

Agenda Item	19
Report No	FHR/132/13

**Scottish Climate Change Adaptation Programme: Draft Consultation Response**

**Report by Assistant Chief Executive**

**Summary**

This report sets out a draft response to the Scottish Government consultation on “The Scottish Climate Change Adaptation Programme”. The purpose of the consultation is to seek views on the overall framework and direction of the programme. The consultation questions and recommended response is presented at Appendix 1.

**1. Background**

- 1.1 This report presents a summary of a draft response from the Council to the Scottish Government’s (SG) [Scottish Climate Change Adaptation Programme](#). Although the consultation closes on 27<sup>th</sup> of September 2013, we have been given an extension so that the Committee can approve the Council’s response.
- 1.2 The programme identifies that the climate is changing and Scotland has to prepare for this. Adaptation is preparing for the future to manage the risks and opportunities from a change in climate.
- 1.3 The consultation asks questions regarding the overarching themes of an adaptation programme based in Scotland, the monitoring and reporting systems and stakeholder engagement. The programme addresses the issues and their impact for Scotland highlighted in the UK [Climate Change Risk Assessment](#) (CCRA).
- 1.4 The Council’s obligations regarding the provision of adaptation are defined in (Section 44) of the Climate Change (Scotland) Act 2009. Included in this Act is a requirement for the Council to; “in the way best calculated to deliver any statutory adaptation programme.”
- 1.5 The Highland Council outlines the need for adaptation in the [Single Outcome Agreement 2013/14 – 2018/19](#) which warns that public services will need to adapt to climate change and extreme weather events. The commitment to adapting to climate change is apparent throughout the Council’s 2012-2017 Programme: Working Together For the Highlands which commits to “support communities to be more resilient” by implementing the Council’s Climate Change Adaptation Strategy. There are also several programme commitments to infrastructure improvements. These sit alongside the Council’s commitments to reduce carbon emissions and its new initiative for a carbon CLEVER Highlands.

In 2009, The Highland Council published: [Adapting To The Impacts of Climate Change in Highland](#). It outlines potential threats to Highland and outlines an action plan to build adaptive capacity and become more resilient to climate change. This strategy is currently under review, with a view to revising the document and presenting it at a future meeting of the Finance, Housing, and Resources Committee.

## **2. Scope of Consultation**

2.1 The programme is structured around one overarching aim:

*'To increase the resilience of Scotland's people, environment and economy to the impacts of a changing climate'*

2.2 Three common themes sit under the aim:

1. Climate Ready Natural Environment Theme;
2. Climate Ready Buildings and Infrastructure Networks Theme; and
3. Climate Ready Society Theme.

2.3 The Consultation looks to obtain views on:

- The overarching framework;
- The role of public bodies; and
- The plan for stakeholder engagement.

2.4 A draft response to the consultation is attached at **Appendix 1**.

## **2.5 The Council's Response to the "Overarching Framework"**

The draft response attached welcomes the Government's Climate Change Adaptation Programme. The programme sets out national objectives that support the Highland Single Outcome Agreement (SOA) and makes it clear that Local Authorities have an important role to play in the delivery of adaptation. However, the draft consultation response highlights areas where the programme could be strengthened and where additional information would be useful. Key issues which the draft response highlights are:

- Additional information would be valuable to reinforce how proposed actions relate to the overall objectives.
- Setting out organisational responsibilities would highlight the scope of the proposed actions. Even when Local Authorities have been identified as a "delivery agent" the role and responsibilities are not always clear.
- The programme could be strengthened by showing the rationale for excluding specific programmes which address risks highlighted in the UK CCRA e.g. the proposed programme overlooks any peatland management policies which would target peatland degradation. As identified in the Highland SOA and UK CCRA peatlands are an important carbon store: Carbon is sequestered by a number of land uses and this must be managed appropriately.

**3. Resource Implications**

There are no resource implications arising from the draft response to the consultation; however some of the proposals being consulted upon would have resource implications for the Council if taken forward e.g. resources for engagement and awareness raising. The draft response comments that it would be useful if the programme provided more detail on adaptation resources for local action.

**4. Legal Implications**

The Highland Council's obligation is set out in the Public Bodies Duties defined in (Section 44) of The Climate Change (Scotland) Act 2009 which states "a public body must, in exercising its functions, act.....in the way best calculated to deliver any statutory adaptation programme; and in a way that it considers most sustainable." The draft response highlights where Government guidance can be strengthened to support the fulfilment of the Council's legal duties.

**5. Climate Change/ Climate Clever Implications**

An adaptation policy acknowledges and plans for the impacts of a changing climate and the need to be resilient and responsive to extreme weather events. Adaptation has been incorporated into both the Council's programme and the Single Outcome Agreement. A proactive adaptation plan will ensure that the Highlands manage the changes with minimal impact to services, communities and infrastructure. The Council also has commitments to mitigate against further climate change by working to reduce carbon emissions from its own operations and for the region as a whole, including through the new Carbon CLEVER initiative.

**6. Equality Implications**

The sparseness of the Highland region makes communities throughout the area more vulnerable to climate change. The consultation response has noted that vulnerable people may have a limited adaptive capacity, therefore would be useful for a mechanism to be in place to understand, identify and engage vulnerable individuals.

**7. Risk Implications**

Adaptation is about understanding what has to be done now and in the future. Planning for climate change through adaptation identifies risks and puts plans in place to reduce threats.

**8. Recommendation**

8.1 Members are asked to comment on and agree any changes to the draft consultation response attached at Appendix 1.

8.2 Members are asked to note that the Council's Adaptation Strategy is currently being reviewed and this will be brought back to a future meeting of the Finance, Housing and Resources Committee.

# 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

The Highland Council

Title Mr  Ms  Mrs  Miss  Dr  Please tick as appropriate

Surname

Forename

### 2. Postal Address

Highland Council Headquarters

Glenurquhart Road

Inverness

Postcode IV3 5NX

Phone

Email

### 3. Permissions - I am responding as...

Individual

Please tick as appropriate

Group/Organisation

- (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

## CONSULTATION QUESTIONS

### Introduction

The Council welcomes the opportunity to comment on the Scottish Government's consultation on the draft adaptation programme. It is supportive of many of the proposals and highlights where some helpful additions could be made.

The Council approved an adaptation strategy in 2012 and is currently reviewing its progress. Adaptation also features in the Highland Single Outcome Agreement with partners. This sits alongside the Council's efforts to mitigate against further climate change by reducing carbon emissions from its own operations. The Council has a new ambition for Inverness to be carbon neutral in a low carbon Highlands by 2025, branded as carbon CLEVER Highlands.

Responses to the consultation questions are set out below.

### 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 sets out objectives, proposals and policies and highlights a plan for wider engagement. However, it does not define a time period or prioritise actions.

The Scottish Government (SG) has taken a strategic role to ensure that Scotland adapts to climate change. SG's Scottish Adaptation Programme presents manageable information on likely future climate changes and a framework for integrated adaptation action.

Climate change is identified in the Highland Single Outcome Agreement (SOA) as an area for partnership action. Adaptation is an iterative process and the programme produces a direction to understand and tackle the potential negative consequences of climate change.

Adaptation is about understanding what has to be done now and later, and should be proactive and well as reactive. Therefore it would benefit the programme to set out defined time scales, a mechanism to show progress, and details expressing partner organisation's responsibilities.

It would be helpful to clearly define the short and long term policies and how they will achieve the objectives more coherently. Roles, responsibilities and statutory requirements of Local Government are understated, even when Local Government is highlighted as the "delivery agent". Communicating the expectations of public bodies in the programme more clearly would help to ensure the delivery of adaptation policies and programmes.

The programme is based on the UK Climate Change Risk Assessment (CCRA) which makes sense, and it might be more helpful if more reference was made to all policies that have adaptation implications. At the moment these are confined to the Strategic Environmental Assessment. Also it would be helpful if the programme could show how

the Government expects these related policies to work together to support the programme.

**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:

The overarching framework addresses the current and predicted impacts of climate change identified by the CCRA.

The CCRA helps to prioritise adaptation actions to ensure that critical areas of risk are addressed. This will ensure the issues and impacts of future climate change are clear from the start, and it defines the scope of the programme from its introduction.

It is accepted that the Highlands can expect a change in climate in forthcoming years. Planning for climate change with adaptation gives the opportunity to reduce vulnerability and recognise opportunities.

Constructing the programme around the CCRA successfully conveys the magnitude of potential risks to the UK. However, after scrutiny of both documents it is difficult to identify the programmes that have been successfully implemented to tackle potential risks.

Some risks are not scoped into the programme, such as peatland degradation. As identified in the Highland SOA, Highlands is an important carbon store: Carbon is sequestered by a number of land uses and this must be managed appropriately.

## 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:

The Natural Environment theme sets out a direction for Scotland. It outlines appropriate objectives to achieve the goals of the programme.

The programme successfully communicates that there is a clear multi-agency approach with peer review triangulated research, with the aim to develop the understanding of the effects of climate change and the potential impacts on the natural environment.

**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:

Understanding the potential impacts of climate change is the foundation for any future adaptation work. The Highland Council has a commitment to develop its own knowledge base on the effects of climate change on the natural environment and it is a key theme of the “Adapting to the Impacts of Climate Change in Highland” strategy.

It would be useful to highlight any relevant research and outline how it can be accessed and utilised.

It is encouraging to see the work being done to understand the potential effects that climate change may have on the natural environment. The Highland Council would like to see more research investigating new short term measures for soil conservation.

More effective language could be used to emphasise actions, e.g. policy N1-8 could be rephrased to eliminate confusion.

The focus of the natural environment theme is around research to build adaptive capacity, adaptation is about what has to be done now and later. By incorporating more short term adaptive actions into the programme would be valuable.

**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:

Policies in N2 provide an adequate focus for the lifetime of the programme. It would be useful to understand how these policies will work collaboratively. This would assist partners to share ideas and resources, and avoid duplication of effort.

It would be beneficial to include any on-going work regarding peatland in N2. The programme identifies good practise of peatland management in the narrative however does not list these in the policies and programmes section.

**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:

The CCRA identifies the vulnerability of peatlands, which are an important carbon store. However the programme fails to communicate any plans or programmes. It identifies good practise of peatland management, however falls short at incorporating it into the programme.

It would be useful to understand how emerging research, risks, and opportunities will be able to feed into the main adaptation programme.

### 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:

It clearly shows how SG plan to study and understand the effects and impacts of climate change on building and infrastructure networks. This will be particularly useful to Highland.

Highland Council covers a large and diverse area with an extensive coastline and inhabited islands and a mix of rural and urban communities. Prioritising work on the impact of infrastructure would be of particular interest to Highland as the risk and effect of disruption to infrastructure on communities is significant. Major investment and long term solutions have to be identified so that critical infrastructure can be adapted to a changing environment.

It would be helpful for the programme to address the retrofitting of existing properties as a priority. Incorporating measures to help individuals improve their own resilience through existing programmes would be beneficial.

**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:

The policies and programmes provide acceptable focus for the lifetime of the programme.

The Highlands cover a substantial area and has a growing built environment. Therefore it is a priority to ensure that the built environment is sustainable and has taken into account the changing climate.

**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:

The programme will create a starting point and baseline of information. It would be useful in this section to highlight more clearly examples of good practice and win-win adaptation examples e.g. incentives or regulation for private landlords to improve water efficiency and help address drought risk by installing low utilities.

**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:

Providing buildings regulations (B3-1) guidance is imperative in planning for adaptation. However messages have to be communicated effectively and implementation has to be monitored. Furthermore, progress has to be carefully scrutinised to ensure that individuals' living conditions are improved and do not deteriorate due to statutory requirements e.g. increasing air-tightness of dwellings can have a detrimental effect on properties and have consequences such as increased mould.

Improved clarity in the overall aim is needed as the ambiguity of the objectives could make it difficult to monitor progress.

**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:

#### 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:

Community engagement is essential. This will ensure that communities buy into adaptation with a level of interest and ownership. To realise this, it is important for the programme to empower Local Government to lead and inspire communities – communicating a vision and presenting a shared value in adaptation.

There is a need to consider the rationale of the climate adaptation actions and how they may affect communities over time. Understanding the effects of climate change and their impacts on homes and communities is critical whilst planning for climate change in Highland.

The objectives set out a long term direction to ensure that communities are able to adapt to climate change. Highland Council has incorporated community engagement into its adaptation programme to identify the needs of communities and to help build resilience.

The programmes and policies to understand the risks posed to society with a changing climate are encouraging. Understanding how vulnerable people are affected is specifically important and this should be a priority. Undertaking an impact assessment or equalities screening will not only assist SG and delivery agents in complying with statutory legislation such as the Equalities Act (2010) but it will aid in understanding the differential impacts of climate change and complex needs of vulnerable groups.

We welcome the plan for community engagement; Highland Council has implemented a community involvement initiative in which it was able to identify priorities and evaluate its own approach to adaptation.

There is scope to advance “socially just” adaptation. It would be possible to tackle procedural and distributive justice by targeting specific risks to individuals and by making an explicit role for third sector organisations.

Highland Council’s own experience in an adaptation community planning pilot in Gairloch has shown the need for communities to take ownership and lead on building resilience. Highland Council therefore appreciates the continued support of Adaptation Scotland.

**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:

Objective S1 shows a need for a partnership approach to identify the effects that climate change will have on people, homes and communities. If the policies in S1 are to be effective the objectives have to be clearly communicated at all levels. Defining roles and responsibilities will help partners understand the wider environment, what has been achieved and what needs to be done.

It would be particularly useful if the programme prioritised people vulnerable to the potential effects of climate change whilst developing an understanding of the needs and effects.

Scotland and Highland have an ageing population. It would be useful if the programme communicated the Government’s plans in the context of an ageing population.

**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:

There is a risk that policies and proposals under S2 may fail to engage the most vulnerable. Establishing effective and robust communication methods to ensure that those most immediately affected by severe weather events receive proactive, timely advice in the event of a crisis is essential. Creating awareness has to be the fundamental aim.

**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:

The emergency services ability to respond to increased pressure caused by the effects of climate change is fundamental to both increasing resilience and building adaptive capacity. However it is not clear how this objective fits under the Climate Ready Society Theme in the overarching framework.

**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:

Public bodies will need support delivering services and guidance on how to secure adaptation as a corporate priority.

The Highland Council has benefited from the support available through Adaptation Scotland and welcomes the commitment to ensure this organisation has the resources to support adaptation in Scotland. Imbedding adaptation in Public bodies is essential to ensure that appropriate measures are incorporated into day to day business.

The changing climate will affect how services are delivered. Severe weather events and climate trend changes will create challenges for public bodies throughout Scotland. Managing the range of services Local Authorities deliver will present specific local problems. SG's efforts to liaise on these issues at a national level are welcomed.

Increased incentives for public bodies to address climate change risks in a timely fashion would be beneficial. The development of an economic model and monitoring structure for Local Government would help to develop spend to save projects that deliver adaptation.

**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:

The Government's plan to engage with employers, trade unions and other stakeholders is a sufficient starting point for delivering the programme. Improved clarification on how the Government is going to monitor participation, what methods it proposes to encourage participation and the timeframe for engagement would be useful.

## 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:

Nothing further to add.