

Adapting Our Ways: Managing Scotland's Climate Risk Consultation to Inform Scotland's Climate Change Adaptation Framework

Submission from the Sustainable Scotland Network

Introduction

The Sustainable Scotland Network

The Sustainable Scotland Network (SSN) exists to support local authorities working together for a sustainable Scotland. SSN's members are the sustainable development officers and advocates from Scotland's 32 local authorities. The network provides Scottish local authorities with an effective support and improvement service on sustainable development. SSN is supported by the Scottish Government.

SSN's programme priorities are Best Value and Sustainable Development, Procurement for Sustainability, the Local Footprints Project (a partnership project with WWF Scotland) and Climate Change. SSN takes a 'one-programme approach' to these themes, ensuring that each reinforces the other and all contribute to the improved sustainability performance of Scottish local authorities.

On climate change SSN has been a leading organisation promoting the idea of a Scottish Local Authority Climate Change Programme, which is a commitment in '*Changing Our Ways – Scotland's Climate Change Programme*' (2006). Over 2006-2008 SSN convened and chaired the Scottish Local Authority Climate Change Programme Development Group, the members of which were: the Scottish Government, COSLA, SOLACE, SSN, the Improvement Service, SNIFFER, Energy Saving Trust, Carbon Trust and the UK Climate Impacts Programme. One of the key achievements of this Development Group was the development and successful launch of Scotland's Climate Change Declaration, with all Scottish local authorities signing up in early 2007. The Scottish Government confirmed its commitment to the Declaration at the SSN Conference in November 2007. Climate Change Adaptation is a central aspect of the Declaration. SSN is now an active participant in the COSLA Climate Change Task Group and Officer Support Group which, in mid-2008, effectively replaced the aforementioned Development Group.

SSN is a member of the Scottish Climate Change Impacts Partnership (SCCIP), including being a member of the SCCIP Steering Group. SSN has also promoted awareness of, and action on, climate change adaptation through its newsletter, website and events programme, often working in partnership with the Scottish Government and the UK Climate Impacts Programme on this agenda.

The work of SSN is guided by an active Steering Group, with members drawn from nine Scottish local authorities. The SSN is a programme of Keep Scotland Beautiful and the SSN staff team is based in the Keep Scotland Beautiful offices in Stirling. Keep Scotland Beautiful is an operating name of Environmental Campaigns (Scotland), a registered Scottish Charity (Scottish Charity Number SC030332).

Process of Developing Consultation Response

SSN has developed this consultation response through three specific routes:

- Firstly we have analysed the consultation responses developed by individual council.
- Secondly, SSN members from 14 local authorities attended a consultation workshop on 8th October in Stirling. The outputs from this event form the bulk of this consultation response.
- Thirdly, the response draws on views developed through our work on climate change adaptation over the past four years, including partnership working on Scotland's Climate Change Declaration, collaboration with the UK Climate Impacts Programme and SCCIP, and numerous adaptation-focused events.

Response to the Consultation Questions

1. Do you think what we have outlined in paragraph 4.10 constitutes the correct understanding of climate adaptation?

Please provide any additional comment. (paragraph 4.10)

The views from SSN members are mixed as to whether paragraph 4.10 provides the correct understanding of climate adaptation. The use of the IPCC definition is welcomed, and this may benefit from supplementary information drawn from UKCIP definitions and communication protocols. While some SSN members felt that paragraph 4.10 provided a suitable definition, most felt that there is a pressing need for the Scottish Government to provide a better explanation of climate change mitigation and adaptation, and that clearer and more thorough definitions were needed.

The desire for an improved definition of adaptation is underpinned by a widespread recognition that within and across local government climate change mitigation is far better understood than adaptation.

A sharper and more thorough definition of climate change adaptation needs to also make clear links to actual working practices and show how these relate to adaptation responses. There is a need to make associations with current work priorities, activities and concerns, and this should include a better explanation of the financial implications of climate change adaptation (and inaction in the face of climate change). The financial implications should include recognition that early action on climate change adaptation need not be expensive, as illustrated by the very low-cost approach used to develop Local Climate Impact Profiles by some Scottish local authorities.

SSN members thought that a fundamentally important definition and approach that the Scottish Government needs to make clear and place real emphasis on is that a 'sustainable development approach' is the key priority, that responding to climate change is part of pursuing sustainable development and that that climate change response includes action on mitigation and adaptation. This strategic, sustainable development focused and influenced approach is fundamentally important. SSN recognises that these principles are mentioned in the consultation paper, but we feel that the Scottish Government should give this higher strategic profile within the Climate Change Adaptation Framework.

2. Do you think what we have outlined in paragraph 4.11 constitutes the correct understanding of a well-adapting Scotland?

Please provide any additional comment. (paragraph 4.11)

SSN members were essentially supportive of the understanding of a 'well-adapting Scotland' outlined in paragraph 4.11, but felt that it was still very 'top line' and strategic. SSN members have a real appetite for work to be done to map out and explain in more detail the actual potential impacts and links to real events and experiences. The top-line understanding of 'a well-adapting Scotland' needs to be thoroughly fleshed out with links to lived experience, working priorities and the services provided by Scottish local authorities.

Related to the desire for a more comprehensive understanding of a 'well-adapting Scotland', SSN members pointed to the need to address the disparity of resources and support programmes/organisations specialising on climate change adaptation in contrast to the situation on mitigation. It was pointed out that there are distinct support programmes to help councils address their own-estate emissions (i.e. the Carbon Trust programme) and area-wide emissions (i.e. the Local Footprints Project, AEA datasets etc), but on adaptation there is a need to invest in comparable support programmes and partnerships. The LCLIPs work and the support provided by the SCCIP and UKCIP could be expanded to ensure a more consistent and well-resourced approach across all 32 local authorities and Community Planning Partnerships.

Finally, SSN members stressed that 'language matters' and felt that the understanding of climate change adaptation (in paragraph 4.11 and elsewhere) remains overly specialist and jargon-loaded. This results in climate change adaptation being hard to communicate and for non-specialists to connect with. SSN members felt that a communications campaign on climate change adaptation and related support networks/partnerships are vital, and we would support the Scottish Government bringing forward plans and programmes in this regard.

3. Do you think we have identified the correct strategic principles for promoting a sustainable approach to climate adaptation?

If not, do you think any of the existing strategic principles should be removed or clarified?

If not, do you think any additional strategic principles should be added, such as the four As: Awareness + Avoidance + Alleviation + Assistance? (paragraph 5.6)

Overall, SSN members are generally supportive of the strategic principles outlined in the consultation paper, but felt that the consultation paper remained far too high-level. Amongst SSN members, there is a real appetite for more detail and clearer direction. SSN members welcomed reference in the consultation paper to the Precautionary Principle and felt that this should be integrated into the Climate Change Adaptation Framework. The principles should also recognise that climate change requires decision-makers to deal with long-term agendas and uncertainty, and the Scottish Government should include in the framework guidance on dealing effectively with these challenges.

SSN members are concerned as to whether the climate change adaptation principles and priorities would be integrated across policy and legislation, to help ensure that adaptation is mainstreamed into legislative and policy across Scottish Government and local government portfolios.

An additional concern related to the use of the strategic principles was the challenge of responding to extreme impact events at one level and gradual, longer-term trends on the other. The Adaptation Framework principles and priorities need to recognise and make links to both short and long term dynamics.

A key challenge for local authorities in developing a climate change adaptation response based on the strategic principles is the challenge of dealing with long-term planning. On climate change adaptation we are often dealing with scenarios for 20 years or more into the future, and these long-term planning horizons pose distinct challenges and opportunities for local authority professional and political decision making.

SSN members would welcome more detail relating to technical, financial and legal implications of climate change adaptation – to help link the strategic principle and priority actions to matters that have more pressing influence on local authority decision-making and resource management.

4. Do you think we have identified the correct strategic priority actions for Government to promote a sustainable approach to climate adaptation?

If not, do you think any of the existing strategic priority actions should be removed or clarified?

If not, do you think any additional strategic priority actions should be added? (paragraph 5.7)

SSN members feel strongly that the priority action of 'building adaptive capacity' is extremely important and that this should be elaborated on to outline how this is going to be done. The

Climate Change Adaptation Framework or any associated implementation plan should talk explicitly about training within the public sector, detailing who, what, when and how.

SSN members would also welcome clarity and detail on the following aspects of a Climate Change Adaptation Framework:

- A mapping of the issues arising from climate change adaptation and related to being a well-adapting Scotland
- The roles and responsibilities of different sectors, organisations, services and professions
- A catalogue of examples of good practice demonstrating the reality of being a 'well adapting' organisation/local authority/Community Planning Partnership. We need more examples, real or theoretical, of how to be 'a well adapting' local authority and/or Community Planning Partnership, and these need to be better communicated.

In providing clarity and detail on the above, SSN members would stress the need for the Scottish Government to view local authorities not as single homogeneous entities, but as diverse organisations with different departments, services and objectives and roles. The Climate Change Adaptation Framework needs to be made relevant to specific audiences (i.e. similar to UKCIP's focus on specific sectors) in order to relate directly to different departments, professions, services, functions, and duties. Therefore, this calls for much more targeted, audience specific guidance. The SSN's Best Value and Sustainable Development Toolkit provides one example of how this could be done, as the toolkit takes the duties embodied in the Local Government in Scotland Act and explains what these mean to different local authority services, departments and functions. Possibly a similar 'Climate Change Adaptation Toolkit' for Scottish local authorities and/or Community Planning Partnership (CPP) would be an effective way of explaining what climate change adaptation means for different parts of local government and/or Community Planning Partnerships. This could also help engender a consistent and coordinated approach to climate change adaptation across local authorities and/or Community Planning Partnerships. Collaboration with UKCIP and use of existing UKCIP tools and materials would be extremely important in developing any such resource.

The SSN proposes that the climate change adaptation framework should address adaptation from a legal perspective (what must be done), a policy perspective (what should be done), a scrutiny/audit/reporting perspective (what did get done) and a technical perspective (how to do it).

SSN would propose that the Adaptation Framework could also usefully make a distinction between adaptation processes (management structures, reporting, training, awareness etc) and adaptation 'tangibles' (such as major development areas, land-use plans, construction projects, etc) where evidence of being a well-adapted development should be explicit.

SSN members would welcome more guidance on resourcing a 'well-adapting local authority or Community Planning Partnership (CPP)'. It was felt that this would allow creative, cost-effective approaches to be identified, such as peer-support/learning, targeted expert inputs, collectivised approaches to training, effective networking and partnership development. An outline of how local climate change adaptation can be efficiently resourced could also promote CPP collaboration and pooled funding.

Similar to work on area-wide mitigation, SSN members felt that climate change adaptation scenarios are critically important to help inform decision-making. Based on recent statements from leading climate change scientists (including DEFRA's Chief Scientific Advisor and Tyndall Centre staff member Professor Robert Watson, and the Met Office), a critical question that such scenarios would need to address is "what does 'planning to adapt to a 4 degree centigrade temperature rise' actually mean?". Scenarios should look beyond flooding and severe weather events (which can often be the only focus of local climate change adaptation concerns). Scenarios should help local authorities to better understand supply chain and service continuity issues.

SSN members point to the need for public sector decision-making to evolve and note that improved awareness and understanding is needed, as well as changes to risk-management frameworks – where climate change can often be discounted due to being perceived as low risk and not immediate.

Reference should be made in the framework to established local authority practices and structures that are useful for climate change adaptation, for example flood liaison and advice groups, watercourse maintenance regimes, flood warning schemes etc.

At a practical policy level, SSN members would encourage the Scottish Government to include work on Single Outcome Agreements within the Climate Change Adaptation Framework. Reference in the consultation paper to the National Outcomes (in paragraph 5.3) is welcomed. The Adaptation Framework should outline how climate change adaptation matters to the 15 National Outcomes and how adaptation should be factored in to the Single Outcome Agreements which seek to contribute to the achievement of these Outcomes.

SSN member would also support the development of a national indicator-type approach, based on the work that supports the National Indicator 188 in England. It was felt that such an approach would be useful in Scotland, as it would encourage a consistent but flexible approach across all local authorities and would enable improved self-assessment, peer-review and public reporting.

Finally, in terms of priority actions, there is a need for expanded and enhanced training, especially Continuing Professional Development, to help local authority staff to deal with climate change adaptation. The SSN would recommend the Scottish Government take an overview of this requirement, to assess where the skills, knowledge and expertise gaps and capacities lie and how an improved training service can be offered and supported.

**5. Do you think these are the most pressing challenges for organisations responding to critical weather events?
Please provide any additional comment. (paragraph 6.4)**

In terms of the challenges listed in the consultation, SSN has no disagreement with these.

In relation to the 'provision of timely public advice', SSN members would highlight the following issues which we'd recommend the Scottish Government factor in to the Climate Change Adaptation Framework and the implementation of any adaptation programmes:

When communicating information it is vital to avoid 'mixed messages' and preparation for good communications should be addressed through staff training and contingency planning. Public information should provide clear guidance on what practical steps individuals should take, including preparedness planning (i.e. moving furniture), insurance cover, etc. Critically important is the need for public agencies to be able to deal effectively with the stress caused by critical weather events. Again, training, capacity building and public sector collaboration will be important in dealing with the non-physical impacts induced by critical weather events.

Additional communications issues raised by SSN members more generally are concerns about the resilience of the mobile phone network in emergency situations, and the ability of public sector organisations to access this network. The mobile network will be a critical asset for public communications and we would urge the Scottish Government to clarify the situation, and deal with any weaknesses, regarding resilience and access.

In relation to 'accessing resources within own organisation' SSN members stressed the reality that resources can be finite and that the challenge is to better match expectations with capacity. This points to the need for climate change adaptation preparedness and contingency planning, whereby public agencies including local authorities, can better assess their ability to respond and how they would deal with excessive demands and impacts. The SSN would also draw attention to the experience of recent severe flooding in England (notably Carlisle) when emergency services struggled to secure access to resources and communications networks. The SSN would welcome the Scottish Government doing more to

spread awareness of these past experiences and to build these into existing contingency/emergency planning and risk management processes.

In addition, the following points were also considered to be important, and SSN would urge the Scottish Government to factor these in to forward plans for climate change adaptation activities in Scotland:

We would welcome a proactive approach to accessing resources from outwith local authority boundaries, and a clear and managed approach to co-ordinating resources between local authorities

The SSN feels that more could be done to address the longer term scenarios and impacts of climate change. SSN members felt that there is far less focus on longer-term events than with acute incidents, and they would welcome the Scottish Government clarifying who monitors events, how these are built into contingency/emergency planning and who is formally responsible for what role when addressing long-term impacts of climate change.

In relation to investment decisions and the availability of resources, SSN members highlighted that uncertainties exist on if and what resources are needed, and what the paybacks are in having resources on call to deal with events. SSN members believe that more financial resources are needed, and they would welcome clarification from the Scottish Government on these financial planning matters within the climate change adaptation framework.

SSN members also highlighted the need for improved and expanded training on dealing with emergencies and factoring in climate change adaptation – similar to points made above on capacity building – and that this training should address matters such as:

- need to up-rate how risk managers measure of the risks posed by climate change
- responding to disasters
- engaging finance managers in the issue of resource management informed by climate change scenarios

6. What do you think are the most pressing challenges for organisations planning for critical weather events? (paragraph 6.4)

SSN members highlighted the following challenges facing local authorities if climate change adaptation and planning for critical weather events is to improve within local authorities and public agencies:

There is a need to embed climate change adaptation and critical weather event planning into existing plans, particularly town and country planning, including principles such as:

- stopping development on flood plains
- avoiding policy conflicts – there should be consistency of action between services
- town and country planning/buildings standards need to be raised in line with climate change adaptation and mitigation objectives.
- Factoring climate change scenarios into contingency and risk plans
- Factoring climate change adaptation and mitigation into all public sector plans, ensuring that this is addressed as a requirement of the SEA process. This will also entail taking action when existing plans are reviewed and providing better guidance on climatic factors (adaptation) for SEAs

SSN members stress the need for consistent decisions which adopt sound climate change planning principles. We need to link a broad range of plans, especially land-use plans, with the impacts these can have on increasing or reducing the likelihood of severe weather impacts (for example, measures such as retaining green soak-aways rather than developing these would have positive implications for climate change adaptation and reducing the likely impact of severe weather).

SSN members have concerns about the pressure and competition for funding within local government and that climate change adaptation work is not secured through any ring-fenced funds. SSN would urge the Scottish Government and local government to seriously consider

how to ensure that adaptation activities are adequately addressed across all local authorities – whether through the introduction of a statutory driver, agreement on consistent approaches and performance reporting, identifying distinct funding streams or a combination of these. SSN would welcome the inclusion of climate change adaptation as a factor/indicator in the Single Outcome Agreements (reflecting the use of National Indicator 188 in England). Additionally, SSN would welcome moves to ensure consistent local authority performance monitoring and reporting on climate change adaptation (in keeping with the commitments in Scotland's Climate Change Declaration) and support to ensure effective peer-support and learning within and between local authorities (building on SSN current range of learning events and communications activities for instance).

SSN members consider that there is a need for local authority adaptation strategies to be developed, and that the newly emerging Local Climate Impacts Profiles work could be used as a basis for these.

SSN members also felt it important to recognise Scotland's role as a potential 'host' for displaced people from climate events, and urged that these must be planned for.

Finally, SSN members would also urge the Scottish Government to address the following issues when developing the Climate Change Adaptation Framework: the need to make Scottish infrastructure more resilient to climate change scenarios; in relation to flood mapping, Scottish Government and local authorities need to address issues of 'red-lining' which makes insurance difficult/expensive/not possible.

**7. Do you think we have identified the right role for the Scottish Government in supporting climate adaptation in Scotland?
If not, what would you add to, remove from or clarify about this role?
(paragraph 6.8)**

The SSN considers that the consultation paper provides a reasonably comprehensive and appropriate role for the Scottish Government in supporting climate change adaptation in Scotland. However we would propose that the Scottish Government, in developing the second-stage consultation and the Climate Change Adaptation Framework, should also address the following roles and un-resolved issues:

- SSN would like to see a stronger commitment to adaptation by the Scottish Government, including more leadership from the government.
- The Framework needs to be more than just encouraging change. It needs to include more directive, mandatory priorities and actions for local authorities. Links could be made to existing legislation (i.e. Local Government in Scotland Act 2003, National Planning Act, Flood legislation, etc) and to forthcoming legislation (Climate Change Bill, etc), as well as national policy priorities such as the National Outcomes and the related Single Outcome Agreements.
- Based on the above, SSN members would like to see mandatory reporting against SMART objectives, supported by training, more guidance and best practice indicators. These should be incorporated into the framework. (The SSN recognises the challenges of developing this robust approach to adaptation activities, and that the approach taken to date in England has been more qualitative focusing on e.g. processes which can be implemented).
- While leadership is vital, SSN would suggest that we also need on-going monitoring and review, both top-down (through reporting, audits, etc) and bottom up (through consultation on progress, listening to lessons on the ground etc). The principles of continuous improvement and organisational learning, as embodied in the Local

Government in Scotland Act, should be referred to and used to frame this approach to climate change adaptation.

- SSN would suggest that the Scottish Government expand the role of education and information provision in the framework, and the Scottish Government's role in supporting and directing this across sectors.
- Developing a more informed and proactive climate change adaptation approach across Scottish local authorities and the wider public sector will have practical, direct cost implications. The Climate Change Adaptation Framework needs to recognise that, for local authorities, becoming well-adapting cannot all happen within 'business-as-usual' approaches. The Scottish Government's commitment to adaptation should be reflected in additional resources allocated for adaptation activities and processes. While the sums invested may actually be modest, SSN would stress the need to formally address the 'resourcing' role of the Scottish Government (and local authorities/CPPs) within the Adaptation Framework.
- The Scottish Government should use the framework to clarify the mechanisms that need to be put in place locally to better deal with climate change adaptation. These mechanisms will need to clearly identify roles, responsibilities, participants and remits. Scottish Government and local government should work together to agree and promote a clear and consistent approach to developing and maintaining local climate change adaptation mechanisms, possibly within the context of Single Outcome Agreements and Community Planning Partnerships.

SSN members would also recommend that the Adaptation Framework should map out the roles and responsibilities of the Scottish Government outwith Scotland. Of particular relevance is the role to be played by the Scottish Government at UK and EU levels. The Framework should also recognise the international responsibilities of the Scottish Government, referencing the role that the Government can play in international development and co-operation. This could relate both to collaboration on the technical and research challenges of climate change adaptation and also cooperative action between Scotland and other countries to improve adaptation responses. Of particular importance is the role of the Scottish Government in helping support climate change adaptation in poor countries, through the Scottish Government's 'international development programme', including through knowledge exchange and technical and financial assistance.

8. Which key audience groups/ organisations/ bodies do you think the Scottish Government should be communicating with about climate adaptation? (paragraph 6.19)

Reflecting the significance of climate change and the adaptation implications it poses for all sectors of society, the list of key groups, organisations and bodies that the Scottish Government should be communicating with about climate adaptation is extensive. At the SSN consultation meeting on 8th October, SSN members identified the following list of key groups that would need to be included in this work:

UK & EU governments & government departments

Other devolved governments – Wales, Northern Ireland

Local Authorities

COSLA

Community Planning Partnerships

Voluntary Sector organisations

Community Groups

Community Councils

CVSs

FINAL VERSION

SOLACE	Sports Organisations
LA Officer networks (SSN, Finance, Planning, etc)	SURF & other regeneration networks and organisations
Local authority consultee lists (e.g. SEA lists, etc)	Social Housing Sector
Health Service and Health Boards	Financial institutions
Universities and colleges	Insurance industry
The Macaulay Institute	
Media	Building Industry groups
Schoolchildren	Architecture bodies (RIBA)
Individuals	Planning Bodies (RTPI)
Environmental Agencies – SEPA, SNH	Scottish Enterprise network
Historic Scotland	CBI and other business associations
National Parks	Professional Associations
Forestry Commission	Trade Unions
RSPB	H&S Exec
British Waterways	Scottish Water
Other Environmental NGOs	
Crofters Commission	Private Transport Companies – bus, rail
Scottish Landowners Federation	Road and rail planning and maintenance – local and national.
Estate owners and managers	Transport Scotland
Emergency planning	Tourist Board (and tourist industry bodies – challenges and new opportunities)
• Emergency and rescue services	Agriculture & Fisheries
• Aid Agencies	Manufacturers
• Armed forces	Power Companies
• Media	Oil Companies (especially those currently working in the North Sea)
• Food suppliers	

The key challenge therefore is one of priorities, timescales, coordination and getting the messages right for the intended audience. To this end, the SSN would urge early and detailed action to engage with local authorities (both at corporate and political levels) and their individual professions, departments and services. SSN is keen to continue working with the Scottish Government in order to develop and support improved climate change adaptation responses by Scottish local authorities. We would welcome enhanced investment, both in the Scottish Climate Change Impacts Partnership (SCCIP) and in the SSN itself, to help support this work.

-ends-