Local Government and Communities Committee

The Draft Climate Change Plan (RPP3)

Submission from South Lanarkshire Council

- **Progress to date in cutting emissions within the sector/sectors of interest and implementing the proposals and policies set out in the RPP2:-**

- The Report on Policies and Proposals approach provides a framework for Local Government to set longer-term carbon reduction targets. The Council has met annual carbon reduction levels as per RPP2. It is difficult to comment on the progress to date across all sectors from the information contained in the RPP3 as only a short summary is provided. It may be useful when the RPP3 document is published to link it to the full RPP2 progress report detailing emission reductions for each policy within each sector.

- **The scale of reductions proposed within their sector/s and appropriateness and effectiveness of the proposals and policies within the draft RPP3 for meeting the annual emissions targets and contributing towards the 2020 and 2050 targets:-**

- In general it would have been useful to provide proposed carbon reductions for each sectors’ draft policies and proposals. The document does touch on the new modeling system used for RPP3 however without more detailed information it is difficult to comment on the scale of the reductions proposed in meeting the 2020 and 2050 targets.

- The delivery of some of the policies and proposals, in both the ‘Planning’ and ‘Residential’ sections of the document, are dependent on the outcome of interlinked consultations which are open at the moment. It would be helpful to include a link and also summary table outlining the specific focus of all the respective consultations where it is anticipated they overlap, which would make it easier for respondents navigating the website and also when providing consultation feedback without having to duplicate comments.

  - Draft Onshore Wind Policy Statement (30th May 2017);
  - Scotland’s Energy Efficiency Programme (30th May 2017);
  - Local Heat and Energy Efficiency Strategies, and Regulation of District Heating (18th April 2017);
  - Draft Energy Strategy (30th May 2017);
  - Places, People and Planning: A consultation on the future of the Scottish planning system (4th April 2017). The planning review presents an opportunity to make changes to the way in which the planning system operates and could contribute towards the outcomes in the Climate Change Plan. It will be important, however, to ensure that the factors influencing the outcome of the review remain focused on the wider need to ensure that the planning system delivers growth
which reflects the need of communities and is sustainable; and are not overly influenced by a narrower, sector based focus on house-building.

**Residential Sector**

- The routemap for ‘Residential’ (Housing) and ‘Services’ (council buildings, etc.) is set out as pre-2025 focus on energy efficiency and post-2025 focus on decarbonising energy supply (low carbon heat technologies) – i.e. for these sectors the immediate focus remains as eliminating poor energy performance. There are two policy outcomes covering the fabric and heat supply issues and 7 policy mechanisms listed: of these, two are significant sources of funding and are subject to longer-term uncertainty: renewable heat incentive (no commitment beyond 2020/21) an ECO (substantially reduced following changes to the green deal). This is noted in the document but the potential impact is not discussed / quantified.

- In general, the document is too tenure neutral in discussing ‘Residential’. There is a known tenure gap between existing public and private sector housing in terms of housing energy performance. This is not acknowledged in the document, though it is noted that consultation that was postponed in 2015 re: minimum standards for energy efficiency in private sector housing is due to be brought forward in 2017 – this will be an important consultation.

- Two other mechanisms feature prominently in the ‘Residential’ chapter: Home Energy Efficiency Programme Scotland (HEEPS) and Scottish Energy Efficiency Programme (SEEP). These are both significant funding streams (HEEPS = £118m in 2017/18 and SEEP £0.5bn until 2020/21). However, there is no mention of the Scottish Government’s major commitment to new house building: More Homes Scotland announced in Feb 2016, committed £3billion 2016 – 2021 to deliver 50,000 new affordable homes; this is a significant omission.

**Planning Sector**

- The Council welcomes the draft Climate Change Plan’s recognition of the role played by the planning system in delivering the Government’s climate change targets. The decisions made by planning authorities on where new developments should be sited, through the development plan and development management systems, play a significant role in ensuring that the way in which people move between the places used for living, working and playing minimises impacts on the environment. Similarly, Planning’s role in ensuring that the right infrastructure is provide to facilitate the movement of goods and people, in as sustainable way as possible, is equally important.

- It is important, therefore, to ensure that the planning system has the means, in terms of both skills and resources, to deliver the required outcomes. In addition at the national, regional and local scale it is equally important to ensure that the land use planning system operates within a context which clearly spells out an integrated spatial strategy which acknowledges and takes account of the need to address the impacts of climate change.
• The document refers to existing guidance in the National Planning Framework and Scottish Planning policy regarding the provision of plug-in vehicle charging infrastructure in new developments. Whilst this guidance can be reflected in Local Development Plans the most effective means of ensuring this infrastructure is provided on a consistent and regular basis (within properties) would be to ensure, as suggested in the proposals contained in the Climate Change Plan, that the appropriate requirements are incorporated into the Energy Performance of Buildings Directive.

• Similarly, regarding on street charging points, it may be appropriate to consider how the Roads Construction Consent process could contribute towards securing the delivery of the required infrastructure.

• The appropriateness of the timescales over which the proposals and policies within the draft RPP3 are expected to take effect:-

• The timescales are reliant on changes in technology, infrastructure, and behaviour however the document does not fully detail how these changes will be financed and does not factor in the potential impacts of market resistance and political changes. Local Authorities have increasing pressure to make savings in this time of austerity, and in order to make the step changes required to meet the ambitious carbon reduction targets, significant investment would be required. These step changes need guaranteed accessible funding streams and to be incentivised.

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

From a Local Authority perspective the co-benefits outlined in each section of the document provides added weight to business cases prepared for carbon reduction action across Resources and Services. It may be useful to reference the source of any of the statistical and financial information provided in the co-benefits section.