

Energy Efficiency & Microgeneration

**Achieving a low carbon future
A Strategy for Scotland**

Consultation Analysis Report

ACKNOWLEDGEMENTS

Thank you to all the respondents who took the time to respond to the consultation. Every reply has been examined thoroughly and every effort has been made to represent the wide range of views and opinions received.

1. INTRODUCTION

1.1 An Energy Efficiency Strategy was proposed in the Sustainable Development Strategy for Scotland, 'Choosing Our Future' published in 2005 and again in Scotland's Climate Change Programme: 'Changing Our Ways' which was published in 2006. The publication of a strategy was postponed until 2007 so that microgeneration could be included. Bringing together energy demand and small scale generation allows a more holistic approach to achieving a low carbon future for Scotland.

1.2 A draft Energy Efficiency and Microgeneration Strategy for Scotland was published for consultation in March 2007 (i.e. shortly before the elections in May 2007) in order to gather views from all sectors on current and future energy efficiency and microgeneration policy in Scotland. A total of 38 responses were received which have been analysed to produce this Consultation Analysis Report.

1.3 The Report consists of a breakdown of respondents followed by an analysis of the main findings from those responses. The Scottish Government is publishing a separate response to the issues raised during the consultation.

2. RESPONSES

2.1 The consultation attracted 38 responses from a range of groups, organisations and businesses. These are summarised in Table 2.1:

Table 2.1 Respondent type and response distribution

Type	No. of Responses	% of Responses
Individual	1	3
Local Authority	8	21
National Agency / Organisation	21	55
Environmental Group	2	5
Energy Business	4	11
Other	2	5

2.2 The largest group of responses came from national agencies and organisations. These have been further broken down in Table 2.2:

Table 2.2 National Agency / Organisation interest group further categorised by sector they represent.

Those representing / advising...*	No. of Organisations
Business and Industry	11
Individuals and Communities	8
Environment	2

*Some organisations may cover interests in more than one sector and in such cases, have been categorised here according to their primary function.

2.3 Of the eight Local Authority responses, six came from individual Local Authorities and two represented the collective views of the Scottish Energy Officers Network (SEON) and the Scottish HECA Officers Network (SHON).

2.4 Relatively few energy related businesses and environmental groups responded, one individual responded and the two uncategorised responses were received from a property developer and a private landlord.

2.5 The consultation asked for views and comments on energy efficiency and microgeneration policy development under chapter headings rather than asking specific questions and therefore the responses received did not follow a standard format. Additionally, each respondent did not comment on all of the sections of the consultation. A full breakdown of which respondents commented on which sections of the consultation is contained in Annex 1.

2.6 Where respondents gave permission, their individual responses have been published on the Scottish Government website at www.scotland.gov.uk/publications. All respondents are listed in Annex 2.

2.7 All non-confidential responses are available to the public in hard copy at the Scottish Government Library, K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD. Charges for photocopies are made on a cost recovery basis. To request copies by post, enquire about charges or make an appointment to view responses, please telephone the Library on 0131 244 4552.

3. MAIN FINDINGS AND ISSUES RAISED BY RESPONDENTS

3.1 The findings from the consultation are discussed under the eight chapter headings of the consultation document: Setting the Scene; Energy Use in Scotland; Changing Our Behaviour; Knowing What We Use; Changing Our Buildings; Improving Our Homes; Public Sector Leading By Example and Next Steps. As a significant volume of comments were received on matters specific to microgeneration, these are discussed under a separate heading.

Chapter 1: Setting the Scene

Decentralised energy

3.2 The topic that attracted the most interest in this chapter was decentralised or community energy, with 13 respondents offering comments. All of the respondents agreed on the benefits of decentralised energy, but felt that these were under-represented in this consultation. Five respondents highlighted the need for assessment to identify strategic direction, investment required and any barriers. A further four suggested incentives to encourage uptake, including thermal Renewables Obligation Certificates (ROCs), permitted development rights, local taxation relief and a low interest loan scheme.

Setting targets

3.3 Of the 13 respondents, ten agreed that setting targets for energy efficiency and reductions in demand for energy could be effective provided they were based on a sound statistical base. They also felt that the targets should be achievable, supported both financially and in policies, flexible to allow for progress year on year, expressed in the form of carbon savings and reported on and debated in Parliament annually. However, one respondent commented that such targets should not be mandatory as this may lead to token actions and untrue figures being reported at the expense of actual improvements.

Renewable heat and transport

3.4 11 respondents felt that a Renewable Heat Strategy should have been aligned with this consultation document. A further three felt that transport should have been incorporated.

Chapter 2: Energy Use in Scotland

3.5 The three respondents who commented on this chapter all agreed that more and regular monitoring of energy use is crucial and that a sound statistical baseline should be established as soon as possible.

Chapter 3: Changing Our Behaviour

“One Stop Shop” advice

3.6 The issue that attracted the most interest across the consultation was the establishment of a series of ‘one-stop-shop’ advice centres for consumers. In total, 27 respondents commented with 25 in support of this approach and two who were concerned that it would diminish the resources available to the current network of Energy Efficiency Advice Centres (EEACs).

3.7 Those who were supportive of a ‘one-stop-shop’ felt that it would reduce confusion amongst consumers and would provide easily accessible, consistent, clear and up to date advice.

3.8 These respondents felt that the new approach should build on the existing EEAC network and retain their local knowledge and contacts but that it should have clear indication that the initiative is being led by the Scottish Government. They also felt that the staff of the current EEACs would require further training if they are to deal with all sustainable energy issues.

3.9 The respondents also suggested specific services the advice centres should offer and these included: a clearing house for grants; advice and support on loans for householders and SME’s and personal advisers who are fully trained to deal with all sustainable energy issues.

Raising awareness

3.10 A third of all respondents commented on the importance of awareness raising. They felt that sustained educational initiatives would strengthen understanding of the role of energy efficiency and microgeneration in reducing emissions and would help individuals and organisations understand and measure their impact on climate change. One respondent commented that the proposals for

influencing consumer behaviour by awareness raising described in the consultation were insufficient.

Incentives

3.11 Five respondents agreed that measures such as tradable carbon allowances, council tax rebates, comparisons with other developed countries and community level carbon reduction targets would encourage consumers to reduce their energy demand.

Financial support for SMEs

3.12 The issue of financial support for SMEs i.e. Loan Action Scotland attracted comments from nine respondents all of whom agreed that this should not only continue, but should be expanded, retain a five year payback, include microgeneration and be more effectively marketed with face to face visits for smaller SMEs.

Review of energy efficiency and microgeneration support

3.13 Five respondents commented that they agreed on the need for a review of energy efficiency and microgeneration support in Scotland in order to identify any gaps or overlaps.

Prioritising energy efficiency

3.14 The majority of respondents agreed that energy efficiency and reducing demand for energy should be given priority over the installation of microgeneration technologies.

Chapter 4: Knowing What We Use

Metering and billing

3.15 All of the 18 respondents who commented on this chapter agreed that information provided to energy users should be transparent and unambiguous. One suggested that fuel bills should be clearer whilst the others felt this could be achieved through smart meters.

3.16 They suggested that a UK-wide roll out of smart meters should involve the utility suppliers at all stages and should be accompanied by a high profile awareness

and education campaign with linked advice on savings and follow up support for action.

3.17 It was also suggested that meters should have meaningful displays for consumers and should be capable of being read and recalibrated remotely.

3.18 One respondent did not agree with the UK Government's white paper proposal that suppliers should provide customers with stand alone monitors that display information on electricity use prior to a roll out of two way smart meters which would allow both the consumer and supplier to monitor energy use. They felt that this would undermine the case for the long-term wide-scale and rapid roll out of full smart meters.

Chapter 5: Changing Our Buildings

Building standards

3.19 12 respondents commented on building standards with most welcoming the new standards introduced in May 2007. However four felt that Scotland was still behind other European countries and should be brought into line with, for example, those in Scandinavia.

3.20 Three respondents raised concerns about current standards not being met and non-compliance not being adequately policed. To address this, it was suggested that the new standards should be accompanied by an inspection and enforcement regime alongside ring-fenced funds for Local Authority building control officers. It was suggested by two other respondents that random air tightness testing or thermal imaging could assess compliance and by another, that builders as well as owners should be prosecuted if buildings don't comply.

3.21 It was suggested by two respondents that making the building industry aware in advance of higher building standards was necessary in order to give the market certainty and allow industry time to prepare.

Energy performance certificates

3.22 12 respondents were in favour of the Energy Performance Certificates (EPCs) being introduced by the European Performance of Buildings Directive (EPBD). They felt that the EPCs were a good starting point for future improvements and would increase the efficiency of buildings. However, it was felt that they should be clear, meaningful, include information on energy use and should be complimented by mandatory audits.

3.23 These respondents also felt that an awareness campaign was required to give value to a favourable rating, help users interpret the information on the EPC and signpost them to further help and advice.

3.24 Five respondents however, were not in favour of the introduction of EPCs, commenting that as they do not contain information on energy use, they will neither encourage improvement of building performance nor result in significant improvements in energy efficiency.

New buildings

3.25 On the issue of new buildings, six respondents felt that this was an opportunity for building regulations to incorporate energy efficiency and microgeneration in the design phase with one highlighting the need to tighten building controls to ensure these regulations are met. Another commented that microgeneration is far more effective when installed on a building which has effective energy efficiency technologies installed.

Existing building stock

3.26 Of greater concern though was the condition of existing building stock in Scotland and 11 respondents suggested this should be given higher priority and significantly more support than is currently received. It was suggested that financial measures such as a ring-fenced carbon reduction programme through the provision of grants, regulatory responsibility on energy suppliers and integration of existing funding schemes could draw in the additional resources required for the most expensive to treat buildings.

3.27 It was also suggested that new building regulations should tackle the existing building stock and that increased standards could be enforced when a property is refurbished.

Carbon neutral buildings

3.28 Seven respondents were supportive of targets for carbon neutral buildings, although the suggestions ranged from zero carbon heating in new homes by 2015 to overall carbon neutral housing by 2030. In order to meet targets though, it was highlighted that they would need to be supported by: robust and clear policies; research; software; new building regulations; investment and training in low carbon technologies for building design professionals.

Renewables Obligation Certificates

3.29 Renewables Obligation Certificates (ROCs) attracted comments from 12 respondents who all agreed that reducing the qualification to include individual households could stimulate the application of microgeneration technologies. Two respondents highlighted that if this was to be the case, the process for obtaining and trading ROCs should be streamlined and simple to administer. Another two suggested financial support such as loans repayable through ROCs and improved export prices would encourage uptake.

Support for changing buildings

3.30 11 respondents commented that making buildings more energy efficient and encouraging greater uptake of microgeneration would require advice and financial support. In terms of advice, they suggested that a 'support toolkit' for setting goals and reporting on progress as well as guidance on best practice would be helpful.

3.31 In relation to financial support, two comments were that the present situation was confusing as funding comes from a number of bodies and the application process for grants is lengthy and has no guarantee of success. Other suggestions for financial support are as follows:

- Fiscal measures such as council tax rebates should be offered to those who have installed energy efficiency or microgeneration technologies
- Funding and maximum grant for the Scottish Community and Householders Renewables Initiative (SCHRI) should be increased. The extra £2 million promised is unlikely to be enough
- Long term, substantial grant funding should replace SCHRI
- SCHRI should be compatible with new Carbon Emissions Reduction Target (CERT) mechanisms
- Additional funding should be put into the Biomass Support Scheme
- Low interest loans should be introduced for district energy schemes
- Businesses require further incentives as they may be operating on the margins of economic viability and do not have resources to invest in new technologies
- The nature of a householder's tenure should be irrelevant when applying for grant support

Fuel poverty

3.32 Of the nine respondents who commented, all welcomed the Scottish Government's commitment to end fuel poverty by 2016. Several suggestions were made on how this could be achieved including: energy efficiency measures should be widely installed before considering microgeneration; microgeneration technologies could be used in off-gas and hard to treat properties; there should be coordination between the Scottish Government's fuel poverty schemes and the suppliers Energy Efficiency Commitment (EEC); merging private sector housing grants with fuel poverty measures would help poorer householders improve the energy efficiency of their homes and eligibility of fuel poverty schemes should be widened to include other fuel poor groups currently missing out.

Energy Efficiency Commitment and Warm Deal

3.33 Further to this, eight other comments were received specifically about EEC and the Warm Deal programme. One respondent felt that the Warm Deal would be better targeted at private landlords whose tenants are in fuel poverty to avoid any overlaps with EEC, whilst another felt that EEC monies would be better directed at Warm Deal. Two other respondents suggested that the product set covered by EEC should be extended to include renewable heating technologies and a third urged the Scottish Government to ensure it is receiving its fair share of EEC funding.

Energy efficient homes

3.34 Improving homes with energy efficiency measures attracted comments from 15 respondents. All 15 agreed that this could make a major contribution to a low carbon economy. It was suggested that targets be set for energy efficiency in homes both for new developments and existing properties and that the private rented sector be included.

3.35 It was felt though, that to ensure targets are met, support mechanisms and incentives would have to be put in place. Amongst the suggestions were council tax rebates, a combined grant and low interest loan scheme and a good practice forum consisting of developers, architects and housing providers being developed across the UK. One respondent highlighted the need for further research into housing previously thought to be unsuitable for conventional insulation.

National Home Energy Ratings

3.36 Two respondents commented on the National Home Energy Rating, both agreeing it should be amended and one suggesting the minimum should be seven for all Scottish homes.

Chapter 7: Public Sector Leading By Example

Central Energy Efficiency Fund

3.37 Commenting on the Public Sector Central Energy Efficiency Fund (CEEF), 13 respondents agreed that the scheme had been beneficial. However, they would like to see several improvements including a more streamlined application process, the inclusion of renewables and smart meters, greater awareness raising and additional funding.

Public sector procurement

3.38 Eleven respondents commented on the contribution public sector procurement can make to energy efficiency. Of the 11, two felt that there should be targets for the procurement of renewable supplies and microgeneration and another that procurement processes could be used to eliminate energy inefficient products.

3.39 The most important issue for those who commented though, was on procurement of energy. It was felt by five of the respondents that this needs technical input from the local authority energy officers. They also highlighted that if energy is to be procured for all 32 local authorities as a consortium then accurate consumption data would be required to secure the best possible price.

Eco Schools

3.40 Nine respondents agreed that the Eco Schools programme was worthwhile and could help to deliver long term behavioural change. Some also felt that it should be embedded in the curriculum and others that it should focus more on energy use and include the idea of a 'carbon footprint'. Four respondents felt that school buildings could be used to teach students about energy efficiency and microgeneration if they were involved in energy saving measures relating to building design, heating and lighting.

Public Private Partnerships

3.41 All six respondents who commented on Public Private Partnership (PPP) projects thought that they did not encourage delivery of sustainable public buildings. They felt this was due to contractors being unwilling to take on liability for energy efficiency and microgeneration technologies. It was suggested this could be resolved with the setting of funding conditions for PPP projects which include sustainability elements.

Leading by example

3.42 A quarter of all respondents welcomed the commitment that the public sector would lead by example for a transition to a lower carbon footprint. They felt that, as well as the Scottish Government's own estate, this should include agencies, NDPBs, schools and NHS Trusts and that staff should be encouraged to play their role in reducing their carbon emissions.

3.43 They highlighted though, that the climate change declaration hasn't yet had an impact on the majority of public sector decision making or on the attitudes and behaviours of public sector employees and, as there is currently no mandate for action, it has been difficult to justify resources to deliver objectives.

Environmental targets

3.44 In terms of setting environmental targets for the public sector, most of the eight respondents who commented on this topic agreed that any such targets should be applied to all public bodies and should be regularly monitored and reported against benchmarks. One respondent felt that this consultation failed to adequately explain what the targets would be and how they could be achieved. Others suggested that the Scottish Government should consult with other public bodies before any targets were set and should offer incentives to help prioritise spending.

Carbon Management

3.45 On the topic of Local Authority Carbon Management, three respondents felt that it was a very positive initiative and that all local authorities should participate. One respondent commented though, that it cannot guarantee implementation of its action plans as competition for resources often undermines commitment.

Chapter 8: Next Steps

3.46 Ten respondents welcomed the idea of an energy efficiency and microgeneration action plan.

3.47 However, most of the respondents felt that the measures described were not ambitious enough and needed to be strengthened given the scale of the problem, particularly for the business sector.

Microgeneration

3.48 Although briefly discussed within previous chapters, particularly chapter 5 paragraphs 3.29 – 3.31, the volume of comments received on matters specific to microgeneration was such that a separate section in the report is necessary to fully examine the issues raised. The comments have been collated under four topics: Targets; Barriers to uptake; Support and incentives; and Impacts.

Targets

3.49 Targets for microgeneration were welcomed by nine of the ten respondents who commented on them. It was suggested that any current targets should be assessed in the first instance and if more needs to be done then projecting future energy demand could help determine new targets. It was also felt that targets for renewable heat and zero carbon buildings should be included and that a benchmarking exercise was required to measure energy use reduction against microgeneration installation. Two respondents highlighted that any targets should be supported by complete, holistic and robust policies to welcome investors to the Scottish market.

3.50 The respondent, who did not agree with target setting for microgeneration, felt that the Scottish Government should only set and enforce carbon emissions reductions and give consumers flexibility in how to achieve them.

Barriers to uptake

3.51 One of the main barriers to uptake of microgeneration identified by the respondents was planning restrictions. Of the 17 respondents who commented on barriers, seven wanted to see changes to the planning system to make it easier to install microgeneration. Other potential barriers included: the cost of the

technologies and the fact that their benefits are unproven; a weak power distribution system in Scotland and a potential skills shortage in installers and manufacturers.

Support and incentives

3.52 To overcome these barriers, various mechanisms of support were suggested by 21 respondents. Firstly, to assist with the cost of the technologies and their installation, nine respondents agreed that Government support in the form of increased grants of up to 40% of the cost and council tax rebates for those installing microgeneration should be offered. Another respondent felt that compulsion on new build and public procurement would help to bring down costs.

3.53 One respondent would like to see Government encouraging support for the development and commercialisation of indigenous renewable technologies to grow the supply chains.

3.54 To address the issue of unproven benefits, it was suggested that there should be sustained support for research and development into microgeneration and other technologies such as community scale of micro combined heat and power (CHP).

3.55 In terms of a weak power distribution system, one respondent highlighted that there is currently an opportunity to replace the present supply network with a more microgeneration-friendly system.

3.56 Eight respondents felt that a potential skills shortage could be addressed by the establishment of a competent and trained installer and technician base in Scotland. It was suggested that this base be supported by an information resource for installers and manufacturers to engage with each other and promote best practice.

Impacts

3.57 Five respondents highlighted potential negative impacts of microgeneration. Larger scale microgeneration projects could have an impact on natural heritage especially for bats, freshwater ecology and areas near to sensitive bird populations. Safeguards should be put in place and suggested nationwide base information of what areas are suitable for microgeneration would be welcomed. Three of the respondents felt that the impact on human health and local air quality from biomass schemes have been overlooked as wood burning is a major source of toxic poly aromatic hydrocarbons.

ANNEX 1 – Consultation Summary Report

4. Setting The Scene

4.1 Target setting

No.	Comments	Names
11	<ul style="list-style-type: none"> • progress reports • robust methodology • based on a sound statistical base • demand reduction • flexible to allow for progress made year on year • achievable and accompanied by incentives where they will have a financial impact on businesses. • policies must be put in place to ensure targets are met • expressed in the form of carbon savings • complement national or long term targets • additional sectoral targets • annual debate in parliament on progress • set around Key Performance Indicators (KPIs) • backed up by financial and staff resources • remain targets without becoming mandatory • may lead to tokenism & statistic fiddling at the expense of actual improvements • needs significant support in understanding how to calculate carbon equivalents and to support planned approaches to implement reduction • medium & long term targets to ensure progress is made quickly and to establish a clear signal that investment in energy efficiency & microgen will be rewarded 	<ul style="list-style-type: none"> • Highlands & Islands Enterprise • Scottish Natural Heritage (SNH) • South Ayrshire Energy Agency • Scottish Renewables • The Scottish Rural Property & Business Sector • Energy Saving Trust • Friends of Earth / Association for the Conservation of Energy • Scottish Water • Edinburgh Council • Changeworks • Scottish Environment Protection Agency (SEPA)

4.2 *Renewable heat strategy*

No.	Comments	Names
11	<ul style="list-style-type: none"> • incorporated into this one and included in the action plan 	<ul style="list-style-type: none"> • Scottish Energy Officer's Network (SEON) • North Lanarkshire Council • Scottish National Heritage • West Lothian Council • Scottish HECA Officers Network (SHON) • Forward Scotland • Sustainable Development Education (SDE) • Changeworks • Scottish Renewables • Kilmartin Property Group • South Ayrshire Energy Agency

4.3 *Decentralised / community energy*

No.	Comments	Names
13	<ul style="list-style-type: none"> • poor understanding of the extent of actions and measures required • barriers have never been adequately addressed • should be developed wherever suitable • clear links between this strategy & the Decentralised Energy Strategy • need permitted development rights or local taxation relief's to give incentive 	<ul style="list-style-type: none"> • South Ayrshire Council • Forward Scotland • Changeworks • The Scottish Rural Property & Business Sector

	<ul style="list-style-type: none"> • economic benefits to the whole community • supported with additional funding • supported i.e. through a thermal Renewable Obligation Certificate • greater efficiencies of scale • advice on establishment, management & operation of energy services companies for promoting decentralised energy • requires assessment to identify possible strategic direction & investment needs. • credit guarantee /low interest loan scheme that allows larger district heating & Combined Heat and Power projects to raise finance • decentralisation would in most situations find a 'best value' level. It allows the integration of several technologies to work together, greater economies of scale, higher likelihood of proper maintenance, less cycling of equipment • energy supply regulation has to be reviewed to allow for confident investment in community schemes where these are determined to be the best value approach • disappointed that small & large scale community schemes were not properly represented 	<ul style="list-style-type: none"> • Chartered Institute of Housing • Scottish Water • Kilmartin Property • City of Edinburgh Council • West Lothian Council • South Ayrshire Energy Agency • Business Environment Partnership • Scottish Renewables • SHON
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4.4 Transport

No.	Comments	Names
3	<ul style="list-style-type: none"> • carbon savings made will mean very little if the issue of sustainable transport is not addressed • welcome proposals to link microgen & transport 	<ul style="list-style-type: none"> • Aberdeen Campaign Against Climate Change • SEPA • Scottish National Heritage

4.5 *Strategy, carbon & climate change*

No.	Comments	Names
6	<ul style="list-style-type: none"> • 60% carbon dioxide reduction needs to be the driving force of the Strategy and Action Plan • set out the step by step achievements that will have to be made to reduce carbon dioxide or on the phasing of targets that will be required on 5 year cycles to meet them • welcomes assessment of carbon savings on the Scottish Executive's actions • initiatives should be measured in carbon so progress on climate change can be reported on 	<ul style="list-style-type: none"> • West Lothian Council • South Ayrshire Energy Agency • Scottish Renewables • EDF Energy • Royal Environmental Health Institute • City of Edinburgh Council

5. **Energy Use in Scotland**

5.1 *Measuring energy use*

No.	Comments	Names
3	<ul style="list-style-type: none"> • more & regular monitoring is required • current measurements of energy improvements & carbon reductions bear no relation to the actual situation • systematic statistical research should begin as soon as practicably possible • set baseline and measure progress 	<ul style="list-style-type: none"> • South Ayrshire Council • South Ayrshire Energy Agency • Scottish Renewables

6. Changing Our Behaviour

6.1 One stop shop

Support

No.	Comments	Names
25	<ul style="list-style-type: none"> • not be limited to householders • marketed with clear indication that initiative is lead by Scottish Executive • reduce confusion • increase awareness of the benefits of energy efficiency and microgen • weighting system needs to be applied which recognises the needs of each area • staff training in the Sustainable Energy Networks is crucial • help to match progress made in industry • retain high quality local provision • must offer a clearing house for grants • loans for SMEs and commitment of a further £2 million loan fund • local knowledge & delivery is essential • include microgen • priority should be given to energy efficiency as a first step, followed by microgen • community based approach • done alongside an awareness raising campaign • easily accessible, consistent, clear and up to date energy efficiency advice • build on the existing network of Energy Efficiency Advice Centres (EEACs) • allocate each client a personal adviser who is fully trained to deal with all sustainable energy issues and how to motivate & inspire people to change their behaviour • incorporate services from both Energy Saving Trust & Carbon Trust 	<ul style="list-style-type: none"> • Alan Kennedy • SEON • Energy Action Scotland • Wise Group • SHON • West Lothian Council • South Ayrshire Energy Agency • Forward Scotland • SDE • Highlands & Islands Community Energy Company • Aberdeen City Council • Scottish Renewables • Business Environment Partnership (BEP) • Scottish Gas • Energy Saving Trust • Fife Council

	<ul style="list-style-type: none"> inclusion of Scottish Community and Householder Renewables Initiative advice for SME's & domestic consumers 	<ul style="list-style-type: none"> Friends of Earth / Association for the Conservation of Energy Scottish Water Edinburgh Council SEPA Highlands & Islands Enterprise Dormont Estate Changeworks EDF Energy Kilmartin Property Group
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Does not support

No.	Comments	Names
2	<ul style="list-style-type: none"> will not be achievable unless all concerned parties across Scotland are coordinated to follow the same lines of action not necessarily the answer more local advice is more effective as funding differs in each of the 32 Local Authority areas cannot support proposal if it reduces front line service provision not threaten or duplicate community based approach that already exists may divert resource allocation from more distant or rural areas pockets of extreme need will be sacrificed for a structure based solely on advice and without directly maximising measures or directing grant funding. 	<ul style="list-style-type: none"> South Ayrshire Council SHON

6.2 Support for SMEs

No.	Comments	Names
9	<ul style="list-style-type: none"> • Loan Action Scotland to be expanded • more marketing for Loan Action Scotland needed • face to face visits to smaller SMEs • more support for the uptake of microgen by businesses • practical support and financial assistance is required for SMEs to implement energy saving recommendations • money for Loan Action Scotland should be considerably expanded • single, well marketed point of contact with local delivery for advice & support • need for further explanation on the assumptions & calculations for targets & benefits of future Loan Action Scotland funding • welcome additional funding & doubling of max loan in Loan Action Scotland • payback should remain at 5 years • scheme should be expanded with marketing targeted at SMEs 	<ul style="list-style-type: none"> • Royal Institution of Chartered Surveyors • Highlands & Islands Enterprise • Wise Group • West Lothian Council • Scottish Renewables • BEP • Fife Council • Scottish Water • Friends of Earth / Association for the Conservation of Energy

6.3 Awareness raising

No.	Comments	Names
13	<ul style="list-style-type: none"> • sustained educational initiatives promoting individual and community responsibility for energy conservation • promotion of best practice • not enough proposals for changing consumer behaviour in the Strategy • good practice that consumers apply needs to be translated into actual cost saving benefits • if growing enthusiasm for microgen meets prohibitive installation costs, there will be widespread dissatisfaction 	<ul style="list-style-type: none"> • The Institution of Engineering & Technology • Scottish National Heritage • SHON • West Lothian Council • South Ayrshire Energy Agency.

	<ul style="list-style-type: none"> • awareness of energy efficiency of products and ecological footprint of goods & services • schools provide a useful community focus • strengthen the understanding of energy efficiency and microgen's role in tackling climate change • help individuals & organisations understand and measure their affect on climate change • more focussed education & awareness programmes aligned with Eco Schools • Installing microrenewables on school buildings is encouraged 	<ul style="list-style-type: none"> • Forward Scotland • SDE • Changeworks • Scottish Renewables • Energy Saving Trust • Chartered Institute of Housing • Kilmartin Property Group • SEPA
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6.4 Review of energy efficiency & microgeneration support in Scotland

No.	Comments	Names
5	<ul style="list-style-type: none"> • should include microgen • need for a standard to govern the provision of advice and endorsement of products & services • inform how the SEN is taken forward as different models will work in different regions 	<ul style="list-style-type: none"> • Highlands & Islands Enterprise • Scottish Renewables • Scottish Gas • Energy Saving Trust • City of Edinburgh Council

6.5 Incentives

No.	Comments	Names
5	<ul style="list-style-type: none"> • domestic, tradable carbon allowances should be introduced • Scotland should be compared to other developed countries to encourage them to achieve more • legislate to an ambition to at least match the reductions achieved by other countries • council tax rebates for home owners greening their homes • carbon reduction in the community a target for Local Authorities so that privately owned houses 	<ul style="list-style-type: none"> • Royal Institute of Chartered Surveyors • Energy Saving Trust • National Insulation Association

	<ul style="list-style-type: none"> are included personal carbon allowances 	<ul style="list-style-type: none"> Fife Council South Ayrshire Council
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6.6 Market transformation

No.	Comments	Names
9	<ul style="list-style-type: none"> need a workforce skilled in the use, installation and maintenance of low carbon technologies expand energy from renewables but only where this minimises impact on natural heritage expansion of The Low Carbon Building Programme would boost the sector until market forces allow them to become self-sustaining and competitive welcomes development & implementation of green jobs, especially in renewables sector Need new, rigorous measures current subsidies & grants cannot be provided at a scale sufficient to effect necessary changes encourage greater efficiency in consumer products Add to microgen section 	<ul style="list-style-type: none"> Institute of Engineering & Technology Scottish Natural Heritage West Lothian Council BEP Fife Council Highlands & Islands Enterprise South Ayrshire Council Changeworks Kilmartin Property Group

7. Knowing what we use

7.1 Metering & billing

No.	Comments	Names
18	<ul style="list-style-type: none"> domestic fuel bills should be clearer need clear & unambiguous information about energy use accompanied by a high profile customer awareness and education campaign smart meters should be able to be read & recalibrated remotely 	<ul style="list-style-type: none"> Royal Institute of Chartered Surveyors Energy Action Scotland Institute of Engineering &

<ul style="list-style-type: none"> • have meaningful display for the householder • welcome free usage meters being distributed under Energy Efficiency Commitment (EEC), should be a similar device for gas • linked advice on savings to be made • rolled out to homes, businesses & public sector as soon as possible • do not agree with UK Government's white paper proposal that prior to roll out of smart meters, suppliers should provide customers with stand alone monitors that display information on electricity use • develop 2-way communication smart meters • must also be follow up support for action • mandatory UK-wide roll out of smart meters • utility suppliers should be involved at all stages 	<p>Technology</p> <ul style="list-style-type: none"> • Highlands & Islands Enterprise • SHON • South Ayrshire Council • West Lothian Council • Forward Scotland • SDE • Aberdeen City Council • EDF Energy • Scottish Gas • Energy Saving Trust • Fife Council • Friends of Earth / Association for the Conservation of Energy • Scottish Water • Kilmartin Property Group • Edinburgh Council
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8. Changing Our Buildings

8.1 Building standards

No.	Comments	Names
12	<ul style="list-style-type: none"> • brought into line with the best European standards • accompanied by an inspection and enforcement regime • more needs to be done to tackle existing stock • improvement in energy efficiency • higher standards should be expected in the future and the industry should be made aware of this • standards are not always being met and this needs to be adequately policed. • lesser standard should be applied to existing stock • regular reviews will be required as the technologies improve • welcome plans to use thermal imaging to assess compliance • local building control officers require additional resources in order to help them ensure maximum compliance • more will need to be done • more in line with other countries such as in Scandinavia • targets for energy efficiency & microgen are welcomed if it cascades down to building standards • forward plan on how building standards will be improved will give market certainty and the industry time to prepare • Scotland is still 30 years behind the best in Europe • give Local Authorities access to ring-fenced funds to ensure better compliance • random air tightness testing • builders should be prosecuted alongside owners if buildings do not comply 	<ul style="list-style-type: none"> • Institute of Engineering & Technology • Royal Institute of Chartered Surveyors • Wise Group • South Ayrshire Council • West Lothian Council • Aberdeen Campaign Against Climate Change • South Ayrshire Energy Agency. • Changeworks • Aberdeen City Council • Scottish Renewables • Fife Council • Friends of Earth / Association for the Conservation of Energy

8.2 The EU Energy Performance of Buildings Directive (EPBD) & Energy Performance Certificate (EPC)

Support

No.	Comments	Names
12	<ul style="list-style-type: none"> • campaign is required to ensure public are fully aware of their duties and how to interpret the information on the Energy Performance Certificate • make a contribution in providing information on carbon & fuel costs • Energy Performance Certificates must be understandable and meaningful to intended users and contain information on energy use • will increase efficiency of buildings • should be applied to all buildings to allow the Energy Performance Certificate to act as a benchmark • good starting point for future improvements • asset & operational ratings should be displayed and the latter updated annually • indicate energy costs during purchase or rental of properties? • welcome extension of Energy Performance Certificates to business premises • value must be placed on having a favourable certification • mandatory audits to complement Energy Performance Certificates • on all buildings by spring 2008 • Energy Performance Certificates should be as user friendly as possible • should sign post consumers to sources of further help & advice i.e. EEACs. 	<ul style="list-style-type: none"> • Royal Institute of Chartered Surveyors • Energy Action Scotland • Highlands & Islands Enterprise • Wise Group • South Ayrshire Energy Agency • Changeworks • Scottish Renewables • BEP • The Scottish Rural Property & Business Sector • Friends of Earth / Association for the Conservation of Energy • Kilmartin Property Group • Energy Saving Trust

Does not support

No.	Comments	Names
5	<ul style="list-style-type: none"> • does not encourage improvement of building performance • no obligation on householders to act on this so further measures are required • will not result in significant improvements in energy efficiency • will not encourage setting of ambitious goals • will not drive performance improvements unless there are mechanisms of compliance checking & sanctions for non display 	<ul style="list-style-type: none"> • SEON • North Lanarkshire Council • South Ayrshire Council • West Lothian Council • Fife Council

8.3 New buildings

No.	Comments	Names
6	<ul style="list-style-type: none"> • new development should be energy efficient & high in density around transport development areas • decisive measures need to be put in place to promote the use of cost effective materials and technologies in both new & existing buildings. • support new building standards for new builds • provide financial and other incentives to improve energy efficiency and encourage uptake of microgen in both new builds & existing stock • new homes to include a minimum of energy produced on site • Permitted development rights for all forms of renewables & microgen in both new housing & existing stock • strengthen building controls to ensure new homes are actually built to design & specification on plans • welcome support of building regulations for increased energy standards of new build • new buildings should incorporate energy efficiency as standard. 	<ul style="list-style-type: none"> • Royal Institute of Chartered Surveyors • Institute of Engineering & Technology • Aberdeen City Council • EDF Energy • BEP • Scottish Gas

8.4 Existing stock

No.	Comments	Names
11	<ul style="list-style-type: none"> • concerned about condition of existing housing stock particularly in the private owner & rented sectors • solid wall properties in areas off gas should be given the highest priority • integration of existing funding schemes could be used to draw in the additional funding required for the most expensive to treat houses • The Scottish Housing Quality Standard will help, but more can and should be done • significantly more work is required to increase energy efficiency & energy supply options for existing housing. • support should be significant & realistic • encourage increased standards when properties are refurbished • biggest challenge is tackling energy waste in the existing housing stock • insulation is the most cost-effective • ring-fenced carbon reduction programme through the provision of grants or regulatory responsibility on energy suppliers • new building registrations do not address stock of existing buildings • provide guidance on targets for refurbishment of existing buildings, for developments of less than 500 sq.m and set out future increases in targets • energy performance of existing stock should be raised. 	<ul style="list-style-type: none"> • Energy Action Scotland • The Institute of Engineering & Technology • Wise Group • Changeworks • Aberdeen City Council • Scottish Renewables • National Insulation Association • Fife Council • Friends of Earth / Association for the Conservation of Energy • The Scottish Rural Property & Business Sector • Aberdeen Campaign Against Climate Change

8.5 Carbon neutral buildings

No.	Comments	Names
7	<ul style="list-style-type: none"> • favour introduction of carbon neutral building standards • 'passive house' found in Germany & Austria should be replicated in Scotland 	<ul style="list-style-type: none"> • Royal Institute of Chartered Surveyors

	<ul style="list-style-type: none"> • building design professionals need in-depth training • deliver zero carbon energy use in all buildings by 2016 • new homes to be zero carbon by 2017 • new build housing: zero carbon heating by 2015/16 & overall zero carbon housing by 2030 • needs robust & clear policy, research & a support framework • software & building registrations to be developed to accommodate technology & methods • training & investment in low carbon techs • targets in line with English Zero Carbon • emissions from buildings to be reduced by min 3% per annum 	<ul style="list-style-type: none"> • Wise Group • South Ayrshire Council • Scottish Renewables • Energy Saving Trust • Friends of Earth / Association for the Conservation of Energy • Chartered Institute of Housing
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8.6 Renewable Obligation Certificates

No.	Comments	Names
12	<ul style="list-style-type: none"> • reduce the qualification level of Renewable Obligation Certificates so individual households could be eligible • lobby for improved export prices from renewables • could stimulate the application of these technologies • target should be increased to 15–20%. • continual readjustment of the Renewables Obligation scheme does not improve confidence • process for obtaining & trading Renewable Obligation Certificates for small scale producers should be streamlined • change criteria for Renewable Obligation Certificates to include microgen, but programme should remain simple to administer • Loan scheme should be established alongside this, with installation costs being repaid through Renewable Obligation Certificates 	<ul style="list-style-type: none"> • SEON • North Lanarkshire Council • West Lothian Council • South Ayrshire Energy Agency • Changeworks • Aberdeen City Council • Scottish Renewables • Scottish Water • Kilmartin • Wise Group • Fife Council

	<ul style="list-style-type: none"> • either easier access to Renewable Obligation Certificates or feed-in tariffs as in Germany & Spain 	<ul style="list-style-type: none"> • Friends of Earth / Association for the Conservation of Energy
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8.7 Support for changing buildings

No.	Comments	Names
11	<ul style="list-style-type: none"> • 'support toolkit' to set more ambitious goals and what progress has been made to reach them. • fiscal measures such as council tax rebates should be introduced to encourage uptake of energy efficient measures • guidance on best practice for the provision of grants to install microgen and repayment times and projected savings should be readily available • extra £2m for Scottish Community and Householder Renewables Initiative is unlikely to be enough • nature of the householders tenure should be irrelevant when applying for grant support • welcomes additional funding for Scottish Community and Householder Renewables Initiative • longer term substantial investment is required to maintain enthusiasm and assist with market transformation • longer term & more substantial grant programme would be preferable for Scottish Community and Householder Renewables Initiative • Scottish Community and Householder Renewables Initiative should be compatible with new Carbon Emissions Reduction Targets (CERT) mechanism • should incentivise renewable heating technologies • single point of contact for climate change advice to share best practice & innovation • the Low Carbon Building Programme application could be easier with better instruction on how much has been awarded and how to access this 	<ul style="list-style-type: none"> • SEON • North Lanarkshire Council • Royal Institution of Chartered Surveyors • Dormont Estate • Wise Group • Forward Scotland • Changeworks • BEP • The Scottish Rural & Property Business Association • Energy Saving Trust • Friends of Earth / Association for the Conservation of Energy

	<ul style="list-style-type: none"> • welcome additional funding to Biomass Support Scheme • further financial incentives should be made available: Loans (LAS); grants (SBSS & LCBP); low interest loans for district energy products; tax allowances on low carbon buildings • need incentives to encourage businesses to invest in energy efficient as many will be operating on margins of economic viability and do not have resources to invest • fiscal incentives to encourage development & purchase of low carbon homes • increase in Scottish Community and Householder Renewables Initiative funding to £14.8m per year • double maximum grant • new major funds for upgrading existing buildings should be created • Scottish Community and Householder Renewables Initiative application forms are time consuming with no guarantee of success • confusing that funding comes from a number of bodies 	
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9. Improving Our Homes

9.1 Fuel poverty

No.	Comments	Names
9	<ul style="list-style-type: none"> • to meet fuel poverty targets, more investment, awareness and infrastructure is needed • microgen could make a contribution to the eradication of fuel poverty in off-gas and on hard to treat properties • coordination between Scottish Executive's fuel poverty schemes and suppliers' EEC would help to meet fuel poverty targets by 2016 • energy efficiency can help to end fuel poverty with microgen being considered at the planning stage • supports commitment to end fuel poverty by 2016 	<ul style="list-style-type: none"> • Energy Action Scotland • Wise Group • South Ayrshire Energy Agency • Changeworks • Energy Saving Trust • Fife Council • Friends of Earth /

	<ul style="list-style-type: none"> • supports microgen fuel poverty pilot • continued work is needed to support those unable to make changes to the insulation or heating systems themselves • EEC will be better targeted to work better with other fuel poverty & energy efficient programmes in Scotland • attention should be paid to market transformation of microgen instead of the current pilot as this would help more people in fuel poverty living in hard to heat hard to insulate properties • support use of microgen to combat fuel poverty • successful technologies should be swiftly incorporated into a nationwide installation programme • energy efficient in social rented sector is one area the Scottish Executive could have the biggest impact in tackling fuel poverty • eligibility of all fuel poverty schemes should be widened to include other fuel poor groups currently missing out • merging of private sector housing grant into the scheme of assistance would be a means of targeting help for poorer homeowners to improve the energy efficiency of their homes 	<p>Association for the Conservation of Energy</p> <ul style="list-style-type: none"> • Chartered Institute of Housing • The Royal Environmental Health Institute of Scotland
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9.2 Warm Deal & EEC/CERT

No.	Comments	Names
8	<ul style="list-style-type: none"> • eligibility should be extended to include other groups not currently eligible such as disabled persons, chronically sick, low income families and single people on very low incomes • EEC funding gives homeowners attractive prices compared to average cost of installation • existing Scottish Executive budgets & EEC funding should be brought together to work in a more coordinated manner • in this way, all properties suitable for both cavity wall & loft insulation could be insulated • warm deal would be better targeted at private landlords who's tenants are in fuel poverty as 	<ul style="list-style-type: none"> • Energy Action Scotland • Wise Group • South Ayrshire Council • Aberdeen City Council • Scottish Gas • Fife Council • Scottish Renewables

	<p>there is overlap with EEC</p> <ul style="list-style-type: none"> • future policy mechanisms should embrace CERT & encourage funding integration • EEC monies would be better directed at Warm Deal • EEC should apply to renewable heat in Scotland • product set covered by EEC should be extended • urge the Scottish Executive to ensure its receiving fair share of EEC funding i.e. more than 9% and suggest this is raised with Defra 	<ul style="list-style-type: none"> • Friends of Earth / Association for the Conservation of Energy
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9.3 Energy efficiency measures & housing

No.	Comments	Names
15	<ul style="list-style-type: none"> • housing sector can make a huge contribution to low carbon economy • private sector housing has proved more difficult to educate on the benefits of energy efficiency • revolving loan schemes for homeowners topped up with a bit of grant could help • loan & grant scheme should be for energy efficiency such as boilers & insulation • setting targets to improve energy efficiency in housing does not translate into corresponding carbon savings • incentives need to be provided to those houses which are not cost effective to insulate using standard methods • housing previously thought to be unsuitable for insulation should be re-examined • further research into insulation methods for timber frame walls & other types of roofs is urgently required • more financial assistance for homeowners to retrofit existing buildings • strategy is an important first step in improving energy efficiency of housing stock • householders need incentives such as discount on council tax • barrier to take up is in 'able to pay' group • need challenging targets for all housing and mechanisms enabling these targets to be met 	<ul style="list-style-type: none"> • Wise Group • South Ayrshire Council • West Lothian Council • Aberdeen Campaign Against Climate Change • South Ayrshire Energy Agency • Aberdeen City Council • Scottish Renewables • National Insulation Association • Fife Council • The Scottish Rural & Property Business Association • Friends of Earth/Association

	<ul style="list-style-type: none"> • amended tolerable standard rating and Scottish Housing Quality Standard National Home Energy Rating for the next 15 years • minimum National Home Energy Rating of 7 for Scottish housing stock • legal reforms needed to meet these targets especially to enable improvements in tenements and private rented sector • low interest loan scheme to householders • developers & suppliers should be encouraged to aspire to higher standards of energy efficiency • good practice forum with developers, architects & housing providers should be developed across the United Kingdom • future energy policies to be more closely aligned with energy efficiency, rather than microgen • energy efficiency standards should be introduced to private rented sector • energy efficiency & microgen should be included on all new development sites • Landlords Energy Saving Allowance is not well enough marketed to tenants • welcome review of Home Energy Conservation Association targets • new Home Energy Conservation Association targets should be set for all Local Authorities: 30% reduction of carbon emissions based on March 2007 levels by March 2017 	<p>for the Conservation of Energy</p> <ul style="list-style-type: none"> • Chartered Institute of Housing • City of Edinburgh Council • Energy Saving Trust • Energy Action Scotland
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10. Public Sector

10.1 Central Energy Efficiency Fund

No.	Comments	Names
13	<ul style="list-style-type: none"> • include targets and reporting mechanisms • additional funds should be invested • simplistic & beneficial • projected savings of 20% over 5 years is unrealistic • supports £4 million investment for the HE/FE sector 	<ul style="list-style-type: none"> • SEON • North Lanarkshire Council • Energy Action Scotland • Wise Group • South Energy Agency

	<ul style="list-style-type: none"> • should be enhanced by resources and training on energy efficiency & microgen to raise awareness of these measures to staff & students • 5 year payback should be increased if it's going to support microgen • Central Energy Efficiency Fund has identified about £200k savings per annum • streamline existing application process • welcomes changes to Central Energy Efficiency Fund that include Advanced Meter Readers (AMRs) • should be extended to across entire public sector • should include microgen, waste minimisation & renewable energy 	<ul style="list-style-type: none"> • SDE • Changeworks • Aberdeen City Council • Scottish Renewables • Fife Council • Friends of Earth / Association for the Conservation of Energy • Scottish Water • SEPA
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10.2 Procurement

No.	Comments	Names
11	<ul style="list-style-type: none"> • greater care must be taken in how better energy procurement is achieved • discussion is needed following the McLelland Report with Energy Managers for technical input • require high levels of energy efficiency in building design & operation • used to cascade carbon reduction to Scottish Executive suppliers • insist on set % of microgen in all new public buildings • welcome further guidance on how procurement can contribute to energy efficiency • to procure energy through collaborations, there is a need for accurate consumption data • council energy officers should be involved in the energy procurement process • need targets for purchase of renewable supplies • needs to consider whole of life costs to measure value for money • must act to eliminate energy inefficient products 	<ul style="list-style-type: none"> • SEON • North Lanarkshire Council • Wise Group • West Lothian Council • SHON • South Ayrshire Energy Agency • Changeworks • Scottish Renewables • Fife Council • Friends of Earth / Association for the Conservation of Energy

		<ul style="list-style-type: none"> • Scottish Water
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10.3 Eco Schools

No.	Comments	Names
9	<ul style="list-style-type: none"> • student involvement in energy saving measures including building design and operation of heating & lighting in schools is welcomed • schools should be 'buildings that teach' about energy efficiency & microgen • should be embedded in curriculum • every school should be encouraged to register with Eco Schools • needs to focus more on energy use • all new schools should be carbon zero in use by 2009 • by 2011 at least half of schools should be retro-fitted to improve their energy efficiency • all schools should be registered by 2011 • introduction of the 'carbon footprint' into the programme would be a realistic application of an educational tool • more focussed education & awareness programmes aligned with Eco Schools is a way of delivering long term behavioural change 	<ul style="list-style-type: none"> • Wise Group • Forward Scotland • SDE • Scottish Renewables • Fife Council • Friends of Earth / Association for the Conservation of Energy • SHON • West Lothian Council • Energy Saving Trust

10.4 Public Private Partnerships

No.	Comments	Names
6	<ul style="list-style-type: none"> • do not encourage delivery of sustainable public buildings • hope failure to ensure renewables in Public Private Partnerships programme for schools will not be repeated • contractors often do not want to take on liability for energy efficiency & microgen technologies • problem of installing microgen on Public Private Partnerships schools should be resolved • worked against microgen due to cost and maintenance issues 	<ul style="list-style-type: none"> • South Ayrshire Council • Forward Scotland • Changeworks • Friends of Earth / Association for the Conservation of Energy

	<ul style="list-style-type: none"> • should stipulate minimum energy efficiency standards for Public Private Partnerships contractors before releasing funds • should set funding conditions for Public Private Partnerships projects which include sustainability elements 	<ul style="list-style-type: none"> • SEPA • City of Edinburgh Council
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10.5 Leading by example

No.	Comments	Names
10	<ul style="list-style-type: none"> • setting an example for a transition to a lower carbon footprint • Non Department Public Bodies and agencies should be seen as exemplars of sustainable building design, refurbishment & modernisation • encourage staff to play their role in reducing carbon emissions • supports an ambitious reduction in carbon emissions from the Scottish Executive's own activities and estate • encouragement of greater uptake of energy efficiency & microgen across public sector estate especially schools & NHS trusts • targeting key cities to become 'low carbon cities' would become a focal point for action • climate change declaration has not yet had an impact on the majority of public sector decision making or on the attitudes & behaviours of public sector employees • local government has no mandate for action on climate change • not prioritised and it can be difficult to justify resources to deliver action • emissions should be reduced by 5% per annum at least • reduce transport based emissions • grant funding is too time consuming & uncertain 	<ul style="list-style-type: none"> • Dormont Estate • Wise Group • South Ayrshire Energy Agency • Forward Scotland • Scottish Renewables • Energy Saving Trust • Fife Council • Friends of Earth / Association for the Conservation of Energy • SEPA • Changeworks

10.6 Targets & benchmarking

No.	Comments	Names
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8	<ul style="list-style-type: none"> • welcome commitment to work with Local Authorities to develop other ways to monitor, report & benchmark emissions • inadequately explains the intention to set targets for carbon dioxide emissions, what these are and how they could be delivered • Scottish Executive needs to consult with Local Authorities to set implication of performance measures and how they should respond • targets for all public bodies should be the same • should be a reduction in carbon emissions instead of reduction in energy use • monitor & report against benchmarks as this would help to re-prioritise spending • need other targets i.e. emissions, generating renewable energy. • stronger incentives are required if Local Authorities can support government targets • target for carbon dioxide emissions reduction should be applied to Non Department Public Bodies & Local Authorities also • setting environmental performance targets for Non Department Public Bodies and agencies and targets for Local Authorities 	<ul style="list-style-type: none"> • North Lanarkshire Council • SEON • West Lothian Council • SHON • Aberdeen City Council • Fife Council • Friends of Earth / Association for the Conservation of Energy • Scottish Water
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10.7 Carbon management

No.	Comments	Names
3	<ul style="list-style-type: none"> • very positive initiative • expected to greatly assist in delivering commitments under Scottish Climate Change Declaration • all Local Authorities should participate in carbon management • lacks surety of action plans being implemented as competition for resources undermines commitment 	<ul style="list-style-type: none"> • South Ayrshire Council • Aberdeen City Council • Fife Council

11. Microgeneration

11.1 Targets

No.	Comments	Names
10	<ul style="list-style-type: none"> • should differentiate across range of technologies • quantify anticipated carbon savings • significant investment & commitment by the microgen industry is required if the technologies are to make a contribution to the 40% renewables by 2020 target • cascade down to building standards & planning • supported by complete, holistic & robust policies to welcome investors to the Scottish market • assess current targets and whether or not more needs to be done • required to ensure emissions reductions from microgen are realised • welcome targets for microgen • welcome targets for renewable heat • targets could be for zero carbon buildings • projecting energy demand would help set targets for renewables now • do not agree with Scottish Executive target for microgen: should only set & enforce carbon emissions reductions and give consumers flexibility in how they achieve them 	<ul style="list-style-type: none"> • Scottish Natural Heritage • South Ayrshire Energy Agency • West Lothian Council • Scottish Renewables • SEPA • Highlands & Islands Enterprise • Aberdeen City Council • Fife Council • Friends of Earth / Association for the Conservation of Energy • EDF Energy

11.2 Barriers to uptake

No.	Comments	Names
17	<ul style="list-style-type: none"> • planning system should make it easier for householders to install microgen • costs and benefits of specific technologies should be properly treated in the market place • attractiveness to potential buyers will depend on: future gas prices; effectiveness of large scale public installations; payback times; environmental issues; simplification of regulatory 	<ul style="list-style-type: none"> • Institute of Engineering & Technology • Royal Institute of Chartered Surveyors

	<p>arrangements and transparent regime of rewards for export of electricity</p> <ul style="list-style-type: none"> • application process for microgen should be simplified whether that be for planning permission, grid connection or grant • planning requirements associated with microgen must be linked to the effectiveness of the technology • technologies are too expensive and promised benefits are unproven • GDPO should be a relaxed code for microgen • need to consider onsite generation of renewable energy at the design stage • planning reform could make it easier to install microgen • planning restrictions & network access are barriers • improve the grid infrastructure to allow suppliers access to the market • power distribution system in some areas of Scotland is weak • ensure that a potential skills shortage does not cause an additional barrier • definition of microgen should not determine whether or not it needs planning permission • Scotland-wide policy on what requires permission 	<ul style="list-style-type: none"> • Dormont Estate • West Lothian Council • SHON • South Ayrshire Energy Agency • Forward Scotland • SDE • Scottish Renewables • Scottish Gas • Scottish Water • Kilmartin Property Group • City of Edinburgh Council • Scottish Natural Heritage • Energy Saving Trust • Fife Council • Friends of Earth / Association for the Conservation of Energy
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11.3 Support & incentives

No.	Comments	Names
21	<ul style="list-style-type: none"> • give the certainty to the manufacturers, developers & financial institutions • energy efficiency measures should be prioritised • reduce emissions from non-renewables sources by carbon capture or nuclear • compulsion on new build and public procurement to help bring down costs • provide a resource of information to businesses supplying demand for microgen devices for 	<ul style="list-style-type: none"> • Fife Council • Wise Group • Scottish Natural Heritage • South Ayrshire Energy Agency

	<p>installers & manufacturers to engage with each other and promote best practice</p> <ul style="list-style-type: none"> • planners should be provided with sufficient training • need fiscal incentives • increased financial support and information • welcome extension of permitted development rights for microgen to households & commercial buildings • 15% target in SPP6 will assist market growth • should commission a wider study into other techs such as community scale or micro-CHP • nationwide base information of what areas are suitable for what type of microgen is highly desirable • ongoing provision of grant funding or tax breaks • UK microgen certification process is welcomed • there is an opportunity for current supply network to be replaced with a microgen friendly network • greater emphasis for uptake of microgen should be focussed on encouraging new business opportunities that this developing industry could bring to Scotland • financial incentives for domestic microgen need to be optimised • grant should be raised to 40% • further £2 million should be invested in support for grants • council tax rebates for those installing microgen • continued support for The Low Carbon Building Programme & The Scottish Community and Householder Renewables Initiative or the market may decline • access to sound advice, design and installation of each system • competent and trained installer / technician base is needed • simple financial support to build up the market • sustained support for research & development 	<ul style="list-style-type: none"> • Forward Scotland • SDE • Scottish Renewables • Scottish Gas • The Scottish Rural Property & Business Association • Friends of Earth/Association for the Conservation of Energy • The Royal Environmental Health Institute of Scotland • EDF Energy • Kilmartin Property Group • City of Edinburgh Council • Scottish Enterprise • SEPA • Dormont Estate • Aberdeen City Council • Institute of Engineering & Technology • Scottish Retail Consortium • Energy Saving Trust
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	<ul style="list-style-type: none"> • need more in-depth advice & support • business rates exemptions should be extended to include microgen • benchmarking to measure energy use reduction against microgen installation • proposal to establish a high level work group for microgen policy • current level of grant support for microgen is inadequate • best practice from European countries on their use, programmes, incentives & promotion 	
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11.4 Impacts

No.	Comments	Names
5	<ul style="list-style-type: none"> • fossil fuel microgen technologies such as Combined Heat and Power will not always deliver lower carbon emissions when compared to electricity from conventional power stations and heat from condensing boilers • impacts on human health and local air quality appear to have been overlooked • concern about the promotion of biomass especially for areas where Local Air Quality Management Areas have been declared • developments in schools & housing developments should take into account that children are a vulnerable group in health terms • Poly Aromatic Hydrocarbons (PAHs) are toxic, persistent in the environment and bioaccumulate in fatty tissues & biomagnify through the food chain. Wood burning is one of the major sources of PAHs • need associated safeguards for the historic & natural environment • larger scale of microgen could have an impact on natural heritage especially for bats, freshwater ecology and areas near to sensitive bird populations 	<ul style="list-style-type: none"> • The Royal Environmental Health Institute of Scotland • EDF Energy • City of Edinburgh Council • SEPA • Scottish Natural Heritage

12. Action Plan

No.	Comments	Names
10	<ul style="list-style-type: none"> • should be placed in the context of action on climate change • Scottish Government should lead on energy & climate change with this action plan • should take a pro-active approach • robust statistical breakdown so its impact and carbon reduction contribution can be better understood • give government direction & confidence and avoid duplication in effort • proposals need to be strengthened given the scale of the problem • encourage innovation and drive next steps • not ambitious enough • supported by a systematic business plan approach • welcome further measures for business sector • focus on encouraging & supporting companies to get involved in the supply chains growing around microgen technologies • support the development & commercialisation of indigenous technologies 	<ul style="list-style-type: none"> • Highlands & Islands Enterprise • West Lothian Council • SHON • ACACC • South Ayrshire Energy Agency • Changeworks • Scottish Renewables • National Insulation Association • The Scottish Rural Property & Business Sector • Scottish Enterprise

13. General Comments

No.	Comments	Names
10	<ul style="list-style-type: none"> • recommend that a higher spend per capita on energy efficiency in Scotland than in the rest of the UK due to anomaly in energy use • suppliers should be able to claim credits for reductions in individual household consumption 	<ul style="list-style-type: none"> • Energy Action Scotland • Scottish Gas • Energy Saving Trust

	<p>and for advice given i.e. energy audits</p> <ul style="list-style-type: none"> • householders should be encouraged to invest in energy efficiency measures first • concern over achieving aims set out • reducing demand for energy is given appropriate priority over the installation of micro-renewable technologies • energy efficiency should always be the first step before considering installation of microgen • focus of the Strategy should be more energy efficiency then looking at local energy supply, including microgen • energy source is the principal issue. • microgen is far more effective when installed on a building which has effective insulation • should ensure any property fitted with microgen technology is suitably insulated. • strategy does not cover new ground 	<ul style="list-style-type: none"> • Alan Kennedy • The Institute of Engineering & Technology • Wise Group • West Lothian Council • Changeworks • National Insulation Association • Fife Council
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ANNEX 2 – List of Respondents By Categories

Individual

Alan Kennedy

Local Authority

Aberdeen City Council

City of Edinburgh Council

Fife Council

North Lanarkshire Council

Scottish Energy Officers Network

Scottish HECA Officers Network

South Ayrshire Council

West Lothian Council

National Agency / Organisation – Business & Industry

Business Environment Partnership

Chartered Institute of Housing

Highlands & Islands Enterprise

Royal Institute of Chartered Surveyors

Scottish Enterprise

Scottish Renewables

Scottish Retail Consortium

Scottish Water

The Institute of Engineering & Technology

The Royal Environmental Health Institute of Scotland

The Wise Group

National Agency / Organisation – Individuals & Communities

Changeworks

Energy Action Scotland

Energy Saving Trust

Forward Scotland

Highlands & Islands Community Energy Company

Scottish Rural Property & Business Association Ltd

South Ayrshire Energy Agency

Sustainable Development Education Policy Network

National Agency / Organisation – Environment

Scottish Environment Protection Agency

Scottish Natural Heritage

Environmental Group

Aberdeen Campaign Against Climate Change

Friends of the Earth & Association for the Conservation of Energy

Energy Business

EDF Energy

National Insulation Association

OFTEC

Scottish Gas

Other

Dormont Estate

Kilmartin Property Group

