



Date: 12/10/2022

Elmhurst Energy's draft response to:

## New Build Heat Standard Consultation: Part 2

Prepared for: Scottish Government

## Introduction

Elmhurst Energy are pleased that Scottish Government are seeking views on 'New Build Heat Standard (NBHS) Consultation: Part 2' and as such we are delighted to respond to each question in turn.

The consultation asked 11 questions and we have answered them all below. We hope you find the responses considered and useful for taking Energy Efficient Scotland forward in a progressive manner.

Elmhurst have answered the questions from a whole building approach; we are independent of fuels and technologies and therefore have abstained from direct question relating to evidence on particular technologies. We believe that all good proven technologies have a place to play in making Scotland's Buildings more energy efficient and using cleaner fuels.

## Questions and Answers

### **1. Do you agree with the approach set out in 2.1 to regulate direct emissions heating systems in new buildings?**

We agree with this approach. Using the long established national calculation methodologies and Building Standards system is the best way of ensuring only ZDEH systems are installed from 1<sup>st</sup> April 2024.

Focus on heat in buildings is vital however we would like to ensure that other energy demands in buildings are not forgotten. Emissions from hot water generation, ventilation, lighting and appliances will encapsulate a larger proportion of a buildings emissions than space heating in future due to the increasing fabric standards and warmer temperatures. Therefore we do not agree that the DER/TER standard be exempt for buildings with a ZDEH as other high carbon fuels could then be used for other demands, such as water heating, in the building.

In regards to EPC reformatting we have long advocated cost, carbon and energy are given equal prominence on all outputs from the calculation methodologies to drive the required outcomes. We would encourage Scottish Government to complete this work as soon as possible to support the transition to ZDEH systems.



**2. Do you envisage any unintended consequences as a result of this approach? Please provide reasons for your answer.**

It is well understood that the decarbonisation of the grid and electrification of buildings is the right move for achieving net zero targets however the challenges of this move is the likelihood that fuel bills and fuel poverty maybe increased. Ensuring the building as a whole is energy efficient will not only reduce demand on systems but mitigate fuel poverty. We recommend a whole building approach be used to provide a more consistent view and overall improvement to building standards.

**3. Are there any limited, specific situations where the use of bioenergy systems would be required in new buildings?**

No strong opinion

**4. If 'Yes', what do you believe the criteria should be for introducing such an exemption? Please provide evidence to support your answer.**

n/a

**5. Do you agree with the proposed approach to conversions as set out in section 2.3?**

We agree that where a new heating system is introduced into a converted building, only ZDEH systems should be permitted however strongly recommend that the whole building is reviewed for other energy efficiency measures. Fabric first approach should always be prioritised with ZDEH systems.





**6. Do you envisage any unintended consequences as a result of this? Please provide reasons for your answer.**

As per our answer to question 2. The potential for increased fuel poverty by using higher costing fuels within buildings is likely. To reduce this risk, we strongly recommend other energy efficiency measures are implemented to reduce overall energy demand.

**7. What criteria would you use to define the replacement of a direct emissions heating (DEH) system as being 'reasonably practicable'?**

No strong opinion

**8. What criteria would you use to define it as being 'not reasonably practicable'?**

No strong opinion

**9. How might these proposals impact upon people with one or more of the protected characteristics listed in the Equality Act 2010 (for example: a positive, negative or neutral impact)?**

No strong opinion

**10. How might these proposals help the Scottish Government ensure due regard of the three needs of the public sector equality duty (PSED)?**

No strong opinion



**11. Do you anticipate any form of heating within a non-domestic building which will require DEH after 2024? Please provide details of the factors – whether technical, economic or social – which would require DEH after 2024?**

There may be some forms of building that require very high space or domestic hot water temperatures which a ZDEH may struggle to provide.

## Contact Details

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