

LSDC Secretariat  
City Hall  
The Queen's Walk  
London  
SE1 2AA

020 7983 6519

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Alex Nickson  
Strategy Manager - Climate Change Adaptation and Water  
Greater London Authority  
City Hall  
More London  
The Queen's Walk  
London SE1 2AA

Dear Alex,

### **Draft Climate Change Adaptation Strategy – August 2008**

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.

#### **Overview**

This is a welcome piece of work, which takes seriously the complexity of sustainable development. We note that this strategy is both a major communication opportunity (bringing climate change close to home) and a major challenge (simple communication of complex issues). We would encourage the use of this strategy as a tool to gain the attention of decision makers in London, and to increase their understanding and commitment to action both in the abatement of and the adaptation to climate change.

The immense sweep of the strategy puts into perspective the difficulties London experiences dealing with relatively minor disruptions to its daily pattern of life. Whilst the scale of the challenge is clear, however, we feel that the urgency of action, and the pivotal role of the Mayor in terms of planning for climate change, could be more strongly addressed.

Whilst it would be misleading and unhelpful to suggest that climate change will not affect everybody, we are supportive of the care taken through much of the draft Strategy to include the likely unequal impacts of climate change. This is especially true of the flooding and health chapters. We would however welcome more clarity on how the Mayor will use his planning powers to ensure that the more vulnerable

members of London's community do not suffer disproportionately from the effects of climate change.

## **Specific Comments**

### ***Introduction***

The 'prevent-prepare-respond-recover' approach is presented as a 'series' of actions on p xii – the narrative in different parts of the strategy make it clear that this is not supposed to be a sequential hierarchy of action. That might be clarified, for example by a cyclical rather than a hierarchical representation.

### ***Chapter 2 Flooding***

The 'priority actions' are slightly differently described and ordered at p 11, p 26 (if indeed 'policy 1' contains priority actions) and the summary document (p 20). Is this deliberate or significant? (The same point applies to some other chapters.) The priority issues do not explicitly refer to recovery (possibly implicit in reference to Flood Response Plan), although recovery is said to be an issue that is 'usually overlooked, or underestimated' (p 25). Recovery also highlights the uneven impact of flooding. And similarly, the particular scale of the re-housing (people and services) challenge for London (compared with other parts of the country) is less clear from the Strategy than from the presentation on 26 September.

Presumably addressing the low take up of insurance from those living in social housing is not a *simple* matter of 'encouragement'? (p 27)

### ***Chapter 3 Drought***

There are opportunities here for a neater integration of environmental considerations. The likely impact of drought on the environment is explicitly raised, but the potential for responses to drought to exacerbate environmental harms is only implicit, by contrast to the explicit reference to sustainable responses in the heat chapter (p 55, p 57).

Summary document, p 15 – 'only 20% of Londoners have an incentive to save water'. Rather than give the impression that water metering is the only way to incentivise water saving, better might be 'only 20% of Londoners have a *financial* incentive to save water'.

Table 3.1 – this statistic about water availability is often used but is possibly misleading. Comparing a particularly heavily populated and dry part of a country (the Thames region) with entire countries (Spain, Greece and Morocco) is a fair comparison only on the assumption that water is evenly distributed in those countries. Is that the case, or do sparsely populated mountain regions receive most rainfall? How would the Thames region compare with Madrid, Marrakesh or Athens? We acknowledge that this comparison is very powerful – but it would be counterproductive in the long term to use inappropriate comparisons. It would help for use of such comparisons to be followed by explanation.

### ***Chapter 4 Overheating***

P46 refers to death and negative impacts on the economy and education, but not to general health and well-being.

The contribution of increased density to the urban heat island effect is presented on p 51 as inevitable, but from reading on appears to be something that can and should be managed.

### ***Chapter 6 London's environment***

This chapter contains a welcome combined discussion of what the environment can do for us, and what we should be doing for the environment for its own benefit and so that we can continue to gain from 'eco- system services' provided by our environment.

This approach emphasises that existing good practice and ambitions become more urgent, and of more immediate human interest, in a time of climate change. The current attention paid to climate change often seems to distract attention from environmental concerns that are not obviously 'about' climate change. Climate change should more properly *emphasise* the importance of a more holistic and broad ranging approach to environmental issues. This is implicit in the approach taken in this chapter, and might be more clearly brought out.

Use of green spaces for renewable energy (p 80) is not in all cases an automatic environmental gain. All green spaces are not the same and the use of green spaces of high biodiversity value for these functions has proved itself to be at best controversial in environmental terms.

There is no discussion in this chapter of environmental inequalities in London.

### ***Chapter 7 London's economy***

London is clearly vulnerable to the impacts of climate change through the global economy. This is not though just an issue for 'London's economy'. The potential global impact of climate change on imports (especially of food – the reference to local food production on p71 is a little vague), migration and possibly also tourism are absent from the report. Whilst the Mayor has limited capacity to directly influence global adaptation and decision making, this is in part simply a question of ensuring London's resilience – just as for floods and heat waves. It is also a question of acknowledging the greater impact of climate change in certain vulnerable developing countries. Helping other countries to adapt is both a matter of justice, given unequal contributions to climate change and unequal adaptation capacities, and a matter of self interest in an inter-connected world.

This chapter concentrates on financial services. Various chapters discuss public services, but the discussion of other private sector business, including small businesses, appears to be something of an afterthought in this chapter. The position of employees is also underplayed (although mentioned in the flooding chapter); short or longer term disruption of employment is likely to have a disproportionate impact on the lower paid and least resilient.

Query robustness of data in table 7.1.

The discussion of continuity management raises the same question as the discussion of insurance in respect of social housing tenants (above). Presumably the more marginal the business, the more it is vulnerable to climate change and the less likely it is to devote scarce resources to planning.

***Chapter 8 Infrastructure***

Has non-transport communications infrastructure been considered as potentially affected by climate change?

*Transport*

The useful point about the sustainability of air conditioning that is made in the chapter 4 is not picked up again here.

We would be happy to meet with you to discuss these comments 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 Climate Change Adaptation options and policies for London.

Yours sincerely,

Maria Lee

*Commissioner*

*On behalf of The London Sustainable Development Commission*