

Local Heat and Energy Efficiency Strategy

Formal Consultation Report

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1. INTRODUCTION

The Council has engaged with stakeholders throughout the LHEES development process. In addition to the actions described in the main strategy document, the Council ran a formal consultation process to gather feedback on the draft documents. This report provides detail on the formal consultation process (Section 2), summarises survey responses (Section 3) and outlines the main points of feedback received and changes made to the final documents (Section 4). A copy of the consultation questions is provided at the end of the report (Section 5).

2. FORMAL CONSULTATION PROCESS

The formal consultation process on the draft Local Heat and Energy Efficiency Strategy and Delivery Plan was carried out between 29th January and 8th March 2024. The draft LHEES documents set out the proposed vision, priorities, scope and proposed delivery actions.

A Communications and Social Media plan was developed to shape the consultation process which followed the steps outlined in the LHEES guidance:

- **Identify** the key stakeholders to engage in the LHEES.
- **Map and Analyse** stakeholders to understand their level of interest and influence in relation to LHEES and prioritise engagement. This stage also includes identifying the appropriate level of participation of each stakeholder¹.
- **Plan** key engagement activities across the LHEES process.
- **Engage** stakeholders, continuously monitoring and recording engagement, making updates as new stakeholders are identified.



A number of methods of engagement were used during the formal consultation period:

- LHEES consultation survey – a consultation survey on the draft LHEES was hosted on Citizen Space.
- LHEES consultation video – we produced a promotional video to support the LHEES consultation and promote engagement.
- Stakeholder contact – stakeholders were contacted with information on the draft LHEES and a link to the LHEES consultation survey. This includes community councils and area partnerships.
- LHEES webpage – a webpage on LHEES was created which provides information on the LHEES and a link to the consultation on Citizen Space.
- Social media posts were published regularly to encourage people to read the draft LHEES and respond to the consultation questions.
- An elected member quote and press release was published to further raise awareness and promote engagement in the LHEES consultation.
- Ongoing engagement was carried out with RSLs and other key partners including the Police and Fire Service.

¹ The levels of participation reflected the [IAP2's Spectrum of Public Participation](#) i.e. "Inform, Consult, Involve, Collaborate, Empower".

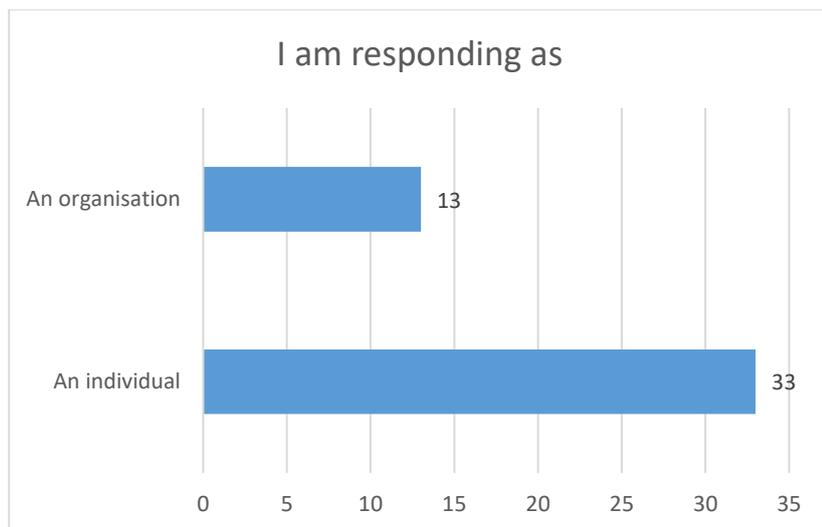
3. SUMMARY OF CONSULTATION RESPONSES

This section summarises responses received to the online consultation survey hosted on Citizen Space which ran from 29th January to 8th March 2024. This was accessible via the following link https://scotborders.citizenspace.com/housing/lhees_consult_2024.

Responses to this survey: **46**

3.1. I am responding as:

There were 46 responses to this part of the question.



Option	Total	Percent
An individual	33	71.73%
An organisation	13	28.26%
Not Answered	0	0.00%

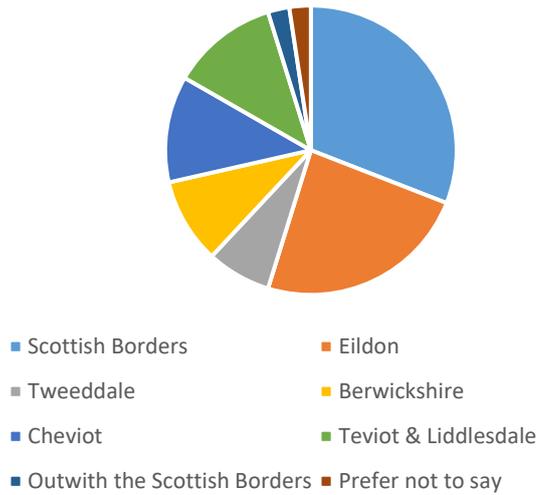
If you are responding as an organisation, provide the name of the organisation:

There were 8 responses to this part of the question.

3.2. Where are you or your organisation based?

There were 43 responses to this part of the question.

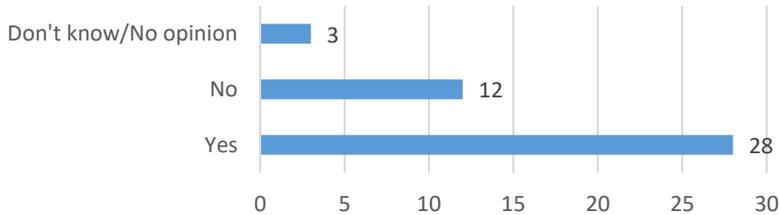
Where are you based?



3.3 Does the LHEES Vision present a clear aim for the heat and energy decarbonisation transition in our region?

There were 43 responses to this part of the question.

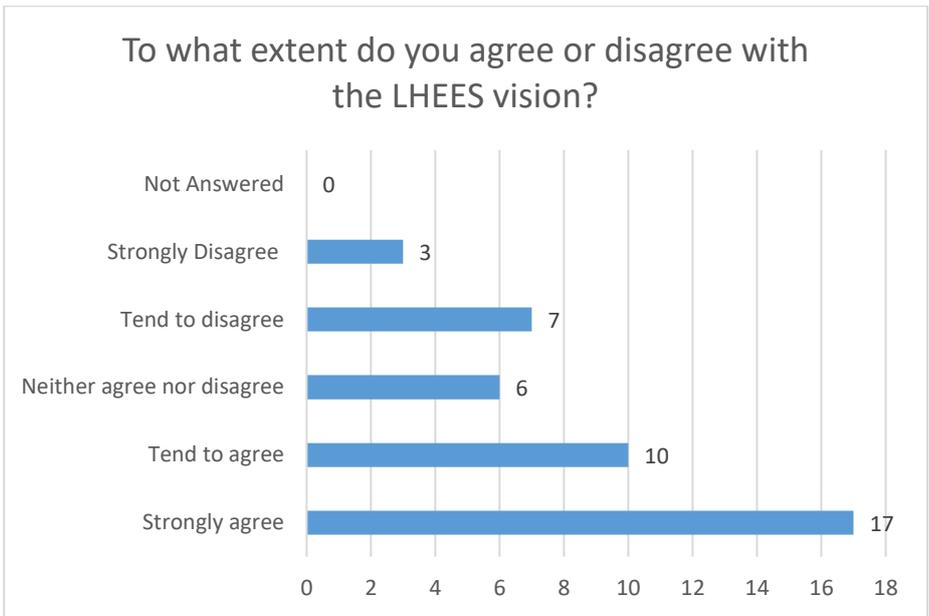
Does the LHEES Vision present a clear aim for the heat and energy decarbonisation transition in our region?



Option	Total	Percent
Yes	28	65.11%
No	12	27.90%
Don't know/No opinion	3	6.97%
Not Answered	0	0.00%

3.4 To what extent do you agree or disagree with the LHEES vision?

There were 43 responses to this part of the question.



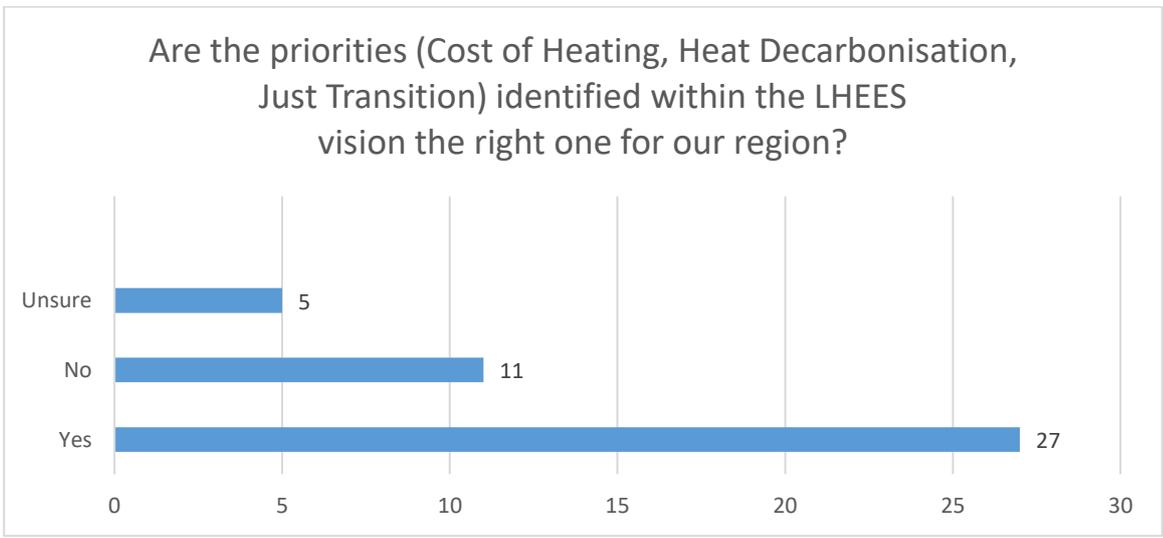
Option	Total	Percent
Strongly agree	17	41.46%
Tend to agree	10	24.39%
Neither agree nor disagree	5	12.19%
Tend to disagree	6	14.63%
Strongly Disagree	3	7.31%
Not Answered	0	0.00%

Please share any comments on the Vision:

There were 26 responses to this part of the question. Please refer to the end of this report for a summary of comments and emerging themes.

3.5 Are the priorities (Cost of Heating, Heat Decarbonisation, Just Transition) identified within the LHEES vision the right one for our region?

There were 43 responses to this part of the question.



Option	Total	Percent
Yes	27	62.79%
No	11	25.58%
Unsure	5	11.62%
Not Answered	0	0.00%

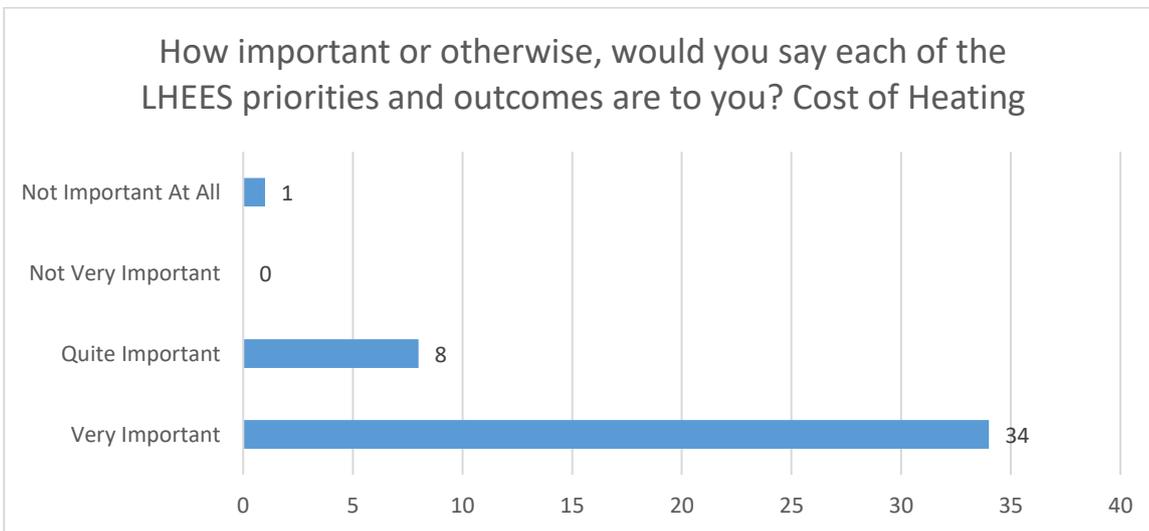
Please let us know if any other priorities should be considered:

There were 20 responses to this part of the question.

3.6 How important or otherwise, would you say each of the LHEES priorities and outcomes are to you?

Cost of Heating

There were 43 responses to this part of the question.

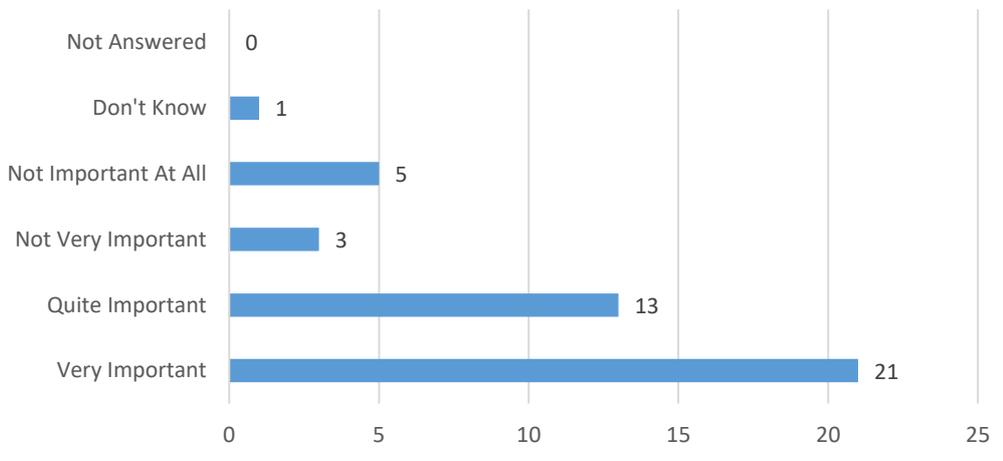


Option	Total	Percent
Very Important	34	79.07%
Quite Important	8	18.60%
Not Very Important	0	0.00%
Not Important at All	1	2.33%
Don't Know	0	0.00%
Not Answered	0	0.00%

Heat Decarbonisation

There were 43 responses to this part of the question.

How important or otherwise, would you say each of the LHEES priorities and outcomes are to you? Heat Decarbonisation

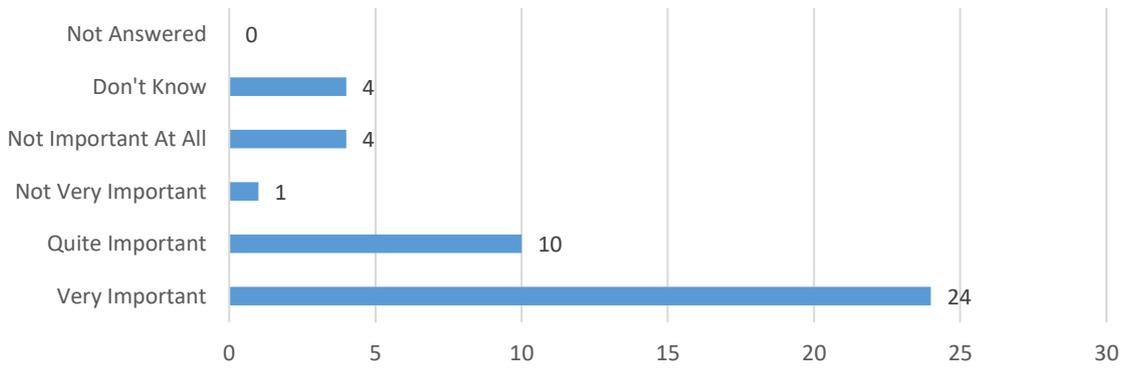


Option	Total	Percent
Very Important	21	48.84%
Quite Important	13	30.23%
Not Very Important	3	6.98%
Not Important at All	5	11.63%
Don't Know	1	2.33%
Not Answered	0	0.00%

Just Transition

There were 43 responses to this part of the question.

How important or otherwise, would you say each of the LHEES priorities and outcomes are to you? Just Transition

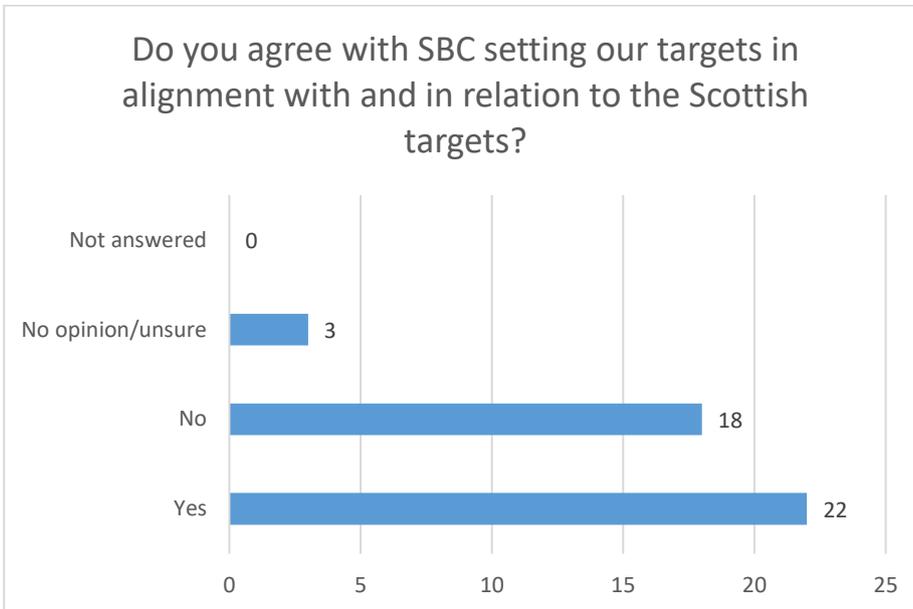


Option	Total	Percent
Very Important	24	55.81%
Quite Important	10	23.26%
Not Very Important	1	2.32%
Not Important at All	4	9.30%
Don't Know	4	9.30%

Not Answered	0	0.00%
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3.7 Do you agree with SBC setting our targets in alignment with and in relation to the Scottish targets?

There were 43 responses to this part of the question.



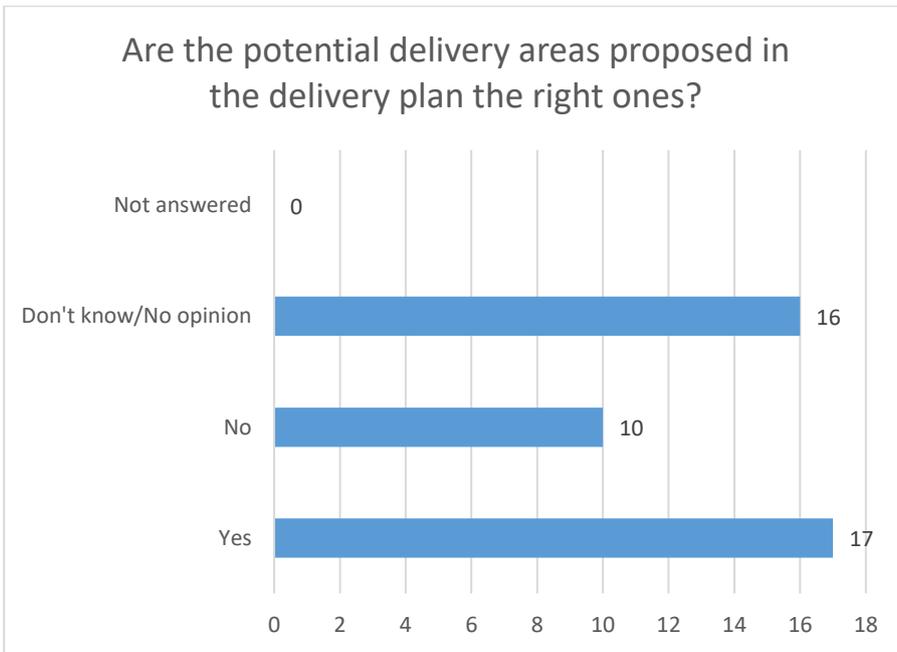
Option	Total	Percent
Yes	22	51.16%
No	18	41.86%
No opinion/unsure	3	6.98%
Not Answered	0	0.00%

If "No", how could they be changed?

There were 21 responses to this part of the question.

3.8 Are the potential delivery areas proposed in the delivery plan the right ones?

There were 43 responses to this part of the question.



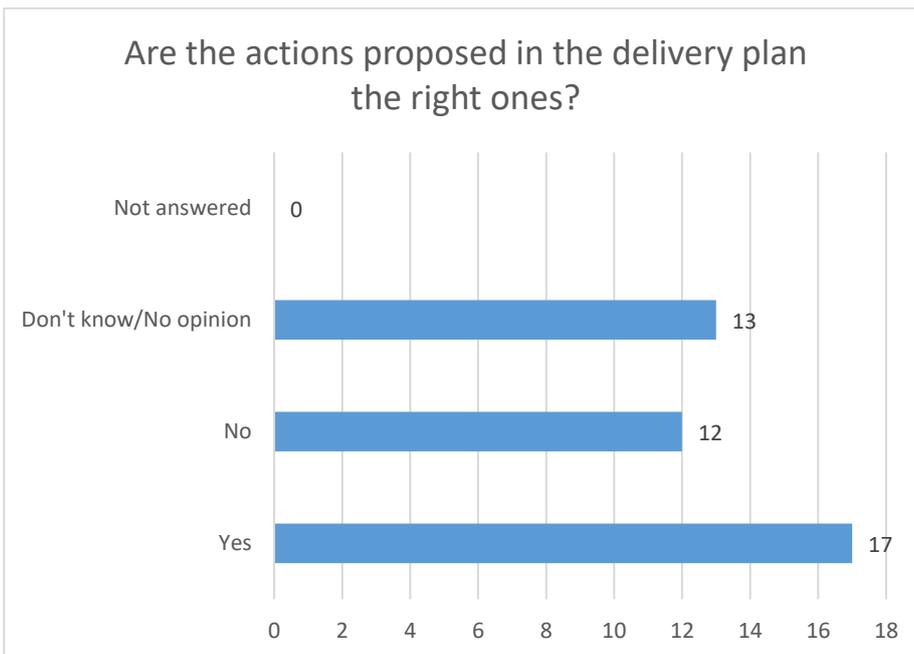
Option	Total	Percent
Yes	17	39.53%
No	10	23.26%
Don't know/No opinion	16	37.20%
Not Answered	0	0.00%

If you have some suggestions for the potential delivery areas, or comments, please specify:

There were 19 responses to this part of the question.

3.9 Are the actions proposed in the delivery plan the right ones?

There were 42 responses to this part of the question.



Option	Total	Percent
Yes	17	40.48%
No	12	28.57%
Don't know/No opinion	13	30.95%
Not Answered	0	0.00%

If you have some suggestions for actions, or comments, please specify:

There were 18 responses to this part of the question.

3.10 What major barriers would stop us delivering the LHEES?

Please specify:

There were 36 responses to this part of the question.

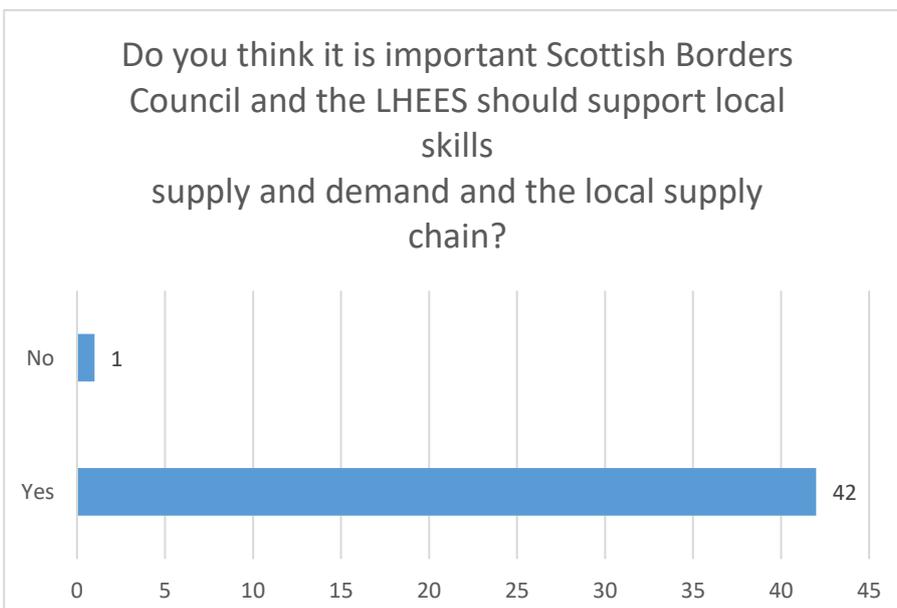
3.11 What action or actions do you think you or your group/organisation can take to contribute towards meeting the Scottish Borders Local Heat and Energy Efficiency Strategy vision and priorities?

Please specify:

There were 27 responses to this part of the question.

3.12 Do you think it is important Scottish Borders Council and the LHEES should support local skills supply and demand and the local supply chain?

There were 43 responses to this part of the question.



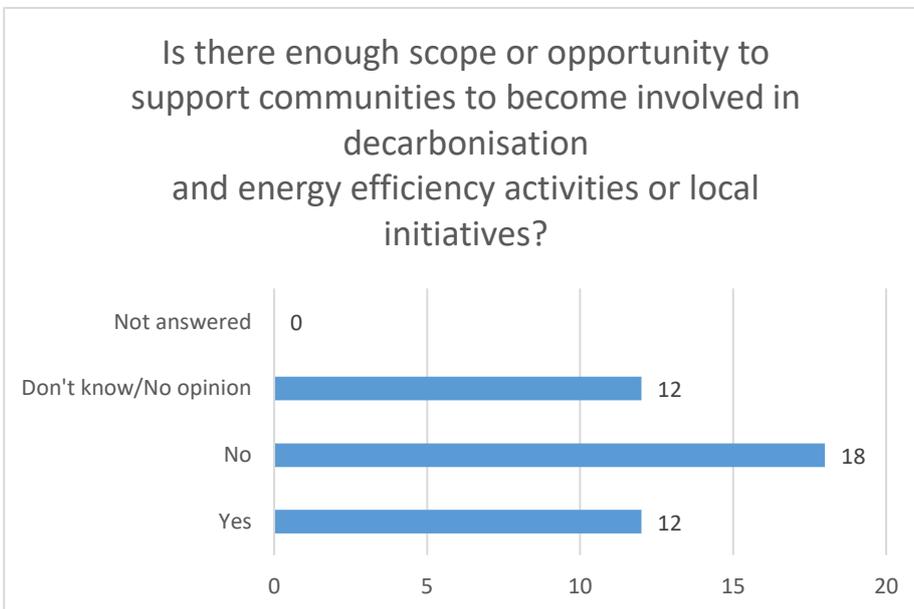
Option	Total	Percent
Yes	42	97.67%
No	1	2.33%
Don't know/No opinion	0	0.00%
Not Answered	0	0.00%

Please specify:

There were 13 responses to this part of the question.

3.13 Is there enough scope or opportunity to support communities to become involved in decarbonisation and energy efficiency activities or local initiatives?

There were 42 responses to this part of the question.



Option	Total	Percent
Yes	12	28.57%
No	18	42.86%
Don't Know/No Opinion	12	28.57%
Not Answered	0	0.00%

Please specify:

There were 23 responses to this part of the question.

3.14 What additional comments would you like to share about the Draft Local Heat and Energy Efficiency Strategy and Delivery Plan?

Additional comments

There were 27 responses to this part of the question.

Comments and Emerging Themes

A number of themes emerged from the commentary provided by respondents, comments have been extracted and grouped as follows:

Concerns regarding the cost of implementing the LHEES –

“The cost of implementing this for the low income families will mean a lower standard of living.”

“I am concerned that in its haste to achieve carbon reduction individual households will be compelled to install potentially inadequate and expensive electric heating systems.”

“Putting in a district heating system will cost millions...!”

“Priority should be to ensure all new heating systems will definitely provide adequate heating to ensure that all households are warm and that the cost of doing so will be affordable.”

“Housing stock in the Borders is not constructed to be able to maximise the use of other alternative heating effectively or efficiently without a huge amount of investment.”

“New energy efficiency measures and the installation and maintenance of new clean heating systems will require significant investment on the part of RSLs, who are already facing rising costs and reduced budgets.”

Concerns around infrastructure capacity –

“The electricity supply infrastructure must be built first.”

“Current alternative energy solutions are not fit for purpose as the infrastructure isn't there to support them.”

“The vision is hampered by repeated power cuts. A crucial aim should be to provide underground power protected from wind, trees, and the extreme weather conditions we can experience.”

“I am concerned that the local grid would be unable to provide sufficient or reliable power should all households convert within the specified timescales.”

Rurality and associated issues –

“Is there something more we should be doing as a rural area to impact on people’s lived experience locally?”

“We’re more rural, we have older buildings and a high percentage of listed buildings and conservation areas...”

“If over 20% of the dwellings in the Scottish Borders are either listed or in a conservation area then planning has to change to be able to accommodate insulation measures as well as installation of solar panels and heat pumps for these homes.”

“Supply chain and labour [is a barrier to delivery in the Scottish Borders]”... [We need] “a local supply chain to be able to deliver at capacity”.

4. SUMMARY OF CHANGES

This section presents a summary of the changes made as a result of the feedback and comments received.

Comment/Feedback	Document	Change
Further clarity is required on delivery areas, including selection criteria.	Delivery Plan	This has been incorporated into the final document, with an additional comment that other delivery areas could be considered in future iterations of the “living” document.
More information requested on the consultation process and how the Council will review and address responses.	Strategy	The final documents and this document seek to address this comment by summarising the consultation and our response to individual feedback.
Strategic Zones - more detail is required for recommendations & how these link to LHEEDP.	Strategy	Section 9 - Strategic Zones identify areas with the highest concentration of priority being assessed. Further detail has been added.
More information is required on energy efficiency interventions (what they are, challenges to implementation).	Strategy	Added into glossary.
Identifying gaps in Delivery Plan actions would be useful (could link to additional support required)	Delivery Plan	New section on funding added and detail on challenges provided throughout.
It would be useful to develop a longer term pathway for Delivery Plan (e.g., up to 2028).	Delivery Plan	Longer term projects will be adopted as delivery plan develops. The current delivery plan covers the next five year period.
Higher resolution maps are needed to identify strategic zones more clearly.	Strategy	Better quality maps have been provided.
NPF4 should be included as it refers to the reuse of (vacant) historic buildings	Strategy	Reference included.
Include relevant HES Guidance for Historic Buildings: https://www.historicenvironment.scot/advice-and-support/your-property/saving-energy-in-traditional-buildings/ https://www.historicenvironment.scot/about-us/what-we-do/climate-change/climate-action-plan/	Strategy	Included.
Expand on historic buildings, emphasizing the critical Fabric First approach.	Strategy	Included.
Include definition of Retrofit in Glossary.	Strategy	Included.

It would be useful to reference the need to develop locally available skills/knowledge/supply chains relevant to traditional building construction.	Delivery Plan	Added into supply chain section - including traditional skills.
National grid limitations should be mentioned (peak times, infrastructure planning in Strategy, what sources available if mass power outages occur, similar issues to EVs).	Strategy	We have included reference to working with SPEN/SE and energy companies/utilities and to ensure that considerations around constraints/wider plans are part of the ongoing process.
Inclusion of shorter/medium term priorities to support households/rural areas would be helpful.	Strategy	SBC / LHEES will look to do this as part of ongoing activity such as EES:ABS or other activities which has always looked at rural areas to support. Recent ASHP projects have been identified in remote/rural areas such as Greenlaw, Gordon.
Ensure individual responsibilities for costs are made clear as well as funding available.	Strategy	Section on funding added.
How can Public Health support with evidence relating to health inequalities/wellbeing in relation to drivers of fuel poverty - not mentioned until p. 27 - more inclusion from outset - impacts all areas of life - outlined within HIIA information - Council could use this to contextualise strategy too.	Strategy	Further detail has been added to contextualise strategy and make links between the Council's ambitions and the link between fuel poverty and wellbeing/health.
Ensure compatibility with fuel poverty targets - especially to mitigate unintended consequences e.g., smart meter access.	Strategy	This is addressed in the fuel poverty section.
Extra support highlighted for off gas and rural locations.	Strategy	Off gas and rural is its own consideration within the LHEES. Also these areas are at risk of higher fuel poverty/poverty.
Support is needed for housing outside of delivery areas/heat network zones.	Strategy	We have been required to set initial delivery areas. However, this does not mean areas outside are not in scope. We will continue to work with RSLs on projects or opportunities regardless of delivery area.
A deeper dive is needed into data/further analysis to filter data between owner occupied/social housing to better support delivery areas.	Strategy	This will be a future action.
Draw out outputs more clearly to understand challenges/opportunities/next steps - sensible to split by tenure p. 45.	Strategy	This will be a future action.
Actions outlined are very SBC-led/focused.	Delivery Plan	We will include other stakeholders as delivery plans develop.
Action plans would be useful for Housing Associations.	Strategy	This will be looked at as joint actions/supporting actions. An

		overarching Action Schedule has been included in the delivery plan.
Missing communities in Delivery Areas - Lauder, Earlston, Stow, Newtown/St Boswell.	Strategy	Larger areas of opportunities were flagged first. This reflects the logical data/numbers driven approach. The LHEES will continue to develop & evolve, this does not mean these communities are not involved.
Clarify stance on log burners.	Strategy	Reference has been included to Scot Govt policy. There are concerns around pollutants and air quality and appropriate fuels/logs being used.
Inclusion of terms in glossary, e.g., confusion as to what EES:ABS; low regret; just transition means.	Strategy	These terms have been explained and defined in the glossary.
Greater clarification is required on the impact of heat pumps on the grid.	Strategy	We have referenced this and this is a key consideration in the broader electrification of heat.
More clarification is required on how fabric improvements could disrupt habitants' lives & mitigation tactics proposed.	Strategy	We have included detail on this, including fabric first being a key element of a wider approach. Buildings to be energy efficient need also to be wind and water tight in the first instance which is a particular issue with older buildings. Also across commercial sector where cost to upgrade external can be a barrier. This needs to be explained to inhabitants. Whilst some measures may be disruptive, the longer term benefit is worth it and ultimately should prevent further disruption.
What will the contingency plan be for rural communities who are imposed reliance on electrification?	Strategy	LHEES will consider appropriate measures for communities who are off gas grid. This is one of the main considerations within LHEES and these types of communities will offer early potential to move from oil/lpg/ to electrified heating. This is central to what the LHEES is looking to target and achieve – we have sought to make this clear.
More engagement with main housing providers, local green energy companies, private landlords is needed.	Strategy	We have included reference to the fact that engagement is key and we have a long term commitment to this. This needs to involve mutually beneficial arrangements to explore best options and opportunities. As projects go through feasibility studies, the engagement strategies and delivery partners will be identified and involved.

Inclusion of isolated hamlets or individual dwellings in the borders is needed.	Strategy	The isolated, off gas community are a key part of LHEES. Whilst their remoteness can be a challenge for some technologies/approaches e.g. Heat Networks, they may also present an opportunity such as localised communal heating. As every building is within scope for LHEES, no building will be omitted. But, an LHEES cannot address every single building immediately, so will be an opportunity vs need approach. This has been reflected in the final documents.
The LHEES needs to address the implications of high cost of electricity vs. gas.	Strategy	This is a key factor which the LHEES seeks to acknowledge. This is largely out of control for national energy prices (gas & electric), and while there could be local generation opportunities in future, the typical household/business is going to be subject to price increase/change. There are things we can mitigate against through energy efficiency and reducing energy use/requirement.
Further details are required on criteria for potential delivery partners to deliver large heat networks across clusters + for communal heating systems.	Strategy	This is already covered as part of the HNZ development work. RSLs are core stakeholders and will be consulted.
There are opportunities to be explored in Jedburgh & Galashiels close to Police Scotland facilities which could be anchor loads.	Strategy	This is being actively considered in the HNZ work.
Explore opportunity to use Charlesfield at St Boswells as an anchor to create micro-grids.	Strategy	The LHEES and SBC will look at and consider all emerging opportunities and options. We are aware that the landscape can change and develop quickly. Having a broad scope and developing awareness and relationships locally and nationally, should allow for these changes to be factored in and adopted as appropriate. Microgrids and local generation and distribution will be part of approach as and when appropriate opportunities present.
Greater clarity is required on progression to date and ongoing work.	Strategy	LHEES is a flexible document/plan. This means it will develop and have additional actions, projects, and focus as it matures. We will track, monitor and evaluate activity from a region wide perspective. The final documents seek to clearly identify ongoing activity and achievements to date.
The LHEES should set out similar pathways/plans for rural areas - e.g., off gas and more consideration for fuel poverty.	Strategy	These areas will be considered through the LHEES in due course.

5. CONSULTATION QUESTIONS

A copy of the consultation questions used in the survey is provided below.

LHEES 2024-2028: Consultation Questions

Introduction

The Scottish Borders Local Heat and Energy Efficiency Strategy (LHEES) sets out the vision for improving energy efficiency and decarbonising heat in our buildings in the Scottish Borders. The LHEES will consolidate existing energy reduction and affordable warmth strategies, schemes and future plans within a cohesive and overarching strategy.

An LHEES Strategy identifies what needs to be done to change buildings and relevant local infrastructure by 2045 to fulfil the Scottish Government’s objectives and local priorities relating to heat and energy efficiency in buildings. The Strategy will reflect national and local priorities, policies and wider strategies. It will take into account and interact with local and national factors, such as the timing of planned infrastructure upgrades, access to resources and funding, major projects, decisions over the gas grid and community engagement.

LHEES will be the core strategy and delivery programme for all local authorities to:

Reduce energy demand & Decarbonise heat supply

We’re asking people to share their views on our proposed vision, priorities, issues and key actions. We are interested to find out the views of householders and businesses within the Scottish Borders, as well as any group or organisation with an interest in energy and decarbonisation. We are seeking your feedback on the issues and actions to be included as we develop the strategy and delivery plan.

1. Are you responding as: Individual or an organisation
2. If responding on behalf of an organisation, please state your organisation:

LHEES Vision & Priorities

The Vision:

“Increase the energy efficiency of our homes and buildings, offer affordable warmth via zero emission heat, and deliver this as a just transition which tackles fuel poverty and builds community wealth.”

LHEES Priorities:

Cost of Heating:

- **Tackle poor energy efficiency as a driver of fuel poverty** by focusing on areas with high fuel poverty, leveraging EES:ABS and social landlord commitments and regulations.
- Drive energy efficiency to **make warmth affordable for all**.

Heat Decarbonisation:

- Support the **electrification of heat and renewable installation across buildings** in the region.
- Support the development of zero emission **heat networks, communal heating & renewables**.
- Target “low-regrets” **heating opportunities in off-gas areas**.

Just Transition:

- Support the local economy and **improve the regional skills, employment and supply chain**.
- Utilise procurement, delivery models, planning, regulation, and other powers to **make this transition work for the people**.

3. Does the LHEES Vision present a clear aim for the heat and energy decarbonisation transition in our region?

Yes

No

Don't know/ No opinion

4. To what extent do you agree or disagree with the LHEES Vision?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know/No opinion

Please share any comments on the Vision:

5. Are the priorities (Cost of Heating, Heat Decarbonisation, Just Transition) identified within the LHEES vision the right ones for our region?

- Yes
- No
- Unsure

Please let us know if any other priorities should be considered:

6. How important or otherwise, would you say each of the LHEES priorities are to you?

Cost of Heating

- Important
- Not important
- Not sure/don't know

Heat Decarbonisation

- Important
- Not important
- Not sure/don't know

Just Transition

- Important
- Not important
- Not sure/don't know

Policy & Targets

The Scottish Borders LHEES is primarily driven by Scotland's statutory targets for greenhouse gas emissions reduction and fuel poverty:

- Net zero emissions by 2045 and 75% reduction by 2030.
- In 2040, as far as reasonably possible, no household in Scotland is in fuel poverty.

7. Do you agree with SBC setting our targets in alignment with and in relation to the Scottish targets? If not, how could they be changed and what to?

- Yes
- No
- Unsure

Please explain further:

LHEES Potential Delivery Areas and Key Actions

The Local Heat and Energy Efficiency Delivery Plan (or Delivery Plan) details how the Scottish Borders Council will itself deliver as well as support other property owners and occupiers to deliver the vision of the Local Heat and Energy Efficiency Strategy (LHEES).

This Delivery Plan provides the prospective actions for the council, local communities, government, investors, developers and wider stakeholders, pinpointing areas for targeted intervention. In total there are 14 actions:

1. The council will update the LHEES and develop a new Delivery Plan before the end of 2028, as per legal requirements.
2. An annual update to the documents will be carried out if the need for an update reaches the appropriate level of materiality for each given year.
3. The council will use the LHEES as the starting point for further data collection and analysis (e.g. on building stock and heat demand) to deepen its understanding of opportunities as well as to keep the work started for LHEES and Delivery Plan updated

4. The council will seek further funding, including from the Scottish Government, to enable delivery at scale. The council will use this funding to build capacity and develop an LHEES Programme to deliver on the LHEES Vision.
5. The council will integrate its existing programmes into the LHEES Programme to develop a single vehicle to support the delivery of energy efficiency, heat decarbonisation and heat network projects.
6. The council will begin delivery of the LHEES Programme to the extent allowed and within the limited resources it currently has. The council will engage with the Scottish Government and other partners to discuss resource constrains as well as opportunities to grow the LHEES Programme.
7. The council will develop and implement programme management tools to deliver the appropriate projects where it has direct involvement.
8. The council will allocate responsibility of delivering the LHEES and this Delivery Plan to appropriate members of staff.
9. The council will establish a dedicated net zero programme to decarbonise its estate in line with national targets.
10. The council will use the decarbonisation of its estate to maximise any value that can be contributed to the success of the LHEES.
11. The council will develop a supply chain programme to address the dual challenges of (1) lack of skilled workers to deliver projects and (2) regional green economic growth and skilled employment. This will begin with a supply chain programme plan, which will be used to implement the programme.
12. Recognising that the success of the LHEES Vision is impingent upon investment, the council will work to ensure that it is maximising the funding available for projects across the Scottish Borders.
13. If the council is successful in its funding application to the HNSU, it will utilise that resource to develop a Heat Network Delivery Plan covering the three main strategic areas of delivery models, investment opportunities, and building a management case.
14. The council will undertake consistent and ongoing stakeholder engagement across the Delivery Areas, Heat Network Zones and Communal Heating Scheme opportunities. The council will also drive communication to inspire, support, advise and signpost people toward action, focusing these locations and growing this activity across the region as far as practical.

8. Are the potential delivery areas proposed in the delivery plan the right ones?

Yes

No

Don't know/ No opinion

If you have some suggestions for the potential delivery areas, or comments, please specify:

9. Are the actions proposed in the delivery plan the right ones?

Yes

No

Don't know/ No opinion

If you have some suggestions for actions, or comments, please specify:

10. Are there any major barriers that will stop us delivering the LHEES? Please specify

11. What action or actions do you think you or your group / organisation can take to contribute towards meeting Scottish Borders Local Heat and Energy Efficiency Strategy vision and priorities?

12. Do you think it is important Scottish Borders Council and the LHEES should support local skills supply and demand and local supply chain?

Yes

No

Unsure

Please provide details

13. Is there enough scope or opportunity to support communities to become involved in decarbonisation and energy efficiency activities or local initiatives?

Yes

No

Unsure

Please provide details/further explanation or suggestions

Any Other Comments

14. Do you have any additional comments about the Draft Local Heat and Energy Efficiency Strategy and Delivery plan that you would like to share?