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Dear Michael,



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RE: Draft Built and Archaeological Heritage Sectoral Adaptation Plan

In line with Section 6 and Section 11 of the Climate Action and Low Carbon Development Act 2015 (the Climate Act), it is a function of the Climate Change Advisory Council to provide advice and make recommendations in relation to adaptation policy and Ministers are required to consult with the Council in the preparation of their sectoral adaptation plans.

The Council welcomes the publication of the draft Climate Change Adaptation Sectoral Plan for Built and Archaeological Heritage and believes that the sectoral adaptation planning process offers a valuable opportunity for sectors to build resilience to the impacts of climate change by identifying vulnerabilities, adaptive capacity, risks and opportunities, and developing adaptation plans to address them.

The Council has agreed criteria of assessment for sectoral adaptation plans and the draft Climate Change Adaptation Sectoral Plan for Built and Archaeological Heritage has been considered by the Climate Change Advisory Council and its Adaptation Committee with reference to these.

The Council wishes to outline the following observations on the draft.

General Comments

- There are considerable strengths to this plan including its scope and engagement, as well as some consideration of the potential links to other sectoral plans and local authority strategies. However, further elaboration of the linkages with local authority strategies and their role as planning authorities in particular should be provided. The inclusion of case studies is useful, but these also raise a number of questions related

to the adaptation potential of the sector when compared to the analysis provided elsewhere in the plan.

- The inclusion of a glossary should be considered, as should the use of a schematic or other device to illustrate more complex points – such as those around vulnerability and sensitivity in section 2.1. A statement at the beginning of the plan demonstrating how the Climate Act, National Adaptation Framework and the Sectoral Planning Guidelines for Climate Change Adaptation have been considered would be useful.
- Regarding the categories of adaptation action listed, an adaptation pathway approach can address their limitations and should be explored further.
- Regarding section 5.4.2 it is important to consider that tensions may also arise where actions intersect with other socioeconomic developments (rather than just tourism), especially those that include land use changes.
- The potential for joint monitoring of pests relevant to this plan and the Department of Agriculture, Food and the Marine sectors and biodiversity sector may merit exploration.
- Further information should be provided on potential linkages with the Sustainable Development Goals.

Implementation and Monitoring

- Overall, there is a need to identify responsibilities and resources (human and financial) associated with each objective/action and it is important that interdepartmental coordination and stakeholder engagement are explicitly included. This is essential to contribute to the evaluation of the plan (as per step 6 of the Sectoral Planning Guidelines for Climate Change Adaptation) and how responsibility, delivery and evaluation is assigned and considered in the final plan is key. It is not clear why some actions in the draft 'Implementation & Monitoring Plan' include milestones while others do not.
- Overall, where actions are related to engaging the public/communities to support delivery it is important that training, awareness raising and capacity building requirements are considered. Additionally, further details on plans and targets for these are needed.

Comments on Specific Goals and Objectives

- Regarding Goal 1, Objective 3 (undertake monitoring of climate change and its impacts), greater clarity on the selection and delivery of actions is needed.
- Regarding Goal 2, objective 1 (Integrate heritage issues into relevant national and local inter-sectoral policies and plans), it is critical that opportunities are sought to take advantage of potential synergies and complementarities (where actions within one sector/local authority could also have benefits to this plan) and to identify and collaborate on resolving potential conflicts. How these are to be addressed and prioritised is not clear under this objective.
- Regarding Goal 2, Objective 2 (Mainstream climate change adaptation into sectoral policy and conservation planning at all levels), the actions underneath it should be more specific to show how synergies will be enabled or conflicts eliminated. The training requirements may likely go beyond training in climate change adaptation policy to include practice development and evaluation.
- Regarding Goal 2, Objective 3 (Increase and improve disaster risk management for heritage) the sector could draw further from Disaster Risk Reduction guidance (including 'preparedness' and 'prevention'). The plan should be more specific regarding the focus and timing of the proposed guidelines and training.
- Further detail should be provided on the actions under Goal 3, Objective 1 (Increase the resilience of heritage resources under current conditions) to ensure they are specific, measurable, achievable, relevant and timebound. The interplay, if any, of Urban Heat Islands on built and archaeological heritage may merit further consideration.
- The actions under Goal 3, Objective 2 (Develop management and conservation approaches for changing environments) must be specific, measurable, achievable, relevant and timebound. Any urgent research needs should also be identified here with more information on how research will be taken forward.

- Regarding Goal 3, Objective 3 (Find ways to capture value when loss is inevitable) more information should be provided on how this objective and the associated actions will be progressed.
- Regarding Goal 4, Objective 1 (Create a vision for the sector and demonstrate leadership in the response to climate change challenges) further information on the timing, means and process for developing the required vision should be provided.
- Regarding Goal 4, Objective 2 (Create guidance and disseminate information) the timing for the guidelines and specifically who will lead on their development is unclear.
- Regarding Goal 5, Objective 1 (Explore potential revenue streams and partnerships for the resourcing of goals 1-4) it may be appropriate to consider future engagement with tourism to explore means of investing in the long-term preservation of heritage resources.
- Regarding Goal 5, Objective 3 (Maximise the potential of heritage as an engagement tool for cross-sector research and initiatives, public engagement and education in relation to climate change and adaptation) the potential for synergies resulting from working with other sectors and local authorities in raising public awareness should be explored further.

The Council looks forward to the publication of the final statutory sectoral adaptation plan in the coming months.

Yours sincerely,

Prof. John FitzGerald

Chair

Climate Change Advisory Council

Cc. John O'Neill, Department of Communications, Climate Action and Environment