

## **Written submission from COSLA**

### **COSLA Position on the Draft Scottish Climate Change Plan**

1. We welcome the opportunity to contribute to the Scottish Parliament's scrutiny of the Scottish Government's Draft Climate Change Plan (CCP). Our response focuses on the broad political aims and ambitions of the plan, rather than providing a detailed analysis. Elected members are taking a keen interest, and we look forward to contributing to the debate more fully as it develops, throughout the Parliamentary scrutiny and beyond.

2. We welcome, and fully support the high level of ambition shown in the plan. The challenge is huge and unprecedented, and the resources required considerable. The detail of how targets will be met is not always clear, however, this is perhaps understandable given that the plan stretches across some 15 years and will necessitate major technological and societal change.

3. We believe that challenging political decisions have to be taken in the very near future and we need to ensure that we are not placing too much reliance on new technologies solving the problems in front of us. Without significant behaviour change and wider changes in our society, we run the risk that lower emissions derived from technological change are just offset by the convenience of using the improved technology. We argue that technological and behaviour change have to be addressed together, if we are to develop a broad and integrated approach to emission reduction.

### **Scottish Local Government's Commitment**

4. Scottish local government is fully committed to combatting climate change. Scottish local authorities have demonstrated clear leadership and a passion for making a difference by voluntarily creating the Scottish Climate Change Declaration.

5. This sets out local authorities' intent to work across all areas, in order to drive the behaviour and technological changes necessary to reduce carbon emission levels to those required to meet national targets. Since then, emissions directly attributable to council actions and estates have fallen substantially, demonstrating both the commitment of Scottish local authorities and the power of public statements of intent. The CCP and its implementation will take this existing commitment by local government further.

### **COSLA Position**

6. Elected members had a full consideration of the issues on the 17 February 2017, and Council Leaders will do likewise on the 24 February 2017. From this, we wish to highlight the following.

7. We welcome that Scotland shows political ambition and sets challenging targets to deal with climate change and we welcome the Draft Climate Change Plan.

8. The plan will require a step-change in Scotland's response to climate change. The political ambition now needs to be translated into concrete policy action, with adequate resources and budgets attached. In certain areas the plan places

considerable reliance on technological solutions which either do not yet exist or are at an early stage of development and adoption. While we recognise that technology will be a key driver of lower emission, it is also sensible to debate how consumer behaviour and societal change can reduce emissions in the nearer term.

9. Not all sectors within the plan seems to be showing an equal level of ambition. This is most noticeable in transport, which is the sector with the largest emissions. Emission from transport in 2014 were only marginally below emissions in 1990. The largest contributor to transport emissions is the road sector. In combination, cars, lorries, vans, buses and motor cycles accounted for 73% of total transport emissions and the emission reduction target for transport of 31% is off-set by an assumed growth. Should the plan be achieved as intended, over 90% of emissions in the year 2032 would come from transport, industry and agriculture.

10. While we recognise the difficulty of reducing emissions from transport, it seems that more ambition should be considered. Local government is prepared to enter a debate over how we can reduce emissions further, including benefits that could be delivered by initiatives that have been developed or piloted in other parts of the UK e.g. work place parking levies, low emission zones, speed limit changes and congestion charging. We can see an opportunity to engage in a Scotland wide debate on how such measures could operate and deliver wider benefits such as cleaner air, health benefits and higher activity levels.

11. In comparison, the planned reduction in domestic emissions by 76% seems extremely ambitious. In the near term it is planned that progress will be made through energy efficiency measures but in decades to come we will need to see cost effective alternatives to the use of natural gas to heat homes.

12. Equally, the proposed reduction in the services sector by 96%, requiring that by 2015 all non-domestic buildings (public and commercial) are near zero-carbon, is hugely challenging and will need much more detailed consideration and costing.

13. However, we do not ask Government to soften the targets and dilute these ambitions, but to recognise the size of the challenge and the massive investment needed, with potential issues around availability of resources, timescales, market readiness and risks.

14. There is a risk if significant progress relies predominantly on a few sectors, especially when the technology required is at such an early stage of development. We believe that a more cautious approach, spreading the risk, setting more challenging targets for sectors such as transport, and a stronger focus on behaviour change, would be beneficial and offer a broader response to the challenges we face. Equally, strategic national plans such as for transport, economic development or planning must reflect the ambitions of the CCP.

15. As more concrete policies and implementation plans are developed, there needs to be a recognition that different localities require distinct solutions. For example, parking levies might work well in congested urban areas, but not in remote rural areas. Equally, funding mechanisms, as they are being developed, need to allow for local flexibility, along with a need for an overall simplification of the funding system.

16. Local government must be involved in detailed discussions on policy direction and development, on the overall direction of travel, as well as for specific sectors such as services, residential and transport. We understand that the development phase of the plan did not allow for much consultation and partnership, but we believe that every opportunity still can and needs to be taken to jointly move forward and fully utilise the resources that Scottish local government and Scottish society have to offer.

17. As the level of democratic government closest to every citizen and our local communities, the reach and influence of local authorities across all sectors of Scottish society is unparalleled. Local authorities' work touches everybody, either as individuals or as members of a community, spanning functions from transport, planning, social and estate/property services, housing, waste, community engagement, economic development/local business and skills development to education. Framing issues locally can be of real impact when communicating the changes required. Scottish local authorities are consequently in a position to be at the forefront of efforts to reduce carbon emissions and to provide leadership and vision around these efforts.

## **Conclusion**

18. COSLA welcomes the Scottish Government's Draft Climate Change Plan and fully supports the high level of ambition shown here. There is a need now to discuss concrete policy choices, including politically more challenging policy choices, such as congestion charging, road pricing or building standards.

19. The risks associated with progress need to be more evenly spread across sectors and approaches. Local government is keen to commence these discussions and up for playing a full part in early progress.

COSLA

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