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Dear Environment, Climate Change and Land Reform Committee

### **Scottish Government's draft Climate Change Plan (third Report on Proposals and Policies – RPP3) Call for views**

Thank you for seeking our views on the Scottish Government draft Climate Change Plan (third Report on Proposals and Policies – RPP3). I offer views on behalf of Historic Environment Scotland, the lead public body established to investigate, care for and promote Scotland's historic environment. This response is also intended for consideration by the other Parliamentary Committees.

Amongst our varied roles and responsibilities as lead public body for the historic environment, we are identified as a 'major player' in the Climate Change (Scotland) Act 2009. We carry out our duties in respect of this by implementing our Climate Change Action Plan 2012–2017 and to support this we carry out a range of activities such as research into energy efficiency improvements in a range of traditional building types and the impact of climate change and risks to the historic environment; including dissemination of information, guidance and training to stakeholders in the historic environment sector.

We also provide advice on the potential impacts of development on the historic environment to fulfil our role as a statutory consultee in the planning system and as a consultation body under the Environmental Impact Assessment regulations.

We have provided comments in relation to some of the areas highlighted by the Committees and would be happy to provide further information in support of these, or related matters if this would be considered helpful. Historic Environment Scotland will be submitting a full response to RPP3 and its accompanying Strategic Environmental Assessment Environmental Report by the stated deadline of 20 March 2017.

### **Progress to date in cutting emissions and implementing the proposals set out in RPP2**

Historic Scotland's Carbon Management Plan 2010-2015 resulted in a 17% carbon reduction across our estate (as at FY 2015/16) stemming from a range of actions including

energy efficiency measures and fabric interventions, installation of smart meters, staff training etc. RPP2 states that Historic Scotland is undertaking research and dissemination of guidance into energy efficiency improvements to a range of traditional building types.

Since 2012 we have produced 23 Refurbishment Case Studies and 9 Technical papers (available online at [www.historicenvironment.scot](http://www.historicenvironment.scot)), most of which document energy efficiency upgrades through fabric improvements to a range of domestic and non-domestic traditional building types across Scotland.

We have also published guidance through our Short Guide series, including '*Fabric Improvements for Energy Efficiency in Traditional Buildings*' (2013); '*Micro-renewables in the Historic Environment*' (2014), '*Climate Change Adaptation for Traditional Buildings*' (2016). A training programme has also been developed, focussed on up-skilling a range of stakeholders including building trades and professionals (including EST Home Energy Advisors) and through homeowner events in conjunction with Home Energy Scotland; this includes development and delivery of a formal SQA award in Energy Efficiency Measures for Traditional Buildings.

### Scale of reductions proposed and appropriateness and effectiveness of the proposals and policies within the draft RPP3

Whilst we welcome the overall ambition of the transformational outcomes set out in the draft RPP3, it is not clear how some of the ambitious targets set out in the draft plan are to be achieved and we consider that this would benefit from greater clarity. For example, under the services chapter, figure 16 on page 91 shows a 2-step reduction. The reduction after 2025 is reliant on new technologies and/or the move away from gas space/water heating and this is discussed. What is more pressing is the very large (approximately 40%) reduction required between now and 2021 which we assume must rely largely on energy efficiency. How this is to be achieved in reality over the next 4 years is unclear especially since progress to date has been slow (only 7% since the 2009 Act); and given there is a need to establish a baseline for the sector (10.1.3).

In general, there is a lack of clarity around some of the stated ambition for policies and proposals for the residential and service sectors. These aspects of the draft plan seek to improve the fabric of existing buildings to increase energy efficiency. A more nuanced approach should be taken in respect of such interventions, particularly for traditional buildings. The link between improving the appearance of the built environment and regeneration and other benefits would benefit from some clarification in the final report. Furthermore, seeking to alter the appearance of listed buildings, buildings within Conservation Areas and other types of traditional buildings may harm their special interest. In light of that it is important to seek options for improving energy efficiency without detriment to the historic environment. It is also worth noting that nearly half of controlled waste comes from the construction and demolition industries. The retention or reuse of historic building stock and reuse of salvaged materials can make a significant contribution to the circular economy and waste reduction.



We note that there is the potential for proposals falling from the plan as it relates to the electricity sector to impact on the historic environment as a result of their construction, operation and potentially their decommissioning. We welcome recognition of this in the draft RPP3 and recognition of the role of the planning system in addressing the potential for adverse impacts. However, there are other sectors which do not fall within the remit of the planning system (e.g. forestry and land-use). Proposals or projects resulting from policies in draft RPP3 for these sectors may also have an impact on the historic environment. It will be important for the final plan to recognise that such impacts arising from other sectors including forestry and land use will also require to be addressed as part of relevant decision-making processes including Environmental Impact Assessment.

### **The extent to which the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits from specific interventions in particular sectors**

We note that in chapter 3 the Scottish Government has set out the role of local government in tackling climate change, however the wider public sector including Non-Departmental Public Bodies such as Historic Environment Scotland gets little mention. The inset box on mandatory reporting says very little about the role of the wider public sector other than reporting to Scottish Ministers on their compliance with climate change duties.

Under the Public Bodies Climate Change Duties as set out in Part 4 of the Climate Change (Scotland) Act 2009 the wider public sector is mandated to deliver government policies on climate change, both in terms of managing their own estates and through their wider operations. We suggest this might be reflected in the draft Plan, particularly as the role of the wider public sector is implicit in many parts of the reduction targets (e.g. the Services Sector).

Given that RPP2 states “By 2027 we will have witnessed a complete transformation in the way Scottish public bodies work and in how their estates are managed”, it would be helpful to have clarity on this issue, so that organisations such as HES can make a full and appropriate contribution to supporting the Scottish Government’s Climate Change Plan.

Yours sincerely,

**ALEX PATERSON**