![SURF - Scotland's Regeneration Forum logo]

SURF CONSULTATION RESPONSE:

Scotland's Draft Climate Change Plan: 2026-2040

About This Paper

In November 2025, the Scottish Government launched a consultation on Scotland's Draft Climate Change Plan, which sets out policies and proposals that the Scottish Government will take forward in relation to carbon reductions between 2026 and 2040. While SURF is generally supportive of the ambitious climate targets set out in the strategy, more must be done to alleviate poverty. A true just transition means moving beyond the important principle of compensation and mitigation for those communities immediately affected (such as the North East) by using climate change policy and action to further address poverty and regenerate left-behind communities throughout Scotland. With poverty currently deepening across Scotland, it is vital that the costs of climate action are never passed on to already disadvantaged communities, which often contribute very little to overall emissions, and yet frequently contend with many of the negative externalities, such as pollution and wider inequality.

Relevant background on this consultation can be found here.

Please see below SURF's response to selected questions from this consultation.

Section 1: Delivering a Just Transition

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

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

This is integral to ensuring that climate change is part of a wider process of societal change. Climate change work and adaptation without a just transition risks further deepening inequalities.

If the just transition was already working as it should, we would have seen a dramatic decrease in inequality and poverty. In reality, we have seen deepening inequality. The strategy mentions that Scotland is over halfway to achieving the net zero emissions target by 2045, but the first half of that journey has not come paired with what we would consider a just transition.

Despite some progress, the Joseph Rowntree Foundation found in a 2025 report that poverty in Scotland is deepening, with 1 in 10 people in very deep poverty, and 1 in 4 children growing up in poverty. Not only does poverty now extend to those in-work, it continues to present issues for those in receipt of benefits – neither work nor state support are now appropriate safeguards against poverty. Relative poverty is now on the rise after falling to a low in 2012. Societal transitions – both in terms of climate change and wider economic shifts such as industrialisation or globalisation – have always disproportionately affected the poorest in society.

Although it is unreasonable to assume that a Just Transition can wholly address the complex poverty issues in Scotland today, it is clear that the challenge is vast, and that a more holistic approach to both poverty reduction and a just transition will need to be sought if these inequalities are to be tackled meaningfully. There is too little evidence, at the moment, to suggest this is the case. For that to change, a new, more realistic approach should be taken to the just transition, one that goes beyond good language and intent, and fully embeds clear poverty alleviation measures within the climate change strategy.

It is encouraging to see inequality and poverty highlighted in the last of the just transition principles – but the link to both is made primarily in the context of resource efficiency and economic sustainability. 'Helping to address inequality and poverty' is a different emphasis from linking a just transition directly to poverty alleviation, with clear targets.

Question 2: We recognise that workers face particular impacts from the Plan and we have outlined our approach to supporting the transition of the workforce, including skills for jobs. What skills, training and qualification provisions will be most important in a net zero future and what more could be done to support them?

This question should be explored in collaboration with those most affected by the planned transition. It should also be linked to a clear green industrial strategy. Although an industrial strategy exists at a UK level, no specific policy initiatives exist in Scotland; this question should ideally be framed as part of that wider industrial strategy to a green, sustainable, wellbeing economy.

Question 3: The Plan will bring opportunities and challenges for businesses and employers. How can we best support employers across the private, public and third sectors to make the changes needed and seize the benefits of net zero?

For the public and third sectors, there needs to be targeted support in place to help with this transition. Many local authorities, public agencies, and community groups do not have the funding reserves to deliver on the ambitions set out in this plan without significant funding support. In a time of dwindling public and third sector resources, there is widespread concern about the ability of government support to alleviate some of these challenges given wider pressures.

Question 4: Our approach recognises that some of the Plan's impacts will have greater implications for particular regions of Scotland. What are your views on our approach to supporting places where the transition presents particular regional impacts?

It is right that particular attention is paid to areas where the Plan is likely to have significant impacts. This should be a key focus of the Plan moving forward.

However, a just transition is often conflated with support only for those workers and communities directly affected by, for example, energy transitions (i.e. related to North Sea oil, etc.). While this is important, a just transition is not just about compensation and mitigation; it is about ensuring that the move to a green and low-carbon economy is fully equitable. For SURF, this is fundamental to anything climate-related.

Equity is not just about supporting those communities that are immediately affected by the Plan (although it clearly must be that). It is also about supporting other left-behind communities, and using climate change policy and action as way to galvanise wider regeneration and poverty alleviation. This is a principle that is often not stated explicitly in climate change plans or even understood by many, and it is something SURF would like to see stressed more in the overall strategy.

Section 2: Sectoral contributions, Policies and Proposals

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

Buildings (Residential and Public)

Question 5: How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?

Funding should be prioritised to decarbonise homes that are for social or affordable rent, ensuring that the costs are not passed on through increased rent levels. Policy should be structured to ensure that tenants of private rented accommodation do not lose their tenancy if purchased by a registered social landlord who then undertakes retrofit measures.

The decarbonising of homes in the Private Rented Sector looks likely to be driven by the requirement of higher rated EPC but this should only be in conjunction with rent controls to prevent improvement costs being directly passed on to tenants – already experiencing unprecedented increases in rent.

Additionally, the Scottish Government's plans for minimum EPC ratings for the PRS sector may also have an adverse effect on housing supply and security. It has been noted that this may lead to a wider sell-off which could further constrain the PRS and put more pressures on local authorities and housing associations – although it may admittedly free up the housing market somewhat. In areas where housing shortages are already particularly acute, this poses even more issues – a private landlord renting three properties on a small island, for example, deciding to sell his portfolio could have a significant impact on the demographics of such a community. We have seen this recently in Fife with a large institutional investor evicting up to 40 tenants, which threatens to change the demographic make-up and community fabric of entire villages and areas.

This also raises the wider issue of existing legislation (i.e. new PRS tenancies needing to meet EPC Band C by 2028) and the feasibility of achieving such an

outcome without significant government intervention – especially considering Scotland's older housing stock. Although some support exists already (i.e. Home Energy Scotland), not everyone is eligible for that support, as it is geared towards owner occupiers, who are unaffected by that specific EPC legislation.

There are valid questions about the methodology of EPCs, especially in rural and island areas (i.e. those not connected to the grid, for example, or those living in historic buildings, such as those with thatched roofs or traditional uninsulated stone buildings). It is therefore important that the Scottish Government proceeds with the EPC reforms and considers various building typologies, grid connections, etc.

Decarbonising homes will look vastly different in rural and island areas as well, and this will require a targeted effort with significantly more funding in these areas. There must be an awareness from within Scottish Government that such investments are more complex and expensive for rural and island communities, and bespoke approaches should ensure these areas are not left behind.

Lastly, there is a complex question to be asked about the building of new homes, and to what EPC standard or energy efficiency this should be done. At the moment, the funding landscape (primarily through LA funding and AHSP) is not sufficient to meet the ambition outlined in both this strategy, but also the wider housing crisis. To achieve this, more funding will be required.

With house completions below what they should be, how do we strike the right balance: funding fewer highly efficient homes or choosing for a larger number of slightly less energy efficient homes?

Question 6: How can clean heating systems (such as heat pumps) be made more affordable for everyone?

Government subsidy and support – especially for those living in (fuel) poverty.

Transport

Question 7: Which of the following would be most effective in enabling you to transition your vehicle(s) to zero emissions alternatives? Please rank your choices from highest to lowest priority, where 1 is the highest priority. Please only give one ranking to each option:

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

1. Cost of new zero emissions vehicles needs to come down

2. Cost of used zero emissions vehicles needs to come down

3. Reliable infrastructure for vehicles (such as fuel or charging networks)

4. Noticeably cheaper running costs (including electricity, maintenance and insurance)

5. Convenient access to public charging infrastructure

6. Ensuring an adequate number of trained mechanics available to perform essential maintenance and repairs

7. Access to funding support /low cost finance

8. All of the above

9. Other (use box below)

Public Transport affordability and connectivity is more important than all of the above. This is one of SURF's four key policy priorities for the upcoming Scottish Parliament, and we feel that government support should focus on further strengthening the public transport system in Scotland, which will have more of an impact on transport poverty (and wider poverty) than all the measures above.

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

To move beyond consultation into a partnership approach requires both resourcing and local democratic structures that have real power. It also means that communities must be organised, with – for example – active community councils, which is not always the case in every community in Scotland. There is, for example, a link between deprivation and inactive community councils, suggesting that poorer areas suffer from a lack of democratic representation that frustrates both community engagement and participation. It means that in many areas, there is no vehicle for this participation to occur effectively. While it can occur through, for example, local community groups, these are not always located in all places, and as they are not democratic, would not be the best vehicle for deliberative and participative processes.

In our recent Manifesto for Regeneration, SURF calls for more resourcing for local democracy, with community councils furnished with more funding and power to take decisions at the most local level possible.

Supporting communities to participate in planning – through consultation for example – is one level, but moving to a fully engaged and citizen-driven model requires the full use (and resourcing) of democratic processes.

We already know that, when resourced, communities can take the lead in planning key local infrastructure, which has traditionally been something for local and transport authorities to deal with. Saint Paul's Youth Forum – a 2024 SURF award winner – designed the first grassroots travel infrastructure in Scotland, with support from Sustrans and Glasgow City Council, which led to community dialogue and involvement that then led to wider transport designs which are now being taken forward by Glasgow City Council through the Flourishing Molendinar project. This highlights how – when resourced – local communities can take the lead on travel infrastructure and be the first part of a wider process in planning transport solutions.

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

Make it easier, cheaper, and faster to take public transport.

Energy Supply

Question 11: What are your views on Scotland generating more electricity from renewable sources?

Generating electricity is one thing, but seeing the benefits of that generation flow down to ordinary consumers through cheaper (and more predictable) energy bills is of more importance. At the moment, Scotland generates a significant amount of local electricity, but remains the UK nation with the highest electricity bills – this is not a sustainable or equitable model and reduces buy-in to wider climate change measures. Although we appreciate that Energy is a reserved matter, there is more that a Scottish Government can and should do to further alleviate energy bills for those living in (fuel) poverty.

Moreover, large renewable projects are often contentious and more engagement with communities is required at earlier stages to ensure that those most affected by

proposed projects are heavily involved at every phase and feel empowered (see our previous point about community councils playing a role within this).

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

Question 13: How can the Scottish Government encourage sustainable land use, that is also productive for local communities?

This will depend on the communities in question. A blanket approach that does not recognise regional, cultural, and historical differences is not appropriate here. For example, large-scale farming on the mainland is a very different agricultural proposition (and has a different impact) than crofting in the highlands and islands. Crofting has been shown, for example, to have positive effects on the development of the Machair in the Hebrides, and plays a large role in local economies, biodiversity, and community resilience.

Engaging directly with communities is crucial, and can help pave the way for a resilient and sustainable use to land use that recognises the importance of land to different communities in Scotland.

Question 14: What do you think about our proposals for planting trees and restoring natural habitats like peatlands?

Agree with the approach as set out.

Question 15: How can the Scottish Government support farming to become more climate-friendly while continuing to support food production and improve biodiversity?

It is interest to note that of the various sectors, agricultural emissions are projected to fall fairly gradually over the next decades, certainly in comparison to other sectors. While this is not in and of itself an issue, agriculture remains a major emitter, and with so little of our food and drink produced for a local Scottish market, a wider shift may be needed to incentivise growers to focus on products for domestic markets, thus improving our food security. This also links to the wider questions around behaviour change and consumption, especially animal agriculture. The 20% shift away from meat and dairy consumption by 2035 seems a somewhat arbitrary figure, without wider evidence to support this.

This echoes a wider issue around Climate Change policies, namely, how government can effectively incentivise behaviour shifts for people that may be resistant to that change, especially around normalised behaviour such as car usage and meat consumption. For some, driving a car is a choice that can, relatively easily, be made differently; for others, it is a necessity that is based on poor connectivity and the expense and inefficiency of public transport. The Climate Change plan makes no effort to differentiate between these various forms of consumers: i.e. those who have little or no choice in the matter, those living in poverty driven mostly by cost-of-living pressures, and those that do have the ability to make different choices, but choose not to – simply because it is easier, or more comfortable, or more pleasant. This is also a vital part of the just transition – acknowledging where behaviour is fixed and largely determined by circumstance, and who among us have the luxury to make different choices, and why.

Integration with the Good Food plan is also key, and – as with so many policy initiatives – understanding the embedded inequalities within food is crucial to understanding where policy can have wider effects, such as on public health.

Section 3: Impact Assessments

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

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

As with most large-scale societal shifts (i.e. industrialisation, globalisation, digitisation), the most affected are always the least advantaged in society – those people and communities living day to day who cannot afford the luxury of adjusting their lifestyles through sheer affordability. As we have mentioned in previous answers, SURF strongly believes that poverty alleviation must be at the core of the road to net zero, and efforts should focus on those communities and areas that are already disadvantaged.

Section 5: Monitoring emissions reductions

The following questions concern the reporting of annual emissions reductions.

Question 26: What are your views on the proposed approach to reporting annual emissions output and how this could support public understanding of Scotland's progress towards achieving our Carbon Budgets?

One thing the Scottish Government might do well to consider is to move away from comparing reductions against distant baselines. Although it is of course necessary to establish a baseline, repeatedly mentioning this means people are most likely to be complacent.

Comparing emissions (let alone something like the economy) in a more than thirty-year period is not useful – and inflates progress we have made, much of which has come from a logical transition away from coal and other high carbon technologies. In short, those figures and baselines ultimately make us feel we've come very far, when in fairness, progress – especially recently – has been more limited. Narrowing horizons and breaking down progress into smaller chunks of time is more useful and helps galvanise action.

Question 27: How useful do you think reporting emissions statistics at a more detailed level (including at the sub-sectoral level), would be in helping people understand key sources of emissions, and our progress in reducing them?

This would be useful in breaking down emissions and where targeted action is most required. It should also form the policy rationale for why political decisions are being taken, and can help to further democratise access to key information about climate change.

Section 6: Monitoring Just Transition

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

1. *Participation in decision making*

2. *Community energy*

3. *Community benefits*

4. *Changes to places*

5. *Fuel Poverty*

6. *Transport affordability*

7. *Socio-economic impact on oil and gas communities*

8. *Impact on household finances in oil and gas communities*

9. *Access to training for offshore oil and gas workers*

10. *Green jobs*

11. *Impact of energy prices on small businesses*

12. *Air pollution*

13. *Woodland creation*

14. *Peatland restoration*

Question 29: 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.

Public Transport Connectivity is also an important indicator that can and should be measured. Although affordability is useful, at the moment, too many in Scotland – especially in rural and island areas – are forced into car usage because of poor connectivity. For some, poor connectivity means it is not so much a question of affordability, but of transport systems existing in the first place.

Moreover, affordability also encapsulates car use. If, as the plan sets out, car use is to be reduced (and to an extent discouraged), then affordability measures the wrong thing (i.e. is it more affordable to drive a car). Whereas with public transport, affordability is a useful measure to assess potential uptake, with car usage, affordability is likely to achieve the opposite – as we know that affordable car ownership leads to more cars in circulation.

Having an indicator for public transport connectivity would help to focus on how public transport is both improving (in terms of cost) but also scale, reach, and ease.

Although Indicators 2.3, 2.4 and 3.1 rightly focus on communities that are highly impacted, there must also be a focus on other communities experiencing poverty, many of which have been the victims of previous economic shifts (i.e. de-industrialisation). Again, this approach focuses on compensating those communities

and people for a loss of jobs, economic activity, and opportunities. But what it does not do is frame a wider movement – or just transition – towards a greener economy, with disadvantaged areas that fall out-with the North East, for example, also experiencing the wider benefits of this transition, through for example employment, training, etc. The approach as set out is one that mitigates poverty in areas vulnerable to the transition; a wider approach that looks to involve other areas experiencing deprivation is one that actively alleviates poverty much more broadly – and uses climate change policy as an active catalyst to do so. This subtle difference represents the difference between a reactive and a proactive approach.

Regarding Indicator 3.2 (Green Jobs), SURF would like to see this broken down into regional areas. While a Scotland-wide metric for green jobs is useful – and tells us something about the wider shifts in our economy – what it does not tell us is whether these jobs are taking place in areas that need them most. If these jobs are all concentrated in areas with low deprivation, high skills, and highly educated people, then even a staggering increase in green jobs does not equate to a just transition. Instead, it merely represents a shift in employment for those already employed – a trend which is likely to happen anyway. By measuring total green jobs, the data merely affirms that these jobs are increasing, when the real policy interest should be on extending the benefits of those new jobs to overlooked communities, and using these new industries as ways to regenerate communities, rather than concentrate more wealth and opportunities in areas that already have it.

Data should be broken down into more granular geographical areas (smaller than LA level), that enable us to highlight which areas are benefitting most (or the least) from new jobs.

Indicator 4.1 (Air Pollution) - we know that the negative externalities of climate change always disproportionately affect poorer communities. This data set should be broken down – to ward level, preferably – to understand how air quality is improving (or not) in certain areas. As this is also a key indicator of community health, this should be a priority – and again highlights how a just transition should seek to address these historic inequalities in an equitable way.

Saint Paul's Youth Forum in Blackhills is again a good example. Surrounded almost entirely by motorways, it has severe issues with air pollution, which greatly affects health outcomes. For our Just Transition to be a success, we need evidence that it is actively tackling pollution in the areas with the worst pollution, not incrementally improving it across areas with low levels already.

Question 30: What are the most appropriate indicators for judging whether we are achieving meaningful public participation in decisions related to the climate? This includes both the quality of the participatory process itself, and the impact of that participation on the decision-making process.

It is a misconception to assume that communities are not already engaged in difficult conversations around climate change. Many communities already have fora and organisations set up that actively deal with climate change and adaptation in ways that are highly localised. Many of these networks already exist; engaging with them simply requires a proactive step from within Government to embed local knowledge in a way that is tangible and real, not tokenistic.

SURF feels that the best vehicle for these conversations to occur at a local level are Community Councils – which should be further empowered and resourced to play a more active role in their local communities, including on discussions around climate change.

The creation of Community Action Plans, for example, also provides a useful insight into the priorities of communities and can help embed public participation at a development level. SURF believes a Community Action Plan Fund can be a useful policy tool for funding such conversations, which could also provide wider community planning benefits.

Question 31: What indicator would provide the best measure of the impact of net zero development in local communities across Scotland? For example, the impact of the installation of renewable energy infrastructure or other land use changes (e.g. through peatland restoration or tree planting).

There is no replacement for direct community engagement to understand what the impact of policy is. Good community involvement should also occur at the outset of any development or project, which then provides a useful follow-up channel to re-engage with communities once the project is complete. SURF strongly believes that people should have a say in what happens to their communities, and that they should feel empowered to co-create both policy and practical solutions.

Question 32: Ensuring positive outcomes for workers who have transitioned from jobs within high-carbon industries is central to delivering a just transition. What specific data or indicators could we use to monitor the extent to which workers in high-carbon industries are securing alternative employment?

One of the only (and best ways) to do this would be to commission a longitudinal study that seeks to track employment opportunities (along with the wider functioning of the community) for those transitioning away from high-carbon industries. There is no fast-and-easy way to assess whether the long-term impacts of this transition are harmful or not; SURF would like to see a concerted effort to study this in a way that seeks to understand the impact of these transition on both people and their wider community.

End of SURF's response

Augustijn van Gaalen, Policy & Advocacy Manager, January 2026

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