



Stop Climate Chaos Scotland

Written evidence to the Local Government and Regeneration Committee on the Draft Report on Proposals and Policies (RPP2)

“The Parliament and the Government have won plaudits for setting ambitious climate change targets. It is right to be ambitious, and that places a responsibility on us to live up to our ambitions and meet the targets.”

Nicola Sturgeon MSP, 7th November 2012

Introduction

Stop Climate Chaos Scotland (SCCS) welcomes the opportunity to provide evidence to the Local Government and Regeneration Committee on the Draft Report on Proposals and Policies (RPP2). In the evidence below, SCCS sets out why **the current draft does not provide a credible plan** for fulfilling the requirements of the Climate Change (Scotland) Act 2009 and highlights those areas which require the greatest attention.

The draft RPP2 has been published at a time of heightened awareness of the urgency with which we must tackle climate change. Recent reports from the World Bankⁱ, World Economic Forumⁱⁱ, International Energy Agencyⁱⁱⁱ and UNEP^{iv} have all highlighted how the high carbon emission trajectory we are currently pursuing will result in dangerous climate change. These authoritative accounts of the urgency for action are matched by record Arctic ice melt^v in 2012, the hottest decade on record for global temperatures^{vi}, and a growing body of evidence linking extreme weather events to climate change^{vii}.

Although Scotland has the strongest climate legislation in the world, it is not alone in rising to the challenge of tackling climate change. An assessment by Globe International showed that 32 out of 33 surveyed developed economies have progressed or are progressing significant climate and/or energy-related legislation^{viii}. Christiana Figueres, the Executive Secretary of the UN Framework Convention on Climate Change (UNFCCC)^{ix} has emphasized the importance of national legislation, saying “nothing is going to be agreed internationally until enough is legislated for domestically.” **It is therefore essential that Scotland has credible plans in place to deliver on its world-leading climate change legislation.**

In 2012, as the second RPP was being developed, SCCS set out three criteria^x for the plan to provide the necessary confidence that future annual targets will be met: **credibility, transparency and ambition**. In this evidence, we have assessed the extent to which the draft RPP2 meets these criteria and then provided answers to the Committees questions relating to local government action, planning and communities.

Summary

- There is an overreliance on proposals over policies, as well as on the EU increasing its climate change target. Unless all proposals described are fully implemented and the EU changes its level of ambition, Scotland will meet just one annual target between now and 2027.
- There is a lack of transparency in order to inform independent assessment of these plans.
- Emissions abatement potential is unexplained and potentially overstated in some cases.
- There is a lack of monitoring of existing policies in order to assess whether emissions savings are being made at the level forecast in RPP1.
- Milestones should be included in the plans in order to facilitate future monitoring and evaluation of policies.
- There is a need to integrate a strategic approach to low carbon behaviour change in policies and proposals.

Transparency and readability of report

Rather than providing greater transparency of data, the **draft RPP2 provides less information than the first RPP**. It no longer distinguishes between UK, EU and Scottish policies as clearly as did previously, nor does it provide estimates of costs for proposals as the original report did. **This lack of information will frustrate future attempts to scrutinise the budget against the requirements of RPP**. In a number of cases, proposals are described in vague catch-all terms such as ‘Lower emissions potential in transport’, but no explanation is provided as to what this proposal would mean in practice. This has the effect of attributing significant carbon savings to poorly defined statements of possible future activities.

Unfortunately the draft RPP2 does not provide a full account of the benefits to be secured from its delivery. Although there is a figure provided for financial benefits it does not account for benefits from, for example, improved air quality, a

healthier population or reduced congestion. As a result, it provides only a partial account of the balance of costs and benefits, an area highlighted as important by Audit Scotland in their report from December 2011^{xi}.

In addition, unlike the first RPP, RPP2 also does not contain percentage reductions per sector compared to the 1990 baseline which makes it difficult to analyse the level of savings being attributed to meetings targets.

Credibility of plans

SCCS is concerned that **RPP2 does not present a credible package of measures** to enable emissions targets to be met. As with RPP1, there remains a significant overreliance on both the EU raising its ambition and the full implementation of a large number of proposals. For instance, in 2020, 41% of savings from the homes and communities sector is to come from proposals, for transport the figure is just over 30%. This balance of effort between committed policies and ‘propositions’ (para 2.11.2 of RPP2) does not provide a blueprint to a low carbon economy.

The table below is based on data from RPP2 and show how **only one target will be achieved if the Scottish Government implements only policies**. Even if the EU raises its ambition, all proposals would have to be implemented to the levels described if all of the legally-binding emissions targets are to be achieved.

EU shifts to 30%	Yes	Yes	No	No
All proposals implemented	Yes	No	Yes	No
All policies implemented	Yes	Yes	Yes	Yes
Outcome for annual targets 2013-2027	Hit all 15 targets	Hit seven targets (2013-19) and miss eight (2020-27)	Hit eight targets (2013, 2021-27) and miss seven (2014-20)	Hit only one target (2013)

Credibility is further undermined by a lack of detail regarding certain proposals that are expected to generate considerable savings beyond 2020. For instance, one transport ‘proposal’, Lower Emission Potential in Transport, does not start to contribute savings until 2025 and by 2027 is saving almost the same as the entire decarbonising vehicles agenda. The risk associated with reliance on possible future activity is compounded by the vague description of future action. The proposal simply refers to ‘a range of models used to predict transport emissions suggest that it may be possible to reduced predicted emissions, perhaps by as much as 0.75 Mt by 2027.’ There is no information to allow an informed interpretation of how likely this is or what steps need to be taken now to ensure it is realised.

RPP2 provides little evidence of the effectiveness of existing policies and as a result the Committee does not have the information needed to judge the credibility of emissions reductions attributed to different policies.

Ambition

It is hard to identify an increase in policy effort in RPP2. Certainly the ‘step change’ in effort advised by the UK CCC^{xii} is not apparent. For instance, the transport sector plans to achieve only 65% of the savings RPP1 set out to make; an actual reduction in policy effort rather than an increase. This is reinforced by the absence of *any* Scottish Government transport policies. By its own definition any current Scottish Government transport effort with a focus on emissions reduction is not currently happening at a ‘the intensity required for the abatement figures in this document’ (P124 of draft RPP2). The low level of ambition is compounded by the reliance on action after 2020. Again, the transport sector provides a clear example with three times the emissions reductions expected between 2021 and 2027 as between 2013 and 2020.

Local Government action to reduce emissions

Councils in Scotland contribute to climate change mitigation and adaptation work in a range of ways, some of which are being covered by the other committees considering RPP2, such as energy efficiency, housing and transport. In this evidence, SCCS is concentrating on the overall contribution and role of local authorities, all of whom are subject to the public bodies duties in Part 4 of the Climate Change (Scotland) Act 2009.

Progress on RPP1

Local authorities are key players in a number of ongoing and new policies at Scottish, UK and EU level, and many are doing excellent work in specific areas. However, it is not easy to make an overall assessment of progress across their full remit and their duties under the Scottish Climate Change Act due to lack of consistent data on activities and emissions savings. All 32 local authorities voluntarily report on their climate change work as part of their commitment to Scotland’s Climate Change Declaration (SCCD) and an analysis of the 2010-11 reports was published in March 2012^{xiii}. The analysis noted ‘a

high degree of variation in the way baseline data and progress against targets are currently presented and reported.’ This makes monitoring of progress in the sector difficult. SCCS calls on the Committee to **recommend that the Scottish Government uses its powers under part 4 of the Climate Change (Scotland) Act 2009 to bring in mandatory annual reporting for public bodies** and to introduce proper scrutiny of those reports.

Overall, it is clear that there has not been sufficient progress to date, reflected in comments in RPP2 such as the need for an ‘accelerated programme of implementation’, to ‘ramp up emissions reductions’ and a ‘significant uplift of activity’ across the public sector. However, SCCS is concerned that plans set out in RPP2 do not reflect this ambition to rapidly and significantly increase emissions reductions from the public sector. We discuss this in more detail in the section below.

RPP2

RPP2 recognises the importance of reducing emissions from public sector buildings through a range of proposals and policies targeting energy and energy efficiency. However, SCCS is concerned that considerable emissions abatement is attributed to a policy named ‘Public Sector’ with an ambition to achieve, by 2027, ‘a complete transformation in the way Scottish public bodies work’ (para 6.2). It states that this will be achieved through implementing and going beyond existing management plans; sustainable procurement processes; and supporting governance arrangements. Below we consider these in turn in relation to the measures set out in RPP2:

i) implementing and going beyond existing management plans

In order to go beyond activity which is already happening or planned, **RPP2 needs to identify and deliver new policies to reduce emissions from this sector**. Considerable abatement is attributed to ‘Public Sector’, described as ‘accelerating implementation of action identified in existing Carbon Management Plans, and later move to more ambitious activity’ (para 6.5.6). Measures already identified account for just 30% of the feasible additional abatement in the public sector between now and 2027-30 (para 6.5.7), meaning more effort is needed. RPP2 should set out specific new policies which will enable this significant additional abatement to be achieved. **SCCS recommends the Committee seek more information on this proposal.**

There is a considerable importance placed on behavioural change to reduce public sector emissions^{xiv}. Therefore the Public Sector proposal, as with many policies and proposals within RPP2, needs to be more explicitly linked to the section of RPP2 on behaviour change and the forthcoming Behaviours Framework.

ii) sustainable procurement processes

While **sustainable procurement processes are one of the three areas identified to achieve the ‘complete transformation’** referred to above, there are no proposals or policies relating to sustainable public procurement within the RPP2. The Carbon Trust’s report^{xv} identifies procurement as one of the five key barriers to implementing carbon-savings measures within the public sector.

The focus of what was to be the Sustainable Procurement Bill has shifted towards general Procurement Reform, with very little emphasis on sustainability. **It is difficult to understand how procurement will play such an important role in reducing Scotland’s emissions without considerable focus on this within the Procurement Reform Bill.** SCCS has expressed our concern about this in greater detail in our consultation response^{xvi}.

iii) supporting governance arrangements

The Carbon Trust report^{xvii} also noted as a significant barrier to implementation, that: “senior leadership is not sufficiently engaged and incentivised to make carbon reduction an organisational priority in public sector bodies”. As highlighted earlier in this evidence, SCCS has repeatedly highlighted concerns on monitoring of existing measures.

The costs and benefits for RPP2 are cited as £1.6 billion (1% of GDP) and £1.2 billion, although it is acknowledged that ‘the benefits cited are solely calculated on the basis of potential fuel and energy savings and do not include additional benefits in terms of, for example, improved air quality or biodiversity conservation’. While SCCS welcomes the attempt to quantify the benefits of measures to reduce emissions, without the inclusion of additional benefits like improved health through improved air quality and the subsequent financial savings to health services, it is too crude a measure to be useful and cannot inform decision-makers of the actual value of taking action.

As James Curran, Chief Executive of SEPA, pointed out during the RACCE Committee roundtable on RPP2 on 6th February: “The whole programme of RPP2 is costed at £1.6 billion and the benefits are noted as £1.2 billion, which seems to me to be completely unfair...it is not capturing many, very significant multiple benefits, which society in Scotland would want to pursue anyway.” **SCCS calls on the Committee to recommend a new policy be included in RPP2 which trains senior**

managers, local councillors and other relevant public sector staff to understand the business case for action to reduce emissions.

SCCS welcomes the promise within RPP2 of a clear plan of action by October 2013 for the public sector, including looking at mandatory reporting on emissions reductions and what more might be done through procurement activities.

The role of planning to reduce emissions

The level of cultural change required if Scotland is to meet our challenging targets to reduce emissions by 42% by 2020 and 80% by 2050, will need all parts of Scottish society – from Government down to individuals – to play their part. Planning policy has long-term implications for lifestyles in Scotland. Most planning decisions that are taken now are likely remain for decades to come, certainly within the timeframe of RPP2 and have significant impacts on the sort of country we will be living in by 2027. Building more roads, potential airport expansion and building out of town shopping centres are likely to increase emissions by encouraging high carbon behaviours, whereas low carbon homes sited near workplace hubs with good public transport facilities can promote low carbon behaviours. The success of measures set out in RPP2 are highly dependent upon behavioural change in this respect and planning has a key role to play in securing the material context for this behavioural change to take place (see para 3.5.6).

Planning features in RPP2 as one of the five cross-cutting themes of transformation (chapter 3). The RPP2 recognises that ‘Planning will support emissions reduction in sectors such as energy, transport, heat and waste and is often a critical enabling measure’ (para 3.6.2), and Scottish Planning Policy is identified as a supportive and enabling measure within the transport chapter of the report (para 7.5.1). Government is currently reviewing Scottish Planning Policy and the National Planning Framework and these documents will set out how policies can ‘further assist in delivering emissions reduction in support of our annual targets’ (para 3.6.2 of RPP2), and influence ‘location, density and form of development to make access by public transport and active travel easier and reduce travel demand’(para 7.5.1).

The existing SPP and NPF include positive policies on how planning should help deliver climate change goals. However, it is essential that planning authorities are able to demonstrate what action they are taking to help reduce emissions.

Planning authorities should be required to produce a statement setting out how the implementation of development plans and planning consent for major planning applications would result in a net reduction in emissions in the development plan area and contribute to the reduction of emissions across Scotland. In some instances, an increase in emissions may be inevitable. However, in these circumstances the decision must demonstrate how overall national emissions reductions would be delivered through alternative means. We look forward to seeing how these documents read across to the plans set out in RPP2, particularly with reference to reducing travel emissions.

An excellent example of good planning helping to reduce emissions can be found in Freiburg, Germany, where a brownfield site was transformed to a low carbon district, with 2,000 low-energy homes in parking-free residential streets where car ownership and use are half that seen in a comparable reference district^{xviii}. Scottish Planning Policy should be developed to prioritise these sorts of development.

Communities

‘The Homes and Communities chapter of RPP2 is focused on delivering home energy efficiency which is a critical focus for reducing Scotland’s emissions. However, there is a lack of strategic focus within the RPP2 on the important role which communities across Scotland play in reducing emissions, including those funded through the Climate Challenge Fund. The RPP2 needs to deliver a wider spectrum of changes across homes and communities. See, for instance, the ‘ten key household behaviours’ (table 3.1). While welcome guidance on ‘themes of transformation’ and ‘understanding and influencing behaviour’ is included in RPP2, this needs to inform proposals and policies across the document, including the chapter on Homes and Communities.

About Stop Climate Chaos Scotland

Stop Climate Chaos Scotland (SCCS) is a diverse coalition of over 60 organisations campaigning together on climate change, including environment, faith and development organisations, trade and student unions and community groups. For more information visit www.stopclimatechaos.org/scotland.

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