

28 April 2020

TO: National Planning Framework 4 Team
Scottish Government Area 2F South
Victoria Quay
Edinburgh
EH6 6QQ
* DELIVERED VIA EMAIL to scotplan@gov.scot *

RE: Submission to the Scottish Govt consultation on the development of National Planning Framework 4

Dear NPF4 Team,

Inverurie Community Energy Society Ltd (ICE) was registered in August 2018 with the Financial Conduct Authority as a Community Benefit Society. This was done to take advantage of the offer of residual heat from a proposed Energy from Waste facility within the community by creating a district heating scheme.

In setting out on this journey, ICE have become aware of the significant extent of the development of district heating programmes throughout northern Europe and look to Denmark as an inspiring example.

There are a considerable number of district heating projects in Scotland and the rest of the UK but many of these are small in scale and distinctly separate, and not standardised as an industry. We are in the very early stages of our proposal and have become increasingly aware of the absence of acknowledgement of the important role that district heating can play and of support for new developments, both at local and national level.

In recognition of the above ICE would respectfully submit the following observations and comment for consideration in the development of the draft of NPF4.

Kind regards,

George Niblock

Chairperson, Inverurie Community Energy Society Ltd

- 1 District heating projects if developed on a similar scale to Denmark can play a significant role in tackling a number of the Scottish Government's current priorities such as: fuel security, fuel poverty, fuel efficiency, sustainable energy, carbon reduction and protection of Scotland's resources. Accordingly, to stimulate the development of district heating across Scotland NPF4 should contain a requirement, where appropriate, that new housing developments above a certain size be required to be supplied with a district heating network, a communal heating scheme or low-carbon and low-cost heating technologies. This could have similarities with the SUDS requirements. We have no specific recommendations in respect of the size of development that would trigger such a requirement but would suggest that it be set at as low a level as possible rather than the opposite.
- 2 The success of the development of district heating networks across Scotland will also be dependent on the level of uptake of provision. While it may be relatively straightforward to require new developments to participate, the situation with existing heat users with individual installations may not be so easy without a substantial price differential and even then, dependent on level and cost of upheaval for implementing measures such as district heating. NPF4 should give consideration to how it might be able to facilitate/encourage retrofit in such circumstances.
- 3 It is already recognised that Land-use Planning and Environmental regulatory controls have to work in synchrony. In that regard, we would recommend that the intentional and consequential venting of heat to atmosphere should be restricted in all new developments. The limits for that should be set at as low a level as possible. The change should also be used to signal the potential for retrospective introduction of such requirements starting with the largest installations.
- 4 Many facets of modern society such as gas; electricity; water; sewage; telecommunications have requirements for above and below ground infrastructure particularly within the urban environment. District heating networks are no different and the infrastructure needs should be recognised on a similar basis. Provision for this should be recognised within Structure and Local Development Plans. Additionally, and of particular importance given Scotland's current low level of provision, recognition should be given to the need to retrofit such infrastructure within mature urban environments.
- 5 The Heat Networks Scotland Bill is being considered by Scottish Government at present and when this becomes statute, the district heating industry will be conveyed with similar rights of servitude as other utilities. This should be recognised and taken into account whilst finalising NPF4