

1. Are you responding as an individual or on behalf of an organisation? If you're responding on behalf of an organisation, please provide the organisation's name.

Individual

Organisation

Name of organisation: **Natural Resources Wales**

We've identified some potential actions to adapt to climate change over the next five years but want to know how you think we should take these ideas forward and what else could be done.

When we refer to 'actions' in this consultation, we mean those detailed in Part 2 of the Climate Change Adaptation Plan for Wales.

2. Overall, to what extent do you agree with the potential actions for adapting to climate change set out in this document? (1=completely agree, 5=completely disagree)

1

2

3

4

5

Please explain the reasons for your answer:

Several elements of UK and Welsh legislation combine to form the policy framework for adapting to climate change in Wales (see **Annex 1**). When undertaking any particular exercise within that framework it is crucial to make the appropriate inter-connections. The Draft Climate Change Adaptation Plan for Wales (referred to as "the Plan" from here) correctly identifies the most recent UK Climate Change Risk Assessment (UK CCRA2) as the source of the definitive list of climate risks facing Wales. We note the decision to consider only the more urgent risks (categorised as "more action needed" or "research priority"). However we would also advise on the need to retain focus on sustaining current action to help ensure that the Plan links the "here and now" and future action. We recommend therefore that the Plan should consider all the risks in UK CCRA2 in order to present a complete, integrated picture.

There is a growing realisation that risks interact within and around particular places. We therefore recommend greater emphasis on adopting a place based approach .

3. Please tell us if you have any ideas for how we should deliver the potential actions for adapting to climate change.

We understand that the draft Plan was developed by a steering group of Welsh Government officials, drawn from the various departments, and that external views were gathered using existing communication channels. Since the Plan is described as a “Plan for Wales” (as opposed to a plan for Welsh Government), and since it recognises the need for actions by others, we feel that the steering group from now on should include key external stakeholders. This would allow inter-dependencies between organisations to be explored and resolved.

It is worth noting here that both Scotland and Northern Ireland have set up bodies to coordinate climate adaptation work, whereas Wales has no such organisation. This can pose practical difficulties for those wishing to engage with the Welsh adaptation community.

Opening up the steering group to include key external stakeholders can help develop the “Adaptation Community” in Wales – those people from across the country and organisations who are actively engaged in adaptation work. Since the former Climate Change Commission for Wales was wound up we have had no recognised forum for discussion and overall adaptation capacity has suffered.

Building on the observation that climate risks interact, there is a wider issue that climate change arises primarily from energy use by the full range of human activities, and that, in turn, it affects all our activities. It cannot, therefore, be addressed as a standalone issue and it must be viewed alongside all other trends. We would welcome, therefore, a more explicit linkage to the Welsh Government Ministers Future Trends Report, and the information contained there.

We also suggest that Welsh Government should consider seriously the potential benefits of implementing its Reporting Power under the Climate Change Act requiring specified public bodies to submit adaptation reports. How this ties in with partnership working through the Public Services Boards (PSBs) (and other regional partnerships) would require careful thought.

4. We strongly believe everybody has a role to play in adapting to climate change. What ideas do you have to adapt and contribute to our objectives?

NRW will contribute through our formal roles identified in the overall adaptation framework. These include:

- Preparing Area Statements under the Environment (Wales) Act, which factor in being resilient to climate change.

- Working with PSB partners to prepare Local Well-being Assessments and Plans under the Well-being of Future Generations Act. The assessments must take account of the latest UK CCRA.
- Preparing the State of Natural Resources Report (SoNaRR), which includes summarising the latest climate change trends.
- Providing advice to Welsh Government in relation to the emerging National Development Framework.

We have stepped beyond these formal roles to provide working guidance for PSBs on embedding climate adaptation in Well-being Assessments and Plans. We will continue to update this guidance as further information becomes available and the adaptation process unfolds.

The nature of our organisation's role is that we employ people with a knowledge of climate change both in the round, and in terms of its impact upon specific issues – such as flooding, water supply and biodiversity. Welsh Government often call upon us, therefore, to represent Wales's interests in relation to specific initiatives. For example, we have staff sitting on the stakeholder groups for each of the six research projects that the UK Committee on Climate Change has commissioned for the UK CCRA3.

We are conscious of the need to adopt place-based working, arising from the Environment (Wales) Act, and also from the realisation that this provides an appropriate way to consider inter-dependencies between risks and between stakeholders. We are exploring how place-based adaptation may be represented at different geographic levels:

- Individual communities, for example in our Gwent PSBs' collaborative project "Adapting to Climate Change: From People's Lived Experiences to Strategic Action".
- Local authority areas, through the Well-being Assessments and Plans.
- Regional areas, through our Area Statements.
- At a Wales-wide level, for example through a research contract "LANDMAP, landscape and a changing climate" that categorises different parts of Wales by landscape criteria and then systematically examines how those landscapes are likely to be affected as the climate changes.

It is particularly important that we continue to communicate the risks and impacts of climate change to encourage individuals, businesses and other organisations to be prepared. We also need to ensure these people and organisations are aware of Wales' adaptation efforts so they are able to access the tools available to support them. Welsh Government has made a number of commitments to improve communication in this area.

5. What else can Welsh Government do to improve communication around the risks and impacts of climate change and the need for adaptation?

At 109 pages long, the consultation document is understandably a weighty read, and is, therefore, unlikely to be read by many people outside the policy domain. The key requirement here (as with any complex subject) is to present the subject in a coherent, balanced, way at different levels of detail. The Government needs to think, therefore, of a hierarchy of documents (or information) that are linked explicitly, and which people can navigate up and down – getting into the detail as necessary. Case studies would be particularly informative, particularly if they included the name of the person to contact. A straightforward practical step would be to continue with the Adaptation Newsletter, to ensure that everyone feels up to date with developments.

We note the commitment to produce a “Young Person’s” version of the Plan and think that this concept should be broadened to be an easy “plain language” read for people of any age.

In promoting a place-based approach to adaptation we have strongly advocated a pictorial approach, as adopted, for example, by the document “Working with a Changing Climate: A guide to adaptation in the Clwydian Range and Dee Valley AONB”¹. Such images are extremely accessible and allow people from across the board to focus together on a common endeavour. We would also commend the approach taken by Adaptation Scotland, whereby different generic areas (uplands, lowlands, coastal, industrial, suburbs, city) are portrayed in paired, interactive images showing the un-adapted and adapting states respectively.

6. How can you contribute to communicating the risks and impacts of climate change and the need for adaptation?

As indicated above, we have developed working guidance on adaptation for the PSBs. Much of the information would be relevant to other audiences, and we are happy to share this freely – along with a range of presentations that we have given to NRW staff and external organisations. By the same token, we would be very interested to see presentations from others and take their messages into NRW.

We recognise that climate change affects all the things we do, and in particular ways. An important part of our engagement around climate, therefore, is to embed adaptation messaging into our communication of other issues as and when they

¹ Working with a Changing Climate. A guide to adaptation in the Clwydian Range and Dee Valley AONB

<http://www.clwydianrangeanddeevalleyaonb.org.uk/files/1996434094-Working%20with%20Climate%20Change%20pdf%20Eng.pdf>

occur .. Through this route we can promote the case for adaptation across our whole remit, including for example: flooding; drought; and the impact on biodiversity. We would anticipate publishing case studies for those particular examples where we consider the evidence is particularly compelling.

Through our actions to adapt to climate change, we want to maximise the wider benefits and minimise adverse effects for the people of Wales, both now and in the future.

7. How do you think the potential actions to adapt to climate change might affect you or the organisation you work for?

We are named as a stakeholder or delivery agent for the majority of the 32 commitments listed in the Adaptation Plan. Clearly, these actions will affect us in a very direct way.

More fundamentally our primary role as an organisation is to implement the Sustainable Management of Natural Resources (SMNR). Managing the environment in a way that restores and then maintains the full range of ecosystem services is likely to be very challenging. For example, biodiversity and ecosystem functioning may be compromised, and the emphasis of biodiversity work in NRW may have to shift or adapt.

8. How do you think the potential actions in this plan might affect the following?

- Public health

We would look first to the UK CCRA2 Evidence Report in this respect. Recognising that we are not experts here, but that a safe, healthy and resilient environment is central to public health and well-being, we work closely with Public Health Wales. Efforts to promote green infrastructure and public open space are seen as particularly important in improving public health through providing opportunities for recreation and in cooling towns and cities. We note here that Welsh Government's Natural Resources Policy prioritises "increasing green infrastructure in and around urban areas"

- Communities

Different communities will be affected in different ways as climate change impacts increase. Coastal communities are likely to be in the front line, since sea-level rise is inexorable and relatively predictable, and will, therefore, prompt Government to act. The choices facing society will be very significant, including potentially the need to relocate settlements. These choices will need to be worked through very

carefully given the scale of the disruption involved and the impact on the communities concerned.

The Welsh language

We see no particular issues relating to the Welsh language here other than the importance of ensuring communication and engagement materials are available bilingually .

- Equality

It is widely recognised that those who poorest are likely to suffer the most from the impacts of climate change. This applies internationally, with countries such as Bangladesh vulnerable to sea-level rise. A study commissioned by Welsh Government found that communities already suffering from multiple deprivation were also likely to suffer most from climate change impacts.

- Children's rights

Implementing this Plan successfully will be a real test of the Government's (and the Public Sector more generally) ability to deliver the intent of the Well-being of Future Generations Act. Of the people alive today, it is the children who will experience the impacts of climate change most severely.

9. How do you think the potential actions to adapt to climate change might contribute to achieving the national well-being goals? You can read descriptions of the goals at <https://futuregenerations.wales/about-us/future-generations-act>

We agree with the comprehensive analysis presented in this Plan, showing how it will contribute to achieving each of the seven goals. More fundamentally, in adapting to climate change we are faced with an issue that:

- Affects everyone, and all aspects of our lives.
- Will require considerable expenditure, if it is to be dealt with successfully.
- Involves many inter-dependencies between issues and organisations.
- Is accelerating.

This is likely to pose challenges for our existing systems of governance. In most cases, **potential** solutions to the challenges we face are clear; the question is which **particular** one should we adopt? These choices will become increasingly stark: do we protect highly vulnerable coastal settlements or is abandonment and

community relocation the more realistic long-term option? Questions around who decides, and how we allocate resources will become increasingly polarised.

The first step along the path to achieving consensus is likely to involve more partnership and cross-sector working, involving too those people whose lives are being affected. This will give people a better sense of others' perspectives, improve the chances of formulating "win-win" solutions and thereby encourage wider ownership of the choices made.

10. Do you have any other comments about this consultation?

As indicated above we would welcome further involvement in developing and implementing this Plan. Please could you direct any initial questions to:

Jim Poole

Email: jim.poole@naturalresourceswales.gov.uk

Tel: 03000 654457

Annex 1 Our Interpretation of the Adaptation Framework in Wales



