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Dear Mr McIntyre

Scottish Government – Consultation on Heat and Energy Efficiency Strategies and Regulation of District Heating

Thank you for consulting Historic Environment Scotland on the above. We have the following comments to make on this high-level scoping consultation as part of your evidence gathering on scenarios to regulate district heating and on Local Heat and Energy Efficiency Strategies. Our comments are as follows:

Q1b. We welcome the proposed requirement for local authorities to prepare Local Heat and Energy Efficiency Strategies. Such plans should be linked to the Local Development Plan and where appropriate consideration should be given to the preparation of such strategies at regional scale.

Q2. The scope of the Local Heat and Energy Efficiency Strategies (LHEES) could work as described in the consultation. However, there is little information at this stage on the Scottish Government's expectations of how the phased delivery would be managed. There will also be a requirement for local authorities to have access to the technical knowledge of different existing building types to ensure work does not harm the special interest or character of traditional buildings which may also be listed. It is unclear from the consultation how technical oversight of the performance needs of these buildings will be provided. In particular care needs to be taken to ensure that a one size fits all approach is not taken and it will be important ensure that the delivery of such strategies is without detriment to the historic environment.

Q3. When seeking additional information the Scottish Household Survey may have useful local data about building types. It is important here to recognize the limitations within EPC's concerning certain building types and the consequent likelihood that savings predicted may not be achieved.

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Q4. We welcome the broad principles identified in the consultation document. However, we would reiterate the point in response to question 1 above that the Scottish Government should be satisfied that the regulation of district heating can be achieved without detriment to the historic environment. Technical standards should also apply to the energy efficiency work in section 1 and this should include design, construction, and performance and operation risk as for heating.

Q5-32. Consideration will need to be given to possible impact on listed buildings and in conservation areas for district heating infrastructure.

Q33. Local authorities will also require technical expertise in respect of interventions to traditional buildings and conservation areas under LHEES, many of which may be protected as listed buildings under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. This is potentially a very significant commitment and local authorities will need resources to ensure it is carried out in a thorough way which ensures buildings are considered carefully in terms of their performance.

Q34-37. Historic Environment Scotland has no comments to make on these questions.

Q38. Historic Environment Scotland can provide evidence in the form of case studies and technical papers to help inform the development of the energy efficiency element of LHEES.

I hope the information provided in this response is helpful to you. We look forward to receiving further consultations as the Scottish Government's approach develops.

Yours sincerely,

Historic Environment Scotland