

REPORT TO MARR AREA COMMITTEE – 16 APRIL 2024

DRAFT HEATING POLICY

1 Executive Summary/Recommendations

1.1 This report provides an update to the Area Committee on progress with the development and implementation of Aberdeenshire Council's new Heating Policy. It contains the latest version of the policy document, with comments incorporated from the recently completed consultation exercise, as well as an implementation programme.

1.2 The Committee is recommended to:

1.2.1 Consider and comment on the progress with development and implementation of the proposed Aberdeenshire Council Heating Policy; and

1.1.2 Provide comments on the draft Heating Policy document for Business Services Committee.

2 Decision Making Route

2.1 On 29 September 2022 the Aberdeenshire Council Route Map to 2030 and Beyond was approved by Full Council ([Item 14](#)). In order to meet a 75% reduction in emissions by 2030, this Route Map committed Officers to reporting against an annual Carbon Budget, with a Carbon Reduction Target for each Service. For the 2024/25 Carbon Budget, which was approved on 22 February 2024 ([Item 6](#)), Business Services were informed their Carbon Reduction Target would be 1,600 tCO₂e (tonnes of carbon dioxide equivalent).

2.2 In December 2023, when debating what to include for their Service in the 2024/25 Carbon Budget, Officers in Property and Facilities Management (P&FM) decided to explore the concept of a Council-wide Heating Policy.

2.3 The draft Policy was developed initially by the Engineering team in P&FM and issued for comments to the Sustainability and Climate Change team and P&FM Service Managers in late January 2024. Comments were incorporated, and the final Heating Policy document was issued for consultation to the Trade Union Joint Secretaries on 19 February 2024. The results of this consultation were received on 22 March 2024 and incorporated into the latest version of the proposed Heating Policy document which is attached as **Appendix 1**.

2.4 The development, governance, and implementation of this Heating Policy follows the 'Scheme of Governance Part 4B - Policy Development and Review Framework' document. This means the proposed Policy will need to go to the six Area Committees and then Business Services Committee for final approval. In February 2024, a programme was prepared to reflect this route – see **Appendix 2**.

2.5 The programme in **Appendix 2** states an intention to go to the Sustainability Committee in May 2024 but this meeting has now been cancelled. Bringing this Policy before Sustainability Committee was always an optional measure, but not required as part of the Policy Development and Review Framework process noted in paragraph 3.4 above. Therefore, no additional changes or delays are needed to the programme – the overall timeline will not be affected.

3 Discussion

3.1 In line with other Local Authorities, the creation and implementation of a formal Heating Policy by Aberdeenshire Council should unlock significant savings through the prevention of energy waste. Services will be supported on this focus with tools and advice, but ultimately empowered at a site level to take direct action and apply best practice.

3.2 Ensuring heating is being operated within the most appropriate schedules and setpoints to meet operational needs, and identifying and tackling persistent overheating, should mean the release of cost and carbon savings with minimal investment.

3.3 The Policy is intended to be ready for communication in June 2024 after passing appropriate approvals. The Policy will however need support from all leadership levels to deliver the forecast benefits.

3.4 The Energy team in P&FM have calculated the Heating Policy will provide estimated Carbon Savings of 923 tCO₂e (tonnes of carbon dioxide equivalent) in both 2024/25 and 2025/26, making it a key component of the Carbon Budget for Business Services in these years. This ties in with the estimated timescales for development and implementation of the Heating Policy. It is likely to take until June 2024 for full approval and launch. There will then be an 18-month period for the behaviour change it formalises to take effect, which would fall equally between the two financial years.

4 Council Priorities, Implications and Risk

4.1

Pillar	Priority
Our People	<ul style="list-style-type: none"> • Learning for Life • Health & Wellbeing
Our Environment	<ul style="list-style-type: none"> • Climate Change • Resilient Communities
Our Economy	<ul style="list-style-type: none"> • Economic Growth • Infrastructure and public assets

4.2 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial	X		
Staffing			X
Equalities and Fairer Duty Scotland			X
Children and Young People's Rights and Wellbeing			X
Climate Change and Sustainability	X		
Health and Wellbeing			X
Town Centre First			X

- 4.3 As reported in the Carbon Budget paper to Full Council ([22 February 2024](#)), the estimated Annual Cost Saving for this Heating Policy is £700,000.
- 4.4 There are no direct staffing implications arising from this Heating Policy,
- 4.5 The screening section as part of Stage One of the Integrated Impact Assessment (IIA) process has not identified the requirement for any further detailed assessments to be undertaken.
- 4.6 The following Risks in the [Corporate Risk Register](#) have been identified as relevant to this matter on a Corporate Level. However, it is acknowledged that working towards a 75% reduction in Council owned emissions has the potential to impact upon any number of areas across the Council risk portfolio.
- Risk ID ACORP010 as it relates to environmental challenges;
 - Risk ID ACORP006 as it relates to reputation management; and
 - Risk ID ACORP001 as it relates to budget pressure.

The following Risk in the [Directorate Risk Registers](#) has been identified as relevant to this matter on a Strategic Level:

- Risk ID ISSR010 as it relates to Climate Change.

The above risks could be mitigated against with sufficient communication and engagement on the progress Aberdeenshire Council is making with regards to this Heating Policy and how it relates to wider objectives on climate change mitigation and the Carbon Budget.

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report and are satisfied that the report complies with the [Scheme of Governance](#) and relevant legislation.
- 5.2 The Committee is able to consider this item in terms of Section B 11.1 of the List of Committee Powers in Part 2A of the Scheme of Governance as it relates to considering and commenting on proposals to amend Council policy and/or

develop Council policy in line with the Policy Development and Review Framework and make recommendations to the relevant Policy Committee.

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27 March 2024

List of Appendices –

Appendix 1 - Draft Heating Policy
Appendix 2 - Programme for implementation of Heating Policy

Appendix 1 – Draft Heating Policy

HEATING POLICY: GUIDANCE FOR THE APPROPRIATE USE OF HEATING AND VENTILATION IN ABERDEENSHIRE COUNCIL PROPERTIES

1 Introduction

- 1.1 Although guidance around energy use in Aberdeenshire Council properties has existed for a number of years, this Heating Policy document formalises this earlier work by providing a set of clear limits for the use of heating, to ensure overheating and energy waste is minimised, while at the same time maintaining appropriate comfort levels.
- 1.2 By 2045 Aberdeenshire Council aims to be Net Zero, and by 2030 is targeting a 75% reduction in emissions (from the baseline in 2010). A successful implementation of this Heating Policy is an important part of the Council's strategy towards meeting these targets.

2 Heating – Regulatory Framework

- 2.1 The Health and Safety Executive recommends a minimum indoor working temperature of 16°C if office based, or 13°C if work involves rigorous physical effort.
- 2.2 For most aspects of the working environment, the Workplace (Health, Safety and Welfare) Regulations 1992 lay down certain requirements. 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.
- 2.3 Minimum temperatures in Education buildings are outlined in School Premises (General Requirements and Standards) (Scotland) Regulations 1967. It states teaching spaces should have a minimum temperature of 17°C.
- 2.4 While excess temperature can be as uncomfortable as low temperature there is no legal upper limit, however, for schools there is some guidance on overheating in Building Bulletin 101 (BB101): Guidelines on ventilation, thermal comfort and indoor air quality in schools, 2018.

3 Temperature Levels

- 3.1 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).

Table 1: Heat levels by building type.

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

* When being used for physical activity. Space may be temporarily redefined as a classroom, e.g. during exams.

- 3.2 Heating shall not normally be provided to the temperature levels stated in Table 1 where the building is solely in use by cleaners, tradespeople, and caretaking staff working outside of core hours (HSE guidance states that if work involves rigorous physical effort, the temperature should be at least 13°C).
- 3.3 It is recognised that there may at times be a requirement for some buildings, or particular zones within buildings, where specific heating or cooling requirements means temperatures are set outwith agreed ranges. When such a requirement is identified, prior engagement and approval is required with the Head of Property Services and Engineering Services Manager, in advance of altering setpoints or time schedules. Any applied variation requires definition of new settings, areas in scope, and justification, and for this detail to be recorded for future reference.
- 3.4 Table 1 indicates the range of operational temperatures 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.
- 3.5 If the lower limit of these temperatures is not being achieved during non-heating season, the heating may be turned on until the lower limit is achieved.

- 3.6 If a building has exceeded the upper limit of any parameter listed above and heating is still on, steps should be taken to adjust setpoint and schedules. It is not appropriate to leave heating on and solely manage high temperature through increased ventilation, such as opening windows / doors.
- 3.7 Where individual air conditioning units are installed as an addition to a building's heating and ventilation system, the lower end set point, controlling the air conditioning, should be no less than 5°C above the heating parameters in Table 1 - to ensure that both heating and cooling systems do not run in conflict.

4 Implementation

- 4.1 A building with an operational heating system should be able to achieve the parameters outlined in Table 1. Ultimate responsibility for ensuring adherence to these limits is with the Head of Service controlling the financial code which pays for the heating for the site. This is delegated to the Responsible Premises Officer (RPO) for each property, with the individual nominated by the relevant Service.
- 4.2 Although the RPO is expected to ensure the heating operates within the limits in Table 1, it does not mean that person is responsible for "pushing the buttons", rather ensuring that buttons are pushed.
- 4.3 RPOs must develop a record of standard settings and schedules – i.e. a list of instructions to enable others to make changes in their absence (format to be agreed).
- 4.4 Where Building Management Systems (BMS) / Heating systems are operated remotely by the Energy Management Team, responsibility for identifying and reporting over- or under-heating primarily sits with the RPO at each site.
- 4.5 The Property & Facility Management (P&FM) team will provide support where required to help identify issues that can be addressed by building occupants, as well as those requiring specialist input.
- 4.6 Where operational considerations conflict with this policy, such as allowing children access to outside space in nurseries, sites should take steps to minimise energy wastage as much as possible.

5 Heating Times and Season

- 5.1 Core heating hours are typically Monday to Friday 08:00 to 16:00 for educational buildings and Monday to Friday 08:00 to 17:00 hours for offices. Heating systems shall operate to attain temperature values as stated in Table 1 during these core heating hours.
- 5.2 Additional schedules before occupation are not required in BMS controlled sites as they automatically compensate and should come on earlier if required. No schedule should continue once building occupancy ends. N.B. When

unoccupied, systems should be left in “Auto” to ensure frost protection remains active.

- 5.3 For other facilities with non-standard operating patterns, e.g. Depots, Halls, and Community Centres, or parts of schools with community access, the RPO for that premises shall advise the Head of Service for P&FM and Engineering Services Manager of exceptions to core hours by emailing a completed Change Request form (format to be agreed). Where required, heating times shall reflect operational requirements. To help minimise energy wastage wherever possible a new Change Request form is required for every time an exception is requested, although a single notification can cover multiple incidences for one building or cluster.
- 5.4 Heating Season currently runs from the second Monday in September to the second Monday in May. If there is a subsequent announcement of different dates for Heating Season, this policy will apply to the new dates.
- 5.5 If the internal temperature is too high at any time during Heating Season, the site’s heating may be turned off or reduced. This is particularly relevant up until the October break. And in the weeks at the end of Heating Season, the site’s heating may be turned off early, or reduced if internal temperatures are above the range in Table 1.
- 5.6 Out with Heating Season, where the minimum temperature is below those in Table 1, heating may be turned on, but the Energy Management Team must be informed.
- 5.7 While operation of Hot Water systems is not covered by this Heating Policy, they should follow the same principles of minimising waste contained herein. If water is needed outside or normal occupancy (e.g. for cleaning) tanks should only be heated when water is required, or for Legionella control.

6 Portable Heaters

- 6.1 Portable heaters confuse building heating control systems and usually result in colder overall temperatures as the main systems will be held-off. The use of portable heating is not permitted, unless maintenance teams have identified a system failure that prevents target temperatures being reached – see Item 6.2. Use of unauthorised localised space heating shall be reported to the Energy Team (method of reporting to be agreed).
- 6.2 Aberdeenshire Council’s maintenance partners have business continuity provisions to make appropriate full or temporary repairs. Where there is a partial or total system failure during Heating Season, this should be reported as a matter of urgency via the standard reporting channels. Where heating cannot be restored, portable heating shall be provided, based on advice from technical teams.
- 6.3 In cases where additional ventilation is required to maintain CO₂ limits, but this prevents target temperatures being reached, sites must actively manage the

balance between ventilation and temperature. Guidance and procedures are available here: <https://www.gov.scot/publications/coronavirus-covid-19-ventilation-guidance/>

7 Exclusions

- 7.1 While recommended swimming pool temperatures are identified in Table 1, these are site-specific buildings. As such, it is not appropriate to tie them to overly restrictive parameters beyond stating that attempts should be made to operate them as efficiently as possible, in line with current industry guidelines. 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.
- 7.2 Council properties being used as emergency refuge centres should operate systems as efficiently as circumstances allow.
- 7.3 Some Council buildings, such as libraries, may get utilised as “Warm Spaces”. In these the guidance to prevent overheating and waste should still be followed for whatever target temperature range is agreed. Heating schedules should be checked and updated regularly to ensure that they remain appropriate to Service needs. If no specific target has been agreed, the values in Table 1 – libraries are 20°C - 22°C – shall apply.
- 7.4 Maintenance activities (e.g. new flooring, post-leak drying) require abnormal setpoints and schedules. These should be applied for the shortest possible period before reverting to standard settings.
- 7.5 ICT shall manage heating and cooling in areas containing their equipment in line with their technical requirements. Where possible any heating or cooling they require shall not impact beyond their spaces.

8 Severe Weather

- 8.1 Severely cold weather presents a significant risk to buildings’ operational abilities and frozen water pipes can lead to bursts, forcing sites to be closed. Therefore, it is important to maintain an appropriate level of frost protection in all buildings.
- 8.2 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.

9 Logging and Reporting

- 9.1 Heating setpoints and times as detailed in Table 1 will be agreed and recorded for each property (refer Item 4.3). An estate-wide database of settings will be created and maintained as a reference point in future reviews and assessments. Any authorised deviations will be updated to ensure an auditable

record of heating times and settings exists demonstrating the appropriate level of authorisation.

9.2 When deviations from the levels in Table 1 are identified, and no authorisation is in place, resetting will be undertaken automatically by P&FM and/or Contractors.

10 Roles & Responsibilities

10.1 In order to embed the proposed 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.

10.2 Table 2: Roles and Responsibilities

Title	Roles & Responsibilities
Property & Facilities Management (P&FM)	<ul style="list-style-type: none"> • Overall responsibility for implementation and oversight of the Heating Policy • Approving changes to core hours or temperatures • Provision of support for RPO • Implementation of projects to improve energy efficiency
Energy Management Team	<ul style="list-style-type: none"> • Record 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)	<ul style="list-style-type: none"> • Ensuring that Heating Policy is being followed
Responsible Premises Officer (RPO)	<ul style="list-style-type: none"> • Local monitoring to ensure guidance being followed. • Verifying that pool covers are being used overnight and at weekends / holidays • Assisting in identifying energy efficiency opportunities • Ensuring record of heating set points and times is kept for that property
Facility Management / Janitorial Staff / Duty Officers	<ul style="list-style-type: none"> • Recording heating set points and times • Ensuring pool covers are in place • Assisting in identifying energy efficiency opportunities
All staff	<ul style="list-style-type: none"> • Following the Heating Policy and only requesting changes where absolutely necessary • Closing doors and windows at the end of the day • Not adjusting locally set thermostats unnecessarily • Reporting over- or under-heating to RPOs

Appendix 2 - Programme for implementation of Heating Policy

