Local Government and Communities Committee

The Draft Climate Change Plan (RPP3)

Submission from Stirling Council

General Comments

Publication of the draft Climate Change Plan (CCP) is to be welcomed. The new structure of the Plan provides a clearer format than previous Reports on Policies and Proposals and the level of ambition within it reflects the imperatives of climate change science.

While understanding of the projected impacts of climate change and the need to adapt to them remains poor, it could be seen as misleading – and certainly won’t help improve understanding – to call a plan whose purpose is carbon reduction a Climate Change Plan. For greater clarity, and to remove ongoing confusion of terms, we would suggest that RPP3 be titled Scotland’s Carbon Reduction Plan and that this, together with Scotland’s Climate Change Adaptation Plan, form Scotland’s Climate Change Plan.

The reference in the draft Plan to the co-benefits of carbon reduction policy is welcome especially as, to succeed, the Plan needs to resonate with and engage a wider range of organisations and professionals than those normally associated with climate policies.

Leadership

To match the aspirations of the draft Plan, there is a need to prioritise climate change leadership across all sectors. Without a recognition at senior management level of the importance of delivering carbon reductions, competing priorities are likely to direct resources to other areas, especially at a time of diminishing budgets. This is nowhere more important than in the public sector, which has a wider leadership role through its influence across all sectors of society. Ensuring climate change considerations (both mitigation and adaptation) and carbon literacy are made effective drivers of public sector leadership will be vital to success, not just of the Plan but of wider climate change aspirations.

Alignment

From the scale of ambition and range of policies and proposals being considered there is a clear need to align resources – financial, human, technical, time and built – to deliver the draft Plan. This may require scaling up specific funding streams directly targeting climate change activity, but also ensuring other investments (such
as City Deals) integrate carbon reduction requirements so the aspirations of the draft Plan can be delivered. In addition, funding mechanisms need on-going review and reform to implement this ambitious 15-year plan, which may require reform of what can be a rather fragmented and short-term funding landscape.

As time and resources are limited, there is also a need to work together to ensure a good strategic fit between the draft Plan and other public sector agendas, including public sector reform and innovation, and to improve vertical alignment between national, regional and local climate change policy across Scotland.

Service Sector

From Figure 15 on p 90 it can be seen that historical emissions from this new sector (non-domestic buildings in the public and commercial sectors) have remained virtually static during the last 24 years and were even lower in the 1990 baseline year than in 2014. While there is clearly an argument that the sector should do more than others that have already made significant savings, the fact that it has flat-lined for a quarter of a century perhaps underlines that this is a particularly difficult sector in which to make significant savings.

The sector envelopes in the Pathways to 2032 table on p 10 places ‘Services’ at 2.7 MtCO2e in 2017, equivalent to 6.3% of the total. Subsequent year projections indicate that a 52% emissions reduction in only 5 years (by 2022) and a 96% reduction in 14 years (by 2031) is expected from this sector. This is initially dependent on ramping up action on energy efficiency and then will be reliant on new technologies becoming more widely available, reliable, adopted and implemented, combined with a significant move away from gas heating. Installation of gas back-up boilers, with an engine life to 2032, are the current choice as alternatives to gas are too expensive to support business cases.

Significant concerns have been raised as to how these projections relate to the current reality in the public sector. Concerns include the ability to scale up the pace of action on energy efficiency measures, the availability of appropriate technology, the barriers to project implementation, and the need to take a system-wide view on how to implement the changes envisaged.

Far from pleading a special case, officers have been working hard within a range of constraints, some of which have already been outlined, to deliver reductions in line with national targets. To date, Stirling Council has made good progress: from a 2006/07 baseline, emissions from our estate had reduced by 25% by 2015-16 and by 27% from our buildings; we met our 20% reduction target in 2015 and have adopted targets of 40% reduction by 2021 and 80% by 2050. The projections in the draft Plan have however left staff feeling demoralised.
Given that this sector is one of the smallest, combined with the Council’s corporate emissions only making up around 3% of those from the Council area, such stringent cuts will have a limited impact on the total. The Council would therefore be grateful for clarification from Scottish Government as to how and why these emissions reductions were calculated and, more importantly, how they are expected to be made?

**Wider issues**

**District Heating** – Installation of supporting infrastructure should be made mandatory in all new developments to ensure the draft Plan’s level of the ambition can be met.

**Emissions Factors** – As de-carbonisation of the grid continues at a faster pace than the rest of the UK there needs to be a way to capture this in Public Bodies Climate Change Duties mandatory reporting.

**Green Infrastructure**, especially in urban areas, has significant co-benefits for health, flooding and climate adaptation and should be recognised in the Plan. Articulating such benefits will help counter the view held in some quarters that urban trees are a liability rather than an asset. Woodland planting in upland areas (that avoids carbon-rich soils) can also play an increasingly significant role in reducing floods as the climate becomes significantly wetter, with an associated increase in frequency and intensity of cloud bursts.

**Grid connection** of locally generated energy needs to be both simplified and the cost reduced to ensure the draft Plan’s level of the ambition can be met.

**Planning Policy** - While there continue to be numerous competing demands for developments to proceed then statutory considerations tend to prevail. Embedding the imperatives of climate change and carbon reduction will require a much higher profile in National Planning Policy.

**Monitoring**

The commitment to improve monitoring of the draft Plan and to align with the Public Bodies Climate Change Duties mandatory reporting is welcome. In particular, the voluntary ‘wider influence’ reporting data could be improved and used to better link public sector reporting with draft Plan monitoring.

There is an assumption (laid out in Text box 3-1 on p15) that mandatory reporting is not only “providing a solid basis for tracking public sector action on climate change” but that it is also “driving continuous improvement” and that this is then “helping improve leadership and engagement, raising awareness of the impact of climate...
change with senior management, ensuring climate change objectives are integrated in corporate business plans and action embedded across all departments”.

Whilst the introduction of mandatory reporting has undoubtedly provided a method for tracking public sector action on climate change, the current structure and format of reports does little to engage a wider audience such that the aspirations outlined in these statements can be realised.