

**ECONOMY, ENERGY AND FAIR WORK COMMITTEE****HEAT NETWORKS (SCOTLAND) BILL****SUBMISSION FROM****Glasgow City Council****Heat Networks (Scotland) Bill**

**Q1.** Which part of the Heat Networks Bill is of most relevance to you or your organisation, why, and what do you consider its impact will be?

*All parts of the bill are of relevance to our organisation, but part 3 is probably the most significant as it meets with the ambitions of our developing Local Heat and Energy Efficiency Strategy and should add more weight to any area specified as a heat network zone within the LHEES. Part 4 is also of significance as it will feed into our considerations for adopting a concession type model for developing heat networks.*

**Q2.** Are you content with the definition of heat networks used in section 1 of the Bill? (If not, please elaborate.)

Yes.

**Q3.** Previous consultations have identified different priorities for this legislation – including transition to low-carbon or renewable energy, tackling fuel poverty, and ensuring consumer protection. To what extent do you think such priorities are reflected – and balanced – in the Heat Networks (Scotland) Bill?

*The bill sets out the process by which heat networks can be licensed and developed in a manner supporting the needs of a licensing authority. Any reference to the above priorities is passing, with the bill putting all emphasis on the licensing authority to ensure that these priorities are met. Supporting materials to establish these priorities in 'standard conditions', as well as to support the granting of licenses, permits, etc, is essential to ensure a common approach across the country.*

**Q4.** What are your views on the licensing regime as envisaged by the Bill?

*The licensing regime proposed by the bill provides a robust framework for the assignation and control of licenses, however, until such time as the standard conditions are created, it is difficult to envisage how successful these will be in promoting the creation of DH networks.*

**Q5.** What is your opinion of the approach taken with Heat Network Zones (see parts 3 and 4 of the Bill)?

*There is a lack of definition with regards to what is 'an area' within a local authority area, making reviews of, and crucially, a reasoned decision on progressing or not to the designation of a zone. The LHEES process does, as undertaken by Glasgow City Council at least, establish a reasoned approach for designating zones. Care must be taken not to overload local authorities in the process of reviewing and assigning zones. Zones established or identified in a local authorities' LHEES should be considered sufficient to meet with the requirement in subsection 2a in section 38, and should be forced to be repeated based on the time at which the bill comes into force, unless the LHEES review took place a sufficiently long time before the bill comes into force.*

*The bill does not go into detail about what impact the designation of an area as a zone would have on the installation of alternative heat provision that is not linked to a heat network.*

**Q6.** How will the Bill impact on local authorities? (In terms both of the assessment of the suitability of their own buildings and also the power to designate heat network zones)

*The impact upon local authorities will be proportionate to the amount of zones established. Additional resource and skillsets will likely be required to allow for sufficient evaluation of submissions for licenses and permits, which, if not established as in-house services, will become an additional cost.*

**Q7.** Part 6 of the Bill confers powers for the compulsory acquisition of land and wayleave rights; to survey land for the purpose of construction or operating a heat network, and to access land in order to carry out repairs. What do you think of the extent of the powers in the Bill for licensed heat network operators (similar, in some respects, to those of utility companies)? Has a balance been struck with the rights of others (property rights for example)? If not, what would that balance be?

*I think there is balance in this part of the bill, especially with the provision of compensation and removal of assets should they no longer be used. As the infrastructure that will be subject of wayleave will be largely hidden, the installation should provide a temporary inconvenience that will be worth bearing for the benefits it will provide. This also brings heat networks in line with other utilities.*

**Q8.** Please feel free to provide your views on any other aspects of the Bill or the policy aims underpinning it if not covered above.