

Consultation on the Draft Scottish Climate Change Adaptation Programme



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

This is a joint response by UKCIP and Adaptation and Resilience in the Context of Change (ARCC).

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3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

1 Views on the Overarching Framework

1a To what extent does the overarching framework of the Programme outlined in Figure 1 set an appropriate long term direction for climate change adaptation in Scotland?

Fully Mostly Partially Poorly *Tick one box only*

Comments:

The overarching framework presents a useful description of adaptation actions planned and underway. However, there is little information about how the Programme will be delivered, thus we have a number of questions and issues that we believe will need to be addressed if the Programme is to thrive.

1. What **enabling or co-ordinating activity** will support the delivery of the Programme? The consultation document offers a list of independent activities but it is not clear how these will be integrated to create a cohesive programme. We believe that responsibility will need to be allocated to a high-level individual or body to ensure momentum on these activities, for example ensuring progress, maintaining an understanding of the links between actions in different sectors and monitoring existing processes and commitment. It may be that this function will reside with Adaptation Scotland, although this is not explicit. Above this functional responsibility, it will be essential that a Minister with departmental support should have overall responsibility for enabling and coordinating delivery.
2. What actions will be taken to **integrate the research knowledge** that resides in ClimateXChange across the programme (e.g. baseline information applied in Adaptation Scotland's work with communities?).
3. There are very many events and actions listed in the Programme. A **timeline to show dates of key decisions or other actions** would be useful to aid planning. It could help to identify the **interdependencies** between linked but separate actions, to ensure that work in one area does not adversely affect others, for example, if policies are delayed.
4. While Ministers will be required to produce an annual progress report and there will be an independent assessment after 2 years, these appear to be unconnected, one-off activities. This misses the opportunity to review, learn and co-ordinate as the Programme evolves. We hope that there will be clear provision for **on-going monitoring and evaluation of the Programme**, with a particular remit to share learning across the Programme as well as contributing to the annual reports and the independent assessment.
5. Some policy actions described in the Programme appear less robust than others, e.g. B2-10 "regional marine plans should include policies with regards

to climate change mitigation and adaptation". How confident is the Scottish Government that these actions can be delivered? Are there **strategies for following up if these actions are not achieved?**

1b Does the overarching framework address the current and predicted impacts to Scotland identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly Tick one box only

Comments:

2 Views on the Natural Environment Theme

2a Do objectives **N1**, **N2** and **N3** collectively set an appropriate long term direction to ensure that Scotland's natural environment is able to adapt to our changing climate?

Fully Mostly Partially Poorly Tick one box only

Comments:

2b To what extent will the policies and proposals listed under objective **N1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

2c To what extent will the policies and proposals listed under objective **N2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

2d To what extent will the policies and proposals listed under objective **N3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

2e Taken together, do the policies and proposals listed under objectives **N1**, **N2** and **N3** address the current and predicted impacts to the natural environment in Scotland identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly Tick one box only

Comments:

3 Views on the Infrastructure and Built Environment Theme

3a Do objectives **B1**, **B2** and **B3** collectively set an appropriate long term direction to ensure that Scotland's buildings and infrastructure networks are able to adapt to our changing climate?

Fully Mostly Partially Poorly Tick one box only

Comments:

1. There are many actions listed and several policy areas covered in this section. What are the **priority areas**, and what plans are there to ensure that these will make progress in a timely and co-ordinated way?
2. **Long-term commitment** to the Adaptation Programme is likely to be dependent on the continuing support of Government departments and a variety of agencies and private sector bodies. How will this be supported and enabled?
3. What mechanisms will be put in place to **monitor and evaluate** the progress of these policy actions?
4. Most of the policy actions concern maintaining current practice or introducing fairly moderate and incremental changes. This may be appropriate for the lifetime of this Adaptation Programme. However, it may be worthwhile giving consideration to new, more sustainable ways of delivering infrastructure and the built environment in the very long-term. For example, how do we continue to deliver workplaces, services, healthy communities etc. This could be an opportunity to experiment with some innovative thinking around **transformative adaptation** that looks at new ways to provide the services to communities. Some projects in the ARCC network have started to look at this area of research (www.arcc-cn.org.uk). It does introduce a strong requirement for monitoring to identify when transformative adaptation is needed.
5. The **inclusion of energy efficiency measures** (e.g. B2-3) is unusual in an adaptation programme, so it would be helpful to be clearer about the contribution to adaptation made by these policies and actions, for example, the need to identify the viability and risks associated with energy efficiency

measures as a result of projected changes in climate and how these link to proposed adaptation measures.

3b To what extent will the policies and proposals listed under objective **B1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

1. It will be important to ensure that the policies and programmes listed make a real contribution to understanding the effects of climate change. For example, implementing the CNI strategy for Scotland will require **monitoring and follow up** to learn how well CNI is handling the demands of existing weather and climate factors and to make necessary adjustments.
2. To complement the evaluation of work in any one department, it will be necessary to evaluate the **links across sectors** (e.g. health).
3. It is good to see initiatives for future action, e.g. energy sector climate change impacts research programme. What mechanisms will be used to **share the outputs** more widely, to contribute to the exchange of knowledge and learning? The ARCC network could be one such route. It includes many research projects looking at aspects of infrastructure and the built environment, including work conducted in Scottish universities.
4. It will be important to include a thorough **understanding of vulnerabilities** for this sector, and to link these to the objectives and actions in the “society” theme.

3c To what extent will the policies and proposals listed under objective **B2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

1. We believe that there are **additional research activities and interests** which might be useful to refer to in the Programme. These include: Doctoral Training Centres, research into systems approaches to adaptation; and the benefit of interdisciplinary approaches to adaptation research. The ARCC network supports and enhances the skills base of its researchers. Across the ARCC network several Scottish universities are involved in delivering climate change adaptation research projects (www.arcc-cn.org.uk).
2. The **inclusion of energy efficiency measures** (e.g. B2-3) is unusual in an

adaptation programme, so it would be helpful to be clearer about the contribution to adaptation made by these policies and actions.

3d To what extent will the policies and proposals listed under objective **B3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

1. We are pleased to see that **amendments to building regulations** will be considered. For this to be effective, it will be important to ensure that there is: monitoring to check progress and implementation, opportunity to share learning from the process of changing the regulations and also from their application; and to seek an interdisciplinary, cross-sectoral approach.
2. The **ARCC network** supports the work of researchers investigating adaptation in the built environment and infrastructure sectors (www.arcc-cn.org.uk), and have the potential to contribute to the delivery of the Programme.

3e Taken together, do the policies and proposals listed under objectives **B1**, **B2** and **B3** address the current and predicted impacts to Scotland's buildings and infrastructure networks identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly Tick one box only

Comments:

1. The Adaptation Programme could be an opportunity to experiment with some innovative thinking around **transformative adaptation** that looks at new ways to provide services to communities. Some projects in the ARCC network have started to look at this area of research (www.arcc-cn.org.uk). It does introduce a strong requirement for monitoring to identify when transformative adaptation is needed.
2. As drafted, the Adaptation Programme still lacks detail on how the policy actions it lists so comprehensively will **be co-ordinated and delivered**.

4 Views on the Society Theme

4a Do objectives **S1**, **S2** and **S3** collectively set an appropriate long term direction to ensure that our communities are able to adapt to our changing climate?

Fully Mostly Partially Poorly Tick one box only

Comments:

4b To what extent will the policies and proposals listed under objective **S1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

4c To what extent will the policies and proposals listed under objective **S2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

4d To what extent will the policies and proposals listed under objective **S3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments:

4e Taken together, do the policies and proposals listed under objectives **S1**, **S2** and **S3** address the current and predicted impacts to Scottish society identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly Tick one box only

Comments:

5 Views on the Role of Others in Delivering the Programme

5a What support will public bodies require in meeting their duties to help deliver the programme?

Comments:

1. The Adaptation Programme highlights the valuable work of ClimateXChange, but it would be useful to acknowledge the other research work, including in

Scottish institutions, that is underway that would assist public bodies and other stakeholders to adapt to a changing climate. Work within the ARCC network is one such collection of relevant research, but there are other links, within the UK and internationally (e.g. CIRCLE 2, Horizon 2020 and FP7).

2. Adaptation Scotland and ClimateXChange are both organisations that are well-placed to assist public bodies and others to deliver their adaptation objectives. Both these organisations have a track record of contributing to a wider body of knowledge on adaptation to climate change. This helps to develop the pool of knowledge and experience on adaptation, both contributing to it, as well as taking away learning and examples. The Adaptation Programme would be enhanced if their continued involvement in this wider adaptation community could be supported.

5b Are the arrangements for ensuring public engagement and for involving employers, trade unions and other stakeholders in meeting the programme objectives sufficient?

Yes No

Comments:

1. Some of the other climate change bodies identified as partners seem to be more experienced in mitigation, not adaptation. Is the Scottish Government confident that they will have **sufficient adaptation knowledge** and capacity to assist the delivery of the programme? What support would there be to ensure that the relevant skills/experience are in place?
2. Several organisations are mentioned as delivering elements of the programme. How will their work be monitored and co-ordinated? In the absence of statutory requirements, what will ensure that their adaptation activities are given **appropriate priority**, given other demands on their resources?

6 Views on the Environmental Report

6a To what extent does the environmental report set out an accurate description of the current environmental baseline?

Fully Mostly Partially Poorly Tick one box only

Please give details of relevant sources:

6b Do you agree with the predicted environmental effects of the draft adaptation programme, set out in the Environmental Report?

Yes No

Comments:

6c Do you agree with the recommendations set out in the Environmental Report?

Yes No

Comments:

6d Do you agree with the proposals for monitoring of the environmental effects of the draft programme set out in the Environmental Report?

Yes No

Comments:

6e Are you aware of any further environmental information that will help to inform the environmental assessment findings?

Yes No

Please give details of relevant sources:

6f Are you aware of other 'reasonable' alternatives to adaptation programme and its content that should be considered as part of the SEA process?

Yes No

Please give details of relevant sources:

7 Additional Comments

7a Please provide any additional comments you would like to make on the draft Scottish Climate Change Adaptation Programme.

Comments: