

Response to Energy Efficiency and Microgeneration Consultation from Aberdeen Campaign Against Climate Change

Question 1. *Do you agree with the overall approach taken in this draft strategy for improving energy efficiency and encouraging greater uptake of microgeneration ?*

We have some comments and suggestions as follows:

Building Regulations paragraph 5.16

Improvements to building regulations are very welcome. We welcome plans to undertake thermal imaging as a way of testing compliance. However, there needs to be more enforcement of the regulations regarding energy efficiency.

Studies done in England and Wales show that 43 % of new properties do not comply with existing energy standards in building regulations. (M Brown (2004) Building Research Establishment) This compliance is even lower for houses.

The Scottish Building Standards Agency has not undertaken any formal research into compliance with building regulations in Scotland. However there is much other evidence to show that compliance is a problem here too.

References: www.foe-scotland.org.uk/nation/BRF_Aberdeen_report.pdf

“Thermal performance of new housing in the Aberdeen area” by Building Research Establishment (B.R.E.) Scotland

There is also extensive evidence of this problem in the report “ Compliance with Part L1 of the 2002 Building Regulations (An investigation into the reasons for poor compliance) Final report 3/5/06 prepared for the Energy Efficiency Partnership for Homes. Report produced under contract for the Energy Saving Trust by Christine St John Cox, Future Energy Solutions, Didcot.

This report is UK wide, including problems identified in Scotland.

As a minimum approach to ensuring compliance, compulsory air tightness testing must be introduced, to bring Scotland up to the level that currently exists in England and Wales. Local building control officers require additional resources in order to help them to ensure maximum compliance with building regulations.

When building improvement works such as extensions are added, areas in the property opened up during building work for renovations etc, such as an otherwise inaccessible uninsulated loft space, should require to have insulation added at the same time. This would not be onerous or expensive to do. Unless this is a requirement, this would be a missed opportunity.

Insulation challenges– paragraph 6.12

This says “ Scotland has a high proportion of housing that is not suitable for cavity wall insulation including tenements, multi-tenured flats, solid walled and timber-framed dwellings, and housing in exposed areas that are subject to wind-driven rain. There are also further problems with shared areas and joint responsibility for roofs etc “

This paragraph is defeatist and not accurate. Aberdeen City Council has overcome the challenge of insulating the cavity walls of multi-tenured blocks with a project which employs a liaison person to be the link person between the householders and the installers. This project has been and continues to be very effective. Aberdeen City Council’s project should be used as a Best Practice example for other local authorities to follow. Funding would help too.

Aberdeen City Council is also addressing the general challenges of tenement properties with the Aberdeen Victorian Tenements Project. This project has funding initially from the Energy Saving Trust but in order to be fully effective, required ongoing funding. This project has achieved a large amount of energy saving measures, through involving the householders and encouraging them to work together. This should also be used as a Best Practice example for other local authorities to follow. Again, more funding for local authorities to undertake these initiatives would help considerably.

Scotland has a high number of challenging roof types with rooms in the roof, which cannot be insulated using funding from Warm Deal and EEC. Also there is not yet an easy way of insulating old timber frame walls. Research into these insulation methods is urgently required. However there is not nearly enough funding available for this kind of research and this is subject to competitive applications. Given the importance of this research, the funding should be easily available.

Transport paragraph 1.35

All the possible CO2 savings in buildings will count for very little if the problem of unsustainable transport is not addressed. There is an irony in that many middle income households who make savings in domestic fuel bills from energy efficiency, use their extra income from fuel savings on more flights abroad. The great majority of those who use budget airlines are not the poor, far from it. Working men earning more than £40,000 a year are responsible for the lion’s share of climate change emissions from personal travel. (Oxford University study 2007)

Question 2 Do you have any views on the key actions covered in the draft strategy summarised in Chapter 8 – Conclusions and Next Steps ?

Domestic sector

With reference to the domestic sector, many of those interested in energy saving etc have already had advice from their local energy advice project. Having local one stop shop advice centres

would serve a useful role. However given the fact that there has been a lot of information around already and in a lot of areas much or even most of the easy insulation jobs have been done, there now needs to be a far more pro-active approach where difficult areas or customer groups are targeted.

The local co-ordination of projects is therefore essential. The best way to provide this would be to have more funding for **full time** HECA officers employed directly by local Councils. The problem with a system where the Energy Saving Trust provides staff to undertake work with local authorities is that these staff are not directly accountable to local authorities and cannot drive forward projects. Their effectiveness is variable.

Question 3 *The draft Strategy states that we will consider targets to be included in the final Strategy and Action Plan:*

- a) *Do you have any views on specific targets referred to within the draft ?*
- b) *Are there any other targets which you believe should be considered ?*

Targets for cavity wall insulation in multi-tenure blocks would be very useful. These targets should be very high.

Question 4 *Are there any other comments you would like to offer on this strategy in relation to the promotion of energy efficiency and microgeneration in Scotland ?*

Renewable Heat

Heat pumps could achieve huge savings in CO₂ and fuel costs. However there are several existing barriers to take-up of these systems.

Because heat pumps are electric systems which often replace fossil fuels, the new electricity requirements from the grid can be much higher than before. It is the customer who has to pay for any upgrade required to the grid for their increased electricity demand. The system for deciding charges is not transparent and seems inconsistent. These charges can be very high and there are no grants available. This issue needs to be fairly dealt with.

Biofuels for heating and transport

Biofuels can produce more CO₂ than is realised, especially the clearing of rainforests and the burning of the peatlands to grow palm plantations. This clearing and burning produces vast quantities of CO₂

In Germany most C.H.P. is now run on palm oil. Much of this comes from plantations which used to be rainforest but were cleared. This is not what people have in mind when they support decentralised energy, but it's vital that all legislation does not allow for a loophole that allows this to happen. Market forces favour the cheapest source of biomass and even for C.H.P. that will inevitably be biomass from the tropics.

Various proposals for certification have too many loopholes. Too much is left to trust. Reporting requirements are not the same as proper standards and of course companies will give the “correct answers”. U.N. proposals for carbon trading would save only 50 % of the rainforests. Theoretically the public can choose sustainability but in practice they won't be able to as there will be a mix of biofuel products at the fuel pumps.

There needs to be a moratorium on all large scale monoculture biofuels until the problems and loopholes regarding certification etc are sorted, otherwise there will be nothing left to sustain.

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