



The Scottish Parliament
Pàrlamaid na h-Alba

Local Government and Communities Committee

Aileen Campbell, Cabinet
Secretary for Communities
and Local Government

T3.40
The Scottish Parliament
Edinburgh
EH99 1SP
Email:

via email

LocalGovernmentandCommunities@parliament.scot

04 March 2021

Dear Aileen

Local Government and Communities Committee response to the draft Updated Climate Change Plan

I am writing to you with the Committee's views on the Scottish Government's LINK [Securing a green recovery on a path to net zero: climate change plan 2018–2032 – update](#). As part of the collective programme of committee scrutiny, led by the Environment, Climate Change and Land Reform Committee, we initially agreed to focus on the Buildings chapter of the Update, centred around planning and building.

Accordingly, on [27 January](#), we took evidence from representatives of the Energy Saving Trust, the Rural and Islands Housing Association Forum (represented by the Chief Executive of Hjalmland Housing Association Ltd), the Existing Homes Alliance Scotland, the Royal Town Planning Institute Scotland, and Sam Foster, architect and former Professor at Heriot Watt University, who gave evidence in a personal capacity and on behalf of Rural Housing Scotland.

COSLA gave evidence on [17 February](#), in a panel on their own, headed by their lead spokesperson, Councillor Heddle. COSLA had requested that they give evidence not just on the Buildings chapter but on local government's wider role in helping achieve the targets in the plan. As no other committee had invited COSLA to give evidence in relation to other Chapters, we agreed to this request

The [Energy Saving Trust](#), the [Existing Homes Alliance Scotland](#), the [Royal Town Planning Institute Scotland](#) and [COSLA](#) provided written evidence in response to the Scottish Parliament's general call for views on the Update. COSLA also provided a [second written response](#) directly to the LGC Committee.

Our thanks to all who provided written and oral evidence. The annexe summarises the main points made in evidence with conclusions and recommendations **in bold**.

Both evidence sessions took place before the publication of the Scottish Government's [Draft Heat in Buildings Strategy](#). It would have been helpful to have had the Strategy to hand when we took evidence. However, we understand the challenges the Scottish Government has faced because of the covid-19 pandemic, which contributed to a delay in its publication.

The targets set out in the Update are ambitious. It is natural to focus in any analysis on areas where stakeholders raised doubts or called for increased clarity but it is important to make clear at the outset that the Update was welcomed and there was general support for its proposals. The breadth of ambition set out in the proposals was, on the one hand recognised as challenging, but also as one of the main strengths of the Update.

It was also widely agreed in evidence that, while the Update set out a general direction of travel, detail was sometimes lacking and that stakeholders – including the public – would need more 'stepping stones' to guide them towards the right outcomes. Points made in the annexe are reflective of the evidence we received at the time, but we hope the Strategy might help shed some further light.

Everyone who gave evidence agreed that meeting the ambitions set out in the Update requires transformational change. Leadership at political and institutional level is crucial, but this should not be a purely a "top-down" project. There is a need to drive change at a practical and personal level, especially as homes and place-making are very relatable issues. The Scottish Government has rightly set effective communication at the heart of the strategy. The aim should be help people feel informed and empowered, and that they can be part of the solution.

For instance, in a country with so much older housing stock still in use - including our iconic and much valued tenement stock – the challenge of retrofitting domestic properties so as to reduce their carbon footprint is an important issue. This requires a national conversation, conducted in clear, easy to grasp language. Whilst major challenges exist, and should not be shirked, the conversation should also be framed in positive terms, stressing the opportunities there are to do things differently, for instance through technological advances. There are good news stories out there.

The pandemic has taken a huge toll but also shed light on different ways of doing things that no longer seem as remote or unlikely as they did a year ago. As the nation went into a lockdown, we saw the almost immediate environmental improvement from less transport on the road, and the disappearance of rush hour. Digital platforms evolved at speed and, for many, home working has become the new normal. There is an opportunity to explore this new relationship with how we live and work through the lens of decarbonisation.

We hope the Committee response is useful for the Scottish Government's future thinking and can feed into the next full Climate Change Plan due in 2025. And we look forward to the debate on Tuesday 9 March where the Parliament will explore all the conclusions of all four Committees that scrutinised the Update.

Your sincerely

James Dornan MSP
Convener of the Local Government and Communities Committee

CC:

Roseanna Cunningham, Cabinet Secretary for Environment, Climate Change and Land Reform

Kevin Stewart, Minister for Local Government, Housing and Planning

Gillian Martin, Convener, Environment, Climate Change and Land Reform Committee

Gordon Lindhurst, Convener, Economy, Energy and Fair Work Committee

Edward Mountain, Rural Economy and Connectivity Committee

Buildings chapter: overview

The Buildings Chapter sets out ambitious targets:

- Emissions from heating all buildings across Scotland need to reach zero by 2045
- A statutory fuel poverty target for 2040 requiring that no more than 5% of households are fuel poor; that no more than 1% of households are in extreme fuel poverty; and the fuel poverty gap is reduced to £250. There are also interim targets for 2030 and 2035. Currently 24.6% of households are fuel poor, and 12.4% are in extreme fuel poverty
- A change to the type of heating used in over 2 million homes and 100,000 non-domestic buildings by 2045 moving from high emissions heating systems, reliant on fossil fuels, to low and zero emissions systems such as heat pumps, heat networks and potentially hydrogen.
- An interim statutory target of a 75% emissions reduction by 2030 requiring a rapid acceleration of heating system conversions during this decade
- An estimation of around 50% of homes, or over 1 million households, will need to convert to a low carbon heating system by 2030. Furthermore, up to an additional 50% of non-domestic buildings will need to be converted to low and zero emissions heating by 2030.

The Update states that the Scottish Government's **early actions to 2025** will focus on increasing deployment rates of zero and low emissions heating through three broad mechanisms:

A. standards and regulation;

B. significant investment, including scaling up delivery programmes; and

C. supply chain support (with a Supply Chain Strategy for energy efficiency and heat in buildings published in 2021)

Buildings- key Committee findings

Standards and regulations for newbuilds

The Update states that Scottish Government will introduce a standard requiring all new homes consented from 2024 to use zero emission heating. Witnesses welcomed this but agreed the performance gap between standards and enforcement

must be addressed. Sam Foster told us that 95% of modern buildings constructed fail to satisfy current minimum building standard regulations regarding energy efficiency. We heard views that there should be a buildings “MOT” for newbuilds, with emissions monitored at least every five years.¹

The Existing Homes Alliance Scotland talked about the lag between new regulations being introduced and their starting to “bite”, i.e. having effects on the ground. They therefore proposed bringing the new build standard forward to 2022.²

We discuss retrofitting below but noted how witnesses asked about it stressed the importance of getting it right first time with newbuild stock, to avoid any costly “refurbishment nightmare” further down the line. Some witnesses said addressing climate change presented an opportunity to address short-termism and to build better. Sam Foster told us that the current design life of a new home build is approximately 60 years, whereas past generations built homes to last 100 or 200 years. We note the durability of buildings is directly relevant to the discussion of embodied energy below: there is likely to be less embodied energy in one building that lasts 180 years than three that last 60 years each even if the initial cost (in terms of both carbon and money) is higher.³

The Committee welcomes the introduction of rigorous new standards on zero emission heating. We ask the Scottish Government to respond to views that the date of implementation should be brought forward to ensure that they “bite” earlier.

We ask the Scottish Government to clarify what other opportunities are available to tighten up building standards to ensure we build durable buildings.

The Scottish Government must ensure that more rigorous standards translate into facts on the ground. In prior work in this session, we have drawn attention to gaps in the verification process.⁴ More recently, we called for national leadership in building standards and enforcement, to support council departments, counter a cost-cutting and short-termist culture in parts of the construction trade, and ensure that rule-breaking has consequences.⁵ These comments were made primarily in the context of fire safety but they are equally valid in the context of the industry’s role in combatting climate change.

¹ Official Report 27 January 2021, Col 6

² Official Report 27 January 2021, Col 31

³ Official Report 27 January 2021, Col 12

⁴ [Buildings Regulations and Fire Safety in Scotland](#), paragraph 82

⁵ [Correspondence to Minister for Local Government, Housing and Planning](#)

Embodied Energy

Stakeholders told us that the Update did not appear to them to take account of ‘embodied energy’, i.e. the total carbon footprint involved in construction or refurbishment, adding up the impact of labour, cement, steel, wood or other materials used, and all related transport impacts measured in carbon. The Rural and Islands Housing Association Forum gave the hypothetical example of a heat pump installed in Unst. There is a notional saving from installing the pump but the considerable carbon cost of bringing the materials to the island (and of its regular maintenance) would not appear to be part of the calculation.⁶

The Committee invites the Scottish Government to clarify whether the Update takes account of embodied energy costs.

Existing stock: retrofitting challenges

The Update indicates progress on upgrading the energy efficiency of Scotland’s building stock ‘with 45% of homes now achieving Energy Performance Certificate Band C or better.’⁷ In view of this, witnesses called for further acceleration, proposing that all buildings meet Energy Performance Certificate C by 2030 instead of 2035. We heard views that home owners should retrofit their house at the point of sale to raise the energy efficiency standard.⁸

Whilst significant progress has been made, witnesses agreed that reducing the carbon footprint of existing stock would be one of the biggest challenges under the Updated Plan. Our existing stock is diverse, and much of it is older housing stock – still generally much in demand, despite higher heating and upkeep costs. Rural housing raises particular challenges. There was a general view that the Update lacked detail on how all this would be addressed.⁹

It was clear from the evidence that methodology and practice on effective retrofitting of insulation is a work in progress and is not risk free. Examples were given of interventions that made things worse not better for householders. Nor does it come cheaply, with householders commonly being quoted thousands of pounds for improvements. Witnesses therefore welcomed the emphasis on training and upskilling in the Update.¹⁰

We discussed with witnesses the challenges of retrofitting rural housing, where there can be transport issues and economies of scale are usually lacking. The Existing Homes Alliance told us that historically it had been placed in the “too difficult” box—too expensive, too hard or too complicated.’ They called for a ‘rural transition package’ – a mixture of skills training and householder incentives — as part of future engagement in rural areas.¹¹ Sam Foster said that ‘organisations such as

⁶ Official Report 27 January 2021, Col 41

⁷ CCPu, page 92, 3.2.4

⁸ Official Report 27 January 2021, Col 10

⁹ Official Report 27 January 2021, Col 9

¹⁰ Official Report 27 January 2021, Col 9

¹¹ Official Report 27 January 2021, Col 40

development trusts and community trusts can be incredibly powerful in galvanising groups of people to get together to do things communally.¹²

COSLA told us that ‘substantial financial support’ is required in the cases where occupants will be required to vacate their homes to allow for retrofitting work.¹³

We note that the Draft Heat in Buildings Strategy (published after our evidence sessions) states:

We propose to extend our financial support for our most remote rural and island off-grid communities, ensuring that security of supply is maintained and decarbonised – acting across electricity, heat and energy efficiency –helping to transition these communities to a net zero future.¹⁴

We also discussed with witnesses the challenge in upgrading and retrofitting the 800,000 tenement households across Scotland. Witnesses agreed that the need for consent on common repairs could be a major barrier to achieving progress¹⁵. The Draft Heat in Buildings Strategy has since stated:

we will consult on introducing regulation to require mixed tenure and mixed-use buildings such as tenement s to reach a good level of energy efficiency¹⁶

Achieving further decarbonisation of our existing housing stock will be one of the main challenges under the Climate Change Plan Update. The Draft Heat in Buildings Strategy is a good first step as we welcome proposals to extend financial support in rural areas.

However, the Committee believes more detail is needed on the practicalities of rolling out improvements in our diverse housing stock, with a focus on sharing good practice on this developing discipline. More detail is also needed on how home-owners will be incentivised, and persuaded this in their interests.

The Committee would welcome reform of the law on common repairs in tenements (including costs recovery) in the next session of the Parliament, to help expedite interventions that will improve energy efficiency. We ask the Scottish Government to clarify what its initial proposals are in this area.

The Climate Change Plan and Scottish Households

Witnesses agreed on the importance of households feeling invested in the Plan, and that it would work for them, especially less well-off households. The Energy Saving Trust welcomed the way the Update integrated the dual challenges of fighting fuel

¹² Official Report 27 January 2021, Col 19

¹³ Official Report 17 February 2021, Col 41

¹⁴ Draft Heat in Buildings Strategy, page 85

¹⁵ Official Report 27 January 2021, Col 14

¹⁶ Draft Heat in Buildings Strategy, page 16

poverty and climate change¹⁷. The Existing Homes Alliance Scotland said it would be essential to ensure decarbonisation does not exacerbate fuel poverty and that the ‘whole house approach is also the most effective way to minimise both cost and disruption.’ They called for the Scottish Government should double its funding for energy efficiency and fuel poverty programmes to maximise their impact and support the green recovery¹⁸.

Witnesses also welcomed the commitment towards increased public engagement set out in the Update. A number of stakeholders commented on the low public awareness of energy efficient heating technology and methods (e.g, heat pumps) and how this was an everyday barrier to decarbonisation. The Energy Saving Trust said—

... ‘available evidence suggests that there is low general awareness amongst the population of the need to improve the energy efficiency of their homes and to switch away from conventional heating as well as very low awareness of how people can take action’.¹⁹

Some witnesses also commented that this low public awareness also extended to the financial incentives and grants available to the public to assist with improvements to their homes. Elizabeth Leighton told us—

‘The engagement strategy should not just be about raising awareness. It is about providing people with support and holding their hands through the process of thinking about such a heating system, installing it and using it, because we know that it is only by understanding how best to use the system that people will get the maximum benefit in terms of carbon, savings and comfort.’²⁰

We note that the Draft Heat in Buildings Strategy (published after our evidence sessions) states:

In order to support people as we accelerate the transformation of our building stock, we will expand our support offer on energy efficiency and zero emissions heating, including continuing to offer interest -free loans with cashback, and growing our advice services and support to access funding and finance. We will implement a public engagement strategy and action plan for heat decarbonisation to enable people to actively participate in shaping the decisions that affect them, and will use Local Heat & Energy Efficiency Strategies to help ensure locally-tailored solutions.²¹

The Committee welcome the Scottish Government’s commitment to implement a public engagement strategy and action plan for heat decarbonisation, and the additional detail provided in the Draft Heat in Buildings Strategy.

¹⁷ [Written submission from Energy Saving Trust](#)

¹⁸ [Written submission from Existing Homes Alliance Scotland](#)

¹⁹ [Written submission from Energy Saving Trust](#)

²⁰ [Written submission from Existing Homes Alliance Scotland](#)

²¹ Draft Heat in Buildings Strategy, page 8

Planning

The Royal Town Planning Institute Scotland told us they were disappointed only one page in the Updated Plan was expressly dedicated to planning. Their witness told us

... it misses the point about the role of place. Although we are talking about buildings today, buildings sit in a context, and there is a need to think about how we can address that. Although greenhouse gas emissions for buildings represents around 20 per cent of emissions, how people travel between and use those buildings accounts for a larger proportion of greenhouse gas emissions—it is about 36 per cent.²²

The RTPI said they wanted reassurance that the Plan would have sufficient recognition of “where buildings sit, how they relate to one another and how people relate to them.”²³

The importance of improving access to, and provision of, green spaces was raised by the RTPI in written evidence, stating that ‘parks, public gardens and other open spaces should be integrated into strategic plans for critical green and blue infrastructure...while delivering multifunctional benefits such as flood mitigation, cooling, air quality, active travel, biodiversity gains, habitat creation and space for urban agriculture.’²⁴ Furthermore, the RTPI touched on the ‘20-minute neighbourhood’ concept – featured in National Planning Framework 4 position statement, but not within the Updated Plan - as a driver of decarbonisation. The idea of neighbourhoods where residents can access jobs, services and shops on foot, or by bike, within 20-minutes is seen a positive tool towards the zero-carbon targets.²⁵

COSLA suggested local government can improve planning and housing developments in their areas by giving councils more flexibility to impose low carbon-friendly conditions on developers.²⁶

Proactive Planning

The RTPI also argued that the planning system should become more proactive, shifting from a perceived focus on processing individual planning applications to establishing a vision for the development of our places, with the aim of then facilitating the delivery of that change. This would require engagement with communities and developers to shift from the current site-specific focus to collaboratively developing a shared vision for the sustainable development of wider locales.²⁷

²² Official Report 27 January 2021, Col 23

²³ Official Report 27 January 2021, Col 24

²⁴ [Written submission by RTPI](#)

²⁵ Official Report 27 January 2021, Col 32

²⁶ Official Report 17 February 2021, Col 42

²⁷ Official Report 27 January 2021, Cols 29

The Royal Town Planning Institute Scotland suggested a move away from ‘set-piece one-off consultation exercises’. They ask to create a space for dialogue that is flexible and can respond to the needs of the people. The Committee heard that a key mechanism for public consultations is the ‘local place plans’ that was brought in by the Planning (Scotland) Act 2019, which allow communities to develop their own ideas. We heard it would be advantageous to bring the developers and communities together at an earlier stage.²⁸

The Committee supports calls for a national policy focus on place, wellbeing and the delivery of related policy goals, such as 20-minute neighbourhoods and that the Plan could do more to reflect this national policy as mentioned in the National Planning Framework 4 position statement.

The Committee recommends that the Scottish Government provide local authorities with the resources required to support effective “front-loading” of public engagement in planning. This could include support for the development of local place plans, collaborative sessions and other innovative public engagement processes.

Local Government

COSLA expressed their support for the ambitions set out in the Update and we heard of their determination in helping the Scottish Government achieve its goals of net zero by 2045. They stated that there is no precedent to achieving the goals set in the next 20-30 years in terms of the decarbonisation of society and local government plays a central role in coordinating communities and public life towards a net zero society.²⁹

Training / upskilling

In their written evidence COSLA highlighted local government’s role in devolving future skills needs of both young people and businesses, in addition to being one of Scotland’s largest employers. They called on further investment in leadership skills and carbon literacy.³⁰ The Committee heard of a significant need to upskill staff across all local authorities. This requires more than just funding but an expansion in local authority’s organisational capacity to meet this challenge.³¹

Funding

A constant thread throughout COSLA’s evidence centred around additional funding and flexibility to develop their programmes. COSLA told us they can do more to tackle climate change if they had increased funds and highlighted cuts in services such as economic development, which are active in supporting innovation and

²⁸ Official Report 27 January 2021, Cols 30

²⁹ [Written evidence from COSLA](#)

³⁰ [Written evidence from COSLA](#)

³¹ Official Report 17 February 2021, Col 38

activities around climate change but are non-statutory.³² They recognise they need to become 'net zero' bodies through their own working practices and effective improvements to their buildings and estates. There was, however, concerns that the scale of the ambitious in the Update can't be met within local authorities' current capacity. COSLA said Local Government should be empowered and equipped to 'invest beyond those set aside for national programmes.' They added 'local government needs to be resourced adequately and have flexibility to meet local needs, in line with the Paris Agreement which calls for national governments to properly resource and empower local and regional government to meet their climate change ambitions.'³³

Cllr Heddle told us there has never been a support scheme for heat pumps, which can be a more practical low-carbon heating solution in more remote and rural areas. He suggested this was an oversight.³⁴

COSLA explained the varying challenges local authorities face highlighting rural authorities will take a different approach to climate change than those that govern cities.³⁵The Committee was told that ringfenced funding that doesn't allow for innovation to tackle the challenges that differ across all 32 council areas.

We note the Draft Heat in Buildings Strategy states (published after our evidence sessions):

We will work with local government... setting out a plan for all areas of Scotland, and work with local communities to design tailored solutions, matched to local circumstances.³⁶

Engagement

We heard evidence on public engagement and the mechanisms local government use; surveys, focus groups talks, throughs schools and online platforms. COSLA told us that the pandemic has confined local government's outreach programmes to digital platforms. COSLA called on further discussions and support with its partners to develop a more thorough and collaborative role of engaging with communities on climate change.³⁷

We note the Draft Heat in Buildings Strategy states (published after our evidence sessions):

We set out the importance of working with individuals and communities, to secure this transition in a way that works with, and for, people. Local

³² Official Report 17 February 2021, Col 38

³³ [Written evidence from COSLA](#)

³⁴ Official Report 17 February 2021, Col 42

³⁵ Official Report 17 February 2021, Col 36

³⁶ Draft Heat in Buildings Strategy, page 3

³⁷ Official Report 17 February 2021, Col 46

government will be a key partner in achieving delivery on the ground. We will continue to work with COSLA to strengthen and integrate governance arrangements on heat and energy efficiency, to ensure effective delivery over the long term.³⁸

The Committee asks the Scottish Government to work with local government and develop a training strategy that will upskill their workforce.

The Committee recognises the Scottish Government's commitment in the Draft Heat in Buildings Strategy that states it will work with local government to design solutions tailored to their circumstances. The Committee ask the Scottish Government to consider more flexibility around local government funding that will also allow each local authority to meet the needs unique to his area in relation to decarbonisation.

³⁸ Draft Heat in Buildings Strategy, page 141