Introduction

West Dunbartonshire Council welcomes this Draft Climate Change Plan and the high level of ambition contained therein. The Council does, however, have some concerns about how realistic the level of required reductions contained within the Services and Residential sectors is.

West Dunbartonshire Council’s Progress to Date

West Dunbartonshire Council is committed to ensuring its compliance with the Climate Change Act, and to doing its part to ensure Scotland achieves its ambition of an 80% reduction in CO2 emissions by 2050. To this end, the Council has been working towards a reduction in CO2 emissions from its owned assets, as well as waste from the Local Authority area, of 15% (approximately 5,000 tonnes) by 2019 (over a 2012/13 baseline). Prior to this, the Council had succeeded in reducing CO2 emissions by 14% (approximately 4,800 tonnes) below 2006/07 emissions as of March 2012.

The Council is confident it will achieve the current reduction target, and has been doing so via energy efficiency measures, LED lighting, building upgrades as well as a capital programme where £226m has been spent opening 12 new buildings between 2010 and 2017. The Council has recently installed a biomass boiler at a primary school, and is currently in the due diligence phase of an LCITP application, which, if successful, will see the installation of a district heating network at Queen’s Quay. This network will utilise a water sourced heat pump, classed as a renewable heat technology, which will initially heat one of the Council’s main offices, a new care home, Health Centre, leisure centre and the existing neighbouring College campus.

West Dunbartonshire Council’s Understanding of RPP3 Carbon Budget in Services and Residential Sectors

The carbon budget for the Services sector, which includes all non-domestic buildings and therefore the entire Local Government estate, details an approximate 97% reduction in CO2 emissions from 2017-2032. The first few years’ reductions, until 2025 (with most of this happening by 2020), are envisaged to be met with energy efficiency measures (17.4% reduction), after which time low carbon heat will be prioritised and virtually all natural gas boilers will be replaced by low carbon technologies by 2032. Various funds, mainly in the form of match funding, as well as
the Renewable Heat Incentive, will form a package of policies which will motivate the sector to achieve this transformational change in the next 15 years.

A similar transformational change is planned for the residential sector, again with almost complete decarbonisation of the sector by 2032.

**West Dunbartonshire Council’s Response**

Whilst the Council supports this level of ambition, it also notes that despite the best efforts of the Public Sector, the Services sector’s emissions have actually increased since 1990. Further to this, the various loan and incentive schemes which will form the basis for the transformational change have existed for many years now. The Council therefore has concerns about how exactly this transformational change will take place, in 15 short years. Specifically, West Dunbartonshire Council has installed high efficiency gas boilers in a number of new buildings, and has also been running a programme of replacing oil heating systems with high efficiency gas systems. The boilers which have been installed across our estate will not, in the majority of cases, be due for replacement prior to 2032.

In terms of Planning, the Council, through the Local Development Plan (Proposed Plan) has already implemented within policy and planning guidance associated with the Plan, the targets set out in National Planning Framework 3, Scottish Planning Policy and the Electricity and Heat Generation Statements etc. Where the targets in the draft Climate Change Plan differ from existing targets, the Council would be grateful if Scottish Government could outline the procedure for changing the targets in existing guidance, if necessary, and the timeframe for this to enable any new targets to be included in the forthcoming Local Development Plan 2. Our Main Issues Report is scheduled to be publicised for consultation in May/June 2018, as detailed in the Development Plan Scheme (August 2016).

In particular, it would be useful that if there are to be any changes to targets in relation to heat generation and district heating networks that they could be communicated before or during preparation of the LDP 2: proposed plan, as this area is a Main Issue to consulted upon.

The Council would also be grateful for clarification of whether the development industry are being asked to comment on the new targets and how the revised targets will impact on the Scottish Government’s aim for delivering substantial new housing on the ground, through previous Ministerial statements and also through the proposals contained within the Planning Review document: People, Places and Planning, which is currently out for consultation. The reason for highlighting this is that to achieve the aim of more housing, regeneration etc, the introduction of new targets should also take into account the impact that this would have on viability of housing and in terms of West Dunbartonshire, our regeneration and city deal sites
i.e. Queen Quay, Clydebank; Exxon Site, Dumbarton and the Bowling Basin. The Council would be concerned that if new targets impact adversely on the ability to deliver a committed regeneration site, such as the sites identified above, that the deliverability of these sites could be impacted upon.

With respect to the residential sector, the WDC Local Housing Strategy 2017 -2022 published in November 2016 recognises the important role of Housing in supporting Scottish Government policy on climate change. One of the high level policy objectives of the LHS is to:

Reduce the impacts of climate change and fuel poverty by supporting energy efficiency measures across all housing sectors and by delivering on compliance with EESSH for social rented housing by December 2020.

The Promoting Good Quality Housing section of the LHS outlines measures proposed for the period of the plan including those around obligations under the Climate Change Scotland (2009) Act, EESSH, fuel poverty and district heating plan proposals. It also notes the Council's innovative Design Standard which will significantly improve the energy efficiency of all new social housing being supported through the Affordable Housing Supply Programme.

Adopting a more holistic approach to improving standards in the PRS is another of the LHS high level objectives and we particularly welcome the proposed consultation on minimum energy efficiency standards for this sector.

Questions

(1) Will the Scottish Government provide capacity for developing local district heating plans and renewable heat feasibility studies?

(2) Will the Scottish Government begin to mandate the switch from gas to renewable heat in public sector buildings?

(3) The Council has a regular programme of upgrading works where old oil boilers are replaced with modern gas boilers. When should Councils cease replacements with gas boilers and what should Councils look to replace with instead?

(4) Can the Scottish Government provide more clarity as to the level of reductions that are required to be achieved on an organisational level?

(5) As the Council’s Energy and Sustainability Team is already working at full capacity, will the Government provide extra funding to increase the capacity of the team in order to access SEEP, LCITP, Salix, etc?

(6) Will the Scottish Government consider publishing a Scotland-only grid emissions factor?
The SG has designated energy efficiency as a National Infrastructure Priority, the cornerstone of which will be Scotland’s Energy Efficiency Programme (SEEP). To this end, the SG has confirmed the commitment of £500m to be available through the SEEP budget. However, as a route map detailing how this programme will deliver energy savings is not expected until 2018, the Council has concerns that the programme will be able to deliver on the sectoral transformations it is expecting. £500m in match funding, although a positive contribution, will not be sufficient to deliver on this transformational change throughout the Country.