

Climate Change Plan call for views: summary of responses for the Electricity sector

The Net Zero, Energy and Transport Committee ran a proactive [Call for Views on the forthcoming Draft Climate Change Plan \(CCP\)](#) from 27 June to 19 September 2025. This SPICe briefing highlights key electricity sector issues raised by respondents. It is not intended to be a comprehensive summary, but a brief overview of key issues raised. Full responses are published on the Scottish Parliament website: [Published responses for Draft Climate Change Plan Scrutiny 2025 - Scottish Parliament - Citizen Space](#).

A table of acronyms used to refer to the organisations that submitted responses is included at the end of the document.¹

What are the most important policies needed to achieve the proposed carbon budgets?

The most frequently cited policy was for upgrades to the electricity network (SCCS, EDC, CEP, BHHPA, HC, RMT, RCPE, CS, HES, ACC, FOES, UKERC). CS highlight that as the electricity network has not “expanded in parallel” to renewables, there have been “substantial increases in balancing and constraint costs”. SWA highlighted the importance to them of “grid readiness” and that warehouses and storage sites “will need reliable, high-capacity power to support electric heavy goods vehicles (HGVs) and charging infrastructure”.

There was some support for a general increase in the amount of renewable electricity generations assets (SCCS, CCAN, SEPA, HC, HES, CreScot, FOES, PS). Specific renewable technologies identified as worthy of support included offshore wind (CEP, EMEC), onshore wind (ACC), solar (SCCS, ACC), hydrogen production (CEP, HC, ACC, HES), pumped hydroelectricity (HC, individual) and long duration energy storage more generally (GCC). EMEC set out their desire for policy supporting marine renewables i.e. tidal, wave etc. While NECCUS were supportive of policies for carbon capture and storage (CCS), support for this technology was opposed by SCCS. UKERC see the key policies for the Scottish Government as being acceleration of the consenting process for grid infrastructure and generation assets.

In order to achieve the necessary grid upgrades CISC argued:

“...evidence from Skills Development Scotland around economic opportunities for Scotland indicates the critical need for skilled workers in fields including Energy Distribution and Transmission, Electrical and Mechanical Engineering,

¹ Note: The table includes all organisations that submitted a response to the Call for Views. However, not all organisations responded to every section, and not all acronyms appear in each briefing.

and Offshore Energy, and therefore a significant increase in the number of Modern Apprenticeships will be required”.

Overall, a low carbon electricity system was seen as a means of allowing public bodies to fulfil their statutory obligations (SPT, NHS Lothian).

RCPE highlighted that electrification is “a key enabler of decarbonisation in other sectors”. The RMT highlighted their support for further rail electrification. Beyond specific technologies several respondents highlighted the importance of policy that worked to reduce the cost of electricity (CCAN, CreScot, SSN). Some respondents wanted “the low cost of renewable generated electricity to be passed on to users” (EDC) and for electricity costs to be “de-coupled” from that of gas (SLC). CXC [highlighted a report](#) that they had commissioned on the electricity market reform.

PHS and RCPE highlighted various health benefits (via a report from [the UK Health Security Agency](#)) that could arise from decarbonised electricity – “cleaner air” and “warmer homes” – and that the CCP should contribute to Scotland’s Population Health Framework, and Health and Special Care Service Renewable Framework.

There were calls for electricity infrastructure that was resilient to the consequences of climate change (ACC, HC). Policies supporting community ownership of energy generation infrastructure were advocated for by several respondents (SCCS, ACC, GCC, HC, RCPE, FOES, two individuals).

Some policy suggestions related to demand for electricity, and specifically those which would enable electricity demand reduction. It is worth noting that some of these could be categorised as policies for other sectors. These included demand reduction in Buildings and Transport (EDC) and general calls for demand management (NS, RCPE, FOES). Alongside this, there were calls for policies supporting demand flexibility as a means of reducing the need for new electricity infrastructure (NS, CS, HC) and reducing curtailment of renewable generation.

Some highlighted the potential for increased electricity demands in the future from electrified transport and heating, as well as the electricity demands of artificial intelligence (NS). SPT highlighted the potential for public transport and active travel to reduce future electrified transport demands.

The potential economic benefits of electricity decarbonisation and renewables policy were highlighted by HC. Policy that phases out fossil use was raised by several respondents (SCCS, SLC, PHS, RCPE).

IPPR Scotland pointed out that so far emission savings in Scotland have:

“...been achieved primarily through one route: closing fossil (mainly coal) fuelled power stations and replacing their electricity with renewables.’ and that as a result this CCP will focus less on the Electricity sector and more on ‘changes made much closer to far more people’s daily lived experience”.

When should these policies be introduced, and over what timeframe should they be implemented?

As might be expected, the most common response was that the suggested policies should be adopted as soon as is possible. NECCUS suggested that prioritising net zero policies could enable “first mover benefits”. UKERC highlighted that the development of the necessary supply chains was key and would require “early work” from government.

A detailed timeline was provided by the CEP with coverage between now and 2040. The RCPE and HC also included detailed timeline for when change should occur.

Some respondents (ACC, PHS) pointed to the timeframes set out in the Climate Change Committee’s (CCC’s) advice on Scottish carbon budgets.

What are the expected costs of implementing these policies?

Many responses highlighted that there would be significant upfront costs. The vast majority of these went on to highlight that the costs of dealing with the impacts of climate change would be much more significant than the upfront costs of taking action. Some respondents pointed to the work of the CCC (SCCS, RCPE, PHS) as being a source of information on the costs of decarbonisation.

Figures for the costs involved with electricity grid upgrades came from the CEP: £22-32bn for transmission network upgrades in Scotland and potentially £40bn annually 2025-30 for offshore wind. EMEC also offer figures: £20m for a tidal site expansion and £80m for a national floating wind test centre. ABCA point out that the electrification of heat and transport will require investment in the electricity grid.

FOES make [reference to the work](#) on costs of emission reductions done by the Scottish Fiscal Commission. ClimateXChange state that some of their reports consider costs but that “cost is not routinely part of the research ask we get from the Scottish Government”.

What are the expected benefits of these policies?

One benefit regularly highlighted, was, of course, the carbon savings (SCCS, ACC, FOES, CCAN, HC, FOES). The lower cost of renewables was also highlighted as a benefit by some (EDC, CreScot RCPE, FOES). The potential to reduce fuel poverty was also cited (GCC, SLC, StC). UKERC suggested low carbon electricity could be lower cost, but in the long term.

The move to renewable electricity was highlighted as allowing the avoidance of fossil fuel price spikes (EDC, BHHPA) and as providing energy security (CEP, SLC, CS). This was framed as “future-proofing” by CCAN.

Job creation was raised from both the deployment of renewables (CEP, ACC, SLC, HC) but also associated hydrogen production (ACC). The potential wider economic benefits of possibly exporting hydrogen were also raised (CEP, EMEC).

Health benefits from cleaner air were highlighted by various respondents (CEP, ACC, NS, SLC, PHS, HC, StC, RCPE, SPT, UKERC, FOES). PHS and RCPE go into some detail on the health benefits; from more frequent adverse weather events, reduced air pollution and more affordable electricity addressing fuel poverty. PHS highlight that health impacts “cannot be assumed from the policies, actions must be well designed”. ClimateXChange highlight that [the reports they commission](#) “identify a range of benefits”.

What do you think the key challenges would be in delivering these policies?

One of the most common challenges raised was that of opposition to the policy of net zero itself (SCCS, RCPE, GCC, RCPE, CCAN, FOES). To address this, some respondents suggested that the perceived benefits of transition should be better communicated (SCCS, UKERC, FOES). UKERC highlighted opposition to new electricity lines and CCAN to new wind farm projects. RCPE highlighted general NIMBYism. CreScot said that there needed to be political will, while RCPE said that there had been a degree of political short-termism.

Grid constraints or the “mismatch between renewable deployment and delivery of grid infrastructure” (CEP) was highlighted by multiple respondents (EMEC, ABCA, HC, SPT). For ABCA this meant local grid upgrade costs being passed to the costs of housing developments and this presenting a challenge for the cost of affordable housing. IPPR Scotland set out that “a suburban household may need to wait for their local electricity network to be upgraded before they can install an EV charger and a heat pump”.

The relatively high cost of electricity was identified as a challenge by multiple respondents (EDC, BHHPA, NECCUS, CS, UKERC) and that there is a need to reform electricity markets (PHS). NECCUS raised the prospect of industry re-locating if prices remain high. UKERC set out that conversion to heat pump powered heat networks was challenging due to the potentially higher cost of heating. CS reiterated their views on the need for greater demand flexibility awareness and take-up.

The upfront costs involved with transition were identified by some (ABCA, HC) and that public funding would be needed in some areas (CreScot, NECCUS).

The long length of time the new projects take in consenting and planning was raised by several respondents (EMEC, CEP, PHS, ACC). CEP highlighted a fall in the number of local authority planning staff in recent years (“a 20% reduction in staff since 2011”) and GCC also raised concerns around the capacity of local authorities to support delivery. HES put forward that there was also increased pressure on statutory consultees such as themselves. NS raised the increased demand on their resources in recent years, that Habitats Regulation Appraisal is complex, and that it is important to have the right information at the right time in scoping and pre-application. EMEC suggested that the planning process is designed for large projects and not smaller marine ones.

Wider skills shortage and supply chain challenges were highlighted by CCAN and HC. EMEC also raised a lack of testing facilities for new technologies and a lack of routes to market, aside from the contract for difference scheme.

The complex split of devolved and reserved powers in climate policy was raised as a challenge by some (GCC, PHS). PHS raised the need to balance urgency with fairness as a challenge, with RCPE also raising the need for a just transition. The need for meaningful community engagement was highlighted by PHS and HC.

The challenges that are presented by actual climate change impacts were raised by HC and RCPE. Alongside this, RCPE highlighted increased electricity demand and national security threats. RCPE raised the potential for environmental risks from major low carbon project developments and HES highlighted the potential risk to the historic environment.

SEPA made a specific point about the potential for the electrification of industry to undermine the level of waste heat for heat networks. UKERC raised the prospect of renewables being less economically competitive if the gas price falls.

How could these policies support a Just Transition for workers and communities?

Many respondents highlighted the need for skills and retraining (CEP, ACC, CCAN, SLC, HC, PHS, RCPE, NECCUS, ABCA, FOES, individuals), with some highlighting those in the oil and gas industry (CEP, ACC, an individual). Others asserted that the transition would create new jobs (ACC, CCAN, ABCA, SLC). EMEC gave examples of the local economic benefits they were associated with on Orkney. The need for some just transition 'hubs' was highlighted by PHS and RCPE as a means of ensuring that the workforce demands were coordinated with supply. ACC raised the prospect of more funding going to the regions most impacted by the transition. CEP gave the example of the Sullom Voe oil terminal and its prospects of a low carbon transition.

Some respondents stated that community, co-operative, or local ownership models should be used as a means of enabling a more just transition (GCC, CEP, RCPE, FOES). Others believed that priority should be given to local businesses (SLC) or that there should be local content requirements in low carbon projects (CEP). The RMT asserted that a planned transition "can only be achieved through sectoral collective bargaining."

Several respondents highlighted the issue of fuel or energy poverty in their response and that addressing this is something that should be incorporated in a just transition (BHHPA, RCPE, SLC). PHS raised the links between economic inequality and health inequality and put forward the prospect of a low carbon transition being a means of addressing these issues. The potential health benefits of the transition were highlighted by StC, PHS and an individual response. CS suggested that many low carbon technologies should have lower running costs and would make the population more resilient against price shocks in international gas markets.

Various respondents (as in responses to other questions in this sector) highlighted the need for lower energy costs (GCC, HC, EDC, PHS).

HC highlighted the need to consider the implications for rural populations specifically, with SPT suggesting that better public transport options can benefit rural communities.

NECCUS asserted that a “competitive low carbon industry... will protect existing job within many sectors’ and eventually also result in the opportunity for export of products and skills”.

BHHPA (as in their response to other questions) highlighted that residents in holiday parks were paying non-domestic prices for electricity (as opposed to the prices paid by ordinary domestic households) and that this system should be changed.

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Table of acronyms used to refer to organisations

Acronym	Full form of respondent
C2050	2050 Climate Group
ABCA	Anderson Bell & Christie Architects
ACC	Aberdeen City Council
AGS	Auditor General for Scotland
ALLIANCE	Health and Social Care Alliance Scotland
BE-ST	Built Environment Smarter Transformation
BEFS	Built Environment Forum Scotland
BHHPA	British Holiday & Home Parks Association
CCAN	Cardross Climate Action Network
No acronym used	Climate Cafe Shetland
CEP	Centre for Energy Policy, University of Strathclyde
CERG	Climate Emergency Response Group
CIAT	Chartered Institute of Architectural Technologists
CITB	Construction Industry Training Board
No acronym used	Colleges Scotland
CreScot	Creative Scotland
CS	Consumer Scotland
No acronym used	Culture for Climate Scotland
CXC	ClimateXChange
No acronym used	Cycling UK
No acronym used	Edinburgh Communities Climate Action Network
EDC	East Dunbartonshire Council
EHA	Existing Homes Alliance
EMEC	European Marine Energy Centre
EST	Energy Saving Trust
FDFS	Food and Drink Federation Scotland
FES	Future Economy Scotland
FOES	Friends of the Earth Scotland
GCC	Glasgow City Council
GGM	Get Glasgow Moving
HC	Highland Council
HES	Historic Environment Scotland
HfS	Homes for Scotland
IKEA	IKEA Ltd
IPPR Scotland	Institute for Public Policy Research Scotland
No acronym used	Liquid Gas UK

No acronym used	Logistics UK
RESPECT project	LUNZ Hub RESPECT Project
MCS	The MCS Foundation
NECCUS	North East Carbon Capture Utilisation and Storage
NESTRANS	Nestrans (Regional Transport Partnership for Aberdeen City & Aberdeenshire)
NHS Lothian	National Health Scotland Lothian
NFUS	National Farmers Union Scotland
NS	NatureScot
No acronym used	Nourish Scotland
No acronym used	Orkney Islands Council
No acronym used	Paths for All
No acronym used	Peat-free Partnership Scotland Advocacy Group
PHS	Public Health Scotland
No acronym used	Perth and Kinross Council
No acronym used	Propertymark
PS	Police Scotland
QS	Quakers in Scotland
QMS	Quality Meat Scotland
RCPE	Royal College of Physicians Edinburgh: Air Pollution Working Group and Climate Café
RICS	Royal Institution of Chartered Surveyors
RMT	National Union of Rail, Maritime and Transport Workers
RSPB Scotland	Royal Society for the Protection of Birds Scotland
SAP	Scottish Agroecology Partnership
SC	Scottish Care
SCCS	Stop Climate Chaos Scotland
SE	Scotland Excel
SCIS	Scottish Climate Intelligence Service
SEDA	Scottish Ecological Design Association
SEPA	Scottish Environment Protection Agency
SEStran	South East Scotland Transport Partnership
SF	Stockfree Farming
SLC	South Lanarkshire Council
SPT	Strathclyde Partnership for Transport
SRAEHL	Scottish Research Alliance for Energy, Homes and Livelihoods
No acronym used	Seafood Scotland
SSN	Sustainable Scotland Network

StC	Stirling Council
SuSc	Sustrans Scotland
SWA	Scottish Wholesale Association
TACTRAN	Tayside and Central Scotland Transport Partnership
No acronym used	Transform Scotland
UKERC	UK Energy Research Centre
UoGSoL	University of Glasgow, School of Law
UWE Bristol	University of the West of England Bristol
WWF Scotland	World Wide Fund for Nature Scotland