



DRAFT 2030 CLIMATE STRATEGY

Commission feedback on The City of Edinburgh strategy

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THE UNIVERSITY
of EDINBURGH



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Contents

Introduction	2
Our Response	2
Key Recommendations	2
Net Zero, Climate Resilient Development and Growth	4
Net Zero Energy Generation and Energy Efficient Buildings	5
Net zero emission transport	5
Business and skills in a net zero economy	6
Engaging and empowering citizens to help tackle climate change	7
Investing in change	8
Offsetting	9
Implementation.....	9

Introduction

This document outlines the Edinburgh Climate Commission's response to the draft [2030 Climate Strategy](#) published by The City of Edinburgh Council in June 2021. The response is set out under chapter headings corresponding to those found in the draft strategy.

The whole strategy has been considered by Commissioners. Individuals with expertise in particular areas have paid the most attention to their area(s) of specialism and, where resources have been available, have undertaken further exploration of issues. Particular comment has been generated in areas where Commissioners felt further opportunities could be realised. As such there is not equal comment across all areas of the strategy.

The Commission will continue to explore issues across the strategy in its work and will use the insights generated to further challenge the Council.

Our Response

Edinburgh Climate Commission is aligned with the vision set out in the draft 2030 Climate Strategy. Furthermore, the Commission welcomes the recognition and acknowledgement of the Council's important leadership role in addressing City emissions. The strategy targets the right areas of action and sets the right foundations for future action.

Key Recommendations

This document makes a number of detailed recommendations and key themes and overarching areas for improvement are outlined below.

Urgency

The Commission feels strongly that the strategy does not resonate as an emergency response that fully reflects the climate emergency. It lacks the sense of urgency found in Edinburgh's response and recovery from the covid pandemic. We expect the Council to use more committal language in the final iteration the Strategy and subsequent in the subsequent Implementation Plan.

Climate Change is the biggest threat to global health of the 21st Century, the Commission would therefore also request that the strategy includes a stronger statement about the threat to health of climate change and the converse of this, the benefits for health and health inequalities of tackling climate change within the strategy.

Governance

The strategy needs to be clearer on how its governance arrangements will drive the delivery of proposed actions and result in strong leadership and action in the City.

The Commission is keen to ensure that whichever governance pathway is decided, it must be brought into, and supported by, all Council leaders. This is to ensure change in Edinburgh is delivered swiftly and with an appropriate sense of urgency.

The strategy and its implementation should realise a '*net zero test*' for all policy decisions made by the Council. The final strategy should demonstrate how the fast-track decision

making processes applied during covid will be applied to future work, to ensure the City can achieve net zero by 2030. This will be critical to its success.

New processes will need to be implemented to enable faster decision making, including the requirement for decisions to be devolved to the appropriate level to mandate action.

These processes do not just relate to cross-Edinburgh partnerships but also, critically, to how the Council will organise itself in order to ensure alignment across departments and have the capacity to move projects forward at far greater pace, as was demonstrated in the response to the pandemic.

The final strategy also needs to outline how it will enable significant City organisations to align their plans, decisions, budgets and actions with the emergency and the 2030 target.

A key example of the need for urgency and a focus on governance is around the role of the construction industry in delivering Net Zero. This industry must be an early adopter of net zero activity. Actions across this industry need to be implemented within the next 5 years for the Council to be on target for a net zero 2030. For instance, while new Scottish legislation will come into force in 2024 enforcing low-emissions standards for new builds, developers will technically be able to produce buildings using the old standards for much longer than this. The Commission would like to see more on how local and national government plan to encourage and incentivise early adoption across the construction industry in Edinburgh in order to prevent a situation where homes built in 2027 are still only meeting standards required today.

Achieving Outcomes and Identifying Contributions

The Commission strongly supports the outcomes-focused approach outlined in the strategy, which powerfully demonstrates what Edinburgh will look like when it has met its net zero targets.

The Commission recognises that outcomes are by their nature broad, with complex and inter-related factors influencing them. As a result, identifying the contribution of any particular organisation or activities to them is complex and multifaceted.

However, the final strategy must articulate more clearly how its actions link to its outcomes and be clearer as to if these actions alone are sufficient to meet net zero by 2030. The strategy must also highlight where there are risks, assumptions and gaps in activity that may affect the realisation of these outcomes.

By doing so, it will help to more clearly demonstrate the level of influence and control the Council and other stakeholders have in achieving the desired outcomes. This will be vital in ensuring that key players can identify how to best make their contribution to achieving a net zero city and where the gaps for additional action need to be addressed.

For the final strategy to achieve this, it needs to describe and name the '*City Partners*' central to achieving its outcomes and clearly outline the asks and responsibilities required of them. This is not always clear throughout the strategy. These partners need to be able to recognise themselves as part of this strategy, understand that they have to act and receive a clear signal on what they must do.

Engagement

The strategy and its implementation must go further and be more creative in terms of its engagement with citizens, businesses, communities and '*partners*'. This will help it resonate more clearly with all stakeholders across the city.

The unique characteristics and diversity of Edinburgh, its citizens, businesses and culture needs to be better reflected in the strategy to ensure that it resonates with all involved in the City. Further, more should be done to demonstrate how citizens will be engaged with deliberative processes around climate actions. This engagement must go beyond one-way communication and focus on a dialogue with the public.

There are several best practice examples of this work happening elsewhere, such as national citizen assemblies and citizen's juries. While the Commission does not expect exact duplication of these examples, it's important for the strategy to provide a clearer picture of what deliberative process will happen in the capital.

Engagement must also focus on different citizen groups, with actions publicised and communicated in a way that is relevant to each group, using the channels, networks, contacts and trusted sources that target audiences are most familiar with.

Engagement must focus on how Edinburgh will change and the benefits and opportunities this will bring and connect people and organisations with actions that are directly relevant to them.

For example, making connections to education, jobs and skills are key topics that will engage young people. Communities may need a focus on social inclusion and a just transition, local services and green spaces to realise the benefits of the coming changes. Meanwhile businesses need to be connected to key market opportunities and investment.

Net Zero, Climate Resilient Development and Growth

Our economy is interlinked across its different sectors and therefore concerted action is essential. The strategy needs to ensure alignment, or address in some other way, the differential planning horizons between national and local government.

Ambiguity around these various timelines implies that Edinburgh's target is prospectively reliant on measures out with its control, such as national policy, regulatory and taxation framework, funding packages and incentives.

The Commission recognises the limited powers of councils to penalise high emissions actions. We also welcome the inclusion of incentives around localising supply chains and promoting consumer power to help encourage citizens to make more sustainable and environmentally friendly choices.

It's important the final strategy builds upon the argument of conditionality described in the [ECC report: Forward, Faster, Together: Recommendations for a Green Economic Recovery in Edinburgh](#), which was fully incorporated in the Council's recovery plan. This principle of conditionality stresses that any public stimulus or investment should be only undertaken based on an assessment of carbon impact. This should be illustrated in the final strategy and then set out in full in the Implementation Plan. The principle of conditionality is also to be found in the cooperation agreement that forms the basis of the partnership between the Scottish Government and the Green Party.

The Commission is particularly pleased to see *'the city centre will be re-imagined as a place for people walking, cycling and wheeling, with excellent public transport accessibility and with the needs of the most vulnerable fully catered for'*. This resonates with the consensus detected in our engagement with young people and is reflected in the ambition set out in [Scotland's Climate Assembly](#) and the [Children's Parliament](#) call to action.

Net Zero Energy Generation and Energy Efficient Buildings

For work outlined in this section to be effective the Commission recognises that early action is required from the Scottish and UK Governments. The strategy must address this challenge and make explicit how and in which key areas the Council will engage and influence national governments around the following issues:

- Providing the appropriate Policy & Regulatory Frameworks, such as a heat standard.
- Accelerating the introduction of government incentives to decarbonise the home & in business.
- Accelerate early private sector change and investment, e.g. developing programmes to demonstrate proof of concept to develop new products in advance of changes in the building regulations.
- Intervene in the finance and valuation sectors to promote low carbon housing retrofit and build.

However, there is much that the Council can do directly. The Strategy must go further and describe how the Council will ensure there is policy alignment (i.e. no barriers) between emerging building regulation and in the development of planning policy in the City. A clear and effective governance structure should be put in place that will include a core cross sectoral delivery group and/or vehicle. The Council could also accelerate and expand the delivery of practical demonstrations of product, systems and methods to retrofit the existing housing stock.

The Commission also recommends that Council capitalise on opportunities for greater community action and involvement presented by district heating systems. There are powerful opportunities to be leveraged from such a move, such as addressing fuel poverty and mobilising innovative models for sustainable community investment.

The Commission's engagement with youth organisations, highlighted this area of the strategy as of particular concern to young people and others in the rental sector, who are subject to inefficient buildings and associated expense and discomfort.

Net zero emission transport

The vision for an expanded, integrated, zero emissions transport system outlined for Edinburgh in the draft strategy is welcomed by the Commission.

We recommend that this section of the strategy explains more about the links between measures to reduce carbon emissions and addressing the wellbeing of all our communities; especially the third of households with no access to their own car. It should highlight that in our most disadvantaged communities this figure increases to half of all households and the challenge for the Council is to prioritise a means to move around the city that everyone can access. The triple win of creating a city where people don't need to own a car needs to be

more explicit, referencing the co-benefits for those disadvantaged communities and for all individual's physical and mental health. We recommend the strategy be more explicit that decisions to prioritise private car transport have a detrimental impact on all our communities as children and the elderly are also disadvantaged.

The final strategy also needs to draw upon existing examples of best practice in Edinburgh where personalised and interconnected transport systems have been established. For example, the [Space & Broomhouse Hub](#) urban development trust is developing an electric fleet to support their community, staff and their social enterprises. This includes e-bikes, a cargo bike, and an electric van. They aim to hire e-bikes to local people in the future, as well as helping staff reach folk in the south west community of Edinburgh. Projects such as these can help ensure citizens have access to personalised and interconnected transport choices. The Commission welcomes the opportunity presented by the strategy to learn from and develop projects such as this for city-wide application.

We welcome the identified challenge to establish sustainable travel as people's preferred travel choice and to reduce the total number of miles travelled. We recommend a clear message be included about the inappropriateness of private car dominated development such as 'drive-throughs' in meeting this challenge.

This section of the final strategy needs to be stronger and bolder on the topic of engagement. There are significant co-benefits to a transition to net zero emissions transport, but the draft strategy limits specific engagement actions in this section to a public consultation on a workplace parking levy. The final strategy needs to have specific headline activities around communicating the benefits of sustainable transport in Edinburgh, of 20-minute neighbourhoods and low traffic neighbourhoods. These are actions which will be immediate and highly visible to citizens and present an opportunity for a net zero lifestyle to be embedded into the culture and identity of Edinburgh and its citizens. The Council can and should publicly and prominently champion this vision. We recommend a more urgent approach that consults communities on how they wish to see their low traffic neighbourhood delivered rather than asking whether or not they want one. An approach that reflect the urgent need for action.

The Commission supports the work to continue and integrate '*Spaces For People*' into workable permanent fixtures within Edinburgh and this programme should be accelerated where possible. We concur with the views expressed in the open letter to the Council from Edinburgh doctors and health professionals that evidence the benefits of safe active travel to reduce inequalities in the health of the population.

Business and skills in a net zero economy

The Commission has been engaged in the rapid scoping of the green skills needed to deliver the final 2030 Climate Strategy and four areas of focus have emerged for targeted action:

1. Develop city-wide climate literacy (e.g. Manchester and Bristol).
2. Target place-based sectors or challenges (such as in Milan with food systems and Wellington with resilience and adaptation).
3. Just transition response to sector and labour market changes (such as in Aberdeen).
4. Align city skills systems to city-wide climate strategy.

A key focus of this work is around balancing needs, between technical skill needs and skills in engaging, scaling and delivering change. To support the four city approaches, a series of city and region specific engagements and technical work are recommended to be progressed.

Firstly, there needs to be greater clarity on the theory of change driving the link between the outcomes of an inclusive net zero economy and skills development and market development. A theory of change needs to consider skills development and employment beyond the current crisis. Alongside technical skills we need to support the development of transferable skills such as critical thinking, communication and collaboration.

Secondly, key city partners need to be used to deliver areas of this work and develop a collaborative city business change transition strategy with skills and capacity building.

Thirdly, a collaborative lifelong learning framework for city transition needs to be mapped out.

Finally, the creation of a forum to convene regional and national cross sector collaboration on skills and capabilities would be helpful and the Commission is willing to provoke this. Across Scotland, there are similar challenges. And in some parts of the country, specific investments through Region Deals, Growth Accelerators and Net Zero partnerships to address aspects of these challenges.

At the heart of building the future skills ecosystem in the Edinburgh region, there is also a need for:

1. Clarity on the key focus and core intentions of the 2030 Strategy (with respect to business and skills)
2. System leadership around these priorities by the key partners delivering skills and change in the region
3. 'Big asks' for big change across the partners, with a commitment to shared accountability to deliver

Engaging and empowering citizens to help tackle climate change

The draft strategy places significant reliance on individual changes which will demand consensus and confidence of the populace. Influencing behavioural change will not only rely on consistent (corporate) messaging led by and across all Government levels, but also on the context for those changes to be made to be created.

Although it is clear that emissions from individuals and households make up over half of Edinburgh's total footprint, change at an individual level is not a simple case of citizens being informed and choosing to act. The draft strategy acknowledges that nearly 80% of Scottish Household Survey respondents believe climate change is an urgent problem. As such, citizens need the context for change to shift, not their attitudes; the strategy in its draft form underplays the importance of the wider conditions that enable, promote and encourage change, or that make net zero lifestyles the default option.

This chapter should be reframed around creating and enabling the context for low carbon action and communicating the benefits of this. It should not be asking citizens to make changes despite a challenging context.

The list of actions around creating a city where sustainable choices are easier at the end of this chapter suggests that this is acknowledged. However future engagement must not focus

on simply asking citizens to take action – it must focus on promoting and ensuring the change in the context of city wide, organisational and national changes that enable individuals to change.

The pandemic has amply demonstrated the difficulties in communicating change and the negative impact of inconsistent messaging. Citizen engagement requires more than just raising awareness. It needs to demonstrate the timelines for change; the benefits of change; the practical implications; demonstration and proof of concept (technology), and; means of and access to resources. Most importantly however, the Council must identify and work through wider influencers to communicate these messages; this will enable the identifications of who is best placed to effectively engage with the diverse audiences that comprise the citizens of Edinburgh.

Regarding engagement with young people, the Commission feels that more could be done to engage young people. The organisations the Commission has consulted with as part of our engagement have both highlighted that it is a “*relief to see these ambitions [to engage young people and citizens] set out by a Local Authority*”, but also expressed concerns that the content of the consultation materials and strategy were ‘inaccessible’ to them. To build on this the Commission feels the Council could be more transparent and accessible in how it is working with and considering the views of young people and other citizens in its climate work. The Perthshire Youth Council and youth forums were suggested as examples which could be emulated to ensure better youth integration into teams and climate planning.

The Commission welcomes the work the Council is already doing with third sector organisations and community groups. A continued commitment to this type of engagement is key to ensuring marginalised groups are heard and engaged on urban development and climate action.

Investing in change

The Commission recognises the opportunity that Edinburgh has to promote “*Investing in change*” in the run up to COP26 and beyond. Edinburgh is a leading UK financial centre with a reputation for prudence, in recent times this reputation has been damaged through financial excess and irresponsible risk management practices, ultimately leading to society bailing out financial institutions in 2008. Now is the time for those financial institutions to repay society by redirecting capital to the development required to realise a net zero future. UK financial institutions such as The Royal Bank of Scotland, now re-named NatWest are keenly aware of the moral obligation incurred during the crisis and are actively seeking to pivot their purpose and strategy towards the delivery of finance which supports sustainable development¹. Edinburgh is well placed to capitalise on this emerging trend and promote the need for a more purposeful and sustainable version of the financial system.

The Commission supports the development of Nature Climate Bonds and Community Investment Bonds - however these initiatives alone will be insufficient. The recent ABI Climate Roadmap² outlines a potential £900bn which could be unlocked to support investment in the net zero transition. Edinburgh Council is well placed to capitalise on an

¹ NatWest Purpose Statement: <https://www.natwestgroup.com/our-purpose/environment/climate-and-sustainable-finance.html>

² ABI Climate Roadmap, (July 2021); <https://www.abi.org.uk/globalassets/files/publications/public/climate-change/abi-climate-roadmap2.pdf>

emerging demand for 'regional transition investment hubs'³. The Commission encourages the Council to work with the new Scottish National Investment Bank, financial institutions which have a presence in Scotland and organisations which support innovation in financing the transition; such as the Place-Based Climate Action Network, UK100 and the Grantham Institute work on Financing a Just Transition to develop the first Scottish Investment Hub. The Commission challenges the Council to take forward at pace, activity which aggregates disparate projects into 'investable' packages and to engage with the relevant bodies to access private capital at scale.

It is clear that public funding, in the current structure, will be insufficient to meet demand, however there are historic funding mechanisms such as municipal bonds⁴ which could be reinvigorated and channelled towards long term investment in transitional infrastructure. The Commission will support Edinburgh Council in using its position as the capital city of Scotland and a world leading financial centre to convening cities such as Aberdeen and regional areas such as the Highland & Islands to explore the potential of this type of devolved funding mechanisms to unlock long term investment capital and direct this towards place-based change.

Offsetting

The draft 2030 Climate Strategy is right to acknowledge that where there is a net zero target there is an eventual requirement for the use of greenhouse gas offsetting.

However, it is also right to describe a great deal of justified scepticism around approaches to offsetting (perhaps most recently illustrated by forest offsets being destroyed in fires <https://www.politico.com/news/2021/07/27/wildfires-rage-carbon-credits-500830>).

The Commission has two overriding concerns regarding the use of carbon offsets in the context of meeting the 2030 net zero target.

Firstly, there is a challenge in guaranteeing emissions sequestered through offsetting are actually additional to the emissions required to be captured to meet UK net zero targets, otherwise there is a high risk of double counting and no net benefit to the climate. The high levels of tree planting, peatland restoration, soil improvement and so on, that are already required in order to offset unavoidable emissions from 'hard to treat' sectors such as heavy industry and agriculture at the scale of Scotland and the UK makes it very difficult to see how Edinburgh could identify additional offsets.

Secondly, there is an issue around offsetting against a 2030 date. It is very important that we don't reach for an offset solution (even a credible one) for a sector that is expected and required to ultimately get to absolute zero emissions.

Implementation

It is expected that the coming Implementation Plan employs high standards of accountability and transparency.

³ ABI Climate Roadmap, (July,2021); Pillar 2; Recommendation 2.2

⁴ ABI Climate Roadmap; Pillar 2; Recommendation 1.2,

A clear decarbonisation route-map to 2030 is required from the final Plan, including known policy and regulatory changes, outlining key planned practical milestones.

It is critically important that the plan includes indicators setting out the required pace of change.