK where heat pumps will not meet the heat demand, there is no single technology that will solve the energy crisis we face. There needs to be an array of solutions available to homeowners and tenants where they can affordably heat their homes.

Murray and McGregor employ 5 full time staff with families, we have 4 seasonal employees with families and a network of specialist sub-contractors such as plasterers, electricians, ames tapers, stonemasons all with families and businesses whom we supply a significant share of their work.

Our overheads as a company are approx. 26k per month, 13k per month of this is salaries. The recent government announcement has had an immediate impact on our business, where we have seen our first month ever in May 2024 since starting to trade where we did no installations. April had a few installations that were booked in March, but post announcement we experienced a complete drop off in new enquiries.

Whilst we are a resilient business, we will as a company struggle to survive this depletion of cashflow into the winter months.

It is imperative that the Scottish Government considers the very real impact to our industry and its' citizens and clarify the position it holds. The general public have considered the recent announcement as a blanket ban, and a sign of things to come which has already had a significant impact to all businesses within our industry.

I would implore the Government to reconsider its stance and immediately set out to consult the industry in order to self-educate and clarify their position on woodburning to lessen the detrimental impact it has already made where a clear strategy around messaging must be made.

It should be noted that woodburning is almost never a primary source of heating a home.

[REDACTED - Regulation 11(2)]
Subject: Todays meeting - NBHS
Date: 30 July 2024 16:34:14

Afternoon
Thanks for the invite today.

Option 3 is best solution for rural Lochaber. **[REDACTED - Regulation 11(2)]**

Option 1 is a non- starter.
In multiple locations my Employer's cannot rely on electricity for their primary heat source.

Eg we designed & built 4 new affordable houses on Rum in 2020 that had to have oil & secondary wood burning stove. - as the local grid cannot generate enough to feed new heat pumps.

Same problem on Eigg, & Eilean Shona. (note HC failure on heat pumps on Eigg cost more than £100k).

Resilience is extremely important in Moidart, Ardnamurchan & Morvern - my private client's all want a log burner as a secondary heat source & I often build projects with 2 or more stoves to meet their needs. (Am pricing a tender today for such a house that also has an ashp.)

Several homes on Eilean Shona are off grid - where was the exemption for off grid homes in the new standard ?

Even when we build brand new Eco Homes with GSHP, Solar PV & solar HW the client's want a stove - it is often rarely used but they know it is there for emergency's. The houses are now so well insulated they need very few logs to raise the temperature to a livable standard for 4+ hours.

To justify option 3 I suggest a 5-10% improvement on u values in the Standards is adopted as a quid pro quo. Extra Insulation is the best option in new housing as it cannot break down & send you a bill.

Our Company has 20 full time site staff (including 4 apprentice joiners) and today we are building 6 separate brand new homes plus major renovations of 2 old houses throughout Rural west Lochaber. All of these are getting heat pumps but all have stoves approved or existing.

The original legislation was not suitable for Rural Scotland & should be amended to option 3.

Note I echo the comment made on grid connections availability & we often build the new houses with only diesel generators as it takes more than 6-12 months to get an electric supply to sites in Lochaber.

[REDACTED - Regulation 11(2)]

S&K MacDonald Homes Ltd
[REDACTED - Regulation 11(2)]

W:www.macdonaldhomes.co.uk