

Stretton Climate Care

Future support for low carbon heat: Consultation Response

These are responses to the questions contained in the Government Consultation document. We have not responded to Q1-21.

<https://strettonclimatecare.org.uk/content/uploads/2020/07/Support-for-low-carbon-heat-consultation.pdf>

22. Do you agree with targeting support at domestic and non-domestic installations with a capacity up to and including 45kW? Yes/No. Please provide evidence to support your response.

A. No. There is a need for large scale installations where the capital investment required to extract heat and serve hundreds, maybe thousands of buildings from one scheme will need support. We will only meet our obligations under the Paris Convention and our statutory target of net zero emissions if there is a substantial increase in these installations. This proposal is contrary to the principle of the advice of the CCC in their latest progress report to Parliament

23. Do you agree that support for buildings technologies should change from a tariff to a grant? Yes/No. Please provide evidence to support your response

A. Yes. The current system inhibits installations by applicants who cannot raise the capital finance needed

24. Do you agree with our proposal to offer a technology-neutral grant level? Yes/No. Please provide evidence to support your response.

A. No

The grant should reflect the scale and cost of the proposal.

25. Do you agree that £4,000 is an appropriate grant amount to meet the aims of the scheme? Yes/No. Please provide evidence to support your response.

A. No. There is currently a very low take up of Renewable Heat and this change to the grant system is not attractive enough to increase this take up to the level needed to reduce the UK's carbon emissions in accordance with our new target of net zero emissions and ensure that we meet our obligations under the Paris Convention to limit temperature rise to 1.5°C. The investment required after grant will still be substantial and the majority of householders will carry on patching up their existing boiler.

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26. Do you agree with the recommendation for a flat-rate grant? Yes/No. Please provide evidence to support your response.

No. The number of renewable heat installations must be increased substantially. This can only be achieved by supporting large and small scale installations and multiple installations. The minimalist approach in the consultation will not achieve the number of installations that is required.

27. If you believe a variation by capacity should be considered, please provide evidence to justify a process and level for varying the grant.

No comment

28. Please provide any relevant views to help inform development of the delivery mechanism.

No Comment

29. Do you agree with the minimum efficiency requirements for heat pumps and evidence requirements? Yes/No. Please provide further evidence to support your response.

No comment

30. Do you agree with the proposal to require electricity metering for all heat pump installations? Yes/No. Please provide further evidence to support your response.

A. Yes It is important for householders to understand the energy use of the system

31. Do you agree with the proposed air quality requirements set out above? Yes/No. Please provide further evidence to support your response.

B. No. Many of the market towns in Shropshire have a population less than 10,000 and their air quality is also important. Church Stretton sits within a valley and is often impacted by temperature inversions that cause poor air quality despite its comparatively low population.

32. Do you have any comments on how best to ensure ongoing compliance with fuel sustainability and quality requirements following the redemption of a grant?

No comments

33. Please provide views on the appropriate requirements for the heat loss calculation, as well as the minimum heat loss value that should need to be demonstrated.

No comment

34. Please provide views on any other criteria to ensure that biomass support is focused on hard to treat properties only.

No comment

35. What do you consider to be the main consumer protection risks of providing support through an upfront grant and how might they be mitigated? Please provide evidence to support your response to question.

A. Identity fraud

36. Do you agree with the proposed budgetary control mechanisms as a means of preventing scheme overspend? Yes/No. Please provide evidence to support your response.

A. No comment

37. Do you agree that quarterly grant windows would prevent overspend and manage demand to ensure an even spread of deployment? Yes/No. Please provide evidence to support your response.

A. No comment

38. Do you agree with not supporting process heating under the Clean Heat Grant? Yes/No. Please provide evidence to support your response

No comment

39. Do you agree with not supporting biogas combustion under the new policies? Yes/No. Please provide evidence to support your response, including any wider detail on decarbonisation opportunities for biogas combustion in rural areas.

A. No comment

40. Do you agree with not supporting solar thermal systems under the Clean Heat Grant? Yes/No. Please provide evidence to support your response.

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A. Yes. PV panels can easily be used to heat hot water and provide a more versatile use of solar gain.

41. Do you agree with not supporting hybrid systems under the Clean Heat Grant? Yes/No. Please provide evidence to support your response.

A. Yes

42. What improvements could be made to the proposed approach for tackling non-compliance for participants under the Green Gas Support Scheme?

A. No comment

43. What are the main risks of non-compliance, fraud or gaming associated with the Clean Heat Grant?

A. No comment

44. What would be the most important features of an audit regime to minimise the risk of non-compliance?

A. No comment