

Green Micropower Bill

**Friends of the Earth Scotland
Association for the Conservation of Energy**

Consultation response March 2006

Introduction

Friends of the Earth Scotland (FoES) and the Association for the Conservation of Energy (ACE) warmly welcome the proposals set out in the Green Micropower Bill consultation document. We believe that in order to reduce climate change emissions, Scotland must grasp the opportunity which micro-renewables present. In order to do this, the Executive must put the right policy framework in place. The proposals set out in the Green Micropower Bill would help to deliver such a framework.

1. What are your views on the proposed approach of legislating to require targets to be set for micropower?

Ministers should be statutorily obliged to established targets and timescale for the promotion of micro-generation capacity.

Robust targets create an incentive for action and are, in our view, essential to ensure that progress is made in this area. Other policy areas (for example waste management, renewable electricity) have shown that robust targets backed by an action plan can deliver results.

The Scottish Executive's existing targets for renewable electricity generation have been very successful in developing large-scale onshore wind, but have been less successful in promoting other technologies or micro-renewables. A micro-renewables target would help to address this.

As with large-scale renewables, statutory targets would give industry the confidence they need to invest in new technologies and research. Without stable policy framework established through high level targets set through legislation, the micro renewable industry may find it very difficult to make long-term decisions on investment and recruitment.

2. Should targets be set by the Scottish Executive or local authorities or both?

The Bill should require both the Scottish Executive and local authorities to adopt targets by certain dates and report on them.

Most resources for the promotion of micro-generation e.g. SCHRI have been distributed by the Executive and building and planning regulations are set nationally and a target is therefore appropriate.

At a local level Councils have scope to vary local planning guidelines or provide their own grants and advice. In this respect Merton Borough in London have shown that local

authorities can have considerable impact. In practice national targets will not be met without the co-operation and assistance of local authorities.

3. At what level(s) and over what time frame(s) do you think micropower targets should be set?

Targets should be set for both medium and long-term timescales. At present, the Scottish Executive's renewable electricity targets are for 2010 and 2020, and were initially set in 2002 and 2003 respectively. We would suggest an initial target of five years from the entry of the bill into law, followed by an interim target of 15 years after the entry of the bill into law. A longer-term target for 2050 could also be set, to complement greenhouse gas reduction targets set for that year.

The key question, however, is how any target should be expressed. One possible approach is to have two targets, one for micro-generated electricity capacity, and one for micro-generated heat capacity. These targets could be expressed as a percentage of total generation, or as an actual amount in megawatts. Another approach is to express the target as the number or percentage of households or businesses benefiting from a micro-renewable device.

An alternative approach would be to express the target as a CO2 reduction, both at Executive and at local authority level. However, if this approach is taken, it should be expressed in a way that does not unfairly advantage some technologies at the expense of others.

4. How frequently and by what means do you think reporting on progress towards meeting targets should take place?

Reporting should be on a regular basis, and at a minimum biannually. Reports should be placed before the Scottish Parliament, and subject to a parliamentary debate. Local authorities should report to Scottish Ministers and Scottish Ministers to parliament on their performance and achievements.

5. What are your views on the following specific measures in the bill? (for background about these measures, please see section on 'What will the Green Micropower bill do?')

(a) Requirement for micropower in all new developments

We support this proposal, which has worked well in a number of pioneering local authorities in London, specifically Merton and Camden. Initial opposition from some developers on the grounds that it would lead to developers going elsewhere have proved unfounded.

(b) Council tax and business rates rebates for micropower installers

One of the largest barriers to the increased uptake of micro-renewables is financial. The proposal to give council tax and business rate rebates to those who install micro-

renewables in their business or home is therefore a vital part of the package. As identified in the consultation document, the Energy Saving Trust have identified council tax rebates as those most likely to encourage consumer action. As such, we fully support this proposal.

(c) Permitted development status for micropower devices

We agree that permitted development status for micropower devices would assist greatly in removing barriers to wider uptake of these technologies. We understand that the Scottish Executive are currently consulting on this issue.

At present, installing a satellite dish on a house, which is not in a conservation area, does not require planning permission. By contrast, installation of a building-mounted micro wind turbine does need planning consent, despite being of comparable size and level of visual intrusion. The only issue that would need to be addressed would be noise, something that has not proven a problem in units already installed through government grants schemes.

Most of today's solar water heating panels protrude around 12 – 18cm from the plane of the roof. Since any addition to the roof that protrudes more than 10cm from the plane requires planning permission, installers are forced to seek consent for the sake of a 2cm additional protrusion. The law clearly requires updating, as it does not take account of modern technology.

In considering the circumstances under which permitted development status is granted, we would suggest the following parameters:

1. **Building-mounted wind turbines** should be given permitted development (PD) status. This should apply on all buildings, with the exception of those in conservation areas. We would suggest the following turbine limitations:
 - 1.1. they should emit no more than 5dB(A) noise above background, and no more than 45dB(A) overall
 - 1.2. they should conform to BS EN 61400 – Part 2
 - 1.3. they should have a blade diameter not exceeding 2.5m
 - 1.4. the distance between the installed rotor hub and the highest point of the building is not more than 3.5m
2. **Stand alone wind turbines** installed within the curtilage of a building and which conform to conditions 1.1 to 1.4 (above) and with a hub height of no greater than 15 metres should be given PD status.
3. **Roof-mounted photovoltaic** or other solar panels should be given PD status on all buildings except those in conservation areas. We would suggest the following limitations:
 - 3.1. the installed panels should not extend more than 20cm beyond the plane of any existing roof slope.
 - 3.2. the installed panels should not extend more than 10cm above the original building height.
4. **Biomass boilers and CHP systems** should be given PD status. We would suggest the following limitations:
 - 4.1. Applies to all systems up to 20kW rated value
 - 4.2. Applies to those systems where the associated fuel store is no more than 50m³ in size.

- 4.3. Applies to those systems where the associated chimney / flue is no more than 10m in height.
5. **Micro-hydro systems** should be given PD status. We would suggest the following limitations:
 - 5.1. Applies to all systems up to 10kW rated value
 - 5.2. Applies only where existing civils / leats are used
6. **Heat pumps** (including ground source, air source and water source) should be given PD status. We would suggest PD status applies to all appliances up to 20kW rated value.

(d) Renewable obligation certificates for micropower generators

We support the proposal to extend ROCs to micro-generators. As identified in the consultation document, the key to making ROCs accessible to smaller scale generators is to reduce the complexity of the application process. This should of course be done in a way that does not affect overall confidence in the ROCs themselves. One way of doing this might be to establish micro-renewables co-operatives, who would apply for ROCs on behalf of a number of households or businesses.

(f) Renewable fuels or renewable heat obligation

We support the proposal to include a renewable heat obligation, as set out in the consultation document. We understand the Executive are currently considering this.

(e) Guaranteed capital grants for micropower

As mentioned in the consultation document, the SCHRI programme has been successful in stimulating demand for micro-renewables in Scotland. We firmly believe, however, that funding must be guaranteed on a longer-term basis, in order to provide the stability to allow manufacturers to invest and plan ahead. We would suggest that the existing SCHRI funding levels be doubled from the current level, and that a regular three-year funding cycle is introduced.

6. Are there any other specific measures to promote micropower that should be included in the bill?

The consultation document does not have any specific proposals to use micro-renewable technologies to tackle fuel poverty. We believe this to be an oversight, especially given recent price rises in both oil and gas which have forced more Scottish families back into fuel poverty. Micro-renewable devices have considerable potential, when coupled with energy efficiency measures, to alleviate fuel poverty, especially in rural areas which are not connected to the gas grid.

One possible mechanism to support micro-renewable technologies to tackle fuel poverty would be to enable their installation through the Scottish Executive's 'central heating programme'. This enables those over 60 without a central heating programme to have a central heating system installed in their house or flat. Extending this programme to key micro-renewable technologies, such as biomass CHP, would help in the alleviation of fuel poverty at the same time as promoting micro-renewable technologies. Consideration should be given to inclusion of a similar mechanism in the bill.

At a legislative level the bill should oblige Ministers to take account of how micro-renewables can assist with meeting targets set under **Section 88 of the Housing (Scotland) Act 2001** regarding fuel poverty.

7. Is there anything else you would like to add?

We would like to reiterate our support for this bill proposal, and congratulate Shiona Baird MSP and her staff for having the foresight to bring it forward.

Friends of the Earth would be happy to provide further advice at later stages in the Bill's passage.

Chas Booth
Parliamentary Officer
Friends of the Earth Scotland & Association for the Conservation of Energy
cbooth@foe-scotland.org.uk
0131 554 997