



CONSERVE AND SAVE – A CONSULTATION ON THE ENERGY EFFICIENCY ACTION PLAN FOR SCOTLAND

Consultation response from the Sustainable Scotland Network

1. Introduction

The Sustainable Scotland Network (SSN) exists to support local authorities working together for a sustainable Scotland. SSN's members are the sustainable development officers and advocates from Scotland's 32 local authorities. The network provides Scottish local authorities with an effective support and improvement service on sustainable development. SSN is supported by the Scottish Government.

SSN's programme priorities are Best Value and Sustainable Development, Procurement for Sustainability, the Local Footprints and Climate Change. SSN takes a 'one-programme approach' to these themes, ensuring that each reinforces the other and all contribute to the improved sustainability performance of Scottish local authorities.

The work of SSN is guided by a Steering Group, with members drawn from Scottish local authorities. SSN is a programme of Keep Scotland Beautiful. Keep Scotland Beautiful is an operating name of Environmental Campaigns (Scotland), a registered Scottish Charity (Scottish Charity Number SC030332).

2. Developing This Response

This consultation response has been informed by a consultation event organised by SSN, in partnership with the Scottish HECA Officers Network (SHON) and the Scottish Energy Officers Network (SEON), which took place on 10th December 2009 in Glasgow. The consultation event was attended by approximately 50 delegates from 20 local authorities. Delegates were members of SSN, SHON or SEON, thereby reflecting a broad mix of sustainable development officers, energy officers and HECA/housing officers from local government.

The 10th December consultation event mainly focused on Chapter 4, Chapter 7, Chapter 9 and Chapter 11 of the consultation paper. Discussions did however also touch on other parts of the consultation paper, notably Chapter 5 on Changing Attitudes and Behaviours. In section 5 below, this consultation response provides a summary of key points, followed by the more detailed notes of the 10th December discussion, provided in italics.

3. General Comments

Across SSN's work we promote an approach which seeks to make progress across a range of key success criteria. These are seen as vital to the success of local authority work on sustainable development, climate change and related areas of actions. SSN considers the following factors to be critical in progressing the Scottish Government's energy efficiency plans:

- Leadership – by politicians, managers and officers.
- Legislation – linking policies clearly with legislation and making action mandatory
- Culture Change – supporting training, awareness raising and behaviour change
- Programmes of Support – providing coordinated, effective and well-resourced programmes to drive forward specific actions.
- Scrutiny / Accountability – improving and enhancing internal and external scrutiny and accountability, notably through audit and reporting mechanisms.
- Resources – making better use of existing resources, ensuring investments address outcomes, and allocating adequate resources to implement action plans.

The outcome of the Energy Efficiency Action Plan (EEAP) consultation should promote good practice across all six of these areas, promoting well-informed and coordinated leadership, legislative drivers, training/awareness raising/behaviour change actions, programmes for energy efficiency and carbon emission reduction, effective audit and reporting procedures, and the allocation of resources to achieve a 'step change' in energy efficiency in Scotland.

4. The EEAP Strategic Context

SSN welcomes the comprehensive nature of the EEAP. The strategic context set out in the EEAP is extremely useful, making links as it does to climate change/carbon emissions reduction, peak oil, energy security, fuel poverty and sustainable economic growth. This context reflects the strategic linkages that SSN would seek to make when promoting the value of energy efficiency. However, the final EEAP needs to provide clarity on efficient and effective interventions, as well as a clear route-map for policy development, financial investment and practical implementation of the agreed actions. From the broad analysis and scope of the consultation paper there must come a focused, coordinated, timetabled and adequately resourced action plan that will achieved the step-change in improved energy efficiency and carbon emissions reduction that is needed across all of Scotland.

In particular, SSN would encourage further work by the Scottish Government to address the challenges presented by the rebound effect and economic growth. SSN's work on carbon emissions reduction has highlighted the importance of addressing and dealing with the rebound effect, if policies, actions and investments are to be successful. In addition, our recent work looking at sustainable economic growth points to the challenges of achieving a reduction in energy consumption and emissions, while also achieving economic growth. The work of Professor Tim Jackson and his work on 'Prosperity Without Growth' highlights that economic growth can present serious dilemmas for achieving sustainability, energy saving and emissions reduction; the more growth, the more emissions reduction (and energy efficiency) is required to meet targets.

5. Response to Consultation Chapters and Questions

Chapter 4: Energy Efficiency Targets and Issues around Data Monitoring

SSN would highlight the following factors as critical for an effective EEAP:

- The 'ultimate target' of the EEAP should be reducing overall energy consumption, with clear linkage to the carbon reduction targets of the Climate Change (Scotland) Act. However, the importance of issues such as tackling fuel poverty and promoting health and well-being needs to be taken into account when developing and implementing the EEAP.
- The EEAP should include sub-sector targets for homes, non-domestic buildings, public sector bodies, transport etc. Some of these sub-targets may need to be pure energy efficiency or energy saving targets. However, these should all be informed by the overall objective and target of reducing carbon emissions from overall energy consumption.
- The quality, accessibility and robustness of data must be improved as a priority. This is needed to inform target setting and the monitoring of progress. However, early actions and targets could easily be informed by best available existing data, so that concerns about data don't become an unnecessary break on taking 'quick win' actions.
- The EEAP should be informed, as much as possible, by good quality 'marginal abatement cost-curve', 'whole life costing' and 'life-cycle analysis' assessments. The cost of carbon should also be included when assessing the effectiveness of interventions, as well as wider benefits such as health benefits.
- Reporting on overall energy consumption and CO₂e emissions and energy saving policy interventions/actions should be improved and made increasingly mandatory. This includes energy reporting by the public sector. Clarity is also needed on the accountability for each aspect of the EEAP, and clarity on what local authorities are accountable for.

- Scotland should establish very ambitious energy efficiency targets, as these are largely seen as technically feasible. Very ambitious energy efficiency targets would be justified in order to meet Scotland's world-leading CO2e emissions reduction targets.
- Energy efficiency must be made a mandatory consideration across all parts of the public sector and local government responsibilities. This needs to be backed up with investment in skills, data management, policy analysis and public engagement. Local government and the Scottish Government should work together to identify cost-effective and adequately funded approaches to energy efficiency action.

Chapter 4 Notes from the 10th December Consultation Event

Question 1 – Should Scotland's energy efficiency target be based, as discussed, on energy savings achieved or total consumption? Or are there alternative ways in which a target should be set and monitored? If so, what would be the benefits of such an approach?

- Carbon consumption was seen as the 'ultimate target' by one group, though the other two groups were more inclined to accept that an Energy Efficiency Action Plan needed to have specific energy efficiency targets
- Consensus from all three groups was that there had to be specified 'sub-sets' contributing to the energy efficiency target. Each sub-set would have individual drivers e.g. local authorities already have various strategic plans – Fuel Poverty, Energy Efficiency, etc. Clarity required re what each sub-set comprises and how they contribute to the big picture. Annual targets, in line with the Government's Climate Change Act requirements were considered appropriate by one group
- Consumption information at every level – sectoral, geographic - from utilities was generally agreed to be crucial, with regulatory input if necessary. In addition to this, information re 'useful' consumption, export and generation (waste, transmission losses, etc), would be needed. Data from private companies (oil, gas) would have to be incorporated
- Regulation of the un-regulated fuel markets should be established – oil, LPG, biomass
- Reporting would have to be mandatory, but would have to include all contributory elements.
- Where appropriate, local authorities have to have robust monitoring data for CRC – general feeling was that reporting for EEAP targets should be in a similar format

Q 2 – What should be the basis for the energy efficiency target? For example, should any 'energy savings achieved' target take into account UK ambition and programmes? If so, how ambitious should Scotland be in its energy efficiency targets compared to the UK?

- UK targets are based on energy saved, not energy consumed – Scotland's target has to be the latter. Scotland's targets shouldn't be about comparison with UK
- Conflicting views re whether Scotland should go for higher targets because of the climate differences north of the border, or whether the target should be lower for the same reasons (it should also be noted that savings from measures would also be higher in Scotland because of higher energy use)! Funding constraints aside, the target should aim high and reflect innovation in terms of both measures and ambition
- General agreement from two groups that there is a specific role for Procurement Scotland – everything from implementation of the Energy-Using Products Directive to ESCO!
- Strong belief from one group that programmes should be established after the target and made to measure, not forced to fit from the current delivery frameworks

Q 3 – What approach do you consider we should take to setting out how different sectors will contribute to our target? What further evidence should be collected and assessed?

- Viewed as important that measurement is accurate – current issues, for example, relating to the fact that domestic insulation measures are assumed to save specific lifetime amounts of carbon but despite significant investment, no significant corresponding savings have been proved. Also smart metering debate – compulsory, but will it generate significant savings (note – agreed that

this would not happen without a supporting national programme of education and awareness-raising)

- *Contributory elements included loan schemes, PAYS, polluter pays. Incentivise EPCs. Carrot and stick legislation generally favoured!*
- *Suggestion from one group that we could learn more from suppliers – how will they engage/deal with what will, in effect, be a diminishing energy profile*
- *Enabling funding required*
- *Monitoring/measuring/evaluating/reporting – make more use of the contractor network. Possible link with issue of EPCs*

Q 4 – What evidence do you have to suggest that the different levels of savings identified in the broad sectoral indications may or may not be achievable?

- *Technically achievable, though there were obvious resource issues identified. Potential impediments include the skills element, especially as new technologies come on board*
- *Training and industry standards*
- *Large-scale basic thermographic imaging to complement existing data*
- *Planning policy and legislation in Scotland – needs to be brought into line with what's to be achieved in terms of energy efficiency targets*

General discussion and comment included:

- *Skills agenda at every level and in every sector*
- *Need for independent audit/monitoring and reporting*
- *Might be useful to create specific links to local economic development*

CHAPTER 7: MAKING SCOTLAND'S EXISTING HOMES MORE ENERGY EFFICIENT – THE ROLE OF REGULATORY STANDARDS FOR HOUSING.

While useful views were gathered at the 10th December consultation event on many of the detailed questions in the EEAP consultation relating to existing homes, the notes of which are contained below, SSN would like to highlight the following key issues as strategically important:

- The need for a step-change in energy efficiency action and investment in Scotland's existing homes, with an emphasis on whole-house, area-based approaches which overcome the often piece-meal, limited and confusing interventions that currently exist.
- Energy efficiency interventions are commonly the most cost effective carbon cutting actions and therefore they should be given due priority in Scotland's climate change delivery plans. The consultation paper clearly lists the various barriers to action on energy efficiency and the final EEAP must therefore provide clarity on how these barriers will be addressed. Central here will be making advice, funding and practical home improvement more attractive, accessible and easy to implement.
- Local authority land use planning and housing strategies should be made as supportive as possible to enable housing energy efficiency and micro-renewable investments and improvements.
- The EEAP should explicitly acknowledge the important role that local authorities play in promoting energy efficiency, improving the local housing stock, providing advice and support, and ensuring that energy efficiency and micro-renewables are implemented to good standards.
- HECA should not be retained in its current format. However we need to have in place duties for local authorities that recognise their role as strategic housing bodies and their expertise in tackling poor domestic energy efficiency. Local authorities are well placed to enable local action however legislation needs to be there to give 'teeth' to any new duties. Housing energy conservation measures should be taken forward as part of the new Public Sector Climate Change

Duties, under the Climate Change (Scotland) Act, as part of Local Housing Strategies, and within the context of Single Outcome Agreements and Community Planning Partnerships.

Chapter 7 notes from the 10th December Consultation Event

EPC's and the use of the RDSAP Methodology

It was felt by the majority of delegates that the current system of energy assessments for domestic buildings was not well suited to the Scottish built environment.

- *SHQS already requires that properties attain a NHER standard.*
- *The NHER assessment is specific to the Scottish climate. It was felt that the EPC system ignored the importance of climate in the determination of energy use in Scottish homes.*
- *There was a question over the robust nature of the process that produces EPCs in Scotland. While we have a system whereby EPCs are produced by members of "protocol organisations" it was felt that there was no practical consistency between assessors as in Scotland there is no national qualification standard required and that the business of monitoring the on-going performance of individual member assessors was left entirely at the discretion of the protocol organisation.*
- *There was also no clear route to how individual householders could check the validity of EPCs or indeed their accuracy.*
- *Any methodology which relied on the use of a property assessment to enforce action should be flexible enough to allow the use of known data. The current RDSAP methodology was felt to be too restrictive, in particular where local authorities and RSL's have detailed information from project specifications which cannot be used as default data must be used in the RDSAP method.*

The Quality of Scottish Housing

- *It was further felt that we should have a Scottish Housing Standards across all tenures which should at the very least be set at the level of the current SHQS.*
- *A number of respondents also indicate that they would like to see the SHQS level for energy efficiency increased to perhaps a stock average of between NHER 7-8 with a lower ceiling that no single property should be below NHER 5.*
- *The elements that make up the energy efficiency under SHQS should be functional standards rather than prescriptive ones. An example was given that the SHQS required a particular depth of loft insulation rather than a target U-value. This meant that compliance with the SHQS was only possible with the installation of quilted loft insulation. It was felt that if a target U-value was the standards, then this left a degree of choice in how to achieve that standard from the point of view of the landlord. This was of particular concern where occupiers used the loft space as a storage space, and that laminated insulated flooring boards could not be used because they did not meet the depth standard however they did meet the same performance standard. The theme of occupant choice was reflected throughout the sessions with many delegates supporting occupant consultation rather than the imposition of arbitrary standards.*

Making a 'step change' in the potential for improvements it was felt that the business as usual case presented by the consultation document clearly highlighted the fact that we needed a radical shift in the type of initiatives and policies currently in place. It was therefore felt that we had to have robust legislation across all tenures in order to meet the challenging targets set by Government in the 10 years to 2020. We need a clear time table for meeting energy efficiency standards in different sectors in housing which is coupled tightly with the progress to the 2020 target.

Two themes came out over the course of the sessions:

1. Tackle the poor energy efficiency evident in the private rented sector first through legislation. In this way it may then be easier by precedent to push through legislation for the owner occupier sector at a later stage. Whilst the PRS sector was seen as being a small percentage of the housing in Scotland, it was noted by delegates and in the consultation as being the sector with the worst energy efficiency. As the PRS market is a business respondents felt that there should be problem with the idea of setting minimum standards in this sector. Many other sectors providing a public service have standards, the energy supply sector being a prime example of this.

2. *Push for legislation which sets a Scottish Housing Standards across all housing tenures. It was felt that as we had 10 years to make a 42% cut in carbon emission, that we did not now have the luxury of time and bearing in mind the length of time that legislation take to go from concept to implementation, then this further supported the need to bring in strict legislation across all housing in Scotland.*

Owner Occupier Sector

In tackling poor energy efficiency in the owner occupier sector it was felt that the most appropriate time for this to occur was at the change of ownership. However it was also recognised that this would only be a small percentage of this sector annually and in some areas the change of ownership was very slow with some properties being in the same hands for 30-40 years.

There was also some concern voiced over how this would be managed within the existing legal process of a house sale in particular where there could be a transfer of the duty to improve taken on by the new owner. We don't want a process which could end up costing more in legal costs than the actual measures themselves cost to implement.

Bearing in mind that the turnover of stock in the owner occupied sector would not contribute enough to make the 2020 target, we need to look at other ways to engage with home owners with both carrots and sticks to improve the energy efficiency of stock in this sector. Buildings in Multiple Occupation (BIMO) legislation will go some way to capturing some of this sector however we need to find other ways to tackle the stock that is not subject to common improvements e.g. terraced and detached housing.

There were some views expressed that we could look to legislation to encourage and enforce works to common/terraced dwellings. Whilst legally the curtilage of this type of property confers no legal duty to improve or repair on the basis that a neighbouring property is being repaired there is a very clear opportunity when one home in a terrace is being improved the it would be technically possible to extend that improvement option to the same type of property within the same terrace row. Again for this to be practical, it would be necessary to manage many sources of funding on the ground including householder contributions (which may be provided by low or zero interest free loans) and grants from central Government and utility obligations. In essence the funding source should be invisible to the householder. We need a system that makes it very easy for people to engage with.

The Repairing Standard

This standard was considered as a route to enforcement in the PRS. There was some support for this voluntary process to be made mandatory with perhaps a ceiling based upon the number of properties managed. The example was given that if a landlord had less than 5 properties then the system would be voluntary, 5 and above the system would be mandatory. It was felt that for this to be successful, there would need to be a grace period where by PRS landlords could choose to improve their properties or sell on to other PRS agencies or back into the Owner Occupier sector.

The Tenements Act

It was felt that the Tenements Act could be expanded to encourage landlords and owners to work together either voluntarily or by mandate. It was also felt that the Tenements Act could be used to tackle the issue of Buildings in Multiple Occupation (BIMO) by allowing common works to be progressed such as loft and cavity wall insulation to whole buildings where there are multiple tenure issues and also issues regarding access to funding. A level could be set at which improvement works would be mandatory if a certain percentage of occupants of the building wanted it to go ahead. This system would need to be support by access to low or zero interest free loans for those occupiers not in a position to receive grant funding.

Gas and Heat Networks

Access to mains gas was raised as an issue and it was felt that we needed to expand upon the current national strategy of the provision of subsidised connections to the main gas grid on the basis of the top 20% of the Scottish Index of Multiple Deprivation areas and fuel poverty. In addition to this it was felt that the expansion of the national mains gas grid was being favoured over the installation of local and perhaps national heat networks. The same level of subsidy should be extended to the development of local heat

networks which could in theory be themselves connected nationally in the future in the same way that local town gas networks were in the 1960's.

Targeting Home/Neighbourhoods

It was discussed that the current strategy of the Energy Assistance Package/Home Insulation Scheme was not sufficient to meet the demanding targets of 2020. Whilst there is clearly a role for a national scheme reliant on positive action by home owners, that we also needed both an area based approach targeting the poorest areas of the country and also a need for a reactive system that also tackled whole building/blocks outwith the defined areas of priority treatment.

Managing Enforcement

The issue of who would be responsible for implementing any housing legislation was discussed. It was felt by the great majority of respondents that the EST would not be best placed for this role. Their role was seen as predominantly facilitators for policy change, public promotion, education and latterly as scheme managers in Scotland. It was felt that an enforcement role would not be best suited for an organisation with this sort of portfolio of duties and responsibilities. Local authorities already have a role in enforcement when it comes to the EU Directive on Energy Performance of Buildings. However it was clearly noted that an additional duty to enforce housing standards across all tenures would go beyond the agreements with central Government under the SOA. Therefore additional funding to resource this duty would be required. An example of the implementation of the anti-social behaviour legislation was cited as how a difficult and wide reaching policy aim could be made operational at a local level.

On the whole most respondents would prefer the establishment of a third party managing agent, wholly accountable to the Scottish Ministers. It was also suggested that both managing agent and the local authorities could work in partnership, with the local authorities focussed more on the enforcement side of the policy.

Questions 26-29: The Home Energy Conservation Act

There was a long discussion in the main plenary sessions with regards to HECA. Some of this was also picked up in the breakout sessions.

In 1997, HECA established local authorities as Energy Conservation Authorities with a duty to improve the energy efficiency of ALL tenures across the authority. It was felt by most respondents that this factor needed to remain, regardless of which agency had the duty. If HECA is repealed as a local authority duty in Scotland it needs to be replaced with a new process either as a local authority duty or as the duty of a managing agent that they tackle the issue of poor energy efficiency across all tenures.

It was felt that the information currently presented within progress reports was of little or no value as the reporting of progress in HECA had been rigidly fixed with no account being taken of both new-builds and demolitions in the area. It was also felt that the Scottish Government reporting tool provided to all local authorities was too inflexible and that many authorities felt that their engagement in the process was to churn the same numbers into the tool every two years to produce a figure which in all likelihood was based upon progress of a stock which existed in 1996 or where that was not known at the time, defaulted from the Scottish House Condition Survey report from 1991. Almost all respondents felt that the baseline of HECA was not now reflective of the known current stock. Other than data which would be collected by local authorities on the condition of their own stock it was felt that the provision of a spreadsheet to estimate stock conditions in other tenures did not encourage the same need or desire to extend this data collection to the other tenures. Therefore the information reported in HECA was for the most part only relevant at a national level and was of no practical use at a local level.

The reporting duty of HECA is currently seen by most authorities as a burden. The real focus for local authorities is on delivery of SHQS and the LHS, this is what drives action locally. Beyond the duty across all tenures, there is little more that HECA adds to the duties that local authorities already have in terms of reporting progress to improving domestic energy efficiency. However that said, some respondents noted that HECA had given the debate a focus with the local authority and the simple fact that there was a duty to report on the progress within all sectors allowed the establishment of a number of key partnerships. The main issue surrounds the desire from some authorities that we avoid a period where there is no duty to report. A hiatus in the drive to improve domestic energy efficiency would not be helpful in the long run

as some of the very useful partnerships both internally and externally would be lost. Whatever comes out of the Energy Efficiency Action Plan as a duty to local authorities should recognise and build upon some of the expertise and partnerships which have been nurtured by the existence of HECA over the past 12 years.

It was felt by all respondents that HECA should not be retained in its current format; however we need to have in place duties for local authorities which recognise their role as strategic housing bodies and their expertise in tackling poor domestic energy efficiency. Local authorities are well placed to enable local action however the legislation needs to be there to give teeth to any new duties.

CHAPTER 9: THE PUBLIC SECTOR

SSN would highlight the following factors as critical for an effective EEAP:

- Promoting public sector 'leadership by example' on energy efficiency is vital, and initiatives by the Scottish Government to promote this are extremely important in improving local government performance. We would encourage on-going partnership working between Scottish Government and local government on this, including making best use of existing structures such as the Leadership by Example groups lead by Scottish Government, local authority officers networks (such as SSN, SHON and SEON) and COSLA's Climate Change Task Group and Officer Support Group.
- Emphasis must be given to mainstreaming and embedding energy efficiency within the public sector, making clear the links to legislation, statutory responsibilities and audit regimes. Coordination of public sector energy efficiency activities must be improved, to achieve greater impact and reduced costs. Scottish Government and local government need to work together to chart a course for improved energy efficiency action through the existing and future period of severe public sector financial pressures.
- Existing examples of 'leadership by example', whether in Scotland or elsewhere, on energy efficiency must be identified, promoted and invested in. Clear successes exist in the use of district heating, combined heating and power schemes and Energy Service Companies, as well as other energy efficiency measures, which can be promoted as 'expected'/standard practice elsewhere. Leadership by example needs to become standard practice, and this shift must be accelerated if we are to achieve a 'step change' in energy efficiency and carbon emissions reduction across Scotland.
- Awareness raising, capacity building and job-specific training on energy efficiency is extremely important. Good knowledge and skills exist within the public sector, and more needs to be done to promote good practice more widely. General energy efficiency awareness should be promoted to all local authority officers, managers and politicians, with 'job-specific' training provided in targeted and cost-effective ways (i.e. through existing professional associations and networks).
- Energy data monitoring and reporting should be improved in the public sector, and this should be used to inform awareness raising and training activities. Public sector data needs to be improved both in terms of consistency, robustness and how this is reported/communicated. Improvements should take account of, and build on, investment already made by local authorities in data management.
- While remaining unsure whether a new 'single brand' for energy efficiency in Scotland is needed, improved coordination, communication and accessibility of existing schemes needs to be achieved. The critical and unique role of local authorities needs to be central to any public engagement strategy, and the experience of other public engagement programmes (for example the Waste Aware Scotland initiative) needs to be taken fully into account in developing energy efficiency public engagement initiatives.

Chapter 9 notes from the 10th December consultation event

There was agreement about the key issues between the three groups who considered this chapter but differing views of the best response to these issues. The bullet points below capture the flavour of the discussions and areas of tension or disagreement.

General comments

- *Leadership.*
 - *The Scottish Government Leading by Example initiative is welcome and necessary. The Public Sector will always look to see what Scottish Government is doing in practice to deliver energy efficiency and will tend to interpret this in terms of the appropriate priority and urgency to be given to the subject at a local level.*
 - *It will be essential to take carbon budgets seriously and provide the same degree of scrutiny as is currently applied to financial budgets. The Scottish Government initiative and leadership in this area is welcome and needs to be sustained over time.*
- *Tightening resources.*
 - *This will force further prioritisation and difficult decision making that could provide an opportunity to address energy efficiency through, for example, the rationalising of local authority building stock.*
 - *Expertise will be lost as staff resources reduce and every effort must be made to retain key staff, invest in staff training and recruit qualified staff to key positions to support progress with energy efficiency.*
- *Synthesis.*
 - *Clear and appropriate linkages also need to be made with other drivers such as SOA and Best Value – a joined-up and mutually reinforcing approach.*
 - *Potential role for SSN to highlight the linkages between key drivers for local authorities to support a sustainable Scotland and identify any critical missing links. Networks, such as SSN and SEPA's area waste teams are important for quick and effective learning.*

Question specific comments

- *Capacity building/training (Q38 & 39).*
 - *Identifying and addressing training and skill issues tends to lag behind critical decision taking and so opportunities are missed which may not come around again for many years e.g. investment in new school buildings. Need to accept that this considered approach will take initial time and effort but will result in quicker and more effective action after the initial investment period.*
 - *Functional splits within (larger) local authorities can make it challenging to make the right connections on multi-faceted issues such as energy efficiency. Capacity building tools to support effective communication would be very helpful to secure engagement from all key areas within each authority. Attention could be further focused by high level targets and meaningful redress where targets are missed.*
 - *Training needs to be tailored to meet the precise needs of professional staff e.g. planners, transport and housing specialist, finance officers, etc.*
- *Data and monitoring (Q40).*
 - *Some thought that it would be useful to be able to baseline and benchmark energy efficiency using a single set of data produced nationally. This would need to be interrogated at local level and include information on both the nature of buildings and the type of usage. There should not be a requirement on local authorities to invest in their own sets of data but rather a national standardised approach which accrues efficiencies of scale.*
 - *Others felt strongly that it would be a real waste of time and effort to make local authorities transfer data from current to new software as they have already invested in monitoring systems.*
 - *Everyone agreed on the need for consultation with local authorities before introducing standardised reporting systems and that it was important to make the best use of CRC data and address any gaps and inefficiencies in reporting processes.*
- *Community Planning Partnerships (links to Q42).*
 - *Local authorities provide leadership within CPPs but some feel that take up of the Carbon Management Programme by partner organisations is patchy and that this makes it harder*

to maximise the opportunities for collaborative working around energy efficiency. Local Authorities have the largest building stock with the most disparate uses amongst CP partners but there are still many opportunities for consistent approaches, joint working and efficiencies of scale. A stronger focus on energy efficiency in SOA would help to address this.

- *Audit Scotland concerns (Q45).*
 - *The Audit Scotland report Improving Energy Efficiency in the Public Sector, published a year ago, seems to have resulted in little or no action. This was thought to be symptomatic, by some, of the need for legislative drivers, effective leadership at all levels and meaningful follow-up and monitoring.*

Comments with some linkages to Questions

- *Sticks and carrots (links to Q36).*
 - *A feeling, amongst some, that government is often reluctant to use “sticks” and that this could result in an ever widening gap between the strongest and weakest performers in the public sector. Consensus that accountability is fundamental to success.*
- *CRC (links with Q 36, 40 & 42).*
 - *Some felt strongly that CRC will do the job of legislation so let it take effect before considering the need for any new legislation – gaps are small business, home owners and private landlords.*
 - *Good data will come from this to support comparisons and benchmarking.*
 - *There is significant potential impact on the private sector though cap and trade. Transfer of funds from public to private sector through CRC – is this a good idea?*
 - *The on-going scrutiny of the Carbon Management Programme should continue until CRC bites, to understand the progress being made and the contribution to reductions in energy use.*
- *Public engagement (links to Q37 and Q44).*
 - *Influencing behaviour is fundamental to sustainable development, climate change and energy efficiency.*
 - *It is essential to harness individual motivations to achieve energy efficiency goals by providing real-time information (e.g. smart meters), information related to current issues (e.g. flooding), by keeping it fresh (e.g. making energy production and use more visible through demonstration activities such as cycling to produce energy for immediate use) and making a low carbon lifestyle aspirational and desirable (e.g. designer bags for life).*
 - *Awareness campaigns are tricky and we should learn from successes, such as Waste Aware Scotland, and address capacity issues by providing support and tools. It is important to understand the role played by the potential for incurring significant fines if sufficient progress is not made and the substantial funding provided to support implementation.*
 - *CPP should play an important role in energy efficient education and awareness with local communities.*
 - *Language should be simple and direct wherever possible but also recognise where more complex understanding is required and use more sophisticated language where appropriate – horses for courses.*
- *Delivery of advice - Energy Scotland (links to Q43 and 44)?*
 - *Some thought that it would be best to merge all energy efficiency support bodies into one organisation to reduce confusion amongst customers and make the best possible use of the funding being provided. A single body to provide advice, support, funding and a similarly streamlined approach to monitoring and audit. The Comprehensive Area Assessment approach which brings together multiple audit and assessment function in England would merit further investigation to understand the benefits of focusing attention on a single report.*
 - *Others believed that you work with the structures that you have as brands and roles are fairly well understood and that a new organisation would need to start again leading to delays and inefficiencies in the interim.*
- *ESCO and CHP (links to Q44).*

- *Important to learn from the success in Aberdeen City where they have achieved reductions in energy & carbon use, addressed fuel poverty, developed social enterprise and generated funds for the local area.*
- *It was thought that there is little growth in such approaches because: they require long term funding (not stop/start); a capital grant programme to kick start because of high start-up costs; and require active management. Some thought a Scotland-wide delivery model would deliver scale benefits and allow re-investment in new start-ups and thus overcome some of the challenges. Others were concerned that scale could bring be issues of competition with utility companies and a significant legislative burden.*
- *Could also learn from the Community Energy Programme as, whilst the funding was never fully utilized, Scotland secured 40% of the total funding.*

CHAPTER 11 – CHANGING HOW WE USE OUR TRANSPORT SYSTEM

SSN would highlight the following factors as critical for an effective EEAP:

- Local authorities are making progress on reducing their fleet transport energy consumption and associated CO₂e emissions, and there is broad support for the 2020 LCV target for public sector fleet. Local Authority Carbon Management Plans are key drivers of action on fleet emissions. However, reduction of light-vehicle fleet and pool car provision by some local authorities has simply led to private vehicles being used for business travel. Also, some local authorities have mentioned concerns that the CRC Energy Efficiency Scheme may produce disincentives to investing in electric vehicles, as this will lead to an increase in a local authority's electricity consumption.
- A whole life assessment of vehicle procurement, use and disposal needs to inform choices made by the public sector in moving to a low carbon transport sector. Concerns exist about a 'quick fix' of shifting from petrol/diesel vehicles to electric vehicles with little regard to overall energy and resource consumption impacts.
- Land use planning has a critical role to play in addressing Scotland's transport energy demands, notably in developing communities that are less dependent on private vehicle use and better connected to public transport and active transport infrastructure. There is a need to place more emphasis on the effective and progressive use of SPP17 Planning for Transport at a local authority level. Concerns exist among local authority officers that if a council implements a progressive energy use reduction policy developers will simply move elsewhere and displace the same developments to another council area. Land use planning will also be critical in planning the development of electric vehicle infrastructure, and the Scottish Government and local authorities must work together to develop plans for this. Scottish Government guidance and support for Local Transport Strategy development will also be critical.
- The Scottish Government and local authorities should continue to invest in scenario planning and policy analysis to inform land use and transport strategies. The use of methods such as SSN's Local Footprints work and the use of tools such as the Resources and Energy Analysis Programme (REAP) have proved useful in tackling this, and further investment and development would be useful.
- Scottish data shows that we are far from achieving a step-change in reducing transport-related carbon emissions and related energy demands. SSN considers that this is in part an outcome of a transport network which favours the use of private motor vehicles over public and active travel options. A variety of interventions could be used to shift this picture towards more sustainable travel behaviours. While the Scottish Government and local authorities are investing in many of these interventions, investment and prioritisation is not yet significant enough, and the SSN would call this for this situation to change as a priority for the EEAP and other Scottish public sector policies and programmes.

Chapter 11 notes from the 10th December consultation event

2020 Ambition LCV Fleet in the Public Sector

When asked what the delegates thought of the 2020 target there was general agreement that the target was achievable if procurement officers and fleet managers were encouraged to deliver the ambition as councils are likely to turn over their full fleet by that time. In fact a few councils are already evaluating their fleet use and upgrading vehicles to more efficient options.

A substantial disincentive for the public sector to change their fleet to electric is the Carbon Reduction Commitment (CRC). Currently, fleets are not included in the CRC. If councils change their fleet to electric vehicles, for example, they would then be included in their CRC reporting requirements.

A few councils mentioned that through work with the Carbon Management Programme, that they are already addressing fleets by changing the vehicles to LPG or other more efficient technologies. However, some participants mentioned that their light vehicle fleet have been significantly reduced or completely removed council pool cars. In these cases, individuals are using their private vehicles for business purposes. This provides a new problem that business mileage is likely to increase and must be addressed – leadership and guidance needed from the Scottish Government.

A general comment on statutory obligations was made and agreed by all groups. More pressure will be applied on local authorities to focus on efficiency savings, shared services and delivering only statutory obligations. There was an agreement that if a 2020 LCV target was put into place, that it would need to be audited and enforced to ensure implementation – especially if the costs were higher than business as usual contracts.

Transport Techno Fixes

There was also agreement that the wider environmental impacts and life cycle costs of electric vehicles must be considered when promoting an exchange of fleets. (In particular - resources required for batteries and disposal). Several respondents were concerned that there is a general government dependence on technologies and that we will be continuing consumption at the same rates – just in electric vehicles!

Land Use Planning

There was debate as to whether the Town and Country Planning Act and the NPF2 can deliver reductions within the transport sector. A few people stated that the Act has a deficiency that does not allow local authorities to priorities 'localising' services and retail – and that this means that the contributions from the planning authority can be negligible – especially as this planning system is only in relation to new developments and the occasional house retrofit. There was some agreement that in order to deliver reductions in energy from the transport sector – there is a need to enforce/regulate the guidance like SPP17. The problems/concerns still exist that if a council implements a stringent energy reduction policy that the developers will simply move and displace the same developments to another council area.

The groups agreed that if electric vehicles are the technology of choice, the planning system will be important for putting the infrastructure in place to make the shift.

A few people mentioned that there is a potential policy gap developing within transport planning in local authorities. Several Local Transport Strategies (LTS) are coming to an end in Scotland and there is no Scottish Government advice or guidance to update these documents.

Transport Network and Modal Shift

There was general agreement that the Scottish transport network is encouraging increased use of private vehicles. And that in order to change this trajectory that the Scottish Government needs to provide leadership by investing and regulating roads transport sector.

Various policies and interventions that encourage people to use the roads network were discussed including:

- *Improvements to the network to reduce congestion and make*
- *Significant investment in roads*
- *Free parking spaces for businesses and at local authorities*

In contrast, public transport is not sufficiently incentivised to encourage modal shift. In many parts of Scotland, public transport is seen as the low status transport options because it is:

- *High cost*
- *Less convenient than personal vehicles*
- *Uncomfortable*
- *Unsafe (especially at night)*
- *Flexi time and job share – increasing need for personal transport and reduces individual interest in car sharing*

The groups mentioned several policies that might (and in some instances are being used by local authorities) encourage people to change to public transport and/or walking and cycling:

- *Variable road pricing*
- *Stringent parking restrictions (e.g. near schools)*
- *Car sharing incentives (e.g. priority parking spaces at work)*
- *Regulation of the bus companies*
- *Developing individual transport plans to identify why and to which mode individuals would switch from their car*
- *Area or regional travel policies and interventions are necessary (e.g. city versus rural needs are very different – for example electric cars may not be viable in rural areas whereas biofuels may be).*

It was evident in all groups that transport is a huge challenge, not least because people are emotionally attached to their cars and individual choice.

Is a New, Single Energy Brand Needed

There was consensus that there is still cluttered and confused messaging on energy; not least because very few people consider transport to be within the ‘energy sector’.

Some contributors felt that a concerted communication effort was needed for all audiences in concert (e.g. public, businesses and public sector). They felt that the Go Greener campaign was not enough – and some mentioned the national KSB waste/recycling campaigns as a good exemplar to emulate. Others mentioned the energy campaigns from the 1970s as good concerted national information.

Branding Related to Funding

Some stated that the Energy Saving Scotland Energy Advice Centres (ESSACs) have helped reduce confusion but that the delivery mechanisms (especially the various funding streams) are still burdensome.

Some contributors wanted a more central funding mechanism that is simple and easy to access for anyone - people, business and the public sector to make energy efficiency improvements. These people said that they didn’t want a different application process and criteria for different organisations. In particular, people commented that funding is under spent because of hopes and limitation of criteria (e.g. CEEF). Some people mentioned that they wouldn’t consider EU funding because of the work required simply to apply.

Transport Behaviour Change

Several people mentioned that if national communications, branding, and improved public transport and active travel links were made that more behaviour changes would be expected.

A few participants mentioned community groups (some funding by Climate Challenge Fund) are encouraging behaviour change and through leadership, infrastructure and improved information campaigns that a concerted reduction in energy was possible. A few participants mentioned community groups in their local authority areas that are working with their councillors and asking for help as described above. However, although there is funding (like CARES, CCF etc) the same systemic problem occurs with mixed messages and funding criteria as described earlier. Groups agreed that the current system is not encouraging nor incentivising behaviour change, some people went further to say that penalties for high energy consumption behaviour are also necessary.

Consultation event notes, in italics, were written by discussion group facilitators: Scott Restrict (Energy Action Scotland), Barbara Atterson (Energy Action Scotland), Liz Bogie (Sustainable Scotland Network) and Amie Fulton (Sustainable Scotland Network)

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