Making environmental policy inclusive in Scotland

Introduction

[Everyone's Environment](#), co-ordinated by [NPC](#), is a collaboration of over 80 social and environmental charities to accelerate action on the social impacts of the environmental crises. The programme is currently looking to influence Scottish environmental policies to ensure they better reflect the needs of marginalised and disadvantaged groups.

This position statement has been developed as part of the Everyone's Environment programme and represents the views of the following organisations:

Background

In 2024, Everyone's Environment held deliberation groups and a roundtable for Scotland-based charities to understand what Black, Asian and Minority Ethnic groups[1], young people, Disabled people, and older people in Scotland need from environmental policy.

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[1] Black, Asian and Minority Ethnic (BAME) groups is used throughout this paper to signal a political and equalities lens. We want to acknowledge that people from Black, Asian and Minority Ethnic groups are not all the same but that they may share common experiences. These experiences may be different or similar to the majority communities in the same area, but this needs to be explored and better understood.

Green and blue spaces[2], transport, renewables, housing, and green jobs emerged as the five most important policy areas.

The people that we heard from had four priorities for how these policies should be delivered:

- active involvement in policy design and implementation

- a rights-based/fairness approach

- accessible information

- and greater action at the devolved level.

Everyone's Environment commissioned the Environmental Rights Centre for Scotland (ERCS) to review current Scottish Government policy papers in these areas and identify policy gaps drawing on the work of wider civil society.

The findings from these reviews (produced in September-November 2024) are summarised in this position statement.

Policy recommendations for priority areas

In the priority areas of green and blue spaces, transport, renewables, housing, and green jobs, we commend that the Scottish Government has already created several policies to improve environmental sustainability. It is also positive to see attention to policy topics that join up action across multiple areas, such as energy-efficiency policies that address both access to renewable heating and housing quality.

However, more attention is needed on the social outcomes of environmental policies. Our recommendations address gaps in how these policies should respond to the needs of Black, Asian and Minority Ethnic groups, young people, Disabled people and older people, to ensure they benefit equitably.

This paper also acknowledges that Disabled people are a community of multiple intersecting identities and that they will face different barriers depending on other factors including rural or urban locations, poverty, and social networks. Our recommendations reflect the social model of

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[2] Blue spaces are dominated by a watery element, such as a lakeside, river or coast. Green spaces may include a watery element but are characterised by predominantly 'green' elements such as grass or trees.

disability and aim to support Disabled people to exercise their rights to independent living and a healthy environment.

Overall, these gaps speak to a need for embedding a human rights-based approach across Scotland's environmental policies. Importantly, they also highlight the need to ensure implementation is well-resourced.

Our recommendations call for greater action from the Scottish Government to address the intersection of poor environmental quality and poverty which contributes to health inequalities and systemic discrimination. Only in this way will everyone be able to enjoy their economic, social, and cultural rights and protect our right to a healthy environment.

1. Access to quality green and blue spaces

a. Current policy position

Scotland has a national indicator for green and blue space access, which measures the proportion of adults living within a 5-minute walk to their nearest green or blue space.

Government policies on increasing available green space focus on planning guidance for local authorities to favour proposals to increase green spaces. Participation in planning is supported at the community level. Policies on green space use focus on play and sport spaces for children and young people.

b. Feedback from Everyone's Environment

Policies are needed to improve green and blue space quality, responding to the needs of Black, Asian, and Minority Ethnic groups, young people, Disabled people, and older people.

Quality green and blue space can be accessible to different groups of people and benefit health and wellbeing, whilst also supporting climate resilience and nature recovery. For example, by reducing flood risk, providing shade and cooling, and space for wildlife. This could be addressed by incorporating quality in the national indicator, ensuring provision of green and blue spaces in housing, and creating specific duties/guidance around engaging all residents on green space improvement.

Recommendations:

- We support a National Indicator which specifies the quality of local green and blue space to be measured alongside the target of access within a 5 minutes' walk.

- Local authorities, housing associations, and national parks need to demonstrate commitment and consistency to meaningfully engage with local communities to deliver improvements on the quality and accessibility of green and blue spaces, including Black, Asian, and minority ethnic groups, Disabled people, and children and young people (see Greenspace Scotland; ERCS, CEMVO Scotland, The Poverty Alliance, and Nourish[3]).

- The outcomes of this engagement should be made publicly accessible and implemented in the co-design of local green and blue spaces.

- The sustainable role of communities in managing and/or owning local green and blue spaces, and the resource requirements for this, should be reflected in approaches to local democracy and community empowerment and reflected in future iterations of Land Reform legislation.

2. Accessible, affordable and clean transport

a. Current policy position

Scotland's active travel policies focus on public education and expanding infrastructure. Barriers to using public transport are addressed through assistance and concession schemes. Policies on cleaner transport include investment in decarbonising rail and buses, and limiting the use of most polluting private vehicles while financially supporting the purchase of electric vehicles.

b. Feedback from Everyone's Environment

Active transport could be made more inclusive by engaging Disabled people in infrastructure design and implementing further speed limits to increase safety. Policy should seek to integrate active and public transport options, and increase accessibility by expanding ticket concessions and improving passenger safety. Disincentivising private car use requires a more targeted approach to ensure it does not reduce accessibility.

Recommendations:

- We encourage the government to go further in integrating active travel and public transport options and reinforcing the public health benefits (see Sustrans, The Poverty Alliance[4]).

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[3] Greenspace Scotland (accessed 29 January 2025) Communities grow in greenspace; ERCS, CEMVO, Poverty Alliance, Nourish (August 2024) Race & the Right to a Healthy Environment
[4] Sustrans (accessed 23 October 2024) Our position on public transport; The Poverty Alliance (2023) Challenge Poverty Week 2023 Policy Briefing 4: A Scotland where we can all get to where we need to go.

- We agree with Inclusion Scotland that Disabled people must be involved in the design phase to ensure their accessibility rights are not infringed.[5]

- We agree with Living Streets Scotland on the need to implement 20 mph speed limit zones. Increased road safety would improve the quality of the street environment and enable more people to walk, wheel, and cycle.[6]

- We support The Poverty Alliance's proposal for concessionary travel to be extended to under 25s, people in receipt of low-income and disability benefits, unpaid carers, students and modern apprentices, and asylum seekers on all modes of public transport.[7]

3. Fair access to renewables

a. Current policy position

The Scottish Government's policy in this area revolves around targets and corresponding strategies to decarbonise Scotland's energy system, heat homes with renewables, and eradicate fuel poverty.

As most of Scotland's energy policy is reserved to the UK government, these targets are pursued through planning guidance, building regulations, and financial support for heating costs, installing low or zero carbon heating systems, and community-owned renewables.

b. Feedback from Everyone's Environment

Renewable energy production could be accelerated by setting up a coordinating agency and a community renewables working group, while also investing into diversifying sources of energy and technologies to store it.

Expanding benefits and integrating them with the support for renewable heating is an opportunity to address fuel poverty and access to renewables together. Support for renewable heating systems could also be improved by tailoring it for and with Disabled people, older people, and rural communities.

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[5] Inclusion Scotland (2021) It's our planet too: Climate change, disabled people and climate action in Scotland: pp.14 & 22
[6] Living Streets (2022) Getting Scotland Walking: the Case for Action: p.16
[7] The Poverty Alliance (2024) Challenge Poverty Week 2024 Policy Briefing 2: A Scotland where we can all get to where we need to go.

Recommendations:

- We urge the government to create a tailored action plan for connecting rural homes to renewable energy supply, in consultation with rural communities, and introduce a rural uplift to fuel poverty payments (see The Poverty Alliance, Changeworks[8]).

- We support establishing a Minimum Income Guarantee to tackle fuel poverty as proposed by The Poverty Alliance.[9] However, to address the needs of vulnerable households in the short term, the government should broaden eligibility for fuel payments and increase the Winter Heating Payment to at least £100 (see Just Transition Commission, The Poverty Alliance[10]).

4. High-quality housing and a more resilient built environment

a. Current policy position

Scotland has various standards to regulate the quality of housing across tenures. The Scottish Government is looking to improve them with new standards for energy-efficiency and accessibility.

Advice and funding for adaptations, repairs, and energy-efficiency are available for homeowners, with a specific fund for Gypsy/Traveller accommodation.

b. Feedback from Everyone's Environment

Flood and extreme weather resilience should be added to building standards, including resilience to heat stress in urban areas. Local/national quotas are required for housing that meets additional needs alongside investment into enforcement of standards, particularly in rentals. A central agency that integrates housing and energy could more efficiently support meeting these standards.

In addition, it is crucial to situate high quality housing within the context of a more climate resilient built environment. This mutually reinforces improved access to green and blue spaces, clean transport, and renewable energy options for greater individual and community wellbeing and resilience.

Recommendations:

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[8] The Poverty Alliance (April 2023) Submission to the Scottish Government: Draft Energy and Just Transition Plan: p.8; Changeworks (2023) Fuel Poverty in Rural Scotland: The Solutions: p.3
[9] The Poverty Alliance (2024) Policy Briefing 3: A Scotland where we all have enough to live a decent and dignified life: p.1
[10] Just Transition Commission (2023) Making the Future: Initial Report of the 2nd Just Transition Commission: p.18, The Poverty Alliance (April 2023) Submission to the Scottish Government: Draft Energy and Just Transition Plan: p.8

- While we welcome the improved housing standards, we support Living Rent's recommendations for stronger enforcement mechanisms, such as rent controls, to ensure repairs and energy-efficiency measures are carried out in a timely manner by landlords.[11]

- We agree with the Royal Society of Edinburgh on the need to implement property flood resilience through building standards, and making existing social and local authority housing more flood resilient.[12]

- Recognising that 80% of the buildings we will use in 2050 have already been built, we believe retrofit and upgrades to existing homes should be prioritised.[13]

5. Accessible green jobs and skills

a. Current policy position

Scotland has various strategies and plans deriving from the Climate Change Plan to decarbonise different work sectors. Alongside direct funding, legislation for circular economy and community wealth building are being brought forward to stimulate green jobs in Scottish supply chains.

There have also been a range of independent reviews commissioned by the Scottish Government in recent years regarding various aspects of the skills landscape, including James Withers' Independent Review of the Skills Delivery Landscape. Withers identifies the requirement for a needs-based approach to national skills planning,[14] tied to the National Strategy for Economic Transformation. Career and skills support is available for a selection of green industries.

b. Feedback from Everyone's Environment

Policies in this area should be integrated and expanded, taking a 'whole economy' approach that also addresses economic structures beyond decarbonising a few selected sectors.

Targeted employability and training support into green jobs is required for all of the priority groups. More also needs to be done on just transition, with workers engaged in transition planning and improving labour rights.

Recommendations:

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[11] Living Rent (accessed 22 November 2024) A New Deal for Private Tenants - Living Rent policy note
[12] Royal Society of Edinburgh (September 2024) Flood Resilience Strategy: p.6
[13] UK Green Building Council (21 February 2019) UKGBC responds to CCC housing report
[14] Withers (May 2023) Fit for the Future: developing a post-school learning system to fuel economic transformation

- We encourage the government to go further in integrating Fair Work and worker representation into a green industrial strategy for all work sectors, as proposed by the Just Transition Partnership.[15]

- We recommend employability support schemes and employment action plans for young people, Disabled people and Black, Asian, and Minority Ethnic groups that are tangibly connected to green jobs and skills. This aligns with the recommendation in the Independent Review of the Skills Delivery Landscape to 'urgently articulate the specific skills requirements associated with the policies in the Climate Change Plan and assess these against existing provision in the postschool learning system, taking a whole-system perspective to ensure that there is a cumulative understanding of skills needs of the path to net zero.'[16]

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Everyone's Environment

Everyone's Environment is a collaboration of over 80 social and environmental charities, working to accelerate action on the social impacts of the environmental crises. The environmental crises do not affect all people in the same way; some of the most disadvantaged and marginalised people are worst affected by our changing environment and related policy. Charities and funders have a critical role to play in supporting and empowering different social groups to be part of the solutions.

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[15] Just Transition Partnership (accessed 22 November 2024) The Scottish Government's credibility on just transition can be regained through a green industrial strategy.

[16] Withers (May 2023) Fit for the Future: developing a post-school learning system to fuel economic transformation: 30