Dear Committee Members

The Draft Climate Change Delivery Plan is a welcome document detailing how Scotland can strive towards significant emissions reductions across society. Much of what it contains has appeared in similar form in previous incarnations, which indicates that perhaps more of an onus is required on delivery and practical policy interventions to bring the necessary changes about, and less emphasis should be given to vague principles, which many observers accept but which do not, in and of themselves, deliver the necessary change.

In particular, the areas which the UKCCC themselves highlighted for further prioritisation are heat and buildings efficiency, transport (especially road emissions), and agriculture. More specific and more challenging recommendations in each of these arenas would therefore be particularly welcome.

The commitment to ultra-low vehicles is to be welcomed, as most visions of a low-carbon future require complete decarbonisation of the road traffic sector. However, the commitment does not go far enough. There are around 2.7 million road vehicles in Scotland, around 210,000 of which are newly registered each year. This suggests it would take 13 years to replace all vehicles with electric vehicles if 100% of new cars were electric. The proportion of new vehicles that require to be ultra-low emissions (and this should not include hybrids) in the current draft does not go far enough, and nor is there any indication of how Government will help to bring this about. Ideally we would see phasing out of non-electric vehicles by 2030. There is also an assumption that a 30% growth in road traffic is inevitable, rather than a plan of how to avoid this as undesirable. More of a commitment to traffic reduction measures, and incentives toward active and public transport, need to be significantly more evident. More onus on rail infrastructure (especially north of Edinburgh) and other public transport would be welcome in any future draft, and we would support calls for increased funding for active travel, to as much as 10% of transport budgets.

Further to discussions we have had with a wide number of stakeholders, we would also welcome specific nitrogen target limits, and concise action to tackle nitrogen emissions, which go beyond current commitments and would help to reduce overall agricultural emissions. And a greater focus on buildings efficiency and heat would add greatly to its credibility, though it is reasonable to assume some of this will be picked up within the Warm Homes Bill. However, this climate plan should provide some challenge and encouragement to the development of that bill, and we would
echo calls for all homes to reach at least an EPC band ‘C’ by 2025, helping to address both climate change and fuel poverty.

The proposals for renewable heating are welcome and exhibit real ambition; however, it is unclear how these ambitions will be met, and there is no real indication of the measures required to deliver them. Again, some clarity and detail about the actual proposals that can bring about this change would be welcome.

Overall, the plan is a helpful tool in steering action across the sectors, but it will require a good deal of promotion and effort to ensure local authorities, businesses and public bodies prioritise its implementation in the face of significant budget reductions. Alongside policy commitments and detail, a holistic and comprehensive plan of education and carbon literacy across sectors aimed at middle to senior managers and boards would support implementation, bolster uptake and greatly increase the chance of the Climate Change Delivery Plan’s adoption and success. There is also a need to challenge and pose the question of all sectors of Scottish society, not just central government, so there is a shared sense of ownership and a shared responsibility to deliver against the climate targets, and this type of universal training would help to underpin that approach.

This Delivery Plan can only be delivered successfully if all departments of government and all sectors of society play a role. This has not been evident to date and needs continued effort, and arguably sectoral targets and obligations, if it is to succeed.

Yours sincerely

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