

CLIMATE READY SCOTLAND: Scottish Climate Change Adaptation Programme 2019-2024 Strategic Environmental Assessment Post Adoption Statement

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1. Background

- 1.1.1. Climate Ready Scotland: Scotland's Climate Change Adaptation Programme 2019-2024 ('the Programme') sets out the Scottish Government's vision for a Scotland in which the built environment, natural places, supporting infrastructure, the economy and Scotland's people are adaptable and resilient to the effects of climate change. The Programme is available at:

<https://www.gov.scot/publications/climate-ready-scotland-second-scottish-climate-change-adaptation-programme-2019-2024/>

- 1.1.2. A draft programme was prepared in 2018 and was subject to Strategic Environmental Assessment (SEA) with an associated Environmental Report consulted on alongside the draft Programme. The consultation ended on 9 April 2019 with an analysis of the responses prepared by the independent consultants *Between the Lines* and published on 9 May 2019. The draft Programme, SEA Environmental Report and analysis of consultation responses can all be found on the Scottish Government Consultation Hub below:

<https://www.gov.scot/publications/climate-ready-scotland-scottish-climate-change-adaptation-programme-2019-2024-consultation-draft/>

2. The SEA Process and Findings

2.1. The SEA Process

- 2.1.1. The Environmental Assessment (Scotland) Act 2005 (the '2005 Act') requires public bodies in Scotland to carry out SEA on their plans, programmes and strategies. SEA is a way of examining plans, programmes and strategies as they develop, to identify any significant effects they may have on the environment. It ensures that environmental considerations are taken into account in the plan preparation. SEA also aims to build in mitigation measures, to avoid or minimise any potentially significant adverse effects on the environment, and look for opportunities to enhance a plan's environmental performance.
- 2.1.2. A joint Screening and Scoping report was prepared in September 2018 and responses were invited from consultation authorities on the scope of the SEA. All three consultation authorities (Scottish Natural Heritage (SNH), Scottish Environment Protection Agency (SEPA) and Historic Environment Scotland (HES)) submitted responses to the joint Screening and Scoping Report and these were used to inform both the development of the Programme and the following stages of the SEA assessment.
- 2.1.3. All environmental topics were scoped into the Environmental Report assessment. The assessment progressed alongside the preparation of the consultation draft programme and focused on the seven adaptation outcomes.
- 2.1.4. The Environmental Report was published alongside the draft Programme in February 2019 and was subject to public consultation in the period February-April 2019.
- 2.1.5. This Post Adoption Statement concludes the SEA process and includes information on how the responses received to the consultation and the Environmental Report have been taken into account in finalising Climate Ready Scotland: Scotland's Climate Change Adaptation Programme 2019-2024.
- 2.1.6. Section 18(3) of the Environmental Assessment (Scotland) Act 2005 sets out the information that should be included in the Post Adoption Statement. This can be summarised as:
 - how the environmental considerations have been integrated into the plan, programme, or strategy;
 - how the Environmental Report has been taken into account;
 - how the opinions of consultees have been taken into account;
 - the reasons for choosing the strategy as adopted, in light of the other reasonable alternatives considered; and

- the measures to be taken to monitor the significant environmental effects of the implementation of the plan, programme or strategy.

2.2. Integration of Environmental Considerations into the Scottish Climate Change Adaptation Programme 2019-2024

- 2.2.1. This section explains how key environmental considerations were identified and how these were taken into account in the development of the final version of Scotland's Climate Change Adaptation Programme 2019-2024.
- 2.2.2. Preparing the environmental baseline as part of the Environmental Report aided in taking into account environmental considerations in the development of the draft Programme. The emerging SEA baseline was used to inform discussions at six outcome workshops held during October, November and December 2018. The written outputs of these workshops were then fed into the development of the draft Programme.
- 2.2.3. In the preparation of the draft Programme, the Scottish Government ran an engagement campaign with external stakeholders and the public which aimed to raise the profile of climate change adaptation, gain support for the Programme and inform its monitoring and evaluation framework development.
- 2.2.4. Engagement was undertaken across three strands including digital engagement, outcome-focused workshops and climate conversations. The first strand, digital engagement, involved seven interactive Twitter events hosted by the Scottish Government, one for each outcome. These events were used to reach out to communities across Scotland and ask them about their experiences of climate change and priorities for climate change adaptation action.
- 2.2.5. The responses to the digital engagement were then fed into a second strand of engagement. Seven stakeholder engagement workshops took place across Scotland to enable engagement with key stakeholders on each outcome. The emerging SEA baseline was also used to inform discussions at the workshops, the written outputs of which were then fed into the development of the draft programme.
- 2.2.6. The final strand was climate conversations. The Climate Change Adaptation Conversations provide a step-by-step 'how to' guide for people to facilitate conversations about climate change adaptation with a small group of people. The Scottish Government identified relevant audiences with conversations enabling us to reach groups not likely to engage in the workshops. The purpose of these conversations was to discover people's priorities for adaptation, as well as raise awareness of the public consultation.
- 2.2.7. The seven adaptation outcomes in the consultation draft Programme were subject to environmental assessment with the results of the assessment informing their further development.

2.3. The Findings of the SEA

- 2.3.1. The SEA Environmental Report concluded that the draft Programme will have significant positive effects on climatic factors with positive effects in the medium to long term considered likely for all other environmental receptors assessed (biodiversity, population and human health, soil, water, air, landscape, material assets, and cultural heritage).
- 2.3.2. Key opportunities for enhancement were identified as part of the SEA process across five of the seven draft Programme outcomes. To realise the maximum environmental benefits within the Programme, there could be:
- a greater focus on actions which support the differing needs of communities, particularly those with increased vulnerability to climate change – both spatially (remote, rural, and coastal communities) and socio-economically (isolated and deprived communities);
 - an emphasis on multiple adaptation benefits, such as the adaptation of buildings to climate change resulting in the reduction of internal cold temperatures which has the potential to lead to a reduction in fuel poverty; and
 - a focus on protecting vulnerable cultural and marine heritage assets as well as wider locations and infrastructure with recognised vulnerability to the effects of climate change; these could include coastal and isolated locations, as well as power and fuel supply infrastructure; furthermore, consideration could be given to systems with climate change vulnerabilities such as those at risk of flooding, heat stress and slope instability.
- 2.3.3. Additionally, where future actions are identified as having the potential to result in uncertain or mixed adverse effects, further consideration should be given to mitigation measures at the individual project level. Existing consenting procedures can help address these at the local level.
- 2.3.4. Finally, the findings of the SEA support outcomes working towards an increased understanding and awareness of climate change adaptation. The SEA also identified that current adaptation strategies can benefit from research and further awareness raising to ensure the appropriate direction of resourcing and avoidance of unintended secondary adverse environmental effects.

3. Opinions expressed on Climate Ready Scotland: Scottish Climate Change Adaptation Programme 2019-2024

3.1. Introduction

3.1.1. This section sets out how the responses to the consultation on the Scottish Climate Change Adaptation Programme 2019-2024 have been taken into account as the programme was finalised.

3.1.2. In February 2019 Climate Ready Scotland: Scottish Climate Change Adaptation Programme 2019-2024: A consultation Draft was issued for consultation alongside the accompanying Environmental Report. The following seven questions were used to frame responses on the draft Programme:

- Q1. Do you agree with our outcome-based approach to adaptation in Scotland?
- Q2. Do you agree that a National Forum on Adaptation should be established to facilitate discussion on climate change adaptation?
- Q3. Do you agree that climate change adaptation behaviours should be included in the Programme?
- Q4. Do you agree that an integrated approach should be taken to monitoring and evaluation?
- Q5. Do you agree with our long term vision for adapting to climate change in Scotland?
- Q6. Does the Programme identify the right outcomes for Scotland over the next five years?
- Q7. Are there any additional policies that should be included in the outcomes?

3.1.3. Three questions were also used to frame responses on the Environmental Report and these are considered in **Section 4**.

3.1.4. Overall, the consultation received 73 responses from individuals and organisations with individual participants providing roughly one fifth of the responses (15 out of 73). The remaining 58 responses came from a broad range of organisations including local authorities, membership organisations, public bodies, environmental campaign groups, businesses, research and academic institutions, partnership organisations, 'other' third sector organisations and a primary school.

- 3.1.5. *Between the Lines* consultancy was appointed to undertake independent analysis and report on the consultation responses received. The analysis report presented qualitative themes in the data for each consultation question.
- 3.1.6. The final Programme draws heavily on the draft published in February 2019. Respondents said they wanted to see the vision for the Programme convey a strong sense of urgency and ambition, in line with the climate emergency, and link to urgent mitigation action. The responses strongly supported key features of the new Programme - linking to the UN Sustainable Development Goals and Scotland's National Performance Framework; an outcome-based approach; the establishment of a National Forum for adaptation; the inclusion of behaviour change; the integration of monitoring and evaluation from the outset; and taking into account the findings of the Strategic Environmental Assessment Report. Responses had many constructive suggestions on making the Programme as cross-cutting and effective as possible. Views on the seven high-level outcomes and the list of supporting policies were generally supportive with many suggestions for additional policies reflecting specific sectoral interests.
- 3.1.7. An overview of the comments received and our response to them is set out below.

3.2. The Outcome-Based Approach

Consultation responses

- 3.2.1. The majority of respondents endorsed the outcome-based approach to adaptation, highlighting the many strengths associated with this. Nearly half of respondents to this question reflected on the positive nature of the outcome-based approach and highlighted its wider links and alignment to the UN Sustainable Development Goals and the National Performance Framework.
- 3.2.2. A number of respondents to this question requested additional detail on certain aspects of the approach as well as on how the outcomes will be achieved. In addition, respondents called for the urgency to tackle and adapt to climate change to be relayed more clearly.
- 3.2.3. There was a strong level of support from nearly all respondents for the proposal to establish a National Forum on Adaptation with a number of respondents reflecting on the Forum's model, membership and remit.

Scottish Government response

- 3.2.4. In adopting an outcomes based approach, the Scottish Government is following high-level advice from the Committee on Climate Change¹. The Scottish Government has retained the original proposal of seven high-level outcomes derived from the UN Sustainable Development Goals and Scotland's National Performance Framework. The outcomes centre on:

communities, climate justice, economy, infrastructure, natural environment, marine environment, and international partnerships. The outcomes based approach allows adaptation to contribute to wider Scottish Government social and economic objectives. Programme for Government 2019-20 committed to establish a National Forum on climate change, once the Climate Change Plan update has been published in April 2020, to continue the conversation and bring together Scotland's businesses, public sector, communities and individuals so that everyone can be involved in the decisions we have to take.

3.3. Vision and outcomes

Consultation responses

- 3.3.1. The majority of respondents were in agreement with the draft Programme's overall vision and approach. A small number of respondents (five respondents) thought that the Programme does not identify the right outcomes for Scotland over the next few years.
- 3.3.2. A number of suggestions were also received on how the Programme could be further improved, including through an emphasis on a cross-sectoral approach to climate change adaptation and an emphasis on the need for systemic change to tackle climate change more generally. Opportunities presented by the Programme, such as adopting an ecosystem-based approach, were also highlighted by a small number of respondents. Participants who disagreed or were unsure about the proposed vision and outcomes attributed this to a number of reasons, including the need for greater clarity on timescales for achieving change.
- 3.3.3. Approximately half of respondents agreed with the draft outcomes as set out in the consultation. Over half of comments to this question suggested a wide range of further areas to be included in the outcomes section, including calls for greater clarity on actions, targets and indicators which underpin the outcomes. The analysis of responses provides further detail on suggestions directly related to each of the seven Programme outcomes.
- 3.3.4. Finally, a suggestion to include a set of performance indicators to accompany each outcome was also received with the respondent highlighting this will help quantify progress.

Scottish Government response

- 3.3.5. Consultation responses had many constructive suggestions on making the Programme as cross-cutting and effective as possible. Views on the seven high-level outcomes and the list of supporting policies were generally

¹ Committee on Climate Change (2018), ASC writes to Scottish Government about outcomes-based approach for the SCCAP [online], Available at: <https://www.theccc.org.uk/publication/asc-writes-to-scottish-government-about-outcomes-based-approach-for-the-sccap/> (accessed 16/01/2020)

supportive with many suggestions for additional policies reflecting specific sectoral interests.

- 3.3.6. The finalised Programme maps out the cross-cutting policy connections more clearly. It offers greater integration of adaptation across Scottish Government policies and closer alignment with key sectoral approaches than the previous Programme, for example: place-making, community empowerment, historic environment, nature-based industries, infrastructure, and ecosystems services.
- 3.3.7. The finalised Programme draws together in a systematic way those policies and proposals designed to address priority risks for Scotland identified in the UK Climate Change Risk Assessment 2017 National Summary for Scotland. The Programme includes seven research projects by ClimateXChange in the first year to specifically address recommendations made in Independent Assessments by the Adaptation Committee of the Committee on Climate Change (projects on: monitoring and evaluation, national economic assessment of flood risk, flood resilient properties, development in flood risk areas, recovery from extreme weather events, climate impacts on social care delivery, soil health). The Programme is designed to be flexible and evolve as new policies are rolled out.
- 3.3.8. The published Programme has developed further its approach to integrating monitoring and evaluation, with sets of indicators for outcome 5 on the natural environment and outcome 6 on the marine environment.

3.4. Climate Change Adaptation behaviours

Consultation responses

- 3.4.1. The majority of respondents agreed that adaptation behaviours should be included within the Programme with several respondents calling for a greater focus on systemic and organisational change in addition to these.
- 3.4.2. Nearly half of respondents provided further suggestions on how the Scottish Government can make a contribution and support behaviour change in the context of climate change adaptation. These included suggestions that climate adaptation behaviours should be reinforced through legislation or specific policies, as well as through tackling socio-economic barriers to change.
- 3.4.3. Nearly half of comments called for additional detail on the behaviour change proposals within the Programme and seven respondents called for clarity and greater detail on actions, timescales, responsibilities, monitoring; as well as greater evidence on the impact of individual behaviour change, and for the implementation of legislative intervention.

Scottish Government response

- 3.4.4. The published Programme contains specific sections on individual and societal behaviour change setting out practical examples for each of the seven outcomes.

3.5. An integrated approach to monitoring and evaluation

Consultation responses

- 3.5.1. The majority of respondents expressed support for the integrated monitoring and evaluation approach proposed in the consultation. Two thirds of participants suggested additional issues for further consideration by the Scottish Government and a number of respondents called for more detail to be provided on these proposals, as well as made suggestions on refinements to the proposals for the Scottish Government to explore. Examples of additional issues included the implementation of a mechanism to monitor the resilience of vulnerable communities to climate change risk. and specific proposals on effective monitoring approaches used within the private, public and third sectors.

Scottish Government response

- 3.5.2. The published Programme has developed further its approach to integrating monitoring and evaluation, with sets of indicators for outcome 5 on the natural environment and outcome 6 on the marine environment.
- 3.5.3. The Programme states that establishing a comprehensive monitoring and evaluation (M&E) framework is vital to ensure the effectiveness of Scotland's efforts to adapt to the impacts of climate change, identify whether resilience is increasing and opportunities are being realised, and ensure that reporting on progress and implementation is evidence-based.
- 3.5.4. The monitoring and evaluation framework for the second Adaptation Programme builds on the monitoring foundation established in the first Programme and has been developed in response to specific recommendations from both the Adaptation Sub-Committee (of the UK Climate Change Committee) and ClimateXChange to ensure that we can effectively monitor implementation of the Adaptation Programme and track progress towards the outcomes.

3.6. Policies to be included within each outcome

Consultation responses

- 3.6.1. The majority of respondents indicated that additional policies should be included in the outcomes with over half of participants making at least one suggestion or addition to this. These encompassed a broad range of topics, including farming, food security, waste management, soil health, oil and gas subsidies, air traffic, air quality and peatland management. In addition, respondents provided a number of specific examples and evidence to help inform future policy development on the subject.

Scottish Government response

- 3.6.2. Consultation responses had many constructive suggestions on making the Programme as cross-cutting and effective as possible. Views on the seven high-level outcomes and the list of supporting policies were generally supportive. In view of the many suggestions for additional policies reflecting specific sectoral interests, the finalised Programme draws together in a systematic way those policies and proposals designed to address priority risks for Scotland identified in the UK Climate Change Risk Assessment 2017 National Summary for Scotland.

3.7. Further comments

Consultation responses

- 3.7.1. There were a number of suggestions for Programme improvement, such as a stronger emphasis on cross-sectoral work and on the opportunities presented by climate change adaptation rather than on climate change risk.
- 3.7.2. Further to this, three respondents stressed in their comments a demand for local and project level approaches for the programme to be achievable. Three remarked on the need to keep it under constant review as climate change and its impacts are complex and ever-changing. One suggested the emphasis is on awareness raising and behaviour change without increased government support for structural change.

Scottish Government response

- 3.7.3. The new Programme offers key improvements over its predecessor 2014 Programme: the outcomes-based approach allows adaptation to contribute to wider social and economic objectives; the Programme is designed to be flexible and evolve as new policies are rolled out; greater integration of adaptation across Scottish Government policies and closer alignment with key sectoral approaches, for example: place-making, community empowerment, historic environment, nature-based industries, infrastructure, and ecosystems services; inclusion of adaptation behaviour change for the first time; and integrated monitoring and evaluation.

- 3.7.4. The challenges the new Programme faces are very clear. Scotland's climate is changing, and these changes will intensify. The cold winter and dry summer of 2018, along with the IPCC Special Report and new Climate Projections for Scotland published in 2018, indicate the challenges ahead and the benefits of being prepared.
- 3.7.5. Scotland has been preparing for climate change for over a decade, under our sector-based 2009 Adaptation Framework and our first statutory Programme in 2014. Scotland has already made a good start, as the first two Independent Assessments of our adaptation response have confirmed.
- 3.7.6. Our five Annual Progress Reports have shown how our response has grown from awareness-raising and knowledge-sharing to production of important guidance for the public and business sectors and inclusion of climate change in national strategies. We have a strong and enthusiastic community of climate adaptation experts and champions. We can demonstrate many examples of comprehensive climate risk assessments. A distinctive Scottish place-based model for adaptation, for example Climate Ready Clyde, has emerged.
- 3.7.7. New approaches to deal with the growing challenge are being brought forward: for example our Programme for Government commitment to Blue-Green Cities; Scottish Fire and Rescue Service's new approach to wildfires; and the enhanced climate resilience of the Queensferry Crossing, Scotland's largest infrastructure project in a generation.
- 3.7.8. Scottish Ministers want the new Adaptation Programme to deliver a step-change in collaboration and delivery of the wider co-benefits of climate action. We must secure the benefits of a climate-ready and resilient nation for current and future generations. Ensuring our communities, society, economy and environment are resilient to the expected intensifying impacts of climate change is a crucial step to delivering a greener, fairer and more prosperous country. Our shared vision is that we live in a Scotland where our communities, built and natural places, supporting infrastructure, economy and society are climate ready, adaptable and resilient to climate change. Adapting to the changing climate will both help to create a better society for everyone who lives here and unlock Scotland's immense potential as a nation.

4. Opinions expressed on the Environmental Report

4.1. Introduction

4.1.1. This section sets out how the responses to the Environmental Report accompanying the consultation on the Scottish Climate Change Adaptation Programme 2019-2024 have been taken into account as the programme was finalised. The following three questions related to the Environmental Report:

- Q8. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report?
- Q9. What are your views on the predicted environmental effects as set out in the Environmental Report?
- Q10. What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

4.1.2. Comments on the Environmental Report were received from a range of participants, including public and third sector bodies. These also included the three SEA statutory Consultation Authorities - Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH) and Historic Environment Scotland (HES).

4.1.3. 43 responses were received to Question 8 with 33 providing a comment, while Questions 9 and 10 received 42 responses with 30 and 33 substantive comments respectively. Overall, the comments received were generally supportive of the assessment process and of the findings set out in the Environmental Report. The views and comments received have been summarised below alongside the Scottish Government's response to them.

4.2. Accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report

Consultation responses

- 4.2.1. Just over half of the consultation participants (43 out of 73) responded to Question 8. Ten of these stated that they had no comment to make, or words to that effect, leaving 33 substantive responses for analysis. Two thirds (22 out of 33) of these responses conveyed general agreement with the accuracy and/or scope of the information, six participants made a general comment which did not express a clear view, four responses focused on aspects for further consideration, and another participant described their view as 'unsure'.
- 4.2.2. Positive reflections on the scope and accuracy varied, according to the respondent. Some shared general comments and observations; others highlighted specific aspects of the SEA they welcomed. Examples include comments on the alignment with the SCCAP outcomes, its extensive nature, and references to the considerable work undertaken in the development of the SEA. Some respondents confirmed their agreement without elaboration.
- 4.2.3. Just under a third of the respondents who provided a substantive response to question 8 (10 out of 33) indicated that they agreed with the overall accuracy of the report, but felt the scope was too broad or asked for greater focus on a specific issue. Two participants called for more reference to the urgent need to tackle climate change.
- 4.2.4. Respondents' suggestions of issues for greater coverage within the document varied, according to their specific area of interest or expertise. Some examples included further consideration of specific topics associated with biodiversity, human health and material assets.
- 4.2.5. The Statutory SEA Consultation Authorities also provided a number of comments relating to the environmental baseline, including a request for clarity on what was considered under the topic of climatic factors. They also recommended that future reviews of the SCCAP consider the topic of climatic factors in its wider sense and that SEA objectives in relation to the causes of climate change are included in future assessments.

Scottish Government response

- 4.2.6. We welcome the comments received. Where amendments or additions to the environmental baseline were suggested these have been noted and will be taken into account in future assessments where relevant. Where additional information has been suggested we are satisfied that this would not alter the assessment findings.
- 4.2.7. With reference to comments regarding consideration under the climatic factors topic specifically, the information used focused on the predicted likely effects of climate change and associated key pressures for Scotland. This approach was considered appropriate because of the focus of the programme on climate change adaptation specifically. The Scottish Government recognise the important links between climate change adaptation and mitigation. The programme's introduction recognises this in saying that Climate Change Adaptation and mitigation are intrinsically linked. Future iterations of the programme will consider developing these links further.
- 4.3. **Predicted environmental effects as set out in the Environmental Report**

Consultation responses

- 4.3.1. The SEA Consultation Authorities and respondents generally agreed with the predicted environmental effects set out in the Environmental Report. Just over half of the consultation participants (42 out of 73) responded to Question 9. Twelve of these stated that they had no comment to make, or words to that effect, leaving 30 substantive responses for analysis. Over half (18 out of 30) of these responses conveyed general agreement with the predicted impacts, and eight participants made a neutral or general comment which did not convey a clear view. Themes included agreement with the estimation of impact and disagreement or uncertainty concerning the predicted effects.
- 4.3.2. Over half of the substantive responses included comments indicating agreement that the predicted environmental impacts identified were reasonable. Four of these did not elaborate further, and five made additional positive comments about the scope, high-level approach, focus on specific issues or potential for the programme to achieve significant positive impact.
- 4.3.3. Four respondents made further comments on particular outcomes, including suggestions about widening or enhancing the scope to include effects on historical elements of the environment, mental wellbeing, catchment management and water supplies in rural areas and national food production, for example.

- 4.3.4. One participant disagreed with the predicted effects on the basis of them being too general, and another participant described their view as ‘unsure’, explaining that they did not feel mitigating actions were clear. Two respondents called for more urgency, and one suggested the impacts are underestimated but did not explain these comments.
- 4.3.5. One of the statutory SEA Consultation Authorities requested clarity on the predicted significant positive effects on climatic factors commenting that effects are limited to the context of adaptation and not the causes of climate change. Furthermore, they commented that predicted effects on SEA topics associated with adaptation behaviours are also largely limited to the context of adaptation to climate change.

Scottish Government response

- 4.3.6. The SEA identified likely significant positive effects across all SEA topics as a result of adaptation measures and accompanying plans which aim to maximise environmental benefits.
- 4.3.7. Taking account of the high level nature of the programme, the assessment identified an inherent degree of uncertainty regarding environmental impacts that may arise as a result of future actions undertaken to support adaptation outcomes. This includes a level of uncertainty and a potential for mixed/uncertain effects arising at the local level. This approach was considered proportionate to the strategic nature of the programme which set out a high level framework drawing together existing Scottish Government policies relating to climate change adaptation. With regards to comments suggesting that the assessment could have given more consideration to effects contributing to the causes of climate change rather than limiting these to adaptation specifically, as indicated previously we consider the overall assessment approach to be in keeping with the focus of the programme.

4.4. Findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report

- 4.4.1. There were 42 responses to Question 10. Nine of these were ‘no comment’ or similar, leaving 33 substantive comments for analysis. Many of the comments provided in response to question 10 reiterated participants’ responses to previous questions; reflecting their overall views on aspects of the draft programme.

Findings of the SEA

- 4.4.2. The majority view was of general agreement with the findings of the SEA. Eighteen participants indicated agreement with the findings, frequently highlighting elements that will support the achievement of outcomes such as the regulatory controls in place and the monitoring framework; one anticipated the National Forum on Adaptation will play a role in ensuring the Programme stays on track. Another highlighted their particular support for the opportunities for enhancement described within the document. Nine participants made general or neutral descriptive comments.
- 4.4.3. Eight participants disagreed with the findings, with varying explanations in their comments. Roughly half of this group (five respondents) made high-level observations. These included a general comment that issues had not been fully addressed, a view that 'more needs to be done', a call for the SEA to be more strategic with targets, actions and robust data analysis specifically. Another suggested that there should be clear links between the goals and identification of climate change risk. This respondent also felt there was an insufficient expression of the urgency of change required and mentioned an over-emphasis of and high expectations for the ability of behaviour change to effect impact.
- 4.4.4. Three disagreed on the basis that a particular topic needed greater prominence: one felt flooding should be reflected as the biggest climate change risk, one noted their disagreement on the basis that culture, and culture change are not addressed, another expressed a desire for the focus to be on the natural environment as the 'organising factor'.

Proposals for mitigation

- 4.4.5. Mixed comments on mitigation were received. Six respondents commented on mitigation. Three of these respondents shared general or descriptive comments in overall support of the approach and three suggested that more work is needed. Some felt the SEA should include greater coverage of mitigation measures, demonstrating how far identified mitigation measures have influenced the draft programme and how mitigation measures will be implemented. One participant suggested that a case study would be a valuable addition.

4.4.6. The statutory Consultation Authorities provided comments on mitigation and enhancement. These included a comment that the Environmental Report was not clear about how identified mitigation measures and enhancement opportunities have been or will be progressed. The Consultation Authorities also sought clarification on how mitigation identified within the Environmental Report has influenced the final Programme. Furthermore, a suggestion that where mitigation or enhancement proposals have not resulted in the modification of the final Programme, provisions for these as well as their timing and responsible body should be outlined in the Post Adoption Statement. Finally, a suggestion that project level regulatory controls, such as Environmental Impact Assessments, need to be augmented with more specific mitigation was included.

Monitoring of environmental effects

4.4.7. The majority of respondents were satisfied with the monitoring approach outlined. Over a third of the respondents who provided a substantive response to question 10 (14 participants) commented on monitoring, eight of whom were satisfied with the approach outlined. Three reiterated previous comments on the make-up or functioning of the governance body. These included suggestions that it should consist of non-governmental representatives from a range of sectors, take a multi-agency approach and report to Parliament through the Environment, Climate Change and Land Reform Committee.

Other comments

4.4.8. Other comments on communication and suggested additions to the SEA were also received. These included six comments on communication which mostly emphasised the need for wider publicity of the urgency of the climate situation to encourage behaviour change and adaptation action. Suggestions included placing climate change on curricula, legislation and introducing incentives to bring about change. Suggested channels such as Adaptation Scotland's website were also identified. Specific additions to the SEA were also suggested and included a case study to illustrate the benefits of mitigation and the need to monitor urban greenspace and reverse its decline.

4.4.9. The statutory Consultation Authorities' commented on reasonable alternatives and the possibility of a further iteration of the Environmental Report. With regards to reasonable alternatives, clarity was requested on whether reasonable alternatives within the seven adaptation outcomes were considered and if the consideration of high level alternatives (i.e. risk-led, sector priorities) identified prior to the preparation of SCCAP2 included environmental considerations. With regards to the possibility of a further iteration of the Environmental Report, one of the Consultation Authorities inquired as to whether the more detailed chapters for the final SCCAP2 could warrant a further iteration of the Environmental Report.

Scottish Government response

- 4.4.10. Comments have been noted and will be taken into account in future SEAs where relevant. Where suggestions regarding the content of the assessment have been made, we are satisfied that they would not alter the overall findings of the assessment.

In response to the comments received on how mitigation measures identified in the Environmental Report will be progressed, it is considered that the mitigation envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment in implementing the Programme as set out in the Environmental Report is proportionate and in keeping with the content of the programme. Where future actions have the potential to result in uncertain/mixed adverse effects, further consideration should be given to opportunities to mitigate any such effects at project level. In response to comments received on how enhancement opportunities identified in the Environmental Report will be progressed, the content of the finalised programme was expanded upon in response to both the consultation responses and the opportunities identified in the Environmental Report. To obtain the maximum environmental benefits for Outcome 1, content was further developed to focus on support for communities that are recognised as being more vulnerable to negative impacts of climate change. For example, the inclusion of the National Flood Risk Assessment (NFRA) 2018 under this outcome recognises vulnerable communities through its designation of areas in Scotland that are vulnerable due to current and future flood risk to people, the environment, cultural heritage and economic activity.

- 4.4.11. Comments received on monitoring are considered in **Section 6** below.

- 4.4.12. In response to comments received on reasonable alternatives, as the Programme developed the assessment approach was refined to focus on the seven adaptation outcomes. This approach was considered proportionate to the high level nature of the Programme itself. We note the comments regarding the possibility of a further iteration of the ER to reflect the expansion of the finalised programme following consultation. We consider that the focus of the assessment on the seven outcomes was proportionate to and in keeping with the strategic nature of the programme. Whilst it is recognised that the additional content provides further detail of actions that can support the delivery of the seven high level adaptation outcomes, we are satisfied that the further detail included does not alter the overall findings of the assessment as set out in the Environmental Report. Any further proposals, more detailed plans, programmes or strategies to give effect to the finalised programme would themselves require consideration under the Environmental Assessment (Scotland) Act 2005.

5. Reasons for selecting the Scottish Climate Change Adaptation Programme 2019-2024 as adopted

- 5.1.1. The 2005 Act requires that the Scottish Government identify, describe and evaluate the likely significant effects on the environment of any reasonable alternatives to the draft Strategy, taking into account its objectives and geographical scope.
- 5.1.2. Prior to the development of the programme, in January 2018, a workshop was held to consider approaches to SCCAP2. Getting the approach right from the outset was considered critical for developing a SCCAP2 that could deliver the adaptation objectives (high level outcomes) and integrate well with committed policy and action on climate change adaptation. As the programme developed, the assessment approach was refined to focus on the seven adaptation outcomes and this was considered proportionate to the high level nature of the Programme itself. The information gathered through the environmental assessment, and through the views and opinions of consultees, were used to inform the final programme.
- 5.1.3. The extent to which alternatives for the Programme could be considered reasonable was influenced by the relevant legislative requirements, the inherent uncertainty associated with predicting the impacts of climate change, and the significant proportion of committed policy and action embodied in the draft Programme.
- 5.1.4. During the process to develop the draft Programme, the Scottish Government considered alternatives including the ‘do nothing’ scenario and the theme based approach (in keeping with SCCAP1) and a sector-based approach. Early discussions with stakeholders informed the decision to take an outcomes based approach. “do nothing” was not considered a reasonable alternative because the requirement for a Programme is legally established and because it would not address the risks posed by climate change. A theme or sector based approach were also not considered reasonable alternatives because the actual content of the Programme would not be sufficiently different to give rise to different environmental effects. The Scottish Government remains of the view that the above options are not ‘reasonable alternatives’ for the purposes of the SEA.

6. Monitoring

- 6.1.1. Section 19 of the 2005 Environmental Assessment (Scotland) Act requires the Responsible Authority to monitor significant environmental impacts arising as a result of the implementation of the plan, programme or strategy. The purpose of the monitoring is to identify any unforeseen adverse effects at an early stage and to enable appropriate remedial action.
- 6.1.2. The Climate Change (Scotland) Act 2009 requires the laying of an annual report on progress towards the current adaptation programme. This provides the opportunity to regularly evaluate the progress towards meeting the outcomes laid out in the Programme and contributes to the ongoing monitoring process of the environmental impacts of the policies and research outcomes.
- 6.1.3. In light of the comments received on the draft programme and the Environmental Report, a Monitoring and Evaluation Framework was included in the published Programme, with initial sets of potential indicators for Outcome 5 and Outcome 6. The monitoring and evaluation framework for the second Adaptation Programme builds on the monitoring foundation established in the first Programme and has been developed in response to specific recommendations from both the Adaptation Sub-Committee (of the UK Climate Change Committee) and ClimateXChange to ensure that we can effectively monitor the effects of the implementation in practice of the Programme and track progress towards the outcomes.



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