
NORTH AYRSHIRE COUNCIL

21 March 2023

Cabinet

Title:	Consultation on Scottish Government's draft Energy Strategy and Just Transition Plan
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Purpose:	To seek Cabinet approval for the proposed response to the consultation on the Scottish Government's draft Energy Strategy and Just Transition Plan.
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Recommendation:	That Cabinet approves the response attached as Appendix 1 as the North Ayrshire Council response to the Scottish Government consultation in relation to the draft Energy Strategy and Just Transition Plan.
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1. Executive Summary

- 1.1 The Scottish Government has launched a consultation on the Scottish Government's draft Energy Strategy and Just Transition Plan. This report sets out the Council's proposed consultation response.
- 1.2 The proposed response at Appendix 1 sets out broad support for the vision, wider policy statements and detailed actions underpinning them. The response also highlights a number of particular barriers for renewable energy projects that have been experienced recently, including issues of grid capacity, grid connection costs and timescales, and options for sale of energy.

2. Background

- 2.1 In January 2023, the Scottish Government published its draft 'Energy Strategy and Just Transition Plan'. The deadline for responses was recently extended and is 9 May 2023.
- 2.2 The Plan sets out policy positions and a route map of actions with a focus to 2030 to realise climate change ambitions. It recognises that there is a need to transform the way Scotland generates, transports, and uses energy in order to deliver a vision where by 2045 Scotland has a flourishing, climate friendly energy system that delivers affordable, resilient and clean energy supplies for Scotland's households, communities and business.
- 2.3 The document sets out a sector-by-sector approach to renewables, addressing fuel insecurity and other energy related matters, articulating ambitions to scale up generation across a range of technologies, along with reducing demand. The

strategy notes that there are matters not devolved and/or where co-ordination with UK Government will be required, such as electricity market reform and carbon capture and storage that will be critical components of the transition to net-zero.

2.4 The draft Plan has three overall aims for Scotland:

1. To scale up renewable energy production, helping to secure a just transition to net zero and reducing energy demand;
2. To support continued investment in green energy that delivers economic opportunities, including more jobs, new manufacturing capabilities and increased access to global markets and technologies for Scottish businesses and supply chains;
3. To deliver reliable, a more secure and affordable net zero energy system to protect from future energy price volatility.

2.5 To achieve these aims, the draft strategy route map includes the following key proposals:

- More than 20 GW of additional renewable electricity from on-and-offshore sources by 2030
- People have access to clean, affordable energy to reduce fuel poverty
- An ambition for hydrogen production to provide 5 GW or the equivalent of 15% of Scotland's current energy needs by 2030, increasing to 25 GW capacity by 2045
- Accelerated decarbonisation of domestic industry, transport and heat including one million homes decarbonised by 2030; and the establishment of a national public energy agency – Heat and Energy Efficiency Scotland
- The phasing out the need for new petrol and diesel cars and vans by 2032 and reduction in car kilometres travelled by 20% by 2030

2.6 The proposed response at Appendix 1 sets out broad support for the vision, wider policy statements and detailed actions underpinning them. The proposed response highlights a number of particular barriers for renewable energy projects that North Ayrshire Council has direct experience of, including grid capacity, grid connection costs and timescales, and options for sale of energy. The response also reinforces the evidence given previously through various channels such as the Convention of Scottish Local Authorities (COSLA), the Society of Local Authority Chief Executives (SOLACE) and the Sustainable Scotland Network (SSN) as part of the Net Zero Parliamentary enquiry, which has been reflected strongly in the recently published findings in relation to the need for:

- Increased funding for local authorities as a key delivery vehicle for net-zero
- Streamlining of the funding landscape
- Investment in grid capacity and simplifying of the process to unlock municipal energy opportunities

- Skills development and capacity

2.7 Subject to Cabinet approval, the response will be submitted to Scottish Government in advance of the deadline for responses of 9 May 2023.

3. Proposals

3.1 That Cabinet approves the response at Appendix 1 as the North Ayrshire Council response to the Scottish Government consultation in relation to the draft Energy Strategy and Just Transition Plan.

4. Implications/Socio-economic Duty

Financial

4.1 There is no direct financial impact arising from the content of this report.

Human Resources

4.2 There is no direct impact arising from the content of this report.

Legal

4.3 None

Equality/Socio-economic

4.4 There is no direct equality/socio-economic impact arising from the content of this report. However, if implemented the proposals in the consultation document could assist in meeting the Council's socio-economic duty as set out in the Fairer Scotland Duty and will help to create a fairer and more inclusive local economy.

Climate Change and Carbon

4.5 The proposals in the consultation document would make a positive contribution to:

- national carbon reduction targets, and
- to the North Ayrshire Council Climate Emergency declaration commitment to be carbon neutral by 2030

Key Priorities

4.6 The proposals in the consultation document may support the North Ayrshire Council Plan priorities:

- Active and strong communities
- Inclusive, growing and enterprising local economy
- A sustainable environment; and
- People enjoy good life-long health and wellbeing

Community Wealth Building

- 4.7 The proposals in the consultation document would support Community Wealth Building aims of creating a fairer local economy central to our aims of tackling climate change, poverty and inequality.

5. Consultation

- 5.1 A number of Council services were consulted and assisted in the preparation of the draft response.

RUSSELL McCUTCHEON
Executive Director (Place)

For further information please contact **David Hammond, Head of Sustainability, Corporate Property & Transport**, on 01294 324514.

Background Papers

1. Scottish Government's draft Energy Strategy and Just Transition Plan [Draft Energy Strategy and Just Transition Plan \(www.gov.scot\)](#)

North Ayrshire Council response to the Scottish Government’s draft Energy Strategy and Just Transition Plan – Consultation		Appendix 2
Question	Answer	
Chapter 1 – Introduction and Vision		
1. What are your views on the vision set out for 2030 and 2045? Are there any changes you think should be made?	<p>The Council welcomes and supports the Scottish Government’s vision to 2030, to reduce overall emissions by 75% (compared to 2019 levels), and by 90% by 2040.</p> <p>We also acknowledge the requirement to build Scotland’s renewable capacity and focus on decarbonising energy for heat, transport and industry, on reforming energy markets to ensure energy security and affordability, and on maximising benefits for the transition to net zero for economy and communities.</p> <p>We note the following ambitions to 2030/2045:</p> <ul style="list-style-type: none">• An energy system that provides maximum community and economic benefits on route to delivering net zero• 5GW hydrogen production• Oil and gas production reduced to 35% of 2019 levels (by 2035)• Increased level of renewables by a further 20GW• Reduced greenhouse gas emissions to 20MtCO2e• 2GW of community and locally owned energy• Phase out need for new petrol and diesel cars and vans• Equivalent of 50% of energy for heat, transport and electricity comes from renewable sources. <p>By 2045:</p> <ul style="list-style-type: none">• A net zero future – climate-friendly energy system provides affordable, clean energy to homes, businesses and communities. <p>As noted above, we broadly support the vision and Just Transition outcomes set out in the consultation paper, however, to ensure Scotland can achieve this vision it is crucial to address the structural and economic barriers to a just transition. We would like particularly to highlight the need for:</p> <ul style="list-style-type: none">• Increased funding for local authorities as a key delivery vehicle for net-zero• Streamlining of the external grant funding landscape• Investment in grid capacity, reduction of grid connection timescales and simplifying of the grid application process to unlock municipal energy opportunities• Skills development and capacity <p>North Ayrshire Council has set a carbon reduction target of achieving net zero area wide carbon emissions by 2030, and has set out a route map to achieve this in our third Environmental Sustainability & Climate Change Strategy (ESCCS). The strategy follows seven thematic workstreams (Affordable Warmth, A Green Economy, Transport & Travel, Natural Environment, Sustainable Operations, Carbon Absorption and Climate Change Adaptation) which align with the principles of the Draft Energy Strategy and Just Transition Plan. The fourth iteration of the ESCCS is in development, therefore we welcome the timing of this consultation to ensure local action supports nation ambition.</p>	
Chapter 2 – Preparing for a Just Energy Transition		

<p>2. What more can be done to deliver benefits from the transition to net zero for households and businesses across Scotland?</p>	<p>The Council welcomes the proposed benefits outlined in the plan, specifically to:</p> <ul style="list-style-type: none"> • Maximise the economic benefits, including a pipeline of skills for net zero jobs • Ensure fair distribution of opportunities, benefits and risks including community benefits, adapting to impacts of climate change • Ensure and inclusive and fair process via co-design with stakeholders, trade unions and public <p>We welcome the commitment to community benefits and consider that additional resource is required to support communities in utilising the funds and delivering support projects from feasibility to completion.</p>
<p>3. How can we ensure our approach to supporting community energy is inclusive and that the benefits flow to communities across Scotland?</p>	<p>In North Ayrshire, Locality Planning Partnerships are key to disseminating funds received through community benefits. Engagement with community groups to increase capacity and spread awareness of communities' roles in tackling climate change, and to identify where funding and resource to support implementation of projects, is needed. It would be helpful to identify best practice and share this amongst local authorities.</p>
<p>4. What barriers, if any, do you/your organisation experience in accessing finance to deliver net zero compatible investments?</p>	<p>We would like to highlight the role of public sector led renewable energy generation projects which have significant potential to make a major contribution in the journey to net-zero. Local authorities have access to land and buildings and the ability to raise capital on an invest to save basis and to be creative in power off-take opportunities, for example entering into a sleeving agreement to use the power supplied for their own estate, and/or supplying generated power to existing buildings or stimulating new development.</p> <p>A key barrier to unlocking this potential within local authorities and creating viable financial cases for investment is the lack of flexibility within nationally procured energy supply contracts to use the power generated in the most efficient way. See further information in the response to question six below.</p> <p>We are also of the view that timescales for external grant funding applications can be prohibitive, and the funding landscape could be streamlined to reduce complexity and widen the scope of eligible projects.</p>
<p>5. What barriers, if any, can you foresee that would prevent you/your business/organisation from making the changes set out in this Strategy?</p>	<p>We would welcome addition resource to implement action, not only within the Council but to support local businesses and communities.</p> <p>Some of the key challenges faced by local authorities are:</p> <ul style="list-style-type: none"> • Electricity grid capacity and timescales – at present there is limited spare capacity in some areas, the infrastructure is outdated and requires to be upgraded. The transition to Electric Vehicles and the decarbonisation of heat will significantly add to the electrical demand on the network and this will need to be addressed. The timescales for the application process to the grid is also prohibitive and puts pressure on the viability of business cases for renewable energy generation projects. • Workforce knowledge and expertise – the ability to fund, recruit and retain the skills necessary, with the latter being in short supply in the labour market. There is a need to significantly upskill workforce and increase their levels of expert resource to plan, develop, lead and drive change at the scale and pace required to reach the net zero targets. Emerging technologies such as hydrogen require expert knowledge. In addition, the latest global market volatility highlights the importance of energy market intelligence and analysis. • At present, the analysis of costs from current non-domestic projects is indicating that achieving enhanced levels of energy performance and sustainability, such as BREEAM Outstanding, Passivhaus and SFT – Net Zero Public Sector Buildings (NZPSB) standard, in order to meet net zero targets, are proving to be cost prohibitive. It is acknowledged the buildings we deliver need be more efficient, higher performing, net zero buildings if net zero is to be achieved however the costs associated with delivering this is a challenge. There are supply chain barriers too (cost, availability and understanding of technology) which need national solutions/incentives to overcome in order to mainstream Local, bespoke solutions will not work for all emission sources.
<p>6. Where do you see the greatest market and supply chain opportunities from the energy transition, both domestically and on an international scale, and how can the Scottish Government best support these?</p>	<p>Urgent action is needed to support local authorities in the uptake of emerging and existing large-scale renewable projects. Action is required to improve the national Supply of Electricity Framework as it does not allow for sleeving of electricity, even though utility companies do offer such an agreement outwith the framework. Requests to include the provision for sleeving have been repeatedly made to Scottish Procurement, prior to the forthcoming framework in 2024. This represents a barrier to local authorities pursuing large</p>

	<p>scale renewable projects, as it limits flexibility within business cases for off-take of the power. Furthermore, action is required to improve the electricity network to allow uptake of new solar farms and resource provided to DNOs to reduce the lead in time for grid connections. The National Grid and DNO element of our own solar farm developments is currently considered another barrier. In order to support increased capacity, the market needs to see what the demand map looks like, which is currently uncertain given all the challenges noted above re ambition, grid capacity, grid constraints etc.</p> <p>Consideration must also be given to biodiversity and embodied carbon when engaging with the market and supply chains.</p>
7. What more can be done to support the development of sustainable, high quality and local jobs opportunities across the breadth of Scotland as part of the energy transition?	We welcome the aspiration for Scottish Government to work collaboratively with existing oil and gas businesses, low carbon and renewable energy businesses, across further and higher education and with local authorities to maximise the potential of the energy industry and areas such as the North East and Shetland, however we would offer that the energy sector is encouraged to work with further and higher education to set out the skills required and courses available across Scotland.
8. What further advice or support is required to help individuals of all ages and, in particular, individuals who are currently under-represented in the industry enter into or progress in green energy jobs?	The energy sector could be encouraged to support the promotion of education and training opportunities, in partnership with Scottish Government. Engagement at secondary school level would be welcomed to motivate and inspire young people to pursue higher education and careers in renewable energy sector. This investment in the renewable energy sector would also support one of the 'Sustainable Development Goals'.
Chapter 3 – Energy supply	
Scaling up renewable energy	
9. Should the Scottish Government set an increased ambition for offshore wind deployment in Scotland by 2030? If so, what level should the ambition be set at? Please explain your views.	Current ambition to achieve 8-11GW of offshore wind by 2030, however there is capacity (operational, pipeline and potential pipeline) up to 43.66GW. The impact to marine biodiversity must be addressed when considering a revised target and when considering applications for potential offshore marine turbines.
10. Should the Scottish Government set an ambition for offshore wind deployment in Scotland by 2045? If so, what level should the ambition be set at? Please explain your views.	Yes, however robust consideration to marine biodiversity must be at the forefront of any planning decision.
11. Should the Scottish Government set an ambition for marine energy and, if so, what would be an appropriate ambition? Please explain your views.	<p>Yes, no one technology will provide Scotland's clean, affordable energy demand. Therefore, a mix of renewable sources is required. Wave and Tidal energy will require additional resource to support greater uptake. Furthermore, marine energy is highly predictable which will help balance the generation from more intermittence resources.</p> <p>Figure 17 in the consultation suggests the current operational wave and tidal systems have a capacity of 20MW, with 130MW awaiting construction, and a further 220MW in planning stage. However, the draft marine energy vision for Scotland indicates industry recommend a target of 40MW from tidal by 2027 and testing 4 wave convertors or 250kW each by 2027, which is a target supported by the Council and led by industry experts. We would welcome clarification on the proposed target.</p>
12. What should be the priority actions for the Scottish Government and its agencies to build on the achievements to date of Scotland's wave and tidal energy sector?	<p>Yes, to continue the Scottish Marine Energy Industry Working Group to help realise the proposed GVA opportunities for the UK (between £4.9billion and £8.9 billion by 2050), continue support for industry and academia, and maximise Scotland's position in the emerging global marine market, whilst protecting marine biodiversity.</p> <p> </p>

<p>13. Do you agree the Scottish Government should set an ambition for solar deployment in Scotland? If so, what form should the ambition take, and what level should it be set at? Please explain your views.</p>	<p>Yes, as no one technology should be relied on to support Scotland's clean, affordable energy demand. 411MW of solar are reported as being operational with an additional approx.770MW in the pipeline. However, urgent action is needed to support local authorities in the uptake of large-scale renewable projects such as solar farms. Action is required to improve the national Supply of Electricity Framework as it does not allow for sleeving of electricity, albeit utility companies do offer such an agreement, out with the framework. Requests to include the provision for sleeving have been repeatedly made to Scottish Procurement, prior to the forthcoming framework in 2024. This represents a barrier to local authorities pursuing large scale renewable projects, as maximum returns cannot be achieved to support business cases and nor will they be for the next 3-5years under the new framework. Furthermore, action is required to improve the electricity network to allow uptake of new solar farms and resource provided to DNO's to reduce the lead in time for grid connections. The National Grid and DNO element of solar farm development is currently considered another barrier. Consideration must also be given to the land use when considering large scale solar farm projects. North Ayrshire Council are currently developing two solar PV farm projects on former landfill sites and have first hand experience of the complexities relating to power purchase agreements and grid connections.</p>
<p>14. In line with the growth ambitions set out in this Strategy, how can all the renewable energy sectors above maximise the economic and social benefits flowing to local communities?</p>	<p>We would welcome greater clarity on the non-domestic rates exemption linked to community benefit. Having engaged with the Scottish Assessors regarding this element, there remains uncertainty over eligibility. This would support the inclusion of a community fund provision for large scale renewable developments, which could be used to support fuel poverty and low carbon projects in communities and schools. Clear guidance on eligibility would be welcomed.</p>
<p>15. Our ambition for at least 5 GW of hydrogen production by 2030 and 25 GW by 2045 in Scotland demonstrates the potential for this market. Given the rapid evolution of this sector, what steps should be taken to maximise delivery of this ambition?</p>	<p>Delivery of the Scottish Hydrogen Action Plan to achieve this target of 5GW of hydrogen (15% of Scotland's energy demand). The action plan sets out actions that will be taken over the next five years to support the development of a hydrogen economy while ensuring a just transition. The commitment is to:</p> <ul style="list-style-type: none"> • Invest in early projects, encouraging public and private sector to work together to demonstrate these technologies as much of the learning takes place before a single molecule of hydrogen is even produced • Build relationships, gaining valuable knowledge of how to work with others to assess, approve, consent and regulate these projects, as well as to address deployment constraints and challenges, including high production costs • Mobilise investment, continuing to support projects on the journey to decarbonisation. <p>The plan states that £100 million of funding has been made available for renewable hydrogen projects, and we welcome the acknowledgement of the hierarchy for hydrogen use in order to help to decarbonise sectors which are difficult to electrify and playing a key role in energy-intensive industry. We acknowledge the level of existing natural gas infrastructure which has significant potential for re-purposing.</p> <p>We further support the Scottish Government's statement regarding no new hydrogen production will be supported where CO₂ is unabated, however would welcome further clarity on the implication for private sector projects which are not supported by Scottish Government funding. Investment needs to be focussed on green hydrogen, therefore we support the opposition to continued use of unabated fossil fuels to generate electricity. The Local Development Plan may have a role to play in supporting this ambition at a local level.</p>
<p>16. What further government action is needed to drive the pace of renewable hydrogen development in Scotland?</p>	<p>Continued engagement with academia and industry. As a local authority with high net zero ambition, we would welcome the opportunity to maximise uptake of affordable green hydrogen and supporting infrastructure. We have engaged with Strathclyde University on this, however there is perhaps a role for Sustainable Scotland Network to support learning across local authorities, particularly for those more rural. Consideration is needed for Council housing stock and the long-term plans for heat decarbonisation, and further guidance would be welcomed on a just transition from gas to hydrogen.</p>
<p>17. Do you think there are any actions required from Scottish Government to support or steer the appropriate development of bioenergy?</p>	<p>Yes, and we welcome the review to scale up domestic biomass supply chains, with the support of a Bioenergy Policy Working Group. In addition, we welcome the announcement that a strategic framework for the most appropriate use of bio-resources will be published in the Bioenergy Action Plan.</p>

18. What are the key areas for consideration that the Scottish Government should take into account in the development of a Bioenergy Action Plan?	The key consideration here is our biodiversity and protecting our natural environment. We welcome the aim of using bioenergy only where it can be most effective in reducing emissions and where there is greatest need for alternatives to fossil fuels. We also support the longer-term vision of the use of bioenergy with carbon capture technology where possible.
19. How can we identify and sustainably secure the materials required to build the necessary infrastructure to deliver the energy strategy?	Sustainable procurement, life cycle analysis and embodied carbon should all be considered. Equally as important is bringing local authorities on the journey, utilising the Sustainable Scotland Network and Scottish Energy Officers Network to engage with, support and encourage local authority officers to deliver ambitions at local levels.
North Sea Oil and Gas	
20. Should a rigorous Climate Compatibility Checkpoint (CCC) test be used as part of the process to determine whether or not to allow new oil and gas production?	N/A
21. If you <u>do</u> think a CCC test should be applied to new production, should that test be applied both to exploration and to fields already consented but not yet in production, as proposed in the strategy?	N/A
22. If you <u>do not</u> think a CCC test should be applied to new production, is this because your view is that:	N/A
<ul style="list-style-type: none"> • Further production should be allowed without any restrictions from a CCC test; • No further production should be allowed [please set out why]; • Other reasons [please provide views]. 	N/A
23. If there is to be a rigorous CCC test, what criteria would you use within such a test? In particular [but please also write in any further proposed criteria or wider considerations]	N/A
<ul style="list-style-type: none"> • In the context of understanding the impact of oil and gas production in the <i>Scottish North Sea</i> specifically on the <i>global</i> goals of the Paris Agreement, should a CCC test reflect – 	N/A
A) the emissions impact from the production side of oil and gas activity only;	N/A
B) the emissions impact associated with both the production and consumption aspects of oil and gas activity (i.e. also cover the global emissions associated with the use of oil and gas, even if the fossil fuel is produced in the Scottish North Sea but exported so that use occurs in another country) – as proposed in the Strategy;	N/A
C) some other position [please describe].	N/A
<ul style="list-style-type: none"> • Should a CCC test take account of energy security of the rest of the UK or European partners as well as Scotland? If so, what factor would you include in the assessment, for example should this include the cost of alternative energy supplies? 	N/A

<ul style="list-style-type: none"> Should a CCC test assess the proposed project's innovation and decarbonisation plans to encourage a reduction in emissions from the extraction and production of oil and gas? 	N/A
<ul style="list-style-type: none"> In carrying out a CCC test, should oil be assessed separately to gas? 	N/A
24. As part of decisions on any new production, do you think that an assessment should be made on whether a project demonstrates clear economic and social benefit to Scotland? If so, how should economic and social benefit be determined?	N/A
25. Should there be a presumption against new exploration for oil and gas?	N/A
26. If you do think there should be a presumption against new exploration, are there any exceptional circumstances under which you consider that exploration could be permitted?	N/A
Chapter 4 Energy demand	
Heat in Buildings	
27. What further government action is needed to drive energy efficiency and zero emissions heat deployment across Scotland?	<p>The Council welcomes the ambition that by 2030 Scotland's main energy using sectors will use energy more efficiently, and that what is used will be decarbonised. We also support the ambitious targets set across buildings, transport, industry, and agriculture. We recognise the need for carbon capture, utilisation and storage (CCUS) to be developed and welcome the continued support provided to industry.</p> <p>It is noted that Scottish Government do not consider that hydrogen will play a central role in decarbonising heat. This is an important declaration and provides clarity for local authorities on decarbonising heat in housing stock. However, challenges remain in terms of the capital costs of alternative low carbon technology, alongside maintenance and operation costs, as well as fabric investments required to ensure the efficiency of such technology can be achieved. Local authorities have significant domestic and non-domestic estates and financial support will be required to fund the transition to net-zero/ZDE emissions in buildings.</p> <p>The Council has undertaken two LHEES pilot projects and is currently developing the 1st mandatory LHEES and Delivery Plan. This has been made possible by the resource funding provided by Scottish Government, not only to help produce the report but to allow for job creation in the form of a temporary LHEES officer post, to achieve the agreed outcomes from the LHEES. This level of financial support is gratefully received, allowing limited resource to be well positioned to fulfil other zero carbon objectives simultaneously.</p> <p>In addition, sharing best practice, guidance and practical support through existing networks such as the Sustainable Scotland Network, or Scottish Energy Officer Network, would be helpful.</p>
Energy for transport	
28. What changes to the energy system, if any, will be required to decarbonise transport?	The two key alternative fuels currently in the marketplace for road transport vehicles are electricity or hydrogen, the production and distribution of both fuel types must be readily available within the appropriate geographical logistical areas to make the transition a success, alongside provision of financial support for local authorities to meet the increased capital cost associated with alternative fuel vehicles.
29. If further investment in the energy system is required to make the changes needed to support decarbonising the transport system in Scotland, how should this be paid for?	We recognise that there is a role for the private sector to leverage in investment, where this is viable. Where it is not viable, public intervention will be required. An example is the Electric Vehicle Infrastructure Fund, that North Ayrshire is actively developing an application for, and which is designed to stimulate private sector investment in net-zero. We consider that for heavier vehicle fleet, hydrogen is likely to be a more viable solution, and significant investment in vehicles, hydrogen generation, distribution and fuelling

	infrastructure will be required and initially this is only likely to come from public funding in the early stages (as has been the case for electric vehicle charging infrastructure).
30. What can the Scottish Government do to increase the sustainable domestic production and use of low carbon fuels across all modes of transport?	As above.
31. What changes, if any, do you think should be made to the current regulations and processes to help make it easier for organisations to install charging Infrastructure and hydrogen/low carbon fuel refuelling infrastructure?	North Ayrshire Council are participating in one of Transport Scotland's six EV Infrastructure Pathfinder projects, supported by the Scottish Futures Trust, to determine alternative models to support the growth of EV infrastructure. The results of the pathfinder project should be used to support changes in processes to make it easier for local authorities to provide charging infrastructure for EV users across Scotland.
32. What action can the Scottish Government take to ensure that the transition to a net zero transport system supports those least able to pay?	There is a need to provide additional financial support for the procurement of alternative fuelled vehicles due to their current higher cost or introduce new policy levers to bring the cost of alternative fuelled vehicles to make them comparative to fossil fuel counterparts.
33. What role, if any, is there for communities and community energy in contributing to the delivery of the transport transition to net zero and, what action can the Scottish Government take to support this activity?	<p>Community (renewable) energy can help to decarbonise the UK's energy system by generating low carbon electricity that feeds into the electricity grid. Community renewable energy generation can help meet increasing electricity demand caused by the electrification of transport.</p> <p>The electrification of transport will increase electricity demand significantly. Climate Change Committee estimates by 2050 EVs are expected to introduce an additional 65-100TWh of annual electricity demand to the system, or an increase of 20-30% over today's levels ('Enabling the transition to electric vehicles: the regulator's priorities for a green fair future', OFGEM, 2021)</p> <p>Community energy projects can also increase resilience and reliability of electricity supply.</p>
34. Electric vehicle batteries typically still have around 80% of their capacity when they need replacing and can be used for other applications, for example they can be used as a clean alternative to diesel generators. What, if anything, could be done to increase the reuse of these batteries in the energy system?	Provide further promotion and case studies on future application.
Energy for agriculture	
35. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the agricultural sector to decarbonise energy use?	N/A
Energy for Industry	
36. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the development of CCUS in Scotland?	<p>It is important to note achieving net zero emissions requires a combination of reduction of emissions generated and the removal of residual emissions and therefore a clear plan to remove these residual emissions is required.</p> <p>We strongly agree that carbon capture, utilisation and storage will be essential for capturing residual emissions in our energy system and that CCUS will play a role in reducing emissions in hard to decarbonise industrial sectors that cannot electrify their industrial processes. Therefore, we believe further work should focus on advancing CCUS technologies. So CCUS could be deployed at a large scale, however, it needs to become investable in the short term.</p>

37. How can the Scottish Government and industry best work together to remove emissions from industry in Scotland?	As stated above.
38. What are the opportunities and challenges to CCUS deployment in Scotland?	As stated above.
39. Given Scotland's key CCUS resources, Scotland has the potential to work towards being at the centre of a European hub for the importation and storage of CO2 from Europe. What are your views on this?	As stated above.
Chapter 5: Creating the conditions for a net zero energy system	
40. What additional action could the Scottish Government or UK Government take to support security of supply in a net zero energy system?	Improvements to the electricity grid and support for local authority ambition through nationally procured frameworks.
41. What other actions should the Scottish Government (or others) undertake to ensure our energy system is resilient to the impacts of climate change?	Having begun our journey through Adaptation Scotland's Capability Framework in 2022/23, we would recommend undertaking this process to improve resilience at a local level. Moreover, having an energy system consisting of various renewable technologies rather than relying on a single source, will support sustained energy provision.
Chapter 6: Route map to 2045	
42. Are there any changes you would make to the approach set out in this route map?	No changes, the route map is a robust visual representation, and sets out a clear path to 2045.
43. What, if any, additional action could be taken to deliver the vision and ensure Scotland captures maximum social, economic and environmental benefits from the transition?	N/A
Impact assessment questions	
44. Could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic? These include age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief.	We welcome the development of a series of impact assessments. We acknowledge that there will be a finalised policy position based on conclusion of this process.

45. Could any of the proposals set out in this strategy have an adverse impact on children's rights and wellbeing?	As stated above.
46. Is there any further action that we, or other organisations (please specify), can take to protect those on lower incomes or at risk of fuel poverty from any negative cost impact as a result of the net zero transition?	Potential impact of increased operational costs from changing from gas heating to renewables.
47. Is there further action we can take to ensure the strategy best supports the development of more opportunities for young people?	Ensuring continued engagement with young people.
Just Transition energy outcomes	
48. What are your views on the approach we have set out to monitor and evaluate the Strategy and Plan?	This approach seems robust.
49. What are your views on the draft Just Transition outcomes for the Energy Strategy and Just Transition Plan?	<p>We broadly support the vision, wide policy statements and Just Transition outcomes set out in the consultation paper.</p> <p>However, to ensure Scotland can achieve this vision it is crucial to address the structural and economic barriers to a just transition. We would like particularly to highlight the need for:</p> <ul style="list-style-type: none"> • Increased funding for local authorities as a key delivery vehicle for net-zero. • Streamlining of the funding landscape. • Investment in grid capacity and simplifying of the process to unlock municipal energy opportunities. • Skills development and capacity.
50. Do you have any views on appropriate indicators and relevant data sources to measure progress towards, and success of, these outcomes?	<p>We would welcome a combination of social, economic, and environmental indicators to track progress towards achieving a just transition in Scotland, such as:</p> <ul style="list-style-type: none"> • Overall carbon emissions (tonnes) per capita • Renewable electricity: Installed Capacity • Total final energy consumption • Percentage of households in fuel poverty • Percentage of working age population in employment (Employment Rate) • Workforce jobs by industry