The Aberdeen City Context

Aberdeen is a unique place in Scotland. Though the City has benefited from the prosperity brought by the oil and gas industry, now that the rest of the UK economy is recovering from recession, Aberdeen is experiencing a decline due to the drop in the price of oil. This is compounded by pressures on infrastructure, connectivity, housing and skills. The effects of this include job losses, falling property prices and loss of custom.

Despite this decline, Aberdeen City continues to make a significant exchequer contribution to Scotland and the UK and this is expected to continue into the future. At a Scottish level, for example, almost 8% of Non-Domestic Rates was raised within Aberdeen in 2015/16.

Through our Regional Economic Strategy the City / Region is continuing to support the oil & gas industry, but also taking a more sustainable, diversified approach by attracting non-oil business. The City Council is also leading the largest regeneration programme ever seen in Aberdeen to support vastly improved transport, connectivity and investment in the city centre.

Thank you for the opportunity to respond to the Draft Climate Change Plan (DCCP). It should be noted that we have had little time to gather views on this in order to meet the deadlines for giving evidence to the varying Scottish Parliament Committees. Therefore this response denotes views from a limited number of officers. Further feedback might have been collated from across differing Council services if more time was available; which may or may not have reflected different perspectives to those offered below.

Please note that corporate and city wide progress against Report on Policies and Proposals (RPP) 2 is illustrated within our latest Public Bodies Duties returns available through the Sustainable Scotland Network (SSN).

**Comments on the DCCP**

**General:**

- We note the significant developments that have taken place since the publication of RPP2 in particular the introduction of the use of the TIME model to both identify and evaluate the policy impacts. This will add value in understanding the impacts of different policy measures and allow progress to be more easily tracked.
- We are supportive of any measures that will help improve the health and wellbeing of citizens and attain national targets to reduce emissions. We
welcome the raised targets and holistic approach presented within RPP3 while 
recognising the challenges they also pose in times of greater austerity and limited 
public sector resource. There is a need to ensure such funding is available to 
local authorities and their partners on an evidence led basis, which ensures 
return on investment.

- We agree that local authorities should lead by example. However, many areas 
  addressed by the Climate Change Plan have not necessarily been part of the 
core skills within local authorities to date. There will be a need to support 
development of skills in the public sector as well as beyond to ensure there are 
enough of the right skilled people to fill the required jobs, etc. in order to meet the 
aspirations set out in the Plan. For some new technologies expertise has to be 
brought in from elsewhere. Training and upskilling is therefore essential across all 
sectors. Current training is often funded by existing developers which can restrict 
 further expansion.

- As Scottish climate change ambitions further increase, it is increasingly important 
  that to embed the key issues across all local and national government policies, 
strategies and decision making processes. There is otherwise a danger that it 
becomes a standalone Plan being viewed in isolation. Further, there is a 
requirement for a collaborative approach, moving away from silo working. This 
will require greater partnership working across all sectors, something which we 
currently strive to achieve.

- There is little cross reference within the DCCP to climate adaptation. Mitigation 
  and adaptation are inextricably linked and should work in tandem.

Related to the Economy, Jobs and Fair Work committee

- Much emphasis is placed upon Carbon Capture and Storage (CCS) meeting our 
  needs, with some of this infrastructure being in place by 2020. We consider this 
challenging unless met with major investment and support through the planning 
process. A recent and local example of the challenges can be seen where CCS 
 failing within Peterhead.

- While we support the principle of biomass, we have some concerns over biomass 
  types, provenance and production methods. For example, if biomass is being 
sourced out with Scotland, questions are raised about externalising emissions. If 
biomass is home grown, then what might be the implications for land use / food 
production? We appreciate this is an evolving field with various options. We 
therefore suggest that this agenda is given further scrutiny and very clear 
direction from Government in order to avoid unintended consequences which 
have the potential to negatively impact on other policy areas / sectors, i.e. food, 
forestry, biodiversity, etc.

- The DCCP has a significant focus upon ensuring energy efficiency through 
  improvements to building fabric, insulation, etc.; the importance of reducing 
demand within buildings and the home also needs to be considered within this 
area. The Scottish Government should also be encouraging the highest 
standards of new build such as passive house standards for example to 
encourage the construction sector to move beyond regulatory compliance and 
become more innovative in design in our buildings for the future.

- We very much support the move by the Scottish Government to make energy 
efficiency a national priority and the proposals around the expansion and 
development of Scotland’s Energy Efficiency Programme (SEEP). However, we
also note that there remain challenges in householders and small businesses in particular taking up energy efficiency measures even where grants, funds and schemes are available. Further work should be undertaken on understanding the barriers to uptake, better understanding householders and citizens’ views of energy efficiency to seek to find ways to overcome some of these barriers.

- Meeting the requirements of the DCCP could offer opportunities of market diversification and job creation. We would welcome such development, especially given the down turn in the oil industry. Such job creation could offer opportunities to utilise existing engineering knowledge and skills which could be applied to this market.

- As stated previously, there is concern over the availability of skilled labour to undertake the projects highlighted within the DCCP in light of other organisations trying to meet similar needs.

**Related to the Environment, Climate Change and Land Reform committee**

- We welcome technological advances which offer opportunities to address climate change. However, technology alone doesn’t always offer a complete solution. It’s important also that technology and associated instructions / operating systems communicate efficiently and effectively to the end user in order to secure the benefits offered.

- There is limited mention of the role of procurement and the implications of the Procurement Reform Act; of which sustainability and community benefits are part. Effective procurement of goods and services by a local authority can help to achieve the DCCP, assuming life cycle costing is considered correctly and the issues surrounding capital and subsequent impact on revenue budgets is recognised.

- There are few links within the DCCP which relate to open and green space. Development of such infrastructure can help fulfil many policies, plans and strategies including adaptation, ecosystem services, flooding, and resilience and supporting the work of the NHS to promote a healthier lifestyle and promoting wellbeing. In this regard, the DCCP should make reference to Local Outcome Improvement Plans and encourage further collaborative working in this area.

- Whilst the provision of funding streams is welcomed, short-term funding such as through the CCF often creates projects that aren’t sustainable as they cannot continue when funding ceases. Consideration should be given to ensuring funding models deliver long-term sustainable outcomes.

**Related to Local Government and Communities**

- The DCCP seeks to drive a reduction in overall emissions. However, one area adding pressure to achieving that outcome is the increase in the number of single occupancy homes. It’s not clear what the Plan will do to help address this conundrum.

- See previous comments relating to availability of contractors, building to greater energy efficiency standards and concerns over the complexities of applying for funding.

**Related to Rural Economy and Connectivity**

- Emissions from shipping and aviation only seem to be included on a voluntary basis. Given the cheap costs of flights, this is impacting on user choice whereby other [more sustainable] modes of transport tend to become secondary.
Consideration could be given to more stringent targets for these transport areas, thereby creating a more level field, while acknowledging the potential risks this could pose on the economic development of the region in light of the Air Passenger Tax reduction.

- In relation to transport management we believe that the use of smart technology will have an important role to play going forward. This will allow better traffic management opportunities for smarter working to negate the need to travel and improved management of assets such as street lighting.
- In support of the circular economy and industrial symbiosis programmes consideration should be given to developing & utilising transport options that are fuelled, in whole or part, by ‘waste’ material. Little mention is made of such approaches.
- In relation to the theme of agriculture, please see the previous comments relating to biomass. Careful consideration and decision making on land use and other policy areas is required by Government to avoid prime agricultural land for food growing being lost for biofuel production.
- There is the suggestion in the DCCP that farmers will be expected to undertake carbon auditing. Given that a changing climate may pose additional constraints to farmers, such as new pests, diseases and possibly the need for varying crops, etc., there is a risk that this may not be perceived as the immediate priority. Part of the Government’s forthcoming consultation on this should consider where the associated regulatory duties / powers are located and the resources available to deliver against them.
- There are several contentious issues not covered by the DCCP, including the impact of over consumption and meat production / consumption. It could be argued that these present further opportunities to address emissions reduction.

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