RURAL LENS REVIEW

Heat and Buildings Strategy

RURAL SERVICES NETWORK

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At a glance

Rural Services Network's thoughts on the **Heat & Buildings Strategy**:

- Air source heat pumps are most likely to be attractive in homes that are well insulated[1] and are a cost-effective low carbon solution in **around 50% of rural households**[2]. However, the Government believes that 80% of off-grid homes are suitable for a heat pump, even though 47% of rural homes were built before 1949* and only 3% are at EPC C or higher.
- Hard to decarbonise rural homes with limited opportunity for further insulation will need diverse and decarbonised options, including wood pellets, low carbon liquid fuels, hybrid heat pumps, and BioLPG, with strict safeguards to ensure all biomass meets rigorous sustainability standards.
- The government's proposed **'Rural First'** approach, with a replacement boiler ban proposed from 2026 in off grid homes and small non-domestic buildings and 2024 for larger off grid businesses, will mean higher replacement heating costs for rural homes and businesses compared to urban on grid homes, where there is no confirmed boiler ban date (Sir John Armitt, Chair of the National Infrastructure Commission has called for a 2035 ban on new boiler sales).
- The government's proposed **Heat Pump First** approach is reliant on government's very optimistic aspiration for heat pump costs falling dramatically, from an average of £12,000 per rural home, to parity with gas boilers by the end of this decade. These cost savings will be difficult to achieve in hard-to-treat rural homes and by going first, rural homes won't enjoy the full benefit from any cost reduction in heat pumps.
- **Choice, not mandate** - options are needed that are suitable for **all** homeowners, dependent on their situation (financial, physical and property). To achieve conversion for all homes in 30 years needs financial support, available equipment, and a workforce to deliver – which needs a range of solutions. Solutions offered should be technology-neutral to encourage more rapid deployment of low carbon heating while ensuring fairness. Where heat pumps are installed, this should be because households want them, rather than because the law forces them to install one.

- **Equal status** – mistakes will unavoidably be made as heap pump installations ramp up, but rural areas should not be treated as a test bed to trial systems for the rest of the UK. 2 million diverse rural homes are not “low or no regret” or “low hanging fruit” – we need to get them right for the policy to work for everyone.
- **Heat Pump Ready first, not Rural First** – all homes post 1970 – both on and off grid – should be targeted first, not the more challenging off grid homes. Unlike rural homes this is where heat pump take up is most likely, where installations can be streamlined and thus cost savings are most likely to be achieved. This will help meet the government ambition of 600,000 annual heat pump installs by 2028 and reduce the risk of negative installation experience for households.

**based on the DECC Cambridge Housing Model.*

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BACKGROUND

1.1 The Government recently published its **Heat and Buildings Strategy**, click here to view.

1.2 As is the case with important policy announcements the RSN reviews the detail 'through a rural lens' – this is the RSN's Review of the Heat and Buildings Strategy through a Rural Lens. To view the full Rural Lens series covering a wide range of topics and Government announcements affecting rural areas, click here.

1.3 Alongside this Strategy the Government published Consultation Papers on (a) 'Phasing out the installation of fossil fuel heating in homes off the gas grid' and (b) Phasing out the installation of fossil fuel heating systems in businesses and public buildings off the gas grid. Both of those Consultations close on 12 January 2022. The RSN will consult its members on the Consultation questions before formulating its response. Details from those responses will be added to this Rural Lens Review in January 2022 when it is submitted.

1.4 The Heat and Buildings Strategy outlines how the Government plans to deliver related sections of its Ten Point Plan for a Green Industrial Revolution published in November 2020. The Heat and Buildings Strategy addresses the Ten Point Plan ambitions related to:

- Developing the Markets and Consumer Choices
- Commitment to Develop Hydrogen for Heating
- Greener Buildings

1.5 The RSN carried out a Rural Lens Review of the Ten Point Plan when it was published – click here to view. Most of the comments/concerns from a rural perspective remain in respect of the Heat and Buildings Strategy.

1.6 A report by Rural England CIC in June 2020 titled 'Opportunities and Challenges for Rural Consumers and Net Zero Legislation' is also relevant to the issues covered by this report. That report detailed that there are a number of the different challenges and opportunities for rural areas that are likely to be pertinent and need to be included in the design of strategy and implementation proposals. They include:

- That while most rural households have access to mains gas, a good half of households in smaller settlements (villages and hamlets) lie off the mains gas grid, so must rely on other heating sources e.g., solid fuel fires, oil, electricity, LPG;

- That one in ten rural households was classified as being 'fuel poor' in 2017. Moreover, fuel poor households in rural areas would need twice as much additional income to escape that classification as fuel poor households in urban areas;

- That more of the housing stock found in rural areas is older in age, which makes it less energy efficient and which adds complexity if installing energy efficiency measures;

- That many rural areas face additional development constraints. Some 9% of the land area in England is a National Park, 15% an Area of Outstanding Natural Beauty and 13% is designated as Green Belt. This has implications for developing energy infrastructure

1.7 The RSN is fully supportive of the aim to decarbonise the heating of buildings**. However, the different impact of the proposals in terms of the different timescales involved for on gas grid and off gas homes and buildings seem grossly unfair to rural communities.** All logic says that in terms of timescales a Strategy of "HEAT PUMP READY FIRST" rather than 'rural first' is the most appropriate and will achieve a bigger reduction in carbon emissions from buildings much earlier, and make achieving the government's ambition to install 600k heat pumps per year from 2028 more achievable.

1.8 In the rural context, an issue which is extremely important to the Heal and Buildings Strategy but also many other aspects of policies to achieve net zero is the fragility of the present electricity network. Increased electricity demand for heating and electric vehicle charging etc will put huge impacts on the electricity networks serving rural areas. The loss of electricity supply is a regular feature already in many rural areas and adverse weather conditions make that impact worse. We have already been told of a small rural affordable housing scheme with heat pumps being rendered financially inviable due to the costs of upgrading the local electricity network.

1.9 There is **no demonstrable RURAL PROOFING of these proposals.** In fact, the consultation impact assessment, paragraph 70, states that 98% of fossil fuel heated households are estimated to be in rural areas. As such the policy is expected to affect households in rural areas more than those in urban areas.

Government's Five Core Principles

1. **Take a whole-buildings and whole-system approach to minimise costs of decarbonisation** - We will consider the heating system in the context of what is most appropriate for the whole building**, as well as considering local and regional suitability and how best to manage system-level impacts.** This will also deliver UK jobs across a variety of specialisms.

2. **Innovation is essential to driving down costs, improving options, and informing future decisions.** We will ensure that regional, local and national decisions can be informed by the latest data and research and we will continue to work with industry to design processes and technologies to deliver value for money and value for the UK economy

3. **In parallel, we need to accelerate 'no- and low-regrets' action now** - Prioritising action to: improve buildings with low energy performance and high-carbon emissions, future proof new-builds to avoid the need for later retrofitting, adopt a fabric-first approach to improve building thermal efficiency, increase the performance of products and appliances, ensuring climate change resilience by mitigating risks of overheating and poor air quality, build the market by developing our technical expertise, growing the workforce, and expanding the UK's manufacturing capacity and capability. This includes building the market to install at least 600,000 hydronic heat pumps per year by 2028, which we know will be needed in all paths to Net Zero

4. **We will balance certainty and flexibility to provide both stability for investment and an enabling environment for different approaches to be taken to address different buildings** - We will provide long-term signals to investment by setting requirements and embedding flexibility in how they are achieved, so businesses and the public can prepare to decarbonise in a way that suits them and maximise the opportunities this presents, including investing in training in greener skills

5. **Government will target support to enable action for those in most need** - We will make sure that our policies support those who are hardest hit by COVID-19, such as small businesses and the fuel poor. We will also use taxpayer money efficiently to transform public sector buildings and improve the support and protection available for consumers

RSN COMMENT:
The core principles are to be welcomed. The key point is the extent to which detailed proposal are rural proofed to ensure they are fit for purpose in both urban and rural areas and that compliance costs are fair across all areas. Opportunities for skills, training and job creation must benefit rural areas too.

Government General Statement of Intent

The Government says: “Transition to high-efficiency low- carbon buildings can and must take account of individual, local and regional circumstances. Interventions need to be tailored to the people and markets they serve.”
RSN COMMENT: The detail in the specific proposals does not appear to match this general statement of intent. In rural areas the potential for Smart metering in driving different behaviours will completely fail unless all households have good and reliable broadband access. Whilst the Government says that people will not be forced to change their home heating systems the reality of the proposals is quite different. Under the proposal a household off the gas grid whose oil or LPG boiler breaks down and cannot be repaired will be required after 2026 to instal a new non fossil fuel heating system whilst those on the gas grid who face such a breakdown will be able to replace like-for like for 7 further years (to 2035). **That is simply unfair**. **I**n terms of timescales a Strategy of “HEAT PUMP READY FIRST” rather than ‘rural first’ is the most appropriate and will achieve a bigger reduction in carbon emissions from buildings much earlier, and make achieving the government’s ambition to install 600k heat pumps per year from 2028 more achievable.

To meet Net Zero virtually all heat in buildings will need to be decarbonised

The Government says “The benefits of more efficient, low-carbon buildings for consumers are clear: smarter, better performing buildings, reduced energy bills and healthier, more comfortable environments. Additionally, studies indicate that more energy efficient properties typically have a higher value than less efficient ones. Evidence from a study commissioned by BEIS indicated that properties with an EPC C rating were worth around 5% more than those currently at EPC D rating, after controlling for other factors such as property size and archetype. The 2020s will be key to delivering a step change in reducing emissions from buildings and establishing the foundations of a pathway to Net Zero. This means improving the efficiency and flexibility of our buildings, and developing the UK supply chains and technology options needed to save carbon throughout the decade and put us on a cost- effective pathway to Net Zero.”
RSN COMMENT: This is a very generalised statement which makes no mention of taking account of individual, local and regional circumstances. It is difficult to argue with the principle, but the devil is in the practical details of decarbonising rural properties at reasonable and affordable cost at the very least applying the same timescales as those which apply to on-gas grid homes.

The buildings transition presents huge opportunities for jobs, growth and levelling up

The Government says **"**Decarbonising buildings can provide a major economic stimulus, creating new highly-skilled jobs, products, markets, and supply chains in the UK, fit for a Net Zero future. As building improvements are labour-intensive, upgrading our homes and workplaces could rapidly create new opportunities and support over 240,000 low- carbon jobs by 2035 across the sector (from manufacture to installation and modelling to project management) as part of a green recovery, while also reducing energy bills and delivering better, greener, and healthier homes and workplaces. As the global market for low-carbon heat, smart products, and energy efficiency grows, UK businesses can make use of export opportunities in sectors where we have developed particular knowledge, experience and expertise. We are working to ensure that these opportunities are available across the UK,especially where they can help level up certain areas."

RSN COMMENT:

It is essential that the Government supports investment in the development of the new highly skilled jobs, products, markets and supply chains in rural areas with training and up-skilling opportunities which are accessible to rural residents. It would be tragic, and a missed opportunity - if rural areas could only be served by larger companies operating out of urban areas. **This is a real opportunity to support a thriving Foundation Rural Economy"**

Fairness and affordability are at the heart of our approach

The Government says "Investing in energy efficiency will bring down bills for millions of households and businesses – with Government support for low - income households to pay for improvements. Meanwhile we are acting to reduce the costs of low-carbon heat – with the ambition of working with industry to reduce the costs of heat pumps by at least 25-50% by 2025 and towards parity with boilers by 2030 and supporting consumers who switch early with £5,000 Boiler Upgrade Scheme grants. Alongside action to remove distortions in energy prices, heat pumps should be no more expensive to buy and run than existing boilers and we are investing in innovation to make them smaller, easier to install and beautiful in design."

RSN COMMENT:

1. There is no detail provided about the Government support for low-income households to pay for improvements, or indeed as to the definition of low-income households. Low paid, seasonal and part-time employment are features of rural economies. Many working families are low income.
2. There is little recognition that for many rural properties there are huge costs involved over and above the costs of the Boiler Upgrade Grant (£5k), with a heat pump installation in a typical rural home costing on average £12k. Homeowners and landlords will be expected to make 'cost effective' energy efficiency upgrades in addition to the heat pump installation cost, The rural housing stock has many much older properties which are difficult and expensive to insulate with massive upheaval involved in the carrying out of the works. It must be remembered that the population of rural areas is much older than the national average and that local wages are much lower. It cannot be fair that there is no government support for the additional costs that rural residents will have to meet
3. One in ten rural households was classified as being 'fuel poor' in 2017. Moreover, fuel poor households in rural areas would need twice as much additional income to escape that classification as fuel poor households in urban area.
4. The Government believe that the cost reduction in heat pumps is expected to be 25-50% by 2025 and achieve parity with boiler costs by 2030. However, a recent and independent study from Delta EE shows that even a 40% reduction by 2030 is ambitious.

5. **A CASE STUDY FROM A READER OF THE RSN WEEKLY NEWS BULLETIN**

In relation to your feature: https://rsnonline.org.uk/heat-pump-grants-worth-5000-to-replace-gas-boilers-not-enough I am getting increasingly frustrated by the lack of understanding about heat pumps, or certainly about ground-source ones (I have limited knowledge of air-source). You are 100% right that £5000 will not be enough. It may buy the actual pump, if a very basic one, but there are many other issues to consider, as we discovered when, wishing to do something eco-responsible, we explored the option for our own home. They were as follows:

- Ground source area from which to draw heat. We have 3 acres so this would have been no problem for us, but for many homes the ground-source option would be ruled out immediately (unless using the more expensive option of going vertically down).
- The type of heat generated. We have an old house, with oil-fired water-filled radiators, typically one per room. The low level heat generated by a ground-source or air-source pump would stop any individual radiator being stone cold, perhaps, but would never be remotely enough to heat a room.
- We would consequently need to install a different system of spreading low-level heat round the rooms instead. This could be either underfloor or wraparound, either of which would probably work, provided we were prepared to rip up floors to put a network beneath them, or remove plaster on surrounding walls to fit heating panels – and then in either case re-lay the floors, or re-plaster the walls.
- The cost. We were told that we would be looking at £25,000 or more to do this. Not to be completely put off, though, we calculated the assumed annual saving on fuel costs, to see if that would make it worthwhile in the longer run. We were even prepared to look at, say, a 10-15-year pay-off period. No chance. It became clear we would be dead long before we stood any chance of even covering our costs.

So, in the end, we replaced our somewhat inefficient oil-fired boiler with a new, more efficient condensing boiler (which was still not cheap). It solved our problem, and our oil use immediately declined considerably, which is admittedly only a small contribution to reducing our fossil fuel use, but better than nothing.

At the end of the day, nothing is as simple as the Government makes out!

6. The overriding issue about housing and buildings in rural areas is the state of the existing stock. Many buildings in rural areas date back over 100 years and do not lend themselves to retro fitting of insulation to meet modern targets of EPC C – only 3% of rural homes currently meet EPC C. The cost of retro fitting such insulation is expensive, disruptive and currently considered uneconomic using any standard payback calculation.

7. Research by Calor Ltd shows that for a typical pre 1918 4 bedroomed house (representing about 12% of English rural homes) the costs of installing a heat pump plus insolation and retrofit costs is circa £35,000 and that the works/disruption would take about one month to carry out.

8. The Boiler Upgrade Scheme grant of £5,000 is in practice just a new name for a scheme which has operated for some time – giving grants of £5000 in fact. It is unlikely to increase the pace of conversion any greater than the existing scheme.

Net Zero will mean gradually, but completely, moving away from burning fossil fuels for heating

The Government says this "is why we are setting the ambition of phasing out the installation of new natural gas boilers from 2035. The future is likely to see a mix of low-carbon technologies used for heating: electrification of heat for buildings using hydronic (air-to-water or ground-to-water) heat pumps, heat networks and potentially switching the natural gas in the grid to low-carbon hydrogen. While there is work to be done to identify the best solutions for different buildings and regions, there are also areas where the solution is clear and we can take decisive, 'no-regrets' action now. No or low- regrets' means actions that are cost-effective now and will continue to prove beneficial in future. For example, installing energy efficiency measures reduce consumer bills now, while making buildings warmer and comfier, but have the added benefit of making future installations of low-carbon heating more cost-effective. For example, hydronic heat pumps will be a key technology for new buildings and buildings not connected to the gas grid, and heat networks will be a key technology in areas of high-density heat demand and where there are large low- carbon heat sources. Consultations published alongside this strategy propose how regulations can encourage the transition in these segments."

RSN COMMENT:
Heat pumps may provide opportunities for up to 50% of rural households, however the hard to decarbonise older housing stock with limited opportunity for further insulation will need other options, including switching to bio-fuels such as bioLPG. Heat networks may play a role in rural towns and villages, potentially using biofuels in off gas grid areas, but will be limited for remote rural properties.

Rural areas are faced with a greater challenge than the country as a whole – a switch to low carbon is perceived as expensive in terms of investment as opposed to urban areas where economies of scale may be achieved – with deployed resources either being better utilised (heat networks) and demand is lower (greater proportion of modern well insulated buildings or lower distances travelled). For these reasons, the government's intention to decarbonise rural homes first could prove to be perverse given these challenges

The cost of retrofitting many rural houses, including relatively modern stock, is typically not economically viable, and despite best endeavours will still not meet the future standards required. In assessing 'cost effectiveness' the whole costs must be factored in. The Federation of Master Builders' national retrofit strategy believes 'hard to treat' homes should be the last to be retrofitted (from 2035), not the first. This is because of the additional challenge and complexity, requiring a better developed and more highly skilled approach than for other types of home.

Interestingly, the Rural England CIC report 'Opportunities and Challenges for Rural Consumers and Net Zero Legislation' says **"**In the search for the "silver bullet" technology other solutions which may assist in reducing carbon emissions are rejected as lacking "absolute purity" where in the medium term their adoption may contribute significantly to a reduction in emissions. In the short-term biomass fuels including BioLPG and others offer significant cuts in the emissions rate of today, while still contributing to those emissions. These technologies can be part of the solution given that in some cases building retrofit including insulation is uneconomic. However, adoption of these intermediate solutions while striving to achieve scaleability in production and price of the longer-term answers is a useful approach – accepting that in some cases the bio-fuel approach may be the answer."

We will take major strategic decisions on the role of Hydrogen for heat by 2026

The Government says “The infrastructural and regulatory implications that will come with mass adoption of different low-carbon heat sources – such as new electricity generation capacity and network reinforcement and additional hydrogen production plants – will be transformational. Strategic decisions will be required to enable a co-ordinated, efficient,effective and affordable mass decarbonisation by 2050. These decisions will need to be informed by a comprehensive programme of research, development, planning and innovation over the coming years. In particular, we will explore the potential to use hydrogen for heating buildings in the next few years to inform a strategic decision on the role of hydrogen in decarbonising heat in 2026. Along our journey to Net Zero, we will need to take co-ordinated decisions across all levels – national, regional, local and individual – to ensure we deploy the most suitable low-carbon heat source for that area or building.”

RSN COMMENT:
This cannot really be argued with. In framing infrastructural and regulatory proposals, it is essential that they are properly rural proofed. Due to relatively low energy density of H2 compared to existing fossil fuels, H2 is an impractical fuel for off grid as in practice larger storage vessels and more frequent deliveries would be required.

We need to act now to develop the market and bring down costs for energy efficient low-carbon heat

The Government says “Heat pumps and Heat Networks are proven scalable options for decarbonising heat and will play substantial roles in any Net Zero scenario, so we need to build the market for them now. A UK market with the capacity and capability to deploy at least 600,000 hydronic heat pump systems per year by 2028 can keep us on track to get to Net Zero and set us up for further growth if required. This means ramping up UK-based supply chain and deployment from approximately 35,000 heat pumps a year, to potentially being able to replace around 1.7 million fossil fuel boilers per year by the mid-2030s. We are also working on and investing £338 million over 2022/23 to 2024/25 into a broader Heat Network Transformation Programme to scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning, which will create a step change in low-carbon heat network market grow.”

RSN COMMENT:
The market for options other than heat pumps needs equal attention, and government needs to be clear about which homes are unsuitable of heat pumps taking into account building fabric, householder disruption and affordability.

The journey to Net Zero buildings starts with better energy performance

The Government says “Increased awareness of energy use and the need for greater efficiency is the first stepping-stone to enabling consumer decisions to improve building energy performance and use smarter, more efficient products and systems. Improving energy efficiency by adopting a fabric-first approach is key in ensuring the transition to low- carbon heating is cost-effective and resilient. ‘Fabric-first’ means focusing on installing measures that upgrade the building fabric (e.g., walls/lofts) itself before making changes to the heating system. We are committed to supporting businesses and households to upgrade as many buildings as possible to higher levels of energy efficiency and flexibility, in a way that will ensure long-term compatibility with low-carbon heating systems.”

RSN COMMENT:
Specific proposals are needed for off grid rural homes and ‘buy in’ from off grid homes that they are to go first, with realistic and affordable options available to households and landlords.

We need to take a co-ordinated system-wide approach to decarbonise cost-effectively

The Government says “To deliver Net Zero in a way that delivers value to consumers, we need to consider the measures needed to decarbonise heat alongside the decarbonisation action needed in other sectors. This includes the generation, distribution and storage of energy (such as electricity and hydrogen), and the associated investment and reinforcement of infrastructure required. We will need to consider this at a national and local level. To minimise generation demand and thereby reduce costs, we need to create a smart and flexible energy system, and ensure buildings use energy in a smart and flexible way.”

RSN COMMENT:
The electricity network serving rural areas is likely to require significant enhancement to deal with all Net Zero implications. The rural electricity network is very vulnerable to adverse weather conditions. A move to electric heating will place additional constraints on the network and it’s not clear how electricity network upgrades will keep pace with heat pump and EV deployment off grid. Hybrid heat pumps could play a role in helping manage electricity demand.

Non-Domestic Buildings

The Government says: “There are approximately 1.7 million non-domestic (commercial, industrial and public) properties in England and Wales, from small businesses to global conglomerates. Of these, 17% are situated in areas with no connections to the gas grid. Non-domestic buildings account for around one-third of UK emissions from the building stock. Buildings in the private commercial and industrial sector have a wider range of uses including shops, factories, and offices. This means they have greater variation in heat demand. Public sector buildings account for 9% of UK building emissions.

Public buildings, like commercial and industrial buildings, are very diverse and include hospitals, schools, and government buildings, each of which has different heating needs. The five largest non-domestic energy users are offices, retail, industry, health, and hospitality, which together account for approximately 71% of non-domestic building energy consumption in England and Wales. However, energy use also varies greatly within these sectors. It is therefore, important to build flexibility into how buildings with different uses can decarbonise, while maintaining overarching targets to set direction and keep us on track for Net Zero.”

The Government is consulting on the design of the policy, including on its proposals to:

- Use the natural replacement cycle to phase out oil, LPG or coal heating systems inbusinesses and public buildings off the gas grid.
- Take a heat pump first approach to the replacement of those fossil fuel systems.
- Allow the limited use of alternative low carbon systems, such as solid biomass, where aheat pump is not suitable.
- Introduce the policy using a phased approach with the largest buildings first (from 2024at the earliest), followed by smaller buildings (from 2026).
- Consider whether it may be appropriate to end the use of fossil fuel heating in all non-domestic buildings off the gas grid, potentially in the 2040s.

The Government is seeking views on a phased approach to implementation, introducing this policy for large buildings first (those with a floor area of 1,000m^2 or above), followed by smaller buildings a few years later. We believe it will be necessary to introduce this policy for the largest buildings in the mid-2020s, to ensure that those businesses are on the pathway to decarbonise by 2050. The actual date of implementation would be dependent on the legislativevehicle used to implement the policy and future heat pump market conditions; however, we expect it to be no earlier than 2024.

For the Private Rented Sector the proposal is to require privately rented, non-domestic buildings to improve their EPC score to Band B by 2030.

The Government says “We have established that electrification offers the most realistic pathway to achieve this,as supported by respondents to the call for evidence and the Climate Change Committee. We recognise that there may be a strategic role for other low carbon heating systems, including bioenergy, hybrid heat pumps, solar technologies, and heat networks; we expect a greater mix of technologies to be necessary for non-domestic buildings due to their varied uses of heat and hot water”.

The Government acknowledges that” installing a heat pump will add to the electricity demand of a building and, as we see significant growth in the electrification of heat, additional electricity generation and reinforcement of the electricity distribution network will be necessary for some buildings”

The consultation document states “In buildings currently fuelled by LPG, modification to the boiler system will not be required for the use of bioLPG since the fuels are chemically identical. Thereis therefore no additional upfront cost outlay associated with a transition from LPG to a bio- blend”.

RSN COMMENT:
A very ambitious timetable with boiler bans for some businesses from 2024 and requirement to fit higher cost low carbon heating systems, with no government support. As referred to in the Background Section of this document the RSN will consult its members on the Consultation questions before formulating its response. Details from that response will be added to this Rural Lens Review in January 2022 when it is submitted.