

Response to call for views on Scottish Government's draft Climate Change Plan (third Report on Proposals and Policies – RPP3)

Sustaining Dunbar is a Community Development Trust that is also a part of the global 'Transition Network' of communities. We believe that how we navigate and manage our transition away from fossil fuel dependence is the greatest challenge of our time.

This challenge is one of complex systems change. For most people, the most meaningful level of scale at which to understand and engage with systemic change is at the level of community. Our communities need to become empowered and resilient enough, not just so as to be able to cope with change but to actively engage with creating and shaping a better future.

Currently the Plan shows little understanding of the crucial contribution that communities can, and want, to play in addressing climate change. Successful climate action cannot be delivered purely by top-down direction. The Plan should be an opportunity to bring together the community empowerment agenda with climate action. The role of Government should be to create the 'material' context and conditions that support and empower communities to create their own, locally adapted, low-carbon futures. Scotland's community sector is particularly active and well networked, through the Scottish Community Alliance, and has extensive reach into the 'social' sphere across Scotland.

There is an opportunity for the Plan to recognise the importance of local democratic renewal and, in particular, the role of local place plans (ref. Places, People and Planning –a consultation on the future of the Scottish planning system) which should be focussed on the creation of climate resilient communities, linking local 'community planning' with land-use planning.

Whilst we applaud the emphasis on increasing ambition in recognition of the UN Paris Agreement Ratchet mechanism ("The new Climate Change Bill will set a new and more testing 2020 target"), we urge that this also recognises the need for a future, net-zero goal. There also needs to be more explicit recognition that much of Scotland's progress in meeting emissions reduction targets to date has been thanks to exporting our emissions overseas. Consumption based emissions should be built in to key targets. If the energy system is decarbonised, there is a huge economic opportunity to develop a domestic manufacturing base –for example around offshore wind energy. This could have multiple benefits around employment and re-training, local economic multiplier effects (including through local/community ownership), development of export markets and cost reductions through large-scale deployment.

We are concerned by the reliance on Carbon Capture and Storage in the draft Plan. There will need to be a critical, independent evaluation of CCS very soon to ensure that it really does have the capacity to deliver at scale, within the quoted cost parameters, before we become locked in to that energy path. We suggest that it would be prudent to develop an additional scenario that avoids use of CCS. Many such scenarios have been developed elsewhere, as referenced here: <http://zerocarbonbritain.com/images/pdfs/wgrz-full-report.pdf>

One proven technique for capturing and storing carbon is through rebuilding soil carbon levels. Whilst this receives passing mention in the draft, there is scope for much greater ambition in incentivizing changing agricultural practices and support for 'carbon farming'. Likewise, the importance of diet is barely mentioned in the draft. There is scope for significantly more ambition in reducing emissions through a change to healthier diets, with co-benefits of improved health and wellbeing and release of land for carbon sequestration.

On transport, the Plan assumes a continuing increase in 'demand for the movement of goods, services and people'. With community led planning, a move to re-localised economies and proper investment in active travel, we believe that there is significant opportunity to reduce the need to travel. This could bring significant co-benefits of improved (mental and physical) health and well-being, local economic regeneration and local resilience.

Lastly, we would comment that it is very difficult to 'assess appropriateness and effectiveness of the proposals and policies within the draft Plan for meeting the annual emissions targets and contributing towards the 2020 and 2050 targets' because the assumptions behind the TIMES model are not explicit. Opportunities to engage the public with the Plan would be significantly enhanced if the assumptions behind the model were clearly described in accessible language from the outset.

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10th February 2017