



Learning Brief Seven – December 2009

Conserve & Save: A Consultation Event on the Scottish Government's Energy Efficiency Action Plan

Introduction

The Sustainable Scotland Network (SSN) exists to support information sharing and delivery of sustainable development across local authorities in Scotland. For more information on SSN, visit our website: <http://www.sustainable-scotland.net/>

Who is this learning brief aimed at?

This Learning Brief is aimed principally at SSN members, and others who have an interest in the Scottish Government's Consultation on the Energy Efficiency Action Plan for Scotland.

Overview of the Consultation Event

In December 2009 SSN held a national consultation event in partnership with the Scottish HECA Officers' Network (SHON) and the Scottish Energy Officers' Network (SEON) on the Scottish Government's Energy Efficiency Action Plan (EEAP). The event provided local authority officers from the three networks with both a briefing on the consultation document and an opportunity to discuss views on the consultation questions. The responses were used to inform network and local authority consultation responses.

The Scottish Government Consultation on the Energy Efficiency Action Plan for Scotland was published on 8 October 2009. The Climate Change (Scotland) Act committed the Scottish Government to prepare and publish a plan for a) promoting energy efficiency; and b) improving the energy efficiency of living accommodation. The consultation document sets out a comprehensive approach to energy efficiency by the Scottish Government and the public sector in Scotland, focusing on its impact on energy and economic development, housing and transport and on the role it can play in delivering climate change targets.

The consultation period for the EEAP concludes on 5 January 2010. It is the Government's intention to publish the finalised EEAP in Spring 2010. The consultation document and further background information on the EEAP can be accessed at: <http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Action/energy-efficiency-policy/ActionPlan>.

The programme for the consultation event can be accessed on the SSN website here: <http://www.sustainable-scotland.net/page.asp?pg=18>

Presentations

Presentation on the Consultation Document: Scottish Government

Suzanne Le Miere, from the Scottish Government's Energy Efficiency and Microgeneration Unit, provided delegates with an overview of the consultation document. The PowerPoint slides that accompanied this presentation can be accessed on the SSN website here:

<http://www.sustainable-scotland.net/page.asp?pg=18>

Opening Remarks: The Climate Change (Scotland) Act provided that a finalised Energy Efficiency Action Plan should be published within 12 months of the order being laid before Parliament, and the Government intends to publish the completed EEAP in Spring 2010. A decision was made to draft a long consultation document in order to draw all relevant information into one place, and to provide users with a thorough overview of the issues.

The EEAP is split into three parts: Strategic Context, Energy Efficiency across Sectors; and Moving Forward. A summary of the consultation document can be accessed on the internet here:

<http://www.scotland.gov.uk/Resource/Doc/918/0087764.pdf>

Chapter 4: Targets. The consultation document contains two options for how the Scottish Government could set energy efficiency targets:

- Scottish energy efficiency targets could be based on energy savings to be achieved through specific government policies and programmes. This would not take into account potential growth in consumption in other areas and so total energy use may not decrease by exactly the same amount.
- An alternative target would be an absolute end-use consumption reduction target.

Most EU states have elected to set targets based on energy savings from programmes and policies. Scottish targets will have to work alongside UK targets, which therefore impacts on how ambitious Scottish targets can be.

Chapter 6 and 7: Strategic Housing Issues and Housing Regulation. The chapters on housing are seen by the Scottish Government as "a consultation within a consultation". Chapter 6 focuses on strategic housing issues, and uses a housing carbon model to provide cost estimates of meeting 2020 emission targets. Much of the research in this chapter is derived from the report "Modelling Greenhouse Gas Emissions from Scottish Housing", which was published by the Scottish Government on 8 October alongside the consultation and can be accessed here:

<http://www.scotland.gov.uk/Publications/2009/10/08143041/0>. Chapter 7 focuses on housing regulation. This is the first time that the Scottish Government has been able to consult on this issue. The chapter therefore asks some broad questions on regulation, and slides 13 and 14 of the presentation outline some of the key issues addressed in Chapter 7.

Chapter 9: The Public Sector. The public sector is responsible for only 2% of Scotland's greenhouse gas emissions but has significant influence on this agenda through procurement, its large number of staff, ensuring new public buildings are highly energy efficient etc. The Scottish Government sees the public sector "leading by example" on energy efficiency.

Chapter 12: Enterprise and Skills. The chapter focuses on how to ensure Scotland can grow an energy efficiency "sector" to take advantage of the growing demand for energy efficiency products and services. The chapter also looks at how to ensure that a workforce with appropriate energy efficiency-related skills is in place to capitalise on the growth of demand. It was noted that although there has in recent years been a skilling-up of the workforce in the area of renewables, this is less so the case in other areas of energy efficiency, e.g. solid wall insulation.

Critical Questions for Local Authorities in the Energy Efficiency Action Plan: WWF Scotland

Elizabeth Leighton, Senior Policy Officer at WWF Scotland, delivered a presentation to delegates focussing on the parts of the EEAP that were most critical to local authorities. The PowerPoint

slides that accompanied this presentation can be found on the SSN website here:
<http://www.sustainable-scotland.net/page.asp?pg=18>

It was noted that the consultation document was “long” and “difficult”. Although it was useful in terms of context, it was “lacking in policy appraisal options”, meaning that respondents had to do “a lot of the work for themselves”.

Context: Scotland has committed to world-leading emissions reductions targets through the Climate Change (Scotland) Act. Scotland must have a world-leading delivery plan that ensures we can meet these world-leading targets. Energy efficiency is the most equitable and cheapest way to work towards meeting Scotland’s emissions reduction targets.

Why Respond?: Local Authorities are the “best or only partner” in delivering many of the proposals contained in the consultation document. Furthermore, the public sector now has a duty to contribute to the climate change agenda under the Climate Change (Scotland) Act. However, local authorities are facing up to a period of constrained resources, so it is therefore important to find ways of doing things differently. It was suggested that local authorities should be specific in their “asks” to government, for example highlighting which tools and resources are needed.

Targets (Chapter 4): Targets are important, as they drive change. WWF Scotland believe that both total consumption and usage are important when setting targets. The WWF Scotland supported report, “The Power of Scotland Renewed”, suggests possible targets. The full report can be accessed here: http://www.wwf.org.uk/research_centre/?3172/The-Power-of-Scotland-Renewed

Behaviour Change (Chapter 5): Because local authorities are on the front line, they are uniquely placed to motivate and enable behaviour change. It was noted that leadership is critical when encouraging others to change their behaviour (see the Sustainable Development Commission report “I Will If You Will”: <http://www.sd-commission.org.uk/publications.php?id=367>). There may also be lessons to be drawn from the Waste Aware Scotland campaigns, which have enabled change in the reduce, reuse, recycle agenda. “Choice editing” – removing the unsustainable choice – was also seen to be an important tool in behaviour change. Education has an important role to play, but even when people have the right information, they are making easy changes but not hard changes. It was noted that further research needs to be undertaken to understand “values based change”.

Housing (Chapters 6 & 7): A big change is required in this sector. WWF sets out their approach in the report “Carbon Countdown for Homes” which can be accessed here: http://scotland.wwf.org.uk/research_centre/index.cfm?2121 . This report recommends area-based, whole-house (not piecemeal) retrofits, and focuses on reducing fuel poverty. Slide 12 shows that only a small amount of progress on improving the energy efficiency of our homes has been made under existing programmes. Indeed, the consultation notes that existing programmes will only deliver a 9% emissions reduction by 2020. It is clear that much bigger changes on a national scale are required, and no more pilot programmes should be undertaken.

Financing: It is estimated that £16bn is required to finance a 42% reduction in greenhouse gas emissions by 2020. It was suggested that there needs to be a more attractive financial environment that leads people to invest in their homes and businesses. Loan schemes need to be marketed more effectively, and more government investment is required. Minimum standards should be introduced so that homeowners have to improve energy efficiency standards. WWF suggest that minimum standards should be applied to the whole of the housing sector, perhaps in stages, with the private rented sector targeted first.

Local Authorities and Homes: It was suggested that local authorities should consider which housing tools they already have at their disposal and whether they require further tools. There may be lessons to be learned from SHQS that could be applied to minimum standards. It was argued that planning processes need to move to a presumption in favour of renewables, and that microrenewables should be seen “not as a blemish but a badge of honour”.

Cross-Cutting Issues: WWF Scotland felt it was disappointing that district heating was not given more prominence in the consultation document. It was suggested this was an exciting prospect that had yet to take off in Scotland. Better seed funding was required to increase the number of district heating schemes, and planning processes needed to be improved. Further investigation is required to understand why district heating has not taken off.

Perspectives from the Scottish HECA Officers Network (SHON):

The Home Energy Conservation Act 1995 (HECA) has been in place for over ten years, and the Energy Efficiency Action Plan consultation document asks for respondents' views on whether the arrangements for HECA "remain fit for purpose in the context of the new relationship with local government, set out in the Concordat, and the powers and duties contained within the Climate Change (Scotland) Act."

Stephen Cunningham of West Lothian Council, and Chair SHON since 1998 delivered a short presentation on his thoughts on the future of HECA.

It was argued that HECA was "no longer fit for purpose" and "an impediment to moving forward". Although some cities, e.g. Aberdeen, had used HECA as a "great brand" with which they have made progress, this was seen as "force of personality, and not HECA".

The HECA reporting process was seen as poor, did not reflect real progress, and was afflicted by "historic" baselines. It was felt that HECA did not drive local authorities to progress energy efficiency, and the SHQS was more effective in this regard.

Janice Lyon of Aberdeen City Council also contributed to the debate on HECA. Although it was felt that HECA was important, and can be used to encourage and cajole local authorities to progress energy efficiency, it was argued that what was now required was a "duty with teeth" that will really cause local authorities to deliver on this agenda.

SHQS only deals with 30% of housing stock, so other ways were needed to deal with the worst housing stock. HECA was not fit for purpose, but it was argued that a "son of HECA" was required, that gives local authorities an "actual duty" to improve energy efficiency across the whole housing stock.

Consultation Process

Facilitated workshops were held to gather delegates' views on the EEAP. The finalised SSN consultation response will be available on the SSN website in due course.

For further information on the December Quarterly, please contact Anna Hunter, SSN's Information Officer, on 01786 468 768 or by email: anna.hunter@ksbscotland.org.uk