

Consultation on the Draft Scottish Climate Change Adaptation Programme



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

✓

1. Name/Organisation

Organisation Name

Transform Scotland

Title Mr Ms Mrs Miss Dr Please tick as appropriate

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3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

- (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes No

CONSULTATION QUESTIONS

1 Views on the Overarching Framework

1a To what extent does the overarching framework of the Programme outlined in Figure 1 set an appropriate long term direction for climate change adaptation in Scotland?

Fully Mostly Partially Poorly *Tick one box only*

Comments: The structure of the framework along the lines of Environment, Infrastructure and Society provides good focal points from which to develop relevant lines of study.

1b Does the overarching framework address the current and predicted impacts to Scotland identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly *Tick one box only*

Comments: Insofar as these can be identified at this stage, given that the science of climate change is only now gaining global acceptance in the light of recent extreme weather events and accumulating observational data.

2 Views on the Natural Environment Theme

2a Do objectives **N1**, **N2** and **N3** collectively set an appropriate long term direction to ensure that Scotland's natural environment is able to adapt to our changing climate?

Fully Mostly Partially Poorly *Tick one box only*

Comments: The progressive nature of Themes N1-N3 from understanding through support and adaptation, should allow a sustainable outcome as far as possible. The only problem may be that the effects of climate change become so extreme as to be incapable of remedy; hence the need to also address mitigation measures.

2b To what extent will the policies and proposals listed under objective **N1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly *Tick one box only*

Comments: The comprehensive programmes of research, monitoring and data evaluation should allow medium to long term trends in the terrestrial and marine environment to be detected and pre-emptive action taken to ameliorate adverse effects. It will, however, need ongoing modification in the light of new knowledge and understanding.

2c To what extent will the policies and proposals listed under objective **N2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: Planning issues need to be addressed in several areas, such as: stricter control of building in flood plains to avoid future problems (N2/18); maintenance of Green Belt policy to avoid further loss of natural habitat and to reduce urban sprawl (with associated increased car use) (N2/2).

2d To what extent will the policies and proposals listed under objective **N3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: No comment.

2e Taken together, do the policies and proposals listed under objectives **N1**, **N2** and **N3** address the current and predicted impacts to the natural environment in Scotland identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly Tick one box only

Comments: The policies and proposals are comprehensive and well thought through but must ensure that adaptation is not used as a way of minimising mitigation actions.

3 Views on the Infrastructure and Built Environment Theme

3a Do objectives **B1**, **B2** and **B3** collectively set an appropriate long term direction to ensure that Scotland's buildings and infrastructure networks are able to adapt to our changing climate?

Fully Mostly Partially Poorly Tick one box only

Comments: No comment.

3b To what extent will the policies and proposals listed under objective **B1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: Policy B1/14 will need careful study because indications are that the

existing sewerage infrastructure is, in many cases, unable to cope with the very high flows resulting from intense rainfall events. This will require investment in larger capacity drainage networks and, perhaps, storm water systems.

3c To what extent will the policies and proposals listed under objective **B2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: B2/3; the introduction of water metering may be more effective at reducing water use, with tapered charges to protect low income households: B2/6; the quality of new house build needs to be substantially improved as it compares poorly with many other European countries in terms of insulation and energy efficiency: B2/16; should consider transfer of much long distance haulage from road to rail, which is generally more resilient to snow and ice.

3d To what extent will the policies and proposals listed under objective **B3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: No comments

3e Taken together, do the policies and proposals listed under objectives **B1**, **B2** and **B3** address the current and predicted impacts to Scotland's buildings and infrastructure networks identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly Tick one box only

Comments: No comments

4 Views on the Society Theme

4a Do objectives **S1**, **S2** and **S3** collectively set an appropriate long term direction to ensure that our communities are able to adapt to our changing climate?

Fully Mostly Partially Poorly Tick one box only

Comments: The objectives S1-S3 cover a good range of important issues, including house building standards and fuel poverty. The first will be important in relating to reducing storm damage due to higher wind velocities, which are predicted to increase.

4b To what extent will the policies and proposals listed under objective **S1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: Objectives S1/1 and S1/2 seem a strange mix, dealing as they do with food-borne pathogens and flood-prone communities. Should this also include impact on communities from loss of infrastructure due to storm damage etc?

4c To what extent will the policies and proposals listed under objective **S2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: We would include a strong emphasis on educating the public at large of the serious dangers from climate change because, at the moment, the general public is ill informed by the popular press of the seriousness of the threat. The SG should raise public awareness of the extent to which science is now agreed on the impact of fossil fuel emissions and of the need to act, at a national and personal level, to mitigate and adapt.

4d To what extent will the policies and proposals listed under objective **S3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully Mostly Partially Poorly Tick one box only

Comments: Expanding the role of the Fire Service to enable it to undertake a wider variety of natural disasters is a good initiative as they are the best service to undertake such a role, which is best carried out by a public body able to respond rapidly. Flooding events are likely to increase in frequency and the Service will need training and equipment (boats etc) to allow them to operate effectively.

4e Taken together, do the policies and proposals listed under objectives **S1**, **S2** and **S3** address the current and predicted impacts to Scottish society identified in the UK Climate Change Risk Assessment?

Fully Mostly Partially Poorly Tick one box only

Comments: Seems a comprehensive and well thought out series of measures that should cover many foreseeable events and has the capability of modification in the light of future knowledge.

5 Views on the Role of Others in Delivering the Programme

5a What support will public bodies require in meeting their duties to help deliver the programme?

Comments: Public bodies will require adequate financial and legislative support to allow them to meet the future. They are also the best group to undertake emergency and other work because they can be called out rapidly in response to situations as a public service without contractual and other private sector complications getting in the way of response.

5b Are the arrangements for ensuring public engagement and for involving employers, trade unions and other stakeholders in meeting the programme objectives sufficient?

Yes No

Comments: We have been impressed by the range of activities undertaken in recent years to raise business and public body awareness of the issues.

6 Views on the Environmental Report

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

Fully Mostly Partially Poorly *Tick one box only*

Please give details of relevant sources:

Climate factors are well covered although more recent IPCC reports indicate that effects of climate change are taking place more rapidly than modelled (rate of polar ice melt; warming of oceans) so effects may be more severe, more quickly, than anticipated.

Air quality is mentioned but, in fact, inner city air quality continues to be poor because little attempt has been made to reduce car dependency, one of the main causes of this poor air quality.

Road and rail infrastructure are highlighted as more vulnerable to the effects of climate change and in our opinion this requires preferential investment in rail to reduce freight and commuter travel by road because the rail network would thereby cost less to maintain.

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

Yes No

Comments:

Yes, in general, although our fear is that the extreme weather events may be more frequent and more intense than presently anticipated.

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

Yes No

Comments:

6d Do you agree with the proposals for monitoring of the environmental effects of the draft programme set out in the Environmental Report?

Yes No

Comments:

6e Are you aware of any further environmental information that will help to inform the environmental assessment findings?

Yes No

Please give details of relevant sources:

6f Are you aware of other 'reasonable' alternatives to adaptation programme and its content that should be considered as part of the SEA process?

Yes No

Please give details of relevant sources:

7 Additional Comments

7a Please provide any additional comments you would like to make on the draft Scottish Climate Change Adaptation Programme.

Comments:

The report is well prepared and covers a tremendous amount of ground. Our only concern is that it seems to pre-suppose that much of business continues as at present, rather than addressing the causes of our present dilemma: the over-use of fossil fuels in energy production and transport.

We would like to see adaptation measures in the way of reducing private transport and, instead, investing in public transport to achieve modal shifts from car to bus, train and tram. We also want to see more investment in active travel, such as better walking and cycling infrastructure, to allow commuters and school children, to travel safely within congested city areas.

We would also like to see the transfer of heavy goods vehicles from road to rail over longer distances. Hence it is deeply counter-productive that the Scottish Government's own investment priorities (e.g. £6bn for dualling A9 & A96) will specifically undermine the opportunities for rail freight to competition with road haulage.

Expansion of air travel should be discouraged, rather than encouraged, as is the current trend based on questionable economic grounds. It represents one of the most potent and increasing sources of GHG emission despite the claims of 'cleaner' engines.

In other words, adaptation should include a strong element of behavioural change to prevent us going further along the wrong road as we have done in the past several decades. This would then deliver adaptation with a strong element of mitigation built in.