

A002 – Heat networks

Response ID	Respondent
12	Ms Elisabeth Richie
14	Scottish Water
15	Newtonhills, Muchalls and Cammachmore Community Council
20	Stonehaven and District Community Council
23	Inverurie Community Council
25	Kemnay Community Council
38	SEPA
50	Bancon Developments
61	The Scottish Government

1. Issues

A number of the respondents expressly supported the proposals in the Main Issues Report addendum (15, 20, 23, 25, 35, 61). Newtonhills, Muchalls and Cammachmore Community Council and Stonehaven and District Community Council identified that this support was despite the fact that its application would likely give rise to huge problems, delays and costly disputes (15, 20). Specific opportunities for heat capture should be made in the Strategic Growth Areas, areas where there is existing fuel poverty and in the eastern Cairngorm outliers (where geology suggests accessible “hot-rock” granite deposits) (61) More detail on the policy was requested (23).

SEPA, in their support for the proposal also recommended that the policy applies to all types of development, both big and small (38) while the Scottish Government advocated express consideration of heat networks in off gas grid locations and close to distilleries where waste heat is provided. (61)

Only one house-builder responded on this topic suggesting that the policy went too far and should only be required in locations where existing sources of heat were currently known. Bancon Developments further argued that the preferred option is too prescriptive in requiring all major developments and some smaller ones to carry out studies on the feasibility of the provision of heat networks, especially when connection to a heat network is not a mandatory requirement. The obligation should only apply to master-planned areas (50).

2. Actions

The support and lack of substantial adverse, comment from the construction industry for the proposals is welcoming. Newtonhills, Muchalls and Cammachmore Community Council and Stonehaven and District Community Council are correct in noting that this will probably be a difficult policy to implement, but as it arises directly from Scottish Planning Policy and has a measure of explicit support from the Scottish Government we will have to accept this inevitability.

As recommended in the “Heat” position paper we should also recognise specific areas of need for heat (i.e. areas of fuel poverty) and other specific areas (such as in the Strategic Growth areas and off gas-grid areas) where the policy will have the greatest benefits. Proposals for hot-rock geothermal energy do not require a policy response at this time as the proposed supplementary guidance SG Climate change 6 “other renewable energy developments provides sufficient context for decision makers.

The recommendation by SEPA that all developments are required to consider the feasibility of creation or connection to a heat network is accepted. Suggestions that this is an onerous requirement are not accepted, but to foster greater understanding a proportionate assessment will be sought. No persuasive argument has been presented that major developments (more than 50 houses) should not provide infrastructure for future heat network provision. Bancon Developments are reminded that there is already a “mandatory requirement” from existing policies to require new development to deliver a substantial element of CO₂ reduction in new development. Explicit consideration of heat networks is one way in which such a reduction can be achieved.

3. Committee Recommendations

The Main Issues Report addendum proposal for an indicative map of heat demand and supply will be taken forward, embracing issues of fuel poverty, gas-grid and the opportunity provided by major developments as elements of demand and known industrial heat sources and hot-rock opportunities as indicators of supply.

Use of heat networks will be introduced at a number of points in the plan:

- A specific plan-wide requirement for heat network infrastructure for major developments will be introduced to the plan's policy on "Resource use in buildings"
- It will be noted that the "energy statement" required by supplementary guidance Climate change 1 "Carbon neutrality in new developments" will be required to demonstrate whether creation or connection to a heat network is a feasible means of achieving the CO₂ reductions required by that policy.
- This will be and supported by text in SG Climate change 1 "Carbon neutrality in new development" that requires provision of appropriate on-site infrastructure to allow economic future connection to heat networks:

In the case of all major multi-building residential, mixed use, retail, commercial and employment developments an assessment of the feasibility of achieving these standards, in part, through a district heating scheme will be required. As a minimum all major developments must include appropriate infrastructure from the edge of the development site to a location adjacent to the rising main of each property to allow for the future installation of metered heat. Settlement statements identify other development sites which due to proximity to existing heat sources should also be developed with a view to exploiting waste heat.

In areas not served by mains gas, consideration should be given to biomass or hot-rock geothermal sources as a means of achieving these standards.

- It will be included as a specific consideration required for all developments through amendment to supplementary guidance 2 "Layout, siting and design of new development".