



**Analysis of Responses:
Scottish Climate Change Adaptation Programme
2019-2024 Consultation Draft**

Final Report: May 2019

Conducted for:



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Riaghaltas na h-Alba
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EXECUTIVE SUMMARY

- i. In February 2019, The Scottish Government launched the consultation *'The Scottish Climate Change Adaptation Programme: A Consultation Draft'*¹. The national consultation forms a key part of the final stages of development for the second statutory five-year Climate Change Adaptation Programme due to be published later in 2019.
- ii. The consultation achieved 73 responses from individuals and organisations. Individual participants provided 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/academic institutions, partnership organisations, 'other' third sector organisations and a primary school.

Responses to the Proposed Overall Approach

- iii. There were sixty-nine responses to Question 1: *'Do you agree with our outcome-based approach to adaptation in Scotland?'* Of these, 65 respondents answered 'yes' indicating that they agreed with the outcome-based approach; 4 selected 'unsure'. Overall this indicates strong overall support for the approach put forward by the Scottish Government.
- iv. In comments, participants shared their views about the potential value of this approach and identified areas for further clarification. Other themes within comments included the need for cross-sectoral working and reflections on the scale and urgency of change required.
- v. There were sixty-eight responses to Question 2: *'Do you agree that a National Forum on Adaptation should be established to facilitate discussion on climate change adaptation?'* Of those, sixty-five respondents answered 'yes' indicating that they agreed with the intention to establish a National Forum of Adaptation; three selected 'unsure'. This demonstrates strong support for the proposal put forward by the Scottish Government.
- vi. In comments, participants shared their views about the need for a Forum and proposed suggestions about its membership, model and remit. Participants also identified issues for the Forum to focus on.
- vii. There were seventy responses to Question 3: *'Do you agree that climate change adaptation behaviours should be included in the Programme?'* Of these, sixty-three respondents answered 'yes' indicating that they agreed with the proposal to include adaptation behaviours within the Programme; seven selected 'unsure'. This indicates there is a strong level of support for the proposal put forward by the Scottish Government.
- viii. In participants' comments many reflected on the nature and scale of the behavioural changes required; some called for a greater focus on systemic change as opposed to change by individuals. There were also calls for more evidence and greater detail about the proposals and allocation of resources, roles, and responsibilities.
- ix. There were sixty-nine responses to Question 4: *'Do you agree that an integrated approach should be taken to monitoring and evaluation?'* Of these, sixty-five respondents answered 'yes' indicating that they agreed the approach should be included within the Programme; four selected 'unsure'. Again, this indicates there is a strong level of support for the proposal put

1 <https://consult.gov.scot/energy-and-climate-change-directorate/adaptation-programme-2019-2024/>

forward by the Scottish Government.

- x. Themes in the comments included reflections on the importance of monitoring and evaluation, calls for more detail and suggested refinements or models to explore.

Responses to the Proposed Vision and Outcomes

- xi. There were sixty-eight responses to Question 5: *'Do you agree with our long-term vision for adapting to climate change in Scotland?'*. Of these, fifty-three respondents answered 'yes' indicating that they agreed with the draft vision; ten selected 'unsure' and five answered 'no'. While overall this demonstrates a high level of support for the vision, the expressions of agreement, uncertainty or disagreement with this proposition were more mixed than those provided in responses to the overall approach.
- xii. In the explanatory comments, two thirds (31) agreed with the vision overall, but highlighted matters for further consideration by the Scottish Government. Eleven participants fully endorsed the vision and had no changes to suggest. Themes in comments included suggested refinements to the presentation of the vision, reflections on barriers, enablers, and opportunities. The five participants who answered 'no' suggested that they did so because they wanted the vision to convey a stronger sense of urgency and ambition.
- xiii. There were sixty-five responses to Question 6: *'Does the Programme identify the right outcomes for Scotland over the next five years?'*. Of these, thirty-seven respondents answered 'yes' indicating that they agreed with the draft outcomes; twenty-one selected 'unsure' and seven answered 'no'. Again, while overall this demonstrates strong support for the proposed outcomes, the expressions of agreement, uncertainty or disagreement were more mixed than those provided in responses to the overall approach.
- xiv. In over half of the comments there were references to further areas for consideration within the outcomes. There were reflections on the nature of outcomes, the extent to which participants consider them to be achievable, presentation of the outcomes, calls for greater urgency and some requests for additional detail or clarity.

Additional policies to include within the Adaptation Programme

- xv. There were 66 responses to Question 7: *'Are there any additional policies that should be included in the outcomes set out in the following pages?'*. Of these, 50 respondents answered 'yes' indicating that they thought additional policies should be included in the outcomes, 6 answered 'no' and 10 were unsure.
- xvi. In comments, 45 participants suggested at least one addition to the policies included in the draft Programme. They shared general reflections about the nature and connections between outcomes, their relative importance, and specific changes to particular outcomes. Participants also described examples and evidence to inform policy development in the future.

Responses to the Strategic Environmental Assessment

- xvii. Consultation questions eight to ten asked respondents for their views on the Strategic Environment Assessment. This is a detailed 73-page document which describes the impact on the environment of the draft Programme, as identified by the Scottish Government.

- xviii. There were 43 responses to Question 8: *'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?'* Twenty-two of these responses conveyed general agreement with the accuracy and scope of the information, six participants made a general comment which did not convey a clear view, four responses focused on aspects of the SEA for further consideration, and another participant described their view as 'unsure'. Ten participants stated that they had no comment or made words to that effect.
- xix. There were 42 responses to Question 9: *'What are your views on the predicted environmental effects as set out in the Environmental Report?'* Eighteen conveyed general agreement with the predicted effects, and eight participants made a neutral or general comment which did not convey a clear view. Four participants expressed uncertainty or disagreement with the predicted impacts. Twelve participants stated that they had no comment or made words to that effect.
- xx. There were 42 responses to Question 10: *'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?'* Eighteen participants agreed with the findings, nine made general or neutral descriptive comments, and eight participants indicated they disagreed with the findings, with varying explanations in their comments. Many of the comments reiterated participants' responses to previous questions.

1. Introduction

- 1.1 In February 2019, The Scottish Government launched the consultation *'The Scottish Climate Change Adaptation Programme: A Consultation Draft²'*.
- 1.2 This poses a range of questions about the second statutory five-year Climate Change Adaptation Programme ('the Programme'), due to be published later in 2019. The draft Programme provides a new framework that encompasses existing relevant policies that concern climate change adaptation. Building on the existing approach, it will focus on results, measurement and performance, reflect recent climate change projections plus an assessment of the current programme by independent advisers.
- 1.3 An outcomes-based approach connects the draft Programme with global goals and Scottish Government policies. For the first time, the Programme will explore how individuals, communities and businesses make decisions based on climate change factors.
- 1.4 Achieving the ambitions set out in the Programme will involve a range of partners, stakeholders and government departments including sectors which have not yet fully considered climate change adaptation.
- 1.5 The national consultation forms a key part of the final stages of Programme development. Questions cover complex and broad-ranging issues - including seven outcomes, various sub-outcomes, and the Strategic Environment Assessment, a detailed 73-page document which describes the impact on the environment of the draft Programme as identified by Scottish Government. The questions centre around three themes:
 1. The proposed overall approach;
 2. Proposed vision, outcomes, and associated policies; and,
 3. Views on the Strategic Environment Assessment (SEA) prepared in accordance with the Environmental Assessment (Scotland) Act 2005.

Profile of participants and engagement with the consultation

- 1.6 The consultation achieved 73 responses³ from individuals and organisations. Individual participants provided roughly one-fifth of the responses (15 out of 73); the remaining 58 responses came from a broad range of organisations. Categorisation by the analysis team revealed diversity among the organisations that took part in the consultation, as shown below:
 - Eleven local authorities, including Angus Council and Stirling Council.
 - Eleven membership organisations, for example, Built Environment Forum Scotland and RTPI Scotland.
 - Eight public bodies, such as Historic Environment Scotland and Transport Scotland.
 - Seven environmental campaign groups, such as Keep Scotland Beautiful and RSPB Scotland.
 - Seven businesses, including Smart Village Scotland.
 - Five research/academic institutions, for example, the Chartered Institute of Ecology and Environmental Management (CIEEM) and The James Hutton Institute.

² <https://consult.gov.scot/energy-and-climate-change-directorate/adaptation-programme-2019-2024/>

³ Two statutory consultees provided their responses in two parts; these were counted as one response per organisation.

- Five partnership organisations, such as the Central Scotland Green Network Trust and the Metropolitan Glasgow Strategic Drainage Partnership (MGSDP)
- Three ‘other’ third sector organisations, including the Climate Psychology Alliance.
- Children from Sunnyside primary school in Glasgow also submitted a joint response to the consultation.

Analysis and reporting

- 1.7** The Lines Between was appointed to undertake independent analysis and report on the consultation responses. Their analyst team developed a coding framework based on themes that emerged during the review and analysis process. Qualitative data (responses to open questions) was coded manually, according to specific themes; quantitative data was analysed with Excel. This analysis process enabled the team to group key messages that emerged from the responses.
- 1.8** An overview of the responses to each question is provided in this report; individual responses to the consultation are available for review on the Scottish Government’s consultation hub Citizen Space.
- 1.9** Qualitative themes in the data are summarised for each consultation question. While qualitative analysis of open-ended questions does not permit the quantification of results, the summary is presented by the frequency with which views were expressed; from most to least prevalent.
- 1.10** This report presents the range of views expressed and trends amongst responses. During analysis it became evident that a few participants repeated aspects of their responses across questions. In some cases, parts of a response aligned more closely with another question in the consultation document. To avoid repetition, analysis is presented under the most appropriate thematic heading.
- 1.11** At the end of each chapter quotes have been included to illustrate key points. These provide useful examples, insights and contextual information, but may not always represent the views of entire groups, such as organisations, sectors or geographic areas of Scotland. Where participants permitted their responses to be published, we have quoted directly. However minor spelling or grammatical errors have been corrected to improve readability.

Report structure

- 1.12** The Lines Between was commissioned ‘*to produce a clear and concise report for publication*’. This report presents the findings of the consultation analysis.
- **Chapter 2** presents a quantitative overview of responses to the consultation.
 - **Chapter 3** presents analysis of responses to the proposed overall approach.
 - **Chapter 4** sets out analysis of responses to the proposed vision and outcomes.
 - **Chapter 5** presents analysis of responses about any additional policies respondents would like to see reflected in the adaptation plan.
 - **Chapter 6** contains analysis of responses to the SEA.
 - Finally, **Chapter 7** includes conclusions and reflections for the Scottish Government to consider when developing the final Adaptation Programme.

2. Quantitative summary of responses

2.1 Table 2.1 provides a quantitative overview of consultation responses. It indicates where participants have selected 'yes', 'unsure' or 'no' in their response to a specific question, if a question has not been answered, and the number of comments made by participants in response to the question.

| Question | Yes | % Yes | No | % No | Unsure | % Unsure | Not Answered | % Not Answered | Comments |
|--|-----|-------|----|------|--------|----------|--------------|----------------|----------|
| <i>Proposed Overall Approach</i> | | | | | | | | | |
| 1: Do you agree with our outcome-based approach to adaptation in Scotland? | 65 | 87% | 0 | 0% | 4 | 5% | 4 | 7% | 52 |
| 2: Do you agree that a National Forum on Adaptation should be established to facilitate discussion on climate change adaptation? | 65 | 87% | 0 | 0% | 3 | 4% | 5 | 8% | 53 |
| 3: Do you agree that climate change adaptation behaviours should be included in the Programme? | 63 | 84% | 0 | 0% | 7 | 9% | 3 | 5% | 57 |
| 4: Do you agree that an integrated approach should be taken to monitoring and evaluation? | 65 | 87% | 0 | 0% | 4 | 5% | 4 | 7% | 47 |
| <i>Proposed Vision and Outcomes</i> | | | | | | | | | |
| 5: Do you agree with our long-term vision for adapting to climate change in Scotland? | 53 | 71% | 5 | 7% | 10 | 13% | 5 | 8% | 47 |
| 6: Does the Programme identify the right outcomes for Scotland over the next five years? | 37 | 49% | 7 | 9% | 21 | 28% | 8 | 12% | 57 |
| <i>Policies</i> | | | | | | | | | |
| 7: Are there any additional policies that should be included in the outcomes set out in the following pages? | 49 | 65% | 6 | 8% | 10 | 13% | 8 | 12% | 59 |
| <i>Strategic Environmental Assessment</i> | | | | | | | | | |
| 8: 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? | ~ | ~ | ~ | ~ | ~ | ~ | ~ | ~ | 43 |
| 9: What are your views on the predicted environmental effects as set out in the Environmental Report? | ~ | ~ | ~ | ~ | ~ | ~ | ~ | ~ | 42 |
| 10: 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? | ~ | ~ | ~ | ~ | ~ | ~ | ~ | ~ | 42 |

3. Responses to the Proposed Overall Approach

Introduction

- 3.1 This chapter presents an analysis of responses to consultation questions one to four, which asked participants for their views on the proposed overall approach put forward by the Scottish Government.

Chapter overview:

- Almost all respondents endorsed the outcome-based approach to adaptation proposed by the Scottish Government. Themes in the comments included: the many strengths associated with this approach; calls for more detail about aspects of the approach; reflections on the urgency of action required; and how to achieve the outcomes.
- Almost all respondents endorsed the proposal to establish a National Forum on Adaptation. Themes in the comments included: why a Forum is needed, suggestions for its membership, remit and role; and, issues for the Forum to focus on.
- Almost all participants agreed adaptation behaviours should be included within the Programme. However, caveats were expressed in relation to overall expressions of support. These included concerns about the focus on individuals, calls for more evidence, greater detail about the proposals and allocation of resources, roles and responsibilities.
- Almost all agreed with the proposal to take an integrated approach to monitoring and evaluation. Comments in these responses included reflections on the importance of monitoring and evaluation, calls for more detail and suggested refinements or models to explore.

Question 1: Do you agree with our outcome-based approach to adaptation in Scotland?

- 3.2 The outcome-based approach to adaptation outlined in the consultation document is highlighted below.

'We propose an outcomes-based approach, derived from both the UN Sustainable Development Goals and Scotland's National Performance Framework. In going beyond the sector and risk-based approaches of our 2009 Framework and 2014 Programme we are proposing a more strategic framework for the new Programme. It will promote co-benefits and integrate adaptation into wider Scottish Government policy development and service delivery. The approach is inherently cross-cutting, engaging sectors which have not yet fully considered climate change adaptation'.

A quantitative overview of responses

- 3.3 There were 69 responses to Question 1. Of these, 65 respondents answered 'yes' indicating that they agreed with the outcome-based approach; 4 selected 'unsure'. None of the consultation participants answered 'no' to convey disagreement with the approach. Overall this indicates a strong overall level of support for the proposal put forward by the Scottish Government.

- 3.4 Nearly two thirds (52 out of 73 consultation participants) provided an explanatory comment in addition to their yes/unsure answer. These offer greater insight into participants' responses to the proposed approach including their views about its potential value and areas for further clarification. Themes in these responses are summarised below.

The value of the proposed outcome-based approach

- 3.5 Most common was some form of reflection about the overall strength of the approach. In almost all of the comments (41 out of 52 qualitative responses), there was a suggestion that an outcomes-based approach was welcome and necessary. Just under half of those who provided a comment (23 respondents) reflected on the crosscutting nature of the outcomes-based approach, citing as positive, for example, its links to the UN Sustainable Development Goals and Scotland's National Performance Framework.
- 3.6 Roughly one-fifth of the comments (10 respondents) contained an acknowledgment that the outcomes-based approach will ensure that progress is tracked and monitored effectively. Some of these respondents also suggested the outcomes-based approach is of a holistic and long-term nature.
- 3.7 A few suggested the approach will promote coordinated working across sectors. However, a small number of participants (4 respondents) referenced the unpredictable nature of climate change and therefore the difficulty of creating appropriate outcomes to prepare for any eventuality.
- 3.8 Other comments on the value of the outcome-based approach included:
- Reference to other successful outcomes-based approaches in place; noting the appropriateness that the Adaptation Programme should follow suit. (7 respondents).
 - An observation that the approach delivers a clear overall message, as opposed to the confusion that can stem from conveying many policy objectives. (4 respondents).
 - Suggestions that the approach incorporates a shift from a focus on the risk associated with climate change, to consideration and identification of some other benefits linked to adaptation. (3 respondents).
 - A concern that the approach might encourage a focus on short-term goals. (2 respondents).
 - A perception that the approach could help to increase transparency in climate change adaptation activity and resourcing. (2 respondents).

Calls for more detail

- 3.9 The second most common theme in qualitative responses was a call for more clarity in relation to the outcomes-based approach; this was identified in just under half (22 out of 52) of responses. Specific matters for further consideration included:
- Setting measurable indicators and targets linked to specific outcomes to effectively monitor progress (12 respondents). In some of these responses participants also queried how the progress from the sub-outcomes will be monitored, in relation to achieving the higher-level outcomes. One suggested the proposed adaptation response to the risks identified by the UK Climate Change Risk Assessment were not clear, noting the Climate Change Act requires these to be explicit.

- A small number requested clarity around how their sector is expected to respond to and deliver the outcomes. They also suggested the allocation of responsibilities for public bodies such as local authorities in achieving the outcomes. (4 respondents).
- Two respondents commented on the need to include realistic timescales in the outcomes-based approach. They discussed this concerning the urgency and threat of climate change; one requested clarity for the outcomes extending beyond the 5-year period of the new programme.
- One asked for an additional diagram to display the links between sub-outcomes and higher-level outcomes within each of the adaptation outcome sections.

Cross-sectoral approaches

3.10 Roughly one-fifth of the consultation participants welcomed the emphasis on cross-sectoral approaches in climate change adaptation (10 respondents). However, two felt the Scottish Government should go further in encouraging involvement from sectors that are not currently engaged in active adaptation planning.

The scale of change

3.11 Just under a fifth of the explanatory comments referenced the urgent need for a comprehensive and systematic change to prepare for the consequences of the changing climate (9 respondents). Within these responses, two participants suggested there should be a greater focus on reducing emissions within the Programme. Two called for more specificity and suggested the language used in the outcomes-based approach does not indicate the appropriate level of urgency. One reflected on an opportunity linked to the scale of the change; highlighting job creation associated with the shift towards a low carbon economy.

Uncertainty about the outcomes-based approach.

3.12 As noted at 3.3 above, 4 of the 69 respondents who provided a yes/no/unsure response to question 1 selected 'unsure'. Three of these participants shared comments with their response; all suggested that they broadly agreed with the principle of the proposals, but conveyed reservations, summarised as follows:

- One indicated that outcome approaches are only appropriate in stable situations; they argued that the proposed Programme outcomes, in reflecting the volatility of climate change, are too high-level and therefore too general to be effective.
- Another suggested that adaptation requires a process-driven as opposed to an outcomes-based approach to change.
- Another describes strengths in the proposed approach but called for more detail to deliver clarity about adaptation actions.

Other comments

3.13 Other views and suggestions from consultation participants about the outcomes-based approach included:

- Four respondents suggested the draft programme should include dedicated resources to achieve the desired outcomes. Two of these highlighted the resources needed to promote relationships and information sharing between communities to mitigate the effects of climate change. One respondent said the Scottish Government would need to provide appropriate resources set at a local level to monitor the outcomes;

another called for resources to develop a cost-effective action research plan to address all risks.

- Two participants commented on the outcomes-based approach concerning behaviour change. One of these discussed the need to respect the livelihoods of those most affected by climate change when encouraging them to change behaviours; another questioned whether the Scottish Government’s ambitions for behaviour change go far enough.
- Two respondents suggested that adaptation measures should have the flexibility to respond to complex local contexts. For example, one highlighted the specific socio-economic diversity within Glasgow and its rich cultural heritage; noting that a one-size-fits-all approach would be unlikely to achieve the desired effects.
- One respondent suggested there should be more acknowledgement of the adaptation work currently being undertaken by local authorities in the Programme; another felt the consultation document could be expanded, with more discussion of the global context.
- Five participants shared their views about specific outcomes in responses to question one. To avoid duplication within the report, these are covered in Chapter 6.

A sample of illustrative quotes that typify the themes identified in responses to Question 1

“ *A focus on outcomes should direct actions towards achieving Scottish Government’s ultimate goals in adapting to climate change. This more strategic approach is certainly needed to deal with the scale of system transformation required to cope with our changing climate. It should also ensure better integration with wider policy, service delivery, and for engaging with sectors not yet considering climate change adaptation. [Stirling Council]*

“ *It (an outcomes-based approach) takes us beyond what was an unhelpful and limited focus on climate change risks, which tended to encourage silo'd thinking about risks in isolation, and failed to stimulate the systems approach that successful adaptation requires. [RSGS; independent]*

“ *We welcome the alignment of an outcomes-based approach with the United Nations Sustainable Development Goals. Such an approach should help alignment of policy and action and with other evolving strategies. [The James Hutton Institute]*

“ *Measuring, analysing, and then redirecting is the only way to drive an improvement process. However, the outcomes are generally defined and hard to quantify - therefore there should be a set of performance indicators to accompany each outcome. [Individual]*

Question 2: Do you agree that a National Forum on Adaptation should be established to facilitate discussion on climate change adaptation?

3.14 The proposed National Forum on Adaptation is described below.

'In line with the Paris Agreement and EU Adaptation Strategy, we want to deliver a step change in collaboration and propose establishing a National Forum on Adaptation, similar to Ireland's National Adaptation Steering Committee. The Forum will include senior representatives of key sectors and will improve both leadership and collaboration'.

A quantitative overview of responses

3.15 There were sixty-eight responses to Question 2. Of those, sixty-five respondents answered 'yes' indicating that they agreed with the proposal to establish a National Forum of Adaptation; three selected 'unsure'. None of the participants answered 'no' to convey disagreement with the proposal. Overall this indicates there is a strong level of support for the proposition put forward by the Scottish Government.

3.16 Nearly two thirds (53 out of 73 consultation participants) provided an explanatory comment in addition to their yes/unsure answer. These typically included views about the need for the Forum, and reflections on its membership, remit and role; and issues for the Forum to focus on. Themes in these responses are summarised below.

The need for a National Forum

3.17 Almost two-thirds of those who commented on question two explained the basis of their support for the creation of a National Forum (34 respondents). Within these responses, a range of points were raised. Many expressed appreciation that both the public and a range of sectors will be encouraged to participate, highlighting the need for collaboration and knowledge exchange as essential in achieving effective adaptation. (26 participants).

3.18 In these comments a small number of participants reflected on important, specific tasks they expect the proposed Forum to take on. They include clarifying Scotland's duties in responding to climate change, identifying resources necessary for mitigating effects, and facilitating the enactment of recommendations contained within the UK Climate Change Risk Assessment.

Membership of the National Forum

3.19 Over half of the comments relating to question two included general reflections or specific suggestions about the membership of the National Forum. Ten participants suggested it should be broad-ranging, encompassing representatives from all sectors that can effectively contribute to the mitigation of climate change, not just the sectors already engaged. A few asked for details on selection criteria, and the sectors that will be included in the National Forum.

3.20 Other themes within the comments on membership included thoughts about representation as a means to maximise knowledge, reach and impact. For example, five respondents asked for consideration of diversity within the membership with particular regard to socio-economic inclusivity. Four respondents called for the Forum membership to have an active reach among stakeholders and communities across Scotland. Two respondents suggested that the membership should include those with experience of implementing climate change adaptation; not solely policymakers.

3.21 Another respondent called for senior members of the government to attend the meetings, reflecting the importance of the Forum's work. One participant advocated for central management of the National Forum.

The Model and Remit of the National Forum

3.22 Just under half of the comments about the National Forum concerned its model and remit. (21 participants). Six respondents called for the Forum to have decision making powers. Four respondents requested greater detail and clarity around the remit of the Forum, including whether or not it will exert power in an advisory capacity to policymakers, and how its members will be recruited.

3.23 Other comments in relation to the Forum's model and remit included:

- The need for a means of delivering action from the Forum at a local and regional level (3 respondents); one participant suggested that alongside the Forum, an intermediary was required to implement the practice within communities.
- One respondent highlighted the work of the New Zealand Climate Change Adaptation Technical Working Group, comprising public and private sector representatives, as a well-functioning model for the Scottish Government to consider.
- Other comments and suggestions included:
 - A query about how this Forum will differ from the UK Committee for Climate Change.
 - An idea that the Forum should produce an annual report to monitor progress, linked to this, another called for the Forum to adopt a clear timetable for reporting and advising.
 - A proposal that the Forum's work be split into objective vs. outcome areas.
 - The need for the Forum to input into other strategies and policies across Scotland.

Suggested issues for the National Forum to focus on

3.24 Almost a fifth of the comments included suggestions about issues for the National Forum to focus on. These varied; three participants suggested that the National Forum should also include mitigation approaches. Other proposals were also put forward, including:

- For the Forum to ensure Scotland's actions reflect consideration of the global context, to examine resilience in relation to adaptation and develop a community strategy.
- To take a leadership role in collaborating across sectors and explore the interconnected nature of adaptation in sectors.
- To focus on strategies that can be implemented as soon as possible, to mitigate any urgent effects.
- A focus on removing practical barriers to effective implementation of transformative action on adaptation.
- To improve climate literacy at a local and national level.

Uncertainty about the National Forum

3.25 As noted at 3.15 above, three of the 68 respondents who provided a yes/no/unsure response to question 2 selected 'unsure'. Two of these participants shared comments with their response; both suggested that they partially agreed with the proposed National Forum but wished to highlight some reservations. One suggested that the Forum would need power to create action; because '*discussion on adaptation on its own is not enough*'; the other said '*we do not disagree...*' but felt that adaptation should be '*core business*', expressing concern that establishing a Forum might create a silo which could prevent change.

Other comments

- 3.26** Other views and suggestions shared by consultation participants about the establishment of a National Forum included:
- Eight participants expressed an interest in joining the National Forum.
 - Two consultation participants expressed concern about the potential implication of creating a National Forum for Scotland; one highlighted the cost to the taxpayer, another intimated that such a Forum should operate at a UK level.
 - One noted a query as to whether or not the National Forum on Adaptation would link to existing arrangements for flooding and regional resilience planning.
 - A call for clarity about the relationship of the forum with its 'governance body'.
 - One participant suggested that while they welcomed the idea of a National Forum, the same level of knowledge sharing could be accessed via an already existing platform, citing the Knowledge Hub and Scotland's Flood Risk management conference as examples.
 - One respondent iterated the importance of the use of consistent language and offering coherent strategies to adopt within the Forum.

A sample of illustrative quotes that typify the themes identified in responses to Question 2

“

The Forum must include members of sectors who can contribute the most - not just the already converted. There also needs to be a means of delivering action at a local and regional level - not just high level strategy. [Angus Council]

“

A National Forum would be a valuable forum opening up issues of adaptation to deliberative democracy and enabling public participation [Individual].

“

We agree that the National Forum is a valuable approach, and it should be used to spur cross-departmental working at Government level which can enable and even require cross-sectoral working at lower levels of the public sector and in the private and third sectors. [Creative Carbon Scotland]

Question 3: Do you agree that climate change adaptation behaviours should be included in the Programme?

3.27 The new climate change adaptation behaviours introduced in the consultation document are highlighted below.

‘Adapting to the impacts of climate change needs action at all levels of society. That is why we are introducing the concept of climate change adaptation behaviours for the first time. This is where individuals and organisations change their behaviour to help increase their resilience to, and reduce the severity of, negative consequences of climate change. Adaptation behaviour also includes taking advantage of new opportunities or developing new products and services to respond to changing climate. Adaptation behaviours range in scale and scope: from investing in flood protection for home and business, to changing ploughing practices on farms to reduce soil erosion’.

A quantitative overview of responses

3.28 There were seventy responses to Question 3. Of these, sixty-three respondents answered ‘yes’ indicating that they agreed with the proposal to include adaptation behaviours within the Programme; seven selected ‘unsure’. None of the consultation participants answered ‘no’ to convey disagreement. This conveys strong support for the proposal put forward by the Scottish Government.

3.29 Over three quarters (58 out of 73 consultation participants) provided an explanatory comment in addition to their yes/unsure answer. Their comments provide a more nuanced picture of responses to the proposal in relation to behavioural change, with many expressing some form of caveat about their overall expression of support. These include concerns about the focus on individuals, calls for more evidence, greater detail about the proposals and allocation of resources, roles, and responsibilities. Themes in these responses are summarised below.

Reflections on the need for behavioural change

3.30 Many participants reflected on the scale and scope of change required. Several called for the Programme to include a greater focus on change within systems and organisations rather than by individuals. Within these comments there were suggestions about ways in which the Scottish Government can contribute to or support behaviour change. (26 respondents).

3.31 Themes in these comments included suggestions that climate change adaptation behaviours need to be reinforced through legislation (10 participants) or other forms of Government action, for example, specific policies that focus on environmental practices or tackling cultural and socio-economic barriers to change (3 participants) or land use and reform (2 participants).

3.32 Five respondents highlighted the importance of developing an evidence base to establish the cost-effectiveness of climate change adaptation behaviours in the longer term. Two respondents reflected on the need to consider accessibility when disseminating adaptation behaviours; two identified increased societal awareness of climate change and urged the Scottish Government to continue to reinforce this message within the Programme through a campaign to improve climate literacy.

3.33 Other reflections on supporting climate change adaptation behaviours included:

- A call for a greater focus by the Scottish Government on networking and communication to understand community priorities.

- Clarity about actions, timescales and allocation of responsibilities for delivering action to create behaviour change.
- Concern that the current resource will not be enough to achieve the scale of behaviour change necessary and that an approach that addresses the complex social systems is needed.
- Another suggested the Programme should apply the Scottish Government's ISM toolkit⁴ to ensure effective behaviours are embedded.
- Suggestions that the Programme should have scope for flexibility be updated; examples include references to the research report into behavioural change, undertaken by AECOM on behalf of the Committee on Climate Change⁵
- Greater consideration of the range of barriers to behavioural change.

Calls for more detail or changes to the proposed adaptation behaviours

3.34 Almost half of the comments on question three included calls for more detail about, or changes to, the proposed adaptation behaviours. Of these:

- Five participants requested clarity in terms of how adaptation behaviour change will work in practice in particular sectors, how behaviour change will be monitored, who will take responsibility for encouraging behaviour change, and communication about these changes.
- Three felt the examples included in the Programme in relation to adaptation behaviours could be stronger; suggesting more comprehensive resources and information to engage groups in adaptation behaviours. One of these called for case studies of people and organisations to demonstrate the implementation of desired behaviours.
- Three respondents suggested additional adaptation behaviours to include in the Programme. These broad-ranging suggestions relate to (1) communities (2) vulnerable people (3) economy (4) land management (5) natural environment and (6) coastal and marine environment.
- Three respondents called for a shift in the focus from adaptation behaviours by individuals to more consideration of collective responsibility. Linked to this, two respondents suggested there needs to be greater significant and systematic intervention. For example, one noted that behaviour change around plastic consumption will have no effect without pressuring retailers and manufacturers to reduce their uses of plastic packaging.
- Two respondents highlighted land management as a specific area requiring greater focus in the discussion.
- One participant provided a detailed response highlighting three key calls for change. These were: (1) for the Programme to include an evidence-based framework for behaviour change; (2) to incorporate language and action which reflects the urgency and scale of change required from individuals; and, (3) provide more clarity about the scope of change required including consideration of whether or not these will be achieved on a voluntary basis, or require legislative changes.
- One called for the inclusion of arts and culture to be more strongly referenced as a means to achieve and encourage adaptation behaviours.
- One noted the word 'behaviour' is contentious in relation to mitigation in that it is vague and does not make clear the benefits of adaptation behaviours.

⁴ <https://www.gov.scot/publications/influencing-behaviours-moving-beyond-individual-user-guide-ism-tool/>

⁵ <https://www.theccc.org.uk/publications/third-uk-climate-change-risk-assessment/>

The value of including climate change adaptation behaviours in the Programme

- 3.35** Roughly one-third of comments focused on the potential impacts of including adaptations behaviours in the Programme for the first time. Participants often highlighted it as an essential step to engage individuals in a considerable, concerted effort, and many reflected on the power of behavioural change to prevent or mitigate climate change.
- 3.36** Prominent in these comments was a discussion of the importance of empowering and enabling groups, communities, and individuals to change behaviours to increase their resilience to the effects of climate change. (12 respondents). Respondents identified benefits, such as preparing and supporting people to embrace and adopt new behaviours and increase awareness of opportunities that adaptation brings. A few participants suggested that the inclusion of behaviour change on the broader policy debate would help to promote an understanding of the need for a coordinated approach to adaptation. Two stressed their view that a coordinated effort is needed to improve climate literacy.

Uncertainty about the proposed behavioural changes

- 3.37** As noted at 3.28 above, seven of the sixty-three respondents who provided a yes/no/unsure response to question 3 selected 'unsure'. Six of these participants shared comments with their response. These conveyed agreement with the overall notion of the need for behavioural change but expressed specific reservations about the proposals put forward in the draft Programme.
- 3.38** These reservations correspond with the themes described above; namely (1) calls for more specificity within the draft Programme about actions, timescales, responsibilities and monitoring in relation to changed behaviours (2) greater evidence on the mitigating impact of changed behaviours by individuals (3) calls for stronger legislative intervention by the Government, particularly in relation to economic incentives; and (4) research into ways to achieve and support behavioural change.

A sample of illustrative quotes that typify the themes identified in responses to Question 3

“ *It is laudable to forge new ground in this area of climate change adaptation behaviours, as less attention to date has been paid to such an approach compared to mitigation behaviours. At the same time, focus on individual and organisational behaviour change, outwith government, must also be fully supported by a Scottish Government commitment in the form of solid training and funding opportunities for these individuals and organisations to address climate change adaptation. [Department for Social Responsibility and Sustainability (SRS), University of Edinburgh]*

“ *More work will be needed to quantify the effectiveness of potential different adaptation behaviours and the extent to which they offer value for money at all levels (producer and consumer) compared to other interventions [Strathclyde Partnership for Transport]*

“ *Empowering individuals and organisations to change their behaviour to help increase their resilience to, and reduce the severity of, negative consequences of climate change, is important in terms of both increasing awareness and resilience. This aligns well with a growing societal awareness of climate risk and statement in the recent CCC Report that the proportion of adults in Scotland who view climate change as an immediate and urgent problem has increased by one third between 2013 and 2017, from 46% to 61%. [The Metropolitan Glasgow Strategic Drainage Partnership (MGSDP)]*

Question 4: Do you agree that an integrated approach should be taken to monitoring and evaluation?

3.39 The new integrated approach to monitoring and evaluation, as described in the consultation document, is set out below.

'The monitoring and evaluation framework for the second Adaptation Programme has been developed in response to specific recommendations from both the Adaptation Subcommittee (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. Our new approach acknowledges that M&E is integral to an outcomes-focused Programme and encourages consideration of M&E at all stages of adaptation policy development'.

A quantitative overview of responses

3.40 There were sixty-nine responses to Question 4. Of these, sixty-five respondents answered 'yes' indicating that they agreed the approach should be included within the Programme; four selected 'unsure'. None of the consultation participants answered 'no' to convey disagreement with the proposal to take an integrated approach to monitoring and evaluation. This suggests strong support for the proposition put forward by the Scottish Government.

3.41 Over half (47 out of 73 consultation participants) provided an explanatory comment in addition to their yes/unsure answer. Their comments provide greater insight into participants' views; two thirds (31 out of 47) highlighted issues for further consideration by the Scottish Government; the remainder fully endorsed the proposals and had no changes to suggest. Themes in these responses included reflections on the importance of monitoring and evaluation, calls for more detail and suggested refinements or models to explore. The responses are summarised below.

The value of an integrated approach to monitoring and evaluation

3.42 Almost half of the respondents that provided a comment for question four (23 out of 47 respondents) expressed support for the integrated approach to monitoring and evaluation. It was frequently described as key to establishing and measuring the effectiveness of adaptation policies. Two participants endorsed the proposal to utilise existing frameworks, one participant reflected on the value of this approach in allowing for adjustments to policy and increasing data availability; another noted that this approach would encourage openness and transparency.

Suggested monitoring and evaluation models

- 3.43 The second most prevalent theme in responses concerned models to consider. Suggestions within these comments varied, ranging from ways to structure monitoring arrangements, to current activity that can be learned from or incorporated, and specific measurements for consideration:
- Concerning models:
 - Three participants suggested that an independent body should provide the oversight; one noted Environment, Climate Change, and Land Reform Committee of the Scottish Parliament could fulfil this role.
 - Three respondents urged the Scottish Government to build upon relevant approaches already underway. They shared detailed examples of work in the private, public and third sectors to measure and monitor developments. These have been signposted to the SG for consideration.

- Two respondents advocated for the inclusion of indicators for regional and local areas to enable adaptation monitoring at a range of levels.
 - One respondent called for the involvement of research bodies and universities in achieving an integrated approach; another suggested that they themselves should be involved in the development of a Framework.
 - One respondent suggested a standard template or methodology be developed to aid organisations to monitor and evaluate appropriately; another highlighted the importance of coordinating timescales in an integrated approach.
 - One respondent suggested that reporting should be coupled with climate change duties within public bodies.
- Concerning specific activities to monitor and evaluate:
 - Two respondents called for mechanisms to monitor those who financially may struggle to adapt to climate change in terms of weather incidents. They also propose a specific focus on monitoring the resilience of vulnerable communities to climate change risk.
 - Two respondents suggested particular areas for exploration; for example, local sustainable drainage systems (SuDS), issues of climate justice, the use of ‘SMART’ targets.
 - One respondent discussed the potential difficulty of monitoring health outcomes and relating them to adaptation policy. They also suggested that the progress indicators used in the new Forestry Strategy could be useful in monitoring adaptation.

3.44 Other general considerations highlighted by participants included reflections on the need to communicate evidence gathered through monitoring and evaluation activity and a view that sectors should currently be integrating evaluation and monitoring into their planning.

Calls for more detail

3.45 Roughly a quarter of the comments about this question included calls for clarity or further detail about what is proposed (12 respondents). For example, seven respondents requested detail on what the integrated approach entails, timescales and methodology to allow; one noted the need for stakeholders to have time to plan and consider the resource impacts. Five respondents commented on the need for alignment and consistency.

3.46 Linked to this point, seven respondents asked for clarity about the Scottish Government’s role in monitoring and evaluation. For example, two called for the Scottish Government to work with sectors to gain a better understanding of the areas that need monitoring; two called for more investment in improving monitoring data; another two queried whether the SG will be providing extra funding or support to enable sufficient monitoring. One called for clarity between the proposals and the updated National Performance Framework.

Uncertainty about the proposed integrated approach to monitoring and evaluation

3.47 As noted at 3.40 above, four of the respondents who provided a yes/no/unsure response to question 4 selected ‘unsure’. Three of these participants shared comments with their response. One said they did not feel there was sufficient information to comment; the others acknowledged the rationale for the approach but linked their reservation to the perception of an integrated approach being overly complicated.

**A sample of illustrative quotes that typify the themes identified in responses to
Question 4**

“

Monitoring and evaluation are vital to track success or identify where improvement is needed within the adaptation programme. Integrating this will give an overview of Scotland's efforts to adapt to climate change as a whole. [SWestrans]

“

Monitoring and evaluation is vital to effectively assess progress on adaptation. An integrated approach is key to allow for adjustments to policy and it also has the potential to increase data availability and the effectiveness of certain adaptations to certain projects/regions/areas. [Anonymous]

“

The framework presented appears to be a reasonable approach but it is difficult to judge how effective this might be without further detail. The existing adaptation indicators have limited application: it would be helpful if indicators were developed that could be used at a regional or more local level to help track adaptation activity at the local authority level. [Stirling Council]

“

Our interpretation of an integrated approach to monitoring and evaluation is that it will include representation from all sectors involved in delivering the strategy and will draw evidence/learning from a range of sources, networks, policies and actions. One way to ensure this is to invite the groups, communities or organisations that are represented in the policies for each outcome. This will help to support community empowerment and ensure collective responsibility for the strategy. [Glasgow Centre for Population Health]

4. Responses to the Proposed Vision and Outcomes

Introduction

4.1 This chapter sets out responses to consultation questions five and six, which cover the proposed vision and outcomes for the draft Programme.

Chapter overview:

- The majority view was of agreement with the draft vision and draft outcomes.

Question 5: Do you agree with our long-term vision for adapting to climate change in Scotland?

4.2 The vision set out in the consultation document is provided below.

Programme Vision

'Our overarching vision is that we live in a Scotland where our built and natural places, supporting infrastructure, economy and society are climate ready, adaptable and resilient to climate change'.

A quantitative overview of responses

- 4.3 There were sixty-eight responses to Question 5. Of these, fifty-three respondents answered 'yes' indicating that they agreed with the draft vision; ten selected 'unsure' and five answered 'no'.
- 4.4 Nearly three quarters (47 out of 73 consultation participants) provided an explanatory comment in addition to their yes/unsure/no answer. Their comments provide greater insight into participants' views; two thirds (31 out of 47) agreed with the vision overall, but highlighted matter for further consideration by the Scottish Government; eleven fully endorsed the vision and had no changes to suggest. The five participants who disagreed with the vision explained their rationale, and two participants provided general comments that did not indicate a clear view about the proposal. Themes in these responses are outlined below:

Articulation and achievement of the vision

- 4.5 There were several comments on the wording or positioning of the vision, which varied depending on the participant. For example, eleven participants suggested the vision should act as a call to arms, adopting urgent and robust language to convey the speed and scale of change required. One participant praised the elements of flexibility they identified within the vision; another alluded to the challenge of developing a vision that is understood across the range of sectors the Scottish Government wishes to engage.
- 4.6 Roughly half of the comments on articulation or language included reference of specific words to add to the vision or elements to change:
- One asked the Scottish Government to explain the terms 'adaptive and resilient'; another two respondents suggested these terms were overused and called for a streamlining of the language.
 - There were calls from individual participants to reference specific issues within the vision, including: (i) culture and (ii) reducing emissions (iii) the importance of

educating young people about climate change (iv) consideration of extreme scenarios (v) freshwater resources (vi) social justice and (vii) greater reference to the circular economy.

- One participant suggested that infographics and visuals would strengthen the presentation of the vision.
- Another highlighted the recent efforts made in Scotland to become a leader in renewable energy production and felt these could be more strongly conveyed in the vision.

4.7 Six respondents reflected on ways for the Scottish Government to support the achievement of the vision. Three of these highlighted the need for a whole-government approach to embedding adaptation.

4.8 There were also several references to timescales; five participants expressed concern that the vision does not specify when the outcomes should be achieved. Another called for the Scottish Government to establish a long-term vision which considers the Programme a five-year step; a few respondents requested that progress toward the vision be reviewed after five years. Linked to this point, one respondent suggested the programme should be flexible and developed over time to allow responses to any new risks or threats. Another called for the Programme to provide a plan for the impacts of large-scale global events that are influenced by climate change.

Examples of facilitators, barriers and opportunities linked to vision enactment

4.9 Five respondents shared examples of the vision enactment; or conversely, barriers to achieving the vision. These included:

- Adopting ecosystem-based approaches.
- Learning from countries where climates are changing quickly, such as Canada.
- Implementing decarbonising strategies.
- Challenges experienced by small business owners.
- The role of the forestry sector in achieving the vision.

4.10 A small number of respondents highlighted opportunities linked to the Programme. For example, one suggested the scope to go further in using adaptation to address existing inequalities in society; another noted that farmers are currently at risk from soil erosion but changing temperatures, rainfall, and seasonality which could present opportunities for diversification of crops and livestock.

Uncertainty about or disagreement with the proposed vision

4.11 As noted at 4.3 above, ten of the respondents who provided a yes/no/unsure response to question 5 selected 'unsure'. All of these participants shared a comment with their response. Their uncertainty about endorsing the vision was attributed to a range of reasons, as follows:

- Lack of reference to social justice within the vision.
- A wish for the vision to convey a greater sense of urgency.
- A desire for more education about climate change.
- Calls for more ambition, including systemic change and specific statements of commitment.
- Concerns about the appropriateness of a 'one-size fits all' approach.
- Lack of reference to reducing emissions within the vision.
- A need for greater clarity about the long-term vision and timescales for achieving change.

- A desire for more information about how the vision will be implemented.

4.12 The five participants who disagreed with the vision expressed strong views in their comments. These aligned with the themes described above and typically centred on calls for the vision to convey a greater sense of urgency and ambition.

A sample of illustrative quotes that typify the themes identified in responses to Question 5

“

The vision is broadly framed well, but we would also ask Scottish Government to consider the potential for refining the adaptation as a springboard for a more prosperous, equitable, country, where adaptation supports delivery a range of wider Scottish Government outcomes. [Climate Ready Clyde]

“

We appreciate the vision that you have given but we feel there is a gap in educating people about climate change, especially our generation. We don't currently think that this subject is as much a priority as it should be in our curriculum. [Sunnyside Polar Explorers, Sunnyside Ocean Defenders - Sunnyside Primary School]

“

It is appropriately ambitious but simple. [Transport Scotland]

“

We agree with this long-term vision, and advocate the urgent promotion of specific policies which will achieve it. The promotion of locally-managed initiatives should be encouraged since these may be more responsive to changing circumstances over short timescales, and can be integrated with the promotion of behaviour change at personal and community levels. [Anonymous]

Question 6: Does the Programme identify the right outcomes for Scotland over the next five years?

4.13 The outcomes described in the consultation document are provided below.

Programme Outcomes

'We have developed a set of seven high level "outcomes" for the Programme, derived from the UN Sustainable Development Goals and the Scottish Government's National Performance Framework. A framework for each high-level outcome which includes sub-outcomes, policies and proposals, performance indicators and climate change risks is being developed'.

The seven outcomes:

- *Our communities are inclusive, empowered, resilient and safe in response to the changing climate*
- *The people in Scotland who are most vulnerable to climate change are able to adapt and climate justice is embedded in climate change adaptation policy*
- *Our inclusive and sustainable economy is flexible, adaptable and responsive to the changing climate*
- *Our society's supporting systems are resilient to climate change*
- *Our natural environment is valued, enjoyed, protected and enhanced and has increased resilience to climate change*
- *Our coastal and marine environment is valued, enjoyed, protected and enhanced and has increased resilience to climate change*
- *Our international networks are adaptable to climate change*

A quantitative overview of responses

4.14 There were sixty-five responses to Question 6. Of these, thirty-seven respondents answered 'yes' indicating that they agreed with the draft outcomes; twenty-one selected 'unsure' and seven answered 'no'.

4.15 Roughly three quarters (57 out of 73 consultation participants) provided an explanatory comment in addition to their yes/unsure/no answer. The comments offer greater insight into participants' views; almost all (50 out of 57) indicated they agreed with the outcomes on a general level, but highlighted matters for further consideration by the Scottish Government; five fully endorsed the outcomes as set out in the consultation document and had no changes to suggest. All of the seven participants who disagreed with the outcomes explained their rationale. Themes in these responses are outlined below.

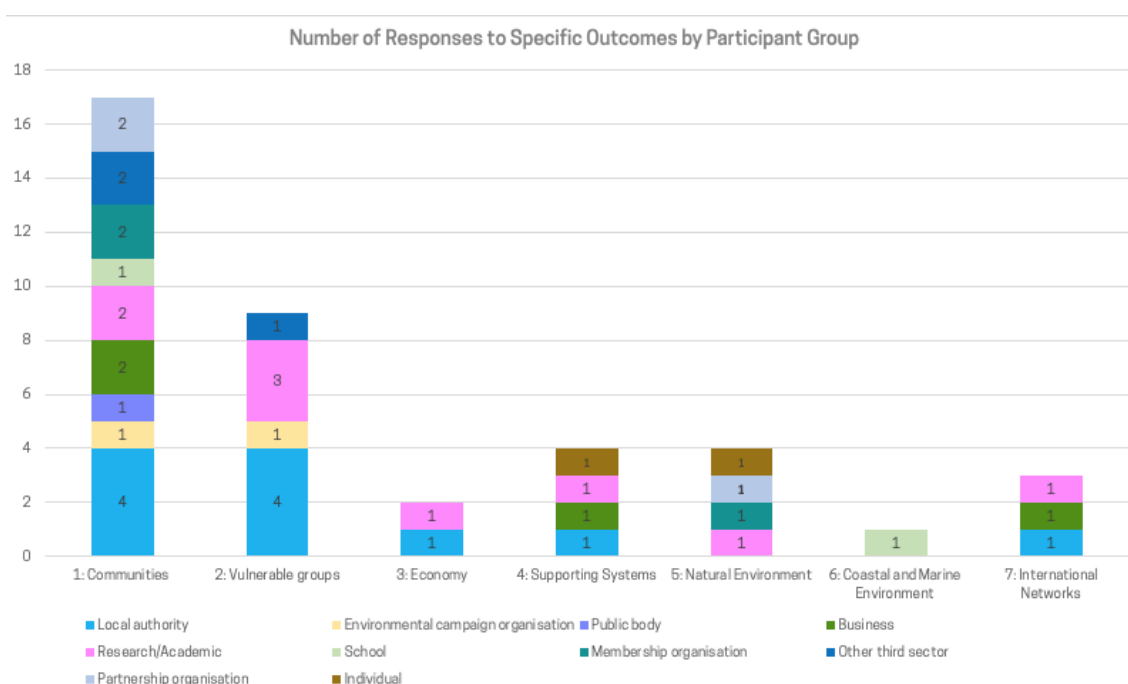
General comments on the outcomes

4.16 Over half (37 out of 57) comments included reference to further areas participants would like to see included in the outcomes section of the draft Programme document. These varied, according to the respondent.

- 4.17 Just over a third of the participants who provided comment on question 6 (20 respondents) reflected broadly across the outcomes. Roughly half referred to the high-level nature of the outcomes, with many asking for specific detail, for example about actions, targets or performance indicators. A few described broader issues which may affect the achievement of outcomes such as trade relations and the speed of climate change.
- 4.18 Some participants intimated that the outcomes are unachievable or unmeasurable and called for clarity about where the responsibility for monitoring lies. Seven identified a need for more explicit linkages between outcomes and sub-outcomes; and externally to other policies, risks and adaptations, indirect impacts, and sources of climate change. Another suggested they would like to see more reference to cultural heritage.
- 4.19 Eleven respondents reflected on the presentation or wording of the outcomes. Three identified an overlap and linkages between the outcomes, suggesting a hierarchy between them, for example that outcomes one, two and seven underpin the others. One suggested the document include a 'key' to areas covered under each outcome so that the strategic linkages are more clearly understandable. Another suggested rationalising and simplifying the strategic/outcomes 'wheel'. There were also comments about the use of specific words or phrases.
- 4.20 Ten respondents called for greater urgency or ambition in their comments, with two calling on the Scottish Government for more communication about climate change with the public and including this topic as a mandatory part of education curricula. More action on transport modes and infrastructure and on prevention were also highlighted.
- 4.21 Five respondents said they would like to see more detail/clarity on what is meant by climate justice or how behaviour change/engagement will be achieved. Three mentioned they would like more detail on supply chains/food, indirect impacts, mental/psychological health impacts, main sources of climate change, mitigation (specifically afforestation), how any actions will be resourced, review and ongoing responsiveness to emerging research. There were also repeated calls for greater emphasis on infrastructure or built (including historic) environment.

Comments on specific outcomes

4.22 The graph below shows the number of comments on specific outcomes, by participant group.



4.23 Themes in the comments on outcomes are described below:

Outcome 1

4.24 Outcome 1 states ‘communities are inclusive, empowered, resilient and safe in response to the changing climate’. The comments on this outcome focussed mainly on issues for greater prominence in the draft Programme. These included reference to:

- The built environment (8 comments).
- Education/informing/engaging communities/behaviour change (3 comments).
- Equalities/climate justice (3 comments).
- Mental health/psychological impacts.
- Travel modes.
- Need to include places as well as communities.
- Food growing.

Outcome 2

4.25 Outcome 2 states ‘The people in Scotland who are most vulnerable to climate change are able to adapt and climate justice is embedded in climate change adaptation policy.’ There were many comments on the concept of climate justice. For example, one asked for more clarity on what this means and how it might be embedded in policy, and for explicit reference to the direct and indirect impacts of climate change on both physical and mental health in sub-outcomes 2.2 and 2.3. A few suggested inequality should be the central focus of the climate adaptation agenda. Conversely, one respondent commented that the reference to embedding climate justice in climate change adaptation policy felt at odds with the scale of the other outcomes and suggested it may be more appropriately incorporated in a sub outcome or as a policy response.

4.26 Some of the comments included a combined mention of outcomes 1 and 2. Links between these outcomes were identified with some calling for greater separation between the issues of community capacity building and the built environment. Other themes in comments on outcome two include:

- Three remarks about sub-outcome 2.2: one felt the discussion about active travel should extend beyond leisure. There was a suggestion that the broader public health community can contribute by supporting people directly, shaping policy and practice, adding to the evidence base and protecting people from the impacts of climate change.
- Two respondents commented that this outcome placed the burden of responsibility on those most at risk/vulnerable, calling for a focus on supporting and empowering people, rather than increasing their ability to adapt. Another added that it is crucial to recognise that the responsibility for adaptation lies with everyone and not just those at risk.
- Comments on sub-outcome 2.3 included a call for the potential of green infrastructure to improve air quality to be included.
- Other comments about the built environment included a call for greater consideration of those living in older buildings and conservation areas and for the inclusion of the word ‘landscapes’ within the outcome.
- One participant suggested the policies listed to do not cover all the risks identified under this outcome. Another, while supporting the climate justice focus, felt it should be linked to sub outcome 1.1.

Outcome 3

4.27 Outcome 3 states ‘our inclusive and sustainable economy is flexible, adaptable and responsive to the changing climate’. Comments about this outcome centred on the potential for economic opportunities associated with climate change to contribute to a more inclusive and fairer society. There was mention that this could support the Scottish Government’s Economic Strategy, which promotes increasing competitiveness while simultaneously tackling inequality. Another called for greater mention of the importance of resilient buildings and places (sub-outcome 1.2) in this and outcomes 3 and 4.

Outcome 4

4.28 Outcome 4 states ‘our society’s supporting systems are resilient to climate change’. One participant suggested elements of this and outcome 1 (which include buildings and places) could be considered together. Another identified an opportunity to make the connection between mitigation and adaptation under this outcome.

Outcome 5

4.29 Outcome 5 states ‘our natural environment is valued, enjoyed, protected and enhanced and has increased resilience to climate change’. One participant suggested the separation of the natural environment from other outcomes was problematic, arguing for the integration of other outcomes into natural environment. Another described the relevance of land reform and the importance of policies that favour diverse, flexible and experimental land. More considerable mention of active travel within this outcome was called for by another participant.

Outcome 6

4.30 Outcome 6 states ‘our coastal and marine environment is valued, enjoyed, protected and enhanced and has increased resilience to climate change’. One respondent called for climate change and marine litter lessons as a compulsory part of the national curriculum linked to Health and Well Being; not considered part of geography or science.

Outcome 7

4.31 Outcome 7 states ‘our international networks are adaptable to climate change’. Four respondents made specific comments on outcome 7, three commenting that the definition/scope of ‘international networks’ could be improved/expanded/clarified as it could mean none, some or all of food, travel and trade relations and the word ‘networks’ is ambiguous. They felt it could be strengthened by referencing Scotland’s role in advocating for and championing adaptation action and more explicitly addressing climate impacts and responsibilities (including climate justice). One added that, in keeping with commitments to social/climate justice, there should be a specific reference to climate refugees.

A sample of illustrative quotes that typify the themes identified in responses to Question 6



We welcome the high-level outcomes set out by the Programme and their alignment with Sustainable Development Goals and National Performance Framework. This allows for links to be made to wider policy priorities and to see clearly how it fits in and contributes to wider Scottish Government priorities. We view this as a very positive move towards ensuring that

adaptation, and more broadly climate change and sustainability, do not operate within a policy vacuum. In addition to this, we welcome the central focus of people and communities and collaborative action. [Keep Scotland Beautiful]

“ *The outcomes are very broad and we would prefer to see them be more cross-cutting and linked together. At the moment, the natural environment is one of the seven outcomes, however, it underpins many of the other outcomes. [Chartered Institute of Ecology and Environmental Management]*

“ *Broadly, the programme seems appropriate. However, without explicit focus on indirect impacts some of the outcomes will be difficult to achieve. The expected impacts could be redefined include indirect impacts, and the addition of an associated outcome that will target them explicitly. [The James Hutton Institute]*

5. Additional policies to include within the Adaptation Programme

Question 7: Are there any additional policies that should be included in the outcomes set out in the following pages?

5.1 There were 66 responses to Question 7. Of those 66 responses: 50 respondents answered 'yes' indicating that they thought additional policies should be included in the outcomes, six answered 'no' and ten were unsure. Fifty-nine respondents made additional detailed comments, including two who did not answer the 'yes/no/unsure' question. The summary of these detailed comments below is organised by the frequency with which views were identified from most to least prevalent.

Overall nature of responses

5.2 Of the 59 substantive comments, 45 made at least one specific suggested change or addition, 18 making suggestions specific to at least one particular outcome. The remainder (and many of those suggesting specific policies) made general comments including:

- Calls to improve linkages between policy areas and adaptation.
- Comments on broad policy areas such as planning, farming, food insecurity, waste management, soil health, oil and gas subsidies, culture, air traffic, deer management, freshwater catchment management, planning, fair trade, peatland management, air quality policies and legislation and Low Emission Zones.
- For inclusion of climate change in the national curriculum.
- Taking account of equality issues rather than merely physical impacts when identifying people 'vulnerable to climate change'.
- An increased focus on cycling and active travel.
- Consideration of the specific implications for island communities.
- For a greater emphasis on culture and tourism.
- One suggested that a number of the policies named relate to work during the first Scottish Climate Change Adaptation Programme (SCCAP 1). They felt these, therefore, would not be fit for purpose for the named visions and goals. This respondent suggested that it may be better to simplify this section given the significant difference between SCCAP1 and SCCAP2.
- A small number suggested some of the policies cover climate change mitigation rather than adaptation e.g., Cleaner Air for Scotland Strategy.

5.3 Three respondents noted that many of the policies listed are already in place and that the document is drawing together other policy areas/instruments/drivers rather than influencing or directing change across government policy. For example, one describing it as a '*brochure of work already being undertaken with very little in the way of new proposals.*' The point was made again that adaptation behaviours are predominantly focussed on individuals rather than organisations or sectors.

Key themes

Additional policies to include

5.4 Two thirds of the substantive responses (comments from 42 out of 59 participants) mentioned at least one additional specific policy, policy suggestion or programme/initiative to include or reference. Some of these included calls for new policy creation; others for reference to existing policies that participants felt to be of relevance, within the discussion. There were 17 specific

mentions of outcome 1, 15 of outcome 2, 14 of outcome 3, 9 of outcome 4, 11 of outcome 5, 4 of outcome 6 and 4 of outcome 7. The additions suggested are grouped under headings below (note many were mentioned in relation to more than one outcome):

Planning/infrastructure:

- Access Strategies / Greenspace / Core Path Plans.
- City Region Deals.
- Core Paths Strategy.
- Community Planning.
- Designing Places.
- Designing Streets.
- Design Manual for Roads and Bridges.
- Development plans.
- Extending the Place Standard and the Place Principle.
- Green Infrastructure Strategic Intervention.
- Infrastructure Investment Plan.
- Infrastructure Commission for Scotland.
- National Park Plans.
- National Planning Framework.
- National Planning Framework 3.
- National policy to mandate the use of green roofs, particularly for larger buildings in urban settings within flood risk Potentially Vulnerable Areas.
- Open Space Strategy.
- Reference to the Central Scotland Green Network (as a National Development in the National Planning Framework).
- Regional Economic Partnerships.
- Scottish Planning Policy.
- Scottish Government Infrastructure Investment Plan.
- Strategic planning through emerging regional strategies.

Communities/sustainability/resilience:

- Active Travel Strategies & Long-term Vision for Active Travel in Scotland.
- Additional place tools, such as those developed by the Scottish Wildlife Trust (SWT) or the Natural Capital Standard (NCS).
- Learning for Sustainability 2030+ vision and outcomes.
- Carbon Literacy for Communities.
- Climate Ready Classrooms programme.
- Climate Challenge Fund.
- Climate Justice Fund.
- Community Empowerment Act and associated policy.
- Education for Sustainable Development.
- Health and social care and the impacts of temperature, extreme weather.
- Health and Social Care Strategic Plan and Locality Plans concerning developing and strengthening communities.
- Inequalities Action Frameworks.
- National Walking Strategy.
- Physical Activity Plans / Strategies.
- Place Standard Tool, The Place Principle and the Local Flood Risk Management Plan.
- Regional resilience plans.
- Resilient Communities Strategic Framework and Delivery Plan 2017-2021.

Water/coast/marine:

- Blue Carbon Forum.
- Climate Change Plan.
- Flood Risk Management Act and policies on Natural Flood Management.
- National Coastal Change Assessment super sites.
- National Flood Risk Assessment & Rivertrack.
- Policies which encourage businesses to reduce flood risk by increasing green space (de-paving) and retrofitting surface water measures, with appropriate incentives to do so.
- Regional Marine Planning.
- Reform drainage charges.
- River Basin Management Planning.
- Scottish Government-sponsored work to review drainage policy and guidance, and the Flood Risk Management Act (FRMA).
- Scottish Water's Water Resource Plan.
- SEPA's Sector Plan.

Energy:

- Fuel Poverty Strategy.
- National Energy Strategy.
- RIIO-GD2 and RIIO-ED2 – led by Ofgem.

Land use and biosecurity/diversity:

- Agriculture Bill (post-Brexit) or implementation of CAP reform.
- Biosecurity policies.
- Land Use Strategy.
- Historic Environment Scotland's Conservation Area Regeneration Scheme (CARS).
- Invasive Non-Native Species (INNS) policies related to forestry.
- Local Biodiversity Action Plans.
- Muirburn Code.
- National Ecological Network, as set out by Scotland's Biodiversity 2020 Route Map.
- Plant health policies.
- Policy for internationally designated sites for biodiversity.
- Policy for Invasive Non-Native Species.
- Route Map Big Step 3 Quality Greenspace.
- Route Map Big Step 2 Investment in Natural Capital.
- Scottish Forestry Strategy.
- Scottish Biodiversity Information Forum Review outcomes.
- UK Minerals Strategy.

Economic:

- Scottish Government Strategy on a Circular Economy.
- Scottish Economic Strategy with consideration of adaptation being embedded within it
- Leverage funding and financing mechanisms, such as Scottish National Investment Bank, the review of the Climate Challenge Fund, the UK Government's response to the Green Finance Taskforce, the UK Municipal Bonds agency and any UK government replacement to financing currently provided by the European Investment Bank.

Other:

- Adaptation Scotland programme.
- The British Standards Institute and International Standards Organisation (ISO) are developing a range of international and UK standards (ISO14090, ISO14091, and ISO14092 and a UK standard on adaptation pathways).
- City Region Deals.
- Civil Contingencies policies – Resilience Partnerships/Integrated Emergency Management.
- Climate Week.
- Emergency protocols that involve invoking a state of emergency and nation-wide mobilisation of emergency and military personnel which could arise under a number of eventualities. For example, social unrest due to food or fuel price spikes, a sudden influx of numerous climate refugees, food and water distribution and breakdown of supplies.
- The British Standards Institute and International Standards Organisation (ISO) are developing a range of international and UK standards (ISO14090, ISO14091, and ISO14092 and a UK standard on adaptation pathways).
- Hyogo and Sendai Framework for Disaster Risk Reduction.
- Housing Beyond 2021.
- Mainstreaming the approaches of UNFCCC and the Paris Agreement to climate change, UNISDR’s Sendai Framework for Disaster Risk Reduction as well as the Sustainable Development Goals (SDGs) together.
- National Waste Management Plan.
- Our Place in Time: the historic environment strategy for Scotland.
- Other standards have roles to play, such as BREEAM for the Built Environment (which includes an adaptation credit).
- Strategic Transport Projects Review (STPR2).
- Sub-National Partnerships – Partnership approaches such as Climate Ready Clyde, Edinburgh Adapts and Aberdeen Adapts are important mechanisms to accelerate adaptation at a sub-national level.
- Recommendations of the Committee on Climate Change’s Report on the Final Assessment of the First Climate Change Adaptation Programme for Scotland.

Comments on presentation/wording

5.5 Eight respondents commented on the presentation or wording of the policies discussed within the document.

- Some of these commented on the complex and cross-cutting nature of the information and the difficulty of assigning policies to specific outcomes without creating repetition or omission. One felt that policies relating to the natural environment could be better-integrated across all outcomes. One commented that while the layout is useful to keep the consultation simple, some cross-referencing or coding of policy against the outcomes that it delivers would be helpful.
- It was suggested that existing policies had been grouped under outcomes without the necessary detail to explain how the policies will together achieve specific progress related to the sub outcome⁶. An additional level of detail on existing policies was called for, spelling out how each policy will increase resilience or capacity for adaptation (the activities planned in the programme timeframe, their intended aims, responsible owners, timelines, and allocated investment for adaptation).

⁶ ‘for example, how will the Energy Efficient Scotland policy directly contribute to adaptation? –will delivery of this policy improve the energy efficiency of our housing stock whilst at the same enabling whole house solutions that take account of increased risk of overheating, damp and damage to buildings?’

- Another highlighted that although the document mentions that proposals are included alongside policies, proposals are not listed under all outcomes and it is not clear if this is because listed policies are considered sufficient for achieving particular outcomes.
- A small number felt that an acknowledgement of any gaps, for example where the policies in place will not meet required outcomes, and an outline of any additional policies required during the lifetime of the plan to complement existing and planned policies listed in the consultation document would be helpful.
- Two participants suggested this section could be simplified, asking for the removal of policies in this part of the document.
- One pointed out that some of the measures listed as policies are not policies, noting, by way of example:
 - the Scottish Flood Forum is an independent organisation, not a policy.
 - The Place Standard Tool is a tool and not a policy.
- One respondent made a few specific wording suggestions about how historic environment policy for Scotland has been described. These have been signposted to the Scottish Government for consideration:
- Another noted that ‘there is an assumption that climate change will stimulate outdoor pursuits; it should be noted that the opposite may happen in the event of extreme weather events, which may result in areas being waterlogged for extended period, for example.’

Ways the SG can support implementation

- 5.6** Six participants reflected on ways the Scottish Government could help to support adaptation. In their comments they called for:
- Greater recognition of the negative impact of subsidising the oil and gas sector.
 - Supporting disadvantaged people to engage in climate change adaptation
 - Making climate change part of the Health and Wellbeing curriculum
 - Having a policy commitment to ‘climate literacy’ for all parts of society.
 - To ban all plastics unless recycled into new road surfaces.
 - To support the rollout of Smart Village Scotland, to help with communication.
- 5.7** Participants also shared a range of specific examples and evidence to inform policy development in the future. These have been signposted to the Scottish Government for consideration.

6. Responses to the Strategic Environmental Assessment

Introduction

- 6.1 This chapter presents responses to consultation questions eight to ten, which asked respondents for their views on the Strategic Environment Assessment⁷.

The SEA

The consultation document includes an overview of the SEA. It concludes the draft Programme is likely to have significant positive environmental effects on climatic factors, by drawing together relevant adaptation measures to maximise their impact, capitalise on synergies and addressing any gaps. This approach to climate change adaptation can also optimise environmental benefits more widely, with likely positive environmental effects to biodiversity, population and human health, air, soil, water, material assets, cultural heritage and landscape. The environmental assessment has also identified the potential for mixed / uncertain effects arising from future adaptation measures at the local level. Individual projects would however be subject to consideration through the relevant regulatory regimes and appropriate mitigation applied. Finally, the Environmental Reports sets out opportunities for enhancement linked to the 7 draft programme outcomes.

Question 8: 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?

- 6.2 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 of the SEA for further consideration, and another participant described their view as 'unsure'. Themes in the comments are described below.

Agreement with scope and accuracy

- 6.3 Of the 22 who commented that they agreed with the scope and accuracy, the majority (13 respondents) indicated that the information presented was credible and comprehensive. 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.
- 6.4 Just under half (9 respondents) confirmed their agreement without elaboration; making short statements such as '*content with this*'.

Aspects of the SEA for further consideration

- 6.5 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

⁷ The full SEA document is available for review here https://consult.gov.scot/energy-and-climate-change-directorate/adaptation-programme-2019-2024/user_uploads/a23448769.pdf

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.

6.6 Respondents' suggestions of issues for greater coverage within the document varied, according to their specific area of interest or expertise, and are summarised below:

- Mention of biotechnology/GMOs.
- Statements on how the baseline is defined and greater specificity within the SEA in relation to risks.
- Consideration of impacts on migratory species and more emphasis on species only found in Scotland.
- More discussion about human health and air quality in urban environments and the need for green space.
- Expansion of the land use section, to include a landscape-scale approach which discusses ecosystem services.
- For the SEA to note that new renewable energy infrastructure might have negative effects on the historic environment, and to reflect more strongly on the interdependencies between natural and historic environment and landscapes.
- Expansion of coverage of all industry sectors, more detail on fuel supply and consideration of the supply chain for coastal and remote locations.
- Identification of flooding as the greatest climate change risk.
- A reassessment of the condition of native woods, based on the perception of there being an 'overly positive spin' on this issue within the SEA.
- A greater focus on potential mitigation measures to reduce threats to habitats and species and discussion of the impact of changes in the timing of seasonal events and migration patterns.

6.7 Three participants provided extensive comments which they noted covered their responses to questions 8 to 10. These detailed responses cover a broad range of elements within the 73-page SEA document and have been signposted to the Scottish Government for consideration. They are summarised below:

- Detailed response 1:
 - For a broader focus on working with nature and assessment within the SEA at the sub-outcome level. Other proposed changes included details of specific mitigation activities, for the Programme to indicate how behaviours could best be promoted, consideration of ways in which mitigation in relation to one outcome might harm adaptation in another, acknowledging that focusing adaptation efforts on the system most vulnerable to climate change impacts may not always create the maximum environmental benefit.
- Detailed response 2:
 - For the assessment to consider the potential for these adaptation activities to also impact on the causes of climate change
 - Qualification of the statement at 4.2.3 to explain that this is limited to the context of adaptation to climate change. Also note the statement at 4.9.6 similarly is generally limited to the context of adaptation to climate change and other SEA topics, such as health and wellbeing (in relation to housing conditions) or material assets (in relation to buildings).
 - For the post-adoption statement to clarify the scope of what was considered under the topic of climatic factors in the draft Programme assessment and future reviews of the Programme should discuss 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.

- They suggested the SEA did not explain whether alternatives within the seven adaptation outcomes were considered in the assessment and welcomed this inclusion, on the basis that preparation contributing to consideration of environmental issues should be included in the SEA reporting even if it falls outwith the SEA process.
 - For more discussion of how the mitigation measures and enhancement opportunities noted in Section 4.9 have been or will be progressed and clarification within the Post Adoption Statement in this respect.
 - Where the mitigation or enhancement proposed does not relate to any modification to the programme itself, for the Post Adoption Statement to identify: (a) the measures required, (b) when they would be necessary and (c) who will be required to implement them.
- Detailed response 3:
- For clarity as to how identified mitigation measures and opportunities have influenced the content of the draft Programme.
 - As referenced at 6.6, for inclusion within the Programme, under Outcome 6, of relevant narrative and policies relating to the historic environment. Linked to this, for the assessment of Outcome 5 to draw out more strongly the interdependencies between natural and historic elements of the environment and landscapes, and for this to have influenced the choice of policies included under this outcome; and, for the assessment to note that new renewable energy infrastructure also has the potential for negative effects on the historic environment.

Comments on presentation or wording

- 6.8** Two respondents reflected on the presentation of the SEA in their responses to question 8. One asked for a summary table to be included in the Post Adoption Statement. The other described additional policy links to incorporate within the SEA. They also mentioned some confusion arising from the inclusion of policies in the SEA which are not referenced in the consultation document.
- 6.9** One participant noted that young people found the question difficult to answer and suggested that in future child-friendly versions of consultation documents and questions should be produced.

Question 9: What are your views on the predicted environmental effects as set out in the Environmental Report?

6.10 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 of these (18 out 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 in the comments are described below.

Themes in agreement with the estimation of impact

6.11 Over half of the substantive responses included comments indicating agreement that the predicted environmental impacts set out in the Environmental report were a reasonable estimate. 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.

- 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.
- 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.

Disagreement or uncertainty concerning the predicted effects

6.12 One participant disagreed with the predicted effects on the basis of them being too general, and another participant described their view as 'unsure', explaining 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 this comment.

Question 10: 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?

6.13 There were 42 responses to Question 10. Nine of these were 'no comment' or similar, leaving 33 substantive comments for analysis. Themes in these responses are described below.

Responses to the findings

6.14 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. The majority view was of general agreement with the findings.

6.15 Eighteen participants indicated agreement with the findings. These comments frequently highlighted elements that will support the achievement of outcomes such as the regulatory controls in place and the monitoring framework; one anticipated the National Forum 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.

6.16 Nine participants made general or neutral descriptive comments.

6.17 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 specified; another suggested 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 and high expectations for behaviour change to effect impact.

6.18 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 desired for the focus to be on the natural environment as the 'organising factor'.

Comments on monitoring

6.19 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.

Reflections on mitigation:

- 6.20** Six respondents commented on mitigation:
- Three shared general or descriptive comments in overall support of the approach.
 - Three suggested more work is needed. They 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.

Communication

6.21 There were six comments on communication. These mostly emphasised a need for wide publicity of the urgency to encourage behaviour change and adaptation action. Suggestions included placing climate change on curricula, legislation and introducing incentives to bring about change. Two respondents suggested channels that could be used (Smart Village Scotland and Adaptation Scotland's website).

Additions to the SEA

6.22 Suggested additions to the SEA, as identified in participants' responses to question 10, are described below:

- Mention of the oil and gas industry and policies to promote clean and renewable energy.
- Local structures to address measures on coastal flooding.
- A case study to illustrate the scale of the benefits of mitigation.
- More emphasis on flooding as the most significant climate change risk.
- Place the natural environment, rather than behaviour change, at the heart of the Programme.
- New building standards to address overheating risk and installation of passive cooling.
- Need to monitor urban greenspace and reverse its decline.

7. Conclusions

- 7.1 A range of informed stakeholders took part in the consultation. They were typically highly-engaged and knowledgeable about relevant issues, including management of Scotland's resources, planning and delivering services, environmental matters, the development of policy and monitoring environmental change. In addition to this expertise many respondents articulated their personal views, describing fears about the scale of climate change and its impact on the environment and citizens, both in Scotland and elsewhere.
- 7.2 Participants shared suggestions, examples and reflections on ways the programme may support Scotland to mitigate or adapt to climate change in the short, medium and long term. These responses provide a useful evidence base for the Scottish Government to draw upon in the development of the final Programme.
- 7.3 The high-level response to each aspect of the consultation document was strongly positive. There was a majority view of support for every proposal put forward. While overall there was a high level of support for the vision and outcomes, the expressions of agreement, uncertainty or disagreement were more mixed than those provided in responses to the overall approach.
- 7.4 Many expressed a desire for more detail about each aspect of the Programme; typically, in relation to a policy area or matter of particular interest to the respondent. Given the broad cross-sectoral connections inherent in this Programme it may be a challenge for the Scottish Government to provide sufficient discussion to satisfy the various interested audiences.
- 7.5 A range of models, approaches and issues were put forward for the Scottish Government to consider; often concerning a particular area of policy. Comments frequently aligned into common themes, showing consistency in views and perspectives.
- 7.6 Cross-cutting themes included frequent requests for the Scottish Government's vision to convey a greater sense of urgency and ambition and emphasise the scale of change required. There were also calls for flexibility within the programme, to reflect the volatile nature of climate change and provide capacity for Scotland to respond to new evidence as it becomes available.



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