

Fife Local Heat and Energy Efficiency Strategy Consultation Response

Fife Communities Climate Action Network, October 2023

This document is Fife Communities Climate Action Network's response to Fife Council's consultation on their draft [Local Heat and Energy Efficiency Strategy \(LHEES\)](#). Our response was compiled from comments gathered from FCCAN members at an online event on 18 October 2023.

The consultation questions are shown in blue. The consultation closes on 29 October 2023.

Do you agree with the vision of the LHEES?

No

Please provide any comments on the vision?

The vision is not suitable. We feel it is rather bland, unambitious and lacks urgency. There is no indication of timescale in the vision. Without an ambitious vision from the start, we will not get anywhere.

The vision should be made more ambitious and should include an ambitious end goal. We want to get to net-zero housing in Fife, not just "improve" as is currently stated.

We feel there is a need for a timescale or (interim) targets in the vision. This will provide a datum from which progress can be assessed. Including targets will build public confidence of delivery success and will prevent the "can being kicked down the road". We feel that reference to Scottish Government targets should also be made.

The language fails to show urgency. Including additional adjectives such as "rapidly" or "timely" would help with this. Also, use of active language, for example, "the strategy *will* improve energy efficiency" would make the vision stronger and more inspirational. Including targets or timescale would also help.

Making the vision SMARTer will give it more impact, greater ambition, more urgency and be a greater call to action.

Whilst the stated vision reflects what we need to do and is a step forward, it fails as a call to action and will not "chime" with the general public. The vision needs to inspire and make people think this is for them. Fife Council need to take people with them on this journey to greener housing and see it as something we must do together.

Most people are not aware what it means to be "climate friendly, ready and just". And most will not make the link to the council's Climate Action Plan outcomes. It seems a little too easy to just copy the language of the plan. Climate language may be a turn off for some audiences, for example "decarbonise".

Priorities and Outcomes

Q) Do you agree with the priorities and outcomes as outlined in the strategy?

This consultation question requires the scoring of each of the priorities against a predetermined list of options. FCCAN “strongly agree” with all the priorities.

Q) Are the priority titles clear and easy to understand?

This consultation question requires the scoring of each of the priorities against a predetermined list of options. FCCAN answered “Very clear” for Priorities 2 to 8. For Priority 1, we answered “somewhat unclear”.

Q) Please provide any comments on the LHEES priorities?

General Comments

- Language and targets: Overall, the language of the priorities is weak, for example “move towards”, “become more”, “work towards”. The priorities and outcomes need to be much more action focused, ambitious and should include targets. Not including target figures means there is nothing to measure success against and those delivering cannot be held to account.
- How priorities interact/link: We are not sure about the order of the priorities. For example, why is Decarbonisation at the bottom of the list? Especially as decarbonisation is overtly part of the definition of being Climate Friendly. Also, some priorities have clear links and progress of one may impact delivery of others. For example, Skills and jobs will impact on Decarbonising Heat Sources. This raises questions of timelines, of priorities and what will be delivered when.
- Role of homeowners: There is an assumption that Fife Council will be delivering most of the work required. While this is appropriate for their housing stock and often for those in fuel poverty, there are many private owners who have the capacity to deliver on some of these priorities.
- Delivery of many of the priorities will sit with the council, but it should be remembered that the council’s role is to provide leadership and support to allow Fifers to take action themselves too. There needs to be a way of finding people who want to take action and to make it easy as possible for them to do so. There will also be homeowners who want to take action, but who feel out of their depth when confronted with this complex strategy. How do we support those whose knowledge base is low, but just don’t know where to start (high motivation, low skill).
- Future proofing: Some of our members raised the issue of advice changing in the future. The strategy could commit Fifer’s to one direction, only to find that 5 years later advice has changed. Examples suggested were advising to install a certain type of heating system, such a heat pump, or changes to EPC ratings currently being consulted upon. Will advice or ratings change in the future throw off LHESS, data collection or priorities?
- New housing: The council’s needs to be stronger with construction firms building non-efficient buildings and should be incentivising decarbonised heating systems. Building poorly insulated housing with gas boilers and bare-minimum renewable options is creating problems for the future and is working against the aims of this strategy. Seeing new non-efficient, gas heated homes will disincentivise Fifers from making climate friendly decision on their own properties.

Priority Specific Comments

Priority 1 Being Climate Friendly and Ready

The less engaged part of the audience will not know what is meant by climate friendly and ready. This is also true of some of the climate language, such as adaptation or net zero. This would need to be addressed under the Maximising Knowledge and Awareness priority.

Priority 2 Fuel Poverty, Health and Just Transition

Delaying taking action whilst data is collected could risk leaving people in fuel poverty who could be helped out by making climate friendly changes. There is also a risk of people feeling left behind. Careful consideration needs to be given when deciding on criteria for success to balance data gathering and the urgent need for action.

Priority 3 Supporting an Inclusive Economy, Jobs and Skills

3.1 – When thinking about training and skills improvement, we need to make sure that funding reaches all training providers, not just colleges, as they are not always the best placed to train or retrain.

3.2 – This sub-priority mentions place in the context of community wealth-building, but there needs to be more than the current area-based schemes to ensure the strategy moves forward at speed and scale. This requires place-based solutions and support. And should include all areas, not just areas where the biggest impact can be measured or with lowest SIMD score.

Priority 4 Maximising Knowledge and Awareness

There is a need for communication via community organisations and networks, for example FCCAN, FVA and Fife Centre for Equalities. These trusted messengers have a great power to reach Fifers and for their messages are more likely to be taken on board. But in order to give time and resources to this messaging, funding may be required. Community organisations are time, resource and funding limited.

There are so many different messages that must be delivered to different audiences. All stakeholders will have to get it right to prevent messages getting lost or only partial messages landing.

Cosy Kingdom are mentioned a number of times through the document as a stakeholder to provide public energy advice. The service available from them is fantastic, however, to reach the size of audience that is required will require many more energy advisors. Currently, the exiting team spend the vast majority of their time supporting people in fuel poverty rather than those looking to decarbonise. A great deal of investment will be required if Cosy Kingdom (or similar) are going to be reach a bigger, higher emitting audience.

Priority 5 Ensuring Certainty of Success

We are concerned that this priority could lead to missed opportunities, delayed timeline or could lead to people feeling alienated. This could be because no action takes place while data is gathered or they get the message that taking action isn't for them. We feel including this priority could act as an excuse for in-action or under ambition.

By waiting until data is collected, we are potentially wasting time that we do not have. We need actions to start as soon as possible. How much data is enough before we can start

delivering? Taking the wrong action is a risk, but so is not taking action quickly enough or at all.

No large project can have complete certainty of success. Isn't it better to encourage action, learn and move on?

We also have concerns about what the criteria is for deciding levels of certainty and who would be responsible for making the decision. Consistency is also needed in the process across Fife, across priorities and though the lifetime of the strategy. Updates to the success criteria would also have to be made.

Priority 6 Transitioning the Energy System

It could undermine public confidence in decarbonised energy systems if it is believed the grid will not be able to cope with increased electricity demand.

Hydrogen is unproven as a replacement fuel and timelines for implementing at scale are too long. Putting too much emphasis on it is a risk.

Priority 7/8 Energy Efficient Buildings and Decarbonising Heat Sources

We would like to see community run facilities being prioritised and not just council owned non-domestic properties, particularly in known high SIMD areas.

A lot of the easy work has been done. We now need to look at the harder to treat buildings, which means having better trained people looking at them. By focusing on "core" building there is a risk that building deemed "non-core" will feel left behind and become disillusioned. We feel that if people/organisations are interested to make change they should be supported.

A large part of achieving success in getting decarbonised heating systems into people's homes is trust and understanding. People need to understand what is going to happen to their homes. This explains the appetite for hydrogen systems, as people understand gas and can see the similarity. It is harder to sell more unfamiliar systems.

The cost of retrofitting and installing alternative heating may be prohibitive for many community organisation and businesses. Or they may be unwilling to make the investment in a building if they are renting it. Even larger community organisation may be reliant on grant funding, so may not have the capital to invest or doing so may be seen as high risk.

Q) Are there aspects of your, or your organisation's, work which is not captured by these priorities, but you feel should be recognised?

FCCAN and the groups that make up our network, are at the heart of communities. We would like to ensure that community and community groups will be involved in the delivery of the strategy. We can be a driver of individual and group action in our communities. However, to deliver this support takes time, money and resource. All of which are in short supply in community organisations. This needs to be considered when creating a detailed deliver plan. Groups might need council budget and support to deliver action.

Community organisation own buildings that will need retrofit and heating systems and could link into heat networks. They could be targeted as change makers and could act as demonstration sites and role models.

High Level Delivery Plan

Is the scope of the high-level actions in the Delivery Plan suitable?

This consultation question requires selection from a list of predetermined options. FCCAN answered "Scope of some actions suitable".

Please provide any comments on the Delivery Plan, including on actions you believe are unsuitable (where possible please relate to specific actions)?

General comments

The high-level actions are a good starting point, but the devil will be in the detail! We are aware that like the priorities, the delivery plan will see overlap and one action influencing others. We need to ensure that delivery of actions is joined up and that stakeholders are pulling in the same direction, supporting each other and practising effective communication.

We feel that the language could be stronger and more ambitious. Words like "identify", "explore" and "improve" are not very active and makes the strategy sound like a pilot project. We would like to see more confidence and clarity.

It is unclear how the timeline of the delivery plan will run. And if categories/actions will be prioritised. Decisions on delivery priorities may be linked to funding too. Some may need to happen before others can take place.

There is no indication on who is responsible for checking that actions are being delivered. Will the council be marking its own homework?! How will you know if progress is being made or identify areas where a change of approach is required? Again this requires a need to include targets and timelines. There also needs to be public sharing of progress as part of communications and awareness raising.

Heat Networks

It is important to both expand existing ones as well as start new ones in the best locations. In built up areas a heat network is far preferable than individual heat pumps.

Funding

A huge barrier to delivering the strategy is going to be funding. We would suggest stronger wording around these actions and more detail about where funding will come from. Could we also have more ambition here to ensure success?

We feel it is important that promoting funding goes hand-in-hand with knowledge and awareness raising, as people need to know what funding is available but *also* what is possible for them and their location and how to take plans forward.

Are there any specific, detailed actions which should be included in the Delivery Plan?

Building Level

Following on from building level studies, we suggest there is a need for a "road map" for the best solutions for Fife buildings. This will help Fifers identify what is right for them and what their first steps are.

Heat Networks

We suggest including an action to enforce current Scottish Government and Fife Council policy requiring heat networks on new larger housing developments. This would create developer led heat networks in Fife.

Energy systems

An action should be included on the role of energy sharing, peer-to-peer trading and private wires in our energy system.

For the settlement plans there needs to be consideration of how the community can assist in the development of energy systems.

Skills and Jobs

We believe there is a need to train Fife Council staff to maintain heat pumps.

Fife Council and Scottish Government should have a trusted installer scheme to ensure best practice is followed and the right heat source and energy efficiency measures are being installed. Good public experiences are important in encouraging others to make changes. This will increase chance of success.

Knowledge and Awareness

We would suggest a need for a high level action around engaging people, getting buy in and bringing them along on the journey. Increasing knowledge and awareness is important, but we also need to inspire and make people want to do their bit and be proactive rather than wait for the council to deliver change.

It is important to reach unengaged or unaware audiences who have the means but not the motivation. This strategy must reach those who are not in fuel poverty and make them feel that saving energy is relevant to them too. This is important as this group produce more greenhouse gas emissions. What homeowner doesn't want to live in a well-insulated and cheap to run home? We have a good product to sell, we just have to make sure we reach people.

There needs to be effective signposting to support for those self-funded owners and landlords to take action. It is an easy win if some people can make the change themselves. We need to make sure people get the full message – that new heat systems and energy efficiency go hand in hand.

The energy job sector needs to be engaged as well, to raise awareness amongst companies and employees. They need to be aware of the strategy and convinced that selling decarbonised energy systems and retrofitting is the present and future. This would give workers the confidence to engage with the strategy and to commit to re-training.

Landlords are another group who may need special attention in delivery of messaging. They may be less likely to take action due to the cost of retrofitting multiple properties or because they do not live in their properties themselves. Businesses and private tenants may want to make changes, but not have the power.

There are successful heat and energy efficiency projects in Fife, for example Ore Valley's energy efficient and decarbonised social housing. And people with experience and expertise.

Peer learning would be a cost-effective method of improving delivery, outcomes and spreading awareness without having to reinvent the wheel or delay action.

Data Modelling

Using Local Place Plans is a good way to approach the energy issue, but we also need to use non-geographical approaches too and target high emitters and heat users.

If you are responding on behalf of an organisation, what actions could your organisation deliver to support the LHEES? Please provide details.

We can promote the strategy to our network and beyond through social media, newsletters and events. We are already in discussion about delivering an engagement event in early 2024 on LHEES in partnership with the Climate Change and Zero Waste Team.

How do you see yourself or your organisation contributing to the delivery of the strategy and delivery plan (e.g. undertaking delivery plan actions, training, promotion, etc.)?

FCCAN can contribute to the knowledge and awareness raising category of the delivery plan. We can do so through our Climate Hub project, our membership and as a partner of Climate Action Fife. We can also promote and signpost to funding.

We can make specific asks to our members as a whole or approach specific members based on a delivery need. This could be, for example, to get feedback or data to improve the LHEES; promote a specific delivery action; or to ask a group to be a case study of good practice.