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Energy Efficiency and Microgeneration Strategy  
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11 June 2007

Dear Sir/Madam

### **Achieving a Low Carbon Future - A Strategy for Scotland Consultation Response**

Forward Scotland welcomes the opportunity to contribute to the Scottish Executive's consultation on its draft Energy Efficiency and Microgeneration Strategy for Scotland. Overall, we support the proposed actions detailed in the draft Strategy.

Our enclosed response recommends the following key actions:

- Develop and implement the proposed Action Plan as soon as possible
- Ensure the Strategy is in line with the imminent Renewable Heat Strategy
- Ensure targets and progress reports are developed using a sound statistical base
- Advice to householders should make it clear that energy efficiency measures should be tackled before microgeneration measures are installed
- Set targets for proportion of schools to achieve Green Flag status in the Eco Schools Programme, supported by resources and training to embed energy efficiency and microgeneration in learning
- Develop a long-term, stable funding support mechanism for microgeneration
- Provide sufficient training for planners on implementation of microgeneration policies to ensure comprehensive, consistent approach across authorities

Forward Scotland would be delighted to offer our experience and expertise to help make this Strategy a reality, and looks forward to supporting the work of the Executive in promoting sustainable development. We would be pleased to meet with you if clarification or further detail is required.

Yours faithfully



**Theo Leijser**  
Chief Executive

**Scotland's Energy Efficiency and Microgeneration Strategy  
*Achieving a Low Carbon Future - A Strategy for Scotland***

**A CONTRIBUTION FROM FORWARD SCOTLAND**

**Introduction**

Forward Scotland welcomes the opportunity to respond and provide feedback to Scotland's draft Energy Efficiency and Microgeneration Strategy. We are happy to have this response placed in the public domain, and invite questions or further discussion on any issues raised in this document.

Forward Scotland supports action for sustainable development through practical projects and research. Our mission is to champion innovative approaches to sustainable development. We work to inspire a culture where the benefits of sustainable development are understood, valued and achieved. To do this we aim to promote sustainability in the widest sense in ways that change people's perceptions, attitudes and behaviour, while also achieving economic vitality, social wellbeing and a good quality environment for all.

Our response is based on ten years of experience promoting sustainable development in Scotland, and of managing and delivering grant schemes which have supported a significant number of communities, social enterprises and other organisations to contribute to sustainable development in a number of areas.

**Overall Comments on the Consultation Draft**

Forward Scotland welcomes the actions proposed in the draft Strategy and supports the development and implementation of the proposed Action Plan without delay. The length of time taken to deliver this draft Strategy and the timing of the 2007 Scottish Parliamentary elections mean that there is considerable uncertainty about a future Strategy on energy efficiency and microgeneration. We would therefore urge the Scottish Executive to provide prompt reassurance that the proposed Action Plan and key actions outlined in this consultation document will be pursued as quickly as possible.

Forward Scotland has responded to the Scottish Executive's consultation questions in turn, offering the following comments.

**1. Do you agree with the overall approach taken in this draft strategy for improving energy efficiency and encouraging greater uptake of microgeneration? If not, why not?**

Forward Scotland supports the overall approach taken in the draft Strategy and welcomes the Scottish Executive's commitment to publish an Action Plan in 2007, drawing together existing and future commitments towards promoting energy efficiency and microgeneration, and setting targets. This Plan should give the Executive strategic purpose and the confidence to be ambitious.

When completing the final Strategy and compiling the Action Plan, we would urge that the work currently underway by the Executive towards producing a Renewable Heat Strategy is

fully taken into account. This should ensure that a streamlined, integrated approach is taken across these inter-related areas and avoid conflicting measures and duplication. As part of a decentralised energy framework for Scotland, district heating networks should be developed wherever suitable to provide low carbon, efficient and affordable heat to users, and it is important that the Action Plan is in line with the Renewable Heat Strategy in this respect.

The Executive's commitment to report on progress towards targets and carbon savings associated with the various actions on an annual basis is welcome provided it is measured using a robust methodology. Progress reports, targets and measuring the carbon contribution of policy require a sound statistical base otherwise the management required to help grow the sector to provide solutions in this area will be difficult to achieve.

## **2. Do you have any views on the key actions covered in the draft strategy summarised in Chapter 8 - Conclusions and Next Steps?**

Forward Scotland supports the key actions highlighted in the draft Strategy. In particular, we wish to comment on the following actions:

- **Introduce a one-stop shop approach to advice for householders on energy efficiency, sustainable transport and renewable energy**

Forward Scotland supports this action but notes that moves are already being made to rationalise the services of the Energy Savings Trust network of Energy Advice Centres incorporating a broader remit including renewables.

Forward Scotland believes that it is important for any proposed advice portal to also cover low-carbon microgeneration technologies, such as gas-fuelled CHP<sup>1</sup> and fuel cell systems in order to provide a holistic, integrated service. Clear priority should be given to the promotion of energy efficiency as a 'the first step', with microgeneration seen as 'the next step', to achieve the greatest carbon savings at least cost.

- **Encourage greater energy efficiency and uptake of microgeneration across the public sector estate, especially in schools and encourage every school to register on the Eco Schools Programme and striving for the Green Flag**

Forward Scotland welcomes this proposal and acknowledges the efforts of NHS Scotland in pursuing wood fuel heating when phasing out existing systems and as part of new build. Equally local authorities such as North Lanarkshire Council have been ambitious and willing to take a measured risk when refurbishing a number of secondary schools again incorporating wood fuel.

Forward Scotland believes that the public sector needs to play a more active role in incorporating energy efficiency and renewables into its investment decisions for the public estate. It is hoped that the failure to ensure a significant element of renewables in the PPP programme for schools will not be repeated in future.

Forward Scotland recommends that resources and training are put in place to enable school staff to use energy efficiency and microgeneration technologies to make their school a 'building that teaches'. These resources should be strongly linked to the new Curriculum for Excellence and Eco Schools Programme to ensure that energy efficiency and microgeneration are embedded within learning and teaching activities and not seen as an 'add on'. Forward Scotland is encouraged by research and guidance produced by the Lighthouse's SUST programme for commissioning agents for Schools and its educational tools for school children. The Scottish Executive works with the Sustainable Development Education Liaison Group (SDELG), managed by Learning and Teaching Scotland, to develop these and other resources.

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<sup>1</sup> Combined heat and power

- **Invest a further £2 million in grant support through the Scottish Community and Householder Renewables Initiative (SCHRI)**

Rather than the type of piecemeal funding that has been directed towards SCHRI of recent years, a longer-term, more stable and substantial grant programme would be preferable in order to give both applicants and suppliers greater confidence. Adapting the Energy Efficiency Commitment (now renamed the Carbon Emissions Reduction Target) 2008-11 to include microgeneration (as proposed in the current consultation from DEFRA), and in particular to incentivise renewable heating technologies, would be a welcome alternative, or complement, to SCHRI. We would therefore urge the Executive to work with the UK Government to bring about these changes. It is crucial that the SCHRI scheme is compatible with any new CERT mechanism in order to avoid confusion and ensure that all eligible measures are adequately supported.

- **Awareness raising campaigns on energy efficient products and the ecological footprint of goods and services**

Forward Scotland strongly welcomes this action. Our activities involve encouraging informed public debate about sustainable consumption and we would be delighted to work with the Executive to develop this action further.

### **3. The draft Strategy states that we will consider targets to be included in the final Strategy and Action Plan:**

- a) **Do you have any views on specific targets referred to within the draft?**
- b) **Are there any other targets which you believe should be considered?**

Forward Scotland welcomes this commitment provided it translates into policy initiatives in awareness raising, education, financial support, planning and building standards. Targets can provide strong market signals to potential investors in the microgeneration sector and also provide an inspirational vision for policy makers if set in a positive context. However, any targets must be supported by holistic and robust policies in order to stimulate investment in the Scottish market.

### **4. Are there any other comments you would like to offer on this strategy in relation to the promotion of energy efficiency and microgeneration in Scotland?**

Forward Scotland welcomes the pilot schemes underway in Scotland and UK-wide to test the potential of improved billing methods, real-time displays showing electricity use and cost, and smart meters to provide instant updates on energy consumption (and generation). We believe that such measures could play a significant role in raising awareness of energy use among consumers and promoting energy-saving behaviour. In order to reap these benefits at the earliest opportunity, we would urge the Executive to work with the UK Government to ensure that these measures are rolled out to homes, businesses and the public sector as soon as possible.

We support the Executive's commitment to make it easier to install microgeneration technologies by removing planning barriers. The recent consultation for SPP 6 Renewable Energy and this draft strategy appear to be consistent and provide a framework to improve the process for installing microgeneration. However, in order to ensure that planning policies are implemented appropriately and in a consistent manner across all planning authorities, we would urge the Executive to ensure that planners are provided with sufficient training to implement microgeneration policies with complete confidence. Forward Scotland would be delighted to work with the Scottish Executive to bring together organisations and individuals with the appropriate experience and expertise to develop this training.

## **5. If you are responding on behalf of an organisation, how do you think your organisation will/can contribute to the success of the strategy?**

The work of Forward Scotland will contribute to the success of this Strategy through our activities to:

- raise awareness of sustainable development issues and actions through public debate
- inform, educate and support communities in developing projects towards greater social, economic and environmental outcomes
- engage with businesses to develop corporate social responsibility and make stronger links to communities
- inspire communities to reduce resource use and develop green energy projects through publishing case studies on the Community Webnet<sup>2</sup>
- increase opportunities for learning and exchange by supporting efforts to encourage the identification and exchange of good practice in sustainable development
- encourage greater innovation by establishing an investment programme to support academic, business and community groups to explore new ideas, collaborations and partnerships to expand our knowledge and ability to meet future challenges
- establish a programme that recognises the achievements of individuals to inspire others to push the boundaries in society leading us to stronger sustainable communities

### **Conclusion**

Forward Scotland welcomes the actions proposed in the draft Strategy and supports the development and implementation of the proposed Action Plan, including targets where appropriate, as soon as possible. We would be delighted to offer our experience and expertise to help make the Energy Efficiency and Microgeneration Strategy a reality.

The Executive has consistently supported the approach taken by Forward Scotland as we have worked across the spectrum of sustainable development related activity with public bodies, private companies and community organisations.

As a result the organisation has developed a range of skills and experiences that we intend to apply to meet the emerging challenges of sustainable development in Scotland. We welcome the opportunity to contribute to this consultation and we look forward to supporting the work of the Executive in promoting sustainable development. We would be pleased to meet with you if clarification or further detail is required.

Forward Scotland  
June 2007

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<sup>2</sup> [www.CommunityWebnet.org.uk](http://www.CommunityWebnet.org.uk)