

Response ID ANON-A42B-F21M-Y

Submitted to **Consultation on a Scottish Energy Strategy: The future of energy in Scotland**
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About You

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Transition Black Isle

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Questions

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.

1What are your views on the priorities presented for meeting our energy supply needs?:

We believe the continuing support of oil and gas extraction is short-sighted, contradicts the promotion of a circular economy, and diverts from the need to switch to other, sustainable, sources of energy. We view the emphasis on Carbon Capture and Storage with some caution, as it is unproven at utility scale, the indicative costs seem very high, and we fear the prospect of CCS could be used as justification for continuing dependence on fossil fuels. Para 107 anticipates that offshore wind will become cost-competitive with gas by 2030; as DONG recently bid for two German offshore wind farms at no subsidy, we believe this is over-pessimistic, and demonstrates that renewables with storage are likely to be a cheaper approach than fossil fuels with CCS.

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.

What are your views on the actions set out which support these priorities?:

We believe the Scottish Government should anticipate the decline in oil and gas extraction, and assist the re-deployment of staff and resources to other industries, whilst promoting and assisting the increasing deployment of renewable technologies. We agree on the importance of hydrogen in replacing fossil fuels for heating, but believe electrolysis from water is likely to be a better approach than using methane as a feedstock, as the latter requires the development of CCS and has serious risks of fugitive emissions.

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.

What are your views on the proposed 2030 target of 50% of Scotland's energy consumption being met by renewable energy?:

Given the success in de-carbonising the electricity supply, we consider this target is unambitious, particularly if coupled with more energetic efforts to reduce energy usage.

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

What steps can be taken to make Scotland the first place in the UK to see commercial development of 'subsidy-free' renewables?:

Scotland is blessed with high levels of wind, wave and tidal energy, and even though our levels of insolation are only moderate, costs of PV continue to fall

rapidly. Furthermore, the Scottish Government has rightly identified the importance of reducing resource use via adoption of a circular economy. We therefore see no benefit in setting targets for energy technologies which rely on finite reserves of fuel.

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

What are your views on the future of thermal generation in Scotland, with a particular focus on repowering Scotland's existing thermal generation sites?:

Finance costs could be reduced if the energy supply sector was in public ownership, and/ or if there was greater clarity about the Government's long-term commitment to on-shore wind.

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

What are your views on the role of hydrogen in Scotland's energy mix and what can government do to support this?:

We have no views on this subject.

7 What ideas do you have about how we can develop the role of hydrogen in Scotland's energy mix?

What are your views on the on the four priority areas for a transformation in energy use?:

We believe more work is needed on the practicalities of storing hydrogen in adequate volumes for it to be a realistic fuel for heating and cooking.

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.

What are your views on the specific actions identified under each priority area?:

We suggest reducing the demand for transport should be an additional priority. Scottish Government policy in this area at present encourages more, not less transport (roads improvement, proposed reduction in APD).

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.

What are your views on how best to reflect the EU ambition to implement a EU wide 30% energy efficiency target to 2030?:

We commend the Scottish Government on the proposed scale of SEEP. However, from the Draft Climate Change Plan we note the ambition to reduce domestic heat demand by 6% through fabric improvements by 2032. We consider this to be far too low a target.

We understand the Scottish Government is committed to implement the requirements of the Energy Performance of Buildings Directive, whether or not Scotland remains part of the EU. As a result, after the end of 2020 all new buildings will need to be "nearly zero energy". We suggest this commitment to improved construction standards should be incorporated into this chapter.

We believe the plans to encourage the switch to ULEVs are unambitious, particularly in view of proposals in Norway and the Netherlands that all new vehicles should be ULEVs by 2025.

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.

10:

We do not have sufficient knowledge of this area to respond.

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.

What are your views on the priorities presented for delivering a smarter local energy system?:

We particularly applaud the priority placed on developing a strategic approach to future energy systems in partnership between communities, the private and public sectors. We note the danger that some communities will be fortunate enough to benefit from substantial energy resources, whereas others will not, and suggest some mechanism is needed to make levels of income to all communities fair.

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.

What are your views on the specific actions identified under each priority area?:

If current trends continue, we see huge potential for communities to combine local electricity generation (particularly PV, which in addition to rapidly falling cost also has the potential to be implemented anywhere in the country) with domestic- or community-scale battery storage. It would be helpful if the Scottish Government could investigate possible models for communities to combine these technologies to form their own local electricity supply businesses.

13 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.

What role do you see for a potential Government owned energy company that would add value to the current landscape supporting the development of local energy?:

We can see advantages to this approach, but do not have sufficient background knowledge to comment in detail.

14 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.

What are your views on the need for a Scottish Renewable Energy Bond, the potential structure, and the role of both the public and private sector in such an arrangement?:

We can see some benefits from this, but given the very low rates at which governments can borrow at present, we think it would be cheaper for the state to take a stronger role in this area.

15 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?

How can Scottish Government maximise the benefit of working in partnership with the public and private sector bodies?:

We think the Scottish Government should develop clear and unambiguous policies supporting a vision for 2050 in which Scotland requires considerably less energy, and energy is delivered exclusively from renewable sources. This approach would be consistent with the plans for a circular economy.

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

Do you have a view on the way in which the Energy Strategy is monitored?:

We support the proposal for an Annual Energy Statement.

17 What are your views on the proposed approach to deepening public engagement set out in Chapter 6?

What are your views on the proposed approach to deepening public engagement under the Energy Strategy?:

We agree with this approach, but note the importance of the public sector acting in ways which are consistent with the Government's strategy.

Strategic Environmental Assessment (SEA) Questions

18 What are your views on the accuracy and scope of the information used to describe of the SEA environmental baseline set out in the Environmental Report? (Please give details of additional relevant sources)

To what extent does the Environmental Report set out an accurate description of the current baseline? (Please give details of additional relevant sources):

We have not considered this.

19 What are your views on the predicted environmental effects as set out in the Environmental Report?

19:

20 What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

20:

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

The number of linked documents posed a challenge for voluntary bodies.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.:

It was easy to complete, but we would have welcomed a mechanism to circulate a draft response amongst office-holders.