Written submission from SOLACE Scotland

Introduction & Background

The Scottish Government’s Third report on Policies and Proposals, the draft Climate Change Plan (CCP), provides the direction and focus in respect of meeting its greenhouse gas reduction targets from 2017 to 2032.

Whilst we welcome the opportunity to contribute towards the CCP, longer timescales would be required to provide a more detailed and thorough response to the current draft.

Targets

The CCP is a welcome update, as it brings together multiple areas which contribute towards how Scotland can tackle climate change through the reduction of greenhouse gas emissions, whilst setting challenging interim targets in respect of meeting the ultimate goal of reducing emissions by 80% by 2050. Local authorities are key stakeholders and deemed “Major Players” under the Climate Change (Scotland) Act 2009 - their input will be fundamental in the delivery of many policies and proposals within the CCP.

Previous Reports on Proposals and Policies (RPP1 and RPP2) have attributed specific emissions reduction targets to individual policies and proposals, or anticipated costs of achieving the targets in each sector. The draft Climate Change Plan does not include such detail (largely as a result of employing the TIMES model), and therefore, understanding the relative significance of the different policies and proposals and how these contribute to the overall plan is difficult, especially for local authorities.

It is clear that good progress is being made in terms of meeting carbon emission reduction targets in Scotland, with the 2020 target of achieving a 42% reduction against baseline levels being met 6 years early, in 2014 (the actual reduction figure when taking into account the EU Emissions Trading System was 45.8%). Emissions in Scotland have fallen by an average of 3.3% per year since 2009, mostly due to progress in decarbonising the power sector through reduced reliance on coal and a much-expanded renewable energy sector. However, little progress has been made in reducing emissions from transport, agriculture and land use, while progress has been slow in terms of increasing the availability of renewable heat. The CCP aims to address this through identifying strong policies, outcomes, development milestones and proposals to ensure the 2032 target of a 66% reduction is met.

The draft CCP is comprehensive and provides a very good overview of the current position, as well as identifying existing and anticipated challenges (including “Brexit”) and it details well the roadmap for achieving Scotland’s climate change targets. In addition, it is positive to see a refreshed focus on the importance of behaviour change initiatives, as well as how to better engage in conversation with the people of Scotland in respect of climate change, both of which will be fundamental in meeting targets, especially at local authority level.
Costs

There is very limited information within the draft CCP as to the costs of different policy outcomes and how they could be compared. Overall costs are expressed as a percentage of GDP over the period to 2050, with the current net present costs estimated to be 2% of cumulative GDP to 2050. It would be useful for the CCP to set out what the projected annual costs are likely to be in meeting targets up to 2032, with further detail as to how these costs are likely to be divided between central and local government, as well as between households and industry. It is therefore unclear what the likely costs of implementing measures in support of the CCP would currently be for local authorities – this information will be vital in allowing Councils to make fully informed investment decisions about finance, workforce and technical expertise over the coming years. However, it is clear that additional costs over and above current commitments will be difficult if not impossible to find, given the current financial situation and how this is likely to develop in the coming years.

Key Questions

1. Progress to date in cutting emissions within the sector(s) of interest and implementing the proposals and policies set out in RPP2.

The CCP is comprehensive, clearly setting out a pathway to meeting a 66% emissions reduction target by 2032. It does this through the identification of appropriate policies, policy development milestones and proposals, relevant to individual sectors, which will allow advance planning and measurement of progress. Given that Scotland met its 2020 target of achieving 42% reduction in emissions in 2014, the CCP is a logical step forward, setting out revised policies to help Scotland achieve the decarbonisation of its economy. It also addresses many of the significant challenges which lie ahead (given that many of the “quick wins” have now been achieved) in meeting the ambitious emissions reduction targets, including how to achieve meaningful behaviour change in the population, as well as support for the demonstration and commercialisation of new technologies such as Carbon Capture & Storage (CCS).

Many local authorities are well placed to help achieve the ambitious targets set out within the CCP, particularly in the electricity, residential, transport and land use sectors. Further, the CCP identifies flexibility in energy systems as one of its policy outcomes; this is welcomed. Matching generation with demand on a dynamic distribution system can be well implemented across the country, especially for those with electric heating. This could be important in reducing fuel poverty over the coming years.

2. Scale of reductions proposed within sector(s) and the appropriateness / effectiveness of the proposals and policies within RPP3 for meeting annual targets and contributing towards 2020 and 2050 targets.

Undoubtedly, the scale of reductions proposed within the CCP is ambitious, but necessarily so if Scotland is going to meet its 2050 targets. The report makes reference to multiple potential solutions, including Carbon Capture & Storage (CCS),
low carbon heat technologies, and the significant electrification of vehicles. There is a clear gap between where we are now, and the desired position come 2032. However, the pathway set out within the plan is clear in most instances, particularly in respect of the electricity and residential sectors. There needs to be recognition of differing baselines for each local authority area which can affect their ability to achieve a fair share of the targets, for example higher than average representation of high emissions industry and lower than average capacity for renewables development.

Significant reliance is placed on CCS in achieving a wholly decarbonised electricity sector by 2030. However, this technology is still very much in its infancy. In addition, the UK Government’s removal of £1bn worth of funding for a ground-breaking CCS project has hindered progress. To achieve targets, the plan recognises that there is an urgent need for strong inter-governmental collaboration to secure a demonstrator project in Scotland.

In order to achieve the levels of emissions reduction set out within the CCP, it will be important to empower local authorities to deliver locally appropriate solutions that support these high-level national ambitions, while providing adequate local flexibility. However, many of the policies and proposals set out in the plan, which could be delivered locally, will require significant capital investment, and there is very significant uncertainty about where this may come from. Subsidies and the level of support delivered by the Scottish Government to date has not been sufficient to achieve targets at the local level, let alone the more ambitious targets proposed in the CCP. If local authorities are expected to help deliver these targets, it is clear that more resources will be required.

As noted in the current consultations on Heat & Energy Efficiency Strategies, and Regulation of District Heating, the Scottish Government designated energy efficiency as a national infrastructure priority in June 2015, covering energy efficiency and heat decarbonisation of both domestic and non-domestic buildings. The current Scottish Government consultation on the future of the Scottish planning system, Places, People and Planning has as a key theme “Building more homes and delivering infrastructure” which includes proposals in respect of embedding an infrastructure first approach, a more transparent approach to funding infrastructure, and innovative infrastructure planning. These proposals signal a role for planning to consider the opportunities to plan strategically in locating new low carbon energy infrastructure and to target a roll out of energy efficiency measures (and raised in the current draft Energy Strategy consultations), in the context of an infrastructure first approach to development. However, the CCP only includes a basic cross-reference to the Places, People and Planning consultation at paragraph 5.2.6. Whilst it is appreciated that the final outcomes of the review of planning are not yet known, it would be helpful if the CCP displayed greater vision as to the future role of planning other than just working to established principles.

Finally on this question, under the proposals which contribute to the delivery of Policy Outcome 2 concerning charging points for electric vehicles, the role that Building Standards can play in helping to deliver this outcome is acknowledged.
However, in *Places, People and Planning*, reference is made to an independent study having recently found no evidence that any value was being added by the requirements of Section 72 of the Climate Change (Scotland) Act 2009 for new developments to install and operate low and zero-carbon generating technologies – instead, Building Standards are driving down emissions. Building Standards can therefore be an effective way of delivering change, and consideration should be given to whether more could be achieved by that route – for example, by adapting the approach to energy efficiency requirements for Building Standards, the consideration of district heat networks could be promoted to greater effect, where appropriate, as part of the solution.

3. Appropriateness of timescales over which proposals / policies within RPP3 are due to take effect.

As with any plan covering such lengthy timescales, there is a relatively high level of uncertainty as to whether these are appropriate. Many of the quick-wins in respect of reducing Scotland’s emissions have already been achieved, and therefore, it is reasonable to assume that the next phase of reductions will be more time consuming, and uncertain. This is particularly true of the residential sector, for example, where the ambition for the majority of homes in Scotland to be connected to low carbon and renewable heating systems by 2032 is starting from a very low baseline, and the target therefore appears to be optimistic, especially given the scale of investment which will be required to meet it.

For some authorities (particularly rural authorities off the gas grid) this target is considerably more challenging. Whilst planning policy ensures that new build properties meet various efficiency standards, a sizeable proportion of older housing will require significant levels of investment to heat them in a low carbon way. It is likely, therefore, that low carbon community heating networks will play an important role in meeting the 2032 target. This will, however, require considerable investment and high levels of engagement with communities.

4. Extent to which proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits (e.g. environmental, financial, health) from specific interventions in specific sectors.

It is refreshing that the draft CCP recognises that the ambitious targets set out within the plan as well as the Climate Change (Scotland) Act 2009 cannot be met simply through top-down directives and policy, and that public understanding, engagement and action will be vital in achieving the social and economic transformations required to achieve a truly low-carbon Scotland.

It is clear that there is no way to achieve the targets nor implement the far-reaching changes required without a high level of public consensus, and that transformational change can only be achieved through changing behaviours at a local and national level. Many of the policies and proposals detailed within the plan will require significant changes to the way we travel, how we power and heat our homes and offices, as well as a better understanding of how and what we purchase can feed in
to a circular economy. In many ways, these cultural shifts and changes in behaviour will require major infrastructure and technological improvements over the coming years, with the risk being that a lack of investment could stymie any good work in shifting behaviours and attitudes regarding climate change.

To this end, the ISM model will prove useful in identifying where the gaps are in respect of changing behaviours i.e. whether these are in the Individual (e.g. an individual’s values, attitudes and skills), Social (e.g. the influence of networks, relationships and social norms) or Material (e.g. infrastructure, technologies and regulations) realms, as well as where the quick-wins might come from. Many policies have specifically identified behaviour change initiatives within the associated delivery routes; using the ISM model across all relevant policy areas will undoubtedly support the implementation of policies and proposals outlined in the CCP.

Summary

The draft CCP is a welcome update on RPP2, and provides a well-structured pathway towards meeting the targets set out within the Climate Change (Scotland) Act 2009. However, from a local authority perspective, it is unclear what level of investment will be required to ultimately deliver the scale of emissions reductions proposed, and the various policy outcomes. The issue is particularly acute for rural authorities, where constraints such as lack of access to the gas grid, sparse, rural populations, and high energy costs which place many residents in fuel poverty, are very real challenges.

Local authorities, as “major players”, will be relied upon heavily and expected to lead from the front in terms of delivery the Scottish Government’s climate change targets. However, there is need for sufficient support and resources in order to deliver on commitments, particularly where these are more wide-reaching or ambitious than those local authorities have already committed to internally (for example, under Carbon Management Plans).

It would also be helpful if the Scottish Government could spell out sooner rather than later to what extent they expect Planning Authorities to be proactive in addressing opportunities and challenges through the planning system e.g. in the consideration of planning applications for the development of major growth areas that are coming forward for consideration, before Heat & Energy Efficiency Strategies have been prepared and district heating policy has been embedded into Development Plans.

We have concerns about the lack of a clear, coherent spatially based framework for the rollout of EV infrastructure, and a lack of clarity in terms of obligations for financial charging and maintenance of the network.

Finally, given the short consultation window, more time would be required to properly assess the likely impact on individual local authorities and whether the vision of the draft CCP is achievable, but there is broad support for the policies and proposals outlined.

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