

Agenda Item	6.
Report No	CCC/3/26

The Highland Council

Committee: Climate Change

Date: 28 January 2026

Report Title: Scotland's Draft Climate Change Plan 2026–2040 - Consultation

Report By: Assistant Chief Executive - Place

1 Purpose/Executive Summary

- 1.1 The purpose of this report is to update Members on The Highland Council's response to the Scottish Government consultation on *Scotland's Draft Climate Change Plan 2026–2040*.
- 1.2 This report sets out the response which Members of the Climate Change Committee have been involved in shaping in line with the Committee's strategic position on climate change mitigation, adaptation, and delivery in the Highlands.
- 1.3 The consultation responses received from local authorities, stakeholders, and the wider public will inform the development of the final Climate Change Plan, which is expected to be laid before the Scottish Parliament in 2026.

2 Recommendations

- 2.1 Members are asked to **agree** the Council's response to the consultation on *Scotland's Draft Climate Change Plan 2026–2040* as detailed within Appendix 1.

3 Implications

- 3.1 **Resource** - There are no immediate resource implications arising directly from this report. However, the scale and ambition of the Draft Climate Change Plan will have significant long-term resource implications for local authorities, particularly in relation to infrastructure investment, service delivery, and workforce capacity.

- 3.2 **Legal** - There are no immediate resource implications arising directly from this report. However, the scale and ambition of the Draft Climate Change Plan will have significant long-term resource implications for local authorities, particularly in relation to infrastructure investment, service delivery, and workforce capacity.
- 3.3 **Risk** - There are no risks arising directly from this report. However, insufficient alignment between national policy ambition and local delivery capacity may present future delivery risks.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** – There are no health and safety implications arising directly from this report.
- 3.5 **Gaelic** - There are no Gaelic implications arising from this report.

4 Impacts

- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children’s Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 This is a monitoring and update report and therefore an impact assessment is not required.

5 Overview of Scotland’s Draft Climate Change Plan 2026–2040

- 5.1 The Climate Change (Scotland) Act 2009 requires Scottish Ministers to prepare a Climate Change Plan setting out the policies and proposals for meeting statutory emissions reduction targets. The Draft Climate Change Plan 2026-2040 covers the period of Scotland’s carbon budgets from 2026 to 2040 and sets out the pathway towards achieving net zero emissions by 2045.
- 5.2 The Draft Plan outlines a sector-based approach to emissions reduction, covering buildings, transport, waste, energy supply, industry, agriculture, and land use. It also places strong emphasis on delivering a just transition, securing economic opportunities, addressing biodiversity loss, and adapting to the impacts of climate change that are already locked in.
- 5.3 The response has been written with feedback from Members’ of the Climate Change Committee which is reflected within the submission documented in Appendix 1.

6 Implications to the Council

- 6.1 The final Climate Change Plan 2026–2040 will have wide-ranging implications across Council services, particularly in relation to decarbonisation of buildings and transport, energy infrastructure, land use, adaptation planning, and community resilience. Effective delivery will require close alignment between national policy, funding mechanisms, and local authority capacity.

Designation: Assistant Chief Executive - Place

Date: 10 January 2026

Author: Neil Osborne, Climate Change & Energy Team Manager

Background Papers: None

Appendices: Appendix 1 - Highland Council Draft Response – Scotland's Draft Climate Change Plan 2026-2040

Scottish Government Draft Climate Change Plan Consultation Questions

Supporting documents - Scotland's Climate Change Plan – 2026-2040 - gov.scot

Section 1: Delivering a Just Transition

The following questions concern the Delivering a Just Transition section of the Plan, more specifically: communities, skills, workforce, employers and adapting to climate change.

Question 1: What are your views on our approach to delivering a just transition for people and communities?

Highland Council supports the central role of a just transition within Scotland's Draft Climate Change Plan and welcomes the way just transition considerations are embedded across each thematic area of the Plan. The Council particularly welcomes the explicit underpinning of the Plan by Scotland's statutory just transition principles and the continued role of the Just Transition Commission in scrutinising and advising on delivery.

The Council recognises that the approach set out in the Draft Climate Change Plan reflects a mature and well-integrated just transition framework. The ongoing influence of the Just Transition Commission, including its contribution to the National Just Transition Planning Framework and the development of dedicated Just Transition Plans for specific sectors, sites and regions, provides a strong foundation for delivering net zero in a way that is fair, inclusive and maximises social and economic benefit.

Highland Council's own Net Zero Strategy adopts a similarly place-based approach, recognising that communities across the Highlands will play a critical role in delivering national climate ambitions, including hosting nationally significant energy generation, grid infrastructure and land-based interventions. Maintaining public confidence in the transition will depend on these communities seeing clear, tangible and enduring benefits from the change they are being asked to support.

The Council welcomes the Plan's emphasis on workforce development, skills and employer engagement as essential components of a just transition. The Highlands has significant potential to support high-quality employment across renewable energy, grid infrastructure, heat decarbonisation, transport, retrofit, land management and adaptation. Realising this potential will require long-term programme certainty and sustained investment in regional skills capacity. Short-term or fragmented funding approaches risk undermining workforce development and employer confidence, particularly in rural and island areas.

Affordability remains a central just transition issue. In the Highlands, off-gas housing, long travel distances and exposure to electricity pricing create heightened risk of unequal impacts if enabling measures are not aligned. Without coordinated action on energy pricing, infrastructure investment and targeted support, there is a risk that existing inequalities could be exacerbated, despite strong local support for climate action.

The Council also welcomes the integration of adaptation within the just transition framework. Communities across the Highlands are already experiencing the impacts of

climate change, including flooding, coastal erosion and risks to infrastructure. A just transition must therefore support both decarbonisation and resilience.

Overall, Highland Council considers the Draft Climate Change Plan's approach to delivering a just transition to be well structured, comprehensive and aligned with its own strategic priorities. However, successful delivery will depend on how effectively this national framework is translated into locally resourced, place-based action, with local authorities appropriately empowered as long-term delivery partners and communities clearly benefiting from the transition they are helping to deliver.

Question 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?

Highland Council considers skills, training and qualifications to be fundamental to delivering a just transition and welcomes the Draft Climate Change Plan's recognition of workforce development as a core enabling factor. For regions such as the Highlands, where net zero delivery will be infrastructure, land use and community-intensive, skills provision must support both immediate delivery needs and long-term social and economic resilience.

A key priority is the development of adaptation and resilience skills. As climate impacts are already being experienced across the Highlands, there is a growing need for skills that improve personal, organisational and community resilience, both at home and at work. This includes supporting businesses and communities to understand climate risks and to develop and implement resilience plans, procedures and response measures.

The Council also emphasises the importance of green skills aligned to future and emerging sectors. This includes skills linked to the circular economy, renewable energy, grid infrastructure, peatland restoration, woodland creation, nature-based solutions and low-carbon construction. Targeted investment in these areas would help capitalise on green job opportunities while supporting regional economic diversification.

Empowering young people is particularly important. Education and training pathways should embed climate literacy and sustainability from an early stage, through schools and further and higher education. Initiatives that support learning for sustainability, place-based education and programmes such as Powering Futures can play a critical role in building awareness, skills and aspiration, while strengthening local pathways into green careers.

In addition, the Council considers it essential that general skills and professional development embed climate considerations into everyday roles and decision-making. Realising the principle that "every job is a climate job" requires training that supports staff across all sectors to understand climate impacts, emissions reduction and adaptation within their own areas of responsibility, including within the public sector. Finally, access to training must be inclusive. Training opportunities should be available to people of all ages and career stages, and be accessible geographically, financially and in their mode of delivery. Flexible learning models, local provision and support for in-work upskilling will be particularly important in rural and island communities and for small and medium-sized employers.

Overall, Highland Council supports the direction of travel set out in the Draft Plan but considers that skills provision will need to be long-term, place-based and inclusive, with stronger alignment between education, workforce planning and local delivery

programmes to ensure that the skills required for net zero are available where and when they are needed.

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

Highland Council considers that employers across the private, public and third sectors will be central to delivering a just transition and to securing the economic opportunities associated with net zero. Effective support must therefore focus on skills and education, funding, and enabling infrastructure, delivered in a coordinated and place-based way.

Skills, training and education are a primary requirement. Employers need access not only to sector-specific technical skills, but also to broader training that supports business development, innovation and diversification in response to net zero. This includes skills to harness opportunities in the circular economy, low-carbon technologies, nature-based solutions and climate adaptation, as well as training that supports emissions reduction across existing business operations. Education and training provision should be developed in partnership with employers and delivered through accessible, flexible models that reflect rural and island contexts.

The Council also emphasises the importance of business support and advisory services. Employers, particularly small and medium-sized enterprises, will benefit from coordinated engagement with organisations such as Business Gateway, Chambers of Commerce, regional economic partners and the third sector. Joined-up support can help businesses understand net zero requirements, identify commercial opportunities, and navigate funding and regulatory frameworks.

Funding is a critical enabler. Many employers face significant upfront costs in transitioning to low-carbon processes, technologies and business models. Highland Council considers that financial support should prioritise grants over loans wherever possible, particularly for small businesses and third sector organisations, to avoid creating additional financial risk. Long-term funding certainty and clear eligibility criteria are essential to support investment and planning.

Infrastructure readiness is also fundamental. Employers' ability to decarbonise and innovate is directly influenced by access to grid capacity, low-carbon heat, transport connectivity and digital infrastructure. Coordinated infrastructure planning and timely investment are therefore essential to enable employers to participate fully in the transition and to retain economic value within local communities.

Overall, Highland Council considers that employers will be best supported through an integrated approach that combines accessible skills and education, practical business support, appropriate financial incentives and enabling infrastructure. This approach will help employers not only to reduce emissions, but also to seize the economic and social benefits of net zero, strengthening regional resilience and community wealth in the Highlands.

Question 4: What are your views on our approach to supporting places where the transition presents particular regional impacts?

Highland Council welcomes the Draft Climate Change Plan's acknowledgement that the transition to net zero will have uneven regional impacts and supports the principle

of place-based delivery. The Council also welcomes the stated intention to bring forward a forthcoming Rural Delivery Plan and National Islands Plans, which are expected to outline how the Scottish Government will support a fair, inclusive and place-based transition for rural and island communities.

However, in the absence of detail on these forthcoming plans, it is difficult to fully assess how the Draft Climate Change Plan will support regions such as the Highlands, where the scale and nature of transition impacts differ significantly from urban and industrial areas. While the Plan provides detailed focus on Grangemouth and the North East, there is comparatively limited consideration of the Highlands, despite its role as a centre for renewable energy generation and its exposure to the challenges of rurality, remoteness and infrastructure constraint.

The Council is particularly concerned about the absence of a clear and explicit focus on community renewables and local energy resilience within the Draft Plan. The Highlands has significant opportunity for community-scale renewable generation, storage and local energy systems that can reduce reliance on extensive transmission infrastructure, improve resilience to climate impacts, and support a just transition through fairer access to energy and more affordable pricing. These opportunities are especially important for remote, rural and island communities.

At present, Highland communities face some of the highest electricity costs in the UK, despite hosting a disproportionate share of Scotland's renewable energy generation. This disparity presents a clear just transition challenge and risks undermining public confidence in the transition unless addressed through targeted regional action, including local energy solutions, market reform and fairer pricing outcomes for energy-exporting regions.

Overall, Highland Council supports the intention to adopt a place-based approach to regional impacts but considers that the Draft Climate Change Plan would benefit from stronger and more explicit recognition of the Highlands and similar regions. Clearer articulation of how rural and island communities will be supported—particularly through community renewables, energy resilience and fair pricing—will be essential to ensuring that the transition is genuinely just and delivers tangible benefits to the places experiencing its greatest impacts.

Section 2: Sectoral contributions, policies and proposals

The following questions concern the Sectoral contributions, policies and proposal sections of the Plan.

Question 5: Buildings (Residential and Public): How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?

Highland Council considers that decarbonising homes and public buildings in a fair and inclusive way requires an approach that explicitly reflects the region's geography, climate, rurality, energy infrastructure constraints and socio-economic diversity. A just transition is essential to ensure that residents—particularly those in remote rural and island communities and low-income households—are supported to adopt low-carbon technologies and energy efficiency measures without disproportionate cost, complexity or risk.

A place-based approach is fundamental. The Highlands contains a high proportion of older, off-gas and non-traditional properties, many of which require tailored retrofit

solutions rather than standardised interventions. Local Heat and Energy Efficiency Strategies (LHEES) provide the appropriate framework to plan short-, medium- and long-term decarbonisation pathways that reflect local building stock, infrastructure capacity and community needs, and should be further embedded and supported as the primary delivery mechanism.

A tailored approach is required for listed buildings and properties within conservation areas to ensure they are not left behind in the transition. These properties often face higher costs, longer delivery times and additional complexity due to planning and building control requirements. Current permitted development and fabric standards do not always adequately support appropriate retrofit solutions for historic buildings, and there are no specific grant uplifts reflecting these additional costs. Given the prevalence of historic and listed properties in the Highlands, failure to address these barriers at scale risks excluding entire communities from the transition. A review of planning regulations, funding criteria and technical guidance is therefore required to ensure a fairer and more practical route to decarbonisation.

Affordability must remain central. Highland fuel poverty rates are significantly higher than the Scottish average, and there is a real risk that decarbonisation could increase energy bills if poorly designed. It is essential that the transition supports the alleviation of fuel poverty rather than exacerbating it. This requires enhanced grant support for fuel poor and extreme fuel poor households; targeted uplifts for remote and island communities where costs are higher; and a redesign of funding mechanisms so that support is based on outcomes and benefits delivered, such as carbon reduction, resilience and fuel poverty alleviation, rather than property characteristics alone.

The Council is also concerned about the availability of skilled and accredited contractors, particularly in rural and island areas, where travel distances significantly affect cost and delivery capacity. There is a clear need to develop rural-specific retrofit pathways, alongside sustained investment in training for insulation, retrofit and clean heat installation. Training must be geographically accessible, affordable and aligned with clear national delivery timelines to build robust local supply chains and installer capacity.

For public buildings, Highland Council considers that existing funding mechanisms are insufficient to deliver change at the scale required. Current schemes are often time-limited, competitive and lack multi-year certainty, with unrealistic timescales for bid development and delivery. Without reform, these funding models will systematically disadvantage large, rural authorities such as Highland, where project scale, procurement timelines and grid constraints make rapid delivery unachievable. Increased, stable and multi-year funding for public sector decarbonisation is essential to enable meaningful progress without diverting resources from frontline services.

Infrastructure readiness is another critical factor. Grid capacity constraints in the Highlands are a major blocker to electrification of heat and wider building

decarbonisation. Grid upgrades for rural and off-gas areas must be prioritised, alongside support for heat networks and local energy solutions where appropriate.

Finally, effective decarbonisation requires clear communication and public confidence. Increased investment in public awareness campaigns, accessible guidance, case studies and trusted local networks is needed to support households and organisations to navigate available support and make informed decisions.

Overall, Highland Council considers that decarbonising buildings fairly will require a locally led, well-resourced and flexible approach that prioritises affordability, recognises regional diversity, addresses infrastructure constraints and ensures that no household or community—particularly those already facing disadvantage—is left behind in the transition to net zero.

Question 6: Buildings (Residential and Public); How can clean heating systems (such as heat pumps) be made more affordable for everyone?

Highland Council considers that improving the affordability of clean heating systems is essential to delivering a fair transition and ensuring widespread uptake, particularly in regions such as the Highlands where off-gas properties, colder climates, higher installation costs and electricity pricing create additional challenges.

A critical factor in affordability is the cost of electricity. Current electricity prices risk undermining the financial case for electric-based clean heating systems, including heat pumps, and can result in higher running costs compared to fossil fuel alternatives. Action by both the Scottish and UK Governments to reduce the cost of electricity is therefore essential. Without action to rebalance electricity pricing, there is a significant risk that households in regions such as the Highlands will be penalised for switching to clean heating, undermining public confidence and just transition objectives. Lower electricity prices would act both as a clear incentive to switch and as a means of ensuring that households do not face higher ongoing energy bills as a result of decarbonisation.

Reducing upfront costs is equally important. Clean heating systems often require significant capital investment, particularly where homes need associated fabric upgrades. Highland Council strongly supports a fabric-first approach, ensuring buildings are energy efficient before or alongside the installation of clean heating systems. This requires increased grant funding and subsidies for insulation and energy efficiency measures, alongside direct support for the installation of clean heating technologies. Funding mechanisms should prioritise grants over loans, particularly for low-income, fuel poor and extreme fuel poor households, and consider options to reduce interest rates where loans are used.

Affordability is also closely linked to feasibility and delivery capacity. In the Highlands and Islands, limited access to skilled and accredited installers, long travel distances and higher mobilisation costs can significantly increase installation and maintenance costs. Supporting the expansion of local contractor capacity through targeted training, incentives and rural delivery uplifts will be essential to reducing costs and improving confidence in clean heating solutions.

In addition, funding and support mechanisms should better reflect the true cost of delivery in rural and island areas, including enhanced uplifts where installation, grid connection or maintenance costs are higher. Without this, there is a risk that clean heating will remain inaccessible to many households, undermining just transition objectives.

Overall, Highland Council considers that clean heating systems can be made more affordable through a combination of lower electricity prices, increased and better-targeted grant support, reduced upfront costs, a strong fabric-first approach and sustained investment in local delivery capacity. Without these measures working together, the transition to clean heating will disproportionately affect households in rural, island and off-gas communities.

Question 7: Transport: Which of the following would be most effective in enabling you to transition your vehicle(s) to zero emissions alternatives?

Please rank your choices from highest to lowest priority, where 1 is the highest priority and 8 is the lowest. Please only give one ranking to each option.

Option	Rank (1-8)
a) Cost of new zero emissions vehicles needs to come down	4
b) Cost of used zero emissions vehicles needs to come down	5
c) Reliable infrastructure for vehicles (such as fuel or charging networks)	1
d) Noticeably cheaper running costs (including electricity, maintenance and insurance)	3
e) Convenient access to public charging infrastructure	2
f) Ensuring an adequate number of trained mechanics available to perform essential maintenance and repairs	7
g) Access to funding support/low-cost finance	6
h) Other (use box below)	8

Highland Council considers that the most significant barriers to transitioning to zero-emission vehicles in regions such as the Highlands are infrastructure reliability, affordability and policy coherence.

Reliable charging infrastructure is the highest priority. In rural and island areas, confidence in vehicle range and charging availability is critical, given long travel distances and limited alternatives. Coverage alone is insufficient; charging infrastructure must be reliable, well-maintained and supported by adequate grid capacity to enable consistent use.

Affordability remains a major constraint. While vehicle purchase costs are important, ongoing running costs—particularly electricity prices—are increasingly influential. High electricity costs risk undermining the economic case for EVs, especially for households already facing higher transport and energy costs due to rurality.

The Council also wishes to highlight concerns regarding policy signals that risk discouraging uptake. The planned introduction of electric vehicle excise duty (eVED) from April 2028 risks sending mixed messages to consumers at a critical stage in the transition. Evidence from international experience suggests that introducing such measures too early can slow adoption. For example, EVs account for approximately 60% of vehicles on the road in Iceland, where similar measures operate in a more mature market, whereas EV penetration in the UK remains around 5%. In New Zealand, where EV adoption is comparable to the UK, data indicates that EV uptake has plateaued following the introduction of eVED in April 2024. There is a risk that similar outcomes could occur in the UK if fiscal measures are introduced before the market is sufficiently established.

Finally, while access to trained mechanics is currently ranked lower, it remains an important enabling factor, particularly in rural areas where maintenance options are limited. Investment in training and upskilling will be necessary to support long-term confidence in zero-emission vehicles.

Overall, Highland Council considers that accelerating the transition to zero-emission vehicles will depend on reliable and accessible infrastructure, genuinely lower running costs, and consistent policy signals that support consumer confidence, particularly in rural and island communities where transport options are more limited.

Question 8: Transport: How can the Scottish Government support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?

Highland Council considers that effective community participation in planning local sustainable transport infrastructure must be recognised as a two-way process, requiring adequate capacity and resourcing for both local authorities and communities themselves.

Firstly, local authorities require sufficient and sustained resource to work meaningfully with communities to develop Local Place Plans, Area Place Plans and Community Action Plans. Transport infrastructure must be planned in an integrated way alongside housing, tourism, access to services and economic development, recognising that transport is a derived demand. For the Scottish Government, this means providing appropriate funding and support—through mechanisms such as community development teams and place-based programmes—to enable this work to be undertaken properly, avoid consultation fatigue, and ensure that engagement activity is clearly linked to what communities are asking for and what can realistically be delivered.

Secondly, communities themselves need greater capacity and support to participate fully in planning processes. Community Councils, Development Trusts and other local organisations play a critical role in bringing local knowledge, priorities and lived experience into transport and wider infrastructure planning. However, many communities—particularly in rural, island and remote areas—lack the time, skills and financial resources to engage consistently and effectively. This risks reinforcing inequalities, whereby communities with the least capacity are least able to influence decisions or secure benefits.

To address this, the Council considers that targeted support is required to:

- build community capacity to engage in planning and development processes at an early stage;
- support participation in Development Plans and related transport and infrastructure strategies;
- ensure that opportunities for developer contributions and community benefit are fully realised and aligned with local priorities.

The Council also highlights the value of collaborative working with Climate Hubs and other trusted local intermediaries to engage communities on sustainable transport, active travel and wider climate-related infrastructure in ways that are accessible and locally relevant.

Funding for regional and local transport bodies, such as HITRANS, is also important to support place-based planning and coordination across local authority boundaries, particularly where transport networks serve dispersed populations.

Finally, improved use of digital engagement platforms, alongside traditional in-person approaches, can help reach rural and remote communities more effectively. This should include engagement through Community Councils, Development Trusts and local networks, ensuring that participation opportunities are inclusive and accessible. Overall, Highland Council considers that meaningful community participation in sustainable transport planning will depend on sustained investment in place-based planning, capacity-building for both local authorities and communities, and collaborative delivery models that ensure transport infrastructure reflects local needs, aspirations and agreed policy objectives.

Question 9: Transport: What action by the Scottish Government would be most helpful in supporting you to live a more climate-friendly lifestyle?

Highland Council considers that the most helpful action the Scottish Government can take is to provide sustained funding, clear national direction and coordinated delivery support that enables people to make practical, affordable and reliable low-carbon travel choices, particularly in rural and island areas.

The objectives of the Council’s Local Transport Strategy 2025–2035—improving safety, resilience and maintenance of the transport system; expanding public and shared transport options; improving walking, wheeling and cycling choices; and reducing transport emissions—are strongly aligned with national climate ambitions. However, delivering these objectives is particularly challenging in rural areas where long distances, dispersed populations and weather exposure increase costs and complexity. Funding and resourcing are the primary constraints. Long-term, multi-year funding is required not only for capital investment but also for staff capacity to plan, deliver and maintain public transport, active travel networks and the adopted road network and associated footways. Without this, delivery risks being fragmented and inequitable. Improving public and shared transport is essential. National direction and investment to support:

- more reliable, better connected and affordable public transport services;
- integrated ticketing and fare capping;
- demand-responsive transport (DRT) and Mobility-as-a-Service (MaaS) platforms;
- seasonal services to manage tourism pressures; and

- the repurposing of public-sector fleets (such as school transport, NHS vehicles and Council vans) for wider community use when not in core service would materially improve access to climate-friendly travel options in rural areas.

Expanding walking, wheeling and cycling networks is also critical. This includes developing safe routes in towns and villages and creating rural connections between homes, schools, health centres, ferries, bus and rail stations. All new and upgraded active travel infrastructure should be climate-resilient, designed to withstand flooding, winter conditions and overheating through appropriate drainage, surfacing and shading. The Council also highlights the significant potential of lift-sharing and shared car schemes, particularly in rural areas where public transport may not always be viable. Clear national policy direction, alongside support for community-based car-hire and car-share models, would help reduce car ownership while maintaining mobility. Affordability remains a decisive factor. High costs associated with electric vehicles, electricity, public transport fares and insurance can deter behaviour change. Measures that lower the cost of low-emission transport options and improve connectivity would provide a strong incentive for households to adopt more climate-friendly travel behaviours.

As a large employer, Highland Council also has a corporate responsibility to lead by example. A standardised national public-sector approach to behaviour-change measures—such as support for e-bikes and e-cargo bikes, shared fleet use and consistent travel policies—would help accelerate modal shift across the public sector workforce.

Overall, Highland Council considers that people will be best supported to live more climate-friendly lifestyles where national policy and funding enable affordable choices, reliable and connected services, and locally tailored solutions that reflect the realities of rural, island and remote communities.

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

Highland Council welcomes the priority actions set out within the Draft Climate Change Plan and Circular Economy proposals, particularly those linked to recycling, product stewardship and emissions reduction. The Council supports the overall direction of travel but considers that delivery will only be effective if national ambition is matched by operational clarity, adequate skills provision and explicit recognition of rural cost pressures.

Strengthen the circular economy

The Council supports measures to strengthen the circular economy and welcomes efforts to standardise data collection, reporting and digitisation. However, while significant datasets are held by bodies such as SEPA, Zero Waste Scotland and others, delays in publication and limited transparency around how data is used significantly reduce its value for service improvement and objective peer review. More timely, accessible and consistent data would materially improve delivery and accountability. Greater emphasis is also required on skills, training and workforce development within the waste and resource sector. Current financial support for training is limited and fragmented. Clearer alignment between skills policy, funding mechanisms and long-term sector reform is required to ensure the workforce capacity needed to deliver circular economy outcomes at scale.

Reduce and reuse

Highland Council agrees with the scope of the proposed reduce and reuse actions but notes that delivery is resource-intensive and complex. Each priority action requires clearer articulation of:

- how it will be implemented;
- who is responsible for delivery; and
- the realistic timescales for achieving outcomes.

The Council strongly supports the use of enhanced Extended Producer Responsibility (EPR) as a lever to drive reuse and repair. Greater responsibility must sit with producers to improve product durability, repairability and reuse feasibility. EPR mechanisms should be designed carefully to strengthen, rather than displace, community and third-sector reuse organisations, which play a critical role in local circular economy activity.

Modernise recycling

Highland Council remains cautious regarding the proposed use of co-design principles in the development of household recycling and reuse services, particularly in a large rural authority context. While engagement is important, local authorities hold the technical expertise required to manage complex logistical, operational and budgetary constraints. There is a risk that co-design processes may raise unrealistic expectations, delay necessary improvements or undermine local decision-making.

That said, the Council recognises that recycling system design has historically focused too heavily on collection without sufficient consideration of downstream processing. Earlier and closer engagement with treatment and reprocessing operators would improve whole-system outcomes and market alignment.

The Council strongly welcomes the intention to undertake waste compositional analysis of commercial recycling, which addresses a long-standing data gap. This work should be delivered at pace and used to target behaviour change and service design.

Decarbonise disposal

Highland Council supports moving beyond weight-based metrics to incorporate carbon intensity and wider environmental impacts. However, the Council has serious concerns regarding the cost implications of the Emissions Trading Scheme (ETS) for local authorities. ETS costs passed through from treatment providers will ultimately be borne by councils, despite limited influence over upstream product design or material composition.

These impacts are compounded for rural authorities such as Highland, which already incur unavoidable higher haulage costs due to distance from residual waste treatment facilities. At present, regions that host nationally critical waste infrastructure bear disproportionate cost while system-level benefits accrue elsewhere. This reinforces the need for coordinated national infrastructure planning, including appropriate Energy from Waste capacity, to ensure fairness and cost efficiency.

Other emission sources

The Council supports continued focus on emissions from wastewater treatment and anaerobic digestion and considers that stronger integration between waste, energy and industrial policy would unlock further emissions reductions and system efficiencies. Overall, Highland Council supports the ambition of the waste sector proposals but considers that success depends on clearer delivery pathways, stronger skills investment, improved data transparency and explicit recognition of rural cost burdens.

Without these, emissions reduction risks being achieved at the expense of fairness and financial sustainability in host regions.

Question 11: Energy Supply: What are your views on Scotland generating more electricity from renewable sources?

Highland Council strongly supports Scotland generating more electricity from renewable sources as an essential means of reducing emissions, strengthening energy security and building resilience in the face of climate change and wider global pressures. The Council recognises that the Highlands is central to delivering this ambition and is already hosting a significant proportion of Scotland's renewable energy infrastructure.

Continued growth in renewable generation must be delivered in a strategic, nature-conscious and sustainable way. In regions such as the Highlands, where infrastructure is often located in environmentally sensitive landscapes, careful management of cumulative impacts on biodiversity, landscape and natural assets is essential. These assets underpin other key economic sectors, including tourism, and are integral to community identity and wellbeing.

A core just transition issue is electricity pricing. Despite hosting a disproportionate share of Scotland's renewable generation, electricity prices in the Highlands remain among the highest in Scotland. The Council considers that continued linkage of electricity prices to fossil fuel markets fundamentally undermines both affordability and public confidence in the transition. Stronger alignment between electricity prices and low-cost renewable generation would materially reduce fuel poverty, support the electrification of heat and transport, and ensure that energy-exporting regions share fairly in the benefits of the transition.

At present, regions that host nationally significant energy infrastructure often experience a host-region penalty, bearing environmental and social impacts while facing higher energy costs than areas that benefit from consumption. Addressing this imbalance is critical to delivering a genuinely just transition.

The Council also emphasises the importance of meaningful community engagement and benefit. Communities hosting renewable infrastructure must be involved early in decision-making and see tangible, long-term benefits through consistent community benefit mechanisms, local ownership opportunities and shared value models. Without this, public consent for continued expansion cannot be assumed.

Overall, Highland Council supports further expansion of renewable electricity generation, provided it is delivered in a way that balances climate ambition with environmental protection, reforms electricity pricing, and ensures that communities in energy-exporting regions are treated as active partners rather than passive hosts.

Question 12: Business and Industrial Processes: What support do industries need to reduce their carbon emissions while remaining competitive?

Highland Council considers that supporting industrial decarbonisation while maintaining competitiveness requires a coordinated, place-based systems approach that aligns infrastructure investment, market reform and regional economic

development. For the Highlands, this represents a strategic opportunity to couple emissions reduction with long-term industrial growth.

A key requirement is shared, enabling infrastructure. Industries would benefit from open-access transport and storage networks for industrial CO₂ emissions with transparent tariffs, reducing risk and cost for individual operators. Early investment in capture-readiness for cement, chemicals and energy-from-waste facilities would enable future decarbonisation without stranding assets.

Targeted incentives are also required to accelerate adoption of low-carbon alternatives in emissions-intensive sectors such as cement, steel and aggregates. These measures should support innovation while maintaining competitiveness and protecting domestic supply chains.

The Council strongly supports greater resource efficiency and circularity, including the valorisation of industrial by-products. This includes using waste heat as an input to district heating networks and repurposing secondary materials across sectors, reducing emissions while increasing system productivity.

Highland Council sees significant potential in the development of industrial clusters with shared low-carbon utilities, including hydrogen production, CO₂ handling, heat networks and energy storage. In particular, the Council supports the establishment of Green Energy Zones in the Highlands, where industries co-locate with renewable generation and flexibility assets. Using surplus low-carbon electricity to anchor industrial demand would help address grid constraints, retain value locally and stimulate high-quality employment.

Co-location with renewable generation, storage, hydrogen and negative emissions technologies would further enhance system efficiency. However, this opportunity will not be realised without reform to electricity pricing and network charging, which currently constrain the economic case for electrified and circular industrial processes in energy-exporting regions.

Overall, Highland Council considers that industrial decarbonisation should be treated as a strategic economic opportunity. Aligning waste, energy and industrial policy in regions such as the Highlands can reduce emissions, manage system costs and retain value locally—but this requires coordinated national infrastructure planning, pricing reform and long-term policy certainty.

Question 13: Agriculture and Land Use, Land Use Change and Forestry: How can the Scottish Government encourage sustainable land use, that is also productive for local communities?

Highland Council considers that sustainable land use must be incentivised through a framework that rewards good land and ecological management, supports local productivity, and delivers climate, biodiversity and community benefits in parallel. In regions such as the Highlands, where land use underpins livelihoods, culture and landscape, a just transition requires both fairness and long-term certainty.

The Council supports the use of existing agricultural support mechanisms to incentivise sustainable land management, with enhanced payments for positive practices and clear penalties for demonstrably unsustainable management through the withdrawal or reduction of support. This outcomes-based approach would help shift behaviour while maintaining productive capacity. The Council also considers that the development of a

land-based carbon tax warrants further exploration as part of a wider suite of measures to encourage sustainable land use and internalise environmental costs.

Regional Land Use Partnerships (RLUPs) have a critical role to play as local enabling bodies, helping to identify priorities, coordinate projects and support joint delivery across land managers, communities and public bodies. However, current Scottish Government support for the North West 2045 RLUP in Highland is provided on an annual basis and is limited to the cost of one full-time equivalent post. If RLUPs are to operate effectively at a community level and engage meaningfully with all stakeholders, they require multi-year funding and a significant uplift in resourcing to provide certainty and build local capacity.

Peatland restoration at scale

Highland Council strongly supports peatland restoration as a national priority and considers that delivery at scale will require:

- procurement reform to enable local SMEs and community land trusts to participate;
- sustained investment in training a skilled ecological restoration workforce;
- secure, long-term funding aligned with ambitious but deliverable restoration targets; and
- recognition of peatland restoration as both climate mitigation (carbon storage) and climate adaptation, including flood risk reduction, wildfire prevention and water retention.

Afforestation and woodland management

Woodland creation and management should be expanded using native species, continuous cover forestry and agroforestry approaches. Forests should be supported to deliver multiple benefits, including biodiversity enhancement, timber production, natural flood management, soil stabilisation and shelter, while avoiding inappropriate planting that undermines carbon-rich soils or local land uses.

Soil and agricultural land carbon

The Council supports greater emphasis on regenerative agriculture, including cover cropping, rotational grazing and soil health improvement. Payment mechanisms should reward soil carbon sequestration alongside measures that strengthen resilience to drought and heavy rainfall. Whole-farm carbon audits should be encouraged to support informed decision-making and productivity improvements with lower emissions.

Biodiversity and natural capital

Highland Council supports requiring biodiversity net gain in major land use projects and the development of a national natural capital baseline and monitoring system. This would improve consistency, transparency and accountability while supporting better long-term outcomes.

Community benefit, equity and access

A just transition in land use must ensure that land carbon and natural capital projects deliver tangible local benefits, including jobs, skills, food production and infrastructure. Financial support for crofters, small producers and community landholders is currently inadequate, with previous grant levels too low and new funding likely to be oversubscribed. Current thresholds often favour larger landholdings, disadvantaging small-scale producers and crofting systems that are central to the Highland economy and culture. Funding mechanisms must be rebalanced to ensure equitable access for smaller land managers.

The Council also supports mechanisms that enable wider community access to natural capital and carbon benefits, particularly where large landholdings generate significant value. Models developed in the Flow Country World Heritage Site demonstrate how shared benefit approaches can operate in practice and should be explored more widely. Finally, land reform considerations remain important. Access to land for local housing and community-led development must be integrated with land use policy to ensure that sustainable land management also supports thriving communities.

Overall, Highland Council considers that sustainable land use will be most effectively encouraged through long-term, place-based policy that rewards positive outcomes, empowers regional partnerships, supports small-scale and community land managers, and ensures that climate and biodiversity action strengthens—rather than displaces—local productivity and community wellbeing.

Question 14: Agriculture and Land Use, Land Use Change and Forestry: What do you think about our proposals for planting trees and restoring natural habitats like peatlands?

Highland Council broadly welcomes the proposals for planting trees and restoring natural habitats, recognising their critical role in addressing both the climate and biodiversity crises, enhancing natural capital, and supporting a just transition. However, the Council considers that successful delivery will require ongoing financial support, long-term policy certainty and a stronger place-based approach, particularly in regions such as the Highlands.

Agricultural production across much of the Highlands remains inherently challenging due to biophysical constraints, meaning that low-intensity farming and crofting systems are the norm. While productivity is constrained, the way land has been managed over generations has delivered significant public goods, including internationally important landscapes, species and habitats, and nationally significant carbon sinks. The Highlands contain approximately 40% of the UK's priority species and over 75% of priority habitats, underlining the region's strategic importance in helping the Scottish Government meet its climate and ecological commitments. This contribution should be more explicitly recognised and supported within national policy and funding frameworks.

The Council agrees that planting trees and restoring habitats such as peatlands is essential not only for climate mitigation through carbon sequestration, but also for climate adaptation, resilience and the delivery of ecosystem services. However, expansion of these natural carbon sinks must be undertaken in a sustainable and climate-resilient manner, aligned with biodiversity objectives and sensitive to local ecological conditions.

Woodland creation and forestry

Highland Council supports expanding woodland creation using native species, continuous cover forestry and agroforestry, alongside productive forestry. The Council is currently preparing its Highland Forest and Woodland Strategy (HFWS), which will support national planting targets while reflecting local conditions, habitat diversity and landscape character. The HFWS will identify areas where woodland creation can strengthen nature networks and flood catchments, as well as areas where woodland expansion would be inappropriate, ensuring delivery of the principle of “the right tree in the right place.”

The Council emphasises the importance of productive woodland to the Highland economy, particularly in supporting rural employment and contributing to a sustainable domestic timber supply. Native woodland expansion must therefore take place alongside, not instead of, productive forestry. Where productive woodland is lost to development, there should be a strong presumption in favour of like-for-like replacement, to avoid net loss to the timber industry and the environmental and economic benefits it provides.

Managing competing land-use priorities

The Council notes that there are increasing tensions between competing land-use demands, including forestry, peatland restoration, renewable energy and grid infrastructure. While the Draft Climate Change Plan acknowledges these tensions, in some cases they risk resulting in the permanent loss of irreplaceable habitats, with insufficient mitigation or enhancement. The forthcoming Environment Strategy and strengthened evidence base on cumulative impacts are welcomed; however, it is essential that biodiversity and nature recovery are treated as equal partners to renewable energy delivery, not subordinate considerations.

Stronger alignment is needed between the Scottish Government's Land Use Strategy, Local Development Plans and sectoral policies, to support balanced, transparent decision-making on land-use trade-offs and provide greater certainty for communities and land managers.

Biodiversity, peatlands and natural capital

Highland Council supports the development of a national biodiversity net gain (BNG) record or database, clearly tracking habitat loss and enhancement across Scotland. Independent oversight or monitoring arrangements would strengthen confidence that national nature and climate objectives are being met.

The Council also calls for increased support for the Flow Country World Heritage Site, the most extensive and intact blanket bog system in the world. Despite its global significance for biodiversity, carbon storage, climate regulation and water quality, there is currently no dedicated Scottish Government revenue funding to realise the full ambition of the designation.

Peatland restoration remains a priority, but further research and guidance are required on restoration techniques and methodologies, particularly where restoration is delivered by commercial operators to offset development impacts. Improved monitoring of peatland removal associated with consented developments—especially renewable energy and grid infrastructure—is essential to ensure impacts are appropriately mitigated and offset.

Finally, the Council considers that there should be increased focus on restoring species-rich grasslands and other priority habitats, which are often overlooked but play an important role in biodiversity recovery and landscape resilience.

Overall, Highland Council supports the ambition of the proposals but considers that delivering them fairly and effectively will depend on sustained funding, stronger integration of land-use policy, recognition of the Highlands' disproportionate contribution to national outcomes, and a commitment to ensuring that climate action

Question 15: Agriculture and Land Use, Land Use Change and Forestry: How can the Scottish Government support farming to become more climate-friendly while continuing to support food production and improve biodiversity?

Highland Council considers that supporting farming to become more climate-friendly must move beyond a narrow focus on productivity alone and instead recognise the full range of ecosystem services and natural capital delivered by land-based businesses. In much of the Highlands, farming and crofting systems operate under significant biophysical constraints, yet deliver substantial public value through biodiversity, carbon storage, landscape management and climate resilience. These wider outcomes must be fully reflected in policy design, funding mechanisms and monitoring frameworks. The Council strongly welcomes the use of Whole Farm Plans as a key delivery mechanism. However, to be effective, Whole Farm Plans should be underpinned by an agreed and consistent structure that goes beyond production metrics. Plans should clearly set out how land businesses will:

- understand and manage their carbon load and carbon budget;
- address climate mitigation and adaptation;
- safeguard and enhance biodiversity and nature networks; and
- balance food production with environmental outcomes.

These expectations should be clearly articulated at national level and supported by proportionate monitoring, avoiding unnecessary administrative burden while ensuring credibility and accountability.

Regenerative and low-input farming

Highland Council supports incentivising land managers to adopt regenerative farming practices, including:

- multi-species swards, legumes and improved forage;
- rotational grazing and soil health improvement;
- reduced reliance on agricultural chemicals; and
- measures to enhance nature networks on and between farm holdings.

Support for hedgerows, riparian planting and agroforestry should be expanded and recognised not only as mitigation measures, but also as vital adaptation tools that protect soils from drought, heavy rainfall and erosion.

Carbon, methane and nutrient management

The Council supports requiring whole-farm carbon audits to inform decision-making and investment. Farmers should be supported to:

- upgrade slurry storage and spreading systems;
- improve nutrient management and pH balancing;
- adopt methane-reducing feed additives where evidence supports their effectiveness; and
- explore modular anaerobic digestion to turn farm waste into local heat and power, particularly where this can support wider community or on-farm energy needs.

On-farm energy and resilience

Highland Council supports expanding farm-based renewable energy, including rooftop solar, small-scale wind and micro-grids. Farms should be encouraged and enabled to use surplus energy for chilling, drying and charging machinery, improving resilience and reducing operating costs. Innovative approaches such as environmental farming (including hydroponics and glasshouse production) may also play a role where appropriate.

Markets, supply chains and fair value

A just transition for farming requires that producers are rewarded fairly. The Council supports:

- the development of standards for low-carbon produce;
- supply chains that properly reward climate-friendly and nature-positive production; and
- the use of public procurement to anchor local markets.

In this context, the Council highlights the potential to position venison as a staple low-carbon protein, distributed through schools, hospitals and community settings, supporting both climate objectives and rural economies.

Funding, advice and accessibility

Land managers will require financial support, advice and training to deliver these changes. Current funding processes are often complex and difficult to access, particularly for smaller farms and crofts. Simplifying funding mechanisms and reducing administrative barriers will be critical to achieving meaningful uptake and avoiding exclusion of those who could deliver the greatest environmental benefit.

The Council also considers that Government should explore setting a target for all farm holdings to permanently set aside land for biodiversity, supported by appropriate payments and flexibility to reflect local conditions.

Overall, Highland Council considers that farming can play a central role in delivering climate mitigation, adaptation and biodiversity recovery, while continuing to support food production. Achieving this will require integrated whole-farm planning, fair and accessible funding, recognition of ecosystem services, and supply chains that value climate-friendly production—particularly in regions such as the Highlands where land managers already deliver significant public benefit.

Section 3: Impact Assessments

The following questions concern the:

- *Business and Regulatory Impact Assessment (BRIA)*
- *Child rights and wellbeing impact assessment (CRWIA)*
- *Island Communities Impact Assessment (ICIA)*
- *Equality Impact Assessment (EQIA)*
- *Fairer Scotland Duty Assessment (FSD)*

The purpose of these impact assessments is to understand the effects of government policy on specific groups, including children and young people, island communities, business and equalities groups.

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

Highland Council considers that the transition to net zero will have uneven impacts across different groups and places, and that without deliberate, targeted intervention there is a significant risk that existing inequalities will be widened rather than reduced. This is particularly the case in rural, remote, coastal and island communities, which are central to delivering Scotland's net zero ambitions yet often experience the greatest disruption and least direct benefit.

Rural, remote, coastal and island communities

Communities across the Highlands and Islands are likely to be among the most affected by the transition, given the scale of renewable energy and transmission infrastructure required to meet national targets. This includes extensive onshore and

offshore wind development, grid reinforcements and associated infrastructure. While these projects are nationally important, they can bring cumulative landscape, environmental and social impacts at a local level, alongside disruption during construction and operation.

At the same time, many rural and island communities face limited access to the actions and benefits of the transition, including affordable clean heat, reliable public transport, active travel infrastructure and lower energy costs. This imbalance risks undermining public confidence and consent if not addressed through fair pricing, community benefit, shared ownership and local investment.

Low-income households and those in fuel poverty

Low-income households, and those experiencing fuel poverty or extreme fuel poverty, are particularly vulnerable. In Highland and Island Scotland, fuel poverty rates are significantly higher than the Scottish average, driven by colder climates, off-gas housing and high electricity prices. Without targeted support, these households may be unable to afford low-emission alternatives for heating, transport or energy efficiency, risking further financial pressure as systems decarbonise.

Groups facing socio-economic disadvantage

Individuals and households experiencing socio-economic disadvantage, including those living in high SIMD areas, are less able to engage with the transition due to upfront costs, lack of access to finance, digital exclusion or limited availability of local services.

This includes:

- single-person households, who face higher per-capita costs;
- single-parent families, often female-headed households, with constrained incomes and mobility needs; and
- disabled people, who may face additional barriers in accessing low-carbon transport, housing adaptations and energy systems.

Children and young people

Children and young people will inherit the long-term outcomes of the transition. While they stand to benefit from improved environmental quality and green employment opportunities, they may also be affected by decisions made now around land use, infrastructure and access to nature. Ensuring their voices are heard and that education, skills and training pathways are aligned with future opportunities is essential to a just transition.

Older people

Older people may be disproportionately affected by changes to heating systems, transport and digital services, particularly where support, advice and accessible alternatives are limited. Careful design and targeted assistance are required to ensure older residents are not excluded or exposed to increased costs or complexity.

Urban populations

Urban populations may experience different but equally significant impacts, including reduced access to nature, increased density of infrastructure, and pressure on housing and transport systems. Ensuring equitable access to green space and nature-based solutions remains important for health and wellbeing.

Oil and gas industry workers

Workers and communities currently dependent on oil and gas activity face direct employment and income impacts as the economy transitions away from high-carbon industries. These workers possess valuable transferable skills, but require timely

access to retraining, reskilling and alternative employment opportunities to avoid long-term economic and social disruption.

Overall, Highland Council considers that those most affected by the transition are often those with the least capacity to absorb change, while regions hosting nationally significant infrastructure bear disproportionate impacts. A genuinely just transition will require place-based policy, targeted financial support, fair energy pricing, meaningful community engagement and clear pathways to new opportunities, ensuring that no group or community is left behind as Scotland moves towards net zero.

Question 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?

Highland Council considers that the Draft Climate Change Plan is broadly well aligned at a strategic level with existing local, regional and national priorities, and reflects the interconnected nature of Scotland's climate, economic, social and environmental policy landscape. The Plan demonstrates strong coherence with high-level frameworks and ambitions, including net zero targets, just transition principles, biodiversity recovery and wider public sector reform.

At a local and regional level, many of the Plan's objectives align closely with Highland Council's published strategies and programmes, including those relating to net zero delivery, renewable energy, land use, transport, housing, fuel poverty, community wealth-building and resilience. The emphasis on place-based approaches, community engagement and cross-sector collaboration is welcomed and reflects the direction of travel already being taken within the Highlands.

However, while alignment at the level of strategy and intent is clear, the Council considers that the extent to which this alignment will translate into practical delivery and implementation remains uncertain. In several areas, there is a lack of clarity on how actions will be prioritised, resourced and coordinated across different tiers of government and delivery partners. Without this clarity, there is a risk that well-aligned strategies do not deliver consistent or equitable outcomes on the ground, particularly in large rural authorities with complex delivery challenges.

The Council is also less clear on the extent to which the Draft Climate Change Plan fully aligns with the needs and realities of businesses and industrial processes, particularly in energy-intensive and rural contexts. While ambition is evident, further detail is required on how industrial decarbonisation, competitiveness and regional economic development will be aligned in practice, including how businesses will be supported to invest, adapt and grow within the transition.

Overall, Highland Council considers that the Draft Climate Change Plan demonstrates strong alignment with existing priorities in principle. To fully realise this alignment in practice, greater emphasis is needed on delivery mechanisms, funding certainty, governance arrangements and clearer integration with business and industrial policy. Strengthening these aspects will be essential to ensure that strategic alignment results in tangible, place-based outcomes across Scotland, including in regions such as the Highlands.

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

Highland Council considers that while the Draft Climate Change Plan sets out a strong and necessary direction of travel, there are a number of potential negative impacts that must be actively mitigated to ensure delivery of a genuinely just and resilient transition to net zero.

A key risk is that people and communities may lack the means to engage with the actions required to transition. This includes barriers related to income, access to finance, housing type, geography, digital connectivity and physical ability. Without adequate funding, incentives, infrastructure and practical support, measures such as switching to electric vehicles, improving home energy efficiency, installing domestic renewables or relying on public transport risk becoming inaccessible to those already facing disadvantage. To mitigate this, the Council recommends expanded and better-targeted financial support, simplified access to funding, and delivery models that reflect rural, island and off-gas realities.

Energy affordability represents a further critical risk. High electricity prices, particularly in energy-exporting regions such as the Highlands, risk leaving households behind as heat and transport electrify. Action to reduce electricity costs, alongside accelerated energy efficiency support for fuel-poor and extreme fuel-poor households, is essential to prevent the transition from increasing living costs and deepening inequality.

The Council also highlights the need to strengthen resilience and emergency preparedness, particularly as systems become more reliant on electricity. Vulnerable households switching to electric heating may be exposed to greater risk during power outages or extreme weather events. Embedding resilience within emergency planning, including backup arrangements, community resilience hubs and clear support mechanisms, will be essential to protect those most susceptible to climate impacts and external pressures.

There is also a risk of biodiversity loss associated with the scale and pace of renewable energy and grid infrastructure development. This is particularly acute in the Highlands, where protected species, sensitive habitats and cumulative impacts are significant considerations. The Council considers it essential that climate action is balanced with nature recovery, ensuring that biodiversity and the natural environment are treated as equal priorities. Greater use of nature-based solutions, stronger mitigation and enhancement requirements, and improved assessment of cumulative impacts are all necessary to avoid unintended harm.

More broadly, the Council considers that adaptation and resilience must be more consistently embedded throughout the Climate Change Plan. This includes strengthening resilience across supply chains, transport networks, food systems, energy infrastructure and community services, recognising that climate impacts and transition-related pressures will be experienced differently across sectors and places. Finally, the Council emphasises the importance of active and meaningful engagement with communities, particularly those most affected by the transition. Early involvement, transparent decision-making and locally tailored solutions will be critical to identifying risks, building trust and ensuring that mitigation measures respond to real-world needs. Overall, Highland Council considers that negative impacts can be reduced through targeted financial and practical support, fair energy pricing, strengthened resilience and emergency planning, balanced treatment of climate and nature objectives, and sustained community engagement. Addressing these issues proactively will be

essential to ensure that the transition to net zero is equitable, resilient and supported by communities across the Highlands and Scotland as a whole.

Question 19: Please share any other quantitative data, or sources of this, to assist in developing the impact assessments:

MCS Figures
Changeworks Perfect Storm report – rural nature of highland/supply
Home analytic data – mainly for domestic

Question 20: Are there any previous examples or case studies we should consider when assessing potential impacts?

Highland Council considers that assessment of the potential impacts of the Climate Change Plan would be strengthened by drawing more explicitly on existing regional evidence, risk assessments and delivery case studies, particularly from rural and island contexts.

A key example is the Highland Adapts programme, including both the *Economic Impact Assessment of Climate Change Impacts* and the *Region-wide Climate Risk and Opportunity Assessment*. These studies provide a robust, place-based evidence base on how climate change and the transition to net zero are likely to affect communities, infrastructure, public services and the economy across a large, predominantly rural region. They demonstrate the importance of integrating mitigation and adaptation, understanding cumulative impacts, and tailoring responses to local circumstances. The Council also highlights its housing decarbonisation and energy efficiency programmes, including delivery of housing upgrades supported by ECO funding. These programmes provide practical insight into:

- the challenges of improving energy efficiency in older, off-gas and non-traditional housing;
- the importance of targeted support for fuel-poor households;
- delivery constraints associated with rural geography, contractor availability and grid capacity; and
- the need for simplified funding mechanisms and sustained support to achieve scale.

Together, these examples illustrate how national policy ambition translates into local delivery, and where additional flexibility, funding certainty and place-based approaches are required to avoid unintended consequences. They also demonstrate the value of using local authority-led programmes and adaptation evidence to inform national impact assessments and improve the robustness of the Climate Change Plan.

Overall, Highland Council recommends that existing regional adaptation assessments and local delivery case studies, such as those developed through Highland Adapts and housing decarbonisation programmes, are actively used to inform impact assessment, policy refinement and implementation planning.

Question 21: Can you think of any further positive or negative impacts, that are not covered in the impact assessments, that may result from the Climate Change Plan?

Highland Council has reviewed the impact assessments accompanying the Draft Climate Change Plan and considers them to be comprehensive and thorough in their

coverage of both positive and negative impacts, including those relevant to rural and island contexts.

In light of this, the Council does not identify any additional significant impacts that are not already captured within the existing assessments. The breadth of analysis reflects the complexity of the transition and appropriately considers environmental, social and economic dimensions across different groups and places, including rural areas such as the Highlands.

The Council would, however, reiterate the importance of ensuring that the impacts identified through these assessments are actively monitored and reviewed as delivery progresses, particularly in rural regions where cumulative effects and delivery challenges may evolve over time.

Overall, Highland Council considers that the current impact assessments provide a robust basis for informing the Climate Change Plan and does not propose additional impacts beyond those already identified.

Section 4: Strategic Environmental Assessment (SEA)

The following questions concern the SEA. The purpose of the SEA is to assess the likely environmental effects of government policy, considers how negative impacts can be avoided or minimised and ways that positive effects can be enhanced.

[Scotland's Draft Climate Change Plan: 2026-2040 - Strategic Environmental Assessment Environmental Report - gov.scot](#)

Question 22: What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? Are you aware of further information that could be used to inform the assessment findings?

Highland Council considers that the environmental baseline set out in the environmental report is generally robust and comprehensive at a national level and provides an appropriate starting point for assessing the likely environmental effects of the Draft Climate Change Plan. The report draws on a wide range of established datasets and presents a clear overview of current environmental conditions across Scotland.

However, the Council considers that the spatial resolution and timeliness of baseline data are critical to ensuring accuracy and relevance at a regional and local level, particularly in large, rural authorities such as the Highlands. In areas experiencing significant levels of renewable energy, grid infrastructure and land-use change, national averages can mask localised pressures, cumulative impacts and environmental sensitivities.

The Council would therefore encourage greater use of place-based and regional evidence to complement national datasets. This includes improved integration of local authority data, regional environmental assessments and sector-specific monitoring to better reflect conditions on the ground. In particular, more granular data would strengthen understanding of:

- cumulative impacts on biodiversity, landscapes and protected sites;
- pressures arising from clustered infrastructure development;
- condition and resilience of carbon-rich habitats such as peatlands and species-rich grasslands; and
- interactions between climate mitigation infrastructure and nature recovery objectives.

As highlighted in previous responses, access to timely and transparent environmental data is also essential. While significant datasets are held by national agencies, delays in publication and limited clarity on how data informs decision-making can reduce its value for assessment, peer review and adaptive management. Improving data accessibility and update frequency would enhance confidence in both the baseline and future monitoring.

The Council also notes that existing regional evidence could further inform the assessment findings, including:

- regional climate risk and opportunity assessments developed through adaptation programmes;
- local biodiversity audits and habitat condition assessments; and
- delivery experience from local authority-led decarbonisation, land-use and infrastructure programmes.

Overall, Highland Council considers that while the environmental baseline is sound in scope, its effectiveness would be strengthened through greater use of regional and local data, improved treatment of cumulative effects, and more explicit linkage between baseline conditions, future monitoring and adaptive policy responses. This would support a more accurate assessment of impacts and better inform delivery in areas experiencing the greatest environmental change as part of the transition to net zero.

Question 23: What in your view are the most significant environmental effects which should be taken into account as the Draft Climate Change Plan is finalised?

Highland Council considers that the most significant environmental effects arising from the Draft Climate Change Plan relate not only to the scale of change proposed, but to the spatial concentration, cumulative impacts and interactions between climate mitigation, adaptation and nature recovery, particularly in rural and island regions. One of the most significant effects is the cumulative impact of renewable energy and grid infrastructure on landscapes, biodiversity and protected sites. While individual projects may be acceptable in isolation, the combined effect of onshore and offshore wind, transmission infrastructure, access tracks and associated development can place substantial pressure on sensitive habitats and species. This is particularly relevant in the Highlands, where nationally and internationally important natural habitats coincide with high renewable energy potential. These cumulative effects must be fully understood and managed if public confidence and environmental integrity are to be maintained.

Closely linked to this is the potential impact on carbon-rich habitats, including peatlands and species-rich grasslands. While restoration activity offers significant climate benefits, inappropriate development or poorly designed mitigation risks permanent loss of irreplaceable habitats and associated carbon stores. The Plan must therefore ensure that protection, restoration and enhancement of these environments are prioritised alongside delivery of renewable energy.

Another significant effect relates to land use change at scale, including afforestation, peatland restoration, agriculture and infrastructure development. Without strong spatial coordination, there is a risk of competing demands leading to sub-optimal outcomes for climate, biodiversity and local communities. The interaction between

land use change and water systems, flood risk, soil stability and ecosystem resilience is particularly important in the context of a changing climate.

The Council also highlights the environmental effects associated with resource use, waste and circular economy activity, including emissions from waste treatment, transport of materials and infrastructure requirements. These effects are often felt disproportionately in rural host regions and must be considered alongside national emissions reduction benefits.

Finally, the Council considers that the effectiveness of adaptation and resilience measures will have significant environmental implications. Strengthening resilience of habitats, ecosystems and green infrastructure to climate impacts such as flooding, drought, wildfire and extreme weather will be essential to sustaining long-term environmental benefits and avoiding unintended consequences of mitigation activity. Overall, Highland Council considers that the Draft Climate Change Plan should give particular attention to cumulative and spatially concentrated environmental effects, ensure that climate action and nature recovery are treated as equal and mutually reinforcing priorities, and strengthen mechanisms for monitoring, mitigation and adaptive management as delivery progresses.

Question 24: What are your views on the predicted environmental effects as set out in the environmental report? Please share any other useful sources

Highland Council considers that the predicted environmental effects set out in the environmental report are generally well articulated and appropriately reflect the broad range of positive outcomes expected from delivery of the Draft Climate Change Plan, particularly in relation to emissions reduction, nature-based solutions and long-term environmental resilience.

The report usefully identifies potential adverse effects and acknowledges areas of uncertainty, which is welcomed. However, the Council considers that the predicted effects would benefit from greater spatial and place-based differentiation, particularly in regions such as the Highlands where the scale and concentration of climate mitigation infrastructure and land-use change are likely to be significantly higher than the national average.

In particular, predicted effects relating to renewable energy generation, grid infrastructure, land use change and peatland restoration should more explicitly account for cumulative and interacting impacts on landscapes, biodiversity, water systems and carbon-rich habitats. While individual effects are described, the combined influence of multiple interventions occurring simultaneously or sequentially within the same geographic areas is more difficult to discern and warrants further emphasis.

The Council also considers that the predicted effects would be strengthened by clearer linkage between mitigation, enhancement and monitoring measures, ensuring that potential negative impacts are not only identified but actively managed and adjusted over time through adaptive delivery.

In terms of additional sources, Highland Council highlights the value of:

- regional climate risk and opportunity assessments, including those developed through local adaptation programmes;
- local authority biodiversity audits and habitat condition assessments;
- cumulative impact studies associated with renewable energy and grid infrastructure; and

- operational evidence from local authority-led decarbonisation, land-use and infrastructure delivery programmes.

These sources can provide valuable context on how predicted environmental effects manifest at a local level and support more robust assessment, monitoring and refinement of policy as implementation progresses.

Overall, Highland Council considers that the predicted environmental effects provide a sound high-level assessment, but that greater use of regional evidence, improved treatment of cumulative impacts and stronger links to adaptive management would enhance confidence that environmental outcomes can be delivered effectively and equitably across all parts of Scotland.

Question 25: What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

Highland Council considers that the proposals for mitigation, enhancement and monitoring set out in the environmental report provide a sound and necessary framework for managing the environmental effects associated with delivery of the Draft Climate Change Plan. The emphasis on avoiding, reducing and offsetting adverse impacts, alongside opportunities for environmental enhancement, is welcomed. However, the Council considers that the effectiveness of these proposals will depend heavily on how they are applied in practice, particularly in regions such as the Highlands where environmental sensitivities and cumulative pressures are greatest. Mitigation and enhancement measures must be sufficiently place-based, proportionate and enforceable to address the scale and concentration of impacts likely to arise from renewable energy development, grid infrastructure, land use change and waste and industrial activity.

In particular, the Council considers that:

- mitigation measures should place greater emphasis on avoiding impacts at source, especially where irreplaceable habitats, carbon-rich soils and protected species are affected, rather than relying on downstream compensation;
- enhancement measures should be designed to deliver measurable biodiversity and ecosystem resilience gains, contributing to nature recovery as well as climate objectives; and
- monitoring arrangements should be capable of identifying cumulative and interacting effects across sectors and geographies, rather than assessing impacts solely on a project-by-project basis.

The Council also highlights the importance of timely, transparent and accessible data to support effective monitoring. While significant environmental data is collected by national bodies, delays in reporting and limited integration across datasets can reduce its value for adaptive management and local decision-making. Improved alignment between national monitoring frameworks and local authority data would strengthen accountability and delivery.

Finally, Highland Council considers that mitigation, enhancement and monitoring must be supported by clear governance and long-term resourcing. Without sustained funding, skills and institutional capacity, there is a risk that commitments made at plan level are not fully realised on the ground, particularly in rural and island authorities with extensive land and infrastructure responsibilities.

Overall, the Council supports the proposed approach but considers that it would be strengthened through greater emphasis on place-based application, cumulative impact management, robust monitoring and adaptive review. Ensuring that mitigation and enhancement measures are consistently implemented and adjusted over time will be essential to delivering both climate and nature outcomes in a fair and credible way.

Section 5: Monitoring emissions reductions

The following questions concern the reporting of annual emissions reductions.

Question 26: What are your views on the proposed approach to reporting annual emissions output and how this could support public understanding of Scotland's progress towards achieving our Carbon Budgets?

Highland Council welcomes the commitment to reporting annual emissions output and recognises the importance of transparent, consistent reporting in supporting public understanding of Scotland's progress towards meeting its Carbon Budgets. Regular reporting plays a critical role in building trust, maintaining accountability and enabling informed public and stakeholder engagement.

The Council considers that the proposed approach would be strengthened by ensuring that emissions reporting is clear, accessible and meaningful to non-technical audiences. While national-level reporting is essential, presenting information solely at an aggregate level can make it difficult for communities, businesses and local authorities to understand how progress relates to their own places and actions. Providing clearer narrative explanations alongside data would help contextualise trends, explain variances and link outcomes to policy interventions.

The Council also considers that emissions reporting should be more strongly linked to delivery and decision-making. Annual outputs should not only track progress against targets, but also inform adaptive policy responses where progress is off track. This is particularly important in the context of regional disparities, where emissions reductions and infrastructure impacts may be unevenly distributed.

As highlighted in previous responses, greater spatial granularity would significantly enhance public understanding. Where possible, emissions data should be presented at regional or sectoral levels to illustrate how different parts of Scotland are contributing to, and affected by, the transition. This would support place-based accountability and help demonstrate the role of regions such as the Highlands in delivering national outcomes.

Finally, the Council emphasises the importance of timely publication and data transparency. Delays between data collection and reporting can reduce relevance and public confidence. Clear explanations of data limitations and uncertainties would further strengthen credibility.

Overall, Highland Council supports the proposed approach to annual emissions reporting and considers that its value would be maximised through clearer communication, stronger links to delivery, improved spatial insight and timely, transparent publication. This would help ensure that reporting not only tracks progress, but actively supports understanding, engagement and effective action towards Scotland's Carbon Budgets.

Question 27: How useful do you think reporting emissions statistics at a more detailed level (including at the sub-sectoral level), would be in helping people understand key sources of emissions, and our progress in reducing them?

Highland Council considers that reporting emissions statistics at a more detailed, including sub-sectoral, level would be highly beneficial in improving understanding of where emissions arise and how effectively they are being reduced. Greater detail would help communities, businesses and public bodies better understand the relative contribution of different sectors and activities, identify priority areas for action, and see how policy interventions translate into measurable outcomes. This is particularly important in complex systems such as energy, transport, buildings and land use, where aggregate figures can obscure underlying trends. The Council emphasises that the value of more detailed reporting will depend on how the information is presented. Data should be accessible, clearly explained and supported by narrative and visual tools that enable non-technical audiences to interpret trends and progress without requiring specialist knowledge. Overall, Highland Council supports more granular emissions reporting, provided it is delivered in a transparent and user-friendly way that enhances public understanding and supports informed engagement with Scotland's progress towards its Carbon Budgets.

Question 28: How might the use of timely indicators, as proposed, help people to understand what needs to be delivered to achieve our Carbon budgets, and to understand whether progress is on track?

Highland Council supports the use of timely indicators as an important tool for improving understanding of what needs to be delivered to achieve Scotland's Carbon Budgets and for tracking whether progress is on course. Timely indicators can help bridge the gap between long-term emissions data and real-world delivery by providing earlier signals of whether policies and actions are having the intended effect. This can support more informed public discussion, enable earlier course correction, and improve accountability across all levels of government. However, the Council considers that the effectiveness of these indicators will depend on greater clarity around who is responsible for producing them, what they are intended to measure, and how they will be resourced and maintained. Without clear ownership, consistent methodologies and sufficient resourcing, there is a risk that indicators become partial, delayed or difficult to interpret. The Council also emphasises the importance of transparency in how indicators are selected and used, including clear explanation of their limitations and how they relate to longer-term emissions outcomes. Where possible, indicators should be aligned with existing monitoring frameworks to avoid duplication and unnecessary reporting burdens. Overall, Highland Council considers that timely indicators have the potential to significantly enhance understanding of delivery progress, provided they are underpinned by clear governance, adequate resourcing and transparent communication. Ensuring these conditions are in place will be critical to maintaining confidence in their role in tracking progress towards Scotland's Carbon Budgets.

Section 6: Monitoring Just Transition

The following questions concern the following 14 proposed indicators for monitoring and evaluation of the Climate Change Plan.

- 1. Participation in decision making*
- 2. Community energy*
- 3. Community benefits*
- 4. Changes to places*
- 5. Fuel poverty*
- 6. Transport affordability*
- 7. Socio-economic impact on oil and gas communities*
- 8. Impact on household finances in oil and gas communities*
- 9. Access to training for offshore oil and gas workers*
- 10. Green jobs*
- 11. Impact of energy prices on small businesses*
- 12. Air pollution*
- 13. Woodland creation*
- 14. Peatland restoration*

Question 29: Please detail any specific changes that would improve any of the 14 proposed indicators, including any data sources not currently included within this framework that could provide a useful indicator of progress towards a just transition in Scotland on an annual basis.

Highland Council supports the proposed development of a more comprehensive monitoring and evaluation framework for just transition. However, the Council considers that the current list of 14 proposed indicators is not sufficiently comprehensive to capture the full range of social, economic and environmental impacts associated with the transition to net zero, particularly in rural, remote and island communities.

Several indicators would benefit from broader scope. For example, indicators relating to access to training, skills and alternative employment, and impacts on household finances, are currently focused primarily on oil and gas workers and communities. While this is important, Highland Council considers that these indicators should be expanded to reflect the wider workforce and population affected by the transition, including those in agriculture, forestry, tourism, construction, transport and other sectors, as well as households facing rising costs associated with heat, transport and energy.

The Council also considers that there is a gap in relation to sector-specific indicators, particularly for land-based and rural industries. Indicators relating to agriculture and other key industries, such as food and drink (including whisky), would provide valuable insight into how emissions reduction and just transition measures are affecting productivity, employment and resilience in these sectors.

Transport-related indicators would also benefit from refinement. In addition to affordability, Highland Council considers that indicators should reflect transport connectivity and reliability, particularly in rural and island areas where access to services, employment and education is heavily dependent on transport availability rather than cost alone.

From an environmental perspective, while woodland creation and peatland restoration are appropriately included, the Council considers that additional indicators are required to reflect:

- marine environment preservation and restoration, particularly given the importance of coastal and marine ecosystems to Highland communities and the blue economy;
- biodiversity preservation and restoration more broadly, beyond habitat extent alone; and
- freshwater environment condition and restoration, including rivers, lochs and catchments affected by land use change and infrastructure development.

The Council also notes the absence of indicators relating to the circular economy and waste, despite their significance for emissions reduction, resource efficiency and local economic opportunity. Including indicators on waste reduction, reuse, recycling quality and circular economy activity would provide a more complete picture of progress. Finally, Highland Council considers it essential that the monitoring framework explicitly references remote, rural and island communities. Without spatial differentiation, indicators risk masking uneven impacts and outcomes, undermining the core purpose of a just transition framework.

Overall, Highland Council supports the development of a more robust and comprehensive just transition monitoring framework and recommends that the proposed indicators be expanded and refined to better reflect sectoral diversity, geographic variation and the full range of social, economic and environmental outcomes associated with the transition. This would strengthen transparency, accountability and confidence that progress towards net zero is being delivered fairly across all parts of Scotland.

Question 30: What are the most appropriate indicators for judging whether we are achieving meaningful public participation in decisions related to the climate?

This includes both the quality of the participatory process itself, and the impact of that participation on the decision-making process.

Highland Council considers that meaningful public participation in climate-related decision-making is best assessed through a combination of quantitative and qualitative indicators that capture both the breadth of engagement and the depth and influence of participation.

The Council notes the value of national citizen engagement mechanisms, including Scotland's Climate Assembly, which was established following the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. There is significant merit in re-establishing or building upon this model, as it provides a structured and deliberative forum through which a diverse range of voices can meaningfully inform climate policy and the Climate Change Plan. Such approaches are particularly valuable in ensuring that perspectives from different geographies, age groups and socio-economic backgrounds are represented.

At a local level, Highland Council considers that indicators of meaningful participation should include:

- the diversity of participants, including representation from rural, remote and island communities, young people, tenants, disabled people and those experiencing socio-economic disadvantage;
- the range of engagement mechanisms used, including deliberative processes, digital platforms and place-based approaches; and

- evidence that participation has had a clear influence on decisions, priorities or delivery approaches, rather than being limited to consultation alone.

The Council highlights the relevance of its developing Participation and Engagement Strategy, which sets out principles, methods and commitments to increasing involvement from communities in service design and delivery. This approach, including targeted engagement with hard-to-reach groups, provides a useful framework that could inform both national and local indicators of effective participation.

Specific mechanisms that could support and inform participation indicators include:

- engagement through tenant participation officers, particularly in relation to housing, energy efficiency and fuel poverty;
- structured involvement of young people, including through youth parliament and youth engagement networks;
- use of the Place Standard tool, incorporating a climate lens, to assess how communities experience and shape place-based climate interventions.

Highland Council also considers that indicators should capture whether engagement activity is adequately resourced, inclusive and ongoing, rather than one-off or reactive. This includes recognising the capacity constraints faced by both communities and public bodies, and the need to avoid consultation fatigue.

Finally, the Council recommends that proposed indicators on public participation are subject to review and input from specialist community engagement teams, including those within Communities and Place functions, to ensure they are practical, meaningful and aligned with best practice.

Overall, Highland Council considers that meaningful public participation is best judged not simply by the number of engagements undertaken, but by who is involved, how engagement is undertaken, and whether participation demonstrably shapes climate-related decisions and outcomes at both national and local levels.

Question 31: What indicator would provide the best measure of the impact of net zero development in local communities across Scotland?

For example, the impact of the installation of renewable energy infrastructure or other land use changes (e.g. through peatland restoration or tree planting).

Highland Council considers that no single indicator will fully capture the impact of net zero development in local communities. Instead, the most meaningful assessment will come from a small set of complementary, place-based indicators that reflect how communities experience change in practice.

In particular, the Council considers that indicators relating to:

- Indicator 1.4 – Changes to places
- Indicator 1.1 – Participation in decision-making
- Indicator 1.3 – Community benefits

are central to understanding whether net zero development is delivering positive, equitable outcomes at a local level.

Changes to places (Indicator 1.4)

This indicator should capture tangible improvements to the quality, resilience and functionality of places as experienced by communities. This may include changes to local infrastructure, services, environment and public realm, as well as impacts on landscape and amenity. Use of established place-based assessment tools and

qualitative evidence would help ensure that lived experience is reflected alongside quantitative measures.

Participation in decision-making (Indicator 1.1)

Meaningful local impact is closely linked to whether communities have had genuine opportunities to shape decisions affecting them. This indicator should therefore assess not only the extent of engagement, but the inclusivity, representativeness and influence of participation, particularly for rural, remote and island communities.

Community benefits (Indicator 1.3)

Community benefit indicators should go beyond the presence of benefit arrangements to assess their distribution, accessibility and long-term value. This includes understanding whether benefits are reaching communities most affected by development and whether they support outcomes such as fuel poverty reduction, resilience, skills development and local economic opportunity.

Service-led refinement of indicators

Given the cross-cutting nature of local impacts, Highland Council strongly supports sharing and refining these indicators with relevant service teams across local government and partner organisations. Drawing on specialist expertise in areas such as planning, housing, transport, environment, community development and economic development will help ensure that indicators are practical, measurable and genuinely reflective of delivery activity.

Overall, Highland Council considers that the impact of net zero development in local communities is best measured through a balanced set of place-based indicators that capture changes to places, the quality of participation, and the fairness and effectiveness of community benefits. Developing these indicators collaboratively with delivery services will be essential to ensuring they provide a credible and meaningful measure of just transition outcomes across Scotland.

Question 32: What specific data or indicators could we use to monitor the extent to which workers in high-carbon industries are securing alternative employment?

Highland Council considers that monitoring the extent to which workers in high-carbon industries are securing alternative employment requires indicators that move beyond access to training alone and instead capture actual employment outcomes and local economic transition.

While Indicator 3.1 (Access to training for offshore oil and gas workers) is a useful starting point, the Council considers that this indicator should be expanded and reframed to reflect wider employability and economic development outcomes, and to include workers across all high-carbon and transition-exposed sectors relevant to regional economies.

Effective indicators should include:

- Participation in retraining, upskilling and reskilling programmes, disaggregated by sector, geography and demographic group;
- Progression into alternative employment, including job entry, retention and career progression within low-carbon and future-facing industries;
- Alignment between training provision and labour market demand, ensuring that skills pathways lead to real, sustainable job opportunities;
- Geographic accessibility of training and employment, particularly in rural, remote and island areas where access to provision may be limited; and

- Job quality and income outcomes, to assess whether workers are moving into secure, well-paid employment rather than precarious or short-term roles.

Highland Council considers that these indicators should draw on employability and economic development data, including local and regional labour market intelligence, to provide a more accurate, place-based understanding of workforce transition.

The Council also strongly supports the collaborative development of these indicators with relevant service teams, including employability, economic development and energy teams, to ensure that measures are practical, evidence-based and reflective of delivery realities.

Overall, Highland Council considers that the success of the transition for workers should be judged not only by access to training, but by successful movement into sustainable alternative employment that supports long-term economic resilience and a just transition for communities across Scotland.

Question 33: What specific data or indicators could we use to meaningfully monitor the impact of the transition to net zero on the environment and biodiversity across Scotland on an annual basis?

Highland Council considers that meaningful monitoring of the environmental and biodiversity impacts of the transition to net zero requires a strengthened, coherent and transparent set of indicators, supported by clear targets, consistent data collection and national oversight.

The Council supports the need to strengthen Biodiversity Duty reporting, with clearer expectations and key targets for local authorities. Greater clarity is also required on how forthcoming legislation, including the Natural Environment Bill, will translate into statutory duties, targets or reporting requirements for local government, and how this will align with the Climate Change Plan monitoring framework.

Highland Council considers that indicators should explicitly track biodiversity enhancement and restoration outcomes, including those secured through the planning system. In particular, indicators should reflect biodiversity enhancement delivered through NPF4 Policy 3, with consistent national monitoring to demonstrate whether development is contributing to nature recovery as intended.

The Council strongly supports the establishment of a national record or database that transparently sets out:

- locations of biodiversity and habitat loss associated with development;
- how these impacts have been avoided, mitigated or offset through biodiversity net gain and wider nature restoration initiatives; and
- cumulative progress towards Scotland’s climate and nature objectives.

Such a dataset would significantly improve transparency and accountability and enable objective assessment of whether Scotland is meeting its commitments. The Council also considers that independent oversight or scrutiny arrangements would strengthen confidence in monitoring outcomes.

In terms of specific indicators, Highland Council supports the inclusion and further development of indicators relating to:

- air pollution, particularly in communities affected by transport and infrastructure;
- woodland creation, including quality, connectivity and resilience, not just hectares planted; and

- peatland restoration, recognising its dual role in emissions reduction and climate adaptation.

The Council further recommends the inclusion of equivalent indicators for:

- marine environment preservation and restoration, reflecting the importance of coastal and marine ecosystems to Scotland's climate resilience and local economies;
- freshwater environment condition and restoration, including rivers, lochs and catchments affected by land use change and infrastructure; and
- biodiversity preservation and restoration more broadly, to capture ecosystem condition, connectivity and species outcomes rather than activity alone.

Finally, Highland Council supports sharing and refining these indicators with environment and delivery teams to ensure they are practical, evidence-based and aligned with existing monitoring activity.

Overall, the Council considers that annual monitoring of environmental and biodiversity impacts should demonstrate not only activity, but measurable improvement in ecosystem condition and resilience, supported by transparent data, clear targets and robust governance. This will be essential to demonstrating that the transition to net zero is addressing the climate and nature emergencies in an integrated and credible way.