



CONSULTATION – SCOTTISH EXECUTIVE

**"ENERGY EFFICIENCY AND MICROGENERATION – ACHIEVING A LOW CARBON
FUTURE – A STRATEGY FOR SCOTLAND"**

RESPONSE FROM WEST LOTHIAN COUNCIL

1. General

- 1.1 As a signatory of the Scottish Climate Change Declaration West Lothian Council welcomes the lead that must be taken by the Scottish Government in addressing carbon dioxide emission reduction to meet Climate Change Programme targets. It endorses efforts to significantly improve energy efficiency and agrees that this is just part of the strategy that needs to be developed and implemented. Energy source is the principal issue.
- 1.2 In that context it is considered microgeneration has a role in the production of sustainable energy but the council is more cautious in considering its significance as a contributor when assessed against the barriers that exist to its wide introduction, including that of cost effectiveness. That apart, it is regarded by the council as part of the technological advancements that must be made to address the energy supply question. In this regard its efficiency and application must be developed. While its significance in contributing to tackling climate change is not regarded as being as strong as the strategy suggests, nevertheless it has a part to play and government needs to take a positive lead. In this context, it is disappointing that small and large scale community schemes are not properly represented as a likely way of delivering cost effective solutions. This is regarded as an important omission and needs to be addressed.

2. Setting the Scene (chapter 1)

- 2.1 While various CO₂ reduction targets have been set at international and European levels, the proposed statutory UK target of 60% by 2050 is the most ambitious and challenging. This, therefore, needs to be the driving force of the strategy and the foundation of the resulting action plan that will arise from it. The strategy does not reflect on the step-by-step achievements that will have to be made to reduce CO₂, nor on the successive phasing of targets that will be required on 5 year cycles to meet it. The action plan should address these.
- 2.2 Energy efficiency alone will not be sufficient to enable Scotland to meet its target, let alone any more ambitious ones that may be set. It is agreed that energy from sustainable sources, presently at 13% of electricity generated, will not be significantly assisted by microgeneration. In the context of the 40% target of electricity being supplied by renewable sources by 2020 the strategy fails to identify what proportion of this should come from microgeneration. While research is referred to that suggests by 2050 widespread installation could provide 30-40% of Scotland's electricity needs, this is seriously questioned as either being realistic or reliable in relation to the current effectiveness of the technology or its application and the technological advances required. To achieve this will require significant investment and commitment by the industry.

- 2.3 It is noted that transport is introduced as an energy issue but it is agreed that in the context of the strategy this is not the place to address what are separate and equally challenging carbon balancing matters. However, it is not clear why the Executive should treat a Renewable Heat Strategy as a separate issue when the technologies so overlap.

3. Energy Use in Scotland (chapter 2)

- 3.1 The analysis provides a valuable focus on domestic consumption of energy and its increasing importance as the principal demand on electricity supplies, for heating and lighting. The disadvantaged climatic influences, shorter days etc, due to Scotland's geographic location, is a constraint but the distribution of its population could, by contrast, provide opportunities for decentralised energy generation. Whether there are such opportunities is not analysed but, in the central belt in particular, this requires assessment to identify possible strategic direction and investment needs. An example would be anaerobic digestion in relation to area waste management and the energy generated by this process.

4. Changing Our Behaviour (chapter 3)

- 4.1 Raising awareness to create a cultural change in energy use (efficiency) and conservation relies on the combination of targets, regulation and the cost interpretation for users. Changing behaviour of industry is probably more to do with cost savings and overheads than their commitment to carbon dioxide emission reduction. Yet, the approach being taken by the Executive and others is beginning to make inroads and similar efforts need to be targeted at the domestic sector. In this context a one-stop shop to provide advice would be welcomed, to simplify the advisory sources available to the public.
- 4.2 There is little in the way of support for microgeneration/renewables in business at the moment and the strategy makes no commitments to any financial assistance for the implementation of small scale renewables. There is much interest in the Low Carbon Buildings Programme by business. An expansion of the scheme would boost the growth of small scale renewables until market forces and economics allow them to become self-sustaining and competitive with less sustainable alternatives.
- 4.3 While raising awareness campaigns can have an impact this is no substitute for ensuring improved interpretation and awareness of what consumers are using (as explained in chapter 4). The good practice that consumers can apply to save energy needs to be translated into the actual cost saving benefits and this is very difficult to assess under current practices applied by energy providers when billing customers.
- 4.4 The benefits of the Eco School Programme are fully recognised by West Lothian Council and all of its primary schools are now registered to achieve Green Flag status. The support of the Scottish Government for this innovative educational focus must be sustained. In addition the commitment to introduce the 'carbon footprint' into the programme is considered to be a realistic application of an educational tool with more meaning than when applied at other levels. The tool should be regarded in the strategy as an integral development of the Green Flag award.

5. Knowing What We Use (chapter 4)

- 5.1 The present standard energy recording and billing methods are archaic and any innovation that assists the interpretation and awareness of energy use in the home or workplace has to be welcomed. The use of smart meters, the interpretation of use patterns, carbon dioxide emission generated and linked advice on how savings can be made are not beyond the abilities of suppliers.

- 5.2 The matter of regulation on manufacturers of energy using products is at the EU and UK level but the Scottish Government must identify its role through procurement in the public sector and through its influence of the economic sector to eliminate energy inefficient products through regulation, where this might be applicable, or through advice. Improving the energy efficiency of products, while the priority, is not the only way this problem can be addressed.

6. Changing Our Buildings (chapter 5)

- 6.1 It is agreed that developers need to consider onsite generation of renewable energy at the design stage but, with the barriers that have to be overcome, this will not necessarily lead to the technologies being applied unless they are cost effective. Government will need to consider its role in encouraging the application of the technologies alongside industry, developers and planners.
- 6.2 To remove or reduce some of the planning requirements associated with installing microgeneration must be linked to the effectiveness of the technology. In many instances there will be factors that will reduce this and this will make it difficult to determine whether a particular microgenerator should be allowed as permitted development. For example, in an urban situation the effectiveness of a small scale, domestic wind turbine may be more of an environmental statement than one that has any impact on energy generation. The government has a responsibility to protect the public from the overselling of the benefits of microgeneration while the benefits in Scotland, for many of them, remain questionable.
- 6.3 As the technologies improve so building standards will need to be modified to accommodate them. Therefore, regular reviews will be necessary, as a matter of course.
- 6.4 While the council welcomes the help given to small scale and microgenerators to receive Renewable Obligation Certificates individual householders need to be encouraged to participate and the qualification levels reduced. This is the kind of direct action that the government can take to stimulate the application of the technologies.
- 6.5 The display of energy performance certificates by public sector organisations will not necessarily encourage the setting of more ambitious goals for enhancing energy performance. The drive to reduce energy bills will be what encourages this since what is spent on energy cannot be spent on delivering public services. It will be a public awareness act not necessarily one that influences change and the Executive will need to keep this under review. Further, the certificates will not reflect the operational cost of a building. Both asset and operational ratings should be displayed and the latter updated annually if the information is to be meaningful.

7. Improve Our Homes (chapter 6)

- 7.1 To encourage homeowners to be proactive in energy management requires the availability of information on the financial and carbon savings that could be made by investment in different types of energy efficiency. Yet, as is illustrated in the chapter, there is a high proportion of houses for which not all insulation methods apply. Nor would they be cost effective without the provision of incentives. Energy efficient standards will have to be delivered by a variety of mechanisms.

8. The Public Sector Leading by Example (chapter 7)

- 8.1 To achieve reductions in energy consumption by public bodies there is a reporting need if targets are to be monitored. This would also facilitate the measuring of achievement for future target setting. The Executive needs to work with local authorities to develop ways of monitoring, benchmarking and reporting. This is fundamental in relation to future action plan delivery.
- 8.2 The role that local authorities have to play is illustrated in the Scottish Climate Change Declaration. The adoption of an Energy Strategy by West Lothian Council has demonstrated both the challenge and the return through energy savings that can be made by the setting of targets and raising staff awareness.
- 8.3 The draft consultation strategy is surprisingly superficial in its overview of the role of local authorities, either as users of energy or as key influences through service delivery and raising public awareness.
- 8.4 It also inadequately explains the intention to set targets for reducing emissions, what these might be and how they are to be delivered. In itself this recognises that the voluntary approach may no longer be appropriate. The implications of performance measures need to be assessed and adequate consultation undertaken before being set, to enable councils to consider the implications as well as considering how to respond.
- 8.5 The council will welcome further guidance on how procurement can contribute to energy efficiency, as an important element of achieving higher standards. It is regarded as being both highly influential on manufacturers and suppliers as well as contributing to the response of local authorities to energy use efficiency.
- 8.6 The council broadly agrees with the conclusions of the McClelland Report. For councils to procure energy through collaboration there is a need for accurate consumption data being provided to potential suppliers. A consistent approach may not be reflected across different councils which could disadvantage those with good monitoring data. West Lothian Council strives to maintain accurate data but is aware that this is not reflected elsewhere.
- 8.7 Finally, on consultation on energy procurement it is advised that council energy officers are involved, not just procurement officers.

9. Conclusion

- 9.1 The council welcomes the general approach of the strategy in setting the context for the associated action plan to be published later this year. It is anticipated that the influence of the proposed UK Climate Change Bill and the proposals within the UK White Paper on Energy, announced on 22 May, will be reflected in this through their further impact on the strategy. However, it is for the Scottish Government to lead on this issue at the national level and the draft strategy generally describes the way forward.
- 9.2 The role of microgeneration remains unclear because of the barriers that exist to the widespread introduction of the various technologies. The emphasis on energy conservation and efficiency of use is the real focus of the strategy. Microgeneration is no substitute for the renewable energy sources that will be needed to serve Scotland's energy requirements. It is one element of the overall energy formula to meet these needs but, nevertheless, work is still required to remove the barriers that interfere with its potential value.