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Document Title	Draft Scotland's Climate Change Plan 2026-2040 – East Lothian Council's Response

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Designation	Head of Development
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MEETING DATE:	3 January 2026
BY:	Head of Development
REPORT TITLE:	Draft Scotland's Climate Change Plan 2026-2040 – East Lothian Council's Response
REPORT STATUS:	Public

1 PURPOSE OF REPORT

- 1.1 To advise Members of East Lothian Council's response to the draft *Scotland's Climate Change Plan (CCP) 2026-2040* using the consultation respondent's information form.

2 RECOMMENDATIONS

Members are recommended to:

- 2.1 Note the Council's response to the consultation. The response is set out in Appendix 1.

3 BACKGROUND

- 3.1 On 6 November, 2025 the Scottish Government published a draft of *Scotland's Climate Change Plan 2026-2040*. Consultation on the draft Plan was open until the 29 January, 2026.
- 3.2 The draft Plan sets the policy context, explains the national 5-year carbon budgets between 2026 and 2045, and provides sectoral carbon budgets across: Buildings; Transport; Waste; Energy Supply; Business and Industrial Processes; and Agriculture and Land Use, Land Use Change and Forestry. It also sets out policies to decarbonise those sectors and stay within the 5-year carbon budgets.
- 3.3 East Lothian Council's response focuses on the emissions sectors which make up the Plan and on relevant just transition questions. It suggests numerous areas for improving the Plan and for some sectors concludes

that the proposals in the Plan may not be sufficient to stay within the national carbon budgets. The Council's response also suggests ways that monitoring of the Plan could be improved and points out possible risks with the proposed approach.

- 3.4 East Lothian Council's response also suggests that the draft Plan should have more details for delivery. At present, the draft Plan has high-level costs and policies linked to emissions reductions. The policy commitments are occasionally self-referential, in that the commitment is to develop a new policy. This will make it more challenging for the Council corporate and area-wide emissions reductions. It will also create budgeting challenges because it does not clarify timescales, resources, and targets that the Council will have.

4 POLICY IMPLICATIONS

- 4.1 There are no policy implications directly arising from the Council's response to this consultation. However, there will be implications for Council services when the final Climate Change Plan is published and delivery details are made clear.

5 RESOURCE AND OTHER IMPLICATIONS

- | | | |
|-----|-------------------------------|------|
| 5.1 | <u>Finance:</u> | None |
| 5.2 | <u>Human Resources:</u> | None |
| 5.3 | <u>Other (e.g. Legal/IT):</u> | None |
| 5.4 | <u>Risk:</u> | None |

6 INTEGRATED IMPACT ASSESSMENT

- 6.1 ***Select the statement that is appropriate to your report by placing an 'X' in the relevant box.***

An Integrated Impact Assessment screening process has been undertaken and the subject of this report does not affect the wellbeing of the community or have a significant impact on: equality and human rights; tackling socio-economic disadvantages and poverty; climate change, the environment and sustainability; the Council's role as a corporate parent; or the storage/collection of personal data.

X

or

The subject of this report has been through the Integrated Impact Assessment process and impacts have been identified as follows:

☐

Subject	Impacts identified (Yes, No or N/A)
Equality and human rights	
Socio-economic disadvantage/poverty	
Climate change, the environment and sustainability	
Corporate parenting and care-experienced young people	
Storage/collection of personal data	
Other	

7 APPENDICES

- 7.1 Appendix 1: East Lothian Council's response to the draft *Scotland's Climate Change Plan 2026-2040*

8 BACKGROUND PAPERS

- 8.1 Draft *Scotland's Climate Change Plan 2026-2040*:
<https://www.gov.scot/publications/scotlands-climate-change-plan-2026-2040/documents/>

9 AUTHOR AND APPROVAL DETAILS

Report Author(s)

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Date	29 th January, 2026

Head of Service Approval

Name	Keith Dingwall
Designation	Head of Development
Confirmation that IIA and other relevant checks (e.g. finance/legal) have been completed	Yes
Approval Date	29 th January, 2026

Respondent Information Form

Please Note the respondent form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:
<https://www.gov.scot/privacy/>

Respondent Information Form

Are you responding as an individual or an organisation?

- ☐ Individual
- ☒ Organisation

Full name or organisation's name

East Lothian Council

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- ☒ Publish response with name
- ☐ Publish response only (without name)
- ☐ Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are

you content for Scottish Government to contact you again in relation to this consultation exercise?

☒ Yes

☐ No

Where do you live most of the time?

How would you describe your local area? [SG Classification: Large Urban, Other Urban, Accessible Small Town, Remote Small Town, Accessible Rural Area, Remote Rural Area, Island*, Other (specify)]

*We have included a separate category for island residents in recognition of the potential impacts of decarbonising Transport on these communities.

Accessible Rural Area

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy (required)

☒

Questionnaire

Section 1: Delivering a Just Transition

The following questions concern the Delivering a Just Transition section of the Plan, more specifically: communities, skills, workforce, employers and adapting to climate change.

Question 1

What are your views on our approach to delivering a just transition for people and communities?

The Plan only sets out a road map until 2040, which creates the potential for several moral hazards. The reliance on negative emissions technologies means that the Plan relies on technologies which are not yet proven or economical at scale, assuming that they will be in the future. However, because there is no certainty surrounding these technologies, it creates the real possibility that the transition will be much more expensive and ineffective than anticipated. By leaving some of the most challenging transitions to 2040, it does not meet the principle set out in the *Statutory Guidance for Public Bodies* that the most effective emissions reductions should take place early so that cumulative emissions are lower and there is less overall global warming. Given the timeline of the Plan and the scope of the ‘reset’ after abandoning prior emissions targets, this is *the* generational window to have a robust and credible plan to reach net zero by the target date of 2045, but the Plan lacks detail in key areas.

Question 2

We recognise that workers face particular impacts from the Plan and we have outlined our approach to supporting the transition of the workforce, including skills for jobs. What skills, training and qualification provisions will be most important in a net zero future and what more could be done to support them?

In addition to future skills and innovation, there will be a continuing need for traditional skills such as stonemasonry, joinery, and farming. Scotland must continue to use its existing building stock as much as possible to minimise embodied carbon, and they will be impossible to retrofit correctly without traditional knowledge and skills. Resilient and nutritious domestic food production will also be critical to reduce the nation’s emissions from consumption, and this will require sustainable land management and regenerative agriculture. Achieving a sustainable food system will require upskilling along with the knowledge and resources to keep farming viable.

Question 3

The Plan will bring opportunities and challenges for businesses and employers. How can we best support employers across the private, public and third sectors to make the changes needed and seize the benefits of net zero?

Clarifying the delivery element of the Plan as soon as possible will be critical for local authorities. We must know what levels of funding will be required and by when, and we must know if that funding will come from the Government. We must have clarity about our responsibilities for pace and scale of delivering the energy transition so we can budget accordingly. The current year-on-year funding cycle is not sustainable and will not allow local authorities to scale up decarbonisation in time to meet net zero by 2045.

Funding for climate action and decarbonisation comes *ad hoc* and varies from year to year. Switching to low-carbon technologies for public buildings and public sector fleets is not yet economical, such that public bodies can lock into emitting technologies for an entire replacement cycle, which will make meeting future carbon budgets more challenging. With multi-year funding across sectors, we would be able to budget for and accelerate replacements.

Question 4

Our approach recognises that some of the Plan's impacts will have greater implications for particular regions of Scotland. What are your views on our approach to supporting places where the transition presents particular regional impacts?

This element of the plan could be strengthened by making community benefits from renewable energy robust and mandatory. Under current schemes, significant populations of East Lothian will experience detriment to their area and are at risk of not being adequately compensated. Community benefits should be index linked and backdated so that those who live in rural areas and bear the brunt of the energy transition's impacts benefit from the transition. An even better solution would be making community ownership an integral part of renewable energy development from the outset, which would not only increase buy-in and alleviate opposition to renewable energy generation but link the prosperity of Scotland to the decarbonisation of the entire nation.

Section 2: Sectoral contributions, Policies and Proposals

The following questions concern the Sectoral contributions, policies and proposal sections of the Plan.

Buildings (Residential and Public)

Question 5

How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?

As written, the proposals in the Plan do not have sufficient detail to deliver decarbonisation of homes and buildings. Some of the proposals are likely to slow down decarbonisation, such as setting the target for heat to decarbonise 2045, which creates more emissions and more room for error than a 2040 target would. The same is true of changing the prohibition of fossil fuel heating to a target, which is unlikely to succeed without a clear pathway for delivery and support for enforcement.

Across all proposals, there is a lack of clarity and detail which does not provide certainty to industry, homeowners, or local authorities. For example, there needs to be a timeline and mechanism for the new EPC standards (while cautiously welcomed) to result in lower carbon emissions for all building types, especially clarifying how EPC compliance will be monitored and enforced.

The Heat in Buildings Strategy & Delivery Plan should also have been in place before Councils wrote their Local Heat & Energy Efficiency Strategies so they could correctly align with timescales for efficiency standards and low-carbon heat delivery. A more effective mechanism for EPC refresh cycles would be to require an update when a change is made to the fabric or heating system of a building rather than time-based.

Proposals in the plan would be improved by having costed delivery, timescales, and enhanced powers and resources. It would also be an improvement to shift existing decarbonisation schemes to multi-year funding cycles, which would enable medium-term planning and meaningful change.

Question 6

How can clean heating systems (such as heat pumps) be made more affordable for everyone?

The proposals as written without a strong delivery component are not likely to improve industry confidence or encourage skills and supply chain development.

Heat networks should be categorised as a utility. Under current conditions, heat networks can encounter barriers to building, development, and connection that make the final heat cost prohibitively expensive. Proposals should include a shift to multi-year support funding for heat networks so that projects can be developed at scale.

All new obligations on local authorities for compliance and enforcement must be resourced or it will put further pressure on public finances. Proposals such as net zero standards for social housing must not result in the delivery of fewer affordable homes. Nor should obligations like shorter EPC refresh cycles, which must be affordable and supported by skilled labour.

There is not enough in the Plan to support community energy, including capacity building and lowering barriers. Renewable energy can become not only affordable but profitable when led and informed by communities.

Transport

Question 7

Which of the following would be most effective in enabling you to transition your vehicle(s) to zero emissions alternatives? Please rank your choices from highest to lowest priority, where 1 is the highest priority. Please only give one ranking to each option:

If you're responding for an organisation: you may want to consider car fleets as well as HGV fleets.

- ☐ Cost of new zero emissions vehicles needs to come down
- ☐ Cost of used zero emissions vehicles needs to come down
- ☐ Reliable infrastructure for vehicles (such as fuel or charging networks)
- ☐ Noticeably cheaper running costs (including electricity, maintenance and insurance)
- ☐ Convenient access to public charging infrastructure
- ☐ Ensuring an adequate number of trained mechanics available to perform essential maintenance and repairs
- ☐ Access to funding support /low cost finance
- ☒ All of the above
- ☒ Other (use box below)

Lower-cost vehicles, access to funding, and trained mechanics will be most important for our corporate transport emissions. However, local authorities also have a responsibility for area-wide emissions and all of the above will be critical for residents.

Not all measures to tackle the above need to be costly. For example, adequately covering electric vehicles with insurance can be enabled by updating legislation, which will also lead to proliferation of more charging infrastructure.

Question 8

How can the Scottish Government support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?

The shift to multi-year funding for the Bus Infrastructure Fund is welcome – this would also be useful for the Active Travel Infrastructure Fund.

New obligations on local authorities, such as the real-time bus timetables, must be fully supported and may be better delivered regionally. It also remains unclear what a place-based delivery plan (Proposal 3) for behaviour change and car use reduction looks like and whether these plans will align with Local Development Plan timescales. Plans must align with realistic public transport provision or be accompanied by significant new powers & resources to deliver. It is not specific enough what the powers, aims, and resources behind these plans will be.

Nationalised active travel routes like trunk roads. ‘Trunk paths’ or ‘trunk cycle routes.’ This will protect travel between key destinations.

Question 9

What action by the Scottish Government would be most helpful in supporting you to live a more climate-friendly lifestyle?

It is unlikely that the proposals in the Plan will be sufficient to meet carbon budgets. Several of the key proposals are not value-adds over and above UK legislation, despite Scotland having unique transport challenges. What is not unique is that the expansion of vehicle charging infrastructure –which is welcome- should focus on affordable overnight charging for residents who cannot charge at home.

Road user charging is inadequate as the primary instrument that is planned to reduce car mileage at a local level. Putting the ‘option’ to implement road user charging on local authorities also functionally makes road emissions the solitary responsibility of those authorities, even if there are few roads that would be suitable. There is the potential for massive duplication if each Council is expected to create their own scheme.

The new proposed car mileage reduction target is more realistic than the prior target, but it is not clear what the baseline is or if it accounts for population growth. Like other proposals, it is not specific enough how the targets will be met through public transport and modal shift or where responsibility for meeting the target lies.

Targets relating to decarbonising public sector fleets, including HGVs and buses, must weigh up current market conditions. Zero emissions HGVs and buses remain unaffordable on the market, so bus operators and local authorities must be appropriately supported to keep school and local routes viable.

Waste

As written, the proposals are unlikely to be sufficient to meet carbon budgets set out in the Plan. To improve the Plan, the landfill ban on biodegradable municipal waste should be expanded to non-municipal waste and other waste streams which ought not to go to landfill as suggested.

The mandate for local authorities to handle soft plastics will require additional resource, as will implementation of the statutory circular economy strategy. Other proposals such as the commercial waste review and digital waste tracking may also result in increased costs and challenging decisions for local authorities.

Statutory targets for waste must undergo consultation, which should also include any new requirements under the Product Stewardship Plan so that Councils can model the impact on service delivery, and any impacts must be feasible for Councils to meet.

Few proposals indicate that the Plan will significantly reduce overconsumption. Proposals such as the Deposit Return Scheme & Residual Waste Plan are welcome but overdue, and few of the proposals are aimed at changing what is ‘on the shelves,’ which should be the top of the waste hierarchy.

Question 10

Are there any additional proposals to support waste sector emission reduction that should be considered across the following 5 areas:

- Strengthen the circular economy
- Reduce and reuse
- Modernise recycling
- Decarbonise disposal
- Other emission sources (including waste water and anaerobic digestion)

Energy Supply

Question 11

What are your views on Scotland generating more electricity from renewable sources?

The entire UK must generate more renewable electricity to support electricity demand from electrified transport, heating, and cooking, and Scotland will be an important contributor.

However, renewable electricity generation should be locally-focussed. As energy production moves from overseas to on and around our shores, there is an opportunity and an obligation to share profits with the communities live with generation on their doorstep. This starts with improving the value of community benefits, reverse engineering the value to the index-linked equivalent of £5,000 per MWh when the standard was first introduced. Shared ownership with the community should also be a statutory part of energy generation. Community benefits should also be expanded to offshore energy generation as soon as possible. Improving these practices would create a policy hook to allow local authorities to develop community benefits positions in planning.

Renewable generation of electricity must occur at all levels, from macro-scale wind farms to individual dwellings. In domestic and commercial settings, users should be enabled to generate their own energy because it saves their energy bills, contributes to decarbonisation, and local generation is also more efficient.

There must be leadership in the sector, including clear pathways and timescales for delivery. This would create industry confidence, and clear expectations of where and how infrastructure is located for communities and Councils. It would enable development to be supported by grid capacity.

Business and Industrial Processes

Question 12

What support do industries need to reduce their carbon emissions while remaining competitive?

To reduce emissions while remaining competitive, businesses in East Lothian will require a coordinated package of support spanning affordable low carbon energy, investment, skills, clear regulation and access to expert help to assist in the production of deliverable strategies and action plans. Affordable and reliable electricity, alongside future access to hydrogen, is essential for electrification and fuel switching, particularly given existing grid constraints that already limit business expansion.

Capital support will be vital particularly to help rural and SME dominated sectors meet new energy efficiency and heating requirements, where older premises and limited cashflow present significant barriers. A strong pipeline of local skills and retraining opportunities; in engineering, construction, energy efficiency and related trades, is necessary to ensure employers can adopt low carbon technologies without facing labour shortages or rising costs. Tailored SME advice, simple grant schemes and clear guidance on regulatory changes will help smaller businesses manage the transition. Finally, predictable, well phased regulation and adequate planning capacity will give all sectors the certainty they need to invest confidently in decarbonisation.

The Plan's reliance on negative emissions technologies (NETs) is a risk, when technologies are not yet proven or economical at scale. To this point, the Plan contains a graphic which seems to indicate that, by Carbon Budget 3, emissions from Industry will be outweighed by removals from NETs. However the scale and numbers on the graph clearly show that business & industry emissions will still be greater by the end of the Plan's lifecycle. This may mislead businesses and the public to assume that carbon capture can enable continuing at current levels of emissions. In fact, there is not sufficient detail to explain how NETs will remove negligible emissions in 2030, but see a fifty-fold increase in 10 years.

Firms need clarity –not obfuscation- on national CCUS and NETs infrastructure, for local manufacturing and construction supply chains to remain competitive. The Plan should also demonstrate how they reach 'net zero' and not 'carbon neutral' by decarbonising to the maximum extent and only relying on technology to remove emissions that cannot be avoided.

Agriculture and Land Use, Land Use Change and Forestry (LULUCF)

Question 13

How can the Scottish Government encourage sustainable land use, that is also productive for local communities?

Proposals should ensure that public funding supports practices which restore nature and avoid funding unsustainable practices. Strengthening incentives through agricultural subsidies would help deliver both environmental benefits and tangible value for local people. Long-term maintenance must be built into any intervention so that restored habitats, infrastructure, and land improvements continue to function effectively over time.

Improving sustainability literacy across land managers and owners, as well as communities, is essential. By clarifying what nature-based solutions are, who delivers them, and how they are funded, the Scottish Government can make them business as usual.

Policies and funding should also be used as instruments to encourage paths and active travel connections, which are also sustainable uses of land.

Question 14

What do you think about our proposals for planting trees and restoring natural habitats like peatlands?

The Plan's proposals do not have sufficient detail for delivery. The Plan should link interventions to specific emissions reductions, outline how long-term maintenance will be secured, and explain where funding will come from. The focus on woodland creation is too narrow – it overlooks the need for a wider range of interventions including urban trees, hedgerows, blue infrastructure, and the restoration of marine habitats. The proposals also repeat actions that are set out in other strategies, resulting in duplication: there is very little that is new in this Plan and it is therefore feared that the proposals do not sufficiently link the climate & nature emergencies.

Stronger national coordination and cross-sectoral working are needed to deliver meaningful nature recovery. This includes addressing gaps around workforce capacity and pay in nature-based jobs, ensuring the sector can attract and retain skilled people.

Question 15

How can the Scottish Government support farming to become more climate-friendly while continuing to support food production and improve biodiversity?

Farming will need continuing support and capacity building to remain viable. One avenue for this is by leveraging the natural capital on agricultural land, which the Plan does not seem to take full advantage of.

Section 3: Impact Assessments

The following questions concern the Business and Regulatory Impact Assessment (BRIA), Child rights and wellbeing impact assessment (CRWIA), Island Communities Impact Assessment (ICIA), Equality Impact Assessment (EQIA), Fairer Scotland Duty Assessment (FSD). The purpose of these impact assessments is to understand the effects of government policy on specific groups, including children and young people, island communities, business and equalities groups.

Question 16

Which groups or communities do you think will be most affected by the transition to net zero, and in what ways?

In East Lothian, the communities currently seeing the most impact from renewable energy development are in rural uplands and in towns near battery storage sites. There is disruption from construction, noise from the turbines, and concerns about fire risk from battery storage.

The siting and design of renewable energy systems must in future be co-designed with local communities, who should also be allowed and encouraged to a share of the profits and benefits. See ELC's response to the consultation on community benefits from energy for more details.

Question 17

How do you think the Climate Change Plan aligns with existing local, regional, or national priorities that you are aware of or involved in?

By including a focus on delivery, the Plan could be better aligned to local and regional climate plans. The *Draft Statutory Guidance for Public Bodies* sets out that in Climate Change Plans, interventions should be linked to specific emissions reductions. If this is expected of local authorities, it would be useful for the Scottish Government to also clear this hurdle. Local authorities are using a software called ClimateView to plan reducing area-wide emissions, but we neither know how much emissions will be reduced through national legislation, nor what powers and resources we will have to deliver on emissions reductions in the next 14 years.

The *Statutory Guidance* also suggests that interventions should be costed individually. While the Plan provides an overview of costs and benefits across the entire suite of actions, readers – including local authorities – are not able to parse out the cost breakdown by policy or even by sector. Some proposals across Buildings and Waste could introduce onerous and costly new requirements on local authorities, which have clearly been worked out to give an overview of costs & benefits. It would be useful to know who bears those costs and from which proposals.

Question 18

If you identified there could be negative impacts of the Climate Change Plan, are there any ways you think we could reduce that negative impact and if so, what would you recommend?

Additional reporting and regulatory burdens on local authorities must be fully supported and resourced, or risk placing additional pressure on local authority finances. Unintended negative impacts would therefore be pressures on other local authority services.

Other negative impacts may be that, without the required powers and resources for delivery, the proposals in the Plan will not be effective at meeting carbon budgets and we will see further climate breakdown alongside higher costs of mitigation at a later date.

Question 19

Please share any other quantitative data, or sources of this, to assist in developing the impact assessments:

Question 20

Are there any previous examples or case studies we should consider when assessing potential impacts?

Question 21

The Plan's plan for future-proof jobs and infrastructure could be more robust. There is a risk that sweeping changes to heating systems & vehicles will be legislated without sufficient support in place. There are no targets for job creation or estimations of how many workers will have to up-skill or re-skill per annum or a cost associated, only commitments to work with colleges.

Infrastructure, particularly in rural settings, must include skilled mechanics and certified heat pump installers. As written, the proposals in the Plan rely on commercial delivery and policies that are viable in well-connected areas, but the Plan should also make rural and deprived areas stakeholders and a key part of the transition.

Can you think of any further positive or negative impacts, that are not covered in the impact assessments, that may result from the Climate Change Plan?

Section 4: Strategic Environmental Assessment (SEA)

The following questions concern the SEA. There is a legal requirement to consult on the SEA Environmental Report (Environmental Assessment (Scotland) Act 2005). The purpose of the SEA is to assess the likely environmental effects of government policy, considers how negative impacts can be avoided or minimised and ways that positive effects can be enhanced.

Question 22

What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? Are you aware of further information that could be used to inform the assessment findings?

Question 23

What in your view are the most significant environmental effects which should be taken into account as the Draft Climate Change Plan is finalised?

Question 24

What are your views on the predicted environmental effects as set out in the environmental report? Please share any other useful sources.

Question 25

What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

Section 5: Monitoring emissions reductions

The following questions concern the reporting of annual emissions reductions.

Question 26

What are your views on the proposed approach to reporting annual emissions output and how this could support public understanding of Scotland's progress towards achieving our Carbon Budgets?

No pressing concerns, although reports should be in plain English and receive adequate scrutiny.

Question 27

How useful do you think reporting emissions statistics at a more detailed level (including at the sub-sectoral level), would be in helping people understand key sources of emissions, and our progress in reducing them?

It will be useful for practitioners and environmental professionals. These detailed reports will be more useful if the Plan is able to clarify the sectors and sub-sectors that are the responsibilities of local authorities or other specific public bodies so that public bodies can plan emissions reductions in more meaningfully than the 'emissions within the influence of local authorities' DESNZ category.

Question 28

How might the use of timely indicators, as proposed, help people to understand what needs to be delivered to achieve our Carbon budgets, and to understand whether progress is on track?

The idea of using indicators rather than abstract numbers is welcome, as it is generally more comprehensible than tonnage of emissions, which are abstract. This is the approach that local authorities are encouraged to take using the ClimateView software, but we are still expected to link these indicators to specific emissions reductions.

The indicators should be plain English and comprehensible, but the data behind them should be tied to suitable emissions levels. For instance, setting a national target for heat network connections by a target date which would result in suitable levels of emissions. This way, the indicator '# of homes connected to a heat network' compared to the target would be trackable, comprehensible, and available earlier than the emissions monitoring on a lag.

Section 6: Monitoring Just Transition

The following questions concern the following 14 proposed indicators for monitoring and evaluation of the Climate Change Plan.

1. Participation in decision making
2. Community energy
3. Community benefits
4. Changes to places
5. Fuel poverty
6. Transport affordability

7. Socio-economic impact on oil and gas communities
8. Impact on household finances in oil and gas communities
9. Access to training for offshore oil and gas workers
10. Green jobs
11. Impact of energy prices on small businesses
12. Air pollution
13. Woodland creation
14. Peatland restoration

Question 29

The woodland creation indicator does not adequately capture the need to improve urban tree cover and green networks, which can be hugely beneficial for air quality and adaptation.

Transport affordability is a good indicator, but transport accessibility is also critical. For many communities in East Lothian, the barrier to sustainable transport is not that they cannot afford the bus. Rather the issue is that a bus does not come often enough or it does not take them to their destination in a timely fashion.

Fuel poverty is also an important indicator, but people could still live in a cold home and not meet the definition of fuel poverty. Once the new EPC framework is finalised, it will be worth re-assessing this indicator to align with the new measurements.

Please detail any specific changes that would improve any of the 14 proposed indicators, including any data sources not currently included within this framework that could provide a useful indicator of progress towards a just transition in Scotland on an annual basis.

Question 30

What are the most appropriate indicators for judging whether we are achieving meaningful public participation in decisions related to the climate? This includes both the quality of the participatory process itself, and the impact of that participation on the decision-making process.

Question 31

What indicator would provide the best measure of the impact of net zero development in local communities across Scotland? For example, the impact of the installation of renewable energy infrastructure or other land use changes (e.g. through peatland restoration or tree planting).

Question 32

Ensuring positive outcomes for workers who have transitioned from jobs within high-carbon industries is central to delivering a just transition. What specific data or indicators could we use to monitor the extent to which workers in high-carbon industries are securing alternative employment?

Question 33

What specific data or indicators could we use to meaningfully monitor the impact of the transition to net zero on the environment and biodiversity across Scotland on an annual basis?

Condition of habitats which are being used for carbon sequestration.
Climate indicators should include biodiversity indicators, and reported together so that local authorities can tackle the linked climate and nature emergencies. If local authorities are expected to monitor indicators, it should be supported with resources.