Introduction

The Sustainable Scotland Network (SSN) supports public sector action on sustainable development. This includes programmes on climate change and sustainable procurement. The Scottish Government provides funding to Keep Scotland Beautiful to develop SSN and the SSN Steering Group guides the SSN agenda. Building on over a decade’s work with local government, SSN is now opening up its support to the wider public sector.

This consultation submission draws on a number of Sustainable Scotland Network (SSN) information and research sources, including analysis of the Year 4 reports from local authorities on Scotland’s Climate Change Declaration (SCCD) published on 19th February 2013, as well as regular communication with SSN members working in Scottish local authorities.

The submission responds to the key consultation questions identified by the four Scottish Parliament Committees scrutinising the draft second RPP (RPP2), as well as the specific areas of interest of the Local Government and Regeneration Committee.

Responding to the four key questions raised by all Committees

Local Authorities and RPP2

As the draft RPP2 states, local authorities have demonstrated leadership on climate change. All 32 local authorities have signed Scotland’s Climate Change Declaration and have for the second year in a row voluntarily reported on their Declaration commitments. A recent analysis of Year 4 reports found the following:

- **Influence**: The introduction of the Public Bodies Climate Change Duties in 2011 is influencing councils and Community Planning Partnerships to consider how they can demonstrate compliance – e.g. reviews of SOAs and Corporate Plans, new outcomes for SOAs that include regional carbon footprints and developing council-wide climate change strategies to inform high level strategies. However, new Community Planning guidance does not explicitly highlight climate change as a priority for SOAs. SSN members have raised concerns about how this could track through to refreshed SOAs and subsequent public sector funding decisions.

- **Alignment and improved local and national linking**: More needs to be done to align SCCD reporting on emissions reduction activities with national reduction strategies such as the Report on Proposals and Policies. Local actions should be better informed by the RPP and local authorities should be supported to use RPP information to better guide and report on local climate change activity. SSN is already seeking to work with key stakeholders and public sector officers to address this challenge, based on experience with SCCD reporting and wider Public Sector Sustainability Reporting and other relevant reporting requirements.
• **Continued and enhanced support and momentum:** Given the pivotal role of Carbon Management Plans to date and the emphasis placed in the RPP on ramping up emissions reductions in the public sector through Carbon Management Plans, support for this will be critical to ensure the delivery of this aspiration. Carbon Management Plans have helped scale up engagement and action on corporate emissions in the public sector. Next steps will need to improve consistency and rigour, as well as ensuring that plans are adequately resourced and implemented.

• **Understanding and assessing compliance:** In order for local action on climate change to be better aligned to national proposals and policies, the guidance and framework for compliance with the Public Bodies Climate Change Duties should be developed further to ensure that local authorities are clear about what compliance means. This could include developing indicators to allow consistency and comparability across the public sector. Furthermore, an evidence based approach to assessing compliance could be developed, supporting the sharing of professional experience and expertise across and within public sector bodies.

**Responding on the Specific Areas of Interest of the Local Government and Regeneration Committee:**

1. **Local government spending and plans on climate change targets**

   • **Carbon reduction and finance:** All Scottish Councils have worked with the Carbon Trust to develop Carbon Management Plans, including designated finance for carbon reduction measures.

   • **Mainstreaming:** Local authorities’ development of sustainability frameworks, Energy Action Plans, Renewable Energy Strategies, Climate Change Strategies and Plans, Sustainable Communication Strategies show commitment at a local level. An example of embedding climate change in major funding decisions, Highland Council address climate change within their Capital Programme. The Programme will have an allocation for projects which reduce carbon emissions on a spend-to-save basis and issues relating to climate change are considered when deciding to fund a process. Some local authorities are driving climate change agenda through CPPs and SOAs.

   • **Influence:** It is easier to find support within local authorities for initiatives that generate income or are mandatory; generating genuine commitment to ‘softer’ requirements is more difficult

   • **New community planning guidance:** The new Community Planning guidance states that all community planning partners, including local authorities, should be prioritising spend / resources according to the priorities taken forward locally through the SOA, which should be the top of the planning hierarchy for all Community Planning Partners (CPPs). However, as mentioned above, new SOA/CPP guidance does not explicitly mention climate change.
2. Planning policy and climate change targets

- **Mainstreaming:** Local authorities are increasingly including climate change considerations directly in planning policies around infrastructure and specific areas such as housing and renewable energy, often using Scotland’s Climate Change Declaration as justification for this.

- **Awareness and understanding:** There needs to be work done to improve the overall understanding of climate change amongst local authority officers and across key departments so that national targets can be embraced across the board.

- **Planning as a driver for action on climate change:** More work could be done to use the role of planning as a regulatory mechanism for action on climate change.

- **Planning and area wide emissions:** Planning policy is fundamental to addressing area-wide emissions, but Community Planning, climate change awareness and public engagement work also have key roles to play in tackling area wide emissions.

3. Communities aspects of climate change and the role of regeneration policy in delivering on climate change targets

- **Partnerships are key but so is ownership:** Successful partnership working with organisations outside of local authorities is usually underpinned by a shared budget and outcomes. Without shared budgets and clear objectives, action is not as strong.

- **Community Planning Partnerships and reporting:** Local authorities are active in driving climate change action through CPP and SOAs. However, it can be difficult to get feedback and input from community planning partners to inform reporting under the SCCD, which means there is not always a clear picture of the sheer amount of good work being done in the local area.

- **Community action and behaviour change:** While the RPP2 acknowledges the position of influence that local authorities have in their local area, it is challenging to inspire community action from within a local authority. Where local authorities do try to engage with the wider local community it tends to be through community planning on the key issues for the partnership such as health, community safety, local environmental quality or personal and immediate issues like pot holes.

- **Regeneration and climate change:** There is a question around whether regeneration policy has been perceived by local communities or local authorities as a key route to tackling climate change and achieving a low carbon economy, despite its potential in this area. More should be done to foster understanding and action on mutually supportive interventions.
• Economic development and climate change: Economic development is a key part of community planning. However, joining up the dots on acting on sustainability and climate change and the positive economic repercussions of this could be further emphasised.

Conclusions

From SSN’s experience and perspective, some of the key conclusions from local authority and wider public sector work on climate change though Single Outcome Agreements and Community Planning Partnerships include:

• More could be done to help local authorities and CPPs to ‘localise the RPP’, so that local policies and proposals are better aligned with agreed national plans.

• More could be done to clarify the policy landscape and to clarify what local authorities and CPPs are expected to deliver, where, when and how. Different localities will have different scope for action, but all local authorities and CPPs would benefit from improved clarity on what compliance to the Public Bodies Duties means and what their required contribution to the RPP is.

• More could be done to support the development of local business cases for investment in climate change action. Proposals and policies must be supported by adequate resources, and suitable investment business cases need to be developed to ensure effective and efficient resource allocation. Linked to improved business case development is the need to also improve the public sector/local authority capacity to undertake robust carbon impact assessment of policies and programmes.

• Experience with Scotland’s Climate Change Declaration indicates that much is already being done by local authorities to address climate change. However, SCCD reporting needs to be developed and given more status to ensure that the reports provide good evidence of all relevant policies, proposals and programmes. Reporting to date presents an excellent basis upon which further development can be undertaken while maintaining support from all local authorities. Any steps towards mandatory reporting needs to take account of SCCD reporting experience and the scope and value of this approach.

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