**Appendix A** **Proposed Consultation Question Responses**

Proposed responses have been provided for each of the following sections:

- **About You (8 Questions)**
- **Section 1: Delivering a Just Transition (Questions 1-4)**
- **Section 2: Sectoral contributions, policies and proposals (Questions 5-15)**
- **Section 3: Impact Assessments (Questions 16-21)**
- **Section 4: Strategic Environmental Assessment (SEA) (Questions 22-25)**
- **Section 5: Monitoring Emissions Reductions (Questions 26-28)**
- **Section 6: Monitoring Just Transition (Questions 29-33)**

## About You

**What is your name?**

*Neil Samson*

**Are you responding as an individual or an organisation?**

*Organisation*

**What is your organisation?**

*East Dunbartonshire Council*

**Further information about your organisation's response**

*The consultation response was shared with our Elected Members and Senior Leadership for information and comment ahead of submission.*

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

*Publish response with name*

**Do you consent to Scottish Government contacting you again in relation to this consultation exercise?**

Yes

**What is your email address?**

Neil.Samson@eastdunrton.gov.uk

**Where did you hear about this consultation?**

Scottish Government website.

**Section 1: Delivering a Just Transition (Questions 1-4)**

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

**Response:**

*We recognise the need for a just transition and agree that the overall CCP should be underpinned by statutory just transition principles. Ensuring a just transition nationally will require commitment and policy considerations in all sectors of the Scottish economy.*

*The just transition agenda is also reflected in East Dunbartonshire's Draft Climate Action Plan as its mission stems from the dual opportunity of climate action - to harness the well-documented economic benefits of the green transition while maintaining a tenacious commitment to advancing climate equity and a just transition.*

*The strong focus in sectors/regions of the country where large proportions of the workforce are in high-carbon sectors is positive. However, the just transition principles should be broadened from job losses in order to support improvements for the people and communities in Scotland in the transition to net zero. For example, given the disproportionate exposure of future generations and the world's poorest to the impacts of climate change, an accelerated transition would provide much more global and intergenerational justice.*

*The CCC's recognition of how fossil fuel dependence can increase exposure to financial crises also underscores how passing on the low-cost of renewably generated electricity to users is a core component of a just transition to net zero. While most levers to influence electricity prices are reserved, the Scottish Government should advocate changes necessary to incentivise decarbonisation.*

*In order to implement a just transition, communities need to feel empowered to participate and take action individually and as part of wider communities. These broader considerations for a just transition, set out within draft CCP Annex 1, clearly demonstrate the supporting context for this policy direction. This is underpinned by the Scottish Government Public Engagement Strategy for Climate Change[1], which focusses on public and community engagement in this sector.*

*In relation to the draft CCPs transport proposals from a Just Transition perspective, when setting the final vehicle mileage reduction target, the Scottish Government should consider the fact that owning a car is currently not affordable for many in Scotland. A future transport system that replaces the need to own a petrol or diesel car with an electric car is therefore not necessarily just. Creating the conditions to support greater active travel and integrated national and regional public transport ticketing could support a just transition through the poverty alleviation potential of making car free living more viable for those who require a car but are struggling with the increasing costs of maintaining it, insuring it, and running it. An alternative funding model that provides increased support to active travel and public transport would allow Councils and partners to support this aspect of a Just Transition while achieving the range of social and financial benefits that are referenced throughout the CCP.*

[1] Scottish Government (September 2021) Net Zero Nation: Public Engagement Strategy

*The draft CPP mentions changing Scotland's economy but could incorporate Community Wealth Building, which is a key component to changing an economy in a fair and just way. Community Wealth Building in terms of net zero investment could look to harness local wealth through pension fund investments in net zero infrastructure and enabling citizens to invest in the transition through the likes of community municipal investments. It would be beneficial if the CCP set out how this approach can be harnessed to ensure that the benefits of the transition are retained within local organisations in Scotland. Cumulatively, such schemes will have an important impact on addressing climate change as such grass-root approaches will help foster local ownership and place-based innovation in tackling the global climate crisis.*

*Having the just transition reflected through indicators within the monitoring and evaluation framework for the first time also confirms the Scottish Government's commitment to achieving a just transition rather than setting a high-level principle for the CCP. In addition, the Just Transition Commission's guidance and advice to continue to steer the Scottish Government approach is welcomed.*

**2. What skills, training and qualification provisions will be most important in a net zero future and what more could be done to support them?**

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.

**Response:**

*Decarbonisation has major job-creation potential and will require an increase in the supply of skills in areas including the installation and maintenance of zero emission heating systems, energy efficiency measures, installations of electric vehicle charging points, increasing renewable energy generation, skills to expand the capacity of the electricity grid, and skills required to scale-up nature-based solutions. There will be opportunities for people from all walks of life whether in trades, engineering, up-skilling for skilled practitioners or opportunities for those with few or no academic qualifications.*

*For example, the Climate Change Committee's (CCC's) advisory group note that a successful transition to a net zero economy requires a sufficient supply of skilled green economy labour workers and estimate between 135,000 and 725,000 new green jobs could be created by 2030 in the UK in sectors such as buildings retrofit, renewable energy generation and electric vehicle manufacturing.*

*The CCP could also provide details on how the Scottish Government's Climate Emergency Skills Action Plan and Implementation Plan and Future Skills Action Plan will help to deliver against the CCC's projected skills requirements for the transition to net zero. This includes capturing key points from the CCC, including the transition towards sustainable agriculture that the CCC emphasises: "The Scottish Government will need to support farmers and rural communities to diversify their incomes away from livestock farming and towards woodland creation, peatland restoration, agroforestry, and renewable energy."*

*There is useful data cited within the CCP on increasing green jobs created in Scotland, including Energy and Climate Intelligence Unit and the PwC Green Jobs Barometer – this could be built on by comparing the pace of change in these areas to the CCC's projected skills requirements, particularly with a focus on the sectors identified in the Scottish Government's Green Industrial Strategy.*

*There are risks for existing high-carbon sectors which mean that developing actions for green skills will become even more important to support the transition. For example, from a fossil fuel heating system engineer to heat pump installer this requires significantly different skills, including knowledge in heat loss calculations, hydraulic balancing, flow temperature calculations and heating system scale for the building/infrastructure being considered.*

*We welcome the piloting of the new Heat Pump Skills Fund, launched earlier in 2025, to upskill existing heating and plumbing businesses in heat pump installation. The Fund is focused particularly on delivering training to remote and rural areas via a mobile training van and will help test which skills installers have the greatest need for, therefore enabling the Fund to be further developed in line with increasing consumer demand for clean heat systems.*

*We therefore see it as fundamental to encourage growth of local skills/qualifications and a transition to green skills. The Fund (above) along with others focussing on all related green industries should be rolled out nationally to further support the transition. Therefore, facilitating early green skills transition, upskilling and reskilling is imperative to ensuring the current and new workforce has the capacity to facilitate this transition, while ensuring their long-term job security.*

*Potential skills shortages are anticipated in repairing and maintaining EVs and potentially electricians for charging infrastructure given the significant increase in grid capacity required to decarbonise heat and transport. The Plan should use CCC reports to estimate modal shift required to meet Scotland's net zero targets and use this information to derive projected skills demand.*

*Furthermore, Scottish Government policies can support collaborations with the private sector. Potential benefits could include green mortgages and securing low-interest loans and investments for clean heat infrastructure projects and retrofits.*

*Further information is available in the sources below:*

- *Scottish Government (2020) climate-emergency-skills-action-plan-2020-2025.pdf*
- *Scottish Government (2019) Scotland's Future Skills Action Plan*
- *Climate Change Committee (2023) A Net Zero workforce - CCC*

**3. 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?**

The Plan will bring opportunities and challenges for businesses and employers.

**Response:**

*Explore ways and advocate for the low cost of renewable generated electricity to be passed on to users (encompassing private, public and third sector employers)*

*The most fundamental way to accelerate the electrification of heating and transport, which are core aspects of employers reaching net zero, is passing on the low cost of renewably generated electricity to users. The high cost of electricity relative to gas is particularly pronounced in the UK where electricity prices became more expensive than in any EU country in 2024. Paradoxically, renewable energy is a significantly cheaper means of generating electricity than fossil fuels, however, these savings are not passed on to consumers due to a variety of artificial costs including carbon taxes, coupled electricity and gas rates and policy costs.*

*As the CCC note:*

*"In many key areas, the best way forward is now clear. Electrification and low-carbon electricity supply make up the largest share of emissions reductions in our pathway, 60% by 2040. Once the market has locked into a decarbonisation solution, it needs to be delivered. The roll-out rates required for the uptake of electric vehicles (EVs), heat pumps, and renewables are similar to those previously achieved for mass-market roll-outs of mobile phones, refrigerators, and internet connections".*

*Strategic Alignment*

*A presumption against high carbon investment that would jeopardise Scotland's carbon budgets has to be established and enforced if the trajectories identified by the CCC are to be delivered upon, which will support private, public and third sector organisations. Governance mechanisms to independently scrutinise the Scottish Government's use of spend being compatible with its statutory targets will be required. Moreover, stronger joint governance arrangements with local government are needed to ensure that climate actions are adequately funded and co-ordinated at the local level, which builds on the Climate Delivery Framework.*

*Targets for each of the key ministerial portfolios based upon the CCC targets including buildings, transport and nature-based solutions, will also be required.*

*Polluter Pays Principle*

*In line with the polluter pays principle, as outlined in the Just Transition for Transport and the CCC Scotland Carbon Budget advice report, entities and organisations responsible for significant levels of GHG emissions should fund the required measures to meet the emissions reductions targets. This includes moving the tax burden from renewables to fossil fuels to accelerate and incentivise electrification.*

*Renewable energy investment can deliver large financial returns, since local authorities are faced with significant financial pressures, including disproportionate exposure to inflationary pressures, increased demand for key services and increasing statutory responsibilities, there simply is not an option to invest in cost-saving ideas like this in the current financial climate from local authority budgets. Current global financial volatility may compound these financial challenges and further underscore the need for additional support to be provided to public bodies for green spend to save opportunities.*

*Funding and support for regional City Deal partnerships to develop Regional Energy Masterplans to accelerate local renewable investment by leveraging additional private investment*

*Additional support for employers to make the changes needed and seize the benefits of net zero would include the funding and development of City Deal partnerships, which are uniquely well-equipped to establish collaborative partnerships (private, public and third sector) to identify renewable energy potential based upon geographical and geological potential across their boundaries and to leverage private investment to support the development of such initiatives.*

*Public Sector Funding*

*Multi-year funding mechanisms for public sector to decarbonise, retrofit buildings and increase renewable energy outputs could support accelerated delivery of these initiatives.*

*Scottish Government could pioneer an evergreen investment fund which fronts the cost of these by Councils, with the fund being topped up by the savings, which could be reinvested in other green spend to save ideas. This could range from energy efficiency and renewable energy to fuel efficient driving training and smart meters. This could look to scale-up the success of the recent solar farms in North Ayrshire. Green for go – Solar PV farm is a first for Scotland.*

*This response should be read in conjunction with Question 2 relating to the skills and qualifications transition, across private, public and third sector organisations, required to support the Draft CCP and overall net zero targets.*

**4. What are your views on our approach to supporting places where the transition presents particular regional impacts?**

Our approach recognises that some of the Plan's impacts will have greater implications for particular regions of Scotland.

**Response:**

*We broadly agree with the approach being taken through the CCP, whereby efforts will be concentrated in areas/regions of the country where the just transition impacts will have greater implications. However, the just transition principles should also be implemented more widely and sector-specific to ensure that cost savings measures, efficiencies and policy changes result in real changes for the people and communities in Scotland. For example:*

- *passing on the low-cost of renewably generated electricity to users is a core component of a just transition to net zero and while these prices are reserved issues, the Scottish Government should advocate changes necessary to incentivise decarbonisation.*
- *there are significant skills gaps at present to deliver the heat in buildings transition. Not all homes requiring the necessary technological upgrades are in the same geographic areas as those losing fossil fuel industries. Green skills investment should be prioritised in this area in order for the Scottish Government to achieve the required targets being sought.*

**Section 2: Sectoral contributions, policies and proposals (Questions 5-15)**

**5. Buildings (Residential and Public): How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?**

**Response:**

*The proposed measures set out below will help Scotland work towards its net zero targets and also align with the CCC priority actions for 2025[2], including:*

- *Making electricity cheaper.*
- *Provide confidence and certainty to scale up heat pump deployment in existing buildings.*
- *Introduction of a comprehensive programme to decarbonise public buildings.*

*As highlighted by the CCC and within the draft CCP, the most fundamental barrier to decarbonise heating, which is a core aspect of reaching net zero, is the high cost of electricity relative to gas which is particularly pronounced in the UK. Working with the UK Government to rebalance the cost of gas and electricity is crucial to ensure homes can be decarbonised in a fair manner that over time reduces bills for homeowners and tenants.*

*Energy Efficiency Measures including Minimum Standards*

*Improving energy efficiency standards is paramount to addressing fuel poverty, reducing emissions from buildings and reducing demands on the electricity grid to support broader decarbonisation.*

*As noted in the Draft Proposals for Minimum Energy Efficiency Standard Regulations (MEES) for the Domestic Private Rented Sector PRS), the Private Rented Sector has some of the highest rates of fuel poverty in the country. Since improved insulation and other energy efficiency measures is estimated to reduce emissions by 5% while also improving housing quality, reducing energy costs for tenants and facilitating the transition to clean heating systems, the introduction of these measures would help to alleviate fuel poverty in East Dunbartonshire and across Scotland while also reducing contributions to climate change.*

*Scottish Government figures note that the PRS in Scotland is made up of around 300,000 homes with approximately 44% of people in privately rented homes living in fuel poverty. Around 48% of PRS properties are at EPC band D or below, and the sector has the highest percentage of EPC band E, F or G rated properties across tenures at 14%, compared to 5% in the social rented sector and 11% in the owner-occupied sector.*

*Warm homes resulting from energy efficiency improvements also improve health outcomes, especially for more vulnerable groups such as elderly, young children and communities with disabilities or health risks that can be exacerbated by damp, cold homes. Implementing MEES also support reducing energy costs for tenants.*

*Policies such as MEES for private landlords, MEES with accompanying financial support for public bodies and registered social landlords, and policies to incentivise and support businesses in achieving improved energy efficiency measures would drive emissions reductions in buildings while supporting fuel poverty reduction and reduced pressure on the electricity grid.*

[2] Climate Change Committee (June 2025) Progress in Reducing Emissions - 2025 Report to Parliament

*Ensuring the minimum standards are based on the reformed EPC rating and setting statutory dates to phase out the purchase of new direct emitting heating systems will also be key. The extension of MEES to cover industrial activities, should also be explored.*

*While some of the costs of MEES are anticipated to come from private landlords, costs to Scottish Government will include provision of sufficient resource for Councils to undertake the additional enforcement duty and providing low interest loans to support landlords. Commitment for multi-year funding for area-based schemes from the Scottish Government would also support local authorities with longer term procurement and contractual awards and improved performance in delivering energy efficiency outcomes.*

*Funding incentives for insulation upgrades and adoption of solar PV, particularly for lower earning owner-occupiers, those living in fuel poverty and small and medium enterprises, will also be crucial.*

*<u>Policies to Accelerate Electrification of Heat</u>*

*Passing on the low costs of renewably generated electricity to consumers is crucial to promoting uptake of clean heating technologies and participation in heat networks.*

*Heat pumps are much more efficient than gas boilers, they operate at scale in climates much colder and more variable than Scotland's, and they reduce our dependence on a finite resource that is making the climate more hostile. Creating financial incentives to accelerate heat pumps' adoption is essential to deliver on the CCC's target of 40% of homes using low-carbon heating in Scotland by 2035, and this should be a priority. Facilitating a green skills transition to support this transition is also key. However, in the absence of progress in addressing artificial price mechanisms that keep electricity costs high for users, significant grants and subsidies will be essential to achieving the transition to zero emissions heating systems required to deliver on Scottish Government net zero targets.*

*Various scales of heat networks can also support the transition to zero direct emission heating and continuing the funding for feasibility work in this area is important. Supporting flexible tariffs, and setting clear customer protection and zoning regulations for heat networks will also play a crucial role in encouraging participation.*

*A national database which provides case studies of energy efficiency and zero emission heating installation on the most common building archetypes across Scotland would be particularly valuable. This could be accompanied by policies that accelerate communities' and the Climate Hub's access to information on clean heating systems, solar panels and energy efficiencies. Including case studies, myth busters and information on the wider benefits would help to overcome barriers to their adoption.*

*Furthermore, installation of clean heating systems can be paired with on-site renewable energy generation and battery energy storage systems to allow tenants / building occupiers to benefit from any available flexible tariffs and zero-bills schemes, while reducing demand on the electricity grid and making properties more resilient and energy independent. The introduction of these measures would therefore help achieving dual targets of alleviating fuel poverty and reducing contributions to climate change.*

*Whole Life Emissions and Embodied Carbon*

*The construction industry accounts for approximately 62% of total waste generated in the UK, primarily driven by demolitions and excavations. According to the Chartered Institute of Building, new buildings tend to create a greater carbon impact than reusing or repurposing existing buildings. However, demolitions are frequently still prioritised over retrofits due to various pressures and perceptions on building efficiency, demand for more facilities like social housing, and limited funding for refurbishments.*

*Policies should prioritise refurbishment and repurposing ("retrofit first" approach) over demolition and new constructions. For example, policies could focus on working with the private sector to support the introduction of green mortgages and low-interest loans and investments for clean heat infrastructure projects and retrofits. Whole life carbon emissions, comprising of operational carbon (emissions during building use) and embodied carbon (emissions during building construction, maintenance and end of life stages) must be central to the CCP's approach to building decarbonisation. Wider regulations covering embodied carbon could incentivise improvements to planning construction projects and managing estates to ensure long-term sustainability in the construction sector.*

*Public Sector Leadership of Decarbonising Buildings*

*We agree with the principle for public authorities to be leading by example and ensure all publicly owned buildings are heated through clean heating systems. However, given the scale of the task both financially and in terms of staff time, adequate support must be provided. This is illustrated by the fact that East Dunbartonshire Council has an estimated funding gap of £314 - £326m by 2045 to achieve corporate emissions net zero targets, a significant proportion of which comes from decarbonising buildings.*

*Further information is available in the sources below:*


- *World Economic Forum (2021) How can we reduce the construction industry's carbon footprint?*
- *Nesta (2024) For the first time, UK household electricity prices rose to levels higher than those in any EU country*
- *International Energy Agency (2024) Rapid rollout of clean technologies makes energy cheaper, not more costly - News - IEA*
- *Nesta (2023) The electricity-to-gas price ratio explained*
- *Institution of Civil Engineers (2023) PAS 2080: Carbon management in buildings and infrastructure guidance | Institution of Civil Engineers (ICE)*
- *The Chartered Institute of Building (2014) CIOB-research-The-Real-Face-of-Construction.pdf*
- *Scottish Government (2023) Scottish House Condition Survey: 2023 Key Findings*
- *Scottish Government (2025) Draft Energy Efficiency (Domestic Private Rented Property) (Scotland) Regulations: consultation - gov.scot*

**6. Buildings (Residential and Public): How can clean heating systems (such as heat pumps) be made more affordable for everyone?**

**Response:**

Response to be read in conjunction with question 5.

*Heat pumps are significantly more efficient than gas boilers, have been proven to operate at scale in climates much colder and more variable than Scotland's and they improve energy independence. However, there are significant circumstantial barriers to transitioning to heat pumps including:*

- *Upfront Costs: the significant initial investment for purchasing and installing a heat pump system. This is a particular issue for Scotland given that over 80% of buildings are heated by gas and retrofitting heat pump systems can be costly.*
- *Operating costs: despite heat pumps being highly efficient, the current imbalance in energy taxes and levies often makes electricity disproportionately more expensive than gas, which undermine the consumer case for switching technologies.*

*Ensuring the low-cost of renewably generated electricity is passed on to users is critical to creating financial incentives to move away from gas boilers to more efficient zero-emission heating systems such as heat pumps.*

*While the technology exists to achieve net zero in buildings, bold decisions to facilitate the transition including energy price reforms by the UK Government, and MEES, incentivising retrofits to reduce embodied carbon, statutory phase-out dates for direct fossil fuel emitting systems based on the CCC's projections, supported by the provision of grants and subsidies for heat pumps, renewable energy and energy efficiency measures. For example, the continued and expanded Scottish Government grant and loan schemes[3] for energy efficiency improvements, and heat pump purchase and installations.*

*While wood burning stoves tend not to be high greenhouse gas emitting systems, the health impact of particulate matter emissions from these heating systems and the consequent societal costs such as additional financial pressure on the NHS, create a financial and social case for restricting their use, especially in built up areas and in properties in close proximity to sensitive receptors.*

*Decarbonisation of buildings has major job-creation potential and will require an increase in the supply of skills including for the installation and maintenance of zero emission heating systems, energy efficiency measures and solar PV installation which will also be crucial to meet the targets set out by the CCC, and by extension Scottish Government's net zero targets.*

*Furthermore, Scottish Government policies can support collaborations with the private sector. Potential benefits could include green mortgages and securing low-interest loans and investments for clean heat infrastructure projects and retrofits.*

[3] Home Energy Scotland Grant and Loan Scheme

*Further information is available in the sources below:*

- *Scottish Government (2020) climate-emergency-skills-action-plan-2020-2025.pdf*
- *Scottish Government (2019) Scotland's Future Skills Action Plan*
- *Climate Change Committee (2023) A Net Zero workforce - CCC*

**7. Transport: 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.

**Response:**

| Rank | Choices |
|---|---|
| **1** | Other (text below) |
| **2** | Cost of new zero emissions vehicles needs to come down |
| **3** | Reliable infrastructure for vehicles (such as fuel or charging networks) |
| **4** | Access to funding support / low cost finance |
| **5** | Noticeably cheaper running costs (including electricity, maintenance and insurance) |
| **6** | Ensuring an adequate number of trained mechanics available to perform essential maintenance and repairs |
| **7** | Convenient access to public charging infrastructure |
| **8** | Cost of used zero emissions vehicles needs to come down |
| | Other:<br>*Additional resource to install electric vehicle infrastructure, expansion in grid capacity and replacing the fossil fuel powered vehicles in the Council's fleet is essential. This is particularly important for large vehicles, as large ultra-low emission vehicles are currently much more expensive than internal combustion engine vehicles.*<br><br>*Passing on the lower costs of renewably generated electricity to users is also important to bolster the financial case for accelerating fleet decarbonisation.*<br><br>*Additional points:*<br>*Significant costs associated with the EVs (particularly larger fleet vehicles and HGVs) are well known but the associated insurance premiums is also a key consideration for Local Authorities.*<br><br>*Within the context of the forthcoming UK-wide charges for EV road users in the form of a new 'pay-per-mile' tax (Electric Vehicle Excise Duty (eVED)) which will start in April 2028, charging 3p per mile for pure EVs and 1.5p for plug-in hybrids (PHEVs).* This is now an additional charge which will have to be accounted for when taking the decision to transition Local Authority fleet. This measure could reduce incentives for the shift to electric vehicles especially where large mileage is expected (e.g. managing a waste service). |

| | |
|---|---|
| | *Outwith the Council's own fleet, as noted in responses to other questions, the priority should be ensuring that the proportion of transport funding reflects the sustainable transport hierarchy and CCC modal shift trajectories to support East Dunbartonshire's area-wide net zero target.* |

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

**Response:**

The development of place-based delivery plans for sustainable infrastructure at a national, regional and local level is a collaborative method to provide opportunities to encourage participation in the planning and delivery of such required infrastructure improvements. Engagement with key sector stakeholders as well as communities will be an essential part of the planning process. Engagement should be undertaken at concept, design, implementation and post-delivery evaluation stages to reflect lived-experience and encourage buy-in to proposals. Adopting co-design approaches and clearly demonstrating how community input shapes decisions will build trust and incentivise community participation in planning and ultimately to use sustainable infrastructure.

Additional resourcing should be provided from the Scottish Government to enable these place-based measures to be adequately delivered and ensure Local Authorities can realise the full intended benefits. This could take the form of specific funding to support communities to develop Local Place Plans, which could help shape development and sustainable infrastructure considerations for local areas. Followed by multi-year delivery funding for local sustainable infrastructure would support engagement, reduce delays, and disillusionment in the local community due to changes in the funding landscape. This would give communities more certainty that plans for their local areas will be delivered upon in a timely manner.

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

**Response:**

There are numerous welcome initiatives to support a more climate friendly lifestyle related to transport cited in the CCP, including providing free bus travel for under 22s, older and disabled persons, the significant increase in active travel funding as a proportion of the transport budget at periods in the parliamentary term, and the focus in the CCP on supporting electrification of transport. The Scottish Government re-iterated its commitment to phasing out new diesel and petrol cars by 2030 and establishing consumer incentives to encourage EV uptake in all sectors and policies to promote public transport.

Areas that could build on these initiatives in supporting people to have a more climate-friendly lifestyle, include:

*Increase the proportion of the transport budget allocated to active travel and sustainable travel to reflect the CCC's modal shift requirements*

*While the draft CCP reiterates the Scottish Government's commitment to promote active travel and greater use of public transport in addition to wider social and financial benefits of modal shift, the CCP could contain more details of how it aligns with the CCC recommendations to "improve Scotland's public transport services and active travel infrastructure through strategic investment in integrated networks, enhanced services, and dedicated walking and cycling routes, supported by long-term funding and powers for local councils."*

*Policies to achieve modal shift up the sustainable transport hierarchy are a key factor to reach net zero in the CCC's carbon budgets and is key for individuals to be supported to live a more climate-friendly lifestyle.*

*More specifically, making car-free living more viable through increased funding for proven solutions to overcome safety concerns, such as new high-quality, segregated, lit, and maintained active travel infrastructure, should be a core pillar of policy considerations. The estimated financial saving that this could deliver for the NHS, the poverty alleviation potential of making car-free living more viable, improved air quality and additional co-benefits underscore the high social return on investment in active travel which should be factored in. This would therefore make greater contributions to sustainable development as a core part of the Scottish Government's draft Statutory Guidance for the Climate Change (Scotland) Act 2009.*[4]

*Further action to significantly improve and expand public transport (offer and use) would be necessary in supporting a more sustainable lifestyle. Allocated funding to make public transport in Scotland more reliable, affordable and accessible to all, would make low-carbon travel more convenient for people who usually rely on cars. Measures such as the free bus travel for under-22s should be expanded to incentivise more public and active travel. For example, the qualifying categories for free public transport could be expanded to include parents and carers, which would lead to reduce car numbers and congestions and improve local air quality.*

*The implementation of sustainable and liveable places policies through the National Planning Framework 4 also has a core role in modal shift to ensure that new developments have access to sustainable and active travel options and core amenities so that car dependence is not instilled in new developments.*

*Policies supporting modal shift should also be seen as means to reduce pressure on the electricity grid given the projected pace of electrification of transport, electrification of heating, and increasing electricity demand from data centres and AI.*

*Entrench the CCC targets in the core part of the CCP*

*The CCP sets draft actions and targets for this sector (within Annex 2), including:*

- *A draft target has been set to reduce emissions from cars in the first carbon budget (2026-2030) by at least 16% from today's levels (2023). Consistent with the CCC advice, we will need to reduce annual car mileage by at least 4% by 2030 (on a 2030 'business as usual' forecast baseline) and at least 90% of all new car sales will need to be electric by the same year.*

[4] Transport Scotland (2025) Benefits of Active Travel

- *Multi-year funding commitments to enable build-up of capacity and capability in the active and sustainable sector and confidence for planning and delivery of long-term, large-scale ambitious infrastructure programmes.*
- *Progress development of smart and digital national integrated fares, ticketing and payment systems and technology across public transport in Scotland.*

*This level of detail should be brought forward into the main text of the Draft CPP as smart targets as it provides useful context and a pathway to achieve the high-level proposals and would raise the profile of the additional measures being taken. This approach should also be adopted for the other sector specific policies, proposals and targets throughout the CCP. The draft targets are based on the advice from the CCC on what is possible with only incentivisation measures for switching to sustainable transport modes.*

*Promotion of policies required to create financial incentives for EV adoption.*

*Electrification is a core part of transport's transition to net zero. Renewably generated electricity is cheaper than fossil fuels, but these lower prices are not passed on to users due to a range of artificial cost barriers. The artificially high price of electricity continues to slow the pace of decarbonisation of transport. Passing on the low-cost of renewably generated electricity to users is therefore a core component of a just transition to net zero and while these prices are reserved issues, the Scottish Government should advocate changes necessary to incentivise decarbonisation. Particularly within the context of the forthcoming UK-wide charges for EV road users in the form of a new 'pay-per-mile' tax (Electric Vehicle Excise Duty (eVED)) which will start in April 2028, charging 3p per mile for pure EVs and 1.5p for plug-in hybrids (PHEVs). The intention is that this will replace lost fuel duty revenue as more drivers switch to electric vehicles and will require annual mileage reporting through MOTs.*

*Continued extension of electric vehicle infrastructure*

*While EVs can be much cheaper to run for those who can charge them at home, this is not an option for many households. The Council cannot allow residents to trail cables across the footway due to the fact that it is a trip hazard or to reserve space on public roads for private vehicle charging due to the need for this space to be available for maintenance of infrastructure and the fact that it takes up public road space. Proposed solutions to making home charging more widely accessible should feature in the CCP, such as trials of slit trenches for cables, to support EV adoption while not creating barriers for active travel.*

*Policies to halt the increasing average size of vehicles*

*The increase in the average size of cars in recent decades compounds issues of limited space on roads for active travel and puts a higher cost on public bodies for the maintenance of public infrastructure. It also exacerbate safety issue for active travel.*

*The CCP should explore ways to halt the significant increase in the average size of cars in recent decades and the fact that larger vehicles are more dangerous - particularly for vulnerable people such as children, pedestrians and cyclists - while having a higher social cost on public infrastructure and taking up limited space, especially in towns and cities. Exploring policy mechanisms to halt the growth of average car size will be important for reducing costs for infrastructure maintenance and could help to alleviate the increasing financial burdens on local authorities.*

*Policies to reduce emissions from frequent fliers, excluding islands where there are limited transport options.*

*Despite the emission intensity of flying, the CCC recognises that there is unlikely to be a low-carbon option for flights operating on a significant scale by 2045. Most flights are for leisure and these emission intensive activities are skewed disproportionately to higher earners. Analysis suggests that air travel is highly unequal in the UK and driven by richer, highly educated and urban households. Flights also contribute disproportionately to climate change by virtue of emissions being released into the upper part of the atmosphere. A frequent flier levy, which excludes islands with limited other transport options, would be conducive to a just pathway to net zero and should be a core policy consideration in line with the wording from the Scottish Government consultation on the Just Transition Plan for Transport "Those who are better off are responsible for a greater proportion of transport emissions, and this needs to be reflected in our approach to meeting the costs of the transition."*

*See sources below for further details:*

- *CCC (2025) The Seventh Carbon Budget - Climate Change Committee*
- *The Institute For Public Policy Research (2025) Revealed: Car ownership eats up a quarter of poorest households' incomes | IPPR*
- *Living Streets (2024) The Pedestrian Pound makes the economic case for investing in better streets for walking and wheeling*
- *Transport for London Walking and cycling: the economic benefits (tfl.gov.uk)*
- *The Scottish Government (2014) A More Active Scotland: Building a Legacy from the Commonwealth Games*
- *Sustrans (2024) Walking and Cycling Index 2023: Scotland (walkwheelcycletrust.org.uk)*
- *Sustrans (2023) Why are cars getting bigger? A deep dive into how UK regulations are enabling car size growth*
- *Scottish Government (2023) National Planning Framework 4 - gov.scot*
- *Scottish Government (2025) Just Transition: draft plan for transport in Scotland - gov.scot*
- *Transport Scotland (2023) Transport Scotland's Approach to Climate Change Adaptation and Resilience - gov.scot*
- *Transport Scotland (2020) National Transport Strategy 2 - gov.scot*
- *Travel Behaviour and Society (2021) Trends in air travel inequality in the UK: From the few to the many? - ScienceDirect*

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

The areas are:

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

**Response:**

Policy to prioritise the overall reduction of waste – such as further limits on single use plastics and charges on plastics for supermarkets.

*There should be a focus on implementing policies that prioritise the overall reduction of waste. Ideas could include further limits on single use plastics, including bags, as well as further charges on plastic use and packaging for products and supermarkets.*

*In the 7th carbon budget, the CCC states that "Waste reduction is enabled by improving resource efficiency, reducing food waste and increasing recycling rates." The CCC has several recommendations and assumptions for the Scottish Government to reduce overall waste levels to achieve a balanced pathway (below). We recommend that these should be fully acknowledged and integrated into the CCP.*

- *Combined recycling rates for household and commercial and industrial waste, including non-household municipal waste, will need to reach 68% by 2035, an increase from 47% in 2025.*
- *Ensure actions outlined in the circular economy and waste route map are delivered on time and build on previous waste reduction targets.*
- *The need for a 39% reduction in total food waste per capita by 2030 compared to 2021 levels, which is aligned to the Courtauld Commitment 2030 and the UN's Sustainable Development Goal (SDG) 12.3, which Scotland has committed to.*
- *The near elimination of biodegradable waste to landfill by 2028 across the UK. Even though Scotland intends to ban biodegradable waste from going to landfill starting at the end of 2025, this only covers municipal waste. The CCC recommends that both household, commercial and industrial waste should be included in this.*

*Further information is available in the source below:*

- *Climate Change Committee (2025) Scotland's Carbon Budgets - Climate Change Committee*
- *Scottish Government (2024) Scotland's circular economy and waste route map to 2030 - gov.scot*
- *Climate Change Committee (2025) The Seventh Carbon Budget - CCC*

Policy to improve circularity in the economy

*Zero Waste Scotland estimates that approximately 80% of Scotland's carbon footprint comes from our consumption of goods, materials and services. In addition, in Scotland, only 1.3% of resources are reused, compared to 8.6% globally and 24.5% in the Netherlands, the world leader in terms of circularity.*

*Policies should work to improve circularity within areas such as product development, food production and construction. Improving circularity requires robust application of the waste hierarchy to prioritise waste prevention and reuse over recycling, late-stage recovery, and disposal. Preventing waste from the outset of product design itself is key to reducing total consumption and waste emissions. This approach creates long-term cost savings, supporting the development of resilient supply chains that centre sustainability and empowering communities to consume responsibly and repair existing goods and products.*

*If Scotland can improve the circularity of the economy, not only will there be a reduction in the overall GHG emission from waste, but there will also be an increase in 'resource security' since less raw materials and environmental disruption would be needed for new product development. Additional potential co-benefits are as follows:*

- *Reduction in materials going to landfill.*
- *Reduction of landscape and habitat disruption from raw material extraction.*
- *Reduced costs for buying raw materials and creating new products, these savings could be passed on to the customer purchasing the product.*[12]

*Further information is available in the source below:*

- *Zero Waste Scotland (2021) Everything we buy has a carbon cost | Zero Waste Scotland*

Policy to improve circularity in development and construction sectors

*Circularity principles are also key to construction and sustainable development. The construction industry accounts for approximately 62% of total waste generated in the UK, primarily driven by demolitions and excavations. According to the Chartered Institute of Building, new buildings tend to create a greater carbon impact than reusing or repurposing existing buildings. However, demolitions are frequently still prioritised over retrofits due to various pressures and perceptions on building efficiency, demand for more facilities like social housing, and limited funding for refurbishments. Policies should focus on improving circularity with construction and development.*

*Scotland's Zero Waste plan currently mandates developers to submit a Site Waste Management Plan. These requirements can be further strengthened by setting local PAS 2080 standards, circular economy statements and pre-demolition audits to set developer responsibilities to properly manage environmental impacts and embodied carbon throughout a building's life cycle. Enacting these standards can support a foundational transformation within the construction industry to plan for the entire life cycle of buildings, from material sourcing, transportation and assembly to usage, demolition and sustainable disposal.*

*As noted by the CCC, the key actions regarding CCS for the Scottish Government to deliver a balanced pathway in waste are as follows:*

- *"Ensure that new energy from waste capacity is only permitted where a viable route to connecting carbon capture and storage (CCS) can be established.*
- *Work with the UK Government, industry, and local authorities to bring forward plans for installing CCS at Scotland's EfW plants, including enabling development of the Scottish Cluster and assessing the feasibility of CCS at existing and future plants."*

*It is important to note that CCS is currently unproven at scale relevant to national emission reductions. Therefore, while it is worth exploring for residual emissions, it should not be used as a basis to justify future emission intensive developments or delays to decarbonisation through proven routes. Scottish Government should prioritise solutions that are proven at scale. Priorities for policies should follow the waste hierarchy to focus on waste prevention and reuse over recycling, late-stage recovery, and disposal.*

*Policies can be introduced, but businesses and construction companies will have to implement circularity into their practices. There could be a current skills gap in refurbishments or retrofits which will need to be addressed.*

*Further information is available in the source below:*

- *Institution of Civil Engineers (2023) PAS 2080: Carbon management in buildings and infrastructure guidance | Institution of Civil Engineers (ICE)*
- *CCC (2025) Scotland's Carbon Budgets - Climate Change Committee*
- *Scottish Government (2010) Scotland's Zero Waste Plan - gov.scot*
- *The Chartered Institute of Building (2014) CIOB-research-The-Real-Face-of-Construction.pdf*

Policy to prioritise the need for higher recycling rates.

*As noted by the CCC, the key actions needed for the Scottish Government to increase recycling rates to deliver a balanced pathway in waste are:*

- *For the Scottish Government to consider accelerating plans to introduce statutory recycling and reuse local performance targets, which are currently planned from 2030, to increase recycling and waste reduction efforts ahead of the elimination of biodegradable waste going to landfill.*
- *Increase household, commercial and industrial recycling rates to reach 68% by 2035.*

*Recycling rates for municipal waste in Wales reached 66.6% in 2023-24, making it the nation with the second highest recycling rate in the world at the time, just behind Austria. Given how close this level is to the CCC's projections for 2035, policies to emulate the recycling successes in Wales should be included in the CCP. Policies aimed at increasing recycling rates across all sectors, not only municipal waste could also be integrated into the Circular Economy Bill.*

*Further information is available in the sources below:*

- *Welsh Government (2024) Local authority municipal waste management: April 2023 to March 2024 (headline results) [HTML] | GOV.WALES*
- *BBC (2024) Environment: Wales second in the world for recycling rates - BBC News*

- *Scottish Government (2024) Circular Economy Bill passed - gov.scot*
- *CCC (2025) Scotland's Carbon Budgets - Climate Change Committee*
- *Zero Waste Scotland (2023) Circular economy business support | Zero Waste Scotland*
- *Scottish Government (2024) https://www.gov.scot/publications/environment-strategy-scotland-delivering-environment-strategy-outcome-scotlands-economy-evidence-base-policy-levers/documents/*
- *Circular economy: definition, importance and benefits | Topics | European Parliament*

**11. Energy Supply: What are your views on Scotland generating more electricity from renewable sources?**

**Response:**

Increasing Scotland's electricity from renewable sources is paramount to reducing emissions, creating new green jobs locked into the area, improving energy independence and reducing costs of electricity. Projected increase in data storage and energy intensive AI mean that there will be even greater demand for renewable energy generation in the future.

*The CCC's emphasis on electrification underscores how increasing renewable energy output is paramount to reaching net zero:*

*"In many key areas, the best way forward is now clear. Electrification and low-carbon electricity supply make up the largest share of emissions reductions in our pathway, 60% by 2040. Once the market has locked into a decarbonisation solution, it needs to be delivered. The roll-out rates required for the uptake of electric vehicles (EVs), heat pumps, and renewables are similar to those previously achieved for mass-market roll-outs of mobile phones, refrigerators, and internet connections."*

*Further considerations that will need to accompany increased renewable energy supply, include:*

Policies to support rapid acceleration of grid capacity including demand reduction measures

*While renewable energy has clear and compelling advantages over fossil fuels in terms of energy security, cost, long-term local job creation, and environmental outcomes, there is a risk that supporting infrastructure for grid extensions is not accelerated at the required pace set out in the CCC carbon budgets. This challenge is compounded by the fact that grid capacity will have to expand at pace to accommodate the increased demand for electrified transport and electrified heating systems coupled with future energy intensive developments from data centres and the increasing use of AI. Transparency on how the energy capacity modelling will take account of projected increases in data storage and energy intensive AI would also be a useful addition for the CCP.*

*Specific examples of demand reductions, including setting minimum energy efficiency standards to retain heat and reduce heating demand, rapid expansion of segregated active travel infrastructure and reliable, affordable bus and rail options to give people viable alternatives to individual car use and to ease pressure on the grid as the proportion of vehicles that are electrified increase.*

*Consequently, ways of reducing electricity demand while accelerating the transition to net zero - such as increased active travel infrastructure and public transport provision to reduce electricity demand from transport and more extensive energy efficiency measures to reduce electricity demand from buildings – should be cited as key infrastructure required to meet Scotland's energy needs and support exportation of renewably generated electricity.*

Funding and support for regional City Deal partnerships to develop Regional Energy Masterplans to accelerate local renewable investment by leveraging additional private investment

*City Deal partnerships are uniquely well-equipped to establish collaborative partnerships to identify renewable energy potential based upon geographical and geological potential across their boundaries and to leverage private investment to support the development of such initiatives. The National Energy Systems Operator (NESO) should also be required to collaborate with City Deal partnerships to ensure that Regional Energy Masterplans nest into Regional Energy Strategic Plans and Strategies.*

*Further information is available in the sources below:*

- *Nesta (2024) For the first time, UK household electricity prices rose to levels higher than those in any EU country*
- *International Energy Agency (2024) Rapid rollout of clean technologies makes energy cheaper, not more costly - News - IEA*
- *Nesta (2023) The electricity-to-gas price ratio explained*
- *Climate Change Committee (2025) Scotland's Carbon Budgets - Climate Change Committee*
- *Scottish Parliament (2023) Urgency needed to create capacity in Scotland's electricity infrastructure*

*Renewables have clear advantages in terms of cost, environmental factors, local jobs, energy independence and reducing the UK's exposure to financial crises. As the CCC notes:*

*"Net Zero will increase economic security against fossil fuel price shocks, which have caused around half of the UK's recessions since 1970. There are also opportunities for new jobs in areas such as heat pump installation, and growing markets such as green finance. Clean, efficient, electric technologies will mean reduced air pollution and should mean lower energy bills than continued reliance on fossil fuel technologies."*

*Passing on the low cost of renewably generated electricity to users would help to significantly reduce energy costs and alleviate fuel poverty in Scotland. Improved energy efficiency measures, as described Buildings section responses, would also contribute to these benefits.*

*Many policy levers for influencing the artificially high costs of electricity and passing on the low costs of renewables to users are reserved issues, so the Scottish Government's role may be limited to advocacy on this. However, reducing pressure on the grid by taking urgent action to expand grid capacity and setting long-term demand reduction measures, such as further efforts to increase modal shift and the introduction of MEES, are within Scottish Government's control and constitute strong opportunities to support electrification of heat and transport.*

*Further information is available in the sources below:*

- *Scottish Parliament (2023) Urgency needed to create capacity in Scotland's electricity infrastructure | Scottish Parliament Website*
- *CCC (2025) Scotland's Carbon Budgets - Climate Change Committee*

*In addition, it would be useful if the CCP included a commitment from Scottish Government to develop a solar routemap for Scotland, similar to the following - Solar Roadmap UK June 2025).*

**12. Business and Industrial Processes: What support do industries need to reduce their carbon emissions while remaining competitive?**

**Response:**

*As noted by the CCC with respect to Industrial electrification: "by 2035, the proportion of industrial energy supplied by electricity in our pathway doubles from levels in 2025, reaching around a third. This rises to 58% by 2045. Electric alternatives, such as electric steam crackers in the chemicals sector, replace most types of fossil fuel-fired industrial equipment. Electrifying industry allows manufacturers in Scotland to benefit from global demand for low-carbon goods."*

*While these policies are less directly applicable to East Dunbartonshire Council given the relatively low industrial emissions in the area, it is noteworthy that the increased demand for electricity to decarbonise transport, heating, industry and other areas, coupled with projected increases in energy demands for data storage and AI, underscores the need for policies that would significantly increase renewable energy generation, grid capacity and scale-up demand restriction measures such as energy efficiency and active travel infrastructure at pace. Other measures to reduce industry emissions, such as an effective cap-and-trade system and carbon taxation, and the extension of Minimum Energy Efficiency Standards to cover industrial activities, should also be included.*

*Further information is available in the source below:*

- *Climate Change Committee (2025) Scotland's Carbon Budgets - Climate Change Committee*

*The CCC priority recommendations for 2025 also account for this through accelerating electrification of industrial heat. The CCC recommended that the Industrial Strategy and supporting strategy for decarbonising clean energy industries should support a rapid transition towards electric heat, and that the UK Emissions Trading Scheme (ETS) should be linked to the EU market.*[5]

*As industry increasingly shifts to electrified production processes, creating sufficient grid capacity not only to meet existing industrial electrification demand but also adequate to attract and encourage new inward investment, will require immediate action, at pace and scale.*

[5] Climate Change Committee (June 2025) Progress in Reducing Emissions - 2025 Report to Parliament

**13. Agriculture and Land Use, Land Use Change and Forestry: How can the Scottish Government encourage sustainable land use, that is also productive for local communities?**

**Response:**

*The carbon budgets in the CCP show very little projected emissions reductions in agriculture despite each iteration of the CCC carbon budgets including significant reductions in emission driven by a reduction in meat and dairy consumption, which in turns would free up land for nature-based solutions such as woodland creation and peatland restoration. This transition would offer significant co-benefits including reducing Scotland's antibiotic footprint (and thus the odds of antibiotic resistance), reduce the odds of new pandemics emerging / spreading and could reduce financial pressure on the NHS through helping to address fibre deficiency in diets across Scotland.*

*Despite this, there are no details of the need for more sustainable/low carbon diets as a means of land-release in the draft CCP. These points underscore how this element of the transition to net zero is particularly important for improving sustainable development, which is emphasised in the SG's draft Statutory Guidance for the climate change act published earlier this year.*

*Support for farmers is paramount to encourage more sustainable land use and achieving a just transition. The CCP could include the fact that farmers will require significant support to protect crop yield within the context of a changing climate and to diversify their income streams away from carbon-intensive agriculture, with opportunities in areas such as woodland creation, peatland restoration, energy crops, and renewable energy.*

*CCP policy should include food labelling by emission intensity to make people aware of lower emission options and for public bodies to provide a high quality, plant-based options in parallel with support and incentives for farmer to transition to sustainable food production.*

*Within the draft CCP Sectoral Annex 2, the Scottish Government provide a statement to encourage individuals and households to source food locally to be more sustainable and support local economies. This will reduce food miles and avoid offshoring emissions to other countries. However, this is purely an encouraging statement, not supported by policy measures or as a means to reduce or release land from livestock agriculture for other more sustainable farming practices or nature-based solutions. It is also important to note that since more emissions tend to come from out with the transport phase of food production, the 'what' tends to be more important than the 'where' for emissions reductions.*

*Further information is available in the sources below:*

- *CCC (2025) Scotland's Carbon Budgets - Climate Change Committee*
- *Climate Change Committee (2025) The Seventh Carbon Budget - CCC*

**14. Agriculture and Land Use, Land Use Change and Forestry: What do you think about our proposals for planting trees and restoring natural habitats like peatlands?**

**Response:**

*While there are good details on planting trees and restoring natural habitats like peatlands in the draft CCP, there is a significant gap in terms of policy to support key parts of the CCC's Scottish*

*Carbon Budget's emphasis on the need for a reduction in meat and dairy consumption to gap of freeing up land for expanding nature-based solutions, which could also have significant co-benefits that would support sustainable development. Each iteration of the UK CCC reports has made this point which reinforces its central role as a facet of reaching net zero.*

*Policy should be designed to address the CCC recommendations "By the time of the Third and Fourth Carbon Budgets, the agriculture and land use sectors will be making the biggest contribution to emissions reduction in our pathway for Scotland. Together, agriculture and land use can reach Net Zero by 2045. Natural carbon sequestration, mostly increased tree planting and restoration of degraded peatlands, offsets the remaining emissions from livestock in 2045. This requires rapid scaling up of tree planting now because of the time it takes for trees to mature and start absorbing substantial amounts of carbon. The Scottish Government will need to support farmers and rural communities to diversify their incomes away from livestock farming and towards woodland creation, peatland restoration, agroforestry, and renewable energy."*

*The CCC note that the net zero transition will involve various measures that directly involve household choices and behaviours, including a reduction in average meat and dairy consumption. The CCC note that from 2030, agriculture is the main source of residual emissions, with limited options to deliver reductions. They recommend households consume on average 30% less meat and 20% less dairy by 2045, which will reduce emissions directly from livestock and free up land to enable peatland restoration, tree planting, and energy crops. It is important to note that the draft CCP also doesn't reflect the CCCs emphasis on the need to shift to low-carbon diets and realise the additional co-benefits for nature and health that this could offer.*

*The CCC also recognise that " There is a delay between the planting of woodlands and the time it takes for them to reach peak rates of absorbing $CO_2$, so immediate action is needed to capture these benefits later in the pathway. Scaling up these nature-based actions allows agriculture and land use together to reach Net Zero emissions by 2045."*[6]

*Examples of projects that are needed at pace and scale, include:*

*Glasgow City Region implementation and support of Clyde Climate Forest targets. Across Glasgow City Region the average broadleaved woodland network area is 119 hectares. By 2032 the Clyde Climate Forest aims to increase the average broadleaved woodland network area to 142 hectares. Broadleaved woodlands provide essential ecosystem services and wildlife habitat. Creating connected woodland networks will help to reverse the habitat fragmentation caused by decades of urban and transport infrastructure development and agricultural intensification. It will also help to protect biodiversity and offer migratory routes as the climate changes.*

*The current extent of land covered in forests or woodland in Glasgow City Region is 17%. By 2032 the Clyde Climate Forest aims to increase forest and woodland cover by 3% (9,000 hectares - approximately 18 million trees) and thereby be in-line with the woodland expansion target in Scottish Government's Climate Change Plan.*

[6] Climate Change Committee (May 2025) Scotland's Carbon Budgets

*Depending on the types of trees planted these new forests and woodlands could lock up 1.5 million tonnes of CO2 by 2045 - Scotland's target year for Net Zero. Larger scale targets similar to these could be reviewed to deliver against the CCC budgets, including consideration of land that would need to be freed up for nature-based solutions.*

*Further information is available in the sources below:*

- *CCC (2025) Scotland's Carbon Budgets - Climate Change Committee*

*We agrees with the level of ambition relating to the planting of trees and peatland creation and would welcome more specific details as to the additional funding mechanisms which will be made available to deliver these actions within the proposed timeframes. The proposals also align with the CCC priority recommendations for 2025 to ramp up tree planting and peatland restoration. The CCC note the significance of the forthcoming Land Use Framework in achieving this ambition.*[7]

*The proposals and targets should be divided into native and non-native woodland creation, which should also be accounted for within the monitoring indicators (Aligned with response to Question 29). Within the narrative, there should be reference to the fact that native trees support long-term biodiversity and through carbon sequestration address the twin crisis of nature and climate crises. There should also be cognisance taken of the climate modelling required to ensure that woodland species chosen are resilient to Scotland's changing and volatile climate and that they will still be the 'right trees in the right locations' for the next 25-50 years and beyond.*

*The total forestry cover should also be used as a metric, as this will give a more accurate measure of net gains/losses through ash dieback for example. If only new woodland areas are reported, and not woodlands lost, this is an incomplete metric.*

*In addition to the proposed tree planting and peatland restoration proposals, alignment with other adaptation proposals (including those set out in Scottish National Adaptation Programme 3) would be beneficial. This is particularly important as other nature-based solution opportunities provide similar or more improved carbon sequestration potential. These could include grassland and wetland creation, peatland enhancement (not required full restoration), land restoration (from soil erosion and wildfires).*

*Nature-based solutions are an effective means of improving the absorption potential of greenhouse gas emissions, increasing carbon storage potential, increasing flood attenuation and improving biodiversity and nature networks.*

*In order to meet the targets in this sector it is important to note that substantial funding mechanism are required for Local Authorities to deliver the required nature recovery and enhancement. This will be important for tree planting, including street trees, given the expected losses through ash dieback in particular, for Local Authorities and Scotland as a whole to achieve significant net gains in woodland. This funding should also account for the required ongoing maintenance costs, which are often overlooked, as well as separate funding streams for the development of required policy frameworks such as Forestry and Woodland Strategies and Ash Dieback Plans.*

[7] Climate Change Committee (June 2025) Progress in Reducing Emissions - 2025 Report to Parliament

**15. Agriculture and Land Use, Land Use Change and Forestry: How can the Scottish Government support farming to become more climate-friendly while continuing to support food production and improve biodiversity?**

**Response:**

*Key parts of the CCC's UK 7th carbon budget and Scottish Carbon Budget include a reduction in meat and dairy consumption and livestock numbers to free up land for nature-based solutions such as woodland creation and peatland restoration. Each iteration of the UK CCC reports have made this point but the need for this transition is not accepted in the CCP.*

*Support for farmers is paramount to encourage more sustainable land use and achieving a just transition. Farmers will require significant support to protect crop yield within the context of a changing climate and to diversify their income streams away from carbon-intensive agriculture, with opportunities in areas such as woodland creation, peatland restoration, energy crops, and renewable energy. This could be supported through revisions to existing subsidies to ensure compatibility with CCC targets.*

*In addition, the draft CCP and carbon budgets outline small scale expected reductions from agriculture, especially when compared to significant decarbonisation expectations in other sectors (such as building decarbonisation and transport). A more balanced approach should be adopted by the CCP, accompanied by adequate resourcing and financing, to ensure that all sectors contribute fairly to the national net zero goals.*

**Section 3: Impact Assessments (Questions 16-21)**

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.

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

**Response:**

*The CCP should address the compounding vulnerabilities of climate injustice, whereby those most affected by existing social inequities are hit first and worst by climate impacts.*

*Key focus areas for the CCP to promote equal opportunities in a sustainable future include:*

- *Reducing local fuel poverty.*
- *Reducing transport poverty and providing access to sustainable transportation and active travel options.*
- *Identifying frontline communities that are most exposed to climate impacts.*
- *Planning equitable flood risk management in deprived communities.*
- *Providing climate mitigation and adaptation investments in marginalised areas as identified by the SIMD and similar tools.*
- *Supporting career transitions for those in high-carbon sectors.*

*This is the first Scottish CCP underpinned by statutory just transition principles of climate justice. The CCP should therefore view the concept through the lenses of recognitional, procedural, distributional and transgenerational equity. This perspective should then be applied to all PPS within the sphere of influence of the CCP to ensure they advance climate justice through their implementation.*

*Specific Vulnerable Groups from an Equalities perspective*

*Age*[8] *- The effects of climate change are experienced by all age groups to some extent. Older people, specifically those who are considered to be at a socio-economic disadvantage, are more likely to be impacted by the potential negative effects of increased frequency of weather extremes, including flood events and temperature extremes which may exacerbate fuel poverty issues. There is also great scope to influence climate action amongst younger groups i.e. through the school curriculum. Global warming will continue decades after planetary net zero is reached. As such, younger generations are more likely to be exposed to greater climate change impacts over the course of their lifetimes.*

*Disabilities - Disabled adults are more likely to experience mobility difficulties that create obstacles to sustainable transport and evacuations during extreme weather events. Additionally, disabled individuals are likely to have greater 'energy needs' to maintain their health, including higher fuel use for heating, powering medical equipment and refrigerating medicines. Financial burdens of home care may also exacerbate fuel poverty and food insecurity by further constricting disposable income and accentuating supply chain shocks.*

*Gender Reassignment*[9] *- There are intersectional concerns for climate justice wherein gender non-conforming or trans individuals are more likely to be socio-economically deprived and thus more vulnerable to climate impacts. These impacts can include potential fuel poverty, food insecurity, less access to greenspace, flood exposure and additional geophysical risks.*

*Pregnancy and Maternity*[10] *- Extreme temperatures can adversely impact birth outcomes such as changes in length of gestation, birth weight, stillbirth and neonatal stress. Additionally, households with a baby are more likely to experience fuel poverty in Scotland.*

[8] Based on National Statistics (Scottish Government), Scottish House Condition Survey and IPCC
[9] Scottish Government (2024) Scottish Government
[10] Scottish Government (2024) Scottish Government

*Race*[11] [12]*- Ethnic minorities are more likely to be disproportionately affected by climate change due to continuing legacies of historic disenfranchisement. For example, communities of colour, particularly those of Black, African and Caribbean descent, are more likely to earn less than white workers. Lower income levels increase the likelihood of renting and barriers to access for flood insurance, creating systemic flood disadvantages. Additionally, Black and Asian communities experience marked disparities in air pollution and extreme heat exposure, at a rate of three and nine times their white counterparts respectively. These impacts emphasise the need to centre racial and climate equity within the CCP to ensure a just transition.*

*Sex*[13] [14] *- Women are disproportionately affected by climate impacts due to societal gender roles, specifically a higher likelihood to perform responsibilities such as childcare, meal preparation and home maintenance. Extreme weather events magnify the burdens of unpaid care and the continued gender pay gap, placing women at greater socio-economic risk. Ensuring policies within the CCP are examined through a lens of intersectional feminism will be key to ensure gender equity in implementation and delivery.*

*Sexual Orientation*[15] *- There are intersectional concerns for climate justice wherein LGBT+ individuals are more likely to be socio-economically deprived and thus more vulnerable to climate impacts. These impacts include potential fuel poverty, food insecurity, less access to greenspace, flood exposure and additional geophysical risks.*

*Other Marginalised Groups*[16] *- Unhoused individuals are exposed to the full force of increasingly frequent and intense extreme weather events such as floods and heatwaves. The impacts of houselessness also worsen underlying heath conditions, further endangering the wellbeing of unhoused people. Additionally, as climate change continues to worsen, more and more communities will be threatened by the impacts of sea level rise, resulting in forced migration and potential chronic houselessness. Further, individuals who become rehoused are still particularly exposed to fuel poverty and food insecurity concerns, emphasising the need to support unhoused people in a just transition.*

*The Fuel Poverty Act's evidence review also identifies [lack of] energy efficiency of the home as one of the four main drivers of fuel poverty*[17] *thereby highlighting the poverty alleviating potential of improved energy efficiency measures.*

*Given the on-going cost of living crisis, with significant increases in the cost of energy and petrol affecting communities and businesses across Scotland, the pathways to net zero set out in the CCP would entail harnessing the poverty-alleviating potential of these elements of decarbonisation and therefore offer cross-cutting benefits to economically marginalised groups.*

---

[11] ClimateXChange (2024) ClimateXChange
[12] Scottish Government (2024) Scottish Government
[13] Scottish Government (2024) Scottish Government
[14] UN Women (April 2025) United Nations Women
[15] Scottish Government (2024) Scottish Government
[16] Single Homelessness Project (2025) Single Homelessness Project
[17] Scottish Government (2020) *Lived experience of fuel poverty: evidence review* https://www.gov.scot/publications/evidence-review-lived-experience-fuel-povertyscotland/pages/3/#:~:text=The%20Scottish%20Government%20recognises%20four,is%20used%20in%20the%20home

**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?**

**Response:**

*One area which should be considered is the intrinsic link between climate mitigation and adaptation and how both the CCP and Scottish National Adaptation Plan 3 (SNAP3) feed into each other and help deliver the required outcomes. As set out in Questions 14 and 33, both processes should, at the very least, be integrated into a single monitoring and evaluation framework for climate at the national level.*

*This would help regional partnerships and local authorities create PPS which align with both climate mitigation and adaptation policy principles and ensure that the outcomes compliment and support each other in terms of delivery, data gathering, monitoring and achieving set targets.*

**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?**

**Response:**

*n/a*

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

**Response:**

*Additional data sources and further information links included throughout the consultation response to support and reference the content provided.*

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

**Response:**

*The impact assessment process undertaken as part of the suite of documents for the production of the Glasgow City Region Climate Adaptation Strategy and Actions Plan provide good practice examples of how the wider impact assessments, as well as a fully integrated risk and opportunity assessment can influence and improve the PPS development.*

*Further information is available in the sources below:*

- *Climate Ready Clyde (2025) Strategy and Action Plan and Impact Assessments*
- *Climate Ready Clyde (2025) CRC Climate Risk and Opportunity Assessment*

**21. 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?**

**Response:**

n/a

**Section 4: Strategic Environmental Assessment (SEA) (Questions 22-25)**

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.

**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?**

**Response:**

*We are content with the collated environmental baseline data gathered to assess the Draft CCP against. Additional data sources and further information links included throughout the consultation response to support and reference the content provided.*

**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?**

**Response:**

*The SEA factors that are most significant and should continue to be reflected in the CCP through improvement measures as it is finalised, include Climatic Factors; Air Quality; Population and Human Health; Water Quality, Soil and Geology and Biodiversity, Flora and Fauna.*

*With broadly positive effects anticipated through the assessment process of the proposed CCP policies, such as peatland restoration, increased woodland creation, promotion of active travel, and the transition to renewable energy, these are expected to lead to cleaner air and water, improved soil health, enhanced biodiversity, and increased climate resilience. The shift to electric vehicles is also projected to yield significant financial and health benefits for households and businesses.*

*We acknowledge the high-level approach adopted for the SEA ER; however, it would have been useful if the ER for the draft CCP further broke down the impacts on climatic factors by focussing on the largest sources of emissions (nationally) and provide further recommendations to highlight the more wide-ranging societal and environmental benefits of modal shift in transport and aligned with wider benefits for people and communities. Other SEA environmental factors (population and human health and soil and geology) should further acknowledge the importance the transition to low-emission agriculture and the direct links to additional societal change and health benefits through community enhancements (including improved resilience to climate change) as well as shifting dietary habits supported by the CCC.*

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

**Response:**

*We are content with the anticipated environmental effects and their predicted significance set out within the SEA Environmental Report for the Draft CCP.*

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

**Response:**

*We broadly agree with the proposed mitigation, enhancement and monitoring set out within the SEA Environmental Report. The suggested provision of more detail on future actions and accelerating the pace of change in certain sectors is particularly welcomed. However, it isn't clear how this has been taken into account within the Draft CCP. In addition, this increased level of ambition will have to be matched with adequate funding support for National and Local Government which the ER could have reflected in the development of more progressive alternatives.*

**Section 5: Monitoring Emissions Reductions (Questions 26-28)**

**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?**

**Response:**

*We agree that an annual monitoring report should be created against all major milestones required to reach net zero. Based upon the CCC's modelling: heat pumps, active and sustainable transport as a proportion of journeys, EV number, nature-based solutions, net renewable energy generation across Scotland, estimates of numbers that reflect the transition away from emission intensive agriculture etc. This level of reporting will help the public understand the pace of change and put the spotlight on underperforming areas, which require additional support and investment nationally.*

*Scottish Climate Intelligence Service*

*Public bodies across Scotland are using Scottish Climate Intelligence Service's Climate View Platform for area-wide emissions progress, as a dynamic modelling tool for area-wide emissions and as a way of identifying potential corrective actions for instances where public bodies are off-target. Alignment of the Draft CCP with this approach, including with the common language set out through the transition elements to area-wide mitigation proposed by SCIS, presents an opportunity to encourage a coordinated approach between public bodies across Scotland. The SCIS also offers the advantage of reducing public bodies' dependence on external consultants to provide climate modelling.*

*Procurement*

*The Statutory Guidance notes that typically over 90% of an organisation's scope 3 emissions come from its supply chain, which is broadly in line with the estimated emissions for East Dunbartonshire Council's supply chain. Given the Guidance's emphasis on climate action being taken as quickly as possible and being compliant with a 1.5C scenario, including by far the largest part of public bodies' emissions in baseline reporting is crucial.*

*While public bodies will need extra resource and a recommended methodology to achieve significant emissions reductions from their supply chain, it is crucial to maximising public bodies' impact on emissions reductions.*

*However, this also has to be considered against other, potentially incompatible or competing procurement legislation obligations and requirements so that expectations are realistic and deliverable. There is also an opportunity for less resource intensive reporting by requiring the Scottish Government and Scotland Excel to report on national contracts and frameworks which would be more efficient than numerous public bodies reporting on their smaller share.*

**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?**

**Response:**

*See response to Question 26.*

*Sub-sectoral data is helpful to highlight the sectors where action is having significant impacts, learn lessons from success measures and also track where additional support or policy changes are necessary to keep targets on track.*

**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?**

**Response:**

*We agree that use of timely indicators will help account for the time lag associated with GHG inventory data and will help inform the public on recent progress towards delivering key actions. This would be a good opportunity to ensure that time-based indicators for emissions reductions were allocated to specific Ministers to ensure accountability through the monitoring framework. Suggested milestones for these indicators should be set along with a prompt development and delivery period due to the known lag in data reporting.*

**Section 6: Monitoring Just Transition (Questions 29-33)**

**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

**29. 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.**

**Response:**

*See responses to Questions 30-33.*

*An Urban Greening Factor (UGF) metric to increase and improve the quantity and quality of urban greening across all urban areas should be included. The success of the UGF will depend on selecting plant species capable of withstanding future climatic stresses while continuing to deliver essential ecosystem services that underpin urban resilience. If all Local Authorities in Scotland develop a UGF metric (based on an agreed national approach), the data gathered would provide additional content for the Scottish Government to monitor the impacts of development and the net zero transition on the environment. This would be a step change for nature recovery and enhancement, while providing an opportunity to develop a more meaningful metric.*

*The target for woodland creation should be split and reported as native and non-native woodland creation to aid with the analysis.*

*The total forestry cover should also be used as a metric, as this will give a more accurate measure of net gains/losses through ash dieback for example. If only new woodland areas are reported, and not woodlands lost, this is an incomplete metric.*

*Alignment with other National PPS proposals and monitoring indicators should also be considered here, including those set out in Scottish National Adaptation Programme 3. This is particularly important as other nature-based solution opportunities provide similar or more improved carbon sequestration potential. These could include grassland and wetland creation, peatland enhancement (not required full restoration), land restoration (from soil erosion and wildfires).*

*Along with integrated ticketing, the experience of interchanging between different public transport modes needs to be considered as part of a just transition, with better alignment of routes, timetables and physical locations of interchanges. The Just Transition Indicator for public transport is affordability not availability, which is equally key in certain communities. An additional indicator on availability would give a more accurate picture of moving to a fairer society. The current Just Transition indicator for public transport is affordability not availability, which is equally key in certain communities. An additional indicator on availability would give a more accurate picture of moving to a fairer society.*

**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.

**Response:**

*All monitoring indicators proposed provide tangible benefits to people and communities throughout Scotland. Participation in decision-making is a key component to this. Along with the proposed indicator 1.1 (Proportion of people in Scotland reporting satisfaction with opportunities to influence (i) the Scottish Government's approach to delivering net zero, and (ii) local policy and planning decisions relating to net zero), additional indicators and monitoring of consultation arrangement and opportunities at a local level should be captured to provide a meaningful regional/local picture across Scotland. This data could be captured through a local survey or possibly integrated into the Public Bodies Climate Change Duties Reporting.*

**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).

**Response:**

*Concerning the proposed CCP monitoring to measure the impacts on local communities, set out below, will provide a useful monitoring framework to measure the impact and success of net zero developments, transition and enhancement projects.*

*Proposed draft CCP Indicators with a focus on communities:*

- *Indicator 1.1 Participation in decision-making: Proportion of people in Scotland reporting satisfaction with opportunities to influence (i) the Scottish Government's approach to delivering net zero, and (ii) local policy and planning decisions relating to net zero.*
- *Indicator 1.2 Community Energy: Operational capacity of community and locally owned energy installations in Scotland.*
- *Indicator 1.3: Community Benefits: Average value of community benefits committed from renewable energy projects commissioned in the last 36 months, where a community or developer form is attached to a project.*
- *Indicator 1.4 Changes to Places: The proportion of people reporting that changes to their local place due to net zero infrastructure and/or land use change have maintained or improved the quality of their local area.*
- *Indicator 2.1: Percentage of dwellings in fuel poverty.*

*Additional components to measure and monitor the impacts on communities also cover areas such as modal shift to sustainable transport (encouraging sustainable linkages with essential services and amenities, EV charging and promoting active travel) and local economy (green skills, jobs transition and sustainable investment). The Scottish Government Climate Change Plan Monitoring Report 2025 which was published in May 2025 outlines progress to date on some areas noted above.*

*It would be useful if more specific indicators on all areas relating to the community impacts were integrated directly into the CCP. This would provide a more robust and transparent monitoring framework and highlight the areas that are off track and those which require additional actions and measures to benefit Scotland's communities.*

*In addition, monitoring the projects that stem from Climate Action Hubs and the impact of distinct community orientated funding opportunities such as outputs from funding to support the installation of renewable energy infrastructure or other land use changes (e.g. through peatland restoration or tree planting).*

**32. What specific data or indicators could we use to monitor the extent to which workers in high-carbon industries are securing alternative employment?**

Ensuring positive outcomes for workers who have transitioned from jobs within high-carbon industries is central to delivering a just transition.

**Response:**

*We agree with the initial proposed indicator (3.1 - Number of recipients of the Oil and Gas Transition Training Fund) as an effective way to monitor the transition and alternative employment of these workers. This indicator is intended to monitor uptake of training by workers in the offshore oil and gas sector wishing to reskill and upskill for careers in renewable and sustainable energy.*

*However, there are limitations associated with this data concerning lack of follow-up data on whether the training enabled workers to gain secure jobs on the renewable and sustainable energy sector or accounts for those current workers in this industry requiring or wanting such a training opportunity.*

*Therefore, additional monitoring indicators and data sources are required to provide a more robust method of assessing the progress in this area, including the number of jobs advertised in low-carbon industries. This could also be supplemented with joint analysis with proposed indicator 3.2 Employment in low carbon and renewable energy economy in Scotland.*

*It would also be useful to broaden the monitoring of the CCP to other transitions highlighted as priority areas by the CCC and set up processes that identify where barriers exist, such as knowledge and skills gaps that may hinder progress. This would enable actions to be created to support all transitioning industries and progress. This should include:*

*- aviation and the share of sustainable aviation fuel (SAF) as a proportion of all jet fuel used in UK/Scottish aviation. In 2024, SAF accounted for only 2.1% in the UK and is mandated to reach 10% by 2030. The CCC also utilise the distance travelled by plane as a key monitoring indicator for the aviation sector and behavioural change.*

*- farmers diversifying away from livestock farming – Tracked through CCC suggested monitoring indicators, domestic livestock numbers and consumption of meat representing changes in national dietary behaviours. The CCC note that UK-wide reductions in the average consumption of meat and in livestock numbers are continuing. These are key to freeing up land required to increase nature-based solutions, natural carbon sequestration and improving our natural capital. In addition, monitoring the use of agricultural land for other natural capital uses, such as woodland or enhanced grassland or wetland creation would also be useful data to gather data on the impacts of the transition for agriculture.*

*- transition to a home-grown energy supply – Through renewable energy development consents such as CCC monitoring indicator, onshore and offshore windfarm operational capacity and solar operational capacity.*

*- electrification of heat in buildings – Through roll-out of low-carbon technologies such as heat pump (ground and air source) installations. In 2024, there was an increase in the UK of 56% of heat pump installations in the UK. According to the CCC, further acceleration is required. This is still being hindered by the ratio of electricity-to-gas prices.*

**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?**

**Response:**

*Given that the proposed monitoring framework for a just transition within the Draft CCP is solely based on emissions reductions, there should be consideration to producing a joint monitoring and evaluating framework which addresses climate mitigation and adaptation.*[18]

[18] Adaptation monitoring and evaluating is currently covered through a separate process for the Third Scottish National Adaptation Programme (SNAP3).

*This would provide a more joined-up approach and ensure a just transition is adequately considered and monitored for all anticipated climate change impacts.*

*Division of the just transition indicators into themes (set out below) provides a useful framework to monitor the impacts on various aspects of a just transition.*

1. *Communities and Place.*
2. *People and Equity (spatial and financial).*
3. *Jobs, Skills and Economic Opportunities.*
4. *Environment and Biodiversity.*

*As set out above, aligning climate adaptation monitoring and evaluation would provide additional benefits and contribute towards the monitoring of Environment and Biodiversity in this context, including the introduction and implementation of nature-based solutions (beyond those already proposed within the CCP – peatland restoration and woodland creation (including canopy cover in all local authority areas)), which could provide significant carbon sequestration potential. This could include grassland and wetland creation, peatland enhancement (not required full restoration), land restoration (from soil erosion and wildfires), blue and green infrastructure through urban greening.*

*This could be achieved by supporting and adequately resourcing, at the Local Authority level, as a key part of each authorities net zero (with an emphasis on offsetting) and climate adaptation planning to:*

- *Quantify the current carbon sequestration capacity of natural capital.*
- *Identify, evaluate and prioritise nature-based solutions opportunities based on carbon absorption, biodiversity enhancement and the delivery of heath, wellbeing and ecosystem co-benefits.*
- *Develop a climate modelling analysis to create a baseline of tree and shrub species suitable for planting in each area to increase climate resiliency.*

*Develop/Collate nature-based investment and capital spend data for projects that enable transition to net zero, while enhancing the natural environment would provide useful data to monitor and track investment in nature and payback periods to promote future investment opportunities.*

*East Dunbartonshire are currently developing an Urban Greening Factor (UGF) metric to increase and improve the quantity and quality of urban greening across all urban areas. The success of the UGF will depend on selecting plant species capable of withstanding future climatic stresses while continuing to deliver essential ecosystem services that underpin urban resilience. If all Local Authorities in Scotland develop a UGF metric, the data gathered would provide additional content for the Scottish Government to monitor the impacts of development and the net zero transition on the environment. This would be a step change for nature recovery and enhancement, while providing an opportunity to provide a more meaningful metric.*