

Report To:	Environment and Regeneration Committee	Date:	15/06/2017
Report By:	Corporate Director, Environment, Regeneration and Resources	Report No:	ER&R/CMT/SJ/
Contact Officer:	Stuart W Jamieson	Contact No:	01475 712402
Subject:	Scottish Government consultations on the Future of Energy Provision in Scotland		

1.0 PURPOSE

- 1.1 The purpose of this report is to inform the Committee of the publication of a number of Scottish Government consultations concerning the future of energy provision in Scotland, and to seek approval of responses that were submitted on behalf of the Council.

APPENDIX

2.0 SUMMARY

- 2.1 On 19 January 2017, the Scottish Government laid its new Draft Climate Change Plan before Parliament with a 60-day period set for Parliamentary scrutiny. A report on the Draft Climate Change Plan was presented to the Environment and Regeneration Committee meeting of 2 March 2017. The Draft Climate Change Plan has set a target to reduce greenhouse gas emissions in Scotland by 66% by 2032.
- 2.2 Energy accounts for around 30% of Scotland's greenhouse gas emissions. Reducing emissions from energy through reducing energy demand and provision of energy via zero/low carbon technologies is seen as essential in meeting climate change targets. The Scottish Government has, therefore, published a number of consultations concerning energy as companion documents to the Draft Climate Change Plan. These are: Draft Scottish Energy Strategy; Scotland's Energy Efficiency Programme; Local Heat and Energy Efficiency Strategies and Regulation of District Heating; Onshore Wind Policy Statement; and Unconventional Oil and Gas. The draft responses to these consultations are set out in Appendices 1-5.
- 2.3 The Draft Scottish Energy Strategy is a long-term vision for the future of energy in Scotland. The draft response (Appendix 1) broadly agrees with the vision to combine energy efficiency and conservation with decarbonising the energy supply. Scotland's Energy Efficiency Programme is a 20 year programme which considers how energy efficiency and decarbonising the energy supply can be delivered. The draft response (Appendix 2) regards legislation and regulation, investment in skills and innovation and fiscal stimuli to be important in successful delivery. The Local Heat and Energy Efficiency Strategies and Regulation of District Heating consultation paper proposes placing a duty on local authorities to produce and implement Local Heat and Energy Efficiency Strategies with particular consideration given to district heating and its regulation. The draft response (Appendix 3) agrees with this and states the importance of feasibility, engagement, licensing and supplier and consumer protection with respect to district heating. The Onshore Wind Policy Statement seeks views on how onshore wind can best be supported. The draft response (Appendix 4) regards maximising electrical output, electrical storage, environmental and other impacts and local benefits to be important considerations with regard to wind power. Unconventional Oil and Gas refers to the extraction of shale gas and oil and coal bed methane through technologies such as hydraulic fracturing commonly referred to as 'fracking'. The draft response (Appendix 5)

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is that this should not be pursued due to the potential health and environmental impacts and its contradiction with the aims of the Draft Climate Change Plan.

3.0 RECOMMENDATION

- 3.1 It is recommended the Environment and Regeneration Committee:-
- (a) note the publication of the above consultation documents; and
 - (b) approve the Council's responses to the consultations set out in Appendices 1-5.

Stuart W. Jamieson
Head of Regeneration and Planning

4.0 BACKGROUND

4.1 In 2009, the Climate Change (Scotland) Act was passed by the Scottish Parliament. The Act set an overall greenhouse gas emissions reduction target of 80% by 2050 with an interim target of 42% by 2020 from a 1990 baseline. The most recent Scottish Greenhouse Gas Emissions Data covering the year 2014 showed that Scotland had achieved a 45.8% reduction, thereby exceeding the interim target. In light of this, the Scottish Government published a Draft Climate Change Plan in January 2017, which set a new national target to reduce greenhouse gas emissions in Scotland by 66% by 2032 from a 1990 baseline.

5.0 CONSULTATION DOCUMENTS

5.1 To accompany the Draft Climate Change Plan, the Scottish Government has released a number of publications for consultation on the future of energy provision in Scotland. Energy accounts for around 30% of Scotland's greenhouse gas emissions and is, therefore, seen as crucial to meeting the objectives laid out in the Draft Climate Change Plan. The consultation documents concern the improvement of energy efficiency and the provision of energy, notably heat, in Scotland. In order to meet consultation deadlines, responses have already been submitted to the Scottish Government, subject to Committee approval.

Draft Scottish Energy Strategy

5.2 The main companion document to the Draft Climate Change Plan is the Draft Scottish Energy Strategy. This details a long-term vision for energy provision in Scotland to the year 2050. The vision is aligned to three themes: a whole system view of energy policy; a stable, managed energy transition to one that is zero/low carbon; a smarter model of local energy provision through decentralised or distributed energy systems. This is a high-level document which essentially seeks views on what the energy future in Scotland should look like.

5.3 The Council's response to the Draft Scottish Energy Strategy consultation is set out in Appendix 1 and broadly agrees with the vision set out by the Scottish Government. The combined efforts of reducing energy demand through energy efficiency and conservation and decarbonising the energy supply is essential in meeting climate change objectives. In terms of energy supply, there should be a mix of zero/low carbon technologies and flexibility incorporated for new technologies that come on board. Support should be given for upscaling existing technologies and research and development into emerging or new technologies. The Council supports collaboration between national and local government and the private and third sectors. Local authorities have a particular role to play in terms of local energy systems.

Scotland's Energy Efficiency Programme (SEEP)

5.4 In June 2015, the Scottish Government designated energy efficiency as a National Infrastructure Policy in its Infrastructure Investment Plan. The Scottish Energy Efficiency Programme is the cornerstone of this, aiming to reduce energy demand and decarbonise the heat supply to buildings while tackling fuel poverty. The programme is a long term one, being rolled out from 2018 and expected to last up to 20 years. The Scottish Government estimates overall investment in excess of £10 billion and it has committed to investing £500 million in energy efficiency and combating fuel poverty over the next four years. The consultation mainly concerns how the Scottish Energy Efficiency Programme can be delivered.

5.5 The Council's response to this consultation is set out in Appendix 2. The Council holds the view that incorporating the highest standards of energy efficiency and low carbon technologies within legislation and regulation will be important in meeting its objectives. There should also be investment in innovation and skills training to implement the

required measures. Financial incentives and disincentives can further stimulate investment in energy efficiency and low carbon technologies. Examples of this are Feed In Tariffs and the Renewable Heat Incentive. Adopting an area-based approach is also advised since this has worked well in the Home Energy Efficiency Programme for Scotland Area Based Schemes.

Local Heat and Energy Efficiency Strategies (LHEES) and Regulation of District Heating

- 5.6 The consultation which has particular implications for the Council is the Local Heat and Energy Efficiency Strategies and Regulation of District Heating document. The Scottish Government proposes that local authorities be required to create Local Heat and Energy Efficiency Strategies to support the delivery of heat decarbonisation and energy efficiency objectives. In addition, it is proposed that regulation be put in place to specifically support the development of district heating. This would include provisions for zoning of areas for heat networks and connecting users.
- 5.7 The Council's response to this consultation is set out in Appendix 3. The response agrees with the proposal to place a duty on local authorities to produce and implement a Local Heat and Energy Efficiency Strategy. This would provide an impetus for local authorities to implement heat demand reduction and decarbonisation initiatives. Neighbouring local authorities could perhaps work in partnership in order to share expertise and resources. With respect to district heating regulation, the Council agrees with the principles to reduce heat demand and provide a low carbon affordable heat supply. District heating will require a large degree of investigation in terms of its suitability for certain areas with planning policy and legislation and feasibility studies playing an important role. It will also require engagement with building owners and possibly a level of compulsion for them to subscribe to a district heating network. The Council agrees with the proposal for licensing of district heating and that this should achieve parity with existing utilities in terms of protection for both consumers and suppliers.

Onshore Wind Policy Statement

- 5.8 The Scottish Government has reaffirmed its existing onshore wind policy and seeks views on how onshore wind can best be supported. The current policy is to support deployment of onshore wind while protecting the landscape and visual, ecological and other environmental impacts. Moreover, the Scottish Government wishes to maximise local benefits from onshore wind such as shared ownership and community benefits. The consultation covers a range of issues such as route to market, 'repowering' of existing wind farm sites, barriers to deployment and developing a strategic approach to new development.
- 5.9 The Council response to this consultation is set out in Appendix 4. The response views wind farm efficiency in terms of maximising electricity output from wind turbines, siting and addressing energy storage as important elements for route to market. Notably this should help the industry become independent without the need for government subsidy. The Council agrees with repowering since it makes sense to use existing sites but developments should still be assessed on their merits and consideration given to the environment and local benefits. The response queries how the Scottish Government's proposal for a local coordinated approach to new wind farm development would work. In terms of impacts of wind farms on civil aviation operations, the response agrees that radar data from civil aviation should be used but queries how this would work. The Council has set out a spatial framework identifying the most likely appropriate areas for wind farms in the Renewable Energy Supplementary Guidance document accompanying the Inverclyde Local Development Plan.

Unconventional Oil and Gas

- 5.10 Unconventional oil and gas refers to shale gas and oil and coal bed methane of which Scotland's geology, particularly a stretch of land through the central belt, contains

significant quantities. Accessing these resources would require the use of technologies such as hydraulic fracturing, commonly referred to as 'fracking'. This has proved to be controversial due to the potential health and environmental effects and the compatibility with Scotland's climate change objectives. The Scottish Government had, therefore, placed a moratorium on pursuing unconventional oil and gas requesting more evidence on the process. The consultation seeks views on the evidence given in the consultation document. The Committee has previously noted a report on the planning issued associated with fracking.

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- 5.11 The Council response to this consultation is set out in Appendix 5. The response offers the view that the extraction of unconventional oil and gas should not be pursued. The potential negative impacts to health and the environment outweigh any potential economic benefits. Moreover, the economic benefits are questionable due to the downturn in oil prices in recent years. The use of such a fossil fuel source of energy also contradicts the Scottish Government's climate change objectives to decarbonise the energy supply as stated in the Draft Climate Change Plan and Draft Scottish Energy Strategy. The response offers the view that Scotland should concentrate on the low carbon economy whereby it has the potential to be a leader in the development of zero/low carbon technologies.

6.0 IMPLICATIONS

Finance

- 6.1 There may be financial implications for the Council in terms of developing a Local Heat and Energy Efficiency Strategy. There may also be implications in delivering energy efficiency and decarbonisation of the energy supply requirements stated in Scotland's Energy Efficiency Programme. However, these costs are neither certain nor quantifiable at this time.

Financial implications

One off costs

Cost Centre	Budget Heading	Budget Year	Proposed Spend this Report	Virement From	Other Comments
n/a	n/a	n/a	n/a	n/a	n/a

Annually Recurring Costs/Savings

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From	Other Comments
n/a	n/a	n/a	n/a	n/a	n/a

Legal

- 6.2 There are no direct legal implications arising from this report.

Human Resources

6.3 There are no direct human resource implications arising from this report.

Equalities

6.4 There are no direct equalities implications arising from this report.

Repopulation

6.5 There are no direct repopulation implications arising from this report.

7.0 CONSULTATIONS

7.1 None.

7.2 **Chief Financial Officer:** no requirement to comment.

7.3 **Head of Legal and Democratic Services:** no requirement to comment.

7.4 **Head of Organisational Development, HR and Communications:** no requirement to comment.

8.0 BACKGROUND PAPERS

The consultation documents can be viewed on the Scottish Government web site as follows:

Draft Scottish Energy Strategy - <http://www.gov.scot/Resource/0051/00513248.pdf>

Scotland's Energy Efficiency Programme - <http://www.gov.scot/Resource/0051/00513248.pdf>

Local Heat and Energy Efficiency Strategies (LHEES) and Regulation of District Heating - <http://www.gov.scot/Resource/0051/00513244.pdf>

Onshore Wind Policy Statement - <http://www.gov.scot/Resource/0051/00513263.pdf>

Unconventional Oil and Gas - <http://www.gov.scot/Resource/0051/00513575.pdf>

APPENDICES

Appendix 1 - Inverclyde Council response to Scottish Government's Draft Scottish Energy Strategy

Appendix 2 - Inverclyde Council's response to Scotland's Energy Efficiency Programme

Appendix 3 - Inverclyde Council response to consultation on Local Heat & Energy Efficiency Strategies, and Regulation of District Heating

Appendix 4 - Inverclyde Council response to Scottish Government Onshore Wind Policy Statement

Appendix 5 - Inverclyde Council response to Scottish Government Unconventional Oil and Gas consultation

Inverclyde Council response to Scottish Government's Draft Scottish Energy Strategy

1. What are your views on the priorities presented in Chapter 3 for energy supply over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.

Inverclyde Council on the whole agrees with the priorities but in order to meet climate change targets it may be necessary for the vision to set out a higher target than 50% of energy delivered by renewables. Oil and gas should only be used as an interim until non/low carbon emitting fuels are developed sufficiently to meet energy demand. The North Sea oil industry can still be supported following this but for uses other than fuel provision. It has been argued for decades that burning oil for fuel is a waste of a valuable and depleting resource.

The focus should be on a combination of energy demand reduction and renewables/low carbon energy generation with which to mitigate climate change. For unavoidable carbon emissions from energy generation, carbon capture and storage and CO₂ utilisation can be deployed. There is potential to use CO₂ for the manufacture of products as demonstrated by the Tuticorin plant in India (<http://www.bbc.co.uk/news/business-38391034>).

2. What are your views on the actions for Scottish Government set out in Chapter 3 regarding energy supply? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.

The view of Inverclyde Council is that the actions listed are very comprehensive in attempting to establish an energy supply that minimises carbon emissions. The Council particularly agrees with having a flexible approach since no one technology will be able to meet entire energy demand. Moreover, a holistic approach should be taken to the supply of energy in which technologies are assessed in terms of potential ecological and social impact. The Scottish Government should consult with relevant organisations and groups in this regard, e.g. RSPB Scotland on impact of wind turbines on bird life. The development of a low carbon energy supply should not be detrimental to jobs and the economy. The Council, therefore, agrees with the aims to retrain those working in the fossil fuels energy sectors to work in the low carbon energy sector. Moreover, support should be given to academia, for apprenticeships and other relevant areas so that low carbon energy continues to be a source of employment and of benefit to the economy.

3. What are your views on the proposed target to supply the equivalent of 50% of all Scotland's energy consumption from renewable sources by 2030? In answering, please consider the ambition and feasibility of such a target.

The view of Inverclyde Council is that greater ambition may be required in this regard in order to meet climate change objectives. A combination of reduced energy demand and appropriate deployment of renewable energy technologies could improve on this target. To mitigate the potential impacts of climate change will require a complete change in how energy is used and supplied.

4. What are your views on the development of an appropriate target to encourage the full range of low and zero carbon energy technologies?

Inverclyde Council holds the view that an ambitious target for low and zero carbon technologies in general is important for placing an impetus in their development and deployment. There should not, however, be targets for any particular technology since they are site specific and would want to ensure the correct technology for an area is deployed. An appropriate mix of low and zero carbon technologies will be required to meet energy demand. Policymakers have set ambitious targets for carbon reduction in the past which have been exceeded, so that continued level of ambition is required to mitigate climate change.

5. What ideas do you have about how the onshore wind industry can achieve the viable commercial development of **onshore wind** in Scotland without subsidy?

Please see response to Onshore Wind Policy Statement consultation.

6. What are your views on the potential future of Scotland's decommissioned thermal generation sites?

Inverclyde Council enquires if these could be utilised for future low/zero carbon energy generation technologies, e.g. hydrogen, biomass, district heating, etc.

7. What ideas do you have about the role of hydrogen in Scotland's energy mix and the development of hydrogen production in Scotland?

Inverclyde Council holds the view that hydrogen could play a major role in Scotland's future energy mix. Existing gas infrastructure and technical expertise in the oil and gas industry could be utilised to support the development of hydrogen as a low carbon fuel source. Hydrogen fuel cells have the potential to support low emissions transport if sufficient compression of the gas can be achieved. Inverclyde Council advises the Scottish Government to work closely with the long established Scottish and Hydrogen Fuel Cell Association in this regard. Zero carbon electrolysis can be achieved using wind power in areas with a large wind resource. The hydrogen can subsequently be stored and transported to where it is needed. Using methane as a feedstock can provide the double gain of taking such a potent greenhouse gas out of the atmosphere and transforming it into a useful energy source. Methane from landfill sites accounts for a significant proportion of greenhouse gases so Inverclyde Council encourages exploration in using this for the production of hydrogen.

8. What are your views on the priorities presented in Chapter 4 for transforming energy use over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.

Inverclyde Council agrees with the priorities. Demand reduction is an essential component in meeting climate change objectives. Reducing emissions from transport is also key and active travel should play a major role in this due to be combined benefits of being zero carbon and good for overall health.

9. What are your views on the actions for Scottish Government set out in Chapter 4 regarding transforming energy use? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.

Inverclyde Council agrees with the actions. The actions are certainly necessary to achieve the vision but the Scottish Government may need to go further. Particular challenges lie with improving the energy performance of owner occupier properties and older building stock and transforming road transport. Also, aviation is not mentioned which has significant implications for climate change. The Scottish Government should support low carbon

alternatives to aviation and could provide leadership on seeking technological solutions to emissions generated from air travel.

10. What ideas do you have about what energy efficiency target we should set for Scotland, and how it should be measured? In answering, please consider the EU ambition to implement an energy efficiency target of 30% by 2030 across the EU.

Inverclyde Council's view is that the Scottish Government should, at the least, adopt the 30% by 2030 energy efficiency target proposed by the EU. Moreover, it should consider adopting a higher target of up to 40%. Energy demand reduction is a crucial component in meeting fuel poverty and climate change objectives. A high target will provide impetus to taking action on improving the energy performance of buildings. In terms of the nature of the target, Inverclyde Council holds the view that changes in the intensity of energy use through e.g. weather patterns, economic cycles, etc. should be incorporated but it should not diminish too much responsibility from meeting the target. Measurement can therefore be made of energy consumption versus degree days and other suitable caveats.

11. What are your views on the priorities presented in Chapter 5 for developing smart, local energy systems over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.

Inverclyde Council agrees with the priorities for developing smart local energy systems. A strategic approach is necessary and should involve all stakeholders. Support for innovation through the academic and commercial sectors is also important.

12. What are your views on the actions for Scottish Government set out in Chapter 5 regarding smart, local energy systems? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.

Inverclyde Council agrees with the priorities. Innovation is key to the development of smart, local energy systems so academia and others must be supported in this regard. A strategic approach involving all stakeholders is also necessary.

13. What are your views on the actions for Scottish Government set out in Chapter 5 regarding smart, local energy systems? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.

Inverclyde Council agrees with the actions, particularly with regards supporting community and local renewable energy schemes.

14. What are your views on the idea of a Government-owned energy company to support the development of local energy? In answering, please consider how a Government-owned company could address specific market failure or add value.

Inverclyde Council agrees with the development of a Government Owned Energy Company (GOEC) to support local renewable energy. This can assist in the financing of innovative projects in which market success is less certain thereby helping such projects get off the ground. A GOEC can further support local renewable for the good of all rather than private investment which requires maximising shareholder value.

15. What are your views on the idea of a Scottish Renewable Energy Bond to allow savers to invest in and support Scotland's renewable energy sector? In answering, please consider the possible roles of both the public and private sectors in such an arrangement.

Inverclyde Council holds the view that a Scottish Renewable Energy Bond can offer secure investment with which to finance energy projects and systems. Inverclyde Council prefers national and local government issue of bonds since energy supply is crucial to any country, thereby should not be too hampered by the requirement to maximise returns on investment for the private sector.

16. What ideas do you have about how Scottish Government, the private sector and the public sector can maximise the benefits of working in partnership to deliver the 2050 vision for energy in Scotland?

Inverclyde Council holds the view that providing greater power to local authorities with regards to energy provision can help with the development of good local energy systems. The Scottish Government should engage the private sector and academia in developing the skills base required to meet future low carbon energy needs and support them in this. Moreover, the Scottish Government should present to the private sector the potential business benefits of a new low carbon energy economy and the new and potential business streams that the private sector can benefit from. Scottish and Local Government should work together in providing the required business infrastructure with which to attract the private sector into the low carbon energy sector.

17. What ideas do you have about how delivery of the Energy Strategy should be monitored?

Inverclyde provides the following ideas on monitoring the delivery of the Energy Strategy:

- *The number of completed low carbon energy projects per annum.*
- *The number of low carbon energy projects in development per annum.*
- *The number of businesses within the low carbon energy sector per annum.*
- *The number of businesses benefitting from the low carbon energy sector per annum.*
- *The number of people employed in the low carbon energy sector per annum.*
- *The number of apprenticeships created in the low carbon energy sector per annum.*
- *The number of academic courses offered in the low carbon energy sector per academic year.*
- *The number of students taking courses in low carbon energy or related subjects such as engineering, science, sustainability and ecology per academic year.*
- *Public engagement polls with regard attitudes to low carbon energy, fuel poverty and climate change.*

18. What are your views on the proposed approach to deepening public engagement set out in this chapter?

Inverclyde Council agrees with the approach to deepening public engagement. Public engagement is essential to the success of the Energy Strategy in meeting energy security and climate change objectives. Awareness in terms of energy use and its impacts and the promotion of energy conservation can help significantly in reducing energy demand.

Inverclyde Council's response to Scotland's Energy Efficiency Programme

1. Thinking about current Government schemes and the delivery landscape, we would welcome stakeholders' views on:

- what currently works well, including aspects of existing schemes that should be retained?
- what are the main delivery challenges faced at present and how might these be overcome?

Inverclyde Council feels the following has worked well:

- *The Home Energy Efficiency Programmes for Scotland - Area Based Schemes has worked well in improving both the energy performance and quality of housing. Area based schemes thus appear to be a good way to tackle energy efficiency and low carbon energy combined.*
- *Resource Efficient Scotland has been helpful in providing advice to the public sector in terms of energy and water conservation and low carbon energy and reduction of waste to landfill. Having such expert advice to provide information and be contactable is very important.*
- *Renewable Heat Incentive has been very important in the implementation of renewable heat. Financial incentives are important in stimulating investment in such technology.*

In terms of delivery challenges Inverclyde Council's view is that due to the need to build properties quickly to reduce costs, developers tend to adopt standard technologies, e.g. mains gas, rather than low carbon solutions. Planning policy and regulation must, therefore, strongly favour both energy efficiency and low carbon energy provision where feasible.

2. How can Scotland best meet this vision (Scotland's buildings are near zero carbon by 2050 and this is achieved in a way that is socially and economically sustainable) and underpinning objectives in a way that is both socially and economically sustainable and supports long-term inclusive growth?

Inverclyde Council's view is that this vision can be met as follows:

- *Changes to Building Regulations to encourage low carbon development in terms of energy efficiency, renewable energy, and low carbon energy provision, e.g. district heating.*
- *Support innovation via support for energy efficiency and low carbon research through e.g. academia, private sector research and development, etc.*
- *Support skills training in energy efficiency and low carbon energy provision, e.g. apprenticeships, training courses for businesses, academic courses, etc.*
- *Provide accreditation process to ensure standards are being met and provide training for this.*
- *Provide investigation and complaints process in case standards have not been met and where redress can be sought.*

3. We would welcome stakeholders' views on how to set appropriate milestones for energy efficiency improvement and heat decarbonisation of buildings to ensure that the level of emissions reduction ambition (i.e. near-zero carbon buildings) is achieved.

Inverclyde Council hold the following views:

- *Prioritise by area in terms of the amount of carbon emissions being generated, e.g. focus initially on dense urban areas or industrial areas in which carbon emissions are likely to be highest.*
- *Milestones could be the number of buildings per area in which energy efficiency and zero/low carbon energy provision has been applied – what reductions in carbon emissions have been achieved? Need to collate good data on current energy consumption.*

4. How might regulation and standards be used most effectively across the different sectors and when should they be applied across the lifetime of the programme?

5. What should be the trigger points for buildings to meet standards? Should this differ between domestic and non-domestic buildings, and if so, how?

Inverclyde Council holds the view that energy efficiency standards and implementation of low carbon energy solutions where feasible should be incorporated within regulations and legislation and cover all buildings. Owners of buildings should subsequently be given support to implement required changes. A combination of legislation and support will likely give best chance of required changes being achieved.

6. What do you think are the benefits of using financial and fiscal incentives to support energy efficiency in domestic and non-domestic buildings? Please give examples, from Scotland or elsewhere, of where incentives have been used in this way to good effect.

Inverclyde Council holds the view that financial incentives and disincentives are likely to encourage action on reducing energy demand and decarbonisation. Examples are as follows:

- *Disincentives – Taxes on carbon and energy or high energy prices, e.g. Climate Change Levy, Carbon Reduction Commitment Energy Efficiency Scheme, increase in unit prices of electricity and gas.*
- *Incentives – Renewable Heat Incentive and Feed-In Tariffs have stimulated growth in renewable electricity and heat generation.*

7. What is the best approach to assessing energy efficiency and heat decarbonisation improvements to buildings? How could existing approaches best be used or improved and at what level and scale (e.g. unit, building or area) should assessment be carried out?

Inverclyde Council holds the view that probably the current best approach is energy use per area. Ultimately, however, every building should be assessed individually with the aim of fully decarbonising through reducing energy demand and zero/low carbon energy generation. Prioritise action on buildings in terms of highest to lowest carbon emissions.

8. How should the installation of energy efficiency improvements and lower carbon heat supply through Scotland's Energy Efficiency Programme be funded? In particular, where should the balance lie between grant funding and loans for homeowners, landlords and businesses?

Inverclyde Council holds the view that it should be through a combination of grants and interest-free loans.

9. What is needed to encourage private investment in energy efficiency and heat decarbonisation, including the take-up of loans by a wider range of owners and occupiers?

Inverclyde holds the view that financial incentives and disincentives could help.

10. Of the current sources of finance which are currently available for energy efficiency and lower carbon heat supply, which are working well and which are not? Are there successful examples of attracting private sector finance to support energy efficiency improvements that could be explored? Are there any others which should be developed or made available?

Inverclyde Council holds the following views:

- *Working well – Renewable Heat Incentive, Feed-In Tariffs, Resource Efficient Scotland interest free loans, SALIX interest free loans and revolving fund, Home Energy Efficiency Programme for Scotland Area Based Schemes.*
- *Not working well – Schemes that ask for share in savings.*

11. How do we ensure that householders and owners are well advised and supported in making decisions on how to improve the energy efficiency of their building and install lower carbon heat supply through Scotland's Energy Efficiency Programme?

Inverclyde Council holds the view that the number of accredited advisers should be increased. Training of energy advisers is required and organisations providing advice should be accredited in some way.

12. Are the current mechanisms for providing advice sufficient? What changes, if any, do you think are required?

Inverclyde Council's view is that current mechanisms are good but require expansion for the level of work required with suitable training and accreditation provided.

13. What are the opportunities to link Scotland's Energy Efficiency Programme delivery with other initiatives, including the UK Government's smart meter rollout, so that we maximise the benefits for the people of Scotland?

Inverclyde Council holds the view that smart meter data should be used to inform advice given to domestic-sector in terms of energy efficiency and conservation. Smart meter data should be used to inform potential for district heating and other zero/low carbon technologies.

14. How can Scotland's Energy Efficiency Programme be designed and promoted to build consumer confidence (as a trusted 'brand')? What are the risks and opportunities associated with particular approaches?

Inverclyde Council holds the view that Scotland's Energy Efficiency Programme can ensure confidence by having suitable accreditation and training, and processes for redress should things go wrong. Risks are that accreditation becomes a tick-box exercise, training is not properly monitored to ensure staff have relevant, sufficient skills, and that redress processes are too lengthy and bureaucratic. Opportunities are having motivated and knowledgeable staff that can provide quality services and have quick and effective response to incidents where things have gone wrong and resolutions can be found quickly.

15. Is there a tried and trusted form of consumer redress that should be adopted or, if not, what should such a mechanism look like?

Inverclyde suggests OFGEM – could it design something specifically for Scotland’s Energy Efficiency Programme. There is also the newly established HEAT Trust for district heating.

16. How should Scotland’s Energy Efficiency Programme look to integrate the findings of the Each Home Counts Review – e.g. could it be used a basis for developing a consumer protection framework for Scotland’s Energy Efficiency Programme?

Inverclyde Councils holds the view that Scotland’s Energy Efficiency Programme should incorporate the findings of Each Home Counts Review to develop a consumer protection framework for Scotland’s Energy Efficiency Programme.

17. How can local supply chains be expanded and up-skilled to ensure that maximum economic benefit and job creation is secured across all of Scotland?

Inverclyde Council holds the view that training is essential.

18. How can communities best benefit from the expected job creation?

Inverclyde Council holds the view that there should be promotion of training and jobs locally. School leavers could be targeted along with the unemployed in a particular area. Local authorities could assist.

19. What provision could be made at a national level to ensure companies increase the capacity of the supply chain across all of Scotland to support local delivery of Scotland’s Energy Efficiency Programme, particularly in the rural and remote areas?

Inverclyde Council holds the view that the following provisions could be made:

- *Legislation and regulation, e.g. Buildings Regulations*
- *Ensure companies are paid within a reasonable time-frame, e.g. 28 days*
- *Put in place procurement frameworks and procedures to incorporate clauses that favour local businesses where possible.*
- *Training provided to locals in rural and remote areas.*

20. What do companies need to do to increase their skills base to deliver a programme of this nature?

Inverclyde Council holds the following views:

- *Companies must invest in training but to encourage such investment there must be good potential if not guarantees of work.*
- *Companies could seek out graduates in colleges and universities that have taken relevant courses.*
- *Companies should employ staff with appropriate skills.*

21. What roles should national and local bodies play respectively in delivering Scotland’s Energy Efficiency Programme and how can national and local schemes best be designed to work together towards meeting the Programme’s objectives?

Inverclyde Council holds the following views:

- *National bodies – Legislation, regulation, vision, guidance, promotion, procurement frameworks*
- *Local bodies – Delivery, procurement of contractors, local areas to target, Planning.*

22. What are your views on the relative benefits of area-based schemes as against those targeted at particular sectors or tenures in delivering Scotland's Energy Efficiency Programme? What other targeting approaches might be effective?

Inverclyde Council holds the following views:

- *Area Based Schemes - very effective and can incorporate several types of property. Good for district heating and potential for use of waste heat from nearby resources, e.g. industrial plant.*
- *Targeting approaches – could target certain industries that produce waste heat or offer appropriate solutions.*

23. How best can we align nationally set standards with local, area-based delivery?

Inverclyde Council holds the view that there should be a degree of flexibility to account for local issues and priorities, topography, services, etc.

24. What should the overall balance be between national and local target setting? Should local authorities set local targets with the flexibility to determine whatever methods they want to meet the Programme vision? Or should there be a greater degree of setting the target(s) and delivery methods by national government?

Inverclyde Council agrees with the national target and that local authorities should set local targets to help achieve national target. Local authorities should have flexibility to implement measures suitable to their area.

25. What would a good governance structure to oversee any framework of responsibilities between national and local government look like? What examples are you aware of within the UK or elsewhere?

Inverclyde Council holds the view that a governance structure similar to Education is suitable, whereby, national government sets overall vision and national targets but local government given power and freedom to implement measures in a way suitable to their area.

26. What should be included in a monitoring framework to ensure that the Programme is effectively monitored and evaluated?

Inverclyde Council holds the view that a monitoring framework should include the following:

- *Type of energy efficiency measures implemented.*
- *Type of zero/low carbon measures implemented.*
- *Number of properties with energy efficiency and zero/low carbon measures implemented.*
- *Types of property with energy efficiency and zero/low carbon measures implemented.*
- *Energy consumption data on properties with energy efficiency and zero/low carbon measures implemented.*

- *Carbon emissions data on properties with energy efficiency and zero/low carbon measures implemented.*
- *Number of complaints of measures not being implemented properly.*
- *Maintenance contracts established for zero/low carbon technologies.*

Inverclyde Council response to consultation on Local Heat & Energy Efficiency Strategies, and Regulation of District Heating

Q1. Do you agree that local authorities should have a duty to produce and implement a Local Heat & Energy Efficiency Strategy? Please explain your view.

Inverclyde Council agrees as it would provide local authorities with an impetus to implement heat demand reduction and heat decarbonisation initiatives such as district heating.

Q1b. What are your views on the appropriate geographical scale for the preparation of Local Heat & Energy Efficiency Strategies? Should each local authority produce a single strategy for its area, or would it be possible for local authorities to work together to prepare strategies jointly for a wider area?

Inverclyde Council's view is that it should be flexible in that local authorities can partner with neighbouring authorities in producing and implementing Local Heat & Energy Efficiency Strategies. This would assist in terms of resource for those local authorities that do not have many staff working in this area.

Q2. Do you agree with the proposed scope and content for Local Heat & Energy Efficiency Strategies? In particular do you agree Local Heat & Energy Efficiency Strategies should (a) set targets for energy efficiency and decarbonisation and (b) include a costed, phased delivery programme that will meet local targets? Please explain your views.

Inverclyde Council agrees that the programme should have a long-term focus with the aim to reduce heat demand and decarbonise heating supply in order to meet the objectives stated in the Draft Climate Change Plan. Inverclyde Council agrees that Local Heat & Energy Efficiency Strategies should set targets for energy efficiency and decarbonisation but these should not be overly punitive and take into account the resources and particular issues/priorities of individual Local authorities. Inverclyde Council agrees that Local Heat & Energy Efficiency Strategies should include a costed, phased delivery programme to meet local targets as this will allow sufficient management of heat demand reduction and decarbonisation projects.

Q3. Please provide any evidence you have regarding the data available (or that could be available) to local authorities that would be useful or key to preparing and implementing such plans beyond the Scotland Heat Map and the EPC Register (including data held both within and outwith the public sector).

- *Inverclyde Council could provide the following evidence:*
- *Heat demand of its corporate estate.*
- *Heat demand of Inverclyde residents.*
- *Heat demand of other non-domestic buildings in Inverclyde, e.g. Leisure, NHS, commercial, etc.*
- *Population of Inverclyde.*
- *Topography of Inverclyde.*
- *Existing infrastructure of Inverclyde, e.g. road and rail networks, etc.*

Q4. What are your views on the broad principles for regulation outlined above? What else do we need to consider? What should be prioritised in cases where principles may not always be compatible?

Inverclyde Council agrees with the stated principles. The principles are comprehensive and Inverclyde Council cannot think of anything further. Priority should be given to reducing overall heat demand, decarbonising overall heat supply and meeting fuel poverty objectives by ensuring district heating supplied is affordable.

Q5. What are the key principles or approaches that should inform how our regulatory approach manages risk for district heating across the whole system?

Inverclyde Council's view is that the overriding principles should be to reduce heat demand and decarbonise heat supply to meet climate change objectives. Moreover, the ecological footprints of district heating projects must be considered. In this regard good feasibility studies should be undertaken that consider these in the first instance. Potential customers of district heating supply should be adequately informed that the reason for proposing district heating is to meet climate change objectives. The subsequent approach to managing risk is to ensure good technical feasibility studies are undertaken that cover design, construction and operation of the district heating network and systems. A particular focus should be placed on operation concerning the maintenance of systems. There should be a sufficient and suitable skills base with which to maintain district heating systems should problems occur when they are in operation.

Q6. What are your views on local authorities having the power through Local Heat & Energy Efficiency Strategies to zone areas for district heating? Please provide any relevant evidence.

Inverclyde Council's view is that Local authorities having the power to zone areas for district heating through Local Heat & Energy Efficiency Strategies will allow the development of small district heating networks that can subsequently link to other such networks. It can further force developers to implement district heating in new developments and redevelopments. Note, however, that such powers should be used sensitively involving discussions with customers, developers and other stakeholders. It should be carefully explained that the reason for designating an area as a 'district heating zone' is to help meet climate change objectives.

Q7. How should district heating zones be identified? For example, how should national targets, socioeconomic analysis, local priorities feed in to the designation of zones within the strategy?

Inverclyde Council's view is district heating zones should be identified on their potential to maximise reduction in greenhouse gas emissions. They may, therefore, be most suitable in areas of high heat demand, such as dense urban areas. Further consideration should be given to areas of fuel poverty that may benefit from a district heating network.

Q8. What are your views on taking district heating zones, or parts of district heating zones, and establishing an exclusive concession for either private- or public-sector heat network developers to fulfil that part of the Local Heat & Energy Efficiency Strategies? How will this alter the risk profile of district heating development?

Inverclyde Council is not sure about making concessions exclusive as this may limit choice of district heating developer. Any concession or award of any district heating development should include conditions on heat decarbonisation and alleviation of fuel poverty and that the district heating system should meet the technical requirements for operation with sufficient maintenance in place.

Q8b. Do you agree that local authorities should be responsible for issuing and enforcing concessions in their areas? Please explain your answer.

Inverclyde Council is not sure Local authorities should be entirely responsible for issuing and enforcing concessions as there could be issues of locality, expertise and resource. Local authorities should have a level of influence but should operate within a national framework that focuses on meeting climate change objectives and alleviating fuel poverty.

Q9. What considerations should inform the design of concessions (target users, envisaged network growth, concession length, etc.)? Please provide any evidence you have to support your views.

Inverclyde Council's view is that potential to maximise greenhouse gas reduction and alleviate fuel poverty should inform design of concessions.

Q10. What are the implications of zoning and concessions for existing district heating networks?

Inverclyde Council's view is that the implications are the potential to link to new district heating networks.

Q11. Do you think the broad rights and responsibilities of concession holders set out in this document are appropriate? Why? Please provide any examples or evidence.

Inverclyde Council's view is that they are appropriate. The development of district heating networks should be underpinned by the requirement to have a low carbon, affordable heat supply. This will help meet the objectives of mitigating climate change and alleviating fuel poverty.

Q12. How can a balance be struck between ensuring Local Heat & Energy Efficiency Strategies are responsive to changing conditions while ensuring security and stability in long-term district heating development models?

Inverclyde Council's view is that a long-term view of low carbon/decarbonised heating supply should be taken and district heating does provide flexibility in the source of heat used. To avoid stranded assets, district heating networks should be located in areas that can maximise greenhouse gas reduction and can relatively easily be incorporated in existing infrastructure. An example is in dense urban areas.

Q13. What should happen to long-term ownership of heat network assets, post-concession?

Inverclyde Council's view is that post concession, district heating networks should be publicly owned or at least be owned by company which has a good level of Government involvement and subject to strict Government regulation, e.g. Scottish Water. This will help ensure the objectives to mitigate climate change are met and that appropriate investment is made in maintaining and improving district heating infrastructure.

Q14. What are your views on the opportunities and challenges in connecting anchor loads to new heat networks? In your view, will the scenario set out address these issues and accelerate district heating development? Please explain your answer.

Inverclyde Council's view on the opportunities are that it will provide stability to the heat network thereby making it viable for other buildings to connect. The challenges are the

potential disruption to an anchor load building's existing heating supply and the cost differential from connecting compared that of the building's existing supplier. The challenges are, however, accounted for in the scenario through the socio-economic cost effectiveness test, business case, suitable time-frame and requirement of no detrimental effect to building occupiers.

Q15. What are your views on the proposed power to compel existing buildings to connect to district heating?

Inverclyde Council agrees as this is the best, if not only, way to implement district heating as a low carbon/decarbonised heating supply. Mains gas heating is the current standard with existing infrastructure, industry knowledge and expertise and is reasonably cheap. To move away from this to district heating will most likely require a reasonably large degree of compulsion. This, however, should be handled sensitively explaining effectively the reasons for making this change and giving building owners, occupiers, developers and other stakeholders information, support and time to adjust and make the required changes.

Q15b. Are the broad principles and criteria appropriate? Should other principles or criteria also apply? In particular, what approach should be taken to socio-economic assessment at the project level, prior to a compulsion to connect?

Inverclyde Council's view is that they are appropriate. Ultimately the requirement is to mitigate climate change while alleviating fuel poverty so decarbonising the heat supply while making the heat generated affordable to consumers. Information should be gathered on costs incurred from existing heating supplies to determine if installation of a district heating system would increase these costs. Note, the unit price of the heat may increase but lower heat demand through improved efficiencies may result in the same if not lower heating costs than the previous supply. Focus should also be on the quality of heat output to ensure comfort in the buildings.

Q15c. Do you agree that this socio-economic assessment at project level should include an assessment of the impacts on consumers of requirements to connect?

Inverclyde Council agrees. Consumer support for district heating is essential in ensuring its implementation. Such support is highly unlikely if heating costs significantly increase as a result of installing a district heating network.

Q15d. Do you agree that local authorities should exercise powers to compel connection of existing buildings (for example when requested by relevant concession holders)? Please explain your answers.

Inverclyde Council agrees, as a certain level of compulsion is likely to be required for the successful take up of district heating. This, however, should be handled sensitively with discussions held and explanations given to building owners and occupiers. Moreover, powers should only be exercised when district heating is feasible.

Q16. Do you agree that mitigating risk by establishing exclusive concessions will lower financing costs and heat prices?

Inverclyde Council is not sure with regards having exclusive concessions.

Q16b. How can these regulations be designed to best ensure this happens?

Inverclyde Council is not sure with regards having exclusive concessions.

Q16c. What are your views on the time length of concessions in order to attract investment?

Inverclyde Council's view is that if exclusive concessions are to be awarded, the time length would have to be significant due to the infrastructure involved. Inverclyde Council envisages agreement to have a time length of decades.

Q17. Do you agree that compelling existing buildings to connect to district heating would mitigate heat demand risk, lower financing costs and help create an attractive investment proposition for district heating developers and financial institutions?

Inverclyde Council agrees as it would generate a customer base with which to lower risk and encourage investment.

Q17b. Could you provide evidence of how much they would be lowered?

Q17c. How can these regulations be designed to best ensure this happens?

Inverclyde Council's view is that the regulations could be designed in such a way that places an emphasis on feasibility, ensuring heat supplied is not more expensive than what the buildings would otherwise pay and with the standpoint of meeting climate change objectives.

Q18. What are your views on the relationship between Local Heat & Energy Efficiency Strategies and local development plans and how planning policy and development management should support the anticipated role of Local Heat & Energy Efficiency Strategies for new buildings?

Inverclyde Council's view is that Local Heat & Energy Efficiency Strategies should be incorporated in Local Development Plans to compel implementation of district heating for new development where feasible. Planning policy and development management should adopt policies that favour district heating in planning applications. Note that ecological considerations must also be included in the decision making process.

Q19. What challenges and opportunities do you see for existing industrial plant to connect and sell waste heat to nearby district heat networks, both now and in the future?

Inverclyde Council sees the challenges being the technical and cost implications for the organisation that owns the industrial plant to connect to a district heating network. Inverclyde Council sees the opportunities being the new revenue stream for the organisation in selling waste heat to the district heating network. How would the cost of the heat be determined and would it be index-linked?; issues of negotiating a fair price for the heat.

Q19b. What barriers have industries experienced in the ability to sell their heat under current market conditions?

Inverclyde Council's view is that currently district heating infrastructure is not there and gas or electric heating is the current standard and is likely to be cheaper than district heating.

Q20. What are your views on requiring existing industrial plant, with the potential to supply surplus heat, to make data available to public authorities? Please provide any relevant evidence.

Inverclyde Council agrees that they should provide this but not sure if this should be enforced or at least enforcement should be a local authority's last resort. Discussions should be held with owners of industrial plant informing them of the potential opportunities and benefits they can derive from providing waste heat to encourage them to provide good, reliable data.

Q21. Under these proposed new arrangements, do you think that an enabling approach, perhaps using voluntary mediation, will be successful? How can we best encourage existing industrial plant to supply waste heat to a district heating network?

Inverclyde Council thinks an enabling approach has a better chance of getting owners of industrial plant on side in terms of the objectives to alleviate fuel poverty and mitigate climate change. Informing industrial plant owners of the potential benefits to their organisation, that the organisation can use it to promote that they are acting in a socially and environmentally responsible manner and offering support in terms of connection.

Q21b. Which public authority should carry out the role of voluntary mediation?

Inverclyde Council's view is that this should be done by Local authorities as they are likely to have already formed a relationship with the organisation and have local knowledge.

Q22. Do you agree that in some circumstances (if requested), compulsory mediation is needed?

Inverclyde Council agrees, in the case of an owner of an industrial plant refusing to engage or being unreasonable in terms of their demands with regards supplying waste heat to a district heating network.

Q22b. Do you agree that if compulsory mediation was not successful, then a more directive approach should be used?

Inverclyde Council agrees (as Q22 above).

Q22c. Which public authority should carry out the role of compulsory mediation or direction?

Inverclyde Council's view is that this role should be carried out by the local authorities in conjunction with the Scottish Government.

Q23. What are your views on requiring new industrial plant to be 'district heating-ready'?

Inverclyde Council agrees since these and any new developments should be prepared for the changes to heating supply infrastructure required to meet climate change objectives at the very early stages.

Q24. What would be the most appropriate way of ensuring that new industrial buildings connect to district heating networks? What role can zoning within local heat & energy efficiency strategies play in this?

Inverclyde Council's view is that the most appropriate way would be through legislation and regulation, e.g. building regulations and planning. It is also important to engage with the industrial sector and plant owners. This could include providing support at the planning stages in terms of the technical aspects of being 'district heating ready', cost information on connection with possible financial incentives and providing tariff information so owners of

industrial plant can calculate potential revenue from connection with a degree of accuracy. Zoning within Local Heat & Energy Efficiency Strategies can help establish district heating infrastructure and determine the customer base in the area containing the industrial plant.

Q25. Do you agree that as district heating becomes more widespread it will need to become a licensed activity? Please explain your answer.

Inverclyde Council agrees as in order to give suppliers and customers confidence through having guaranteed protections. Inverclyde Council's view is that district heating must achieve parity, in terms of legal protections, with electricity and gas for the step change to district heating to be successful.

Q26. What technical standards and consumer protection measures should be part of standard district heating licence conditions? How should these relate to existing schemes?

Inverclyde Council's view is that they should be on a par with that of current electricity and gas supply. Such standards should be applied to existing schemes.

Q27. What are your views on using a licensing system to confer enabling powers on operators, and on what enabling powers are required?

Inverclyde Council agrees with the proposition to use a licensing system. Inverclyde Council's view is that enabling powers should be to install and maintain district heating system and meter and bill customers.

Q28. What principles, objectives and other considerations should guide the development of a Scottish district heating licence?

Inverclyde Council's view is that the principles should be ensuring sufficient technical operation and maintenance of district heating system to ensure adequate heat is being supplied to customers, accurate metering and billing, affordable heat to alleviate fuel poverty and minimising greenhouse gas emissions.

Q29. What drawbacks or challenges might a licensing system create? How could these be minimised?

Inverclyde Council's view is that licenses with terms and conditions must be written to ensure they offer suitable protection and meet the principles above. Expert legal advice and scrutiny is essential.

Q30. Do you have views on who should issue District Heating Licenses and ensure that technical standards are being met?

Inverclyde Council's view is that it should possibly be OFGEM as they have appropriate gravitas, expertise and experience.

Q31. Would the benefits of the concession area outweigh the costs of the licensing arrangements?

Inverclyde Council is not sure. Regardless, if district heating is to become wide spread then it must have the same protections as that for current electricity and gas.

Q32. What are your views on the best approach to ensuring that potential customers understand the differences as potential customers of a heat network, and who do you think is best placed to convey these messages?

Inverclyde Council's view is that the best approach is face to face explanation to potential customers, e.g. door knocking, holding public meetings/seminars, surgeries, etc. User friendly leaflets could also be used. Probably local authorities would be best placed to convey these messages, although use could also be made of Home Energy Scotland and Resource Efficient Scotland.

Q33. Please provide any evidence you have regarding:

- a) analytical skills, resources and techniques that could support development of Local Heat & Energy Efficiency Strategies, particularly where these are not currently used by local government
- b) the anticipated cost of preparing Local Heat & Energy Efficiency Strategies
- c) the additional skills and resources are needed to meet the requirements of the potential local authority role of district heating regulation.

N/A. Have no evidence.

Q34. What support and resources will local authorities need to produce Local Heat & Energy Efficiency Strategies and implement the potential local authority role of district heating regulation, and which organisations do you think these are best placed to provide these? Please explain your views.

Inverclyde Council's view is that technical guidance via literature and workshops by appropriate organisations such as Heat Network Partnership for Scotland, Resource Efficient Scotland and SEPA should be provided.

Q35. What are your views on how any support should change over the different phases of development, introduction and implementation of any regulation?

Inverclyde Council's views are that support provided should reflect current requirements, a step-by-step approach is probably best as many Local authorities are likely to need a lot of guidance and assistance in devising Local Heat & Energy Efficiency Strategies and implementing district heating.

Q36. What are your views on the wider regulation of the heat market to ensure decarbonisation?

Inverclyde Council enquires if existing gas infrastructure can be used for district heating?

Q37. What are your views on when decisions should be taken on the future of the gas network?

Inverclyde Council's view is that decisions should be taken as soon as possible due to the need to decarbonise the heating supply in order to meet climate change objectives.

Inverclyde Council response to Scottish Government Onshore Wind Policy Statement

Route to Market

Q2.1 What is your view on the appropriate approach for the inclusion of wind farm efficiency as a material consideration in the Section 36 consents guidance?

The Council is supportive of wind farm efficiency being a material consideration in the determination of Section 36 applications.

Q2.2 In this chapter, the Scottish Government has identified three areas of activity where it can offer support to a route to market for onshore wind – do you agree with the issues identified?

Yes

Q2.3 How can the Scottish Government, with the powers available to it, further facilitate a route to market for onshore wind?

Investigate the ways in which planning can assist in addressing the issue of energy storage to mitigate the intermittency of wind energy supply.

Repowering

Q3.1 Do you agree with the Scottish Government's proposed approach to repowering?

Yes, provided the 'in perpetuity' locations do not prevent repowering applications being assessed on their merits with the landscape capacity for different scales of wind energy developments and sizes of wind turbines being taken into account to ensure the environmental impact is not increased.

It makes sense to use existing sites with established infrastructure and grid connections rather than create new ones and to try and promote local involvement with community shared ownership on sites where this opportunity was previously missed..

Developing a Strategic Approach to New Development

Q4.1 Do you agree or disagree with the proposals to pursue option 3, a 'locally co-ordinated approach'? Please provide reasons to support your answer.

Q4.2 Do you agree or disagree with continuation of the Scottish Government's 'business as usual' approach (option 4)? Please provide reasons to support your answer.

It would seem sensible that both approaches are used. If option 4 is working well it should be maintained, but a requirement for adjoining schemes to co-ordinate if the timing is right for this should also be an option.

Barriers to Deployment

Q5.1 Do you agree with the Scottish Government proposal to facilitate a strategic approach to the access to, and the cost of using, data from civil aviation radar to mitigate impacts of wind development on civil aviation operations?

Yes

Inverclyde Council response to Scottish Government Unconventional Oil and Gas consultation

Q1: What are your views on the potential social, community and health impacts of an unconventional oil and gas industry in Scotland?

Inverclyde Council holds the view that the potential negative impacts should prohibit the development of unconventional oil and gas in Scotland.

Q2: What are your views on the community benefit schemes that could apply, were an unconventional oil and gas industry to be developed in Scotland?

Inverclyde Council holds the view that any such benefit schemes do not outweigh the potential negative impacts to health and the environment.

Q3: What are your views on the potential impact of unconventional oil and gas industry on Scotland's economy and manufacturing sector?

Inverclyde Council holds the view that the downturn in oil prices indicates unconventional oil and gas will not benefit Scotland's economy in the long-term. Scotland should concentrate on the low carbon economy which is the future and Scotland can potentially be a world leader in zero/low carbon technologies.

Q4: What are your views on the potential role of unconventional oil and gas in Scotland's energy mix?

Inverclyde Council holds the view that with the Draft Climate Change Plan promoting an end to the use of fossil fuel sourced energy that unconventional oil and gas should play no role in Scotland's energy mix.

Q5: What are your views on the potential environmental impacts of an unconventional oil and gas industry in Scotland?

Inverclyde Council holds the view that the potential negative environmental impacts of unconventional oil and gas should prohibit its development.

Q6: What are your views on the potential climate change impacts of unconventional oil and gas industry in Scotland?

Inverclyde Council holds the view that the commitments the Scottish Government has made under the Paris Climate Change Agreement prohibits the development of unconventional oil and gas in Scotland. Promotion of unconventional oil and gas contradicts the objectives stated in the Draft Climate Change Plan.

Q7: What are your views on the regulatory framework that would apply to an unconventional oil and gas industry in Scotland?

Inverclyde Council holds the view that any regulatory framework could not completely negate the potential environment impacts of unconventional oil and gas or be commensurate with the climate change objectives as stated in the Draft Climate Change Plan.

Q8: Overall, and in light of the available evidence, what do you think would be the main benefits, if any, of an unconventional oil and gas industry in Scotland?

Inverclyde Council holds the view that any potential benefits of unconventional oil and gas do not outweigh the potential risks to the environment. Scotland has the potential to lead on the future low carbon economy.

Q9: Overall, and in light of the available evidence, what do you think would be the main risks or challenges, if any, of an unconventional oil and gas industry in Scotland?

Inverclyde Council holds the view that the potential health and environmental risks of unconventional oil and gas in terms of ground and water contamination make it an unattractive source of energy. Moreover, the risks in terms of climate change in adding another fossil-fuel sourced energy supply go against the commitments of the Paris Climate Change Agreement.