



## Just Transition discussion papers:

### **A response from SCCS to the Scottish Government discussion papers on a Just Transition in the land use, transport and built environment sectors.**

September 2023

#### **Introduction**

Stop Climate Chaos Scotland (“SCCS”) is a diverse coalition of over 60 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. We believe that the Scottish Government should take bold action to tackle climate change, with Scotland delivering our fair share of action in response to the Paris Agreement and supporting climate justice around the world.

SCCS welcomes the opportunity to comment on these discussion papers. This is a strategic response, submitted in response to all three papers, and is thus offered in the form of a written submission rather than by completion of the questionnaires.

SCCS is aware that a number of our members and partner networks such as Scottish Environment LINK and the Just Transition Partnership have submitted, or will submit, detailed responses to one or more of the papers. SCCS commends and supports these. We also note and commend much of the stakeholders’ feedback, submitted through the Scottish Government’s Climate Policy Engagement Network. In addition, SCCS is aware of a range of work that describes, and proposes action to ensure, a Feminist Just Transition, both in Scotland<sup>1</sup> and internationally<sup>2</sup>; we commend these for consideration as part of the Scottish Government process.

We hope that, when drafting and concluding the final Just Transition Plans, these various responses and reports will all be considered and be reflected in the final plans.

#### **Climate context**

From devastating droughts to catastrophic floods, the impact of the spiralling climate crisis could not be clearer, and those with the least responsibility for causing rising global temperatures are facing the most severe - and deadly - consequences.

The UN Secretary General, António Guterres, recently said: *‘humanity is on thin ice — and that ice is melting fast.’* He called on the world’s nations to *‘massively fast-track climate efforts by every country and every sector and on every time frame.’* Similarly, Lord Deben, the outgoing chair of the Committee on Climate Change, has said: *“our children will not forgive us if we leave them a world of withering heat and devastating storms where sea level rises and extreme temperatures force millions to move because their countries are no longer habitable. None of us can avoid our responsibility. Delay is not an option.”*

A climate emergency was declared by governments in 2019 in response to years of campaigning and the massive upwelling of concern expressed through the school strikes. Although this declaration raised unprecedented concern throughout society and business, it resulted in very little tangible new or accelerated action or policy. For this emergency to be taken seriously, we require a step up in action across every sector and at an accelerated scale and speed.

Scotland has been a global climate leader. When our Climate Change Act first set targets for emissions’ reductions, they were “world-leading”. The Scottish Government has also championed international action and committed funds to climate justice and to Loss & Damage. These steps are welcome. However, our current net-zero targets are now no longer unusual (other countries have

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<sup>1</sup> <https://www.swbg.org.uk/content/publications/FJT-Discussion-Paper.pdf>

<sup>2</sup> <https://mia.giz.de/qlinkdb/cat/ID=251505000>



matched them) – and, of course, we have, in practice, missed our targets in eight of the past twelve years. So, we are missing our annual targets and the Scottish Government's own monitoring shows we are off track for our 2030 and 2045 targets.

### **Just Transition context**

The seriousness and urgency of the climate crisis, as briefly described above, means that significant and urgent action is needed by governments. The Scottish Government's role in delivering these actions is set out in the current CCP/CCPu, which will shortly be updated by a new CCP (expected November 2023). This new CCP will need to include bold and ambitious actions to ensure that Scotland meets its emissions' reduction targets.

However, in developing and implementing these actions, the Scottish Government must also recognise that people and communities that suffer most from the impacts of climate change are not those responsible for its cause. This underlines the need for international climate justice. However, it is also the case within countries, such as Scotland, that people living in areas of high disadvantage, children, older people, disabled people, and people with health conditions are often disproportionately affected by environmental problems and are often least responsible for causing environmental damage<sup>3</sup>. This environmental injustice needs to be addressed – but, it is also important that it is not exacerbated by the necessary changes as we transition to a net zero economy. In addition, those people and communities who have benefited from, for instance, fossil fuel exploitation should, as appropriate and fairly, be assisted through the transition.

### **SCCS support for Just Transition principles**

For the reasons described above, SCCS has long supported and promoted the principles and ideas of a Just Transition. This means that the actions to address the climate crisis must be designed and implemented in a manner that is fair – and that leaves no community or group disadvantaged and ideally results in a sustainable, wellbeing economy benefiting us all.

This long commitment to the principles of a Just Transition and record of calling for deliver this is illustrated, for instance, in our response to the (first) Just Transition Commission's call for evidence, in June 2020, supported the principles and ideas of a just transition and indicated that:

*"The Scottish Government should carry out strategic reviews of policy areas with high impacts on emissions, and ensure that policies are designed to facilitate a Just Transition"<sup>4</sup>.*

It is also evident in our evidence to Parliament, in 2021, on the (then) draft CCPu called for:

- "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."<sup>5</sup>

Our 'manifesto' for the Holyrood elections of 2021, we called for "the next Scottish Government to:

1. Deliver transformative change to cut emissions across all areas of life
2. Phase out our most polluting activities as part of a Just Transition to a low carbon future
3. Be a good global citizen and demonstrate world leadership by championing climate justice"<sup>6</sup>.

In a 2022 briefing outlining the conclusions of an SCCS-commissioned report on the use of fiscal measures to tackle the climate crisis<sup>7</sup>, we commented on the links between the climate crisis and the

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<sup>3</sup> <https://www.ercs.scot/wp/wp-content/uploads/2021/12/Advocacy-Manifesto-Dec-2021.pdf> and European Environment Agency (2019) Healthy environment, healthy lives: how the environment influences health and well-being in Europe: <https://www.eea.europa.eu/publications/healthy-environment-healthy-lives>.

<sup>4</sup>

<https://www.stopclimatechaos.scot/wp-content/uploads/2020/07/SCCS-response-to-Just-Transition-Commission-June-2020-final-version.pdf>

<sup>5</sup> <https://www.stopclimatechaos.scot/wp-content/uploads/2021/01/SCCS-FINAL-response-ECCLR.pdf>

<sup>6</sup> <https://www.stopclimatechaos.scot/wp-content/uploads/2020/10/SCCS-Manifesto-FINAL-.pdf>

<sup>7</sup> [https://www.stopclimatechaos.scot/wp-content/uploads/2022/09/FinancingClimateJustice\\_Briefing\\_ONLINE.pdf](https://www.stopclimatechaos.scot/wp-content/uploads/2022/09/FinancingClimateJustice_Briefing_ONLINE.pdf)



cost of living crisis (see box). Although written in October 2022, these issues are still relevant and the conclusions underline the need for a Just Transition.

**The Cost of Living Crisis**  
(from an SCCS briefing in 2022)

We are currently experiencing a cost of living crisis that is impacting those on the lowest incomes worst of all. Brexit impacts, COVID recovery, the war in Ukraine driving rapidly rising inflation, escalating interest rates and spiralling energy bills are all contributing to challenging economic circumstances. Responding to this will dominate political debate and will be the highest priority for both the UK and Scottish Governments in the months ahead.

It might be argued, therefore, that this is the wrong time to consider the need to spend more money on reducing emissions or supporting those being impacted by the climate crisis. However, the measures to address the climate crisis and address the cost of living crisis can, in fact, be aligned and complement one another. Thus, it is exactly the right time to have this debate, as we cannot afford to slacken our efforts to avert even deeper climate chaos.

Indeed, the Climate Change Committee's 2022 UK progress report made just this point, in their top recommendation which stated that: "action to address the rising cost of living should be aligned with Net Zero"<sup>8</sup>. The measures they called for was a "sustained push for both energy efficiency improvements and electrification" and rapid deployment of onshore wind and solar energy schemes.

A cost of living crisis may be exactly the time to redirect subsidies and tax breaks, impose windfall taxes on energy companies, and increase revenue from (the top-end) of Income and Corporation Taxes, while looking to better tax wealth, thereby to invest in the solutions which will help people out of the current crisis and avoid similar crises in the future.

We strongly endorse First Minister Nicola Sturgeon's recognition that the climate and nature crisis is becoming more urgent, and that Scotland's "response to the cost [of living] crisis must also deliver for the climate"<sup>9</sup>.

SCCS strongly supports the recommendation [in the report on the use of fiscal measures to tackle the climate crisis that measures to address the cost of living crisis] must also reduce emissions so that they help head off future crises, and that well-designed climate measures can help achieve social and wellbeing goals.

These commitment to a just transition were reflected in SCCS' October 2022 briefing on a managed wind down of North Sea oil & gas production in line with a Just Transition, which stated:

*"SCCS therefore calls on the Scottish Government to immediately start planning for a credible managed wind down as part of a Just Transition, with trade unions and communities fully involved in agreeing timescales. SCCS believes the Scottish Government must take a 'hands-on' approach to ensure a just transition, utilising all powers at their disposal to prioritise the creation of decent jobs in renewables and energy efficiency and put in place strong safeguards for impacted workers transferring from oil and gas jobs to renewables and other work"*<sup>10</sup>.

In response to the Scottish Government's draft Energy Strategy and Just Transition Plan, in May 2023, SCCS said:

*"SCCS considers that the plan is positive, as far as it goes; however, it seems very aspirational with very few specific policies or actions proposed, and little on timeframes or how results will be measured/reported. A more coherent approach is needed."*

<sup>8</sup> <https://www.theccc.org.uk/publication/2022-progress-report-to-parliament/>

<sup>9</sup> <https://www.gov.scot/publications/stronger-more-resilient-scotland-programme-government-2022-23/>

<sup>10</sup>

<https://www.stopclimatechaos.scot/wp-content/uploads/2023/01/SCCS-briefing-a-managed-wind-down-of-North-Sea-oil-and-gas-production-in-line-with-a-Just-Transition.pdf>



*“Thus, in finalising a coherent Just Transition Plan, it is important that it properly considers existing inequalities, including gender inequalities, and sets out a clear road map of how these will be addressed. The strategy must, therefore, do more to ensure a just transition for others, particularly by ensuring the just transition (in the energy sector, and more widely) genuinely delivers for those left behind to date: those on low incomes, women, those with disabilities, and ethnic minority communities. For instance, Just Transitions are opportunities to improve gender equality<sup>39</sup>. Women and girls across Scotland can be primary beneficiaries by centring care in just transition strategies.*

*“Finally, SCCS supports the need for a just transition, including within the energy sector, the transition can only be truly just - particularly for those communities impacted by our climate damage, if it is also much faster. As highlighted above, there is a need to urgently reduce emissions by 2030 in order to limit the temperature rises to 1.5°C, and while the damage already being caused is huge, it will steadily get even worse for every fraction of a degree of warming. This urgency underlines the need for a clear and well-planned just transition, with properly resourced actions to deliver the outcomes desired”.*

...

*“[it] supports the need for a just transition, including within the energy sector, the transition can only be truly just, particularly for those communities impacted by our climate damage, if it is also much faster.*

*“... The draft strategy also has a significant emphasis on ensuring a just transition for oil and gas workers, and thus on the NE of Scotland. This is necessary - but the strategy needs to be broader, recognising the (linked) needs for just transition in, for instance, the transport sectors, and across the whole of Scotland, particularly for low-income households. Vital to this is consideration of existing inequalities, including gender and other intersectional inequalities”<sup>11</sup>.*

### **The SCCS Climate Manifesto**

As described above, the Scottish Government has rightly called this time - the 2020s - the ‘decade of delivery’ on climate change. Yet, to date, delivery is lacking – so we must find ways to confront the scale, complexity and ubiquitous nature of the challenge. The SCCS Climate Manifesto<sup>12</sup> is an attempt to rise to that challenge and set out the full range of policy measures that are necessary.

The manifesto of policy ideas has been drawn together from across the Stop Climate Chaos Scotland coalition’s 60+ diverse members, with additional input from other Scottish groups and networks. It is probably the most comprehensive set of climate change policies ever assembled by civil society. Adopting the policies proposed would help to put Scotland on track to deliver the real reductions in emissions that the planet needs and to make a fairer contribution to helping other countries deal with climate change in their own ways. As well as protecting us from some of the challenges a changing climate brings, adopting these policies would also help create jobs, boost the economy, and make our society fairer and healthier.

The need to address the climate crisis through a just transition is recognised throughout this Climate Manifesto, with the introduction stating:

*“[The Scottish Government] must confront [the climate] challenge in ways that realise its commitments to climate justice - justice for those impacted by the damage our emissions are creating, and justice in the way we reduce our emissions, including protecting those on low incomes and making polluters pay for their pollution”.*

*“In driving a Just Transition away from fossil fuels, Scotland must make sure that policies and programmes simultaneously address poverty and inequality, in Scotland and overseas. After*

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<sup>11</sup> <https://www.stopclimatechaos.scot/wp-content/uploads/2023/05/SCCS-ESJTP-response-May-2023.pdf>

<sup>12</sup> <https://www.stopclimatechaos.scot/manifesto>



*all, the climate crisis is caused by inequality; it's causing more inequality; and the response to it could – if not purposefully designed to be just and equitable – entrench inequality”.*

The Climate Manifesto also stresses the need to “proactively tackle climate, poverty and inequalities together” calling for:

*“Action to reduce Scotland's emissions should be pursued in ways that actively reduce poverty and narrow existing inequalities, including gender, disability and racial injustice, with the impact of all relevant strategies and plans transparently assessed.*

*“Where climate action can exacerbate existing inequalities - for example through increased costs incurred to low-income households for decarbonising heat in buildings - these policies must be part of a package of fiscal measures that support low-income households to maintain or increase their overall household income. Regressive impacts must be identified and proactively mitigated against.*

*“This [ ] involves a broadening of the definition of 'Just Transition' to ensure that the shift to a sustainable economy and society is achieved in ways that support the wider goals of ending poverty and narrowing inequalities”.*

To implement these ideas, the manifesto includes specific policy proposals that can support a just transition, including:

- Issues related to inclusion, participation and education.
- Finance and economy policies, especially the principle of “Make Polluters Pay”.
- Proposals for a Just Transition in energy.
- Fair transport pricing, including making bus travel free for all.

SCCS believes that the (devolved) policy proposals set out in our Climate Manifesto would, if included in the Climate Change Plan and/or the relevant Just Transition Plan would significantly advance progress towards our emissions' reductions targets and help secure that objective through a just transition.

### **The Scottish Government Just Transition discussion papers**

In the context described above, SCCS welcomes the publication, by the Scottish Government, of these discussion papers that focus on agriculture/land use, transport and buildings<sup>13</sup> as an initial step towards the production of sectoral Just Transition Plans. We further welcome the establishment of the Just Transition Commission, and the expertise and advice it provides.

The discussion papers include valuable information and admirable outline aspirations. However, it must be recognised that, as yet, they fall well short of being ‘plans’.

The papers fail to make clear the scale of change needed in each sector to reach net zero and the challenge this presents. While it is acknowledged that a full analysis of the measures required to reach net zero (and the policies that will be introduced to this end) are matters for the Climate Change Plan, a Just Transition Plan will need to recognise the impact of those measures – and put in place additional measures to ensure the transition is fair and just. In the absence of the (CCP) policy proposals and/or any measures to support these to be fair, the papers describe the important issues but do so without saying how they will be addressed. To some extent, this is understandable in a ‘scene-setting’ document, but they fail to make clear that the Plans, themselves, will need to do this.

Thus, while acknowledging that these papers are not (yet?) the plans to be published, the papers do not even describe the required content of an effective plan. It must be recognised that a ‘plan’ will need to include:

1. A Vision;
2. A list of actions necessary to achieve the vision; and

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<sup>13</sup> <https://www.gov.scot/publications/transition-built-environment-construction-sector-discussion-paper/pages/1/>, <https://www.gov.scot/publications/transition-transport-sector-discussion-paper/pages/1/> and <https://www.gov.scot/publications/transition-land-use-agriculture-discussion-paper/pages/1/>



3. How the Scottish Government will implement those actions (if appropriate) or ensure those actions take place (if for others).

The vision will need more than simply 'to reach net zero by 2045' (and interim emissions' reduction targets) but will need to describe the nature of the economy, society and land/seascapes in which we will live. By setting out a vision of ecologically, economically and socially viable communities, the appropriate changes can be identified and caused to come about. A greater level of understanding about the scale of necessary change is required – and the Climate Change Plan and Just Transition Plans must portray this clearly. The plans will also need to set out the measures to be used to assess progress towards this vision.

These discussion papers, therefore, seem to be a missed opportunity to more seriously examine the detail of the changes required to get to net zero in each sector. Only through an examination of the proposed pathway to net zero can the implications be identified and addressed.

SCCS hope the above comments on these discussion papers will be of value in the preparation of the full Just Transition Plans, to be published alongside the draft Climate Change Plan. Below we also offer some brief comments on each of the separate sectoral discussion papers. In many areas, our comments are addressed to the policies required to reduce emissions, as well as the means to ensure that these are implemented in keeping with a Just Transition. As such, there is overlap between our policy proposals submitted to the Climate Change Plan team (via eNGO roundtables) and those set out in the Climate Manifesto, and those set out here.

### **Specific comments on the land use and agriculture paper**

This discussion paper fails to convey the magnitude of change that the sector needs to undergo and the urgency required. The discussion document refers to how the land use sector emits 0.4 MtCO<sub>2</sub>e (2021 figures) and, while this net figure is correct, it gives the impression that emissions are less of an issue than they are. It is important to convey that, first, the sector is a large emitter of carbon and, second, that its sequestration potential is going to be used by other sectors as well as land use and agriculture. The annex to Scottish Environment LINK's response<sup>14</sup> provides a full explanation of this issue, which must be better addressed.

This paper should also convey more clearly that the nature crisis is intertwined with the climate crisis and its consideration is central to the net zero pathway for this sector. In reducing our emissions, it is critical to both avoid measures that might harm nature and include nature restoration measures that contribute to mitigation and sequestration.

The significant role of peatland (as an emitter and sequester of carbon) needs to be highlighted as does the scale of peatland restoration required and associated need for investment or other mechanisms to make it happen, skills and training etc.

Sporting interests and deer numbers both weigh heavily on achieving Net Zero and wider social and environmental outcomes of the transition which needs recognition.

Integration of land uses and redefining 'farming', for example with more agro-forestry and woodlands on farms, will be a feature of the transition and should be spelled out.

### **Specific comments on the transport paper**

This paper needs to recognise, more clearly, the changes that will be needed in this sector. In particular, the vision must describe that, in future:

- Car use will be reduced;
- Air travel will be reduced;
- Our bus networks will be transformed;
- Rail travel is electrified and well-staffed;

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<sup>14</sup> <https://www.scotlink.org/wp-content/uploads/2023/09/JT-land-use-and-ag-response-to-discussion-paper-Sept-23.pdf>



- Lifeline ferries and maritime travel chaos is fixed; and
- Cycling, walking and other active travel is safe, accessible and affordable.

The Just Transition Plans (and/or Climate Change Plan) must set out the actions necessary to achieve this future. Such measures, if implemented well, would deliver both emissions' reductions and ensure this supports a just transition. For instance:

- The reduction in car use has the potential to reduce the creation of inequalities and health inequalities and can have a positive impact on people facing socio-economic disadvantages<sup>15</sup>.
- The benefits of car travel are denied to some social groups. These benefits are mainly enjoyed by more affluent people who can afford a car, excluding groups such as young people, older people, disabled people, women, ethnic minorities etc.
- Lower socioeconomic groups are the ones that are the most affected by the negative impacts of car driving (noise pollution, less access to green spaces etc).

Immediate interventions and policies that might be included in the to outline in the Just Transition Plan (and/or Climate Change Plan) include:

- Create a way to plan and build Scotland's public transport network alongside and between local authorities.
- Assess the investment needed to electrify trains further, including the potential job creation and a timeline for delivery.
- Begin planning for an integrated transport network to set out milestones and target dates on the way to providing coherence and coordination across all public and active travel options.
- Increase funding to local authorities to ensure new powers and any coordination efforts can be delivered by local government through municipal ownership.
- Integrating access and disability, as well as income assessments, into all transport decisions to ensure transport funding is better balanced between cars, public transport, and active travel.
- Support trials of free public transport as recommended by the Just Transition Commission urgently and in the meantime extend free public transport to those on low incomes, including asylum seekers and people receiving benefits.
- Support the unique challenges facing people in the Highlands and Islands with a bespoke section of the plan that considers the necessary investment and transport system necessary to support these communities.
- Implement plans for 20-minute neighbourhoods and share details within communities about changes to come and multiple co-benefits while ensuring local communities are about to shape the design and vision for their surroundings.
- Bring workers across the transport sector into transition planning to ensure their skills and experience guide the delivery of plans while building the capacity of workers to advocate and demonstrate the positives of a transformation in how we travel.

### **Specific comments on the buildings and construction paper**

Emissions from the buildings sector cover emissions from fuel combustion for heating and cooling and garden machinery, and, perhaps unexpectedly, fluorinated gases released from aerosols and metered dose inhalers. Emissions fell 21% between 1990 and 2021.

Improving the energy efficiency of buildings reduces carbon emissions, cuts household bills and makes homes healthier. The top priority in reducing emissions from buildings is to improve the efficiency of each building, the next priority is to change heating systems over to zero-carbon technologies. The Bute House Agreement between the Scottish Greens and the SNP committed to the majority of homes achieving an energy efficiency of EPC C or better by 2030, and all homes reaching this level by 2033.

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<https://www.publichealthscotland.scot/media/11127/scottish-government-target-for-20-reduction-in-car-kilometres-by-2030-implications-for-health-and-health-inequalities.pdf>



Energy Action Scotland state that a quarter of households in Scotland are in fuel poverty<sup>16</sup>. A recent AgeUK survey of older people in Scotland found that 76% were always concerned about paying their electricity bill, only 46% felt they could heat their home to a comfortable level and four in ten identified themselves as living in fuel poverty<sup>17</sup>.

There is, therefore, a pressing urgency to develop a range of policies to address emissions from buildings, and to ensure that these are applied in a socially equitable manner to support a just transition. The Scottish Government's Heat in Buildings Strategy does set out the appropriate aspirations – but these need to be supported by relevant regulations, financial support and advice to ensure the aspirations are delivered.

The recent recommendations from the Existing Homes Alliance suggest a range of measures that might be developed and implemented as part of such a package of measures<sup>18</sup>. These include:

- Prioritise fuel poor households in heat decarbonisation policies, investment and delivery programmes.
- Develop and implement strategies to cover the following (as per recommendations in recent report from RAP<sup>19</sup>):
  - reduce upfront costs;
  - reduce running costs;
  - develop innovative ways to safeguard affordability (eg multiple technologies; connect to local/surplus renewable generation; 'heat as a service' payment plans; flexible tariffs).
- Take a fabric first approach to standards – including all fuel poor and social housing to reach EPC band B or equivalent by 2030 (with adequate capital funding to meet this aim).
- Provide support for compliance with energy efficiency and heat regulations when they come into force.
- Delivery programmes should include:
  - Hand-holding support to get maximum benefit from measures;
  - Whole-house approach – fabric first, then clean heat with the option of further support where additional measures are required to guarantee lower running costs;
  - Mitigation measures to alleviate cost increases for those in or at risk of fuel poverty, such as supporting additional measures (such as solar, battery storage, additional insulation);
  - In the small number of cases where decarbonising will increase running costs even with mitigating measures, interim solutions should be provided, such as gas boilers running at low flow temperature (possibly using stock of gas boilers recycled from homes switching to heat pumps). This should be reviewed in light of energy market reforms/changes.
- Support community-based programmes (linked to Home Energy Scotland) to identify and engage with fuel poor households.
- Deliver on the EHA Rural Transition Package asks to ensure extra costs associated with retrofitting properties in rural areas are addressed. This should include:
  - Support and facilitation of innovative investment mechanisms such as collective purchase, payment plans, community asset ownership and third-party ownership.
  - Expansion of locally based advice and support services, so everyone who needs it has access to dedicated hand-holding and support services.
  - Scaling up and rolling out the EnergyCarer approach, building on lessons learned from the HES Homecare pilot.
  - Financial support to cover remedial/enabling works to make homes wind and watertight where this is a barrier to improving energy efficiency.

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<sup>16</sup> <https://eas.org.uk/key-issues/fuel-poverty-overview/>

<sup>17</sup> <https://www.ageuk.org.uk/scotland/our-impact/policy-research-influencing/reports-research/taking-the-temperature/>

<sup>18</sup>

<https://existinghomesalliancescotland.co.uk/wp-content/uploads/2023/05/EHA-response-to-the-Draft-Energy-Strategy-Just-Transition-Plan-consultation.pdf>

<sup>19</sup> <https://www.raponline.org/knowledge-center/taking-burn-out-of-heating-low-income-households/>





- o Dedicated hand-holding service to support rural businesses to access financial and other support.
- Review Local Heat and Energy Efficiency Strategies (LHEES) to ensure they are highlighting priority areas for district heating to help reduce fuel poverty rates, and that these are part of subsequent delivery plans.
- Ensure registered social landlords are key partners in the development and delivery of LHEES.

### **Conclusion**

SCCS welcomes the opportunity to comment on these discussion papers – as well as the opportunity to discuss issues with officials. We hope that, when drafting and concluding the final Just Transition Plans, this response will all be considered and the issues raised will be reflected in the final plans.

Stop Climate Chaos Scotland  
September 2023