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Llywodraeth Cymru
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Welsh Government
Consultation – summary of responses

Draft Climate Change Adaptation Plan for Wales

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Introduction

In 2017, the UK Committee on Climate Change published its Evidence Report for the second UK Climate Change Risk Assessment (CCRA). The Wales summary of the CCRA detailed 56 risks to Wales from the impacts of climate change. In response to the report, Welsh Government committed to publishing a new Climate Change Adaptation Plan for Wales (CCAPW).

Since that commitment was made, Welsh Government has worked diligently to produce a new CCAPW, working with stakeholders along the way. In September 2018, two stakeholder events were held to discuss the first set of draft actions to be published in the Adaptation Plan and consider means to improve them.

With stakeholder feedback, a final draft of the CCAPW was then developed, setting out a framework for climate change adaptation in Wales, before then detailing 32 actions to be completed over the 5 year lifetime of the plan. That final draft was published for public consultation in December 2018 and this document sets out the summary of responses and our next steps towards publishing the final and full version of our Climate Change Adaptation Plan for Wales.

Policy context

Wales, like the rest of the world, is already beginning to feel the impacts from climate change. We are experiencing more rain in the winter meaning flooding is becoming more common. Hotter summers have led to issues for farmers. We can expect to see more issues too, such as from rising sea levels, stronger winds and fiercer storms.

Welsh Government is committed to mitigating climate change through a programme of decarbonisation, but we also need to make sure we are resilient and ready to adapt to the impacts of climate change as a result of past, current and future global emissions. Climate change adaptation is a response to global warming which seeks to reduce the vulnerability of our environment, economy and society to offset the effects of any adverse impacts – and to make the most of any changes that may arise.

The need to adapt to climate change is set out in provisions within the Climate Change Act 2008 ('CCA'). The Act states that Welsh Ministers must set out a report on its objectives, action and future priorities on climate change. In addition, the CCA requires that the UK Government publish a Climate Change Risk Assessment (CCRA) to assess the risks to the UK from the current and predicted impacts of climate change. The most recent CCRA showed clearly that more needed to be done in order to adapt to the risks of climate change in Wales, so as a result, Welsh Government committed to publishing a new CCAPW.

There are a number of additional requirements, with regards to climate change adaptation, which are placed upon Welsh Ministers within the CCA. As well as requiring the production of reports, the CCA also provides Welsh Ministers with powers to produce guidance for public bodies on adapting to the impacts of climate change and discretionary powers to require reporting authorities to produce reports on their assessment of the current and predicted impacts of climate change.

Summary of consultation responses

In total, we received 40 responses to the consultation on the draft Climate Change Adaptation Plan for Wales¹. Of these responses, 25 were from organisations and 15 were received from individuals. Organisation responses were received from Local Authorities, 3rd sector organisations, Non-Governmental Organisations (NGOs), Health Boards, Universities, Chartered Institutions, National Park Authorities, Farmers Unions and Natural Resources Wales. The breadth of response ensured all sectors were considered. The analysis provided in this section is disaggregated by each consultation question (questions 2 to 10) for those responses that followed the structure of the consultation questions. Where the response was not provided through the consultation questionnaire, the comments have been included within the summaries listed at question 10 (“Do you have any other comments about this consultation?”). A list of all questions in the consultation is provided at annex 1 at the end of this document.

A large proportion of the responses received provided feedback with regards to decarbonisation (mitigation of climate change) and not adaptation. Where this is the case, feedback was provided to Welsh Government officials working on change mitigation and a summary response to these comments is provided in section B below.

Section A – Responses to the consultation questions

Question 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).

Please explain the reasons for your answer.

This question is given in two parts. The first part asks the respondent to rate the CCAPW. The below chart summarises the result.

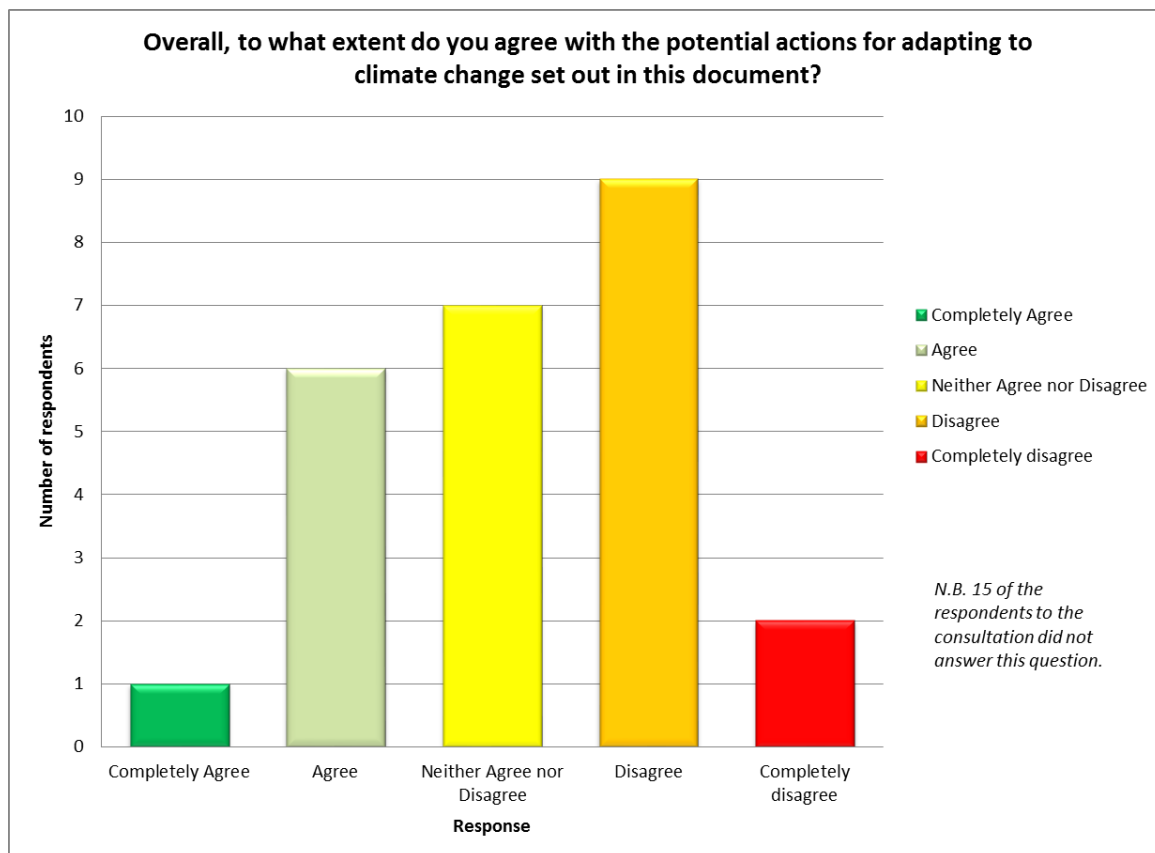


Figure 1 - Responses to question 2 for extent of agreement to adaptation actions.

¹ A further 9 responses were logged, but included no content and have therefore not been included.

When respondents were asked to what extent they agreed with the actions set out in the Climate Change Adaptation Plan for Wales, the most common answer was 'Disagree'. A summary of the reasons given for these scores is given below, split between positive and negative responses.

Positive responses

Some respondents were pleased to see woodlands as a priority asset for carbon storage and sequestration, as well as climate change adaptation. Similarly, some respondents were happy to see infrastructure as a priority area in the plan. Some respondents were encouraged to see the prominence of nature-based solutions as an approach to many climate change adaptation issues running through the text of the draft plan. Positive comments were received with regards to the level of focus on sea and coastal adaptation. One respondent noted the proactive work being done on wildfires, but felt detail was missing in the plan.

Negative responses

Overall, some respondents felt that a sense of urgency is lacking in the plan and that ambitions in the land use sector do not go far enough. One respondent noted that climate change is now too often referred to as a future risk while, in reality, we are already beginning to experience its impacts. Another respondent noted the decision to consider only the more urgent risks (categorised as "more action needed" or "research priority" in the CCRA). However they argued the need to retain focus on sustaining current action to help ensure that the plan links the "here and now" and future action, and recommended therefore, the plan should consider all the risks in UK CCRA2 in order to present a complete, integrated picture.

A number of respondents raised concerns on monitoring and evaluation, noting that indicators and baselines were given as 'to be confirmed' throughout the document and that much more detail is needed on this. Similarly, one respondent noted that governance of the plan was not made clear.

One comment was received asking for the plan to be clearer on what funding is being used to support the actions set out in the plan.

A number of editorial suggestions were made in this section. These included:

- including who is responsible to deliver the actions within the action summary table at annex 1. In addition, clarity is needed on defining 'delivery partners' and 'stakeholders',
- refining the language of the document to make it shorter,
- include a summary version,
- being clearer on how the actions will lead to adaptation to climate change risks, and
- amending references to UKCP09 to the newly published UKCP18² data.

A comment was received asking for the plan to be clearer on the connections and differences between climate change decarbonisation (also known as 'mitigation') and climate change adaptation.

One organisation called for Welsh Government to declare a climate emergency as part of the new Climate Change Adaptation Plan for Wales.

² UK Climate Projections 2019. <https://www.metoffice.gov.uk/research/collaboration/ukcp>

One respondent argued Welsh Government's targets around afforestation were not ambitious and action in this area is currently too slow.

Concerns were raised by one respondent with regards to the role of the planning system, stating the view that the current system is not working. There was a call for developers to pay for enforcement of conditions when they fail to comply with planning restrictions related to climate change. On a similar vein, a call was made to Welsh Government to consider fiscal means, such as taxation, to impact behavioural response to climate change risk.

One respondent felt the pluvial and fluvial flood risks stated in the Climate Change Risk Assessment were not reflected strongly enough in the CCAPW.

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

A large number of comments were received under this section. The comments have therefore been summarised into key policy areas.

Strategy and communication

- Monitoring and evaluation

A significant number of comments were received concerned with the lack of monitoring and evaluation planning within the draft document.

During the consultation process, Welsh Government worked closely with an externally sourced climate change adaptation expert to develop a monitoring and evaluation framework (MEF) to sit alongside the final published version of the plan. The MEF was developed using advice and guidance published by the UK Committee on Climate Change, and will make clear how we intend to measure progress against the plan over the coming years.

- Communication

We received comments asking for clarification on what new communication approaches will be developed to help people understand the risks of climate change and the actions underway to adapt to those risks. A suggestion was also made to establish a citizen's assembly, or adaptation community, to hold Welsh Government accountable for its commitments.

Welsh Government welcomes this feedback and will make suitable amendments to the plan so that our intentions around improved communications are made clear. This may include an improved section in the CCAPW on governance, to establish an external reference group of adaptation experts. More detail in response to comments on communication are handled under question 5, below.

- Adaptation Reporting Power (ARP) and working in the public sector

We received comments asking for stronger statements on how adaptation decision making is made in the public sector. Feedback from the consultation was in favour of reviewing Welsh Government's use of the Adaptation Reporting Power afforded to

Welsh Ministers under the Climate Change Act 2008. We have also been asked to demonstrate the importance of the Future Trends Report³ in decision making.

The above comments will be considered when drafting the final plan.

- Editorial

A number of editorial suggestions were made in the consultation. These included the need to clarify the differences between low and high level actions in each chapter and the importance of demonstrating uncertainty in climate change projections and modelling.

A significant amount of editorial amendments will be put into the final version of the plan. This will include a change to the actions summary tables at the start of each chapter to clarify the actions. We will also review all statistics used in the plan, referring to the UK Climate Projections 2018 (UKCP18) where possible, and ensuring the uncertainty of climate change forecasting is made clear.

- Links with decarbonisation

Some respondents asked for the importance of adaptation for the protection of decarbonisation assets to be made clearer (for example, the need to protect deep-peatlands from drought and mature woodland from damage).

Changes will be considered in the final version of the CCAPW to make these connections clear.

- Funding

Respondents asked for funding for each of the actions in the plan to be made clearer and to explain what funding could be made available for others, with regards to climate change adaptation.

Amendments will be considered in the final version of the plan to show which budgets contribute to climate change adaptation where possible.

- Other comments

A comment was made asking if wildfires were missing from the plan. Some comments were also received advocating greater use of green infrastructure in the plan.

The CCAPW focuses on the 'more urgent' risks given in the Climate Change Risk Assessment (CCRA). The CCRA currently states Wales should 'sustain current action' with regards to those risks relating to wildfires, however, we will review this point for the final version of the plan.

Planning Policy Wales has a requirement for Green Infrastructure Assessments as part of the LDP process to identify and promote such assets.

³ <https://gov.wales/future-trends-2017>

Agriculture, land management and soils

- Natural Resources Policy and Nature Based Solutions

Several comments were received stating the CCAPW should do more to link the importance of Natural Resources Policy (NRP), and in particular Nature Based Solutions, to climate resilience, such as flood management, forestry and the protection of biodiversity.

Amendments will be considered for the final version of the plan so that those actions relating to NRP are more closely aligned with that policy area. This could include a restructuring of the Adaptive Nature and Rural Economy chapter.

- Land management and agriculture

Some consultation respondents called for more content in the plan on sustainable farming methods, including organic farming, permaculture and no till / plough techniques as a means of boosting biodiversity. In addition, a number of respondents called for an end to damaging land managing practices, giving unnecessary tree felling as an example. Support was given by some for the underlying principles of a new Future Land Management Policy and the means to steer policy to promote adaptation. However, conversely, some respondents felt the potential actions listed for agriculture should be rejected as they mostly rely on the proposals that were contained in the Brexit and our Land consultation which they had previously disapproved.

We were asked if research into ditching to retain soils has been undertaken, and have received comments asking for clarity on what the other research needs are within the agriculture sector, arguing that this should be in agriculture support and guidance. We have also been asked to give greater consideration to the importance of agricultural land other than peatland and forestry as an asset to decarbonisation, while also recognising that the concerns around deep-peat maintenance are not just around decarbonisation.

The Minister for Energy, Environment and Rural Affairs made a statement on 4 June on the Brexit and our Land consultation from 2018, which proposed new land management support for Wales. The consultation included proposals to make farm businesses more resilient to support the ongoing production of sustainable food (including resilience to climate change) alongside improved delivery of environmental outcomes such as decarbonisation, improved water and air quality and resilient habitats. It is proposed that the ongoing delivery of environmental outcomes will generate a stable income stream for farmers. This stable income stream will help farmers mitigate volatility. As the consultation process is ongoing it is not yet possible to define what will or will not be included in a future scheme. A further consultation will be published this year before the Royal Welsh Show.

Welsh Government is not aware of research into ditching to retain soils, but this is not to say work has not been completed. Organo-mineral soils are a significant store of soil carbon. Welsh Government is undertaking actions to develop its understanding of the spatial distribution of these important soils. Peat in particular is one of the critical natural environmental resources of Wales. Welsh Government is working with

Natural Resources Wales with respect to promoting the protection and sustainable management of peatlands.

Woodlands and forestry

- Woodlands and forestry

We received a large amount of comments on the role of woodlands and forestry in adapting to climate change in the consultation. Several comments thanked that we recognised the importance of woodland as a carbon store, the issue of ash die back as a climate resilience issue and increased woodland habitat connectivity. However, some respondents asked that we should also recognise the wider range of services woodlands provide in the CCAPW, including cultural importance as well as environmental. Comments also said more reference should be made to the protection of ancient woodlands.

- Forest standards

Similarly, a comment was received asking that we recognise that woodlands can be a source of carbon emissions, particularly where practices leading to the loss of mature trees are considered. Several comments questioned whether the UK Forest Standards (UKFS) was suitable for adapting forestry to climate risk or whether forest design should be determined by the needs from climate change and other benefits. Furthermore, one respondent suggested Welsh Government should promote the use of i-Tree Eco assessments to ensure the valuing and protection of mature trees in urban areas, especially in response to cost saving and developing threats.

- Planting woodland

A number of comments were received with regards to woodland creation, noting we had not set out the type of woodland we intend to use and that the role of native woodlands was not made clear. One respondent called for more trees on farms and there were concerns raised about the use of coniferous plantations also. Finally, a comment was received asking Welsh Government to consider how the siting of wind turbines effects forestry.

Welsh Government very much recognises the many services our trees provide and will improve the CCAPW to reflect this. The protection of ancient woodland is included within the (currently draft) Historic Environment Sector Adaptation Plan⁴. The impacts of woodland and forest use as a source of emissions is covered in various regulations from Tree Preservation Orders to felling licences, and additions under the recent Planning Policy Wales guidance. The UKFS contains specific guidance on adapting to the effects of climate change on forest design and recognises the need for sustainable management in order for woodlands to continue to sequester carbon. It is recognised that there are opportunities for woodland to play a critical role in the adaptation of the effects of climate change through a more integrated approach between woodland and wider land management. Forestry resource policy leads at Welsh Government will make this clearer in the plan. The

4

<https://cadw.gov.wales/docs/cadw/publications/SAP%20Historic%20Environment%20Parts%201%20&%20II%20-%20English%20-%202018-09-14.pdf>

Woodlands for Wales strategy does not commit Welsh Government to promoting i-Tree Eco but does state the effect of its continued use.

Current forestry policy acknowledges that forests need to be multifunctional in order to maximise ecosystem benefits. Plantation softwood forestry provides a renewable material that can substitute carbon-intensive materials, for example in construction, as well as locking away carbon for many decades. It is recognised that conifers are fast growing and lock up carbon faster than broadleaved woodland, while providing a renewable material to the economy. Nevertheless our Natural Resources Policy acknowledges the need for a range of woodland types, including the need for conifer woodlands in the right place. We also acknowledge the need to be clear on the types of woodland we intend to use to meet our plantation aims. This will be improved upon in the CCAPW.

On wind turbines, the planning Technical Advice Note (TAN) 8 indicated the optimum areas for the location of wind farms, with many sites falling on woodland estate. Although trees have been felled to enable this to happen, funds have been retained to ensure that compensatory planting takes place, led by Natural Resources Wales.

Water, flood, coast and seas

- Floodplains

We received a large number of comments with regards to floodplains, particularly in the Adaptive Nature and Rural Economy chapter. We have received calls for the role of floodplains, and impacts of climate change on floodplains, to be considered in carbon storage and sequestration, mitigation of flood and drought, development of agricultural capability maps, and the Future Land Management Programme for Wales.

We also received comments on floodplains in regards to the Safe Homes and Places chapter, specifically for floodplains to be included as a key component of green infrastructure to reduce flood risk and as a key measure to be considered in the update to the Flood and Coastal Erosion Risk Management national strategy.

We agree there is an important role for floodplains in adapting to climate change. Where we have developed actions specifically about particular assets (such as woodland) where floodplains have not been included, this has been because the actions were developed to respond to specific risks from the Climate Change Risk Assessment. However, the structure of the Adaptive Nature and Rural Economy will be changed to be more in line with our Natural Resources Policy, and this will include improving content on the role of floodplains in the CCAPW. We will also consider this need in other policy documentation the plan refers to, such as agricultural capability maps.

Welsh Government will consider amendments to mentions of planning policy (TAN 15 development and the flood plain) in the CCAPW to strengthen Government direction in line with the National Strategy for Flood and Coastal Erosion Risk Management.

- Flood management

A number of comments were made with regards to flood management, particularly the management of grey water and ideas such as encouraging micro-hydro schemes to slow river flow and run off.

One respondent suggested the creation or retrofitting of green roofs as a major opportunity to decrease urban surface water run-off. We acknowledge that green roofs have a role to play in managing surface water drainage as an interception mechanism and as a treatment component in the surface water management train, however, it is for developers and SuDS Approving Bodies (SABs) to assess the most appropriate systems specific to a planned development⁵. With regards to the retrofit of SuDS more generally, whilst we would encourage this we have no plans to introduce it as a requirement at the present time.

- Water quality and sewers

The impact of climate change on water quality was raised in the consultation, stating that proposed measures do not compromise environmental protections and agricultural viability. We were also asked to consider the impacts of climate change and flooding on private sewer systems where waste water discharge could lead to poor water quality elsewhere.

The Cabinet Secretary for Energy, Planning and Rural Affairs announced new water quality regulations due to come into force in 2020 to protect water quality from issues such as waste water discharge. Natural Resources Wales have published guidance to support individual owners in the maintenance of private sewage systems⁶.

Business, economy and infrastructure

- Infrastructure

A comment was received asking Welsh Government to address the increasing demand for road building and consequent habitat destruction. Another comment questioned whether electricity networks should continue to be built using overhead lines instead of being placed underground, to avoid the risks posed from extreme weather and the felling of trees. Furthermore, one respondent highlighted the fragility of renewables in a future climate, arguing that higher wind speeds can reduce the productivity of wind farms (which have to shut off during high winds to avoid damage), increasing the chance of turbine topple and cause blade throw.

Current planning requirements ensure that the development of new infrastructure includes an environmental assessment, and we have been careful to embed climate change adaptation needs into the development of our National Development Framework. We have further recognised the need to move to less impactful means of

⁵ From 7 January 2019, all new developments of more than 1 dwelling house or where the construction area is 100m² or more, require Sustainable Drainage Systems (SuDS) for surface water. SuDS on new developments must be designed and built in accordance with the Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SAB role, before construction work begins.

⁶ <https://naturalresources.wales/permits-and-permissions/water-discharges/register-your-septic-tank-package-sewage-treatment-plant/?lang=en>

transport in 'Prosperity for All: A Low Carbon Wales', which sets out our ambition for modal shift from an overdependence on the car.

It is generally the electricity distribution (rather than the transmission) network which is vulnerable to trees bringing down overhead lines. Distribution networks are underground in urban areas. Undergrounding is not a cost effective solution for the network as a whole. Maintenance costs could be increased by undergrounding as fault finding becomes much more difficult. The incidence of very high wind speeds is unlikely to have a significant impact on productivity of renewable energy as only short term shut downs would be required. However, turbine design will need to evolve to ensure that, as turbines increase in size, they are resilient enough to withstand extreme weather events.

Health

- Air Quality

A number of comments highlighted the important links between air quality, climate change and health in the consultation response, pointing to the environmental impacts of farming emissions such as ammonia implications for public health and biodiversity loss. A call was therefore made to ensure the Climate Change Adaptation Plan for Wales has close integration with other public health policy, such as air quality and noise control.

- Air conditioning

One respondent also asked for alternatives to air conditioning, as a means to combat overheating, to be considered in the plan, arguing that air conditioning can itself be environmentally damaging.

- Public health delivery

One respondent felt that the actions regarding changes to delivery of health and social care fail to address the current pattern of increasing care at home rather than in hospitals and care homes, particularly as transport infrastructure becomes increasingly affected.

Our national strategy, Prosperity for All, sets out Welsh Government's commitment to reducing emissions and delivering vital improvements in air quality through planning, infrastructure, regulation, and health communication measures.

The UK currently meets all EU and international emission reduction commitments. The Welsh Government, in conjunction with UK Government and the other devolved administrations, has published its plans within the UK National Air Pollution Control Programme to help achieve the UK's future emission reduction commitments for 5 important air pollutants, including ammonia and fine particulate matter. The ambitious commitments to be met by 2030 aim to reduce the health impacts of air pollution by half compared with 2005.

Alongside this, the Welsh Government supplemented its existing Code of Good Agricultural Practice (CoGAP) guidance on reducing ammonia losses from agriculture in Wales on 1 April 2019, accounting for the UNECE Framework Code for Good Agricultural Practice for Reducing Ammonia Emissions.

In order to be effective in tackling air pollution and supporting the delivery of our well-being goals, the Welsh Government believes it is essential to take an integrated and cross-Government approach. The Welsh Government intends to consult on a Clean Air Plan this year which will include cross-sector plans and policies to reduce emissions and improve air quality and associated public health and environmental outcomes across Wales. We are also undertaking work in order to produce a Technical Advice Note on Air Quality which will set out the detailed considerations of the Welsh Government's policy with regard to the Planning system.

We are considering the impact of climate change, such as infrastructure disruption, on current models of delivery for health and social care.

Historic Environment

- Cadw

It was noted that the role of Cadw was not explicit in those actions set out for the historic environment and that the connection between the Climate Change Adaptation Plan for Wales and the Historic Environment Sector Adaptation Plan were not made clear. A comment was also received stating climate change research has not been commissioned from the Archaeological Trusts for some years and that the matter of reviewing the vulnerability of historic sites would seem to be ideally suited to a revival of this work. The commenter also noted the draft plan did not mention the Coastal Archaeological Review produced by the Trusts for Cadw.

Cadw is represented on the Historic Environment Group (HEG) Climate Change Subgroup that produced the draft Sector Adaptation Plan (SAP). The Subgroup was closely involved in the development of the Climate Change Adaptation Plan for Wales' (CCAPW) actions and supporting text relating to the historic environment. This includes a section setting out the purpose of the SAP and its role in delivering the high level strategic actions in this plan. The link between the CCAPW and SAP will be clarified and strengthened in the final version. The actions will also be amended.

A full baseline survey of the archaeology of the Welsh coastline was undertaken in the 1990's by the Welsh Archaeological Trusts. The results have been made available through the regional Historic Environment Records, and a review of the evidence was published in a monograph entitled 'The Coastal Archaeology of Wales' in 2002. Recommendations and gaps in evidence highlighted within the report were followed up through a series of detailed thematic surveys undertaken between 2000 and 2005. These included studies of fish weirs, tidal mills, and ports and harbours. Further work was undertaken through the Arfordir programme from 2010, which was a community-based programme of surveys and excavations. The Arfordir programme has been largely discontinued, however there is good potential for continuing with a similar model in order to help manage historic environment aspects of retreating and eroding coastlines, as witnessed by excavations at St Ishmael's and St Patrick's by Dyfed Archaeological Trust.

Biodiversity

- Biodiversity

A comment was received that biodiversity loss and its reversal should be at the heart of the Government's environmental strategy, and that at present, the planning system is failing to deliver the maintenance and enhancement of ecosystems which would support the reversal of biodiversity declines. We also received a call to create ecological networks, to improve connectivity between habitat patches and allow species dispersal – thereby increasing the probability of species surviving.

The reversal of biodiversity loss is already at the heart of our new legislation, including in Part 1 of the Environment (Wales) Act's Sustainable Management of Natural Resources principle and the Section 6 (Resilience of Ecosystems) Duty for public authorities. This is also central to our Natural Resources Policy and a key part of the Well-being of Future Generations (Wales) Act 2015 provisions, linked to the 'Resilient Wales' goal. Planning Policy Wales strongly embeds biodiversity and the abovementioned Section 6 duty for planning decisions, and the recently introduced Statutory Standards for Sustainable Drainage Systems also promote the consideration of biodiversity when designing surface water drainage for new developments.

Planning and Building Regulations

- We received a response arguing that BMV Land (Best and Most Versatile agricultural land) is not adequately protected by planning authorities, arguing that there is a risk to BMV land (ALC Grades 3a, 2 and 1), but especially Grade 3a from proposed developments in Local Development Plans.

National planning policy as set out in planning Policy Wales is very clear that Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC) is the best and most versatile, and should be conserved as a finite resource for the future. It goes on to say that considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.

Planning Policy Wales is a material consideration in the plan making process and we expect LDPs to be developed in accordance with national policies

- A comment was received concerned about the use of the term 'green growth', arguing that a political emphasis on economic growth endangers our climate and discourages honest discussion about the need for adaptation.

Use of the above term will be considered for final version of the plan.

Question 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?

Welsh Government has been encouraged by the many proposals received to collaborate on climate change adaptation in Wales. In response to this question, we also received some very useful examples and case studies of adaptation which we will refer to in our communications work going forward.

Our officials will contact those organisations which have offered individual support to deliver on the actions set out in the draft Climate Change Adaptation Plan for Wales. It was also pointed out in the consultation response that for everyone to get involved, access to resources needs to be made clear. We will therefore also ensure the final version of the plan makes clear how each of our policies is resourced. Some organisations used this opportunity to point out research recently undertaken by others which goes some distance towards filling knowledge gaps on climate change risk.

We recognise an important need to strengthen the way we communicate the risks of climate change and govern the actions in the plan, and we received several offers of support in achieving this. We will consider developing a clearer governance structure in the final version of the plan, which could include a role for an external group to cover communication and governance issues.

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

- Climate emergency

Respondents to the consultation made clear the importance that Government, politicians and civil servants recognise and highlight public concern on the issue of climate change, calling for Wales to declare a climate emergency, supporting those declarations now being considered by some Local Authorities.

Following meetings with UK and Scottish Environmental Ministers, the Minister for Environment, Energy and Rural Affairs has now declared a climate emergency in Wales. We hope the declaration of a climate emergency by Welsh Government can help to trigger a wave of action at home and internationally, from our own communities, businesses and organisations to parliaments and Governments around the world.

- Increasing public knowledge

We have been asked by several respondents in the consultation to ensure that the people of Wales, regardless of ability level or background, understand what contribution they can make, and ensure that they feel that their contribution is making a difference. Several respondents highlighted the strengths of social media to ensure that the momentum behind measures such as recycling and other activities are maintained. This could be in the form of producing info-graphic statistics updating the public at key mile stones encouraging behavioural change leading people to take action. Nevertheless, one respondent noted that while the use of social media in communication of risks and impacts of climate change is encouraging, not all social

media is accessible to some organisations due to security and if social media is used it should direct to one location where all information is available (e.g. Welsh Government dedicated website with all links and guidance included).

We have been asked to communicate by continually publishing an analysis of the risks and likely impacts using all media available, getting the information to trades unions, voluntary organisations and small business groups. It was argued this would encourage people to take what action they can themselves without the need for funding, and making people part of the process. Some further ideas included:

- commissioning evidence reviews of available information on the effectiveness of different climate-change adaptation options;
- a series of town hall meetings, speaking engagements in primary and secondary schools, industry seminars, public and industry forums, etc;
- an active engagement with social, public and industry media. Report on regional risks, plans and ongoing actions;
- build on opportunities provided by the NRW Area Statements and activities by the Public Service Boards, engendering climate change adaptation actions to benefit health inequities and ecosystem resilience;
- engaging with marketing campaigns such as the 'Cymru/Wales' brand to communicate the climate change related sub-benefits of Welsh products such as timber.

We welcome the suggestions made during the consultation. The communications actions in the draft plan will be strengthened and will include specific detail on how we will action a communication plan.

- Summary documents

We have been asked, in the consultation, to produce easy access summary versions of the final plan. We were also asked to continue publishing the Welsh Government Adaptation Newsletter following the publication of the plan.

We intend to produce a number of summary documents of the Climate Change Adaptation Plan for Wales. This will include a main summary version and a separate children and young people's version, to ensure we are able to communicate the plan as widely as possible. We will also continue to publish an adaptation newsletter.

- Communicating the impacts of climate change

We have been asked to communicate the impacts from climate change more clearly with the public and to make clear that impacts are already being felt in terms of more frequent adverse weather events. One comment called for a more pictorial, place-based approach to our communication, as adopted, for example, by the document "Working with a Changing Climate: A guide to adaptation in the Clwydian Range and Dee Valley AONB".

Welsh Government is developing a new version of our current leaflet 'Climate Change: Its Impacts for Wales' to help people learn more about how climate change will affect the country. The leaflet will include analysis of the Met Office's latest climate change data – the UK Climate Projections 2018.

- Planning

We received a comment asking that we make sure each Local Planning Authority (LPA) takes the potential threats of climate change into account on every planning application they receive.

There is a legal requirement for planning applications to be decided in accordance with the Local Development Plan (LDP) unless material circumstances indicate otherwise. Planning Policy Wales is an important material consideration for LDPs - It is for the LPA to determine what evidence is appropriate when making planning decisions.

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

Many respondents provided details of their own external communication platforms to share news and knowledge around climate change adaptation in Wales. This included offers to engage with publications and media work with private, public and third sector organisations.

Other organisations also responded by explaining what they could do to help their staff understand the risks to them both within work and in their lives outside the workplace. Several organisations are already looking to improve their own communications guidance to ensure climate change adaptation is considered in their work and the work of the companies they work with.

Some specific examples include:

- supporting in the provision of evidence and in reviews of available evidence on climate change sensitivity and adaptation options to Welsh Government;
- training the next generation on these issues through teaching and research programmes;
- Attending and utilising Welsh Health Forums for Energy, Waste, ISO14001 and Wellbeing as groups for communication of risks and impacts of climate change from Welsh Government to Health Boards.

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

A small number of comments were received in response to this question.

A good example was given by one organisation on factoring the considerations of climate change into their operations and the on-going need to reduce emissions as a legitimate requirement of their business. For some organisations, it was argued that delivery of the actions in the CCAPW may require more resources (e.g. finance, staff, equipment etc). Managing the environment in a way that restores and then maintains the full range of ecosystem services is likely to be very challenging.

Question 8 - How do you think the potential actions in this plan might affect the following? (public health, communities, Welsh language, equality, children's rights)

Respondents to the consultation gave listed numerous impacts from the CCAPW. These have been broken down into the 5 areas below.

- Under the category of **Public Health**, respondents noted that:
 - generating landscape and city scape change, especially incorporating increases to green space and tree cover, delivers numerous public health benefits.
 - the actions support the reduction of pollution at a community and individual level which is necessary to improving public health.
 - greater control is needed over private sewerage systems in order to maintain public health in rural areas. It is understood NRW is not allowed to advise on the suitability of different non-mains drainage systems, meaning that people often have to make choices about which systems to purchase without the necessary knowledge or independent advice to make that decision.
 - public health will need to be improved with the advent of higher temperatures and possibility of tropical mosquitoes moving north.
 - since climate change impacts are likely to be felt more by deprived communities, with fewer intrinsic resources or capital to adapt, it is important the proposed measures are actually implemented, with more vulnerable communities prioritised.

- Under the category of **Communities**, respondents noted that:
 - facilitating and providing direct support for local action to campaign for and address climate change strengthens and brings communities together.
 - actions HP1 to HP5 promote the role of the planning system which can facilitate building resilience into sustainable development proposals, together with influencing design of developments which will create more resilient communities in terms of the built environment.
 - the cross-cutting theme of communities needs to come through more strongly in the final plan.
 - 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 Welsh 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.

- Under the category of **Welsh Language**, respondents noted that:
 - Improving understanding through effective communication will promote the use of the Welsh language ensuring that everyone understands the potential actions through all material being produced bilingually.
 - The plan should not detract from the Welsh Language.
 - Arguably all adaptation actions create the conditions for the Welsh language to survive and thrive.

- Under the category of **Equality**, respondents noted that:
 - The actions cover a broad area and promote effective communication which should extend to all individuals in Wales. This ensures every individual has an equal opportunity to make the most of their lives and talents and that no one has a poorer life chance because of the way they were born, where they come from, what they believe, or whether they have a disability.
 - Climate change will affect us all and everyone should have a stake in mitigating its impacts. Means tested support for those less able to fund any mitigation should be available.
 - It is widely recognised that those who are 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.

- Under the category of **Children's Rights**, respondents noted that:
 - Children's rights are fundamental in addressing climate change, which threatens the well-being of future generations. This is fundamentally a children's rights issue and should be framed as such.
 - The actions should ensure there is an equal opportunity for all children to live their lives to their full potential through improving resilience to climate change.
 - Children and young people have a right to have everything done to protect their future and the approach of this document is attempting to deliver that.
 - 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.

Question 9 - How do you think the potential actions to adapt to climate change might contribute to achieving the national well-being goals⁷?

Respondents to the consultation agreed positively that clear links were made between the draft Climate Change Adaptation Plan for Wales and the Well-being Goals of the Well-being for Future Generations (Wales) Act 2015. A summary of the comments is given below.

- One respondent argued Wales is the frontrunner on a number of ground-breaking pieces of legislation such as the Wellbeing of Future Generations (Wales) Act 2015, and saw particular links from the draft CCAPW to the goals of 'A Prosperous Wales', 'A Resilient Wales', 'A Healthier Wales' and 'A Globally Responsible Wales'.
- A further respondent welcomed the presence of the Wellbeing of Future Generations (Wales) Act 2015 throughout the consultation and echoed the importance of the well-being goals drawing particular attention to prosperity, resilience, culture and language, equality, and cohesion.
- Another noted, however, that the actions and associated targets are not achievable without clear guidance and assistance for other organisations.

⁷ <https://gov.wales/well-being-wales>

In addition to the above, several suggestions were made to improve how the actions in the plan linked to the national well-being goals.

- One respondent asked for rows to be added to the action tables to illustrate which well-being goals that proposed action will support (with more detail provided in the accompanying text). We were also asked to include a final summary table of all actions and their links with the well-being goals, as an annex.
- Another called for interim progress reports against the actions, risks and impacts of climate change.
- A question was received asking whether the Climate Change Adaptation Plan for Wales should be supported by impact assessments, and whether the plan had been screened under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.

Officials will review the layout of the final plan to see if improvements can be made to the layout of the action tables in each chapter to make clear the links to the wellbeing goals. Being able to monitor the progress and impact of activity outlined in the CCAPW is an important consideration for Welsh Government. Officials are currently working to develop an approach for inclusion in the final draft plan for Ministerial sign off. All statutory impact assessments were completed in the development of the Climate Change Adaptation Plan for Wales.

Question 10 - Do you have any other comments about this consultation?

A large number of comments were received under question 10, and they have therefore been summarised below into the various subject areas similar to question 3. Some comments received under this question have already been summarised and covered under question 3 above and, in such cases, the comments have not been duplicated here for reasons of brevity. Nevertheless, those comments will be treated with equal consideration.

Strategy and communication

- Document design

A number of comments were received asking for the document to include better visual design to ensure the information included is easily navigated. We were also asked to improve Annex 1 of the document to include simpler action numbers (with no abbreviations), names of delivery partners and timescales.

Welsh Government welcomes the feedback on the layout and design features of CCAPW and will endeavour to improve these in the final version of the plan.

- Climate change and weather

A suggestion was made that the emergency response to, and support for recovery from extreme weather events needs to be included within the Climate Change Adaptation Plan.

The Climate Change Adaptation Plan for Wales responds to the risks from climate change as identified in the UK Climate Change Risk Assessment. Immediate responses to extreme weather events are managed within the remit of the Civil Contingencies Act 2004. We do recognise that threats of extreme weather may

worsen and the draft plan included detail on how we will work with Local Resilience Forums to improve emergency response.

Water, flood, coasts and seas

- Water and agriculture

We received a concern that the risk assessment used to inform the plan is missing information on risks associated with irrigation, including drought and low water flow, infrastructure, running costs and impacts on regional water resources. We were asked to make water for food productions a priority, and it was also argued we needed to do more to understand the economic impacts of new investments in irrigation infrastructure on the rural economy.

One respondent felt that a focus on one sector (agriculture) alone is unlikely to deliver the desired water quality improvements now or in the future under the range of climate change scenarios. They also felt that the practical measures that farmers are required to take to prevent or minimise the impacts to freshwater species, due to higher water temperatures and other impacts, must be properly incentivised and fairly rewarded.

Another response noted that while agriculture has a role to play in flood risk management, the future approach must be more coherent and planned to better protect agricultural land, rural communities as well as urban areas. The respondent argued that where farmers provide a service in mitigating flood risk to help protect others, they must be fairly compensated.

The Climate Change Risk Assessment makes clear the impacts of drought and low water supplies on agriculture in Wales. The above suggestions will be considered for the final version of the plan.

The measures outlined in the river basin management plans cover all sectors and we acknowledge that all sectors must contribute towards achieving 100% of water bodies at good status.

- Flood and Coastal Erosion Risk Management (FCERM) National Strategy

We were commended for the inclusion of a proposed revision to the National Strategy for FCERM and inclusion of a new annual reporting mechanism to monitor the progress of Shoreline Management Plans (SMP) actions. However, we were asked to include an assessment of Coastal Groups' (and individual stakeholders therein) capacity to deliver said actions. We also received detailed questions around the use and purpose of the coastal adaptation toolkit and the capacity to implement SMP2 policies.

As the CCAPW must cover many areas, we feel such additions would be too detailed to include in the final version of the plan. However, the comments have been noted and are considered within the new draft National Strategy for consultation.

- Well-being impacts of coastal erosion

One respondent in the consultation felt there is a research need and capacity gap in relation to the mental health and well-being impacts of living in coastal areas subject to future managed realignment or no active intervention. They argued that research

is required to better understand where FCERM governance can be better aligned to health and well-being objectives.

The Welsh Government have undertaken research with Gwynedd on the socio-economic impacts of coastal adaptation. This work is continuing through the Fairbourne Social Risk Project (due for completion 2019).

- Property level adaptation to flood

We received comments that the plan does not do enough to address property level adaptation measures to flood risk and how these might be addressed through governance mechanisms such as risk-reflective pricing in insurance.

The UK Government have committed to the 'Flood Re' insurance scheme to help keep insurance affordable. However, this does not apply to homes built after 2009, to deter inappropriate development, and is intended to be slowly phased out to enable risk-reflective premiums. Whilst we encourage individual property resilience measures and resilient repairs in the forthcoming FCERM National Strategy, how insurers further promote it and reflect in their pricing remains a commercial decision.

- Sustainable Drainage Approving Bodies (SABs)

A respondent to the consultation suggested adding a specific action for monitoring and addressing potential capacity constraints in delivering the responsibilities of SABs, especially in terms of revenue funding for maintaining adopted Sustainable Drainage Systems (SuDSs).

Capacity issues within Local Authorities are being addressed in two ways. Firstly, the Impact Assessment conducted in the development of the policy identified initial start-up costs for establishing SuDS Approving Bodies (SABs) within each Local Authority that could range from £20-50k. In March of 2019 the Local Authorities were awarded grant funding of £20k each to deal with such issues. Secondly, as set out in our statutory guidance, there will be a post implementation review within the first two years which will involve inviting stakeholders, including SABs, so that evidence based changes may be made to the levelling of fees and charges as set out in the legislation.

- Water resource management planning (WRMP)

We were asked to clarify Ministers' role in the WRMP plan approval process as this is an important lever that the Welsh Government can exercise to ensure that Wales is preparing for climate change. We were also asked to consider how best other bodies who abstract water should plan for the future, and how Welsh Government should be involved in approving such plans.

As the CCAPW must cover many areas, this level of detail will be, and is set out in the relevant policy documents to which the CCAPW refers. However, these comments have been noted and will be considered for future policy review by the lead policy division in Welsh Government

- Wastewater management

Some respondents noted the role Drainage and Wastewater Management Plans (DWMPs) will have in climate change adaptation. Some noted there is a debate about whether and when DWMPs should be put onto a statutory footing, mirroring our WRMPs. A suggestion was also made to refer to Dŵr Cymru's "Let's Stop the Block" campaign (regarding the disposal of inappropriate items into the sewer system), which has included TV advertising for example. Furthermore, it was pointed out that Water UK has now launched its "Fine to Flush" standard to identify which products can be safely flushed down toilets.

The status of DWMPs is something Welsh Government is considering and we are engaging with Dŵr Cymru / Welsh Water on this subject. We will consider the recent work done by Dŵr Cymru / Welsh Water and Water UK when developing the final version of the plan.

Agriculture, land management and soils

- Resourcing peatland protections

One respondent urged Welsh Government to provide Natural Resources Wales (NRW) with the necessary support and guidance to deliver peatland restoration as a matter of urgency, to ensure a timely contribution to climate change adaptation.

Welsh Government officials are currently working closely with NRW to improve their approach to peatlands. Peat is one of the critical natural environmental resources of Wales and NRW already promotes the protection and sustainable management of peatlands.

- A comment was received asking to make links with the priority of food security set out in the UNFCCC COP21 Paris Agreement.

Reference to food security and the Paris Agreement will be considered for inclusion in the introduction to the relevant chapter.

Woodlands and forestry

- Woodland creation

We received a comment that poorly planned and inappropriately located woodland creation can negatively impact on priority open habitats and the species they support, and that woodland creation must be guided by the 'right tree in the right place' principle. The respondent also argued that the carbon impacts of woodland creation, particularly commercial forestry, are poorly understood and research is needed to aid full understanding of the ecological opportunities and costs of woodland expansion, at a UK, country and regional level.

There is already a presumption against planting on high value habitat including peatland, and woodland design should take into account these and other factors such as water protection, landscape, historical features and others, in line with the UK Forest Standard and the principles of Sustainable Management of Natural Resources. We have published a woodland creation opportunities map on our 'Lle' web portal that shows the areas where we know that there are significant public benefits from planting trees. We intend to refine the woodland opportunities map so that it shows both the areas where public benefit is greatest, and is clearer about the

kind of planting and the scale of planting that is appropriate in each. NRW's area statements will identify opportunities to deliver our Natural Resources Policy at a regional and place based level, providing evidence for the development of ecological networks and ecosystem service provision to meet more local needs.

- Woodland protection

A respondent pointed out the work done by the LIFE funded Celtic Rainforests project led by Snowdonia National Park Authority, in which RSPB is a partner. The project will bring woodland Special Areas of Conservation into favourable management, address issues with INNS and protect ancient, veteran and heritage trees.

This is a good example of woodland protection in action and officials will consider it as a case study for the final version of the plan.

Biodiversity

- Biodiversity

A respondent stated the draft CCAPW needed to recognise that the baseline is moving and that things in the future will be different because the climate is changing. For example, an increase in biodiversity should not be expected to mean more numbers of the same species or more species which the habitat might be expected to support currently; rather, the species and numbers might be completely different in the future.

Our policy aims to maintain and enhance the resilience of ecosystems at a landscape scale as this will enable nature to better adapt and, overall, should reverse the decline in biodiversity, which we may have to measure differently. Ultimately we may lose species where climatic factors act against them, but we will also gain some - particularly the more mobile species initially.

- Marine ecosystems

A comment was made that action MC2 in the draft plan lacked detail and that more consideration was needed of the range of threats that climate change presents to marine ecosystems. Suggestions to improve the actions were given, including:

- That the marine ecosystems and heritage aspects of the CCAPW-MC2 objective are separated out into two objectives in recognition that the climate-related challenges and associated actions for these two areas differ significantly;
- The objective on marine ecosystems is broadened to include all climate impacts (rather than the magnitude of ocean acidification and higher temperature alone);
- Reviewing stakeholders listed on the action; and
- Increasing emphasis on climate-change impacts on marine ecosystems and the urgent need for further research to address evidence gaps on this.

Action MC2 will be reviewed as a result of this feedback. Action related to marine ecosystems objective will be revisited with relevant stakeholders in this area.

Business, economy and infrastructure

- Stakeholders and delivery partners

We have been asked to include stakeholders such as bus companies to help understand the risks of climate change on transport infrastructure in Wales (action IT1). Similarly, we have been asked to be clear on stakeholders, such as those in the utility sectors, involved in our work to strengthen infrastructure networks (action IT2).

We welcome the feedback and will ensure the list of stakeholders is usefully focused on those who will have a role in the construction or management of transport and utility infrastructure.

Health

- Water fountains

With respect to risks to health and wellbeing from high temperatures, one respondent referred to the importance of access to public water supply in cities, parks, schools, playgrounds, etc., and that easy access to water can help communities become more resilient to heat waves.

Welsh Government agrees there is an important role for public water access to help people stay cool and hydrated in a warmer future. In fact, we are now working with City to Sea and the water companies in Wales to create the first Refill Nation. Increased availability of refill points or water fountains will also help reduce the number of single use plastic bottles ending up in our marine environment disrupting our natural environment. This is vital for delivering sustainability and achieving our well-being goals for Wales.

Historic Environment

- Planning in the historic environment

One respondent asked for greater acknowledgement that the historic environment could contribute far more to adaptation if planning restrictions were relaxed.

New guidance on Managing Change to Listed Places of Worship in Wales⁸ and Cadw's published Conservation Principles make it clear that there is no presumption against change provided that it is well-managed in such a way as to respect the significance of our historic assets. Cadw is supportive of opportunities for energy efficiency and micro-generation measures where proposals are sensitively designed and installed. The Historic Places of Worship Forum provides a mechanism for sharing good practice in this as in other areas in which buildings may need to adapt to meet changing needs.

⁸
https://cadw.gov.wales/docs/cadw/publications/historicenvironment/20181120Managing_Change_Listed_Places_of_Worship-ENG.pdf

- Stakeholders

A number of additional stakeholder suggestions were given for actions related to the historic environment.

The stakeholder lists will be reviewed prior to publishing the final version of the plan.

People and communities

- A comment was received for Welsh Government to consider the role of Natural Resources Wales (NRW) and others in supporting Public Service Boards (PSBs) delivering some of the actions set out in the CCAPW, and for Welsh Government to ensure communities and PSBs are fully aware of the risks posed from climate change.

Environmental well-being is reflected strongly across the work of PSBs. A number of the boards have explicitly identified priorities relating to climate change, and the environment features across all the local well-being plans. NRW are statutory members and actively engaged in all the PSBs, bringing the environmental perspective.

PSBs are also using Welsh Government regional funding to collaborate across borders to combat the impact of climate change. “Climate Resilient Gwent” is an initiative being progressed by the 5 Gwent PSBs, and included community involvement sessions, lived experiences, written stories and case studies and events with stakeholders region wide. This is in order for decision makers to understand solutions which may differ from community to community.

Planning and building regulations

- Local Planning Authorities (LPAs)

One respondent stated they expect planning to have a growing role in the future of adapting to climate change, as increasing pressure is put on our land and buildings. They argued this will require the need for well-developed policies in Local Development Plans (LDPs) and well-resourced Local Planning Authorities in guiding change and use. They also argued that under-resourcing in local planning departments is a key barrier to effective planning for climate change.

A comment was made asking for planning authorities to be removed as stakeholders from action HP2 (design of home and buildings) since planning authorities do not deliver work on building regulations. Separately, we were asked to add Community and Town Councils as stakeholders in action HP4.

Welsh Government agrees that planning will have a growing role in adaptation in the future. Wales has 23 LPAs with an adopted LDP. We are aware that local planning departments have been under resourced for many years and this is an impediment to the realisation of policy. We are working to look at the implications of full cost recovery in the planning system and potentially to allow for planning fees to increase to cover this.

Stakeholder lists for the abovementioned actions will be reviewed in the final version of the plan.

- Agriculture and planning

A comment was received claiming there is an omission from the proposed actions in relation to agricultural resilience and to the land use planning system. They argued that the plan needs to encourage support for the established planning policy that our best agricultural land be protected, with development preferred on brownfield sites and undeveloped land of lower agricultural quality.

Planning Policy Wales (PPW) sets a clear policy framework requiring the re-use of brownfield sites in preference to green-field. The protection of Best and Most Versatile (BMV) land is also set out in PPW.

- Coastal adaptation

On respondent asked that various actions that relate to flooding ought to include a recognition of the role of the planning system and of LDPs in ensuring that new development proposals are consistent with coastal adaptation proposals contained within Shoreline Management Plans. They also asked that the planning Technical Advice Note (TAN) 14 (Coastal Planning) should be updated and referred to in the plan. Another respondent asked that the review of TAN 15 should be considered as a matter of urgency.

Revisions to TAN 15 (Development and Flood Risk) are underway and as part of this TAN 14 will be incorporated. This work will be referred to in the final version of the plan.

- Cavity wall insulation

One comment noted that the current Welsh Government recommendation of cavity wall insulation is known to be linked in areas of high winds and driving rain to dampness and other counter-productive results. As such weather will increase in range and prevalence with climate change, they asked for a review and change of this policy.

Requirements of competent person's schemes dealing with cavity wall insulation have been reviewed and independent assessments of property suitability have been strengthened. Once the reviews of Publicly Available Specification 2030 and 2035 have been completed, lead building regulations policy officials will consider the need for any further changes to building regulations requirements.

Section B – Responses related to decarbonisation

We received a number of comments from respondents to the consultation relating to climate change mitigation (also often called decarbonisation). Since the publication of our consultation draft of the Climate Change Adaptation Plan for Wales, Welsh Government has published *'Prosperity for All: A Low Carbon Wales'*, which sets out our plans to achieve our first set of statutory emission reduction targets. We used responses from our decarbonisation consultation *'Achieving our low-carbon pathway to 2030'* to inform development of *'Prosperity for All: A Low Carbon Wales'*. We will publish our response to that consultation later this year.

Annex 1 - Questions from the Consultation Document

Question 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.

Question 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). Please explain the reasons for your answer.

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

Question 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?

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

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

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

Question 8 - How do you think the potential actions in this plan might affect the following? (public health, communities, Welsh language, equality, children's rights)

Question 9 - How do you think the potential actions to adapt to climate change might contribute to achieving the national well-being goals?

Question 10 - Do you have any other comments about this consultation?