



# Midlothian Climate Action Hub

## Response to the Scottish Government's draft Climate Change Plan consultation

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## 1. What are your views on the Scottish Government's (SG) approach to delivering a just transition for people and communities?

The Hub welcomes the positive strategic intent of the draft plan around just transition principles and its importance.

We acknowledge some work done to date, such as establishing the Just Transition Commission and work on Just Transition Plans for transport, Land Use and Agriculture, and Grangemouth and Mossmorran. However, there seems to be a lack of clear concrete action across this draft and Just transition Plans. They need to move from high level strategies to clear implementation plans with clear measurable indicators.

While we welcome the upcoming Rural Delivery and National Islands plans, we hope to see outlined concrete actions on how these communities will be supported in a just transition, given their susceptibility to climate change effects. The plan also fails to outline actions that will be taken to support other demographics most vulnerable to climate change. It is positive that groups such as young people, minority ethnic communities, people from low-income households and single parents are being reached through trusted organisations, however no other mention is made of these groups. The plan does not outline what actions will be taken to improve support to communities most affected by climate change and seems to lack any specific funding or support targeted towards ethnic minority and disabled communities to ensure they are not left behind in the transition to net zero. The Scottish Government should implement a fund to support those that will be affected by climate change and transition to ensure stability for these communities.

We recommend co-working on just transition plans with small community organisations', such as community development trusts, that already work with communities most affected by the climate crisis, in line with the plan's commitment to reach people through trusted organisations. These development trusts and equivalent community organisations are best



placed to effectively use funding and support to concretely support people.

The hub is very concerned about the funding and support for carbon capture and storage in the draft plan, especially on how this will affect the workers in North East Scotland. CCS is an unproven technology that does not provide sustainable green jobs to workers transitioning away from oil and gas. Therefore, we agree with Stop Climate Chaos Scotland that we need more concrete Just Transition plans than outlined in the draft climate change plan.

We support their asks to:

- Establish the Just Transition Commission as a permanent, statutory body with a remit to provide advice to the government and a duty on Scottish Ministers to have due regard to its advice. Strong institutional and scrutiny mechanisms are essential to increase confidence that the CCP will be delivered in practice.
- Publish finalised and strengthened Just Transition Plans for transport, agriculture/land use, buildings and other sectors.
- Urgently create strengthened, action-focused and fully funded Just Transition Plans for Grangemouth and Mossmorran – but also for the wider oil and gas sector (see also our comments on energy supply, below).

### **Funding stability and longevity for Climate Hubs**

The Midlothian Climate Action Hub joins other climate action hubs in a call to more stability for Climate Action Hubs to support delivering a just transition. We support FFCAN and ELCAN's statement:

“Hubs operate on year-to-year funding cycles, often receiving budget confirmation late in the fiscal year. This creates a short delivery window that makes long-term planning impossible. We advocate for a minimum of five-year funding cycles. This would provide the stability needed for Hubs to build long-term local skills, maintain consistency, secure mixed funding sources and successfully deliver complex community projects. Short-term



funding leads to high staff turnover. It takes roughly six months for a new staff member to gain the necessary local policy expertise; the current model often sees them leaving just as they become effective due to contract uncertainty. While we recognise the Scottish Government operates within an annual settlement from the UK Government, we suggest the Scottish Government commit to a safe baseline of multi-year funding for the Hubs programme, with "top-up" options should additional funds become available.”

### **Concern from Midlothian about those affected by the transition**

We would also bring to the attention of the Scottish Government that delivering a just transition is of concern to the young people in Midlothian, with one young person from our member Seeds of Disruption stating that “ Oil and gas workers are in an in-between where they lack support from many political parties because of their connection to oil but also their status as working class people”.

The National Mining Museum, one of the members of the hub elaborates on this point:

“To quote one of our colleagues, who was commenting about his role in the Miner’s Strike of 84-85: “after Bilston Glen closed, I didn’t just lose my job, I lost my identity.”

As a community shaped by the legacy of coal, oil and energy-intensive industries, we’ve already lived through the pain of economic transition. The Scottish Government’s Climate Change Plan rightly puts a just transition at its core, recognising that Net Zero must be fair and must avoid the unplanned decline that devastated many towns in the past. That commitment — especially the acknowledgement that past transitions left deep scars — is genuinely welcome. It’s clear in the Plan that just transition principles are statutory and embedded across policy areas, and that people and communities are intended to be part of shaping the journey to Net Zero rather than having changes imposed on them.



From our perspective as an institution that works with people’s history and tells the story of communities and industrial heritage, the Scottish Government’s approach to just transition shows real strengths in principle and engagement:

- The Plan places participation and community empowerment at its heart, aiming to involve thousands of people in shaping policies and providing opportunities for communities to allocate funds where they see fit.
- Initiatives like the Climate Engagement Fund and local action hubs help people understand and co-design how the transition affects their places and lives, which is central to fostering public trust and shared purpose.

We also see positive alignment with broader commitments, such as connecting climate action to social justice, skill development, and equity, helping to frame Net Zero as not just an environmental shift but a societal transformation

However, in our lived experience there are mixed feelings about how this is playing out on the ground. Engagement and more sustained jobs commitments — not just short-term funding — are needed, so people aren’t left in limbo.

From our interactions with visitors and communities, there are nuanced critiques, including:

- Some feel that large-scale infrastructure projects (like renewables and new transmission lines) are advancing faster than meaningful local consensus building, especially in rural areas.
- Others want to see the Government’s vision matched by clearer, measurable outcomes for community well-being and economic stability, not just broad targets.



As stewards of culture and community memory, we appreciate the intentional, principle-based approach, and we encourage ongoing dialogue so that transition reflects both heritage and future needs.

Both perspectives welcome the Scottish Government's commitment to a just transition — particularly its statutory principles, participatory aims, and funding mechanisms. At the same time, many affected communities are asking for; greater local agency and clearer outcomes and we would welcome the continued support to grassroots community groups and agencies, more sustained job creation and skills pathways along with training opportunities across sectors and deeper community consultation as a genuine partnership, not a formality. “

## 2. What skills, training and qualification provisions will be most important in a net zero future and what more could be done to support them?

**The hub strongly urges increased climate and sustainability learning in workplaces and education systems.**

The Hub finds that there is a clear lack of education policies or actions in the CCP. We echo the Fife and East Lothian Hubs statement that the plan lacks sufficient mention of Learning for Sustainability (LfS), a cornerstone of Scottish education policy. We recommend that the government should weave learning for sustainability throughout the climate change adaptation plan, making climate action learning a priority in a fair transition. We believe the plan should include requiring schools, especially high schools, to concretely embed learning outdoors and climate literacy into their curriculum. Adding to this – one of our members states the plan should include strategy to " Improve Connection to outdoor spaces. This includes increasing outdoor learning for all schools. A child will not learn the value of nature if they've spent most of their time disconnected from it.”



## **Increasing green jobs**

One of our member organisations, The National Mining Museum states “The focus on engaging workers, skills training and community participation resonates strongly with many in ex-mining communities across Scotland. The idea of new jobs in green sectors, coupled with funding for community-led projects, signals that change can bring real opportunities for growth and local leadership.” The hub agrees that investing in green jobs is vital for the transition, and we discuss in what specific sectors below.

More investment needs to be placed on upskilling and training communities that want to start community energy projects. We are encouraged by the current funding and support for community energy that exists, but more is needed in terms of investment and funds for community members to upskill themselves on creating local energy projects that benefit communities and build local wealth.

Similarly, while we welcome the Heat Networks Support Unit and Scotland’s Heat Network Fund present in the draft plan, a significant knowledge and capacity gap within the community sector will prevent most groups from engaging with or benefiting from these opportunities. A clear pathway is needed on how to make heat networks more accessible for potentially interested groups, as well as opportunities for training local people in the skills and expertise required to develop and manage heat networks.

More funding for local authorities is needed with a specific focus in ensuring they have the skills required to both address the climate and nature crises. Midlothian Council does not have sufficient funding or the requirement to guarantee a biodiversity officer in the council. This should be required from local authorities, especially to support the planning department, especially in council areas like Midlothian which have substantial amounts of new housing developments.



Local authorities should additionally support the creation of green and conservation roles within the greenspace team and the council in general. Midlothian council, for example, is currently very lacking in any conservation team. Skills Development Scotland in Midlothian states: “Midlothian Council, SRUC and Edinburgh College especially need to offer local opportunities for training and employment as well as local farmers encouraging and supporting Modern Apprenticeship schemes”

As discussed in questions 13 and 15, Midlothian has a notable lack of sustainable and regenerative farms, despite having a substantial amount of land in the region dedicating to farming. Increased funding to train local farmers and growers in sustainable and regenerative agriculture would allow a transition to healthier, more resilient and more sustainable local food, as well as allowing opportunities for more local growing roles. Currently, training on sustainable and regenerative agriculture practices is expensive for local growers that run community growing schemes, making it inaccessible for local communities and slowing progress towards a more sustainable regional food system. Funds to support this training for community growing would upskill local growers but also allow these people to support and upskill their community.

Similarly, we believe there should be more funding to support informal and formal training, such as apprenticeships on circular economy skills, such as clothing mending, furniture repair, and electronic repair. Increasing the accessibility of these skills to local communities would allow more people to access jobs that may struggle with a traditional university route. It would create more jobs that support the needs of the local community, help reduce emission associated with extraction, transport and production of new products, and support the Scottish Government’s commitment to “move from a linear “take, make and dispose” economic model to a circular economy where materials and goods are valued and kept in use for as long as possible.

Our community highlights some specific job roles that should be supported:



Handicabs Lothian indicates a need for increased “EV driver training for community transport”. In the same vein, Skills Development Scotland Midlothian highlights that: “Only 31% of maintenance technicians able to service electric and hybrid vehicles, there is significant demand for skilled workers in this area”. Meanwhile, Friends of Roslin Moat outlines a need for more training in installing clean heating systems.

### **Removing barriers to green employment**

Overall, the hub strongly supports the statement by one of the members of our community that we should “ Retain funded higher education tuition and have specialised re-training funds targeted at workers affected by the transition” The hub advocates to include both younger people but additionally older people re-training into green jobs. We need clear pathways and support for those re-training that will be facing substantial salary cuts.

There should also be increased support for conservation organisations to create more entry level and internship green roles. It is currently difficult to get into conservation and nature jobs without a huge volunteering commitment, which many people, especially those with lower income, cannot afford to do. A clear path from volunteering into entry level job roles would support more conservation and biodiversity job roles. The hub has supported and worked with multiple young people in Midlothian that have taken part in conservation volunteering and would be interested in entering the conservation sector but may struggle with the job market.

We echo the sentiment of FCCAN and ELCAN that:

We support the exploration of Universal Basic Income (UBI) or enhanced social and financial safety nets to act as a financial stop-gap for those undergoing retraining, reducing the personal risk associated with career transitions. This is significant as a significant portion of the climate action movement and the third sector currently relies on unpaid volunteers. The Scottish Government should fund and employ people for this work, solving both employment and climate goals simultaneously.



### 3. How can SG best support employers across the private, public and third sectors to make the changes needed and seize the benefits of net zero?

The Scottish Government can best support third-sector employers by recognising and addressing their specific barriers: lack of capacity (staff time and expertise), complex and short-term funding landscape, and frequent lack of asset ownership. For third sector organisations and community groups it is often the lack of capacity, resources and difficulty accessing the right information that prevents groups from decarbonising and having a more active role in decreasing emissions.

Support needs to move beyond generic advice to concrete, fully funded, and practical support. Our recommendations below are collated from feedback offered by members from our network.

- Grants must be multi-year and explicitly fund the staff time, project management, and specialist expertise required to plan and deliver decarbonisation and climate-readiness. Short-term, project-based funding is insufficient for implementing long-term climate solutions. Available funds should recognise this and cover long-term capacity costs, particularly the staff time required for implementation.
- Create and actively promote clear, sector specific, step-by-step guidance on how to decarbonise operations and become more sustainable. This should include access to practical toolkits, case studies, expertise, free access to climate literacy and multi-year funding. Crucially, it must highlight the co-benefits (e.g., cost savings, resilience, community impact) to motivate action. While the Climate Action Hubs can and should play an important role in offering this information, they suffer from the similar capacity barriers & insecure funding to adequately meet the needs of third sector organisations. Better national support is needed for Climate



Action Hubs to be able to properly communicate available options and support groups in the decarbonising journey. This should include centralised resources and guides, as well as training opportunities and easy access to expert advice.

- Many third sector organisations do not own their own buildings or infrastructure. Better fund mechanisms and frameworks need to be in place to support these groups decarbonise. This includes: a) funding and support for improvements in rented spaces, including measures to require landlord cooperation and action, and b) support for groups to purchase shared infrastructure, such as electric vehicles, heat pumps or community-owned energy assets, benefiting from a sharing economy and economics of scale. Some of our members have emphasised the need for support to get accessible and adaptable electric vehicles, as this is still not the norm.

#### 4. What are your views on SG's approach to supporting places where the transition presents particular regional impacts?

While we welcome the upcoming Rural Delivery and National Islands plans these must have outlined concrete actions on how these communities will be supported in a just transition, given their susceptibility to climate change effects. Similarly, further Just Transition Plans for specific communities affected by the transition to net zero are needed without delay, including the promised Just transition Plan for Mosmorran. These need to above all involve local communities, community groups and regional Climate Action Hubs to ensure they reflect the needs and wants of local communities.

While Midlothian does not face the same challenges and impacts as many other regions, it has many ex- mining communities that have been shaped by a poor transition away from coal. This offers a strong parallel to what many communities are going through now in other parts of Scotland and is what informed the section below.



## **Transition in the North East**

The Scottish Government should not support the Energy Transition Zone in Aberdeen as part of their regional North East Just Transition strategy. There is major opposition from the local community of Torry on the ETZ, and, it would be built on top of a local green space and biodiverse area. The Torry community has already been neglected and thrown aside, with the Aberdeen Harbor, primarily being used for oil and gas, already having been built on what was once part of the Torry community. The Energy Transition Zone is the opposite of a just transition, and the government should instead spend this money concretely supporting the local communities of Aberdeen.

Overall, the communities of the Northeast and Aberdeen need to concretely feel the positive effects of the just transition goals of the Scottish Government. The National Mining museum states that: "Some groups feel that the promised green jobs haven't materialized at the scale needed yet in places like Fife or Aberdeenshire, and that rural areas are bearing disproportionate impacts from infrastructure development without always feeling genuinely empowered in decision-making"

The Just Transition in the North East should be concretely fed in to and co-designed by local communities. The government should allow communities in the North East more control and participation in what is invested in and how, to avoid situations such as the Energy Transition Zone in Aberdeen.

## **5. How can SG decarbonise homes and buildings in a way that is fair and leaves no one behind?**

The draft CCP doesn't seem to add any new measures on top of what was already underway or detail a pathway for clear rollout of clean heating systems or plan to decarbonising homes. The postponing of policies to yet another plan will keep delaying the effective transition to decarbonise



homes and make it harder to achieve the CCC's pathway of 40% homes with clean heating by 2035.

The following recommendations reflect the views offered by our network:

The final CCP must commit to introducing robust Heat in Buildings legislation early in the next Parliament. This should establish a clear, regulated pathway for decarbonising all homes, not just those eligible for current support schemes.

### **Grants and Schemes**

The various incentive schemes must not only continue but be significantly enhanced and guaranteed with multi-year budgets to drive sustained action and ensure we meet emission targets.

While we understand the Scottish Government cannot fund the clean heat transition alone, we worry that the current levels of grants available to those that do not meet the threshold for support will be prohibitive for low and middle income families unable to support the remaining cost. The ongoing cost of living crisis means that even households that are not in fuel poverty or receiving benefits do not have the disposable income to invest in expensive retrofit solutions or heating systems. This will create an unequal implementation that will delay uptake and lead to increase of cost and demand down the line as targets need to be met.

Furthermore, a fair transition cannot depend on home ownership. The plan must strengthen tenants' rights and landlords' obligations, ensuring those in rented homes benefit from upgrades. Minimum standards for the private rented sector must be ambitious and enforced. While the Social Housing Net Zero Heat Fund has helped tenants living in social housing (including in Midlothian), there is a clear lack of support for tenants in private housing, who have no say in their building's decarbonisation. Support needs to be by household need and building type, not tenure, ensuring lower-to-middle income owner-occupiers and private renters are not excluded.

### **Retrofit and new builds**



Prioritise retrofit over demolition. Retrofitting existing buildings must be prioritised over demolition, as the embodied carbon cost of upgrade is far lower than rebuild. Construction waste accounts for almost half of all waste produced in the UK. A clear pathway for retrofit of old buildings that doesn't include demolition will not only decrease waste, but all associated emission from production of raw materials.

All new developments must include mandatory climate-friendly heating systems and solar panels, and have a high energy efficiency to prevent future need for retrofit costs.

### **Guidance and incentives.**

Households and community organisations need clarity, obvious financial incentives, and certainty to act. There needs to be a clear, accessible, step-by-step guidance for communities and third sector organisations. This includes clear digital resources, but also more organisations capable of supporting groups and households to decarbonise their homes, find sustainable materials suitable for retrofit, and install heating alternatives (such as heat pumps) or solar panels. Finding the right information at the moment can be difficult and overwhelming for anyone, but this is particularly true for individuals with no base knowledge of existing schemes and technologies.

Climate Action Hubs could and should play an important role in providing the right information and signpost resources to people and community groups. However, unreliable funding and lack of skilled expertise in this fairly complex field makes it particularly difficult to be effective. Better national support is needed for Climate Action Hubs to be able to properly communicate available options and support groups in the decarbonising journey. This should include centralised resources and guides, as well as training opportunities and easy access to expert advice.



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

Affordability isn't simply about upfront cost. Ensuring the affordability of clean heating systems will require a strategy that addresses the prohibitive upfront costs, but also builds public confidence and makes clear the financial benefits for people. Our recommendations, based on feedback from our members, are:

- To lower upfront barriers, create a more accessible and predictable funding landscape by offering easier-to-access grants and zero-interest loans. There needs to be clear information and support for people that fall outside of existing support schemes that will lead them to commit to the change.
- Affordability depends on reducing long-term bills. Financial incentives, such as lower tariffs for those using heat pumps, could make a difference in making people feel lower costs from day one.
- Build trust in the technology and demand by actively promoting and funding local pilot projects and case studies that provide tangible, relatable evidence of long-term energy savings and performance. There is a pilot in Mayfield, Midlothian with two identical houses, one with a heat pump, one without, that is testing the effectiveness of a heat pump to save energy. Case-studies build from similar programmes with good marketing can make a difference in building public trust and increase demand.
- Implement clear regulations that ensure high-quality installations and consumer protections in order to increasing confidence in the technology.
- The lack of clear information on different types of heating systems may also be confusing for people regarding the appropriate heating systems in their case. Any mass campaign around heating systems should make clear which ones are appropriate in which cases or what people could expect to be rolled out in their local areas and when.



## Heat Networks

Heat networks could play a huge roll in affordability, however this is a concept that still feels too disconnected from many people’s lives. An effective information campaign, especially in areas that could soon see heat networks rolled out, could play a massive part in people understanding their role and how it could benefit them.

Heat Networks owned and managed by local communities or local authorities should be given priority. While the initial capital investment is significant, these models offer the potential for more affordable energy in the long term, as they operate on a not-for-profit basis for community benefit. The recent feasibility study for a community-led network by East Lothian Heat provides a relevant and actionable model for this approach.

While we welcome the Heat Networks Support Unit and Scotland’s Heat Network Fund present in the draft plan, a significant knowledge and capacity gap within the community sector will prevent most groups from engaging with or benefiting from these opportunities. A clear pathway is needed on how to make heat networks more accessible for potentially interested groups, as well as how they can access the skills and expertise required to develop and manage heat network projects.

## 8. How can SG support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?

We strongly agree with what was stated by one of our community members that “There is apathy about this because no one thinks they are being listened to. Please make it worth people's time if you wish a community to participate.”



Consultations are often long, time consuming and often give the impression that a baseline knowledge of the issue is required. For this reason, the planning process is biased against community voices in favour of those that have the time, resources and financial power to pay staff to do so, such as housing developers. This leads to local community not feeling empowered and feeling it is not worth their time participating in planning, especially as time and time again they see decisions being made that go against the wishes of their members.

We support our steering group's recommendation that the government needs to "Strengthen the Community Councils, as they are the route into real community engagement." Strengthening should look like a concrete requirement for community councils concerns to be implemented in local place plans and council development plans. Especially in Midlothian, Community councils take up a lot of time and admin and often feel that they are not listened to, and their concerns not sufficiently addressed. Stronger Community Councils will allow for improved engagement with local communities on active travel.

Based on the Hub's own experience of community engagement, the Scottish Government should move beyond consultation methods to engage the local community, especially when they involve bringing external companies with no understanding of the local realities. Running local, in person sessions, that provide free childcare and free food, at a variety of different times in the day, makes these sessions more accessible to everyone. These sessions should be run in conjunction with local groups that know their community best: community councils, development trusts, etc.

No consultation or plan process should be concluded until a target number of local community voices have been listened to, especially members of the community that are often not included such as: young people, ethnic minority groups, disabled people and lower income people. Disability friendly active travel and adaptive travel is especially rarely considered in active travel plans. These planning processes should have a



quota of how many people in the local community and out of each of these demographics they have engaged before they are able to proceed.

Have a requirement to implement some of the suggestions and wants of the local community in their plan. This should go along with involving people in co-planning and asking what active travel solutions work for the local community, as opposed to deciding what active travel will go forwards and then undertaking a “tick box consultation”. If consultations are purely to fulfil a policy requirement, and the community does not have the ability to concretely affect the planning process, the community will never engage, as it is not worth their while.

We have asked our members what are specific sustainable infrastructure they’d like to see more. Here’s a list compiled from theirs and the Hub’s recommendations.

- Towns should be for people first. They should be more walkable and have better cycling infrastructure.
- New developments are often isolated from amenities, which makes walking to get your groceries, to a local café, or to a local community hub difficult without a vehicle. There is a clear need for new developments to include space for amenities, as well as better access to public transport and cycle paths.
- Safe pavements that are well built and wide enough make walking more accessible to everyone.
- Improvement to road infrastructure to help safe cycling, environmentally friendly street lighting, cycle/path networks away from main roads
- Safe and dry bike parking, so as to have increased confidence your bike won’t be stolen or wet.
- Cheap rent-a-bike schemes should be widespread and affordable
- Workshops on how to fix bikes should be more widespread as this can often be expensive

## **Electric Vehicles**



The Hub believes the Scottish Government should support the third sector in general in moving towards electric vehicles, which supports our rankings of answers on question 7. One of our members states “ There is a concern that unless there is greater investment into EV community transport in the third sector people who are already disadvantaged will be become more isolated due to cost”

Electric Vehicle infrastructure should specifically support community groups when possible. The hub’s steering group suggests that the climate change plan should include support for community development trusts and other similar anchor organisations to own and operate electric vehicle charging stations that could help them make revenue and build local wealth.

### **Flying and Transport**

The hub welcomes the private jet tax in the new budget but believe it should go further still by introducing a levy for frequent flyers, excluding necessary island flights. This should go along with making rail and bus transport cheaper, and providing more free transport options, which the taxes from air travel could be used to fund. This would align with the Scottish Government’s just transition and polluter pays commitments. In Midlothian, there is a particularly large need for increased public transport that is also affordable, as the area has significant patches of lower income communities and is lacking in reliable, fast, and frequent transport across the region.

## **9. What action by SG would be most helpful in supporting you to live a more climate-friendly lifestyle?**

To answer this particular question we gathered a variety of responses from our members.

One of the most common answers was the need to reduce the cost of living through warmer homes. Some members went into further detail,



highlighting that this should be through more grants and better support to access energy efficiency improvements. Even though schemes are available to help people in fuel poverty, as well as grants and loans to support energy efficiency improvements the number of similar responses highlights the need for a better education campaign on the options available and when they are appropriate.

Another common response was the need to further promote active travel as a way to also improve wellbeing and reduce NHS strain. This would go along with improved infrastructure so that cyclists and individuals don't have to share the road with cars as much. One member commented how the poor road conditions in Midlothian mean that people choose not to travel actively.

Some members indicated that making other forms of travel more affordable than flying would substantially help them in being more climate friendly, as currently flying is often cheaper in many cases. Multiple groups bring up the lack of support on travel in general. Handicabs Lothian highlighted the need to invest in third sector community transport options to allow their vehicles to be electric and allow for more shared journeys. Other members highlight the general lack of affordability of electric cars, and lack of alternative non-car transport options in rural areas. One member suggested extending the mile radius of non-ozone friendly vehicles in Edinburgh as an incentive.

A few indicated that removing single use plastic and making products more ecofriendly would help them live a more climate-friendly lifestyle. This would go along with more clear labelling of items in products that are environmentally unfriendly, such as palm oil.



## 10. Are there any additional proposals to support waste sector emission reduction that should be considered across the following 5 areas?

We welcome the plan's commitment "to building a circular economy, moving from a "take, make and dispose" model to one where we value our materials and keep them in use for as long as possible"

We welcome recognition of emission out of Scotland driven by "the goods and services we consume, regardless of where they are produced."

However, the draft Climate Change Plan (much like the draft Circular Economy Strategy at the time of writing) is not ambitious enough and do not place enough emphasis on producer responsibility.

By focusing on product stewardship, the plan puts equal responsibility on consumer and producer, placing an unfair and ineffective burden on consumers who have limited influence over product design and materials. Stronger policy that leads to system-wide change is needed to allow for consumer behaviour to change.

The plan needs to be more firmly grounded in the polluter pays principle and supported by an ambitious Extended Producer Responsibility (EPR) programme, ensuring that the largest producers of waste, including single-use plastics and other non-recyclable or non-reusable materials, are legally required to fund prevention, reuse, recycling, and safe end-of-life management. This was supported by the statement of a young person from our member Seeds of Disruption, who said that "there should be regulated minimum year warranties for many products that would make companies value durability".

The Plan needs to go further and include a clear, time-bound strategy to eliminate all non-essential single-use plastics, starting with a ban on their sale in retail settings. This should be coupled with support for the development of sustainable alternatives. This sentiment was echoed by several of our members, with a young person involved in one of the groups



specifically saying that more packaging should be paper or cardboard, and there should be more unwrapped or open produce available.

Furthermore, a significant increase in investment and policy support is required to make reuse and repair mainstream. Communities themselves should be at the forefront of the reuse revolution. This includes dedicated funding, infrastructure, and support for community-led reuse and repair initiatives, ensuring social and economic benefits are retained locally.

The combination of the above recommendations would benefit Scotland in three capacities: reduce emissions associated with extraction, transport and production of new products, strengthen local communities and help wealth stay local, and reduce the amount of waste going into landfill and polluting our waters and natural landscapes.

## 11. What are your views on Scotland generating more electricity from renewable sources?

The Hub strongly supports increased production of electricity through renewable sources, especially as demand is expected to rise due to electrification of heating, transport and industry.

Scotland is very well placed to harness various types of renewable energy and should take advantage of this position. However, to ensure this growth is sustainable and aligned with broader sustainability goals, the following key considerations should be central to the plan:

1. New renewable developments must not exacerbate the nature crisis. We need stronger, mandatory safeguards for site selection and environmental assessments to protect biodiverse habitats.
2. We need to prioritise demand reduction alongside supply growth. The rise in demand from electrification must be countered through improved energy efficiency in homes and industry.
3. Decarbonisation should not come at the cost of creating large future waste streams or generating social and environmental harms



elsewhere. There needs to be stronger emphasis on end-of-life planning for renewable energy assets, prioritising repowering, refurbishment, and modular upgrades rather than full replacement. Circular economy principles should be embedded at every stage, from design and procurement to decommissioning, ensuring that materials stay in use as long as possible and that potential waste is minimised.

4. There needs to be a strong emphasis on Community-owned energy to ensure local communities are active participants and beneficiaries from the energy transition. There is good progress with CARES funding and other initiatives, but involving communities needs to be a stronger part of Scotland's plan moving forward. This includes a) stronger policy to ensure local communities benefit socially and economically from projects in their area, b) clear policy for communities to have first right of repurpose or ownership for decommissioned assets and components, and c) more funding and technical support for communities to develop and own renewable energy assets. We note the mention of piloting enhancements to the Community Asset Transfer Scheme that would directly support the above and strongly support this.
5. We note the mention of the Acorn project and CCS and are concerned this may indicate an increasing focus and financing on these technologies as an alternative to reducing energy demand through increasing efficiency across sectors. Given the lack of proven effectiveness at scale and high costs, public investment and policy should prioritise renewable generation

### 13. How can SG encourage sustainable land use, that is also productive for local communities?

Midlothian currently has no vegetable growing farms, and a lack of sustainable and regenerative farming, despite being a council area that contains considerable amounts of farmland. As stated before, increased



funding and resources for sustainable and regenerative growing and for biodiversity creation on farmland would support the move towards a more sustainable and resilient food system we need and improve access to healthy, local food. This would also go hand in hand with increased support for community ownership, to financially support more communities to farm and grow their own food, such as through community supported agriculture and allotments. A member of our community, Newton Parish Church, shares similar feelings that stating that we should be able to buy locally produce food and “subsidise local farmers to produce local seasonal produce at affordable prices” The government should include increased incentives and pathways towards sustainable and regenerative farming, especially as an alternative to livestock farming, as part of the measures to reduce emissions.

Midlothian also has large swathes of land that are privately owned. The Hub has been exploring the possibility of a community nature restoration project, but the vast quantities of land in Midlothian that are privately owned make this incredibly difficult to execute. The Scottish Government should support community land ownership or management for biodiversity restoration purposes. This could be compulsory for buy outs or management leases for the community from large private estates, specifically if the purpose is for nature restoration. This would increase jobs in local communities, support the Scottish government to meet environment targets, and support Scotland’s commitment towards land reform. One of our members, Growing Families stated that “Too much land has been sold to private developers, which has fragmented our communities even further.” Another of our members, Friends of Roslin Moat, highlighted that a key first step towards this would be making data easily and clearly available on who owns what lands, so that communities can find out who land owners are in their area.



Another key target of the Scottish government to encourage sustainable land use should be increasing the support for community garden creation and maintenance, such as through targeted funds to support this. Growing Families stated: “Communities in post-industrial land suffer from the land being sold off to businesses, there is no sense of ownership or pride. Community Gardens can bridge this gap, especially in areas of deprivation where studies show access to green space is compromised.”

#### 14. What do you think about SG’s proposals for planting trees and restoring natural habitats like peatlands?

##### **Forestry**

The hub is excited about the positive forestry and peatland creation goals of the government, but there should be concrete increased funding and support in the climate change plan to support this. We note that the draft plan currently primarily re-iterates much of the existing policies and support. It is vital that the plan supports the creation of biodiverse woodland. There should be provisions in the plan to enhance and protect existing woodland, to ensure our current woodland remains biodiverse and continues removing carbon from the air. The hub is concerned that the draft plan will result in an increase in forestry monoculture (such as Sitka spruce plantations), which has very minor biodiversity value. The plan should include requirements for certain amounts of woodland creation and biodiversity creation, instead of primarily encouraging commercial forestry.

The plan should include increased funding to the forestry grant scheme, and additional to this, a provision to support the creation of community woodlands. Community woodlands would support community climate education and creation of green job goals. Both additions to the plan would support the increase of people working in the sector, create more green jobs, and so aid in the Scottish Government’s just transition goals.



## **Peatland**

The current draft plan has little mention of protection of existing peatland. The government needs to include protections against the overgrazing of peatlands and so implement restrictions on livestock grazing. The plan should be putting in place concrete targets for increased peatland creation, that includes requirements of large private landowners to protect and restore peatland. It is unclear from the climate change plan how the government will actually achieve their goal of restoring 250,000 hectares, without increased policy and funding support that results in land use change.

Overall, the community groups in Midlothian are also keen to see increased biodiversity and habitat conservation, and it is close to many people's hearts. The increase in woodland planting and peatland creation would have multiple health and wellbeing co-benefits for people in Midlothian and Scotland, generally.

### **15. How can SG support farming to become more climate-friendly while continuing to support food production & improve biodiversity?**

The Climate Hub is disappointed in the lack of any mention on changing our food system to being more plant based. We strongly believe the climate change plan should include tangible actions to encourage plant-based eating and food production, as this will have by far the biggest impact in reducing emissions from agriculture. Livestock farming is the biggest source of agriculture emissions. Therefore, no action in the plan to reduce livestock production casts in to doubt the ability to reach net zero in the agriculture sector. The plan does not act on the CCC balanced pathway recommendations to reduce meat consumption and livestock numbers significantly to reach net zero.



This could look like support and subsidies to move farmers towards organic arable farming and/or vegetable production, which at the current moment is often not profitable or viable. Increased regenerative farming practices and a reduction of emissions from soil is also necessary to meet the CCC balanced pathway recommendations. It is unclear how the government will successfully achieve emission reduction targets without a large push towards regenerative farming and reduction in harmful fertiliser use.

We support SCCS's statement that:

The apparent assumption, made in the indicative statement and elsewhere, that a reduction in livestock numbers would have “a detrimental impact on our agriculture sector and wider rural economy” is unproven. First, the overall value, profitability and employment rates in the agriculture sector are not related directly to livestock numbers – which have risen and fallen over the years. Indeed, some forms of extensive production, with fewer animals per hectare, can be as beneficial in economic terms as more intensive systems, yet are of considerably greater benefit in reducing emissions and improving biodiversity. Secondly, the agriculture sector is only part of the wider rural economy and, should part of this sector shrink, a just transition would imply the development of alternative opportunities – both in other land use sectors (forestry, conservation, etc) but also the wider economy (often enabled by the growth of online working).

Midlothian Climate Hub similarly believes that government should lead the transition of the agriculture sector to more sustainable food production, supporting livestock workers to obtain other secure and sustainable roles.

The Climate Hub also advocates for the Scottish Government to encourage diet change that include eating less meat products. This would support a reduction in livestock farming and people will need the support of the government to transition to a lower meat diet. One young person involved



with our member Seeds of Disruption said “I think the government should help by making a positive campaign for vegan or vegetarian meat substitutes. Increased plant consumption could cut down CO2 emissions” Similarly, one of our member advocated the government should offer improved education on eating healthy and sustainable food sources, and so encourage shifting towards a plant-based diet.

Finally, if the government is to successfully offset emissions by creating woodland and restoring peatland, land will be needed. Much of Scotland’s land is currently used for farming, a large portion of this being used for livestock farming, and so a reduction in livestock farming would aid the government in reaching these other woodland and peatland targets.

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

Disabled people will be particularly affected by the transition to net zero, as they are often left behind in most planning. Many plans and actions may not consider the needs of disabled people, particularly plans for education and green job training and active travel plans. It is vital that disabled people are included in the co-creation of local planning and implementation of climate change plan actions. Specifically, Handicabs Lothians states: Passengers using community transport who are unable to travel independently and who are already disadvantaged due to disability, mobility challenges and geographical remoteness will be particularly affected.

In a similar vein, the plan should include provisions for disabled people around car use and adaptable active travel, to ensure that disabled people are not inadvertently left behind and in fact, unable to travel, due to climate change plan actions.

Migrant and ethnic minority communities and working class communities are particularly prone to bearing the brunt of the economic instability



during transition, specifically workers in the oil and gas sector. As stated in questions 1 and 2, the Scottish government needs to ensure adequate funding and support to those out of work in a transition, and explore the possibility of universal basic income.

Finally, areas that are ex mining communities, that were previously harmed by an unjust transition, may feel particularly nervous about a climate transition, based on their previous experience.

The National Mining Museum States: “Mining communities often feel ostracised from climate change conversations due to the affiliation with mining and, indeed, their pride in being part of an industry that built Scotland and enabled the technological advances that we have today. While classed by many as a “dirty industry”, it is these mining communities who are arguable best situated to learn from our past industrial heritage in order to help shape Scotland’s energy of the future. We cannot allow their voices to be unheard.”

We support the mining museum’s statement, and as part of their work delivering a just transition the Scottish Government should consult mining communities to ensure not repeating previous mistakes.

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

We are answering this question based on how the Climate Change Plan aligns with the regional climate hubs. We support FFCAN & ELCAN response in terms of regional climate hub priorities:

Hubs operate on year-to-year funding cycles, often receiving budget confirmation late in the fiscal year. This creates a short delivery window that makes long-term planning impossible. We advocate for a minimum of five-year funding cycles. This would provide the stability needed for Hubs to build long-term local skills, maintain consistency, secure mixed funding



sources and successfully deliver complex community projects. Short-term funding leads to high staff turnover. It takes roughly six months for a new staff member to gain the necessary local policy expertise; the current model often sees them leaving just as they become effective due to contract uncertainty. While we recognise the Scottish Government operates within an annual settlement from the UK Government, we suggest the Scottish Government commit to a safe baseline of multi-year funding for the Hubs programme, with "top-up" options should additional funds become available.

### **Strengthening the scope and role of Hubs**

While Climate Hubs are essential for grassroots mobilisation, their current remit is too limited to achieve the scale of change required. Hubs currently lack the authority to actualise infrastructural changes in transport and agriculture. Supporting a network of Hubs must involve more than warm words; it requires robust financial support and a formal role in local infrastructure planning, for example a Community Planning Partnership. We recommend that collaboration be formally embedded into the Hub model. System change requires wealthy, resource-rich communities to share expertise and resources with struggling neighborhoods to ensure a fair transition for all

### **18. If you identified there could be negative impacts of the Climate Change Plan, are there any ways you think SG could reduce that negative impact and if so, what would you recommend?**

There is a potential for legislation around car travel and car usage having a strong negative impact on disabled people who need their car to travel. Access to electric vehicles is not always possible, as changing to a new electric vehicle can't be afforded by all and the infrastructure for charging is still underdeveloped in many parts of Scotland. Plans and policies should carefully consider the needs of disabled people and include exemptions from restrictions for those who need it, alongside support



schemes that will help them transition. This includes subsidized sustainable travel options for disabled people, such as increased funding to purchase electric vehicles if you are part of the blue badge scheme, and including more electric vehicles in the Motability scheme. This, however, needs to go side by side with an improvement to charging infrastructure, as otherwise disabled people with an electric car will still find themselves at a disadvantage.

This should also go beyond legal markers of disability. Many disabled people are not on the blue badge scheme or motability scheme but have disabilities that would prevent them from conventional active travel or require car use. Increasing the ease of access to active travel adaptations and bike adaptations would be vital to include disabled people who fall through the cracks. There is also a need to increase the ability to register as a disabled person who needs travel accommodations, as at the current moment there are many people who would not qualify for a blue badge or the motability scheme that are dependent on their car.

In planning of new transport work towards net zero, there should be a requirement to work with disabled people and advocacy groups in designing new policy, to ensure disabled people are properly included, similar to the way that the adult disability payment scheme was designed.

**30. What are the most appropriate indicators for judging whether SG 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.**

The participatory mechanisms are often long, time consuming and often gives people the impression that a baseline knowledge of the issue is required. Furthermore, people often feel disenfranchised in participating,



as they feel their voices are not heard. This sentiment can be seen in the comment of one of our community members that that “There is apathy about this because no one thinks they are being listened to. Please make it worth people's time if you wish a community to participate.”

For this reason, the planning process is biased against community voices in favour of those that have the time, resources and financial power to pay staff to do so, such as housing developers or other stakeholders with a profit drive. This leads to local community not feeling empowered and feeling it is not worth their time participating in planning, especially as time and time again they see decisions being made that go against the wishes of their members.

Indicators should take this in consideration and ensure community voices are taken seriously. Based on this and feedback from our members, this are some additional indicators that would be critical to ensure meaningful public participation:

- How many members of key minority groups, such as ethnic minority groups, disabled people, workers, and people from rural and island communities were consulted in these decisions
- The number of local community groups that were consulted and the numbers of individuals consulted, compared to the number of larger organization's and businesses consulted.
- The proportion of community groups and individuals' concerns that were addressed and/or implemented in the final plan.
- The proportion of those from most affected communities (e.g. ex oil and gas workers from sites such as Mossmorran) who feel the actions in the plan deliver for them. Did they feel able to contribute to the plan?