

Response ID ANON-G2CR-PZTN-T

Submitted to Heat in buildings strategy - achieving net zero emissions: consultation
Submitted on 2021-04-30 16:42:26

Chapter 2: A 2045 Pathway for Scotland's Homes and Buildings

1 To what extent do you support the pathway set out for achieving the 2045 net zero target and the interim 2030 target?

Please explain your view:

Scottish Care supports the pathway for Scotland to be net zero by 2045 and have 20% of the volume of gas in the gas grid to be green by 2030. However, the mention of new heat networks consented from 2023 to use heat from low or zero emissions sources, such as surplus or waste heat, or be powered using low carbon or green hydrogen, including via the latest "fifth generation" heat networks is rather soon and input/consultation with larger care and social housing providers is imminently necessary to help forward this agenda.

2 What are your views on any risks of unintended consequences from this pathway?

Please explain your view:

The pathway must take into consideration the urban and rural distribution divide in the context of social care; care homes and housing support settings are not exempt to the higher levels of fuel poverty and the lower energy efficiency of properties that is widespread in rural areas.

Sufficient instruction and guidance accompanying any energy efficiency installations is paramount to ensure that consumers feel confident using their new central heating system after installation. Clear guidance for central heating systems is integral to the comfort levels and running costs of a home – and perhaps even more important in care homes and homely settings where risk assessments are frequently carried out and heating/electrics is a significant issue.

Heating efficiency, improving efficiency, costs and service cover are all areas where consideration to more vulnerable people must be given: energy efficient and effective heating is essential in every home. In care homes and housing situations where the individual is elderly or has certain conditions, the issue of heating can be a matter of life and death.

The wellbeing vs. cost tradeoff will likely be a difficult task for care home and housing support operators. They must continually make decisions that affect the health, safety, and well-being of their residents. Simultaneously, they're resisting financial pressures. Opportunities to improve the residents' standards of living often go directly against desires to reduce spending and heating is no exception. However, favouring one over the other will result in either a poor reputation for the care home and a lack of quality in the care they provide to residents or severe budgeting problems

3 What are your views on our assessment of strategic technologies in low and no regrets areas to 2030?

Please explain your view:

We support the strategic technologies identified in low and no regrets areas and appreciate mention that some properties may be more constrained in terms of technology options available, limited by location and property type, proximity to the gas network, impact on the fabric of historic buildings, space constraints, and capacity of the electricity grid. This may be more evident in older care homes that don't have the capacity to make all the suggested changes.

4 What function should a new heat target serve?

Please explain your view:

A new heat target should be focused on heating efficiency, cost of heating, improving efficiency and service cover.

The Office for National Statistics states that countries with milder winters, like the UK, are less prepared for the cold and tend to have lower thermal efficiency in their homes. When cold weather strikes, their homes are not equipped to keep the cold out. This is also true for care homes, which leaves many older people at risk. However, cold-related deaths may have more to do with the increasing cost of energy. It's becoming more and more expensive, leaving many older adults in fuel poverty. More efficient heating and effective service cover must be the solution to the high costs of heating and electricity in care settings.

Heating efficiency in care homes is the most crucial factor in protecting the residents while staying within budget. Installing energy-efficient boilers, effective wall and roof insulation where possible, and double glazing, will all help keep the heat in. Green energy from solar panels is a further consideration as this would mean heat is wasted to the environment while saving you money in the long run. Most important for care home heating is affordable, effective service cover for boiler(s).

Boiler breakdowns occur frequently in the UK. In an environment such as a care home, they can cause serious health issues. As a result, it is imperative that to prevent such breakdowns. This is done with regular servicing. Boiler service cover from a reliable heating company allows you to have regular boiler check-ups and ensure there are no breakdowns in sight. It also gives access to immediate, emergency servicing should the boiler breakdown. A new heat target should serve to incorporate service cover where greener, more efficient, and cheaper heating systems are installed to keep costs low while the heating stays high.

5 How do you think a new heat target should account for the need to deliver against our statutory fuel poverty targets?

Please explain your view:

N/A

6 Do you agree that a new heat target should apply to heat in buildings, distinct from industrial heat?

Yes

Please explain your view:

Industrial heat is an entirely distinct sector to residential heating systems, therefore targets should be separate

7 What form should a new heat target take and why?

Please explain your view:

A new heat target should explicitly incorporate and consider those that live in care homes and use care and support in homely settings. Going without heating is not an option for care homes as it endangers the lives of many of the older people who live there - particularly those who are also living with other illnesses who are at further risk. Keeping these people safe requires the constant use of effective central heating. The 24/7 operation of care homes means heating adds up to be one of the most significant expenditures, leading to the temptation to cut down on its use. More efficient heating and effective service cover must be part of the new heat target.

8 At what level should the target(s) be set and for what date?

Please explain your view:

N/A

Chapter 3: People

9 What are the most significant actions we can take to ensure that Scotland's people and organisations are meaningfully engaged in the net zero heat transition?

Please explain your view:

Actions should embody the same principles that were outlined in the Net Zero consultation, including engaging with people that live in homely settings in use of care. Older people should not be left out of the conversation; people continue to live healthy and meaningful lives beyond retirement and meaningfully engage with people you must mean all persons.

Engagement must be done with the health and social care sectors with proper framing of the issues by appealing across government sectors. First, we need recognition of the dual impact in social care, i.e., that of provider and workforce as well as those who access care and support. It is important that all members of society feel their voice is accurately included in the development of policy and planning, though we recognise that policy design will incorporate those with expertise in both policy development and in the health and social care field to help ensure that the transition is acceptable and relevant to the community. Second, clear identification of decision-makers that have expertise in engaging with the community is important.

10 What in your view are the opportunities, if any, available to key organisations, such as local government, businesses and trade associations and community or other non-government organisations, in supporting this public engagement activity?

Please explain your view:

Key organisations that support the care sector include suppliers, community organisers, independent sector leads (within Scottish Care) that have in-depth knowledge of regional challenges and variations as it pertains to care, membership and representative organisations such as ourselves, CCPS, the Alliance, among others that represent the voices of the most vulnerable in our society. By supporting this public engagement activity they can continue to best represent and advocate for individuals that use care and support.

11 In your opinion, could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic? (age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief)

Please explain your view:

The proposals as they stand do not unfairly discriminate against persons in Scotland, however we are particularly concerned with certain vulnerable populations - individuals that use care may do so due to older age and therefore have less mobility than they used to, or adults who have a condition or disability which requires them to have additional support. Regardless of the reason for care and support, they are often disenfranchised and have less opportunity to participate in proposals and consultations.

As we age, our ability to control our body temperature declines, as does our ability to feel the cold. This leaves older people at a higher risk of hypothermia during cold weather therefore it is important that proposals take into consideration the most vulnerable in society are protected as heating systems are replaced (among other strategies and proposals).

12 In your opinion could any of the proposals set out in this strategy have an adverse impact on children's' rights and wellbeing?

Please explain your view:

N/A

13 What further action can we take to support people to make informed choices on the energy efficiency and heating options available to them?

Please explain your view:

We support enabling individual choice and autonomy. Whether someone is in a care home or uses housing support, though the heating system type to them may be outwith their control, it should be their choice as to how they use it or in a manner that best meets their needs. Affordable options should be a priority in all settings.

14 What is your view on the current level of support and advice provided through existing services such as Home Energy Scotland and the Energy Efficiency Business Support service?

Please explain your view:

N/A

15 Are there any further suggestions that you could provide on how the customer journey through these delivery services could be improved, in light of the ambitions set out in this strategy?

Please explain your view:

N/A

16 What are the most appropriate steps we can take within our powers to ensure sufficient consumer protection for supported energy efficiency or zero emissions heat installations?

Please explain your view:

N/A

17 Do you have views on whether we should adopt the use of the UK government's TrustMark quality assurance framework?

Please explain your view:

N/A

18 In your view, is there any further action that we, or other key organisations (please specify), can take to protect those on lower incomes, and those in or at risk of falling into fuel poverty, from any negative cost impact as a result of the zero emissions buildings transition?

Please explain your view:

N/A

19 What are your views on our approach to phasing out funding for fossil fuel heating systems by 2024 where it is not detrimental to our fuel poverty objectives? Do you think that this could be achieved any sooner than 2024, and if so how?

Please explain your view:

N/A

20 What changes can be made to the Strategy to help maximise positive impacts and minimise negative ones on people experiencing fuel poverty and other vulnerable groups?

Please explain your view:

N/A

Chapter 4: Place

21 What are your views on how we can support place-based deployment of zero emissions heat within our delivery programmes?

Please explain your view:

Place-based programmes can play a key role in building supply chains and early deployment of integrated solutions, as well as driving post-COVID19 economic stimulus, skills development and job creation across all regions. We can support this within delivery programmes such as through being led by

local and regional authorities, alongside consortia of private sector partners and local enterprise partnerships.

22 What is your view on how best to engage, and support, local communities in the planning and implementation of the heat transition in their area?

Please explain your view:

It is important to have the voices and contribution(s) of those who are directly responsible for managing the health and wellbeing of those living in care homes and in social housing. This may include providers and those who manage the finances and costs, therefore understand what is most feasible and realistic for organisations.

23 What role do you think community anchor organisations could play in supporting the heat transition?

Please explain your view:

Independent, community anchor organisations would be helpful in supporting the heat transition. Local, community-led efforts that understand the needs and abilities of communities would be beneficial in supporting the heat transition.

24 In your opinion, what steps can we take to ensure that policies set out in this strategy do not unfairly impact Island and other remote communities?

Please explain your view:

N/A

25 What is your view on the timescales proposed for Local Heat and Energy Efficiency Strategies (LHEES)?

Please explain your view:

N/A

26 Do you agree with the approach to LHEES we have set out? If not, please give reasons to support this.

Yes

Please explain your view:

We support the provision of a long-term platform for considering local circumstances in developing electricity network plans; while social care has a high level of standards that must be met, implementation can look different in different areas as regions vary greatly in terms of resource and access.

27 What are your views on what Permitted Development Rights might help enable in the heat transition, in addition to those we have already included in the Permitted Development Rights review programme?

Please explain your view:

N/A

Chapter 5: Preparing our Energy Networks

28 In your view, is there further action that can be taken to ensure that our electricity systems are ready for heat decarbonisation? If yes, please provide further information.

No

Please explain your view:

N/A: Not aware of further action at this time

29 What are your views on the changes set out above for the electricity networks and are there further actions by government, the regulator or industry that would make these more cost effective? Please provide evidence to support any suggestions.

Please explain your view:

One of the comments in the consultation about cost concern and who will pay for it and the impact of electrifying heat on consumer (provider) bills that are operating on the fringes of financial viability is significant; thorough cost analyses on both the expected cost and where the funding to support change in homes is needed. While individual incentive might be there, if an organisation cannot afford to upgrade electricity systems then it simply won't happen – even if it cost-saving in the long-run.

30 In your view, what changes are needed to ensure that those least able to pay, including those in fuel poverty, are not unfairly impacted by the transition in our electricity and gas networks?"

Please explain your view:

While the consultation states that it is already in consultation with DNOs and strategic energy leadership groups, close integration with local authorities and organisations that are responsible for delivering support packages to individuals - whether through social security or care support with SDS - must be consulted with and closely involved in processes.

31 What are your views on the changes set out above for the gas networks?

Please explain your view:

N/A

32 Are there further actions by government or industry that you think would make the changes set out more cost effective? Please provide evidence to support any suggestions.

Please explain your view:

N/A

33 What evidence can you provide on the potential for heat networks in Scotland that can help inform a new ambition for deployment within the final Heat in Buildings Strategy?

Please explain your view:

N/A

34 What evidence can you provide on the potential for heat derived from energy from waste to qualify as low or zero emissions?

Please explain your view:

N/A

35 What views do you have on mechanisms to support this and the use of wider sources of waste heat?

Please explain your view:

N/A

36 With the sustainable market for heat networks described above in place by the early-2020s, are there any further gaps that must be filled to support subsequent delivery of heat networks? If so, what are these and are there particular types of organisation that would be key in filling these?

No

Please explain your view:

N/A

Chapter 6: Kick-starting investment in the transition

37 What are your views on the range of actions identified above to kick start the investment in the transition over the next 5 years?

Please explain your view:

We would welcome sector-specific engagement to kick-start the investment in the transition over the next 5 years.

38 Do you agree with the strategic funding priorities we have set out?

Yes

Please explain your view:

The priorities – specifically that of Net Zero leadership showcased and share learning through early adoption in key areas is something that is an effective tool to highlight good practice and areas of opportunity and something we do within Scottish Care - we share 'feel good' stories and share learning and development which ultimately supports best practice and improved, collaborative leadership.

39 In your view, should equal funding be allocated across these priorities or should certain priorities be weighted in terms of impact for Scotland?

Please explain your view:

Some of the priorities necessitate more immediate attention – primarily in priorities 1 and 3 with focus on those least able to pay and showcasing net zero leadership. With regard to the independent care sector – which is majority SMEs – encouraging early action and as a catalyst for other organisations in wider society to follow-suit would be helpful. The continued investment into the strategies may continue to update/change over time. As innovation develops, funding follows.

40 What are the opportunities and challenges we face in maximising our £1.6 billion investment?

Please explain your view:

We anticipate possible challenges with care homes and housing support accessing funding especially as social care is not prioritised to the same degree that health (i.e. NHS Scotland) is. It must be explicitly clear in who you seek to help in the social care sector and understand how people use/uptake that support.

41 What are your views on the role of government funding over the next five years? For example, should it be focused towards significant increases in the volume of renewable heat and energy efficiency measures installed or more targeted at specific priority groups or technologies?

Please explain your view:

N/A

42 What are your views on how we can use our funding to leverage and encourage private sector and other forms of investment?

Please explain your view:

Investment must be clearly explained as an investment and not a cost. There may be challenges in encouraging investment that goes towards care homes and housing support, due in part to the way society doesn't hold social care to the same status as healthcare. However, we all know someone who will use care at some point in their life and it must be an important point of consideration for private sector investment.

43 What are your views on the effectiveness of our existing delivery programmes in supporting different client journeys, including for those in or at risk of fuel poverty? (for example, landlords, home owners, non-domestic building owners – public and private, domestic and non-domestic tenants). In your opinion, are there any gaps in support?

Please explain your view:

We are aware that some small care home providers have accessed the SME Loan Scheme and Cashback to introduce energy efficient heating systems. Scottish Care has been raising awareness of the support, but only found out about it recently. We would welcome early engagement with the sector to work on a sector-specific programme of support.

Currently, there is no disaggregation of health and care data on CO2 emissions which means that we can neither identify nor benchmark the extent to which there is impact from the sector. However, Health Care Without Harm estimates that measuring the greenhouse gas emissions solely related to heating and cooling the worlds healthcare providers (using the WHO definition of healthcare providers which includes social care), would make it the fifth-largest contributor in the world. This information is just once example of the impact that social care should be a key consideration in the net zero discussions and getting investment into the sector that promotes a sustainable and green future with the health and wellbeing of individuals at the centre of it all.

Improved partnership working (i.e. closing the 'implementation' gap) is needed to support where there are gaps in social care representation, especially with those who are responsible for ensuring whether funding is equally distributed for those who need support.

Our manifesto details our key priorities in the sector for the next Parliament with specific reference to sustainability can be found here:

<https://scottishcare.org/scottish-care-manifesto-2021/>

44 Is there any action we can take to further tailor our support to meet the ambitions set out in this strategy, including in relation to fuel poverty? (Please include any evidence you may have to show what this might achieve).

Please explain your view:

N/A

Chapter 7: Working Towards A Long-Term Market Framework

45 What are your views on the approach outlined above to take action towards a long-term market framework for net zero emissions in buildings?

Please explain your view:

N/A

46 What are your views on how we can achieve a fair and equitable cost distribution for the net zero transition, including ensuring we tackle fuel poverty?

Please explain your view:

N/A

47 What financing mechanisms are needed to encourage investment from householders, businesses and the private sector?

Please explain your view:

N/A

Chapter 8: Developing a Regulatory Framework for Zero Emissions Buildings

48 What are your views on the regulatory actions set out in the proposed regulatory framework?

Please explain your view:

We support regulation that is proportionate and considers the health and wellbeing of Scotland's people. Further, delivery support where there is a clear path of support and advice for all those affected by the transition process is integral.

Regulatory bodies in the social care sector – such as the Care Inspectorate and the SSSC – have their own quality frameworks that draw upon Health and Social Care Standards and are designed to understand the impact of services that they provide upon groups that receive care and support and to identify best practice and areas for development. Quality frameworks might be of use in the transition process as the impact and outcomes of those most affected depend upon the processes that make up the work of services involved in the transition process and the vision/leadership of the services.

49 What are your views on the timeframes for the application of the regulation we have set out?

Please explain your view:

N/A

50 Alongside our regulatory approach, we are developing our delivery programmes to support the acceleration towards net zero emissions for buildings (as set out in Chapter 6: Kick starting investment in the transition). What are your views on how our delivery programmes could support compliance with regulation?

Please explain your view:

As mentioned in chapter 7, the impact that the social care sector contributes towards emissions is not fully known, but estimates point towards healthcare (which includes social care) as one of the greatest contributors to greenhouse gas emissions in the world.

For care homes and housing support, there are many options that providers have been implementing for over a decade – better insulation, water and lighting efficiencies such as eco taps and aerators, and LED lighting installed where they meet the expectations of creating a homely environment and require meeting regulations. Design affects the widest definitions of the environment. Structural change is of course more difficult if you have an older property, as to retrofit can present challenge and cost. However, as some of these changes are cost saving in the longer-term, they may also be financially worthy of investment. Whilst access to such resource can be compromised because of the prolonged underfunding of the sector, it is clear that issues of environmental sustainability are just as important for our Commissioning Authorities as for providers and staff and the sector is willing to do the work. They should be consulted with on supporting compliance with regulation as they are already doing it.

51 What other mechanisms/support may be required to ensure that regulation is fair and equitable for all?

Please explain your view:

N/A

Chapter 9: The Economic Opportunity

52 What are your views on the plans set out to maximise the economic benefits to Scotland from the heat transition?

Please explain your view:

N/A

53 What role could technology-specific milestones play in supporting supply chain development, and how should these milestone levels be developed?

Please explain your view:

N/A

54 Is there anything further that can be done to ensure that Scotland realises the economic opportunity available from the heat transition?

Please explain your view:

N/A

55 What more can be done to support the development of sustainable, high quality and local jobs in the heat and energy efficiency supply chain across the breadth of Scotland?

Please explain your view:

N/A

56 In your view, what are the opportunities and constraints presented by the role of the wider public sector in maximising the economic benefits to Scotland?

Please explain your view:

N/A

57 In recognition of the skills consultation, published alongside this strategy, what further action can be taken to support skills development in Scotland over the lifetime of this strategy?

Please explain your view:

N/A

58 Are you aware of any barriers to the reskilling of existing oil and gas heating engineers to equip them to install low and zero emission heating?

Please explain your view:

N/A

59 How can we support the development of more opportunities for young people?

Please explain your view:

N/A

Chapter 10: Working with the UK Government

60 To what extent do you agree that the issues identified must be addressed jointly by the UK and Scottish governments to unlock delivery in Scotland?

Please explain your view:

In a sector that works in both a devolved capacity from the UK government and in collaboration in other areas, it is important that any issues towards legislative action and implementing delivery be done at the earliest opportunity to prevent roadblocks down the line.

61 Are there any further areas where joint action is required? For example, to ensure no one is left behind in the transition and fuel poverty is addressed.

Please explain your view:

N/A

Chapter 11: Monitoring, Evaluation and Future Decision Making

62 Do you agree with our proposals for a monitoring and evaluation framework? If not, please state your reasons and suggested improvements.

Yes

Please explain your view:

63 What are your views on how lessons learned from heat and energy efficiency policy and programmes should be shared with the sector and key stakeholders to ensure that Scotland benefits from the public investment outlined above?

Please explain your view:

Refer back to the good practice examples and clear examples where costs are being saved and efficiency is improved.

64 Finally, is there any other information you would like to provide us with that is relevant to the development of Scotland's Heat in Building Strategy?

Please explain your view:

The Social Care Institute for Excellence has guides on co-production in social care and details how to develop co-productive approaches to working with people who use services and carers e.g., working with the People led Policy Group at inclusion Scotland on Adult social care reform: <https://www.gov.scot/groups/adult-social-care-reform-people-led-policy-panel/>. It is one of the ways of making sure that the views, experiences and expertise of people who use social care support are at the heart of decisions that are made.

Environmental Report

65 What are your views on the accuracy and scope of the information used to describe the Strategic Environmental Assessment (SEA) environmental baseline set out in the Environmental Report?

Please explain your view:

N/A

66 What are your views on the reasonable alternatives set out in the Environmental Report?

Please explain your view:

N/A

67 What are your views on the predicted environmental effects as set out in the Environmental Report?

Please explain your view:

N/A

68 What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

Please explain your view:

N/A

General questions

69 Is there any further information you wish to provide on the content set out in this draft Strategy?

Please explain your view:

N/A

70 Is there anything you would like to highlight about the role, opportunities for and constraints of, specific types of organisation (such as local government, other public sector, trade associations, individual business organisations, charities, environmental organisation, community groups) in contributing to the transition to zero emissions buildings, in particular over the next five to ten years?

Please explain your view:

N/A

About you

71 What is your name?

Name:
IMOGEN CAIRD

72 What is your email address?

Email:
imogen.caird@scottishcare.org

73 Are you responding as an individual or an organisation?

Organisation

74 What is your organisation?

Organisation:
Scottish Care

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

Publish response with name

76 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

77 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