

London Sustainable Development Commission (LSDC)
Consultation submission on the Draft Climate Change Adaptation Strategy for London,
May 2010

1. Introduction

The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

The LSDC is grateful for the opportunity to comment on the draft Climate Change Adaptation Strategy. As a 'critical friend' to the GLA, the LSDC has an important role in promoting sustainable development in London and advising on the sustainable nature of London wide strategies.

There are many topics covered by the strategy where the drafting has taken forward policies and proposals that the LSDC is able to support. These are referenced in the main body of this paper. There are also some areas for improvement which we have identified in this paper although the Commission does recognise that this is a consultation draft and that it is inevitable that some of the detail will not be there yet. The Commission would therefore be happy to be involved in further iterations of the strategy.

The Commission would particularly like to thank GLA officers for a very helpful presentation explaining the main points of the strategy and being responsive to the Commissioners' questions and points of clarification at their meeting on 28th April.

We would be happy to meet with your team to discuss these comments and issues further and look forward to hearing more about any amendments to the proposals. We would also welcome the opportunity to have a wider discussion with the GLA on how the LSDC may be able to assist in the development of further sustainable options and policies for London on climate change adaptation.

2. Overview

2.1 Introduction

The London Sustainable Development Commission welcomes the publication of the Mayor's draft Climate Change Adaptation Strategy, the first such strategy for a global city. We are encouraged by the lead the Mayor has taken in this adaptation message by considering investment for adaptation measures alongside the actions proposed for mitigation published earlier this year.

Publication of the draft Strategy is recognition of the importance for our future quality of life of adapting to our changing climate. While working to limit climate change by reducing greenhouse gas emissions is a global issue, requiring action around the world, adaptation to inevitable change is a local issue. The adaptations and the activities required depend on local circumstances, and are within our power to make happen.

From the recent conference at the University of Exeter on Dangerous Rates of Climate Change, and from the publication of UKCIP figures, there may be an increasing probability that the UK, Europe and the world may not meet its carbon reduction targets leading to perhaps a 4°C rise in average global temperatures. We therefore need a concerted effort to prepare for a larger change over the next century.

In particular, the exemplars that will be emerging from the London Leaders Programme would be of considerable interest in rolling out programmes for action at local levels.

3. Specific Comments

The LSDC welcomes the draft Strategy, and would like to make the following comments:

3.1 Introduction

We believe that it would be useful for the Strategy to provide, from the outset, a stronger and clear definition of 'adaptation' as compared to 'mitigation' measures.

3.2 Social and Economic Drivers

The draft Strategy is excellent at highlighting the main issues confronting London and in proposing practical policies along with some key actions.

The current document, structured as it is around three main impacts (flooding, drought and overheating), tends to emphasise impacts on the physical environment. It is important that adaptation is not seen as a purely environmental issue. The document could usefully include more on impacts to and implications for people and businesses. Flooding, for example, has the potential to ruin both people's lives and local economies.

We believe that the strategy could benefit from a review similar to the Stern report, but at a London level. This study could be based on the work of the London Climate Change Impact studies that many boroughs are now implementing, and addresses the overall cost of in-action, coupled with the benefits of certain activities.

We welcome in particular the practical advice for people to take some personal action as well as the role of the public sector and others to support London's adaptation. We believe however that the strategy could expand more on how the impacts of climate change can affect different communities, and how these impacts will be measured and monitored. We understand that this will be developed a little more under the *Drain London* project.

The strategy underplays the role of the Mayor and GLA family, such as TfL, in creating exemplars for adaptation to climate change. We would also welcome the opportunity to join you in providing leadership in this area. The LSDC would like to offer elements of its *London Leaders* programme to exemplify good practice on climate change.

3.3 Action Planning

We welcome the commitment to developing and maintaining an action plan. We are pleased that the actions within the strategy are specific and suitably ambitious. However, we would like further clarification on how the actions will be implemented, as these will be key to the success of the strategy.

3.4 Cost benefit analysis

We would like to see more detail on the cost of these actions and particularly where the funding will come from. In order to complete the whole picture and to provide additional incentives to partners, the LSDC would recommend that a whole cost benefit analysis of these activities are conducted. This would support the activities of third parties and the full implications of activities could be realised.

In particular, we believe the Strategy should highlight and emphasise the value-chain that can be derived from a holistic and coordinated approach to adaptation. This can include for example, the benefits to the supply-side gained from positive efforts to make water-use more efficient at the demand side. The investment comparison between demand side direct measures and supply side infrastructure costs need to be reviewed as a whole. This would provide an opportunity to

engage with primary utilities to determine an effective way to pay for demand side measures by offsetting infrastructure costs. This approach can also be applied to slow the flow during heavy rainfall through green roofs. The cost of installing measures such as green roofs will reduce the need for infrastructure upgrades; again indicating a holistic value-chain review would be invaluable. The LSDC would welcome the opportunity to be involved in a peer review of this work, should the GLA proceed with a holistic review.

Potentially a thorough value-chain audit would help identify and therefore measure the benefits through adaptation measures at each of the supply-demand cycle, and allow investment decisions to be made in its totality.

3.5 Green economy

A particular area that the LSDC has specific interest in is what enabling do we need for the market to be ready to take advantage of a green economy. For example, the strategy underplays the enabling role that the LDA will have to make in ensuring that the appropriate goods and services are available for businesses to capitalise on the opportunities that the action plan provides, such as the development of new technologies and innovations to support flood development or overheating. In terms of retrofit to communities, small business may have a successful role to play in developing a community approach to an action plan.

The LDA has a very specific role in supporting smaller businesses, as part of their business support role, to develop their resilience. This may be an area that the *Drain London* Project could explore.

3.6 Water saving and the RE:NEW programme

We welcome the reference to the importance of retrofitting for water efficiency. However, we would recommend that the strategy push harder on water efficiency measures as there are dual benefits for mitigation and adaptation. We support the effort on improving household water efficiency and infrastructure but recommend more action than "encourage" and "enable" (Action 12). This should also be focussed on commercial as well as householder use.

3.7 Links to other strategies

There are some links between Adaptation strategy and other Mayoral strategies that are not made explicitly, particularly with the London Plan in establishing the appropriate guidelines for new construction as well as retrofit. In addition there should be recognition of the role that the London Plan should play in supporting sound infrastructure planning, and that sustainable development can play in adaptation.

4. Comments on particular actions

4.1 Actions 1-4: We support the development of improved flood risk mapping and a more targeted approach to the collation and sharing of data.

4.2 Action 14: A London-specific drought plan should build on existing water company and Environment Agency drought plans.

4.3 Actions 17-20: We welcome the use of green infrastructure to adapt to climate change by managing increasing temperatures and improving rates, volumes and quality of surface water runoff.

4.4 The LSDC recommend that Action 28 in particular addresses the issues of health inequalities and specifically identifies those who are at the most risk of being disproportionately affected by climate change: in particular, those that are house bound, and so could not move to a cooler location such as a park; and those who cannot afford the appropriate flood insurance. In order to address this, it would be important to begin to identify those most vulnerable and have an indicator or mechanism that would identify

that they are being appropriately supported. An example of this would be to include thermal comfort (overheating as part of the LAA NI set) for decent homes, or homes that are not appropriately insured against a flood event.

4.5 Action 30: We welcome the recognition of ecosystem services as a means of adapting to climate change and providing wider sustainability benefits.