

Consultation Response

Energy Efficiency and Microgeneration. Achieving a low carbon future. A Strategy for Scotland

The Scottish Rural Property and Business Association welcomes the opportunity to comment on the consultation paper on Energy Efficiency and Microgeneration.

The SRPBA wishes to make the following comments:

General

The SRPBA welcomes this strategy which together with the proposed Renewable Heat Strategy should form part of a single Scottish Energy Strategy which would also cover larger scale generation. In order to have a coherent and effective approach to tackling climate change and achieving energy security a coherent strategy is required to which targets and incentives can be tailored.

Responses to Consultation Questions

1. The draft sets out changes to regulations such as building design to achieve energy efficiency. We agree this will be one effective way of achieving greater energy efficiency for new buildings but does not address the stock of existing buildings. Incentives as well as information and advice will be required to encourage greater energy efficiency in existing buildings. SRPBA members will be primarily concerned with residential and agricultural business properties. Many of these businesses are operating at the margins of economic viability and additional investment in energy efficiency measures may not be high priority without appropriate incentives being available.

Energy Performance Certificates will not in themselves create the desired outcome unless there is some value placed on a favourable certification.

The SRPBA is supportive of the proposals for encouraging microgeneration. Scottish Renewables, in their 2007 publication "Changing the Energy Climate" notes that importantly microgeneration is not limited to the purchase and design of individual building devices. More innovative solutions such as district heating systems can enable greater efficiencies leading to enhanced cuts in carbon emissions and more cost effective solutions for consumers and businesses. Such solutions could be delivered at estate scale in the rural context and some SRPBA members are already doing this. Changes such as appropriate permitted development rights could assist. Local taxation reliefs could also be used as an incentive.

2. The SRPBA is supportive of the key actions set out in the Conclusions and next steps, although would welcome further measures to provide incentives for the business sector.

3. The SRPBA does not have the technical expertise to suggest specific targets, but as a general comment believes that any targets should be achievable so that individuals and businesses are not unnecessarily daunted by the targets which could act as a disincentive to action. Targets should also be accompanied by incentives where they will have a financial impact on businesses.

4. Paragraph 6.13 refers to "investigating the barriers to take up" and to "currently investigating a range of options". It is difficult to make comments when the instruments to deliver the strategy are not apparent. An essential component of the strategy should include adequate incentives for the uptake of microgeneration and energy efficiency.



5. The SRPBA membership has a significant contribution to make to the implementation of this strategy. As land managers including a range of agricultural and forestry interests as well as estates which form small rural communities in themselves, our members can facilitate innovative solutions for the benefit of wider rural communities.

Date of Issue: 13/06/07