

CONSULTATION

Response Document



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Scotland's Climate Change Adaptation Programme 2019- 2024

(Scottish Government)

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Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

Comments from CIEEM

Introduction

We welcome the opportunity to participate in the consultation on Scotland's Climate Change Adaptation Programme 2019-2024. We would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Policy and Communications Manager) at JasonReeves@cieem.net with any queries.

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

Yes, an outcome-based approach has the potential to promote co-ordinated working across sectors, as long as the targets and deliverables are clearly recognised in different sectors and they do not fall between organisations.

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

Yes, with the focus to engage sectors that are not presently considering climate change implications and adaptations.

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

Yes, changes will have to be made across a large number of sectors to adapt to a changing climate especially land management.

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

Yes, although this should build on the work already being undertaken by ClimateXChange, SEFARI, HEIs and conservation NGOs and forge better links with these to land managers, farmers and community groups.

Many of the impacts of climate change, such as species moving northwards, including invasive species, can be effectively detected using citizen science approaches, such as the spread of the Tree Bumblebee. Therefore, consideration should be given to the inclusion of the biological recording community and record centres, bearing in mind the recent SBIF review.

Species declining because they are at the edge of their climatic range require long-term monitoring and consideration of other impacts that can be mitigated against such as grazing pressure. Knowledge of the species most at risk is fairly well documented and measures to monitor these and evaluate potential mitigation measures should be considered. A number of initiatives have ended or been reduced in their scope because of insufficient funding, therefore, resources should be made available to carry out long-term monitoring such as that of snow patches that was carried out by Adam Watson.

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

Yes, but the adaptations should go beyond what is stated and actually incorporate adaptations to reduce greenhouse gas emissions. Commitments should be made to mitigate against further climate change by working to reduce carbon emissions.

Community engagement is essential as this will help ensure that communities buy into adaptation with a level of interest and ownership. Community engagement will also help to identify the needs of communities and to help build resilience, which is particularly important in remote sparsely populated areas of Scotland.

Adaptation is about understanding what has to be done now and in the future, therefore this document should not be static and should be developed over time, identifying additional risks and plans to reduce threats. It will therefore be an iterative process.

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

As above. 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.

7. Are there any additional policies that should be included in the outcomes?

Biosecurity policies should be incorporated into the plan as climatic restrictions that may have limited both initial invasion and species spread may be lifted. In the forestry sector there is likely to be a higher risk of pests and diseases. The predicted increased occurrence of high flow events will likely increase the risk of the spread of riverine invasive plant species as a result of increased dispersal of seeds and vegetative fragments but also by the creation of bare sediment patches for rapid colonisation. In addition, certain vector-borne diseases (ticks and lymes) are likely to increase.

Planning and land-use policies should be included, for example, preventing development on current and future/projected floodplains and the use of greenspace for carbon storage and water management. The planning application process for new builds and infrastructure projects should consider what possible adaptations can be incorporated to allow resilience to future climate change impacts. We feel that much more progress could be made with additional environmental provisions being incorporated into new infrastructure and developments, including buildings and extensions. Building resilience into housing, especially climate-proofing new residential developments and retrofitting existing buildings, should happen but will require resources. As well as big renewable projects, new residential and industrial developments should incorporate renewable sources of energy production such as solar panels.

Under the communities adaptation behaviours section, home owners should be discouraged from tarmacking their gardens and driveways and restricted from using artificial grass and other measures which do not allow adequate surface drainage. At times of peak rainfall these move water faster down the catchment and instead it should be slowed down.

Peatland management policies which would target peatland degradation should be referenced, such as Peatland Action. Peatlands are an important carbon store and carbon is sequestered by a number of land uses and this must be managed appropriately. Nature-based solutions such as Peatland Action should be given much more prominence in the plan.

Sub-outcome 2.3 – investment should be made in the rail sector and bus services in rural communities should be subsidised. Further safe walking and cycling routes to schools should be developed. Improving and increasing active travel infrastructure for cycling and walking in our urban environment should also be included in all new urban planning legislation to contribute to a healthier, greener and more sustainable environment.

Sub-outcome 4.1 – if ScotRail is the biggest contract let by Scottish ministers this level of investment should require improved reliability, service provision and value for money.

In the agricultural sector, the predicted increased incidence of high rainfall events will likely lead to further soil erosion. Adaptations in farming practices to minimise the loss of soil such as winter crops should be encouraged.

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? (Please give details of additional relevant sources)

Much more could be made of potential mitigation measures to reduce other threats to habitats and species that are likely to be impacted with climate change.

The impact of changes in the timing of seasonal events and migration patterns is not discussed.

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

There is comprehensive coverage of the list of likely predicted environmental effects. Proper incorporation of local development plans and the planning process is needed. Development pressures have and are continually resulting in building on floodplains. Catchment scale management approaches are required.

Under outcome 2, provision should be made for supporting people in remote rural areas who are on a private water supply where continued access to water may be threatened during prolonged dry spells. The issue of climate change impacts on water resources does not appear to be integrated into the plans and the focus to date has largely been with respect to flood risk.

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?

The governance body should include non-governmental representatives covering a range of sectors to evaluate existing monitoring and identify gaps in monitoring and further research needs.

There is a clear need for a multi-agency approach to monitoring with peer review research underlying it, with the aim to develop the understanding of the effects of climate change and the potential impacts on the natural environment. An adaptation tool was proposed to be developed as part of SEWEB but it is not clear whether this is now available and also what will link this to the information on Adaptation Scotland's website, and promote the use of both of these information sources more widely.