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Heat Planning and Delivery Team
Scottish Government
5 Atlantic Quay
Glasgow
G2 8LU

E: 2024heatstandard@gov.scot



**Scottish
Water**

Trusted to serve Scotland

Castle House
6 Castle Drive
Carnegie Campus
Dunfermline
KY11 8GG

Customer Helpline
T: 0800 0 778 778
W: www.scottishwater.co.uk
E: Regulation@scottishwater.co.uk

Dear Sir/Madam,

New Build Heat Standard Scoping Consultation

As this is a draft strategy Scottish Water believes that it presents an ideal opportunity to highlight those areas that we consider important in the new build arena. These are not currently covered in the Scoping Document and Scottish Water's view is that this would be an opportunity missed in terms of introducing Water Efficiency and Wastewater Recycling into the Standard, going forward.

1. Water Efficiency

Introducing greater water efficiency measures would support outcomes 2 and 3 of the Standard by improving the efficiency of hot water use, and therefore reducing household energy demand and energy bills. This would also contribute to Scotland's wider goal of improving resource efficiency, by supporting a sustained reduction in water consumption, which in our view requires a combination of behaviour and infrastructure change supported by building and planning decisions. Measures that would support this include:

- More stringent water efficiency standards for domestic and non-domestic building regulations
- A mandatory water label for all water using products linked to building and manufacturing standards would help ensure that products installed in new builds meet a minimum efficiency standard. Applying minimum standard regulations would remove sub-standard products from the market ensuring water efficiency is sustained even when fittings are replaced. A report by the Energy Saving Trust details the potential for significant water, carbon, and cost reductions available by implementing a mandatory water label linked to varying minimum standards in Scotland. In all scenarios modelled any additional costs to the house buyer from increased water efficiency standards are repaid within one year through reduced energy bills (**see link to Appendix 1**).
- Ensuring water is given the same weighting as energy when labelling housing as "Green". This will allow water efficiency to be considered in the same manner as energy efficiency standards.
- Considering the benefits of and barriers to water reuse technologies to maximise efficient use of Scotland's water resources, enabling greater implementation of these technologies in new developments.

2. Low Carbon Heat and Net Zero Emissions by 2045

Scottish Water believes that the new Heat Standard is a crucial element in the process of reaching Net Zero Emissions by 2045. By way of example, we are developing partnerships to maximise the unique opportunity that we have for recovering heat from our sewers.

One of our most recent projects is the Stirling District Heat Network which uses heat from waste water technology alongside a combined heat and power engine to generate low emissions energy – the first time these two technologies have been used together in this way in the UK.

We hope you will consider widening the scope of the New Build Heat Standard to include the innovations in water efficiency and low carbon heat. If you wish to discuss any of the above information, then please do so using the email address above.

Yours faithfully

Simon Parsons
Director
Strategic Customer Service Planning

Appendix 1 - Energy Saving Trust, Water Labelling Options: Cost Benefits Analysis for Scotland, 2020: <https://www.waterwise.org.uk/knowledge-base/est-water-labelling-options-cost-benefit-analysis-2020/>

End of Document -