

COMMENTS for THE ENERGY REVIEW

1) Policies to Lessen Environmental Impacts of Energy Consumption

These would have to take into account the following information with relevance to Scotland. Some of these points also apply to rural areas elsewhere.

Climate

It is generally much colder in Scotland than in the South of England. Much more fuel is required in order to have homes at comfortable temperatures in Scotland. Energy savings in Scotland are therefore more cost-effective per house, than further south. So it is especially important that the measures offered to Scottish householders are appropriate.

Fuel choice

Mains gas is available only in the urban areas of Scotland. Very large rural areas have no access to mains gas, so consumers are faced with the more expensive fuels and often less controllable heating systems than those available to urban dwellers. The challenges of the climate are compounded by the lack of fuel choice.

Different house construction

Consideration must be given to the different housing types in Scotland. There is a much smaller fraction of houses with cavity wall construction in Scotland, than in England and a much higher fraction of houses with solid walls. There is also a much higher proportion of roofs “in the roof” with sloping ceilings and dormer windows, which cannot be insulated by the standard method of loft insulation.

It is much more expensive to insulate non standard roofs and considerably more expensive to insulate solid walls than cavity walls.

Energy Efficiency Standards of Performance

These standards are rather inflexible as the measures provided generally suit standard property types only. Any regional variation in measures required, is not possible to accommodate. Because of the UK nature of the market for electricity and gas suppliers, it is difficult to see a solution to the needs of all non standard properties, through SOP. SOP will probably provide “more of the same” measures rather than tackle the measures needed most in Scotland.

In Scotland in particular, houses in areas without access to mains gas, tend to be old stone houses which would be very expensive to have wall insulation done. One solution to the problem of houses with solid walls, would be to allow heat-pumps or other renewable generation as relevant measures under SOP.

From March 2002 SOP targets will be more difficult to achieve in Scotland, due to the social housing stipulation. 50 % of grants will have to go to households on

benefit. This will duplicate the work of Warm Deal and will not allow targeting the needs of rural dwellers and the elderly.

Home Energy Conservation Act

This act is not resulting in the high achievements possible, due to the scarcity of full time HECA officers in Scotland. Invariably local authority staff with responsibilities for HECA will also have many other areas of responsibility, so will not have the time to be fully effective regarding the HECA requirements.

Building Regulations

Building Regulations should be more stringent to take account of likely carbon emissions per house. Minimum N.H.E.R. targets should be set for new houses, instead of using the SAP which does not take geographical location and other relevant factors into account.

2) Policies to Improve the Security and Diversity of Energy Supplies

Electricity distribution companies should be given every incentive to maintain the quality of the distribution network, to protect against power failures due to storms or other bad weather.

More electricity should be generated nearer where it is needed. Incentives for farmers to generate their own electricity using wind turbines, should be combined with measures to make it easier for them to sell their surplus electricity to the grid.

Rural dwellers with storage heaters would also benefit if ground source heat pumps were available. These would reduce their electricity requirements.

British grown vegetable oils such as rapeseed should be developed for use in “wet” central heating systems.

Although I am not in favour of electricity generated from waste generally because of the pollutants, it would make sense to utilise unpolluted waste wood in this way. This would be especially effective if combined with district heating schemes.

3) Potentially conflicting policy goals for energy prices

In my experience as an energy adviser for many years, it is extra-ordinarily difficult to motivate most middle income householders to install energy saving measures other than double glazing.

Since deregulation of the energy markets, fuel costs have come down and for householders on average or above incomes, this has undoubtedly been a disincentive to cutting energy use. The cost of domestic fuel is now far too low. The fuel producers and generators should pay a carbon tax according to the carbon content of the fuel. This extra should be passed to the customer.

In order to address the problems of fuel poverty, fuel increases could be combined with the introduction of a fuel allowance to housing benefit or working families tax benefit, in order to reach not just those on benefit but those also on low incomes.

The longterm aim should be greatly increased energy efficiency in the housing stock generally so that the cost of domestic fuel is no longer an issue. Any fuel allowances could be phased out gradually.

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