

STOP CLIMATE CHAOS SCOTLAND RESPONSE TO LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE CALL FOR VIEWS ON THE CLIMATE CHANGE PLAN UPDATE 2021

The Local Government and Communities Committee is particularly interested in the following questions as they relate to:

- planning
- housing
- buildings
- fuel poverty
- green recovery as it relates to this Committee's remit

This response is submitted on behalf of Stop Climate Chaos Scotland ("SCCS"), the diverse coalition of over 50 civil society organisations in Scotland who campaign together on climate change. Our members include environment, faith and belief groups, international development organisations, trade and student unions and community groups. This response complements those responses submitted by individual member organisations and by individuals who are associated with SCCS or its members.

This response is based on an analysis of the CCPu against the various [transformational changes that SCCS called for, as the Government was preparing the update](#). It should also be read in the context of our response to the ECCLR Committee which provides an overview of the CCPu and its ambition.

1. What is your assessment of the progress to date in cutting emissions within the sector/sectors of interest and the implementation of the proposals and policies set out in previous Climate Change Plans (RPP1-3)?

It is self-evident that progress to date has been insufficient. Greenhouse gas data, [released by the Scottish Government](#) in June 2020 showed that Scotland has missed its annual target for reducing emissions. **Climate change emissions actually increased between 2017 and 2018 by 1.5%**. In response to these data, [SCCS called for more actions](#) to deliver real and sustained reductions – this CCPu was the opportunity to deliver such actions, many of which [were proposed in advance by SCCS](#).

2. Do you think the scale of reductions proposed within the sector(s) are appropriate and are the proposals and policies within the CCPu effective for meeting the annual emissions targets and contributing towards the 75% reduction in GHG emissions by 2030 and net-zero by 2045 targets?

Buildings

The CCPu proposal to reduce building sector emissions by ~80% compared to today's levels appears consistent with Scotland's 2030 climate target. We welcome this ambition given its potential to make millions of homes in Scotland warmer and more efficient. There are also some welcome and fairly comprehensive updates to policies in the CCPu regarding how this reduction can be achieved. However, we are concerned that these policies overall are insufficient to meet climate targets as they lack clarity about the timing and supporting measures to deliver them. We hope this detail is provided in the upcoming "Heat in Buildings Strategy".

The proposal to introduce "regulations for all buildings to achieve a good level of energy efficiency" by 2035 is welcome, although there should be more certainty that "a good level" is equivalent to 'Energy Performance C'. In addition, the proposed date should be brought forward (e.g. to 2030) and policies in the plan (including regulation of privately and socially rented homes) bolstered – to increase the scale of Government fuel poverty schemes and measures to drive significant uptake by private homeowners. These steps will drive activity this decade, build supply chains, reduce fuel poverty, and create new green jobs in building and retrofitting homes to have appropriate insulation.

A gap also needs bridging between the welcome ambition to switch a million homes to renewable heating systems by 2030 and detail to achieve this. The CCPu indicates that Scotland needs to move from installing around 2,000 renewable systems in homes each year to reach up to 100,000 per year this decade, but is vague about how.

The proposed investment of £1.6 billion in heat and energy efficiency over the next Parliament is welcome – especially as this is subject to the caveats on fuel poverty and just transition. However, no specific figure given for spend on fuel poverty is provided, where a doubling of annual spending on fuel poverty schemes to around £240 million is needed – toward achieving a just and fairer Scotland.

3. Do you think the timescales over which the proposals and policies are expected to take effect are appropriate?

Addressed, where appropriate in various comments under Q2.

4. To what extent do you think 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?

Addressed, where appropriate in various comments under Q2.

5. To what extent do you think the CCPu delivers a green recovery?

SCCS fully supports the concept of a “green recovery” and many of our members have contributed to Scottish Government thinking on this issue, as well as delivering ‘on-the-ground’ activities. Our response to the ECCLR committee call for views on green recovery in August 2020 can be read [here](#).

It is self-evident that for a green recovery to be ‘green’, it must deliver reductions in emissions consistent with the net-zero by 2050, and 75% by 2030, targets. As indicated in our responses to questions 1-4 above (and in response to the other Committees), we are concerned that the plan, while seeking to achieve these welcome targets, does not contain sufficient detail or commitments to ensure that is the case.

In relation to ‘recovery’, SCCS has always recognised that addressing climate change will require changes to the economy – and we have promoted the concept of a ‘Just Transition’ to ensure that those changes are fair. We therefore warmly welcome that the CCPu states “*across all of the actions in this Climate Change Plan update, we are embedding a just transition, ensuring that we assess how green recovery actions address inequalities and deliver wellbeing outcomes for everyone*” (p42).

It is also very welcome that the Just Transition concept is therefore fully acknowledged in introduction and in the Green Recovery chapter/context, which includes a specific ‘box’ headed Just Transition and refers to the recommendations of the recent Just Transition Commission.

However, there is no commitment to a separate Just Transition plan or any commitment to revise/update the current Economic Strategy. There is no reference to continuing the (non-statutory) Just Transition Commission or placing it on a statutory basis. While there are references to the role of Enterprise agencies, growing the clean energy industry and the roles of public procurement, these are primarily all good intentions with unclear delivery pathways.

Accordingly, we therefore recommend that the ‘green recovery’ aspects of this plan are (a) made genuinely ‘green’ by the strengthening of the actions to reduce emissions and (b) that the commitments to a just transition are underpinned by, for instance: -

- A clear commitment to a specific Just Transition Action Plan.
- A commitment to continue the Just Transition Commission (and place it on a statutory footing), as well as seek its advice on further steps.
- A commitment to a full revision of the current economic strategy to recognise the need for a green recovery (including major green investment supporting job creation, and strong skills action), as well as a just transition and a transition to a well-being economy.

Finally, we also believe that the plan should integrate the role of communities in a much more systematic way with regards to the sectoral chapters, much as each chapter includes detail on the roles individuals, businesses and the public sector will have to play in achieving our targets. While community climate action is touched upon at some points in the CCPu, including in the Green Recovery chapter and the section on food and climate change, we believe the role of communities should be included much more consistently across each sector in the final Plan, including with regards to electricity, buildings, transport and waste.