Agenda Item	8
Report No	HP/13/24

The Highland Council

Committee:	Housing & Property Committee
Date:	1 May 2024
Report Title:	Heating Policy for Non-Domestic Estate
Report By:	Executive Chief Officer Housing and Property

1. Purpose/Executive Summary

1.1 This report provides an update on the development and adoption of a Heat Policy for the Council's non-domestic estate and the ongoing work by the Built Estate Thematic Group in embedding the proposed policy into the Net Zero Action Plan.

2. Recommendations

- 2.1 Members are asked to:
 - i. **APPROVE** the adoption and application of the proposed Heating Policy for the nondomestic property estate.

3. Implications

- 3.1 **Resource** There are no ongoing resource implications, delivery of related workstreams will be met from existing resources. The application of a heating policy has the potential to generate significant financial savings through improved efficiency.
- 3.2 **Legal -** There are no identified legal implications arising from this report. As staff working environments may be impacted, consultation with Union representation has been undertaken.
- 3.3 **Community (Equality, Poverty, Rural and Island)** There are no direct implications arising from this report.
- 3.4 **Climate Change / Carbon Clever** The application of, and adherence to, a Heating Policy will reduce energy consumption associated with the provision of heating to non-domestic buildings, and accordingly improve overall Energy/Net Zero performance.
- 3.5 **Risk** There is no risk directly relating to this paper.

- 3.6 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** The application of a heating policy will ensure a consistent approach to providing a healthy work environment, compliant with H&S requirements.
- 3.7 **Gaelic** There are no Gaelic implications arising from this project.

4. Background

- 4.1 The Highland Council does not presently have a defined policy or guidance for the provision of heating within schools, offices, leisure facilities and other types of non-domestic buildings. Although many buildings already operate within normal parameters, there are known instances where temperature setpoints and operational hours have been found to be out with expected parameters, to the detriment of good energy performance, budget management and comfort.
- 4.2 It is estimated that overheating a space by one degree in temperature can result in up to an 8% increase in energy use and cost. With increasing costs of heating our buildings, application of this policy has the potential to generate significant financial savings and reductions in carbon emissions.
- 4.3 The application of a heating policy is known to also typically improve comfort conditions for building users through consistent and reliable delivery of heating to occupied spaces.

5. Development to Date

5.1 The Built Estate and Energy Thematic Group have co-ordinated the development of the policy. An initial draft policy was brought to the Climate Change Committee in October 2023 and was received positively.

The finalised version of proposed Heating Policy is provided at **Appendix 1**.

- 5.2 Property Management have developed, and already issued to applicable staff, guidance documentation to assist and support building operators in understanding and controlling their respective heating systems.
- 5.3 Appropriate consultations have been undertaken with stakeholders, including but not limited to:
 - Union representatives
 - Property Management
 - FM Staff
 - Service representatives
 - High Life Highland
 - Building occupiers
 - Service users

5.4 The Heating Policy is an active document which will be reviewed periodically to take account of its effectiveness and impact on workplace environments. Proposed changes or variations to the policy will be brought to Committee for approval.

6. Implementation Timeline

- 6.1 The policy will take effect immediately however for practical considerations it is proposed that its implementation will be undertaken in a phased gradual manner over the next 2 months.
- 6.2 Work has already commenced with building and compiling a centralised database of operational hours for all non-domestic buildings, for checking alignment of heating provision to those buildings.

Designation:	Executive Chief Officer Housing & Property
Date:	1 May 2024
Authors:	Ronnie Macdonald, Energy Manager
Appendices:	Draft Heat Policy

1 Introduction

1.1 This policy sets out Highland Council's management approach to the provision of heating to our non-domestic property estate. It aims to comply with Health and Safety requirements, provide appropriate standards of thermal comfort conditions for staff, whilst minimising both carbon emissions and utility-related expenditure.

2 Space Temperature Limits

2.1 For most internal working environments, e.g. office type spaces, the Workplace (Health, Safety and Welfare) Regulations 1992 lay down particular requirements for most aspects of the working environment. Regulation 7 deals specifically with the temperature in indoor workplaces and states that:

'During working hours, the temperature in all workplaces inside buildings shall be reasonable.'

The application of the regulation is dependent on the nature of the workplace, e.g. school, office or warehouse. For schools, minimum temperatures are set out in the School Premises (General Requirements and Standards) (Scotland) Regulations 1967.

2.2 Table 1 defines the proposed heating levels for various building types found throughout the Council's non-domestic estate. These temperatures are in accordance with legislation and are based on guidance from the Carbon Trust, the Chartered Institute of Building Service Engineers (CIBSE) and the Health and Safety Executive (HSE).

Building Type	Temperature (°C)
Office Space	16 - 21
School Classroom/Office/Dining	18 - 21
School Corridor/Gymnasium	16 - 18
Nursery School	20 - 23
Additional Support for Learning School	20 - 23
Toilets/Cloakrooms	18 - 20
Enclosed Industrial Depot/Workshop	16
Store	16
Library	20 - 22
Sports Centre – Changing Room	21 - 25
Sports Centre – Sports Hall	16 - 18
Sports Centre – Pool Area	28 - 30
Museum	20 - 22
Care Home	21 - 23
Historic Building	18 - 22
Community Centre	18 - 22

Table 1 –	Heating Level	s by Site Type
	I louding Lovo	

Heating Policy - Draft

- **2.1** Table 1 indicates the range of internal temperatures targeted during the heating season for specific categories of building. These will be applied unless subject to contractual or operational necessity. The lower temperatures defined are likely to be experienced only occasionally, particularly around opening and closing hours of buildings. Normal temperatures should be maintained around the average of the upper and lower figures.
- **2.2** The stated temperature levels should not be regarded as the maximum temperatures which will be maintained in buildings. There will be occasions, e.g. warm, sunny days, when internal temperatures may exceed these figures. However, they do represent a level that our buildings should be heated to in cooler weather, to provide a comfortable working environment.

3 Application of Changes

- **3.1** It is recognised that there may at times be a requirement for some buildings, or particular areas within buildings, where specific circumstances require heating systems to be programmed outwith defined setpoint and time ranges.
- **3.2** Responsible Person/s, Facilities Management and Caretaking staff are authorised to apply time-limited changes directly at site level to pro-actively manage internal comfort levels within their respective buildings. Reversion to agreed setpoints shall be applied as soon as practically possible. Examples of time-limited changes include parents' evenings, sporting events and one-off extracurricular activities.
- **3.3** Where applied through Building Management Systems (BMS) changes shall be made in line with guidance issued by Property Services. Reference shall be made to the issued documentation, "Non-domestic Heating Adjustment Guidance". If there are any queries with adjusting BMS settings, please contact automaticcontrols@highland.gov.uk in the first instance.
- **3.4** When longer-term and permanent changes are desired, prior engagement and approval is required, before setpoints or time schedules are altered. Any proposed variation requires definition of new settings, areas in scope and justification, and for this detail to be recorded for future reference. These requests should be submitted via a Change Control form.
- **3.5** An electronic Change Control Form has been created to assist this process and will be available on the intranet for Responsible Person/s, Facilities Management and Caretaking staff to submit change requests and also notification of changes applied.
- **3.6** Property Services are available to provide support where required to help identify issues that can be addressed by building occupants as well as those issues requiring specialist support.

4 Building Users

- **4.1** Whilst every endeavour can be made to provide and operate heating systems in an efficient and effective manner, the actions of staff, pupils and users play an equally important role in maintaining a comfortable internal environment. With regard to heating systems, the following actions should be undertaken by all building users.
 - Turn down or switch off heating before opening windows
 - Ensure all windows are closed when a room is vacated (particularly overnight)
 - Ensure external doors are not left open to reduce un-necessary heat loss

- Report draughts and air leaks in a timely manner
- What constitutes a comfortable temperature is subjective to individuals. Building users should therefore dress appropriately for their own preference

5 Heating Times and Seasons

- **5.1** For educational buildings core heating hours are defined as Monday to Thursday 08:00 to 16:00, (Friday 08:00 to 15:00) and for offices Monday to Friday 08:00 to 17:00 hours. By default, heating systems shall operate to attain temperature values as stated in Table 1 during these core heating hours.
- **5.2** Outwith core hours, heating shall not normally be provided to the levels stated, for example, where the building is solely in use by cleaners, tradespeople and caretaking staff. HSE guidance states that if work involves rigorous physical effort, the temperature should be at least 13°C.
- **5.3** Other facilities with non-standard operating patterns, e.g. Depots and Community Centres, shall advise exceptions to core hours by submitting a Change Request form. Where required, the provision of heating shall reflect operational requirements.
- **5.4** The Heating Season shall be defined as 1st September to 31st May during which heating systems within occupied buildings will be operational and temperatures maintained as per agreed parameters.
- **5.5** During the start and end of the heating season (up to 4 weeks), heating shall be provided during morning periods only, with the expectation that sufficient heat shall remain in the building to provide an appropriate level of comfort until end of normal occupancy. These periods shall remain under review and be subject to external weather conditions.
- **5.6** During the off season (1st June to 30th August) heating systems should be switched off by default. During this period settings shall only be over-ridden by staff or contractors with prior agreement of the Head of Property Services and/or the Energy Manager. Request to be submitted via the Change Control Form.

Note - hot water arrangements and non-weather-related heating loads, e.g. swimming pools, are not subject to Heating Season constraints.

6 Portable Heaters

- **6.1** The use of portable electric heaters is discouraged in all buildings due to their lack of control and overall poor effectiveness. They are only permitted where their need is justified, and approval received from the Responsible Person.
- **6.2** Responsible Persons are able to approve the use of portable heaters, but only where there is evidence that the temperatures set out in Section 2.2 have not been achieved. Where approved, portable heaters require to
 - Have a valid Portable Appliance Test label, if required
 - Be of a suitable type for the location and working environment
 - Be plugged directly into wall sockets (use of extension leads with heaters is not permitted)
 - Be of a size which does not overload local electrical circuits

- **6.3** Queries with respect to compliance with the above requirements should be directed to Property Services. All use of localised space heating shall be notified to Property Services and/or the Energy Team.
- **6.4** In the event of a heating failure, relevant business continuity plans should be implemented and where possible alternative sources of heat will be provided.

7 Air Conditioning Units

- **7.1** Air conditioning units are not permitted for space cooling purposes unless their need is justified under exceptional circumstances, and approval received from both the Responsible Person and Property Services.
- **7.2** With the prevailing climate in the North of Scotland there is only sporadic and infrequent instances when internal space temperatures may exceed comfortable levels. It is viewed as inappropriate and un-necessary for portable cooling to be provided for these limited periods.
- **7.3** Where approved, only permitted air conditioning units supplied by Property Services are to be used within Council buildings. (Use of personally owned equipment is not permitted). Use of localised air conditioning shall be notified to Property Services and/or the Energy Team.

8 Swimming Pools and Pool Halls

- **8.1** Swimming pools and pool hall areas are significant users of energy for both ventilation and water heating. Additionally, humidity levels require to be controlled to minimise condensation and dampness. In order to reduce the amount of energy being consumed by swimming pools, pool covers **must** be used at the end of each day and at weekends or holiday periods where the pool is not in use.
- **8.2** In line with Carbon Trust recommendations, pool temperatures will be maintained at 28 29°C (proposed) with an air temperature in the pool area 1°C higher to limit evaporation from the pool surface.

9 Response to severe weather

- **9.1** In severe adverse weather conditions, heating systems may not be able to attain the temperature levels set out in Table 1. In this event Responsible Persons shall seek guidance from their Head of Service on actions required, in accordance with the Council's Emergency Response Procedures.
- **9.2** Severely cold weather presents a significant risk to buildings' operational abilities and frozen water pipes can lead to bursts, forcing sites to close with an associated detrimental operational impact and incurring additional cost for remedial works. Buildings' heating management systems should not be manually overridden unless specifically requested by Property Services.
- **9.3** In sites where frost protection exists, it must be set no higher than 10°C unless a specific building assessment identifies a different set level. Where a site does not have frost protection, this needs to be identified and it may be deemed necessary to turn the heating on to manual control to override the timeclock and ensure the heating is running. If the situation demands switching to manual this must be done in tandem with resetting the thermostats to maintain the minimum temperature required to prevent freezing.

10 Time and Temperature control settings - reporting and logging

- **10.1** Heating setpoints and operational times will be agreed and recorded for each property. An estate-wide database of settings will be created and maintained as a reference point in future reviews and assessments. Authorised deviations will be updated within the database to provide an auditable record.
- **10.2** When unauthorised deviations from agreed settings are identified, resetting may be undertaken automatically by Property Services, Energy Team and/or authorised contractors.

11 Roles & Responsibilities

11.1 In order to embed the Heating Policy across the Council it is important that Roles and Responsibilities are clearly defined. Table 2 sets out the responsibilities identified to date along with the suggested responsible parties for each action.

Title	Roles & Responsibilities
Property Services & Energy Team	 Overall responsibility for implementation and oversight of the Heating Policy
Property Services	 Approving changes to core hours or temperatures
	 Provision of support for FMAs & Caretaking staff
	Implementation of projects to improve energy efficiency
Energy Team	Approving changes to core hours or temperatures
	 Monitoring compliance with Heating Policy with associated reporting
	 Conducting energy audits as required with identification and development of projects to improve energy efficiency
Heads of Service (All Directorates)	 Ensuring that Heating Policy is being followed
Responsible	 Local monitoring to ensure guidance being followed
Persons	 Promotion of good practice actions
	 Verifying that pool covers are being used overnight and at weekends/holidays
	 Assisting in identifying energy efficiency opportunities
	 Approving use of portable heaters if required
FMA/Caretakers	 Recording heating set points and times
	 Promotion of good practice actions
	Ensuring pool covers are in place
A 11 - 4 - 66	Assisting in identifying energy efficiency opportunities
All staff	Comply with the Heating Policy and guidance
	Request changes only when necessary
	 Pro-actively support efforts to reduce energy consumption and associated carbon emissions
	 Closing doors and windows at the end of the day
	 Not adjusting locally set thermostats unnecessarily

11.2 Table 2 Proposed Roles and Responsibilities (subject to ongoing consultation)