



Evidence on Draft Climate Change Plan

Local Government and Communities Committee

Introduction

Stop Climate Chaos Scotland (SCCS) is a civil society coalition campaigning for action on climate change. Members include environment and international development organisations, student unions and trade unions, community groups and faith groups. We believe that the Scottish Government should take bold action to tackle climate change here at home and play its part in supporting climate justice around the world. We are grateful for the opportunity to share the views of the coalition on the aspects of the Draft Climate Change Plan which relate to the remit of this Committee.

Overview

- The Draft Climate Change Plan sets out a positive vision of a low carbon future which is cleaner, healthier and more prosperous. However, SCCS remains concerned that the Draft Plan contains little detail on how that vision will be achieved and therefore lacks credibility in its current form.
- The Draft Plan contains very few new policies, despite the UK Committee on Climate Change clearly setting out the areas where new policies or policy developments were needed as recently as September.
- While progress can be made on areas such as waste and peatland restoration under this Draft Plan, the worst performing sectors will continue to perform poorly. Experts have repeatedly said that the transport, agriculture and heating sectors needed more action from Scottish Government. However, these are the weakest sections of the climate plan, offering little in emissions reductions and providing little in terms of credible, measurable policy.
- In areas such as energy efficiency, which the Scottish Government has designated a National Infrastructure Priority, bold new policy action is lacking. The Draft Plan moves too slowly with too little funding and does too little to tackle fuel poverty.
- The Draft Plan is not measurable. Despite the welcome adoption of a whole energy system approach, the Plan does not clearly establish how policies will result in emissions reductions in each sector. In addition, some sectors contain almost no measurable outputs or timed milestones by which progress towards outcomes can be measured.

MATCH Criteria comparison

The MATCH criteria by which to judge the Draft Plan was developed by WWF Scotland and adopted by SCCS. The criteria ask if the Draft Plan is Measurable, Ambitious, Transparent, Credible and Holistic.

- **Measurable** – The Draft Plan is not measurable. It is not possible to gain an understanding of the relative contributions of policies to emissions reductions. In some areas, policies lack measurable milestones
- **Ambitious** – In some areas such as heat, the Draft Plan is very ambitious. However, there is a lack of credible policies with which to realise that ambition. In other areas such as energy efficiency, transport and agriculture, the level of ambition is disappointing.
- **Transparent** – The Draft Plan does not clearly explain how each policy or policy outcome contributes towards climate targets.
- **Credible** – The Draft Plan is not credible. Despite a welcome balance in favour of policies over proposals, the Draft Plan does not clearly show how all emissions targets will be met. In addition, the Draft Plan is overly reliant on voluntary measures, awareness raising and the actions of the UK Government and EU to achieve its aims.
- **Holistic** – The Draft Plan contains some useful assessments of the wider impacts of policies and proposals in each sector. Some further assessment of financial and social impacts would strengthen the Draft Plan in this respect.

Recommendations for improving the Draft Plan

Our recommendations are split into those which pertain to the whole Draft Plan and those which are sector specific policy recommendations.

Draft Plan recommendations

- The Scottish Government should ensure that every policy has sufficient detail to allow readers to assess the impact of that policy on meeting Scotland's climate targets or providing additional co-benefits.
- The Draft Plan should be amended to include more new policies, particularly in sectors which have historically underperformed such as transport and agriculture. This should include changing some proposals into policies.
- The Draft Plan should be amended to ensure that every policy outcome is measurable with clear expectations on outputs, milestones and outcomes.

Sector specific recommendations

- **Energy efficiency:** The Scottish Government should support all homes to reach at least an EPC band 'C' by 2025. The roll out of the new Scottish Energy Efficiency Plan must set clear objectives, start earlier and be properly funded to deliver the transformational change which Scotland's homes and buildings require.
- **Heating:** Whilst the ambitions on heat in the Draft Plan are set very high, the policy action to deliver them is lacking. Every new home should have a connection to low carbon heating such as solar, heat pumps or district heating
- **Transport:** The Scottish Government should produce a credible plan as part of the Climate Change Plan to ensure that there are no new sales of petrol and diesel cars by 2030. This should be supported by new policies such as Workplace Parking Levies and Low Emission Zones, operated at local authority level, as well as support for people to switch to public transport, active travel or electric vehicles.

Residential (Energy Efficiency)

Policies and proposals on energy efficiency in both the Residential and Services sectors are disappointingly weak. SCCS and others have consistently called for all homes to be brought up to an EPC C rating by 2025 to make a substantial impact on cutting fuel poverty and reducing emissions. Under our proposals, this would be achieved through a significant increase in spending on and uptake of energy efficiency measures in the immediate term. However, this Plan contains no significant increase in spending or any clear details on how regulation will be used to leverage private finance, and no credible detail on how the proposed doubling in uptake in measures will be achieved.

Progress since RPP2

Around 100,000 households have received an energy efficiency install through HEEPS since RPP2. However, both RPP1 and RPP2 committed to introducing regulation of energy efficiency in the private sector to make Scotland's homes warmer and significantly reduce fuel poverty. Despite a consultation promised by June 2015 on regulation in both private rented and owner occupied homes, the Scottish Government is now expected to consult on regulating just the private rented sector later in 2017. We are concerned that this delayed and limited consultation will result in further delays in achieving the necessary emissions reductions and realising the positive social, health and economic benefits resulting from improved energy efficiency.

Appropriateness and effectiveness of the proposals and policies for meeting the annual emissions targets and contributing towards the 2020 and 2050 targets

The Draft Plan does not provide detail of the emissions reductions expected from energy efficiency improvements. This makes it difficult to assess whether the policies and proposals are appropriate in meeting the annual emissions targets and contributing to wider targets.

The Draft Plan does not contain any new energy efficiency policies, nor does it provide new policy detail on how the 2015 commitment to make energy efficiency a National Infrastructure Priority will be realised.

Appropriateness of the timescales over which the proposals and policies are to take effect

A significant part of the policies and proposals in this section are dependent on the Scottish Energy Efficiency Programme (“SEEP”), which is being consulted on at the same time as the Draft Plan. This is despite the Scottish Government originally proposing an expanded infrastructure approach as far back as June 2015. Whilst consultations are currently taking place, it is concerning that so much of the success of the Plan in relation to energy efficiency relies on a programme which does not yet exist and for which no clear scenario has been established for delivery. It is also concerning that the energy efficiency delivery timeline suggests that uptake of measures will double from 2017 to 2018 but lacks any detail as to how this will be achieved. Furthermore, no further increase in uptake is envisaged between 2018 and 2032.

Even more concerning is the pace of change which amounts to 1.35 million measures by 2032 or 90,000 per year. In contrast, experts across the fuel poverty field advise that at least 127,000 measures are needed each year to tackle fuel poverty.

Our asks

1. Improve the vast majority of homes to EPC band C or above by 2025, thus saving an estimated 1million tonnes of CO₂ a year by 2025, while lifting homes out of fuel poverty, improving public health and creating jobs. This should be achieved by setting this as a clear objective for SEEP and by embedding appropriate policies in the Draft Plan.
2. Regulate energy efficiency in private homes at the earliest possible opportunity
3. Increase the 2017/18 budget for energy efficiency and commit to further increases over the RPP3 period.

Residential (Heat)

The Residential sections of the Draft Plan set out policies and proposals relating to energy efficiency and heat for both domestic and non-domestic buildings. Whilst the emissions reduction ambitions in relation to heat are large, going further than have been anticipated by others including the CCC, the routes to achieve that ambition lack credibility. Much of the planned expansion of heat relies on new policies which are yet to be established, instead of rolling out existing technology and supporting Scottish low carbon heat businesses. If further detail cannot be included in this Plan, the ambition should be tempered and policy effort increased elsewhere.

Progress since RPP2

Around 100,000 households have received an energy efficiency install through HEEPS since RPP2, contributing to a reduction in domestic CO₂ emissions. However, the last RPP proposed that this Plan would include new policies to support the increased deployment of renewable heat. Whilst this Draft Plan contains a high level of ambition on heat, it contains little detailed policy with which to realise that ambition.

Appropriateness and effectiveness of the proposals and policies for meeting the annual emissions targets and contributing towards the 2020 and 2050 targets

The recent Energy of Scotland report by WWF Scotlandⁱ anticipated a reduction of 40% renewable heat by 2030, achieved through new district heating regulation to enable more homes to access low-carbon heat. In comparison, the Plan anticipates seeing low carbon heat in 80% of homes and 94% of non-domestic buildings by 2032. However, the planned pathway for achieving those ambitions appears to contain far less in terms of policy action than the Energy in Scotland report advocates. This raises questions around the credibility of the Plan.

Appropriateness of the timescales over which the proposals and policies are to take effect

The Plan suggests that there will be almost no progress in achieving mass roll out of low-carbon heat over the next decade, but anticipates a dramatic increase in deployment from the mid 2020s. However the Plan contains no new policies to support such an increase. Furthermore, there are no new policies or proposals to support even the modest shift to from 14% (if the 12% of electrically heated homes are included) to 18% by 2020. The rapid increase by 62% in 7 years relies on a yet to be determined technical fix to support the shift away from gas. This in turn relies on the UK Government to make decisions on the long term future of the gas network – decisions that are not expected until after 2020 at the earliest. This approach not only delays the mass roll out of low carbon heat technologies but it ignores existing technologies which could be used now, with a focus on off gas grid homes.

Behaviour change and wider benefits

The Plan does not detail the findings of behaviour change research in the sections on the Residential and Services sectors. However, Chapter 5 and Annex B on behaviour change both reference research using the Individual Social Material or ISM model of behaviour change, including research in the areas of domestic heat and energy efficiency. These show strong public support for energy efficiency measures and suggest some clear steps for the Scottish Government to take in relation to domestic heat.

Our asks

1. Establish a clear, credible path with detailed policies and milestones for achieving the ambitions on heat. This should include an earlier start in the shift to low carbon heat, building on existing success in heat pumps and district heating and growing these businesses.
2. Include new policies that will support the scale of transformation in heating envisaged, such as the use of building regulations and changes to planning, minimum standards, finance and the regulation of district heating.

Building Standards

Throughout the Draft Plan, reference is made to consulting on changes to Building Standards in order to improve energy efficiency or expedite the roll out of low carbon heat. However, experience from both RPP1 and RPP2 suggests that such consultations do not tend to yield results. Therefore if changes to Building Standards are needed, they should be included as policies in the Draft Plan.

For more information, please contact:

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ⁱ By Ricardo Energy and Environment. This led to the Energy of Scotland report
http://assets.wwf.org.uk/downloads/ricardo_energy_report_web.pdf