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Dear Sir,

I am grateful for the opportunity to respond to this consultation. My response is critical in nature not because I disagree with the aims of the bill but because I feel that a great deal more could already be being achieved within existing provisions of government. In other words yet another bill isnt the whole answer. Ultimately it isnt words but action that will count and, sadly, there currently isnt much sign of joined-up thinking from government as regards to action on the environment and delivery of best value.

None of us are guilt free when it comes to energy use and waste and I can put my hand up too, despite the fact that this enterprise, on balance fixes many times more carbon than it releases. We are acting to reduce the consumption of fossil fuels.

Yours faithfully
Andrew Bradford

Proposed Scottish Climate Change Bill

The document needs to sell more effectively the requirement for the bill. While I accept the need for action for climate change the vast majority of the public are going to resist measures the moment those measure impact upon their lives.

Therefore there needs to be greater emphasis on two aspects:

- Irrespective of whether global warming is anthropogenic or not it is common sense to make best use of our natural resources. At present we, the world, is on track to blow the whole of the hydrocarbon reserve in little over 200 years much of it frittered away in utterly wasteful activities some examples are:
 - Heating homes that could be designed not to require heating
 - Using lorries/trucks and planes to transport goods which could be shifted far more sustainably by rail or sea
 - Cheap holiday air travel e.g. jetting off for the weekend just because one can
 - Fuelling Patio Heaters to heat the outside while trivial in the whole scheme of things the use of fossil fuels to heat the outside as an alternative to putting on sensible clothing or encouraging people to eat / drink inside neatly sums up current attitudes towards the environment. This sort of obscene waste of energy should have been stamped on years ago.

- Allowing new power stations to be built without making them use the heat produced to replace current fossil fuel consumption for heating buildings.
- The need to put our house in order before expecting others to take action.

Failure to think in the long term and failure to address the difficult (unpopular) issues.

The second major weakness is that politicians fail to think in the long-term. This is a result of the democratic process their future jobs depend on getting re-elected and so unpopular measures and subjects are avoided.

Example:

Population: Even if personal consumption remained static, global consumption would grow due to the rapid growth in world population. If personal consumption grows, as it is globally, and there is a growing population then consumption grows as a multiple of those factors.

In Scotland we have a demographic crisis with an ageing population. The way in which we have structured our social support systems, NIC, pensions etc. means that the current working population must support the retired, weak, young etc. Therefore the perceived wisdom is that the solution is to have more young workers through migration or by giving incentives for children.

In the long term it is patently unsustainable if society can only function by having a larger working population to support the others. Clearly something needs to be done to address the whole problem of population growth and to devise a system that can cope perfectly comfortably with a declining population. Indeed a declining population should be seen as the goal it would lead to:

- Reduced consumption
- Reduced congestion
- Reduced demand for housing, roads & services
- More space for the individuals
- Improved chances for society to flourish

To achieve this requires fundamental changes in the way in which we manage, for example, national pension schemes.

Until governments address these really vital concepts then the aspirations of much of this bill will be very much harder to meet.

Funding for Community Renewables and Microgeneration:

The regulations surrounding these schemes needs to be loosened to encourage those who think outside the box.

Example: Where a private landlord is delivering affordable housing, SCHRI community funding isnt available to deliver a local district heating scheme that would give tenants cheaper heating. So the scheme isnt viable and they must make do with expensive and polluting electric heating. They lose and the environment loses through lack of flexibility of support scheme.

3.4 The capacity of Forest to lock up carbon:

The capacity of a forest to lock up carbon is finite even if the forest is retained as a non-productive forest eventually the CO₂ is released through the decay of trees etc. However I would maintain that forests should be managed as productive units and the timber can be used, e.g. to build houses and therefore the CO₂ remains locked up in the timber until that use ends it may be centuries later. Either way the forest has a limited capacity to lock up CO₂.

When looking at Forests the paper ought to put more stress on the capacity of forestry to provide biomass for use as fuel to generate heat and power. This biomass should be used close to where it is grown to heat (and power) rural communities. In these communities, which are generally outwith the gas main system, heating is mostly currently provided by oil, coal or LPG which has to be brought in by lorry. See attached paper 1

4.23 **The ability of government to deliver a planned and coordinated adaptation response** will minimise the negative impacts and highlight potential opportunities of a changing climate

Despite glaring failures in present systems within society having been pointed out for years government consistently fails to deliver joined up thinking. What realistic expectation can there be that this bill is going to be the one that changes all that? The point is that much action could be taken now, it doesnt need a new bill to precipitate action.

Example: Why are we moving low-grade small roundwood out of rural areas where it is grown, to chipboard factories many tens of miles away at a cost to society (road repairs, pollution, accidents, congestion etc) that is up to 5 times as much as the net return to the grower when at the same time other lorries are trucking in fossil fuels (mostly oil but also LPG and coal) to heat houses close to the forest in which that timber is grown?

If that timber was used to heat and power whole communities then society would gain from not having to bear the social cost of that lorry traffic and save further by eliminating the lorries bringing in the hydrocarbons to heat the communities that have this biomass on their doorsteps. Joined up thinking would use the public money saved on road maintenance as a catalyst to invest in district heating schemes to use that timber close to point of growth. See attached paper 1

4.36 Progress has been made in reducing emissions.

This progress is probably not as good as it seems. It has largely been achieved by:

- a) the switch from coal to gas as fuel for generating electricity
- b) exporting carbon emissions to countries such as China and India.

4.46 Let us have the truth about the Kyoto Protocol

The actual performance figures of signatories and non-signatories to the Kyoto Protocol should be published. I understand that most signatory countries have increased their emissions from the 1990 level rather than reduced them. Many have increased emissions more than the USA which isnt a signatory.

The international community has already begun a coordinated response to the challenge. In truth the international community has done little than coordinate a talking shop. Action on the ground is very limited and has, at best, slowed emissions growth globally from what it might have been. There is no chance of most countries meeting their 2012 targets.

4.58 Refurbishment of an existing structure uses less material and produces lower greenhouse gas emissions than creating a structure from scratch.

I am not convinced by this whole life energy use should be considered. The cost of heating an old refurbished house may still be far greater than that required to heat a new energy

efficient building and thus, over the lifetime of the building, the new one may prove a better bet.

5.49 International aviation and shipping

The Green Papers comment on this vital subject is a cop-out.

- Emissions from aircraft are much more damaging than emissions of the same material at ground level.
- The biggest growth sector in air travel is in the leisure / tourism market i.e. it is non-essential to travel and the growth has been stimulated by the arrival of low-cost air travel. Now people jet off to Venice for the weekend, just because they can. If it were more expensive to fly abroad the majority of the leisure travellers would elect to stay closer to home for their vacation or weekend break.
- Low-cost air travel creates an economic deficit i.e. it exports more domestic expenditure abroad than it brings in expenditure from abroad.

Example: for the UK: Foreign visitors arriving by air spent nearly 11 billion in the UK in 2004, but UK residents flying out spent 26 billion abroad a loss to the UK economy of 15 billion pounds. What are the figures for Scotland?

Addressing the issue of low-cost air travel would:

- Be unpopular which is why no politician dares tackle the subject
- Bring economic benefits back to the country by stopping exporting domestic expenditure
- Save on planned airport expansion
- Benefit the atmosphere by reducing very damaging emissions

It is a no-brainer but you can bet that nobody dares tackle the subject.

Omission:

I see no mention of the motor car / public transport issue. Is this too trivial?

The opportunity exists to use a combination of road pricing, IT systems and the public's own motor vehicles to deliver a radical new and efficient transport system for areas where conventional mass public transport systems are not the flexible, efficient solution. Essentially this could utilise the vast number of empty seats that ebb and flow across the country in private cars. IT systems could be used to inform drivers and passengers as to potential supply and demand of lifts and record usage so as to aid security. Drivers giving lifts could receive discount on e.g. road fund licence, per lift given.

An outline of the concept, which requires further development, is attached in paper 2.

8.8 Combined heat and power

Scotland has made significant progress towards meeting our ambitious targets of 31% of electricity generated in Scotland coming from renewable sources by 2011 and 50% by 2020. This makes a key contribution in the move to a low carbon energy supply. We also recognise that how we use energy to heat our homes and businesses will have to change as part of that shift. We are already seeing the development of renewable heat sources such as biomass, and the microgeneration of heat. There is also potential to target waste heat from large scale energy generation or industrial processes through Combined Heat and Power and district heating schemes, as happens in other parts of the EU. The Scottish Government will consider how reduction of the carbon emissions associated with the generation of heat might contribute to our climate change targets, and whether measures might be necessary in the Bill.

There is too much self-congratulation in this paragraph.

The fact that Hydro Plants were built half a century ago has given us a head start. We shouldn't knock it but we can hardly take the credit for the decisions that resulted in those plants. Instead we should look at more recent actions by government to see if they are so laudable.

Example: Recently the Scottish Government has seen the start-up of a biomass electric power station at Lockerbie. Where does all the heat go from that process? I understand it is vented to the atmosphere, it isn't used, as it should be, as a source of heat for buildings. Why in 2007 are we still not thinking in a joined-up fashion? While I'm aware that this is a private sector project and one driven by the availability of ROCs etc. the Scottish Government must understand that it is in this sort of area where it has the opportunity to make a real difference.

Question 1: What is the cost to the Scottish Government in Sensitive Lorry Miles of the timber carried to this power station? See <http://www.dft-eb-calculator.co.uk/>

There is every likelihood that it is the taxpayer that ultimately is having to fund increases in road maintenance, congestion, pollution, accidents etc. that results from the increase in lorry traffic to this site.

Question 2: Why isn't it made a requirement of new heat generating processes such as this to replace heat currently produced by the combustion of fossil fuels?

The paragraph refers to the *potential to target waste heat from large scale energy generation or industrial*

processes through Combined Heat and Power and district heating schemes, as happens in other parts of the EU. But sadly it hasn't shown much initiative so far in this direction. No new bill is required to achieve this surely planning conditions could be applied.

Annex:

Paper 1:

BIOMASS, CARBON FOOTPRINTS AND ROAD HAULAGE - An appeal for some joined-up thinking. Bradford, A. 2007

file: Road Transport Costs 2007

Paper 2:

TRANSPORT AN ALTERNATIVE PUBLIC TRANSPORT CONCEPT. Bradford, A, 1999 (modified since).

file: transport