Written Submission from Sustainable Scotland Network

Early Stage Comments on the Draft Climate Change Plan, January 2017

Introduction

The SSN exists to promote action and good practice on climate change and sustainable development throughout the public sector. SSN has members across the public sector, including in each of the major players recognised under Scottish Climate Change legislation. At the core of SSN is a partnership between the Scottish Government (SSN’s principal funder), Keep Scotland Beautiful and SSN members throughout the public sector. These three key stakeholders come together in the SSN Steering Group which informs and guides the SSN work programme.

Reviewing the Climate Change Plan

In order to meet the deadlines for giving evidence to the Scottish Parliament’s Local Government and Communities Committee, SSN has had to expedite a short process for gathering views on the CC Plan. The SSN Steering Group met on 25th January to discuss the Plan and share views. This briefing paper is based on that meeting and some common themes that have run through SSN’s work on climate change in recent year.

SSN’s key comments on the draft Climate Change Plan are:

SSN Welcomes the Draft Climate Change Plan

We welcome the publication of the draft Climate Change Plan and the high level of ambition of the Scottish Government contained within it. The level of ambition is welcomed and the structure of the Plan is an excellent step forward from previous Reports on Policies and Proposals. It is great to have the ambition, which the science of climate change warrants.

SSN also welcomes the opportunity to participate with the Scottish Government and others to improve understanding of the Climate Change Plan and to embed it in the everyday policy, management and activities of the Scottish public sector. SSN is already engaged with the Scottish Government and SSN Partners and Members throughout the public sector, and therefore is well placed to help raise awareness and build capacity to deliver on the Climate Change Plan.

Delivering on the Ambition

SSN has concerns about how this 15-year plan relates to the current reality in the public sector. Of particular note is how the 96% reduction in the Services Section (of which the public sector is a part) will be achieved. In the short run of the next four years or so, this will be heavily dependent on ramping up action on energy efficiency; and for the period from 2025 to 2032 this will be reliant on new technologies being available, adopted and implemented and a significant move away from gas heating. While it is too early to make a thorough assessment, we have concerns relating to ability to scale up the pace of action on energy efficiency measures, the availability
of appropriate technology, the barriers related to getting projects delivered, and the need to take a system-wide view on how to implement the changes envisaged. SSN would therefore welcome on-going opportunities to work with the Scottish Government to look in detail at how these targets can be met.

Leadership

Based on our experience of working on climate change within the public sector, SSN would suggest the need to invest in and prioritise the development of climate change leadership in the public sector. The Climate Change Plan implicitly requires leadership across all sectors of society, and the embedding of climate change and carbon literacy across public sector leadership will be vital.

SSN has promoted public sector climate leadership over many years, through its communications, resources and events, and it would relish the opportunity to continue to work with the Scottish Government and public sector leaders to develop and implement leadership capacity building which is commensurate with the needs of the Climate Change Plan.

Many SSN members are themselves engaged in supporting public sector leadership on climate change, and our work on reporting and behaviours both offer good opportunities to inform and implement leadership development initiatives. We would also welcome action by the Scottish Government directly to ensure that the Climate Change Plan is made an effective driver of public sector leadership; addressing the individual, social and material barriers that hamper leadership currently.

Embedding and Strategic Alignment Across Public Sector Portfolios

SSN would encourage the Scottish Government to look at how the Climate Change Plan relates to other public sector agendas, and work to ensure good strategic fit with the wide sweep of public sector reform, investment and innovation. SSN is aware of work underway to progress this within the Scottish Government, including through the use of the ISM low carbon behaviours framework. We also welcome the reference in the draft Climate Change Plan to the co-benefits of climate change policy; vitally important if the Plan is to resonate with and engage a wide range of public sector services and professionals. One example where the draft Plan could be stronger is around trees/greenspace in towns and cities with co-benefits for air quality, active travel (on green networks and greenspace), hence physical and mental health (restorative environments) and adaptation to climate change. SSN encourages the Scottish Government to continue to prioritise these efforts we the Plan is implemented, and we would welcome further opportunities to work with the Scottish Government to improve alignment across public sector portfolios.

In addition, SSN would highlight the importance of investing in on-going efforts to improve vertical alignment between national climate change policy and the policies and projects of public sector organisations, including local authorities. As time and resources are limited, we need to work together to align public sector action on Climate Change at all levels in Scotland. SSN is particularly keen to explore how alignment between public sector organisations and communities can be improved, and the fact that the charity Keep Scotland Beautiful managed and operates both
SSN and the Climate Challenge Fund offers a ready opportunity to scale up action on this issue.

**Horizontal Alignment and a Collaborative Approach**

SSN is also keen to work with the Scottish Government and other stakeholders to improve horizontal alignment of efforts between public sector, businesses, communities, etc. Our work demonstrates that alignment of efforts – say in relation to well-coordinated, multi-stakeholder area-based initiatives – can be vital in scaling up impact and reducing wasted effort. With a new Climate Change Plan in place, work will be needed to support awareness and coordination across sectors in line with the new Plan. Section 3 of the draft Plan emphasizes the need for a collaborative approach’. SSN endorses and supports this principle and welcomes clear reference to the important role played by local authorities. SSN thinks that the draft Plan could be improved by including stronger reference to other parts of the public sector, including the work of key national public bodies which play significant leadership roles in Scottish society.

**Reviewing and Aligning Resources to Deliver**

It is clear from the scale of ambition and range of policies and proposals being considered that we need to better align resources – financial, human, technical, time and built resources – to deliver on the Climate Change Plan. This may require scaling up specific funding streams directly targeting climate change activity, but also directing other investments (for example City Deals) to ensure they deliver what is needed for the Climate Change Plan. Additionally, funding mechanisms need on-going review and reform to enable this ambitious 15-year plan to be implemented – which may require reform of what can be a rather fragmented and short-term funding landscape.

**Linking Public Sector Reporting to Climate Change Plan Monitoring**

We welcome the commitment to improved monitoring of the CC Plan and we look forward to working with the Scottish Government to mature and align the new mandatory Public Bodies Climate Change Duties reporting with this monitoring. In particular, the voluntary ‘wider influence’ reporting data could be improved and used to better link public sector reporting with CC Plan monitoring. This will be a technically challenging process, but one that SSN would welcome as PBCCD reporting progresses.

**ISM and Behaviours**

SSN welcomes that clear reference to behaviour change in the CC Plan. SSN is particularly pleased that the ISM framework is the key approach reference in relation to behaviour change. SSN supports the wide spread take up of using ISM across the public sector to better understand, plan, implement and evaluate climate change interventions. SSN uses the ISM framework in its behaviours work, and we welcome the opportunity to continue to work with the Scottish Government and SSN Members to use ISM in their climate change policy and practice.