
Report To:	Environment & Regeneration Committee	Date:	31 October 2013
Report By:	Corporate Director Environment, Regeneration & Resources	Report No:	R&E/R&E/FM/029
Contact Officers:	Fergus MacLeod	Contact No:	2404
Subject:	Scottish Government Consultation – Climate Ready Scotland: Draft Scottish Climate Change Adaptation Programme		

1.0 PURPOSE

- 1.1 The purpose of this report is to advise Members of the Draft Scottish Climate Change Adaptation Programme and the Council's response to the related consultation.

2.0 SUMMARY

- 2.1 The Scottish Government has, in accordance with Section 53 of the Climate Change (Scotland) Act 2009, prepared a Draft Scottish Climate Change Adaptation Programme. The Programme was the subject of a consultation during the summer months. The Council is a member of the Sustainable Scotland Network and participated in a consultation event held in August 2013 with the aim of forming a collective response to the Programme on behalf of the Network. The response is attached as an Appendix.
- 2.2 The Programme comprises three themes:-
- Climate Ready Natural Environment;
 - Climate Ready Buildings and Infrastructure Networks; and
 - Climate Ready Society.
- 2.3 Where possible, the language and expressions used in the Programme document are also used in this report.

3.0 RECOMMENDATIONS

- 3.1 It is recommended that the Committee:-
- note the Council's input to the collective response devised by the Sustainable Scotland Network to the Draft Scottish Climate Change Adaptation Programme; and
 - remit to the Corporate Director Environment, Regeneration and Resources to update Members, as appropriate, on potential implications for the Council when the final Programme is published.

Stuart W. Jamieson
Head of Regeneration & Planning

4.0 BACKGROUND

- 4.1 Section 53 of the Climate Change (Scotland) Act 2009 requires the Scottish Government to prepare a Scottish Climate Change Adaptation Programme. The Programme sets out Scottish Ministers' objectives regarding climate change adaptation, their proposals and policies for meeting those objectives, and the period within which the proposals and policies will be introduced. The Programme also sets out the arrangements for wider engagement in meeting those objectives.
- 4.2 The Programme comprises three themes:

<u>Theme</u>	<u>Outcome</u>
Climate Ready Natural Environment	A Scotland with a productive, healthy and diverse natural environment which is able to adapt to change.
Climate Ready Buildings and Infrastructure	A Scotland with well-managed, resilient infrastructure and buildings providing access to the amenities and services we need.
Climate Ready Society Theme	A Scotland with strong, healthy, resilient communities which are well-informed and prepared for a changing climate.

5.0 CONSULTATION

- 5.1 The Scottish Government sought views on the Programme as part of a formal consultation process.
- 5.2 The Council participates in the Sustainable Scotland Network, an organisation supported by the Scottish Government and which aims to help "the Scottish public sector to work together towards a sustainable Scotland".
- 5.3 The Sustainable Scotland Network facilitated an event in late August 2013 with the aim of providing a comprehensive and constructive response to the Programme's consultation. Inverclyde Council was represented at the event which gave delegates the opportunity to provide input to a collective response which the Network devised on behalf of its members. The response is attached as an Appendix (it should be noted that the text in italics relates only to the Sustainable Scotland Network).
- 5.4 There was no requirement to consult other Council Services regarding this report.

6.0 IMPLICATIONS

- 6.1 There are no direct financial implications arising as a result of this report:

Finance:

Cost Centre	Budget Heading	Budget Year	Proposed spend this report	Virement from	Other comments
n/a	n/a	n/a	n/a	n/a	n/a

Financial Implications – Annually Recurring Costs/Savings:

Cost Centre	Budget Heading	Budget Year	Proposed spend this report	Virement from
n/a	n/a	n/a	n/a	n/a

7.0 BACKGROUND PAPERS

- 7.1 The Draft Scottish Climate Change Adaptation Programme can be viewed on the Scottish Government's website: <http://www.scotland.gov.uk/Publications/2013/06/7592/downloads>.

8.0 CONCLUSION

- 8.1 The Scottish Government has published its Draft Scottish Climate Change Adaptation Programme and related consultation documents. It is proposed that Members note that the Council provided input to the Sustainable Scotland Network's collective response to the Programme. The Committee is also requested to agree to receive a further report, as appropriate, regarding the potential obligations on the Council arising from the publication of the final Programme.



SSN Response: Consultation on the Draft Scottish Climate Change Adaptation Programme

The Sustainable Scotland Network (SSN) supports public sector action on sustainable development. This includes programmes on climate change and sustainable procurement. The Scottish Government provides funding to Keep Scotland Beautiful to develop SSN and the SSN Steering Group guides the SSN agenda. Building on over a decade's work with local government, SSN is now opening up its support to the wider public sector.

SSN's consultation response process

This consultation submission draws on a number of Sustainable Scotland Network (SSN) information and research sources, including: analysis of the Year 5 reports from local authorities on Scotland's Climate Change Declaration (SCCD) published on 20th September 2013; regular communication with SSN members working in Scottish local authorities and the wider public sector; a number of network member organisational responses; and a dedicated consultation event which took place on 27th August 2013.

The SSN held a one-day consultation event focused on the Climate Ready Scotland: Draft Scottish Climate Change Adaptation Programme. The event, which was well-attended by network members (29 different public sector organisations, from across Scotland and across multiple sectors) incorporated elements of training and best practice sharing as well as sessions to discuss the consultation. Discussions from these structured sessions were noted and have been used to inform this response.

A few individual SSN members also shared their organisations' draft responses with us.

Furthermore, the SSN staff team at Keep Scotland Beautiful has analysed the programme and consultation questions and added feedback based on our professional experience and network knowledge of public sector climate change action and reporting. Where these insights are distinct from SSN member feedback they appear in italics.

Owing to the nature of the discussions during the SSN consultation event, we have grouped the most pertinent comments under the consultation questions

which pertain to the programme as a whole, as opposed to theme-specific questions.

SSN and climate change adaptation

The public sector in Scotland has demonstrated leadership on climate change. All 32 local authorities have signed Scotland's Climate Change Declaration (SCCD) and have for the third year in a row voluntarily reported on their Declaration commitments, including on adaptation. So while the publication of the Scottish Climate Change Adaptation Programme will bring into force the statutory Public Body Climate Change Duties on adaptation from the Climate Change (Scotland) Act 2009, SSN would like to note that projects and partnership initiatives to build organisational and area based climate resilience are already being implemented and reported on.

However the analysis of SCCD reports this year found that while there are notable adaptation projects and plans across Scottish Local Authorities, the Year 5 reports do not accurately encapsulate all of these. In many reports, mitigation projects were highlighted in the adaptation section, potentially highlighting that there still needs to be further work done in building capacity in understanding and implementing adaptation initiatives.

During a session at the SSN Adaptation Programme consultation event where participants discussed their current work on adaptation, many people reported that their organisation was conducting activities that addressed climate resilience, but that they were not necessarily coordinated under the banner of *climate change adaptation*. Many SSN members are trying to take stock of the activity that occurs within their organisation that is relevant to adaptation.

The SCCD analysis report does however show that the majority of local authorities have strong priorities detailed for 2013/2014 for adaptation – ranging from incorporating adaptation into other council plans, flood mapping and inclusion of adaptation within their Corporate Risk Register.

Details of SSN member reactions to the Draft Scottish Climate Change Adaptation Programme have been included in the attached form provided by the Scottish Government.

SSN continues to work closely with Adaptation Scotland to ensure that the Scottish public sector receives support to capacity building and to respond to a changing climate. This includes revisions to the SCCD reporting template and guidance to encourage and facilitate comprehensive reporting of adaptation related activities and close collaboration on the revision of the Adaptation Scotland public sector workbook. From experience, the support provided to public sector professionals by SSN and Adaptation Scotland is viewed by those professionals as extremely valuable.

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

Sustainable Scotland Network

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Forename

2. Postal Address

First Floor, Strathallan House,		
The Castle Business Park		
Stirling		
Postcode FK94TZ	Phone 01786 471333	Email ssn@ksbscotland.org.uk

3. Permissions - I am responding as...

Individual / Group/Organisation
Please tick as appropriate

<p>(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)?</p> <p>Please tick as appropriate <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis</p> <p>Please tick ONE of the following boxes</p> <p>Yes, make my response, name and address all available <input type="checkbox"/></p> <p>or</p> <p>Yes, make my response available, but not my name and address <input type="checkbox"/></p> <p>or</p> <p>Yes, make my response and name available, but not my address <input type="checkbox"/></p>	<p>(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).</p> <p>Are you content for your response to be made available?</p> <p>Please tick as appropriate <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>(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?</p> <p>Please tick as appropriate <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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:

Overall SSN members feel that the objectives detailed under the three themes set an appropriate long term direction for the programme. Through discussion of the consultation document SSN members noted their understanding on the development of the programme and understood that the programme was a working document that would evolve in response to further climate change risk assessments.

SSN members welcomed the broad and flexible nature of the overarching theme, in particular given the uncertainty around the full impacts of climate change. Members also noted that such a flexible programme could deal with a wide range of eventualities, in particular should additional risks be identified during the lifetime of the programme.

Common points raised by SSN members relevant to all 3 themes (natural environment, infrastructure & built environment, society) included:

- It was felt that there needs to be clear delivery plans to answer these questions:
 - How will this programme work in practice?
 - How will the programme influence local authorities and what projects will impact on them and when?
- The emphasis on understanding impacts in the first place in all three of the themes makes good sense as does the aim of increasing resilience.
- The engagement of stakeholders was felt to be vague. Who will make sure an action is delivered? It was also suggested that the 'action' and 'who' columns need to be more defined.
- In considering the consultation document, SSN also raised questions about who the programme was written for – is it for the Scottish Government to implement or public bodies or both? This needs to be clarified in the final programme.

- There doesn't appear to be clear delivery timescales for any of the policies and proposals (although these may be clear within the individual policy initiatives themselves). It was suggested that further clarity be given to which policies and proposals are underway and what needs to be developed.
- How will the programme be monitored and reported? For local authorities and public sector organisations, could this be through Scotland's Climate Change Declaration Reports, Sustainability Reports, or another reporting format? How do you report progress on an annual basis, if policies last for the duration of the programme or take 5 years to complete?
- It was also felt that some of the policies were too broad; for example 'Undertake Research'. Who will carry out this research, when will it happen and what is being researched?

There was a strong feeling that 'Climate Ready Economy' is significant enough to warrant its own substantive work programme. It is understood that Economy was 'scoped out' during the development of the programme, but network members felt that it needs to be addressed distinctly.

- *The over-arching framework does provide a focus for adaptation policy and action however the timelines of the policies and proposals listed is unclear. If public bodies are expected to deliver and report on these policies and proposals then guidance needs to be given in terms of when they are expected to be delivered.*

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:

- During the consultation discussion sessions, it emerged that network members felt it would be better to begin the programme document with the risks and clarify the actions already being taken to address these risks. Until it is established what is already being done to address distinct risks, it is hard to determine where the gaps and needs are.
- Members also felt they lacked a full understanding of all the risks identified in the Climate Change Risk Assessment. They understood that these were included within a separate appendix but they do not feel they currently have the capacity to understand the risks or to understand the implications of the programme and what it means for their organisations.

- Members felt that in order to deepen the understanding of climate change risks specific to Scotland, the programme should detail plans for a Scotland specific Climate Change Risk Assessment as an extension of the UK CCRA upon which the programme has been based. Members said that given the importance of understanding climate issues at a local level for effective adaptation planning, resource should be allocated to expand on the depth of Scottish-specific data sets.
- While it was detailed why certain risks were omitted from the programme, it was felt that some of the risks were not adequately addressed including:
 - ✓ Electricity infrastructure
 - ✓ Coastal erosion and peatlands
 - ✓ Pests and diseases
 - ✓ Private woodland management
 - ✓ Gardens and local greenspace
 - ✓ Freshwater fisheries
- *Overall, it was clear why impacts identified by the CCRA were scoped in/out of the programme. However, it was difficult to determine whether the programme addressed all the risks as they were detailed in a separate appendix. It is hoped that our network members (with a hands on approach to adaptation) will know whether the risks within their work are being addressed.*

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:

There is concern from network members that several key partners and stakeholders who could add huge value to projects and policies are not mentioned as such. In particular, Local Biodiversity Partnerships are widely seen as potentially important partners in many of the plans under objective N1. Furthermore, it is felt that the Citizen Science mentioned in N1-9 somewhat overlooks the vital role that established environmental and wild life record centres can play as a source of quality data, working in parallel with the organisations named as deliverers.

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:

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:

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:

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:

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:

Network members who are involved in planning at local authority level noted the importance of ensuring that the adaptation programme is read across all legislative programmes, in particular in this instance, Scottish planning legislation. It was noted that development siting, something within the remit of local authority planning departments in accordance with Scottish Planning Policy, has a significant impact on the social resilience and overall sustainability of an area.

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:

More reference could be made to the Scottish Government's work on the Community Empowerment and Renewal Bill, and its community regeneration and social inclusion policies more generally. Integration of climate change adaptation into these social programmes should be better highlighted in the programme.

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:

- There was a strong feeling that there should be more and continued support for Adaptation Scotland so they can continue to support the public sector and to develop their role further. Other government funded initiatives, such as SSN, should also play a key role in supporting the work of public bodies in this area.
- It was also felt that it would be useful to include an appendix which outlines the roles and responsibilities of each sector and how these are expected to be met.
- It was suggested that a clear statement from Scottish Government about the role of Community Planning Partnerships in working together to create and deliver localised climate change adaptation plans would be a useful driver for public bodies to meet their duties. This would seem an obvious extension of the obligation on NHS boards to have Climate Change Adaptation Plans.
- There was considerable discussion about how many of the policies and proposals would be funded and resourced. Members said that it would be useful to know at what stage of development these projects and policies were. Furthermore, members were keen to know what new projects were envisaged to implement the programme and where budget to support them would be sourced.
- It was also agreed that there was a need for the development of long term financial models. These would aid SSN members to help their organisations' finance managers to understand the long term payback for investment in adaptation activities and also the benefit of preparing for risks and costs avoided.
- Some SSN members felt a restructuring of the programme document so that the sections on partnership working, public engagement and collaboration sit towards the start of the document would be beneficial. This would clarify where public bodies fit with the programme and help clarify the status of the main programme commitments.
- SSN members noted the potential value of an increased move towards partnership working with the private sector, where there is potential for investment in research and action on climate change adaptation. This may be particularly pertinent in areas where upfront investment is needed given the limited funds for such available in the public sector at present.
- *Following the SSN consultation event, it was evident that many of the public bodies were unsure whether they were expected to deliver the policies and proposals. If public bodies are expected to do so, then they need to be informed of this.*

- *As mentioned above, the delivery timelines for policies and proposals within the programme are unclear. If public bodies are expected to report on these, then clarification of when they are expected to be delivered will be needed.*
- *In this instance, guidance on the format of reporting would also be required, and this should be integrated with reporting under Scotland's Climate Change Declaration and public sector Sustainability Reporting Guidance.*

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:

- It was felt that additional case studies to develop understanding and transferability of the policies and proposals would be very beneficial. This would ensure also that the message was delivered to a wider audience of public and professionals.
- Clearer links between compliance with public bodies' duties and implementing adaptation action would also make it easier to get senior management and elected member support.
- There also needs to be further information on what compliance with this programme would look like and support to develop partnership projects.
 - *At present, public bodies are unsure of the role they play in delivering the policies and proposals under the objectives. Further and more explicit arrangements are needed to clarify their role in delivering this programme.*

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: