Response ID ANON-VC83-WFFE-C

Submitted to **Scotland's Climate Change Adaptation Programme 2019-2024**
Submitted on **2019-04-01 15:18:56**

Questions

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

Yes

Any comments: :
We welcome the outcome-based approach to adaptation, in particular those which are cross cutting, encouraging government to work across traditional sector boundaries. However, several outcomes are focused on traditional 'sector' themes (e.g. natural heritage, infrastructure, marine). We consider that this may reduce opportunities to make explicit the co-benefits of particular outcomes. Our responses to question 6 and 7 explore this further.

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

Yes

Any comments: :

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

Yes

Any comments: :

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

Yes

Any comments: :

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

Yes

Any comments: :

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

Yes

Any comments: :
We are broadly content with the outcomes set out in the consultation draft. However, whilst the historic environment is a theme which has relevance cutting across all the outcomes, its visibility is largely restricted to Suboutcome 1.2 and Communities Adaptation Behaviour 4. As a result, potential co-benefits that could be gained from embedding historic environment policies within other areas of the SCAAP are less likely to be recognised and delivered. We have provided some specific recommendations for addressing this issue under our response to question 7.

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

Yes

Any comments: :
Sub-Outcome 1.2
• We recommend replacing 'research for buildings and heritage sites' with 'research for buildings and heritage assets'.
• We recommend replacing 'Historic Environment Policy 2019-2029' with 'Historic Environment Policy for Scotland' and replacing the description with 'HEPS sets out a series of principles and policies for the recognition, care and sustainable management of the historic environment. It recognises the challenges that climate change creates for decision-making affecting the historic environment'
• We recommend including 'Our Place in Time: the historic environment strategy for Scotland' under policies.
https://www.gov.scot/publications/place-time-historic-environment-strategy-scotland/

Communities – Adaptation Behaviours
• We recommend rewording point 4 to read: 'Scotland's historic and traditional buildings were designed and built to cope with the climate but as weather patterns change, it is becoming even more important that they are properly maintained. Historic Environment Scotland have resources to help you to understand your property, learn how to maintain it, and increase its resilience to extreme weather events.'

Outcome 3
• We recommend that you consider whether tourism has a place under this outcome. Tourism is a growing industry that contributes to, and is impacted by,

climate change in numerous ways. For information, income generated by Scotland's historic environment sector in 2017-18 has risen to over £4bn, with the growth attributed to increasing tourist numbers (up to 18m visitors in 2018), particularly international visitors. (Source: OPiT Annual Performance Report, published February 2019).

Outcome 5
• We advocate a holistic approach to the environment which recognises that every part of a landscape has a relationships with every other part, and that natural and cultural assets, benefits and outcomes are often interlinked and interdependent. In view of this, we recommend that the relevant historic environment policies listed under Outcome 1 are also included under Outcome 5.

Outcome 6
• The historic environment is a key element of Scotland's marine and coastal environment. Whilst the SEA identifies that risks to cultural heritage assets are amongst the key environmental impacts of climate change relevant to this outcome, the sub-outcomes and policies do not address this. We recommend that to support positive effects for cultural heritage as a result of this outcome, relevant historic environment policies should be included under this outcome.

Sub-Outcome 6.1
• For information: at the invitation of MCCIP, Historic Environment Scotland has led on a new MCCIP Special Topic Report Card on Cultural Heritage, which is undergoing peer review and is due for publication shortly.
• We recommend that the policy information regarding MPAs should these of course also cover Historic MPAs, of which there are currently eight. There are also two currently proposed.

Sub-outcome 6.2
• For information: one of the Dynamic Coast 2 supersite case studies is Bay of Skaill and includes HES Terrestrial Laser Scan monitoring of Skara Brae etc.

Sub-Outcome 7.3
• Under "Other international connections on adaptation", you could include reference to HES as a founding member of the international Climate Heritage Network, which facilitates learning from and supporting international partners in adaptation. Reserving heritage has a crucial role in boosting disaster resilience. See http://www.unisdr.org/conferences/2017/globalplatform/en which makes a series of recommendations to strengthen investment in 'human infrastructure'

Strategic Environmental Assessment

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.:
We are content with the accuracy and scope of information used to describe the historic environment baseline.

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

What are your views on the predicted environmental effects as set out in the Environmental Report?:
We are broadly content that the Environmental Report has identified likely effects on the historic environment as a result of SCAAP2. We have the following detailed comments to offer:

• At 4.5.6 you note that: 'future actions to provide more resilient supporting systems have the potential to result in mixed/uncertain effects on a range of SEA topics. For example, there is potential for negative effects on the landscape from adaptation responses such as new renewable energy infrastructure.' We consider that the assessment should note that new renewable energy infrastructure also has the potential for negative effects on the historic environment.
• We would have expected 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.
• The assessment of Outcome 6 identifies risks to cultural heritage as being amongst the key environmental impacts of climate change relevant to this outcome. However, the assessment does not find that the outcome will address key environmental impacts of climate change on cultural heritage. We agree with this finding, and support the opportunity for enhancement which recommends a focus on actions which support measures for marine heritage to adapt to climate change. However, without the inclusion within the Programme, under Outcome 6, of relevant narrative and policies relating to historic environment, it is not clear how this enhancement can be delivered.

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?

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?:
We are broadly content with the findings of the SEA, subject to the comments at Question 9, and with the proposals for mitigation and monitoring. However, it is not clear how far the identified mitigation measures and opportunities have influenced the content of the draft Programme, and we consider that further work will be required to ensure that the content of the Programme reflects the full potential of the enhancement recommendations.

About you

What is your name?

Name:
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What is your email address?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Historic Environment Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

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?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Neither satisfied nor dissatisfied

Please enter comments here.: