

## Scotland's Climate Change Adaptation Programme 2019-24

### Overview

<i>General Comments</i>
<p>We are supportive of the proposals laid out in the consultation. We agree with the climate change Vision and Strategic Outcomes in the Programme and welcome the Scottish Government's alignment of this to the National Performance Framework Outcomes and the UN Sustainable Development Goals.</p> <p>We welcome that this is similar to the approach taken in other recent strategies (e.g. Environment), and feel that this will help to provide a consistent framework to co-ordinate policy and action across government. This is particularly important for the Climate Change Adaptation Programme, the outcomes of which are largely delivered through a number of different policy areas.</p>

### Detailed Response

<b>Specific Comments</b>

<b>1</b>	<p><b>Do you agree with our outcome-based approach to adaptation in Scotland?</b> <b>Yes; No; Unsure</b></p>
	<p>We welcome the focus on delivering outcomes through existing government policies and initiatives (e.g. National Flood Forum, National Transport Strategy).</p> <p>Delivering the seven Climate Change Adaptation Outcomes will need collaborative working across local and national government, and with sectors of the economy.</p> <p>We are committed to working in partnership to support the outcomes, and have experience in such an approach, for example: Edinburgh and Lothians Drainage Partnership, and Metropolitan Glasgow Strategic Drainage Partnership.</p>
<b>2</b>	<p><b>Do you agree that a National Forum on Adaptation should be established to facilitate discussion on Climate Change Adaptation?</b> <b>Yes; No; Unsure</b></p>
	<p>Whilst there is limited information on the way in which the Forum may operate, the principle of promoting collaboration and embedding monitoring and evaluation across the programme is welcome.</p> <p>We would welcome the opportunity to comment further on the remit of the Forum as it is developed, to focus on how we can help support it best.</p>

<b>3</b>	<p><b>Do you agree that Climate Change Adaptation behaviours should be included in the Programme?</b> <b>Yes; No; Unsure</b></p>
<p>Widely adopted, small behavioural changes are important to both mitigation and adaptation. The example given of flood protection for homes and businesses is a good illustration of how individuals' adaptation behaviours can radically improve their own resilience to climate change.</p> <p>We would add that collaboration, effective engagement and partnership working are important behaviours that should be demonstrated by organisations and their leaders in supporting long term climate change adaptation.</p> <p>It is important that there is a strategy to communicate these behaviours and benefits and provide support to deliver behaviour change.</p>	
<b>4</b>	<p><b>Do you agree that an integrated approach should be taken to monitoring and evaluation?</b> <b>Yes; No; Unsure</b></p>
<p>We welcome the adherence to key principles for monitoring and evaluation as set out in Annex B.</p> <p>With respect to principle 5, we note the intent to continue to use existing indicators and monitoring frameworks where appropriate. In doing this we would be happy to contribute to a review of the indicators, and have previously raised that some indicators developed may not have been truly reflective of climate change signals (e.g. spills from sewers). We welcome the focus on what we need to measure (rather than what we can measure) in determining if Climate Adaptation progress is being made.</p> <p>We support the intent to ensure the monitoring and evaluation is simplified. We suggest that the Scottish Government could take the opportunity to minimise burdens on organisations by reviewing SCCAP requirements alongside the Public Bodies Climate Change Reporting Duty.</p>	
<b>5</b>	<p><b>Do you agree with our long term vision for adapting to Climate Change in Scotland?</b> <b>Yes; No; Unsure</b></p>
<p>We agree with the scope of the Vision, which covers both the built and natural environments, and focuses attention on a resilient society and economy.</p>	
<b>6</b>	<p><b>Does the Programme identify the right outcomes for Scotland over the next five years?</b> <b>Yes; No; Unsure</b></p>
<p>In terms of content, the detail of the Outcomes set out within the document appears to encompass the correct themes and objectives.</p> <p>For example, Outcome 4 (Society's supporting systems) covers infrastructure, roads and utilities, whilst Outcome 1 (Inclusive, empowered communities) includes Scotland's buildings and places. Elements of both of these outcomes could be considered together.</p>	

7	<p><b>Are there any additional policies that should be included in the outcomes?</b> <b>Yes; No; Unsure</b></p>
<p>The policy areas are generally well covered, but we would make the following suggestions to better support the outcomes:</p> <p><i>Sub-Outcome 1.2 (Scotland's buildings and places are adaptable to climate change)</i></p> <p>This sub-outcome could include reference to planning legislation and the continuing Scottish Government planning review. This is a key lever with the ability to ensure new developments are built in a way that the homes and communities are adaptable and resilient to climate change.</p> <p><i>Outcome 3 (Inclusive and sustainable economy is flexible, adaptable and responsive to climate change).</i></p> <p>The document outlines the range of policy and action areas across the rural economy. In terms of a changing climate, it would be useful if Outcome 3 included a review of the implications of changes in farming and cropping practices on land and water. The Strategic Environmental Assessment (SEA) identifies risks such as drought to agriculture and public water supply, and it would be helpful if the importance of integrated water management were reflected in Outcome 3.</p> <p><i>Sub-Outcome 3.1 (Scotland's businesses based on natural resources are informed and adaptable to climate change)</i></p> <p>Although Flood Risk Management Strategies are mentioned in Sub-Outcome 3.2, and reference to farmers making space for water is made in the Adaptation Behaviours box, reference to the Flood Risk Management Act and policies on Natural Flood Management should also be included in Sub-Outcome 3.1. This should seek to support the farming community, land owners etc. in using their land differently to reduce the risk of flooding across catchments.</p> <p><i>Sub-Outcome 4.1 (the interdependencies of Scotland's infrastructure assets, systems and sectors are understood, and the risk of cascading failures is managed)</i></p> <p>The introductory paragraph references cascading failures, however the policies listed focus primarily within individual sectors and do not address interdependencies between systems. Specific policies may not yet exist, but it may be useful to set an action to review interdependencies. This could build on work already undertaken by the University of Edinburgh (understanding multiple hazards and risk from climate change on interdependent infrastructure in Inverclyde); and Anglia Ruskin University (RV-DSS: An industry-friendly resilience-based interdependency assessment tool - case study North Argyll).</p> <p><i>Sub-Outcome 4.2 (Scotland's critical national infrastructure, including essential services, is resilient to climate change)</i></p> <p>The section on water infrastructure focusses mainly on wastewater and drainage systems, and would benefit from inclusion of water supply assets as a further section, distinct from wastewater and drainage. Scottish Water's Water Resource Plan,</p>	

which considers the level of resilience of each water source, includes ongoing climate study work to ensure we are able to plan for this risk, and we would welcome further engagement to review this section of the programme.

Wastewater and drainage systems are combined within this section. Whilst Scottish Water is responsible for sewers and a number of surface water drainage systems, there are many drainage systems in our towns, cities and highways that are in the control of other agencies.

It is important to promote the importance of multi-agency/sector joint working in managing drainage risks from climate change. In addition to Scottish Water activities, this should reference ongoing Scottish Government-sponsored work to review drainage policy and guidance, and the Flood Risk Management Act (FRMA). The FRMA places duties on Responsible Authorities to reduce the risk of surface water flooding, taking into account climate change as part of any actions taken.

This may help to promote the integrated management of drainage by all parties to make our cities and towns resilient and adaptable to climate change.

8	<b>What are your views on the accuracy and scope of the Information used to describe the SEA environmental baseline set out in the Environmental Report? (Please give details of additional relevant sources)</b>
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The identified climate factors in Section 3 of the SEA Environmental Report (February 2019) appear to align well to the SCCAP outcomes, as well as providing a plan for each topic area.

9	<b>What are your views on the predicted environmental effects as set out in the Environmental Report?</b>
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If the predicted environmental effects can be achieved, this is positive for Scotland. We fully support partnership working to share knowledge and understanding across the scope of the SEA.

10	<b>What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?</b>
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Mitigation is an important part of the recommendations. That it is expected to have positive effects on climatic factors appears to be a reasonable conclusion. A case study or similar, illustrating the scale of such benefits, may be a useful addition.

The planned monitoring and evaluation framework for the second SCCAP appears to take a logical approach, and it will be interesting to see what sub-outcome indicators are selected.

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