DRAFT CLIMATE CHANGE PLAN 2026-2040

Argyll and Bute response

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SECTION 1: Q1-Q4 JUST TRANSITION

Q1: What are your views on our approach to delivering a just transition for people and communities?

The Council is supportive of embedding just transition principles and Argyll and Bute as a region is uniquely positioned to demonstrate place-based delivery as Scotland's only net-negative emissions authority. However, three structural reforms are essential to enable meaningful rural and island participation.

Investment must match participation expectations. Operating across 6,909 km^2 with 28 inhabited islands and approximately 87,800 residents, Argyll and Bute is a diverse region and manages extensive statutory climate obligations. The Council specifically notes Environmental and Climate Change as one of its Corporate Priorities and is committed to net-zero as a priority. However, national funding to support the Council is vital to be able to participate in the Climate Delivery Framework. Policy co-design as suggested becomes unachievable without workforce investment proportionate to geographic scale and statutory burden, creating an equity gap where rural authorities are excluded from shaping national policy through lack of resource, not capability. At present Argyll and Bute Council employ a single Climate Change Officer but focus climate change activity through a multi team Board. However, to deliver the commitments within the national Plan this will require to be scaled up. The Council recommend a national Climate Officer Capacity Fund enabling councils to scale teams to meet expanding obligations.

Skills gap analysis represents a foundational requirement before training investment. Internal submissions identify that councils lack in-house expertise to determine compliance needs and future job requirements, requiring skills assessments to inform strategic workforce plans and training budgets. This capacity deficit prevents evidence-based workforce development aligned with net zero obligations.

Consumer Impact Assessment absence from the Plan represents a significant omission. Given the scope of transition policies affecting heating, transport, and energy costs - all disproportionately higher in rural and island Scotland - systematic consumer impact analysis should precede policy implementation, not follow complaints about affordability.

Affordable implementation pathways must address how compliance costs compound in rural contexts. Ring-fenced capital often requires unfunded revenue support, constraining core services. Carbon assessments for projects exceeding £5 million add costs without resource allocation. Fair Work First conditionality creates disproportionate burden for small rural employers with limited capacity. The Council recommend flexible compliance mechanisms with light-touch approaches for micro-grants and community benefit funding.

Regional Just Transition investment must recognise that cumulative rural disadvantage equals concentrated urban impacts in severity. The Plan appropriately supports the North East and Grangemouth with dedicated funding. Argyll & Bute's challenges are dispersed but equally material - grid constraints stalling renewables, ferry decarbonisation costs, fuel poverty reaching 47% in some island communities where the majority face off-gas-grid transition costs significantly higher than mains gas areas. The Council recommend establishing a Rural and Island Just Transition Fund calculated using per capita equivalence to North East allocation, adjusted for delivery cost premiums.

Argyll & Bute seeks this investment as enabling infrastructure for delivery. Our renewable capacity, carbon sink assets, and net-negative status position us to deliver Scotland's targets whilst building a resilient rural green economy that benefits host communities equitably.

Q2: What skills, training and qualification provisions will be most important in a net zero future?

Skills gaps directly constrain climate obligation delivery across rural Scotland. Heat pump installer scarcity delays housing decarbonisation, fleet technician shortages affect transport transition, and specialist capacity limits nature-based solutions. Three priorities require strategic intervention.

Heat transition skills represent the most critical challenge. Our predominantly off-gas-grid housing requires MCS-accredited heat pump installers, but national shortages are compounded by unwillingness to undertake remote island work involving ferry travel and overnight stays. Community Planning Partnership proposals for green skills training facilities aligned with rural heat transition needs could deliver local capacity rather than perpetuating dependence on contractors travelling from urban centres. Such provision must include island logistics capabilities and defined employment pathways connected to local labour markets, not generic qualifications disconnected from rural employment opportunities.

Fleet electrification capacity requires parallel workforce development. Council vehicles, lifeline ferry services, and ambitious EV sales targets demand mechanics trained in high-voltage systems, battery management, and EV diagnostics. Maintaining vehicles locally is essential in island contexts, not optional. Funded transition training for existing mechanics and mobile training units visiting rural depots would build necessary infrastructure for transport decarbonisation at the pace policy demands.

Land management and climate governance skills complete the requirements. Nature-based solutions need expertise in peatland restoration, deer management, and carbon accounting. Expanding Peatland ACTION training to include farm-level carbon literacy would support the rural workforce managing Scotland's largest carbon sink assets. Climate governance training for senior leaders, elected members, and procurement teams would enable strategic climate-literate decision-making across council operations.

Existing professional development pathways require recognition and expansion. The Council's ICE Training Scheme currently delivers Civil Engineers qualified in PAS 2080 standards - whole-life carbon assessment, decarbonisation, and climate adaptation design - demonstrating that rural authorities already build climate-competent technical capacity where strategic investment exists. Scaling this model across procurement, asset management, and service delivery teams would embed climate literacy organisationally rather than concentrating expertise in isolated climate roles, building systemic capacity for net zero delivery across council operations.

Education workforce climate literacy represents a statutory requirement currently under-resourced. Learning for Sustainability (LfS) forms part of the Scottish Curriculum, with the LfS 2030 Action Plan mandating delivery by all education practitioners via GTCS professional standards. However, visiting education staff working across multiple rural and island schools face practical transition barriers - multi-school days demand charging infrastructure at every school, including smallest remote sites where private sector investment is commercially unviable. Ferry and air travel remain essential for educational support to island schools, with operational examples including pupils and staff flown for day access to provision. Transition planning must resource education-specific logistics - charging at all school sites, adjusted mileage expectations for visiting staff, and funded support for statutory outdoor learning and school grounds biodiversity work.

The Council recommend establishing a Rural and Island Skills Partnership equivalent to the Energy Skills Partnership model, recognising that workforce challenges differ fundamentally from urban Scotland and require place-based solutions tailored to rural delivery contexts.

Q3: How can we best support employers to make changes and seize net zero benefits?

Supporting employers to seize net zero opportunities requires recognising that Argyll & Bute's economy comprises 94% micro-enterprises and SMEs across primary sectors, tourism, and hospitality. Place-based approaches must address rural operating contexts.

Accessible support delivery is fundamental. Enhanced incentives for energy assessors to undertake island visits, grant rather than loan support for businesses under ten employees, and funded agronomist visits for carbon auditing would enable participation currently prevented by geographic isolation. Regional Net Zero Business Advisors co-located with local authorities, providing free face-to-face support, would deliver place-based understanding that centralised telephone advice cannot achieve. Sector-specific decarbonisation toolkits for tourism operators, hospitality businesses, and aquaculture enterprises would provide practical guidance reflecting rural operations.

Primary sector simplification should address persistent capacity constraints. Agriculture, aquaculture, and forestry enterprises would benefit from one-to-one advisory support for Whole Farm Plans and digital monitoring systems, addressing digital exclusion affecting rural producers. Supported visits enabling agro-businesses on tight margins to access carbon auditing and nutrient management planning could reduce operating costs whilst meeting environmental obligations, reframing transition as economic opportunity rather than compliance burden.

Local authority consultation must precede national scheme announcements. Internal operational experience demonstrates that Scottish Government initiatives frequently assign councils promotional, administrative, and fraud-prevention roles without advance consultation or resource allocation. This undermines delivery effectiveness and strains council-community trust when schemes launch without local readiness. Early engagement protocols - requiring confirmed local authority agreement before public announcement of grants, funds, or initiatives - would enable councils to prepare appropriate support infrastructure, train staff, and establish local partnerships, preventing the implementation gaps that currently frustrate businesses seeking support.

Local supplier engagement frameworks offer emissions reduction co-benefits. Procurement reforms enabling councils to prioritise local contractors reduce transport emissions whilst building rural supply chain capacity. Funded training for local suppliers in low-carbon materials and methods would create regional delivery capability aligned with place-based climate investment.

Community and third sector proportionality requires light-touch compliance. Fair Work First requirements for micro-grants under £10,000 and community benefit funding guidance recognising island population scales would ensure policy supports rather than constrains community action. Third sector climate capacity building through funded coordination roles would enable voluntary organisations to participate without diverting scarce resources from service delivery.

Education services face distinct employer transition challenges requiring targeted support. School infrastructure decarbonisation demands charging points at all sites to enable visiting staff (psychologists, quality improvement officers, support services) conducting multi-school days across dispersed geographies. Private sector charging operators consider small rural schools commercially unviable, creating infrastructure gaps undermining transport electrification. School trip providers face electric bus availability and operational willingness challenges in remote areas, with cost increases transferring to schools and families already managing higher rural living costs. Support mechanisms must address education-specific contexts - capital funding for school charging infrastructure regardless of commercial viability, incentives for bus operators serving remote school transport contracts, and recognition that educational access equity demands adjusted implementation timescales matching rural delivery constraints.

Supporting rural employers means enabling them to see carbon transition as opportunity rather than burden. This requires flexible support mechanisms designed for rural contexts - heating upgrades in listed buildings, ferry-dependent supply chains, remote workforce recruitment, and seasonal trading patterns all demand approaches that acknowledge rural businesses operate fundamentally differently from urban equivalents.

Q4: What are your views on supporting places with particular regional impacts?

Argyll & Bute's regional climate impact profile differs fundamentally from the North East and Grangemouth but demands equivalent policy attention and investment. As Scotland's only net-negative emissions authority (-4.12 tonnes CO_2e per capita), our contribution to national climate goals is substantial, yet transition policies risk imposing disproportionate costs on communities already delivering climate mitigation through carbon sink assets.

The Plan appropriately supports concentrated industrial transition through dedicated funding for the North East and Grangemouth. However, rural and island impacts receive no equivalent place-based investment despite representing structural disadvantage across every sector simultaneously. Our challenges arise from systemic barriers - transport dependency where alternatives do not exist, compound building costs from off-gas-grid heating combined with island fuel poverty, waste ferry export costs, and the energy supply paradox where Argyll and Butehost more than 1 GW renewable capacity yet households face fuel poverty rates nearly 50% higher than the national average.

Just transition for Scotland cannot mean Argyll & Bute siting infrastructure whilst residents see no benefit - neither reduced energy costs nor proportionate economic opportunity. An island household experiences compound burden across multiple dimensions simultaneously - off-gas-grid heat costs, ferry-dependent transport, waste export costs, and constrained housing supply.

Rural climate infrastructure risks compound in ways absent from urban contexts. Landslides, critical infrastructure vulnerability, and weather-related service disruption create adaptation obligations alongside mitigation targets. Regional impact assessments must integrate these compounding factors to capture cumulative disadvantage accurately.

The Council recommend three interventions. First, proportionate place-based investment through a Rural and Island Just Transition Fund calculated using per capita equivalence to North East allocation, adjusted for geographic scale and delivery cost premiums. Second, Regional Just Transition Partnerships with governance powers equivalent to the Grangemouth Future Industry Board, providing strategic coordination. Third, mandatory rural and island impact assessments for all national policies, preventing unintended consequences before implementation.

Educational provision demonstrates extreme regional disparity in transition costs and access impacts. Argyll & Bute operates schools where pupils and staff require daily or weekly ferry travel for educational access, with documented cases of children and staff flown for day provision. While pupil numbers are small from national perspective, equity of access represents non-negotiable statutory duty. Transition policies assuming urban travel alternatives risk undermining educational access where geography permits no alternatives. Adequate funding with adjusted targets reflecting LA-specific and intra-LA geographic contexts must ensure rural and island pupils experience no educational disadvantage from transport decarbonisation timelines designed for urban contexts.

Argyll & Bute seeks investment as enabling infrastructure, not compensatory funding. Our renewable capacity, carbon sink assets, and net-negative status position us to deliver Scotland's climate targets whilst building a resilient rural green economy that ensures host communities benefit equitably from the transition they enable.

SECTION 2: Q5-15 SECTORAL

Q5: What changes, if any, should be made to our policies to support and accelerate decarbonisation of homes and buildings?

Argyll & Bute welcomes strengthened building decarbonisation policy but implementation must differentiate off-gas-grid contexts from urban Scotland to ensure equitable outcomes. The majority of Argyll and Bute properties are reliant on oil, LPG or solid fuel, clean heat transition involves complete energy infrastructure replacement, not equipment upgrades - creating substantially higher costs than mains gas areas whilst often requiring electrical network reinforcement to accommodate new heating loads.

Current policy frameworks inadequately address these whole-system costs. Grant schemes rarely cover full rural installation expenses including thermal improvements and grid upgrades necessary for efficient heat pump operation. Installer scarcity creates service vulnerability, with emergency repairs taking days rather than hours in remote communities. This combination of higher upfront costs and limited service infrastructure creates transition risk for households and businesses currently dependent on reliable heating systems.

Capital funding structures require reform to prevent unintended consequences. Ring-fenced capital for decarbonisation projects often demands unfunded revenue support for long-term maintenance and operation, constraining councils' ability to sustain existing services whilst meeting new climate obligations. Mandatory carbon assessments for major projects exceeding £5 million add analytical burden without corresponding technical capacity funding, potentially delaying critical infrastructure delivery in communities unable to afford postponement.

The Council recommend three reforms. First, enhanced grant support reflecting genuine off-gas-grid installation costs including all necessary enabling works. Second, place-based implementation timescales allowing rural authorities to achieve decarbonisation objectives at pace compatible with local installer capacity and supply chain realities. Third, revenue funding accompanying capital programmes to ensure long-term system viability. The Council supports ambitious building standards but insists policy must enable rural delivery rather than penalise geographic context.

Q6: What changes, if any, should be made to our policies to support widespread deployment of clean heating systems?

Widespread clean heating deployment in rural Scotland requires delivery infrastructure that does not currently exist. The Plan sets ambitious installation targets but does not adequately address how reliable service provision will be established in areas where installer capacity is severely limited, call-out costs are prohibitive, and emergency repairs can take days during winter conditions. Much housing stock in rural and island locations may also struggle to be upgraded to be suitably airtight for heat pumps to be effective. For households currently dependent on oil or LPG, heat pumps represent viable long-term solutions only if they deliver reliable warmth without creating service vulnerability.

Grant structures must reflect realistic rural installation costs. Current schemes may cover equipment but not associated enabling works - electrical network upgrades (sub stations) both internally and to local supplies, thermal envelope improvements, and internal heating system modifications necessary for heat pump efficiency. A household receiving standard grant support may still face total project costs in excess of double the grant value. For rural homeowners, particularly older residents on fixed incomes, this gap is insurmountable regardless of long-term operational savings.

Service infrastructure requires strategic development. Community Planning Partnership proposals for green skills training facilities in Argyll & Bute would create local heat pump installation and maintenance capacity rather than perpetuating dependence on contractors travelling from urban centres at significant cost and delay. Training programmes for existing local engineers with ensuring reasonable response times would build confidence that rural households adopting clean heating systems will receive reliable ongoing support.

The Council recommend policy supporting development of rural service networks, reformed grant schemes addressing whole-system costs, and tariff structures ensuring low-income households do not experience increased energy burden after transitioning from fossil fuels. Clean heating deployment at scale requires confidence that rural communities will not be financially penalised for adopting technologies depending on reliable, affordable electricity supply.

Q7: 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.

Rank	Option	Strategic Rationale
1	3. Reliable infrastructure for vehicles (such as fuel or charging networks)	Blocking issue. Without grid capacity at island ferry terminals, remote depots, and dispersed school sites, you cannot operate EVs regardless of cost. Private sector won't invest in commercially unviable locations. This is your rural infrastructure gap that requires public sector intervention before targets can be met.

2	6. Ensuring an adequate number of trained mechanics available to perform essential maintenance and repairs	Service continuity risk. You explicitly raised this in Q2 - island/remote communities cannot wait days for mainland mechanics. EV breakdown = service failure for schools, waste collection, social care. Directly links to your skills/capacity arguments throughout the response.
3	5. Convenient access to public charging infrastructure	Staff mobility and visiting workforce. Psychologists, quality improvement officers, support staff doing multi-school days across islands need reliable charging at every site. Education workforce transition depends on this. Connects to your Q2/Q3/Q8 comments.
4	7. Access to funding support / low-cost finance	Budget constraint reality. Given your documented budget gaps (£28.6m-£58.4m over 5 years), capital funding for fleet transition is essential. BUT - funding without infrastructure (ranks 1-3) is useless, so this comes after the blockers are resolved.
5	1. Cost of new zero emissions vehicles needs to come down	Market maturation issue. Helpful, but less controllable via Scottish policy. Will happen over time through scale/competition. You need targeted intervention on rural barriers more than waiting for general market price drops.
6	4. Noticeably cheaper running costs (including electricity, maintenance and insurance)	Important but reserved. You've called for electricity price rebalancing (Q5/Q6), but this is primarily UK Government reserved powers. Ranking it lower signals "this matters but isn't in SG's direct control via this Plan."
7	2. Cost of used zero emissions vehicles needs to come down	Lower priority for fleet planning. Used market will mature as new market grows. For council fleet replacement cycles and harsh rural operating conditions, you need new, fit-for-purpose vehicles with warranty/support, not used stock.
Not ranked	8. All of the above	*Do not use* - it's a non-answer that prevents comparison.

Use box	9. Other	Add crucial rural context (see draft text below)

Q8: What changes, if any, should be made to our policies to support and accelerate active and sustainable travel?

Active travel policy must recognise rural context rather than imposing urban frameworks where they cannot deliver. Across 6,909 km² of mountainous terrain, sea lochs, and ferry-dependent islands, walking or cycling is not a viable alternative to driving for journeys between settlements. The Council supports active travel where it represents genuine transport solutions, but policy frameworks designed for Edinburgh or Glasgow cannot simply transfer to rural Scotland without fundamental reframing.

Policy should focus on enabling active travel within communities rather than between them. Supporting safe walking and cycling infrastructure for local journeys to schools, shops, and services would deliver realistic modal shift where geography permits. Investment in foundational infrastructure that urban areas take for granted - footways through settlements, safe crossing points, street lighting, and secure cycle storage - must precede expectations of behaviour change. Many communities lack pavements entirely, forcing pedestrians onto carriageways shared with timber lorries and tourist coaches.

Educational access demonstrates why active travel policy requires geographic differentiation. Many schools and Early Learning Centres are accessible only by car or bus due to distance and safety constraints, with pupils and staff requiring daily or weekly ferry travel for school access in island contexts. School trip provision already faces difficulty accessing buses in remote areas, with electric transition raising operator willingness and cost concerns affecting outdoor learning opportunities central to curriculum delivery. Active travel promotion remains appropriate within school grounds and local communities, but statutory educational access obligations cannot accommodate modal shift targets where geography prevents walking or cycling as viable school transport.

Argyll and Bute's terrain presents significant engineering challenges distinct from urban areas. Our Infrastructure Design team works to ICE Training Scheme standards incorporating PAS 2080 and climate adaptation targets, but must also address landslide vulnerability, critical infrastructure exposure, and the 28 populated islands' access constraints. Active travel infrastructure in this context demands design standards reflecting extreme weather resilience, seasonal maintenance capacity, and diverse user safety on routes shared with heavy goods vehicles and coaches. These are not optional enhancements but baseline requirements for functional rural active travel networks.

Community Planning Partnership proposals for Active Travel Networks connecting villages, harbours, and key destinations with well-maintained paths suitable for year-round use would serve multiple functions - local transport, recreation, health, and tourism. Such infrastructure requires design standards reflecting diverse users and Scottish weather conditions, not urban assumptions about surface treatments and seasonal maintenance.

Engagement with local suppliers for active travel works would reduce transport emissions whilst building local skills capacity, but only if suppliers receive training and confidence that demand will sustain investment in specialist equipment and workforce development.

The Council recommend active travel investment focused on community connectivity rather than arbitrary modal shift targets. Policy must recognise car dependency as structural necessity in rural Scotland whilst supporting active travel infrastructure that enhances community life, health, and local connectivity. Dedicated capital funding should not compete with road maintenance budgets critical to rural accessibility. The Council cautions against active travel policies that penalise car use or create modal shift targets for authorities whose geography makes such outcomes unachievable without fundamentally altering settlement patterns.

Q9: What changes, if any, should be made to our policies to support people to reduce their climate impact in how they travel, use energy, consume food, and live their lifestyles?

Effective policy must recognise that rural households often have limited alternatives to high-carbon behaviours. Car dependency reflects structural necessity, not lifestyle choice - food shopping requires travel to larger towns because communities lack local retail, whilst energy consumption patterns reflect housing stock characteristics and heating system constraints rather than profligate use.

Policy should focus on enabling behaviour change by improving available options rather than promoting aspiration without delivery mechanisms. This means investing in public transport connectivity making car-free travel feasible, supporting local food production and distribution networks reducing the need for long-distance shopping trips, and ensuring low-carbon heating and energy efficiency measures are affordable and accessible to rural households on ordinary incomes.

The Council recommend systemic interventions that make sustainable choices practical - reliable bus services, active travel infrastructure within communities, affordable clean heating options, and local renewable energy schemes allowing residents to benefit economically from decarbonisation. Lifestyle change will follow when sustainable options become accessible and affordable. Policies relying primarily on individual responsibility without addressing structural barriers risk alienating communities managing the practical challenges of rural living whilst contributing less to national emissions than urban centres.

Q10: What changes, if any, should be made to our policies to support Scotland to become a circular economy, with a focus on reducing waste?

The Council recognises circular economy ambitions but emphasises that current statutory instruments create disproportionate burdens for island and remote rural authorities.

The biodegradable municipal waste (BMW) landfill ban came into force on 31 December 2025 - a hard legal deadline that now requires Argyll and Bute to export all island residual waste by ferry at significantly higher cost than mainland authorities transporting to energy-from-waste facilities. Winter ferry disruption presents acute operational risk - if adverse weather prevents waste sailings for extended periods, material accumulates at island transfer stations with no local treatment capacity. This creates immediate environmental health and statutory compliance exposure that mainland authorities do not face.

Extended Producer Responsibility and Deposit Return Scheme policies impose collection, sorting, and storage requirements in communities without infrastructure to support efficient circular systems. Island waste management costs exceed mainland equivalents due to ferry transport, limited treatment options, and dispersed collection geographies.

Effective circular economy policy would benefit from mechanisms that recognise the structural cost differentials between island and mainland waste management systems. Whilst the Council supports circular economy principles - particularly where they create local economic opportunities through reuse networks, repair facilities, and local reprocessing - the financial sustainability of export-dependent systems in island contexts warrants consideration.

Policy development that differentiates statutory targets by geographic delivery costs, integrates rural and island perspectives during design stages, and accounts for the distinction between technical feasibility and financial viability could support more equitable implementation across Scotland's diverse geographies

Q11: What changes, if any, should be made to our policies to support Scotland to sustainably maximise renewable energy to meet our energy and climate needs?

Renewable energy policy must address the fundamental inequity whereby rural and island areas host generation infrastructure but do not receive proportionate economic benefit from the energy produced.

Argyll and Bute hosts substantial wind, hydro, and emerging marine renewable resources - over 1 gigawatts (GW) of installed capacity across 100's of sites, including 16 commercial windfarms. Despite exporting this clean energy, our residents face severe fuel poverty. Our overall fuel poverty rate is significantly higher than the Scottish average of 24%. In some island communities, this reaches an acute 47%. Communities neighbouring renewable developments experience limited employment, persistent fuel poverty, no reduction in electricity costs, and negligible community benefit compared to generating capacity installed.

The Plan states that Scottish Government "continues to encourage developers to offer community benefit and shared ownership opportunities as standard" - but powers to mandate community benefits are reserved to UK Government, and the Good Practice Principles remain voluntary, creating inconsistency across developers. The voluntary approach delivered around £30 million of community benefits across Scotland in the year to February 2025, but there is no enforcement mechanism ensuring equitable distribution or proportionate benefit relative to hosting burden. The Good Practice Principles are under review, with updated guidance due in the latter half of 2026 - but unless this shifts from voluntary to mandatory, rural areas will continue to provide landscape and accept impacts whilst urban centres consume energy and capture economic value.

National grid infrastructure and energy market structures extract value from rural Scotland without ensuring host communities share meaningfully in decarbonisation dividends. Policy should mandate that new renewable developments deliver tangible local benefits. Affordable electricity tariffs for households and businesses in host areas, local ownership stakes generating community wealth, training and employment pathways for residents, and supply chain opportunities for local enterprises would transform renewable deployment from burden into genuine economic development.

Grid connection timescales and charges disadvantage smaller community-scale projects relative to large commercial developments, despite community projects typically delivering stronger local benefit. Policy should reform grid access to prioritise connection of community and local authority renewable schemes, and provide capital support for network reinforcement necessary to accommodate distributed generation in areas where capacity is limited.

The Council recommend embedding Just Transition principles in renewable energy frameworks. Rural communities should not accept industrialisation of landscapes without receiving genuine economic opportunity and energy affordability improvements. Marine energy development around Scotland's coastline offers potential for local supply chain engagement and skilled employment in coastal communities, but only if policy actively shapes projects to maximise local economic participation. Renewable energy policy must drive regional economic development, not widen the gap between energy-producing and energy-consuming areas of Scotland.

Q12: What changes, if any, should be made to our policies to support Scottish industry to competitively decarbonise?

Industrial decarbonisation policy must recognise distinct characteristics of rural economies. Argyll & Bute's economic base includes forestry, agriculture, food processing, and tourism - sectors facing decarbonisation pathways different from heavy industry or manufacturing. Policy should support these primary and service sectors to transition sustainably without imposing compliance costs or administrative burdens that disadvantage smaller rural enterprises relative to large urban-based companies with dedicated sustainability capacity.

Forestry and timber processing require investment in efficient drying technologies and renewable heat systems. Tourism businesses, often small family operations, need accessible guidance and grant support to reduce carbon impacts without bureaucratic complexity. Marine sectors including aquaculture require regulatory frameworks balancing economic activity with environmental protection, ensuring intensification does not compromise marine ecosystem health or water quality.

The Council recommend ensuring industrial support mechanisms are accessible to rural businesses, recognising that application processes designed for large companies may be impenetrable to micro-enterprises. Policy should build on existing business structures and community capacity rather than imposing standardised approaches disconnected from rural economic realities.

Q13: What changes, if any, should be made to our policies to ensure we sustainably use our land and sea, enhance nature, and strengthen resilience against future climate change?

Land and sea use policy must recognise that Argyll & Bute is net-negative for emissions, removing more carbon than the Council's entire operational footprint emits. This status reflects extensive woodland cover, peatland, and coastal blue carbon habitats delivering substantial climate mitigation benefit to Scotland whilst supporting biodiversity, water quality, and landscape character valued by residents and visitors. Policy must protect these existing carbon stores from damaging land use change whilst supporting sustainable economic activity depending on natural resources.

National policies sometimes conflict at local delivery level. Forestry expansion targets, renewable energy development, agricultural improvement, aquaculture expansion, housing land allocation, and conservation designations can all be individually justified but create cumulative pressures on finite land. Without integrated spatial planning explicitly balancing competing objectives, policy implementation risks fragmenting landscapes and undermining ecosystem functions underpinning climate resilience.

Marine planning policy should accelerate sustainable economic activity whilst protecting marine habitats and blue carbon stores such as kelp forests, seagrass beds, and coastal sediments. These ecosystems provide significant carbon sequestration alongside supporting fisheries, water quality, and coastal protection. The Council supports marine renewable energy deployment but insists developments must demonstrate net positive outcomes for biodiversity and ecosystem services, not simply minimise harm.

Climate adaptation policy should resource land managers, communities, and local authorities to build resilience to changing conditions. This includes support for woodland diversification reducing vulnerability to pests and diseases, peatland restoration to reduce flood risk and maintain carbon storage, and coastal management strategies working with natural processes rather than relying solely on engineered defences.

Educational delivery connects directly to nature-based climate action through statutory curriculum requirements. Learning for Sustainability (LfS) forms part of the Scottish Curriculum via the LfS 2030 Action Plan, mandating delivery by all education practitioners with GTCS professional standards integration. School grounds biodiversity work engages staff and young people directly in local nature action planning, creating opportunities for councils to integrate educational establishments into nature restoration monitoring and community engagement. Policy should recognise schools as key delivery partners for biodiversity enhancement and climate education, with funded support for outdoor learning infrastructure and school grounds habitat creation complementing wider nature strategy implementation.

The Council recommend three reforms. First, the 4th Land Use Strategy must provide regional guidance on where woodland, peatland, and renewable activities should be prioritised to minimise conflicts and biodiversity impacts. Second, National Planning Framework policy should protect renewable surplus areas like Argyll & Bute from industrial loads consuming existing generation without equivalent additionality and local benefit, preserving net-negative status as strategic climate asset. Third, blue carbon habitats must be integrated into national greenhouse gas inventory and restoration targets, recognising coastal Scotland's contribution to climate mitigation.

Q14: What changes, if any, should be made to our policies to support woodland expansion and ensure our forests benefit people, nature, and climate change mitigation?

Woodland expansion policy must balance carbon sequestration ambitions with landscape character, biodiversity, and community concerns. Argyll & Bute has experienced significant afforestation over recent decades, with extensive commercial forestry plantations dominating some glen and hillside landscapes. Whilst these forests provide timber supply and carbon storage, large-scale monoculture plantations can reduce habitat diversity, alter water courses, and change visual character of places valued by residents and visitors.

Future woodland expansion should prioritise diverse species composition creating resilient forests supporting biodiversity alongside carbon sequestration. Native woodland expansion, particularly in riparian zones and areas connecting existing fragments, would deliver multiple benefits including habitat restoration, flood management, and water quality improvement. Productive forestry remains important for rural economies, but policy should encourage continuous cover forestry and mixed-species approaches over clearfell monocultures.

Community engagement in woodland expansion decisions is essential. Local knowledge about land capability, historical land use, and landscape character should inform where expansion is appropriate. Community woodland ownership models can ensure local populations benefit economically from woodland assets through sustainable timber harvesting, recreation, and ecosystem service payments.

The Council recommend woodland policy emphasising quality and local benefit over quantitative hectare targets alone. Right tree in right place at right scale, with community engagement shaping expansion decisions, would deliver climate mitigation alongside biodiversity enhancement and rural economic opportunity. Woodland expansion should complement existing land uses rather than displacing viable agricultural enterprises or compromising landscapes of cultural and recreational value.

Q15: What changes, if any, should be made to our policies to support farming and land management to reduce emissions and enhance nature?

Agricultural policy should recognise the distinct characteristics of Scotland's farming systems and avoid applying approaches designed for intensive lowland agriculture to extensively managed upland contexts. Argyll and Bute's predominantly Less Favoured Area farming maintains biodiversity-rich habitats through extensive livestock grazing on upland and coastal pastures, whilst producing food and managing landscapes that function as significant carbon sinks.

Transition policy risks creating disproportionate administrative and financial burdens where regulatory frameworks assume farm-scale operations with dedicated management capacity and ready access to specialist contractors. Small crofts and family farms operating in remote locations face structural disadvantages in complying with obligations designed without adequate consideration of geographic context, digital connectivity, or the capacity constraints affecting small-scale extensive producers.

Effective support would acknowledge that low-intensity land management systems already deliver substantial environmental benefits and may require different pathways to climate objectives than intensive agricultural operations. Policy approaches might consider how advisory capacity, financial mechanisms, and compliance frameworks can be structured to reflect the operational realities of hill farming and extensive grazing systems, where environmental stewardship forms an integral part of existing practice rather than requiring fundamental business model transformation.

Recognising and rewarding the ecosystem services delivered by extensive land management - including carbon storage, biodiversity maintenance, and water quality protection - could provide economic pathways that complement food production in areas where productivity is naturally constrained by climate, topography, and soil characteristics.

SECTION 3: Q16-Q21 IMPACT ASSESSMENTS

Q16: Which groups or communities do you think will be most affected by the transition to net zero, and in what ways?

Groups most affected experience cumulative disadvantage - rural and island households facing compound cost barriers across heat, transport, and essential services whilst communities hosting transition infrastructure receive uneven benefit.

Rural and island communities face disproportionate impacts across multiple dimensions simultaneously. Transport dependencies create vulnerability when statutory targets assume alternatives that do not exist. Ferry-dependent communities face obligations for low-emission vessels by 2032 whilst awaiting grid reinforcement for shore power, creating service risks during transition. Fuel poverty concentrated in these areas (reaching 47%) compounds as transition costs for heat pumps, EV charging infrastructure, and building improvements remain beyond reach without sustained grant support adequate to off-gas-grid realities. Vehicle emission targets assume affordability and charging access that rural geography challenges.

Agricultural and land-based communities face cumulative compliance costs during transition, particularly where regulatory frameworks designed for intensive lowland systems are applied to extensive hill farming contexts already delivering environmental benefits through low-intensity management (see Question 15 response).

Internal service-level insights reinforce this capacity crisis. Customer Support Services submissions identify that councils lack in-house expertise to determine what compliance and future job requirements the transition demands, requiring skills gap analysis as a foundational step before training investment can be strategically targeted. This capacity deficit extends beyond workforce numbers into fundamental knowledge gaps about what net zero delivery actually requires from local government systems.

The Plan's absence of systematic Consumer Impact Assessment represents a significant omission given policies affecting heating, transport, and energy costs. In Argyll and Bute, heating, housing, and travel costs already exceed Scottish averages, particularly across 28 inhabited islands and remote peninsular communities, whilst population ageing and overall decline compound vulnerability to further cost increases. Consumer impact analysis should precede policy implementation, not follow complaints about affordability, particularly for rural and island households experiencing compound cost burdens across multiple essential services simultaneously.

Local authority workforces managing delivery face acute capacity constraints. Expanded statutory obligations - revised climate plan templates, enhanced monitoring, Climate Delivery Framework participation - arrive without matched funding, creating an unfunded mandate pattern where rural authorities with limited teams struggle to meet expanding requirements alongside existing duties.

The Council recommend recognising that whilst job losses concentrate in specific urban sites, cumulative disadvantage concentrates in rural Scotland across every sector simultaneously. Regional Just Transition investment must address this distributed but equally material impact through proportionate place-based funding and differentiated policy implementation acknowledging that rural delivery contexts differ fundamentally from urban Scotland.

Q17: How do you think the Climate Change Plan aligns with existing local, regional, or national priorities that you are aware of or involved in?

The Plan aligns well with statutory climate duties and Argyll & Bute's strategic positioning as Scotland's only net-negative emissions authority. Sectoral pathways support PBCCD reporting, LHEES, and net-zero commitments, with direct alignment between Plan outcomes and published strategies. Emphasis on nature-based solutions aligns with our Local Nature Recovery Strategy, positioning natural capital investment as core economic development opportunity.

However, three significant capacity tensions and delivery barriers constrain implementation. First, statutory obligations arrive without matched funding - revised climate plan templates requiring interactive platforms, enhanced monitoring, and Climate Delivery Framework participation demand significant resource whilst budgets remain constrained. Second, urban-designed policies applied without geographic adjustment create delivery conflicts. Statutory household waste Code of Practice may mandate multi-stream kerbside collections economically unviable across dispersed geographies, whilst recycling performance targets from 2030 risk setting benchmarks unachievable in rural settings. Third, regional funding inequity persists - the North East receives dedicated Just Transition funding whilst rural authorities hosting renewable deployment and managing associated impacts receive no equivalent support despite similar workforce, housing, and service pressures.

Operational delivery concerns extend beyond funding quantum to process dysfunction. Internal submissions emphasise that Scottish Government frequently assigns councils promotional, administrative, and fraud-prevention roles for national schemes without advance consultation, adequate resource allocation, or clarity about expectations. This pattern undermines delivery effectiveness and strains council-community trust when schemes launch without local readiness, with local authorities becoming the visible face of poorly-planned initiatives whilst lacking the tools or resources to deliver effectively.

Early engagement protocols requiring confirmed local authority agreement before public announcement of grants, funds, or initiatives would enable councils to prepare appropriate support infrastructure, train staff, and establish local partnerships, preventing the implementation gaps that currently frustrate businesses and residents seeking support.

The Council recommend three reforms addressing these tensions. First, advance and proportionate funding to enable efficient planning and avoiding ring-fenced capital arriving without revenue support. Second, place-based flexibility in statutory targets accounting for geography - differentiated collection costs, transport targets recognising structural car dependency, and waste performance metrics reflecting rural operating contexts. Third, establishing capacity funding mechanisms ensuring local authorities can deliver expanded obligations rather than struggling under cumulative unfunded mandates.

Q18: 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?

Mitigating negative impacts requires five strategic interventions addressing capacity, flexibility, equity, asset protection, and realistic timelines.

Funding local authority climate capacity must address statutory obligations comprehensively. PBCCD reporting, revised climate plan templates, LHEES delivery, Climate Delivery Framework participation, waste Code of Practice compliance, and bus open data duties require workforce investment proportionate to geographic and statutory burden. A national Climate Officer Capacity Fund would transform delivery feasibility, enabling councils to scale teams managing unfunded mandates effectively rather than struggling with impossible workload expectations.

Skills gap analysis must precede training investment to ensure strategic workforce development aligned with net zero obligations. Internal service submissions emphasise that councils lack in-house expertise to identify what capabilities the transition demands, requiring funded skills assessments before training budgets can be effectively targeted. Without understanding specific competency requirements, workforce development risks becoming scattergun investment in generic training disconnected from operational needs. Funded skills assessments enabling councils to identify competency gaps across climate plan delivery, LHEES implementation, carbon assessment, and nature-based solutions would provide the evidence base for strategic training investment delivering measurable capacity improvement.

Statutory targets and operational frameworks that reflect geographic diversity in delivery contexts could support more equitable outcomes across Scotland's varied waste management landscapes. Where collection costs and operational constraints differ fundamentally between island and urban settings, policy approaches that accommodate evidence-based flexibility may enable compliance without compromising service viability. Transport targets should differentiate areas with viable modal shift alternatives from those where car dependency is structural, recognising that achieving outcomes requires different approaches in different settings.

Regional funding equity requires establishing a Rural and Island Just Transition Fund calculated using per capita equivalence to North East allocation (£500 million), adjusted for delivery cost premiums. Current funding creates unjustifiable regional inequity - rural authorities face fuel poverty, transport affordability, and infrastructure deficits equivalent to North East challenges, compounded by higher delivery costs. A dedicated fund addressing EV charging gaps, ferry electrification, heat network viability, and peatland/forestry workforce development would enable delivery the Plan assumes possible.

Protecting strategic climate assets must preserve renewable surplus areas. National Planning Framework policy should protect net-negative authorities from industrial loads consuming existing renewable generation without equivalent local benefit, preserving decades of investment in forestry, peatland, and renewable infrastructure that created this strategic climate contribution.

Realistic timelines with transition support for cost-intensive mandates must extend compliance deadlines and create transition funds enabling staged investment for rural and island operators facing precision agricultural equipment requirements, bus fleet electrification, and Whole Farm Plan obligations during constrained budgets.

These interventions would enable rural Scotland to deliver ambitious climate objectives sustainably rather than experiencing policy implementation as cumulative burden undermining service viability and community resilience.

Q19: Are there any potential positive impacts that have not been mentioned that you think are important to consider?

Potential positive impacts are addressed through responses to other consultation questions, particularly opportunities arising from nature-based solutions, renewable energy development, and circular economy transitions where appropriate support mechanisms enable rural communities to capture economic benefits rather than simply bearing transition costs.

Q20: Are there any further comments you wish to make on the Island Communities Impact Assessment?

The Island Communities Impact Assessment appropriately identifies challenges but requires strengthening in three areas. First, cumulative impact assessment across multiple policies simultaneously affecting island communities - individually manageable policies become collectively overwhelming when implemented concurrently without coordination or phasing. Second, cost quantification of island-specific burdens such as ferry export requirements for waste, remote installer premiums for heat installations, and grid reinforcement costs for transport electrification. Third, mitigation mechanisms ensuring identified negative impacts receive funded solutions rather than remaining documented concerns without policy responses addressing the structural disadvantages identified.

Q21: 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?

Further impact concerns identified through this consultation response are comprehensively addressed in responses to other consultation questions. The cumulative effect of policies represents the most significant impact requiring attention - the assessment approach evaluating individual policies separately may underestimate the compound burden on rural authorities, households, and businesses managing multiple transitions simultaneously across heat, transport, waste, agriculture, and energy systems without coordinated phasing or integrated support mechanisms.

SECTION 4: Q22-Q25 STRATEGIC ENVIRONMENTAL ASSESSMENT

Q22: 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?

The baseline requires strengthening in three areas: blue carbon habitats, cumulative renewable infrastructure pressures, and rural land management systems.

Blue carbon habitat data remains insufficient despite Plan acknowledgment of evidence gaps. Scottish Blue Carbon Forum research and NatureScot Marine Protected Area assessments document distribution across sea lochs and estuaries but aren't integrated. Argyll & Bute hosts internationally significant blue carbon habitats across 23 sea lochs. The baseline's terrestrial bias underrepresents marine assets critical to climate mitigation and coastal adaptation.

Cumulative renewable infrastructure effects lack adequate spatial baseline. Current data doesn't map existing footprints against designated nature sites at sufficient resolution. Argyll & Bute hosts extensive wind, marine renewables, and hydro alongside numerous biodiversity sites. Spatial cumulative pressure mapping by local authority area would enable place-specific assessment rather than national averages masking regional concentration.

Rural agricultural systems appear under-represented in the baseline assessment. The extent to which extensively managed upland systems - characterised by organic-rich soils and low-intensity grazing - differ from intensive lowland arable contexts may warrant consideration to ensure Strategic Environmental Assessment reflects geographic variation across Scotland's diverse farming landscapes (see Question 15).

The Council recommend integrating Scottish Blue Carbon Forum research, developing spatial cumulative pressure mapping by local authority area, and stratifying agricultural baseline by farming intensity. Publishing disaggregated data would enable Strategic Environmental Assessment to reflect geographic variation.

Q23: What in your view are the most significant environmental effects which should be taken into account as the Draft Climate Change Plan is finalised?

Three effects require managing: cumulative land use competition, marine space pressures, and sequencing risk undermining biodiversity recovery.

Cumulative land use pressures from woodland, peatland, and renewable targets create habitat fragmentation and compete with low-intensity agriculture supporting high nature value. These are essential climate measures, but their cumulative spatial footprint requires strategic frameworks preventing conflicts. Scotland's 4th Land Use Strategy must provide regional guidance on where activities should be prioritised to minimise biodiversity impacts. In Argyll & Bute, restoration potential, renewable development pressure, and designated habitats overlap across the same landscape.

Marine effects from offshore wind, aquaculture, and fisheries create pressures on seabirds, marine mammals, and benthic habitats that compensation may not offset. The National Marine Plan must spatially manage these whilst protecting Marine Protected Areas.

Sequencing risk emerges if renewable consenting conflicts with halting biodiversity loss by 2030. The Plan states net zero and nature must support each other but lacks binding mechanisms preventing trade-offs favouring energy over ecology.

The Council recommend the 4th Land Use Strategy provide binding regional guidance, National Marine Plan spatial protection, and mandatory mitigation hierarchy for renewables with transparent public reporting.

Q24: What are your views on the predicted environmental effects as set out in the environmental report? Please share any other useful sources.

Predicted effects require greater transparency about uncertainties, geographic distribution, and trade-offs.

Predicted positive effects from nature-based solutions are credible but geographically concentrated in rural Scotland. Benefits should be disaggregated geographically to demonstrate how environmental improvements distribute rather than assume uniform national outcomes. Communities hosting restoration should visibly receive improvements proportionate to contribution.

Predicted renewable effects underestimate cumulative impacts on designated sites. Recent evidence reviews document significant pressures on protected bird sites from disturbance, displacement, and collision mortality. Marine renewables impact seabird foraging and marine mammal habitats. The prediction that compensation offsets these impacts requires transparent evidence, particularly for irreplaceable habitats and internationally protected species.

Predicted agricultural effects remain ambiguous. The Plan predicts reform delivers climate mitigation alongside biodiversity and productivity, but evidence supporting simultaneous achievement is limited. Predictions should clarify which policies deliver measurable biodiversity enhancement versus neutral or negative effects.

The Council recommend geographic disaggregation by local authority area, transparent acknowledgment of uncertainties and trade-offs, and quantification of agricultural biodiversity outcomes using measurable indicators.

Q25: What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

Mitigation and monitoring require four enhancements: binding enforcement, transparent governance, biodiversity integration, and alignment with local authority reporting..

The mitigation hierarchy - avoid, minimise, restore, offset - should be mandatory for renewable developments through strengthened planning policy. For Argyll & Bute, hosting extensive renewables and designated sites, transparent mitigation with public reporting is essential to maintain confidence environmental protections remain robust during accelerated deployment.

Strategic compensation for offshore wind requires governance frameworks answering: who identifies sites, how is additionality ensured, how are funds allocated geographically? Establishing governed compensation funds with criteria prioritising areas experiencing cumulative pressures would ensure fairness.

Biodiversity monitoring must accompany carbon monitoring. Restoration projects should require biodiversity monitoring using standardised protocols with publicly accessible data. Just transition indicators tracking nature site condition should report by local authority area, enabling place-based accountability.

Alignment with existing PBCCD reporting prevents duplication. Scottish Government should integrate monitoring into existing frameworks rather than creating parallel obligations.

The Council recommend mandatory mitigation hierarchy, transparent compensation governance, biodiversity monitoring requirements, and integration with PBCCD reporting.

SECTION 5: Q26-28 EMISSIONS MONITORING FINAL ANSWERS

Q26: 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?

The two-track approach combining greenhouse gas inventory monitoring with timely indicators is methodologically sound and addresses the three-year data lag inherent to emissions reporting. However, effective implementation depends on resolving three strategic challenges: funding local authority capacity to deliver area-based reporting, ensuring public accessibility through active communication rather than passive data publication, and preventing duplication by aligning monitoring frameworks with existing statutory obligations.

Area-based reporting must be resourced, not mandated unfunded. The Plan commits to area-based reporting following Environmental Standards Scotland recommendations but provides no implementation funding. Argyll & Bute operates with one climate officer across 6,909 square kilometres managing multiple statutory duties. Expanded reporting obligations - interactive platforms, Climate Delivery Framework participation, enhanced just transition indicators - represent recurring costs with no identified funding. This creates an equity gap where resource-constrained rural authorities cannot participate meaningfully in national monitoring architecture regardless of capability. The Scottish Government must fund climate officer capacity proportionate to monitoring expectations or accept that area-based reporting becomes another unfunded mandate delivering partial geographic coverage.

Public understanding requires the Scottish Climate Intelligence Service to translate technical emissions data into accessible local narratives. Publishing $MtCO_2e$ datasets will not engage communities. Annual local authority fact sheets using tangible metrics - homes heated cleanly, renewable capacity added, journeys electrified - would enable councils to communicate progress locally and demonstrate how national targets connect to place-based delivery.

Integration with Public Bodies Climate Change Duties reporting prevents duplication. Local authorities already report emissions across sectors under statutory obligations. Providing standardised datasets and templates satisfying both carbon budget monitoring and local authority statutory duties simultaneously avoids inefficient parallel data compilation using stretched capacity.

Q27: 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?

Sub-sectoral emissions reporting is essential for accountability and policy refinement, transforming aggregate national figures into actionable intelligence for local authorities, businesses, and communities. However, utility depends on three factors: transparent data quality indicators acknowledging measurement uncertainty, accessible tiered communication for different audiences, and geographic disaggregation revealing whether rural and island Scotland is decarbonising at comparable rates to urban areas.

Disaggregating transport into cars, heavy goods vehicles, buses, and ferries rather than reporting aggregated totals enables evidence-based assessment of which interventions deliver results and which require intensification. Similarly, disaggregating domestic heating by fuel type reveals whether off-gas-grid properties reliant on oil and liquefied petroleum gas are transitioning at comparable rates to gas-grid properties - critical for evaluating whether rural heat transition policies address the structural disadvantage facing most Argyll & Bute households.

Data quality transparency is essential. Land use, forestry, and peatland emissions rely on modelling with significant uncertainty. For Argyll & Bute, where natural capital creates net-negative per capita emissions, understanding confidence intervals is as important as headline figures. Without published uncertainty ranges, users cannot distinguish genuine emissions shifts from statistical variance within measurement error.

Accessibility determines whether sub-sectoral detail supports understanding or overwhelms audiences. Effective communication requires tiered disclosure: executive summaries for elected members and communities, practitioner breakdowns for local authority climate planning, and full technical datasets for specialist analysis. Sub-sectoral data supports local climate governance by enabling councils to justify resource prioritisation and demonstrate intervention impacts, strengthening democratic accountability.

Q28: 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?

Timely indicators are essential for responsive climate governance, enabling early-warning intervention years before lagged emissions data confirms trajectory deviations. They translate abstract carbon budgets into tangible delivery metrics businesses, communities, and individuals can understand whilst revealing whether place-based delivery challenges disproportionately affect rural and island Scotland.

Real-time tracking of observable delivery metrics - electric vehicle registrations, heat pump installations, woodland hectares created - identifies when annual uptake falls below carbon budget requirements, enabling immediate policy intensification rather than retrospective discovery through lagged data. This responsiveness is fundamental for local authorities managing infrastructure delivery within constrained timescales.

Dashboard visualisation with traffic-light status ratings provides accessible accountability tools for non-specialist audiences including elected members, journalists, and community groups. Visual summaries showing which sectors are on track, at risk, or off track enable rapid assessment of where Scottish Government delivery succeeds and where intervention is needed.

Geographic disaggregation is critical for equity monitoring. National indicators may suggest satisfactory progress whilst masking persistent rural and island delivery gaps. The Council recommend dashboards include a Rural Premium indicator tracking whether higher costs of installing infrastructure in remote areas are being neutralised by targeted funding. Without rural-specific metrics, national averages obscure whether decarbonisation is a just transition or an urban transition leaving rural Scotland behind. Timely indicators published transparently enable public, parliamentary, and media scrutiny, strengthening climate governance through democratic accountability.

SECTION 6: Q29-33 JUST TRANSITION MONITORING FINAL ANSWERS

Q29: 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.

The 14 proposed indicators represent progress, but several gaps undermine accountability for rural and island impacts. Indicator 1.1 measures satisfaction but not whether participatory infrastructure exists - add objective metrics like local authorities operating public Climate Change Boards and LHEES achieving geographic representation from island communities. Indicators 2.1 and 2.2 miss combined energy-transport poverty affecting rural households spending minimal income on domestic fuel but substantial amounts on essential vehicle travel. Indicator 2.3 focuses on oil and gas decline but excludes areas like Argyll & Bute capturing green economy opportunities through decommissioning and offshore wind supply chains.

The Community Planning Partnership's Community Wealth Building framework demonstrates partnership-led monitoring through live indicators for economic inclusion and fair employment. Indicator 3.2 tracks green job numbers but not quality - negotiate with ONS to include wage, contract, and unionisation data revealing whether jobs deliver Fair Work First principles.

A new indicator tracking council climate officer capacity per population would address a critical gap. Nothing currently monitors whether local authorities have resource to deliver expanded statutory obligations under the Climate Delivery Framework.

Q30: 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.

Meaningful participation requires both process quality and outcome influence. Indicator 1.1 measures satisfaction but the Plan acknowledges this won't provide "the impact of that participation on the decision-making process" - the critical gap.

Process indicators should track consultation reach across all local authority areas, demographic representativeness against Scottish population, and timing relative to decisions. Outcome indicators should track visible changes - percentage of consultations resulting in published explanations of what changed, LHEES revised following public input, and planning applications modified following community feedback. Without outcome tracking, participation becomes consultation theatre.

Local authority climate governance should be monitored through councils operating public Climate Change Boards, publishing papers in advance, and live-streaming meetings. Argyll & Bute operates with public attendance but this isn't universal. Existing consultation platforms and Planning Authority data enable tracking without new burdens.

Internal submissions reinforce the need for established frameworks rather than new metrics. Customer Support Services emphasise that existing measures for assessing meaningful Scottish Government public participation should be used, specifically the Scottish Approach to Service Design and National Standards of Community Engagement. This leverages proven frameworks rather than creating parallel monitoring systems.

Local authority operational insights suggest using councils' wealth of local expertise and data segmentation to identify and promote engagement with relevant communities by geography, culture, and demographics. Measuring local democratic activity around just transition, climate change, and biodiversity with focus on decision-making, action-tracking, and funding allocation would provide richer participation assessment than relying solely on Climate Change and Household Surveys. Local authority promotion of these surveys would improve response rates and enhance data credibility.

Q31: 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.

Multi-dimensional indicators are needed capturing economic, social, and environmental impacts in host communities.

Track Community Benefit value per affected resident in postcode sectors hosting developments, not just national averages. For Argyll & Bute hosting significant wind capacity, this reveals whether communities capture value from infrastructure they host. Monitor local employment percentages and procurement during construction and operation. Track pre-application consultation quality through Planning Authority data - percentage conducted before submission and applications modified following feedback.

Submissions emphasise that developer accountability represents the critical monitoring requirement.

Current monitoring relies heavily on Climate Change survey responses, but broader review of public engagement events and activities from local authorities and organisations implementing transition projects would provide better ground-level understanding. Technology-enabled tracking rather than labour-intensive reporting returns would enable this without increasing council administrative burden.

Environmental indicators should track biodiversity net gain delivered within host local authority areas rather than offset elsewhere, and mitigation of landscape impacts.

Argyll & Bute generates net-negative per capita emissions whilst hosting extensive renewable infrastructure contributing to national decarbonisation. Without indicators demonstrating local economic benefit, support for further development risks erosion. A just transition cannot come at the price of host areas bearing infrastructure burdens whilst seeing limited benefit.

Q32: 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?

Monitoring requires tracking whether alternative employment provides comparable job quality, utilises transferable skills, and maintains financial stability.

Indicator 3.1 tracks training uptake but the Plan acknowledges this won't tell whether training "enabled workers to go on to secure a high quality job in the renewable and sustainable energy sector". Work with Skills Development Scotland to conduct longitudinal surveys tracking employment rates, sector destination, skills utilisation, and salary comparison within 12 months of training completion.

Use Annual Population Survey data to track contract types and employment retention at 24 months, distinguishing sustainable transitions from precarious work. Monitor wage changes and household financial wellbeing. Track sector mobility showing whether oil and gas skills transfer to offshore wind, marine energy, and hydrogen sectors. Monitor geographic retention for Aberdeen, Aberdeenshire, Shetland, and Orkney - whether workers transition locally or require relocation.

Q33: 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?

Monitoring requires distinguishing direct policy effects from wider climate change impacts.

Indicators 4.2 and 4.3 track hectares but not ecological outcomes. Supplement with condition monitoring - percentage of restored peatland achieving "actively growing" status within five years and woodland achieving "satisfactory" condition within ten years.

Disaggregate Indicator 4.1 air pollution by local authority with population exposure above WHO guidelines and premature deaths attributed to pollution, demonstrating local health benefits. Require species-specific monitoring through developers' post-construction obligations - raptor collisions, fish pass effectiveness, marine mammal disturbance.

Track freshwater ecological status through SEPA monitoring, broken down by pressure type. Ensure biodiversity net gain is spatially explicit - delivered within host local authority areas rather than offset elsewhere.

Continue funding phenology and species distribution programmes like UK Environmental Change Network, distinguishing climate-driven changes from transition policy impacts.