

Transport and Environment Committee

10am, Tuesday, 27 August 2013

Scotland's Climate Change Adaptation Programme: Consultation Response

Item number	7.11
Report number	
Wards	All

Links

Coalition pledges	P8 , P15 , P28 , P33 , P40 , P48 , P50
Council outcomes	CO8 , CO10 , CO14 , CO15 , CO16 , CO18 , CO19 , CO20 , CO21 , CO22 , CO23 , CO26
Single Outcome Agreement	SO1 , SO4

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Executive summary

Scotland's Climate Change Adaptation Programme: Consultation Response

Summary

This report proposes a response to [Climate Ready Scotland: Draft Scottish Climate Change Adaptation Programme](#), the Scottish Government consultation on its new programme to adapt to the impacts of climate change. The deadline for responses to the consultation is 27 September 2013.

Recommendations

1. To approve the response from the Council to the Scottish Government's draft Adaptation Programme, as set out in Appendix 1; to meet Scottish Government submission deadlines.
2. To note a Climate Change Adaptation Framework is being prepared by the City of Edinburgh Council in consultation with relevant stakeholders, and will be presented to Committee in due course.

Measures of success

Delivery towards statutory requirements, specifically the Climate Change (Scotland) Act 2009, which requires the Council to contribute to national emissions reductions targets, deliver any statutory adaptation programmes and act in a sustainable manner.

Delivery towards the Capital Coalition Pledge commitments and Sustainable Edinburgh 2020 objectives.

Delivery of an Adaptation Framework for the Council and the city, to help Edinburgh adapt to the unavoidable impacts of climate change in partnership with key stakeholders and local communities.

Financial impact

There are no immediate financial implications arising from this report, however in the longer term, adaptation initiatives will require additional expenditure to provide an effective response to this Adaptation Programme. The proposed response to Scottish Government makes it clear that new resources must be forthcoming to enable appropriate adaptation responses to be developed by local authorities.

Equalities impact

The delivery of social, economic and environmental sustainability objectives is closely aligned to equality and rights work and enables progress against the Equality Act 2010 duties to eliminate illegal discrimination, victimisation and harassment, advance equality of opportunity and foster good relations. In addition, progress in this area also enables the enhancement of human rights for citizens and service users.

Sustainability impact

The impacts of this report in relation to the three elements of the Climate Change (Scotland) Act 2009 Public Bodies Duties have been considered. The proposals in this report will increase the city's resilience to climate change impacts. When ratified, the Scottish Government's Programme will be used to ensure that the Council's own Climate Change Adaptation Framework is fully fit for purpose in terms of building resilience to the unavoidable impacts of climate change.

Consultation and engagement

All Service Areas within the Council were consulted to prepare this response. Responses received were taken on board.

Background reading / external references

- [Climate Ready Scotland: Draft Scottish Climate Change Adaptation Programme](#)
- [Scottish Climate Change Adaptation Programme – Consultation Document](#)
- [Climate Change \(Scotland\) Act 2009](#)
- [Scotland's Climate Change Adaptation Framework, Policy & Strategy Committee, 9 June 2009](#)
- [Sustainable Edinburgh 2020](#)

Scotland's Climate Change Adaptation Programme

1. Background

- 1.1 The Scottish Government published [Climate Ready Scotland: Draft Scottish Climate Change Adaptation Programme](#) for consultation on Friday 28 June. This is the Scottish Government's first Climate Change Adaptation Programme, required by Section 53 of the Climate Change (Scotland) Act 2009. Publication of the Programme will bring into force the adaptation requirement of the Public Bodies Climate Change Duties introduced by Section 44 of the Act. This requires that a public body, including local authorities, must, in exercising its functions, act in the way best calculated to help deliver the Programme.
- 1.2 The consultation is seeking views on the draft Adaptation Programme, which sets out Scotland's objectives, proposals and policies for addressing the impacts of climate change. The overarching aim of the Programme is "to increase the resilience of Scotland's people, environment and economy to the impacts of a changing climate".
- 1.3 The Scottish Government deadline for responses to the consultation is 27 September 2013.
- 1.4 The proposed Programme will replace the existing [Adaptation Framework](#). The Council submitted a response to the previous Scottish Government consultation on adaptation, which was approved by the Policy & Strategy Committee on 9 June 2009.

2. Main report

- 2.1 The consultation response has been prepared by the Carbon, Climate and Sustainability team (Corporate Policy and Strategy), Corporate Governance in consultation with the political groups and Council departments. The proposed Council response is detailed in Appendix 1.
- 2.2 The Council's proposed response broadly welcomes the Scottish Government's Draft Adaptation Programme, which indicates the way forward for how Scotland will adapt to the impacts of climate change, over the short, medium and long term.
- 2.3 The Council's response stresses the fact that local authorities will be on the front line in dealing with the impacts of climate change – not only in delivering

services but also (along with other partners) as leaders in their communities. It is felt that this statutory responsibility is not stated clearly enough in the Programme. The role of local government in adaptation needs to be emphasised better in the Programme overall and especially as a key delivery agent in relevant Programme actions.

- 2.4 Local authorities are regarded as “a major player” in climate change adaptation, according to the Climate Change (Scotland) Act 2009, and as such, significant funding will be required to fulfil the requirements of the Adaptation Programme. It is not specified how many of the actions in the Programme will be funded. Climate change impacts will place immense strains on public sector budgets.
- 2.5 The Scottish Government’s Adaptation Programme is structured around the three themes of natural environment, buildings and infrastructure networks, and society. The consultation questions are based around these themes, with additional questions on the overall framework of the Programme, the role of others in delivering the Programme, and the environmental report.
- 2.6 The Council welcomes the Scottish Government’s acknowledgement of local authority work under the Natural Environment theme, but feels that more weight should be given to the role councils play in safeguarding natural capital and raising awareness of the implications of climate change for nature. The Council’s response also expresses concern over how specific actions under this theme will be funded.
- 2.7 The Council’s response broadly agrees with the objectives set out under the Infrastructure and Built Environment theme, but would like to see more emphasis placed on statutory planning legislation, and more information on how measures will be funded. However the importance of the local authority’s role in planning, managing, developing, and maintaining local buildings and infrastructure, and historic sites and buildings, is not recognised. The Council’s response also raises concern over the issue of building resilience into housing especially climate-proofing new residential developments and retrofitting existing buildings. The Programme should more fully acknowledge this priority and indicate what additional funding will be made available to local authorities to facilitate appropriate actions.
- 2.8 The Council’s response welcomes the pivotal role of health and emergency services under the Society theme, especially in relation to vulnerable groups. However the Council is concerned that the role of local authorities as service providers and community leaders is underplayed.
- 2.9 As stated in the proposed response, the current text of the Programme does not adequately address in detail the economic risk and opportunities associated with climate change and the competitive advantages which will accrue from a climate-resilient economy.

- 2.10 Given the Council's statutory responsibility and existing commitment to climate change, a Climate Change Adaptation Framework for Edinburgh is being developed. The Council will work with key stakeholders across the city to develop this Framework. The Framework will incorporate the outcomes from the Scottish Government's Adaptation Programme, once it is finalised.

3. Recommendations

- 3.1 To approve the response from the Council to the Scottish Government as set out in Appendix 1 to meet Scottish Government submission deadlines.
- 3.2 To note a Climate Change Adaptation Framework is being prepared for the City of Edinburgh Council in consultation with relevant stakeholders, and will be presented to Committee in due course.

Alastair D Maclean

Director Corporate Governance

Links

Coalition pledges

P8 - Make sure the city's people are well-housed, including encouraging developers to build residential communities, starting with brownfield sites.

P15 - Work with public organisations, the private sector and social enterprise to promote Edinburgh to investors.

P28 - Further strengthen our links with the business community by developing and implementing strategies to promote and protect the economic well being of the city.

P33 - Strengthen Neighbourhood Partnerships and further involve local people in decisions on how Council resources are used.

P40 - Work with Edinburgh World Heritage Trust and other stakeholders to conserve the city's built heritage.

P48 - Use Green Flag and other strategies to preserve our green spaces.

P50 - Meet greenhouse gas targets, including the national target of 42% by 2020.

Council outcomes	<p>CO8 - Edinburgh's economy creates and sustains job opportunities</p> <p>CO10 - Improved health and reduced inequalities.</p> <p>CO14 - Communities have the capacity to help support people.</p> <p>CO15 - The public is protected.</p> <p>CO16 - Well-housed – People live in a good quality home that is affordable and meets their needs in a well managed Neighbourhood.</p> <p>CO18 - Green - We reduce the local environmental impact of our consumption and production.</p> <p>CO19 - Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and the delivery of high standards and maintenance of infrastructure and public realm.</p> <p>CO20 - Culture, sport and major events – Edinburgh continues to be a leading cultural city where culture and sport play a central part in the lives and futures of citizens.</p> <p>CO21 - Safe – Residents, visitors and businesses feel that Edinburgh is a safe city.</p> <p>CO22 - Moving efficiently – Edinburgh has a transport system that improves connectivity and is green, healthy and accessible.</p> <p>CO23 - Well engaged and well informed – Communities and individuals are empowered and supported to improve local outcomes and foster a sense of community.</p> <p>CO26 - The Council engages with stakeholders and works in partnership to improve services and deliver on agreed objectives.</p>
Single Outcome Agreement	<p>SO1 - Edinburgh's Economy Delivers increased investment, jobs and opportunities for all.</p> <p>SO4 - Edinburgh's communities are safer and have improved physical and social fabric.</p>
Appendices	<p>Appendix 1 – Draft City of Edinburgh Council Response to the Scottish Government's Adaptation Programme Consultation</p>

Appendix 1 – Draft City of Edinburgh Response to the Scottish Government Adaptation Programme Consultation

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

City of Edinburgh Council

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Croft

Forename

Nick

2. Postal Address

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Phone 0131 469 3726

Email Sustainability@edinburgh.gov.uk

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

- (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

- (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

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 Council feels that the Framework should reflect the five key themes identified in the CCRA Evidence Report, that is, Natural Environment; Buildings & Infrastructure; Health & Well-Being; Business & Services; and Agriculture & Forestry. A climate-ready flexible economy is desirable in order to respond to the uncertainties of future climate risks.

The Council acknowledges that local authorities will be on the front line in dealing with the impacts of climate change – not only in delivering services but also (along with other partners) as leaders in their local communities. The Council feels this statutory responsibility is not stated clearly enough in the framework, and the local authority role is not given enough weight in the Programme as a whole. Likewise, how many of these actions will be funded is not made clear.

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: It is the Council's view that the Framework does, in part, address the areas of risk identified in the UK Climate Change Risk Assessment. We would point out however that the risk assessment deals with "business" as a separate substantive issue and, as outlined above, it is the Council's view that this approach should be included in the Programme.

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 Council welcomes the acknowledgement the Programme gives to local authorities' role in flood prevention, green networks, forestry and woodland management, regional land-use and coastal management. Local authorities own and directly manage significant areas of woodland, greenspace and natural habitats, with a statutory responsibility to look after biodiversity –

Appendix 1

often in conjunction with expert and community partners. Additionally many of the natural assets owned and managed by local authorities will have a role in building community resilience to the negative impacts of a changing climate.

However, it is the Council's view that the natural environment theme fails to give sufficient weight to the valuable role local authorities' play in safeguarding local natural capital. This management role will represent a potentially increasing financial burden if local natural assets are to remain resilient to a changing climate. The financial implications of local authorities' role as an educator for residents, schools and students, businesses and visitors also need to be considered.

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: The Programme represents the first in a series of five yearly action plans, with an initial focus on research and data gathering. The Council would like to see more detail on how this programme of adaptation actions will be rolled forward for the longer term (over the next 50 years).

The Council welcomes the Programme's acknowledgement of the role local authorities' play in flood risk management but feel the importance of current, projected and future floodplain identification should be emphasised to give Planners the jurisdiction to ensure the long term view is taken into account. Our role in raising awareness of the implications of climate change for nature and the financial implications of this is also not acknowledged.

The Council feels that it would be appropriate to include additional measures focusing on the resilience of soils and iconic Scottish landscapes.

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: The Council feels that the Programme does not go into sufficient detail about specific actions that will be undertaken to support a healthy and diversely adapted natural environment, and how this will be funded at the local level. Again, the Council feels that the local authority role is not sufficiently acknowledged, as the major local guardian of the natural environment.

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?

Appendix 1

Fully Mostly Partially Poorly Tick one box only

Comments: The Council is disappointed that the Programme does not acknowledge the important role that local authorities play in sustaining and enhancing the benefits, goods and services that the natural environment provides.

This objective focuses on agriculture and fishing but the Council feels it should also include additional measures focused on the important role of ecological services in adaptation, for instance through measures linked to local authority planning and land-use policies (e.g. preventing development on current and future/projected floodplains) and the use of greenspace for carbon storage, heat reduction and water management.

Both the Programme and CCRA make only limited reference to ecological services. Recent studies of urban woodland in Edinburgh (i-Tree Project) have provided confirmation that local natural resources and ecological systems are a significant source of economic wealth. Climate change will adversely impact natural systems and the wealth they generate but N3 fails to acknowledge this. It is the Council's view that to help build resilience and adapt ecological goods and services to changing climatic conditions the Scottish Government should:

- Increase investment in research into evidence-based ecology to better understand the economic value of ecological goods and services.
- Employ strategies to manage the resilience of ecosystems as insurance against costly reductions in the supply of ecosystem goods and services
- Acknowledge the economic value associated with ecological protection and the maintenance of habitat resilience

The Council feels that further research would be desirable into the negative impact on wildlife, habitats and local communities that changes in the timing of seasonal events and migration patterns may have.

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: As stated in the previous sections, the Council believes that N1-N3 only partially address current and predicted impacts to Scotland's natural environment. The Council feels that following impacts should be addressed now or in the near future: biodiversity risks due to warmer rivers and lakes; changes in biodiversity reproductive habits; asynchrony between species breeding cycle and food supply; waterlogging; priority habitats lost due to coastal erosion; increase in prevalence of certain vector-borne diseases (ticks and lymes); decline in marine water quality due to sewer overflows.

Appendix 1

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 is the Council's view that this theme places too much emphasis on soft measures, such as research into understanding the effects and impacts, and not enough on 'hard' measures such as planning legislation to make developers and planners take adaptation into consideration in the design of new buildings and the refurbishment of older ones. Improving and increasing active travel infrastructure for cycling and walking in our urban environment should also be included in all new urban planning legislation to contribute to a healthier, greener and more sustainable environment. Also we feel there is no information on how delivery agencies will fund these measures.

The document does not adequately address the issues surrounding the retrofit of existing buildings and the challenges that this can bring especially with older buildings that may be difficult and expensive to improve, or in cases of mixed ownership where it may be difficult to organise repairs and improvements. We feel that this area is especially significant considering the fact that new build only accounts for a small percentage of buildings that could benefit from improved energy efficiency and resilience to climate change.

The local authority planning measures need to be strengthened not just for developers but also for residents to ensure that where they are planning a change/upgrade to their property they include run off and carbon capture measures – i.e. these measures should not be limited to new builds. More proactive measures need to be put in place by residents.

There is no mention of the introduction of Energy Efficiency Standards for Social Housing (EESH). While this will serve to improve standards for social tenants, the majority of homes in Scotland will not benefit from this. In Edinburgh, only 15% of households live in the social rented sector. Limited funding opportunities for other tenures mean that it will be more difficult for home owners and people living in private rented housing to prepare for issues associated with climate change.

Also, we feel there is no information on how delivery agencies will fund these 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

Appendix 1

Comments: The Council welcomes the Scottish Government's approach to evidence-based decision-making. However we note with concern that there is no research detail which specifically addresses local authorities in planning, developing and maintaining local buildings and infrastructure.

As stated in the previous answer, the local authority planning measures need to be strengthened not just for developers but also for residents to ensure that where they are planning a change/upgrade to their property they include run off and carbon capture measures – i.e. these measures should not be limited to new builds. More proactive measures need to be put in place by residents.

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 Council welcomes the Scottish Government's recognition of the importance of increasing knowledge, skills and tools in climate change adaptation. However with the exception of transport, there is no direct support being given to develop the skills and knowledge-base of local authorities who will be on the frontline in terms of reacting to climate change impacts and adapting public facing services to ensure long-term resilience.

In relation to protecting historic sites and buildings, there is no mention of local authorities, who own and manage a number of such sites and buildings. There is also no mention of the additional costs arising from the measures that may be required to safeguard collections from damage by climate change impacts such as increasing heat, damp, flooding and pest infestation, and the role culture can play in promoting good practice, disseminating knowledge and provoking discussion and action about climate change adaptation.

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: The Council would like to see more emphasis placed on building resilience into the transport infrastructure.

The Council expresses concern about the lack of direct or specific reference to the role of local authorities in the management and maintenance of buildings and essential infrastructure at a local level, and the increasing costs of building resilience in terms of investment and resources.

While the role of the Home Energy Efficiency Programme for Scotland (HEEPS) is referred to under B2, there is no direct reference to building resilience into existing housing and making provision for new residential developments that are

Appendix 1

climate-proof under B3. Local authorities are major providers of social housing, and work with a variety of partners to assist householders with improvements to promote energy efficiency. Similar work is needed in the short term to promote climate resilience in housing at a local level. The Scottish Government's Programme should acknowledge this priority and indicate what additional funding will be made available to local authorities to facilitate appropriate actions. There is no clear guidance as to how to prioritise resources necessary to make these policies work.

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: The CCRA identifies a number of issues that will need to be addressed in the longer term. These are not addressed in the current 5 year Programme, but the Council believes that work needs to start now to develop and understand these issues, and build opportunities for future programmes to address. These issues include: higher energy demand for cooling; heat damage/disruption to energy infrastructure; increased water demand for energy generation; overheating in buildings; the Urban Heat effect, measures to make landowners and property developers who manage vacant land (such as brownfield sites) take proactive action for carbon absorption (e.g. planting of appropriate small trees and shrubs) and buildings affected by subsidence. Limited reference is made to the specific issue of sea level rise and to related risks in the shorter term such as tidal and storm surges. It is the Council's view that additional measures are required to address the specific issue of sea level rise.

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: The Council feels that objectives S1-S3 collectively set the appropriate long term direction for ensuring adaptation at the community level, and cover the most important aspects of community resilience to climate change at this time.

The Council acknowledges that in this first five year programme there is a general emphasis on awareness raising activities and in developing a more in-depth understanding of risks and opportunities. We would expect that subsequent

Appendix 1

plans will be more action orientated at community level and appropriate levels of funding will be made available to local authorities and their community planning partners to ensure that this is achieved.

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: The Council welcomes the fact that S1 addresses the health, emergency services and community aspects of this objective, especially in relation to vulnerable groups. However we are concerned about the limited reference to the role of local authorities in understanding the impacts of climate change on communities, and the increasing and competing demands that will be placed on local authority public safety teams and where the additional resources will come from to fund these.

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: The Council feels that S2 is fairly comprehensive in addressing progress towards this objective but again feels that the role of local authorities as local service providers and community leaders is underplayed.

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 Council welcomes the Scottish Government's recognition of the crucial role that our health service and emergency responders will have in responding to the increased pressures associated with climate change, but again expresses concern that the role of local authorities, Community Planning and Neighbourhood Partnerships as emergency responders are not given sufficient recognition.

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: The CCRA identifies a number of issues of particular relevance to local authorities that will need to be addressed in the longer term. The Council

Appendix 1

believes that work will need to start now to develop and understand these issues, and build opportunities for future programmes to address. Issues we feel of particular relevance to local authorities include: community resilience to coastal erosion; further financial threats to vulnerable groups due to increased flood risk and severe weather events adding to existing fuel poverty issues; water quality issues; business disruption and tourism losses due to flooding; supply chain disruption affecting business output; ICT disruption; impact on outdoor leisure, sport and tourism; and impact on major outdoor events due to severe weather events.

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: Funding will be required to ensure that the correct infrastructure is put in place at the earliest possible stage to ensure that Scotland is able to deal with the impacts of climate change. At the local level, local authorities as “major players” will need to invest in buildings, transport infrastructure, flood prevention measures, coastal defences, greenspace and biodiversity, and in building organisational capacity in order to take action to reduce the risks and seize the opportunities resulting from changes in climate. This will need to be backed up by legislation and guidance to ensure that, for instance, developers follow planning regulations ensuring their developments are as climate resilient as possible. Finally, to ensure buy-in, resources will need to be provided for awareness-raising activities and behaviour change at the community, business and voluntary sector levels. This includes strengthening local authority planning measures for residents to ensure that where they are planning a change/upgrade to their property they include run off and carbon capture measures – i.e. these measures should not be limited to new builds. More proactive measures need to be put in place by residents.

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 is the Council’s view that the arrangements for ensuring stakeholder engagement in the Programme are not clearly defined in terms of how this engagement will be proactively taken forward, by whom, over what timeframe and by what measures.

6 Views on the Environmental Report

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

Appendix 1

Fully Mostly Partially Poorly Tick one box only

Please give details of relevant sources: The Council agrees that the SEA describes the principal environmental impacts arising from the changing Scottish climate. However, this is a complex issue which we would have expected to be covered much more comprehensively than is the case in the current SEA. The Council would refer to the detailed information hosted on, for example, Adaptation Scotland's website.

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

Yes No

Comments: The Council agrees that the SEA describes the principal environmental effects arising from the changing Scottish climate. However, this is a complex issue which we would have expected to be covered much more comprehensively than is the case in the current SEA. The Council would refer to the detailed information hosted on, for example, Adaptation Scotland's website. It is the Council's view that additional work needs to be done to describe environmental impacts relating to issues such as sea level rise.

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

Yes No

Comments: The Council agrees that the Scottish Government's Adaptation Programme will have a largely positive impact on the natural and built environment and on society. The Council also agrees that there are opportunities to introduce new measures to cover issues such as soil conservation, water quality, the resilience of the energy and food supply sector.

But, it is the Council's view that additional new measures are required to address the important issue of sea level rise which will present a number of significant risks to the natural and built environment and to society in both the medium and long term.

Generally, there is an over-emphasis in the first 5-year action plan on research and an under-emphasis on short-term new actions to build a resilient Scotland

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:

Appendix 1

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: Adaptation Scotland's website is a very useful source of collated environmental information. Work has been also been ongoing to develop an adaptation tool to be hosted on SEWEB (the Scottish Environmental portal). This has not yet been made publically available but will be a very useful adaptation tool when it does.

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: The role of local government in adaptation needs to be better emphasised and as a delivery agent in relevant programme's actions. The guidance clearly states that "Adaptation to the impacts of climate change is often most effectively implemented at a local level". The City of Edinburgh Council is a major player and as such, significant funding will be required to fulfil the conditions of the Adaptation Programme. There is no mention of how actions in the Programme will be funded. Climate change impacts will place immense strains on public sector budgets.

The Council expresses concern that there is no mention of how the previously published Adaptation Framework's more detailed 12 Sector Action Plans and their outcomes will be integrated into this Programme. There is also no indication of what progress has been made in terms of the individual actions outlined in the Sector Action Plans nor is there indication of how and where the draft Programme adds value to these previously published Action Plans.

The Council feels that more mention should be made throughout the Programme of the educational and enforcement roles which are essential to the success of many of the actions.

Preparation for adaptation to climate change is linked to the issue of uncertainty and the costs and opportunity cost of devoting resources to other needs. In many cases this will involve prioritisation of climate change adaptation over other issues and vice versa. Due emphasis needs to be given to this issue. There also needs to be due reference to doing things in order to adapt that may prove

Appendix 1

harmful (to people, the environment and/or the economy).

The current text of the Programme also fails to address in any detail the economic risk and opportunities associated with climate change and the competitive advantages which will accrue from a climate-resilient economy. There must be a realistic assessment of the disadvantages and the opportunity costs of climate change impacts and adaptation.

The Council feels the following should be looked at in the Programme:

- an improved understanding of the economic impacts of climate change that could occur throughout Scotland and how these will be distributed across regions and sections of society
- actions to address the predicted negative climate impacts of climate change to ensure that they must not outweigh benefits for most sectors that provide essential goods and services to society
- the secondary effects of climate impacts such as higher prices, reduced income, reduced home value and job losses.

The Council feels that better linkage should be made between 'green', 'blue' and built infrastructure¹.

¹ Green Infrastructure includes parks, open spaces, playing fields, woodlands, wetlands, grasslands. Blue infrastructure refers to water bodies, rivers, streams, floodplains and sustainable drainage systems.