

RESPONSE TO THE LONDON ASSEMBLY'S COMMENTS ON THE DRAFT CLIMATE CHANGE ADAPTATION STRATEGY

The Mayor thanks the London Assembly's Environment Committee and Planning and Housing Committee members for their comments on the London Assembly and Functional Bodies' Draft of the Adaptation Strategy (LAFBD).

This is the Mayor's statutory report to the Chair of the London Assembly in accordance with section 42A of the Greater London Authority Act 1999 following earlier consultation with the Assembly on the LAFBD. The Mayor sets out below how the Public Consultation Draft (PCD) has addressed the Assembly's comments (the Assembly's comments are appended) by identifying which of its comments are accepted for implementation in the strategy, and those which are not, with reasons.

1. Implementation

Comment: The Assembly recommends that the strategy should provide more detail on how the proposed actions will be delivered to ensure effective implementation.

Response: The draft CCAS contains an Action Plan (Chapter 10), which collates all the actions proposed in the strategy into a single table, and for each action sets out who will lead on the delivery of the action, which organisations will support the delivery of the action and when the action will be implemented by.

All delivery partners have been approached regarding the proposed actions and GLA officers have had at least initial discussions regarding the actions, however, part of the purpose of the consultation is to refine the actions so that the final strategy will contain a fully detailed and agreed action plan.

2. Strengthening linkages to other strategies

Comment: The Assembly recommended that the strategy should provide clearer cross-references to other Mayoral strategies, most particularly with the Climate Change Mitigation and Energy Strategy (CCMES) and underline the synergies between adaptation and mitigation.

Response: The strategy's introduction places special emphasis that adaptation and mitigation should be understood within the wider context of sustainable development to avoid unsustainable approaches. The draft CCAS underlines the synergies with climate change mitigation and the CCMES, as well as where carbon reduction measures may be counter productive in adapting London. References to other Mayoral strategies, (particularly the Draft Replacement London Plan) have also been updated and reinforced in the draft CCAS. Actions in the strategy include the Home Energy Efficiency Programme, which will help London homeowners save water, energy, carbon and money through an integrated home retrofit (the Mayor will work with partners through the CCMES to establish financing mechanisms for the roll-out of more expensive measures on a large scale by 2015, such as solid wall insulation and renewable technologies, as part of the whole-house approach when retrofitting London's homes).

3. Increasing London's adaptive capacity

Comment: The Assembly recommends that the strategy needs to increase London's adaptive capacity to respond to extreme weather events and climate-related economic shocks.

Response : Both the LAFBD and draft CCAS assessed and commented on how sufficient adaptive capacity is integral to successful adaptation. Many of the actions are directed at improving our adaptive capacity.

4. Flooding

Comment: The strategy must be explicit on how the most up to date data and research will feed into the strategy, to keep change with regularly changing climate scenarios."

Response: The introduction to the draft CCAS states that the strategy will be kept under review and any one of a number of issues, such as the publication of new climate projections, or sea-level rise scenarios, may trigger the update of the strategy.

Comment: The Assembly requested further clarity on how the Mayor will work with Londoners to raise public awareness and capacity to act to flooding and flood risk management.

Response: The draft CCAS proposes two new actions to raise public awareness and build community / individual capacity to act. The first action involves the Mayor working with the Environment Agency to help disseminate the new flood codes when they are launched by the Environment Agency in spring 2010. This will also involve increasing the number of people at flood risk signing up to FloodLine Warning Direct. The second action involves working with two communities at significant surface water flood risk to develop community surface water management plans that sit within the Borough Multi-Agency Flood Plan. These will be funded by the Drain London Project and the lessons learnt from these will be applied across London and to managing other risks, e.g. heatwaves.

The Mayor is also developing a bespoke consultation website to accompany the strategy. The website will ask Londoners what they, as individuals or communities, could and would do to prepare for floods, droughts and heatwaves. The purpose of the website is to emphasise that the public need to work with the Mayor to help London adapt, and to start a discussion with them on what they could do. It is hoped that this will raise awareness, encourage ownership of the risks and provide an insight on what people would be prepared to do.

5. Drought

Comment: The Assembly requested further information on how the Mayor will work with the London Resilience Forum and the water companies to review contingency measures for an extreme drought, and how the Mayor will work with London Resilience on flooding and overheating.

Response: The Mayor and the London Resilience Partnership (LRP) believe that the risk of major drought in the short to medium term is not a significant risk for London. The Mayor believes however, that the need to reduce our abstraction of water, coupled with the rising demand from our growing population means that the need for a London

Drought Plan should be kept under review and recommends in the draft CCAS that the LRP should be responsible for this.

On overheating, the London Resilience Partnership is planning to start work on a London Regional Heatwave Plan this Autumn (2010). As with all of the regional heatwave plans, this will be produced on a multi-agency basis and will serve as a direct translation of the National Heatwave Plan. The Mayor will work with the LRP through providing information on London's urban heat island effect and has recommended that the LRP should also look into the provision of heatwave refuges.

On flooding, the Mayor has been working with the LRP on the Multi-Agency Flood Plan Task and Finish Group. In the future the Mayor will encourage the LRP to use the outputs of the Drain London project to identify and prioritise surface water flood risk and flood risk management measures.

Comment: The Assembly has requested further detail on how the Mayor will work with the four water companies, the LDA and the LCCP to promote and facilitate the retrofitting of existing homes to be more water efficient.

Response: The Mayor believes that water efficiency should be considered and promoted within the Home Energy Efficiency Project (HEEP) and has worked over the period since the LAFBD to integrate it into the HEEP. As the water companies have a voluntary water efficiency target, the Mayor has involved the water companies in the HEEP pilots and will involve the water companies in the roll out of the HEEP later in 2010. The Mayor is actively continuing discussions with OfWat and Thames Water on domestic water efficiency and Thames Water's participation in HEEP.

Comment: The Assembly have recommended that the Action Plan should set how the Mayor will work with water companies to encourage and enable increased water metering.

Response: Since the publication of the LAFBD, the Mayor has published the draft Water Strategy for public consultation. In the draft Water Strategy, the Mayor further argues that water metering is an essential element towards balancing London's supply and demand balance. The draft CCAS proposes undertaking research into 'water neutrality' to identify the scale of actions required to maintain, or even reduce London's future water needs compared to today, despite a growing population and a changing climate. The Mayor is involved in ongoing discussions with Thames Water and OfWat and will submit evidence to the public enquiry into Thames Water's Water Resource Management Plan.

6. Overheating

Comment: The Assembly welcomed the urban greening programme but stated that it wished to see the Action Plan contain a mechanism or methodology to measure the impact of the urban greening programme on London.

Response: The Mayor is working with the LUCID¹ and SCORCHIO² projects to understand the relative benefits of various urban heat island management strategies

¹ The Development of a Local Urban Climate Model and its Application to the Intelligent Design of Cities (LUCID) <http://www.lucid-project.org.uk/>

(for example, urban greening, increasing the albedo etc) to keeping London cool in hot weather. Both these projects are expected to report during 2010. However as both projects rely on modelling London's microclimate, the Mayor is also calling for the Met Office to undertake a feasibility study into creating and maintaining a network of weather stations across London to improve our understanding of London's microclimate and the impact of urban greening measures on managing temperatures.

Comment: The Assembly believes that the proposed SPG on Sustainable Design and Construction should contain specific measures to minimise heat generation, as the first step in the 'cooling hierarchy'.

Response: The SPG on Sustainable Design and Construction is expected to be published following the Examination in Public of the London Plan. As both the energy hierarchy and the cooling hierarchy start with energy efficiency, the Mayor will develop guidance in the SPG on energy efficiency measures to reduce the contribution of energy use in buildings to overheating.

7. Planning

Comment: Assembly members wish to see future revisions of the London Plan retain, and where possible, strengthen policies on both the mitigation of, and adaptation to climate change.

Response: The consultation draft replacement London Plan (October 2009) contains significant new policies on mitigation and adaptation, together with extensive cross-references. Cross references with London Plan policies are also made in the draft CCAS.

² Sustainable Cities: Options for Responding to Climate cHange Impacts and Outcomes (SCORCHIO)
<http://www.sed.manchester.ac.uk/research/cure/research/scorchio/>

Appendix 1 : London Assembly's comments on the draft London Climate Change Adaptation Strategy :

The Environment Committee welcomes the opportunity to respond to the Mayor's consultation of the draft climate change adaptation strategy.

The Committee held a public meeting on 15 October 2008 to review the draft strategy with a panel of witnesses from the Association of British Insurers, City of London and GLA Environment and Planning officers.

Members of the Planning and Housing Committee also attended, as planning will be an integral part in the delivery of the strategy. A copy of the transcript will be made available at the following web page:

<http://www.london.gov.uk/assembly/envmtgs/index.jsp#76>. Other Assembly committees are expected to consider elements of the draft strategy in the coming months, for example, the Transport Committee will be advised of relevant elements of the strategy when it considers the Mayor's draft Transport Strategy.

The Committee welcomes the publication of the draft strategy and the Mayor's commitment to tackle climate change. Members would also like to recognise the important work on climate change adaptation from the London Climate Change Partnership. The Committee wishes to work with the Mayor to better equip the city to cope with the changes wrought by climate change. The Committee understands that the next step will be the production of a more detailed action plan. Members welcome this.

The Committee would like confirmation that the Mayor will consult the Assembly on this action plan, in the same way as the draft CCAS.

The focus of this response is how the Mayor intends to move from aspirations to implementation and for the provision of more details in terms of how the strategy will be delivered, who will be responsible for what and specific timelines for delivery.

The Committee's response is set out below and includes both general and specific points.

General points

1. Implementation

1.1 Key to the success of the Mayor's Climate Change Adaptation Strategy will be **effective implementation**. In order to be credible, the Committee believes that the proposed action plan must contain the following elements:

- A systematic account of how the Mayor will achieve his objectives as set out in the policy proposals and key actions;
- A clear implementation timetable – the Committee would welcome detail of significant milestones that the Mayor is committed to meet over the short and medium term;
- Recognition of the importance of stakeholder engagement to ensure successful follow through of the strategy and therefore a clear framework as to how partnerships are to be developed and resourced;

- Greater clarity as to who will be responsible for implementation and how the Mayor will manage these relationships;
- Adaptation policies are key to reducing risks from flooding, drought and overheating. However, to be successful, immediate action is essential and this urgency should not be underestimated. The Committee would like short term priorities to be stated in the action plan.

2. Strengthen linkages to other strategies

2.1 The Committee would welcome more clarity on where points in the strategy link to other Mayoral strategies (e.g. housing, economic development, the London Plan). Members would wish to see all future strategies contain an explicit consideration of, and justification for, policies and practices designed to mitigate and adapt to climate change. This will be important in sending the clear message that tackling the effects of climate change is a cross cutting theme that will run through all Mayoral strategies.

2.2 The Committee would welcome the Mayor's comments on whether linkages between adaptation and mitigation of climate change will be addressed, either in the action plan or the forthcoming Climate Change Mitigation and Energy strategy. **It was recognised in the Committee meeting that there are important synergies to make and adaptation and mitigation should be developed jointly, yet this is not reflected in the adaptation strategy; any future draft must make these linkages explicit.**

2.3 In addition, there are also potential conflicts between adaptation and mitigation policies, for example the increased use of air conditioning (as an adaptation method) or designing buildings with high thermal efficiency but poor ventilation. These conflicts are the subject of a wide ranging review by a European research project, ADAM (Adaptation and Mitigation Strategies: supporting European climate policy), that will lead to a better understanding of the trade-offs and conflicts that exist between adaptation and mitigation policies³. The Tyndall Centre for climate research have also published findings on integrating adaptation and mitigation into climate policy.⁴ **A future draft of the CCAS should reflect these findings to avoid costly policy reversals in the future. Flexibility**

3.1 The Committee recognises that a degree of uncertainty over London's long-term climate is inevitable. However, uncertainty is no excuse for inaction. There is therefore **a need to increase London's 'adaptive capacity'** to a range of possible future climates, and improve overall resilience to both extreme weather events and climate-related economic shocks. **Members would welcome this being examined in further detail in any future draft of the CCAS.**

³ <http://www.adamproject.eu/>

⁴ http://www.tyndall.ac.uk/publications/working_papers/wp40.pdf

Specific points

4. Flooding

- 4.1 The strategy states London is vulnerable to flooding with nearly 15 per cent of London at risk from tidal and fluvial flooding⁵. Therefore, the Committee welcomes the proposal to “*improve the standard of flood risk management on London’s rivers*”⁶, and “*to improve the standard of flood defence where necessary*”⁷. In light of recent Met Office research for the Environment Agency Thames Estuary 2100 Project, a 40 per cent increase in peak fluvial flows on the Thames and its tributaries by 2080 has been forecast⁸. **It must be made explicit how the most up-to-date data and research will feed into the strategy, to keep up with regularly changing climate scenarios.**
- 4.2 The Committee would like to note the importance of encouraging individuals, households and businesses to make necessary changes to combat flood risk. We welcome the commitment from the Mayor that he will seek to “*raise public awareness and capacity to act to flooding and flood risk management*”⁹, given that during the Committee meeting it was agreed that economic incentives do not always work. **It is unclear from the CCAS how this might be achieved; whether the Mayor will rely on partnerships to deliver this message or whether he will commit GLA resources to this task. The Action Plan must address this issue. This point equally applies to drought and overheating.**

5. Drought

- 5.1 The importance of action to manage drought risk was underlined during the Committee meeting. Members would like to know when and how “*the Mayor will work with London Resilience Forum and the water companies to review the contingency measures for an extreme drought*”¹⁰. The Committee would welcome further detail in the Action Plan. In addition, **Members would also like more detail on how the Mayor will work with the London Resilience Forum on flooding and overheating.**
- 5.2 The Committee welcomes the actions proposed to manage drought risk. The Committee would find it helpful to obtain more detail on how the Mayor will work with “*the four water companies supplying London, the LDA and the London Climate Change partnership to promote and facilitate the retrofitting of existing homes to be more water efficient*”¹¹ Will this become a policy in the action plan? In addition, it is vital to include London boroughs in this process.
- 5.3 As discussed at the Committee meeting, a critical aspect of managing drought risk is through the introduction of water metering. Members welcome the inclusion of the key action to “*promote and encourage compulsory water*

⁵ page 11, draft Climate Change Adaptation Strategy

⁶ Key action, page 11, draft Climate Change Adaptation Strategy

⁷ Policy 1, page 26 draft Climate Change Adaptation Strategy

⁸ <http://www.metoffice.gov.uk/corporate/pressoffice/2008/pr20080923.html>

⁹ Policy 1, page 26 draft Climate Change Adaptation Strategy

¹⁰ page 40, Respond section, draft Climate Change Adaptation Strategy

¹¹ page 40, Prepare section, draft Climate Change Adaptation Strategy

*metering in all developments where feasible*¹². **The action plan should set out what the Mayor will add to the on-going work that the water companies are already doing in this area.**

6. Overheating

- 6.1 It was noted during the Committee meeting that this is the most complex area to tackle, as it is a subject where there is the least shared understanding. The Committee believes that if the Action Plan is to be credible in this area then research drawing on the experience of other cities could help support policy development to prevent overheating in London. Chicago was cited as an example during the Committee meeting.
- 6.2 Significant emphasis is placed on the urban greening programme as a means to reduce overheating in London. **The Committee welcomes this but would wish the Action Plan to contain a mechanism or methodology to measure the impact of the urban greening programme on overheating in London.**
- 6.3 The Committee discussed the generation of heat in offices from lighting and computers and the effect this has on the “urban heat island” effect. As outlined in policy 3, the Mayor believes developers should use the cooling hierarchy as guidance for reducing the need for cooling, including “*minimise the internal waste heat generation (energy efficiency)*”¹³. **The proposed supplementary planning guidance on Sustainable design and construction should contain specific measures to minimise this heat generation.**
- 6.4 The Committee would like to conclude that owing to overheating being an especially pertinent issue for London, as the largest city in the UK, the Committee is considering looking at carrying out further work in this area, and that further engagement with the Mayor on this issue would be productive.

7. Planning

- 7.1 As was stated during the Committee meeting, planning is one of the most important levers for delivering the measures proposed in the CCAS. Effective spatial planning has the potential to limit and mitigate the effects of climate change processes, by promoting spatial distributions of new land uses and development that cap or reduce the emission of greenhouse gases.
- 7.2 The Assembly welcomes the Mayor’s intention to keep climate change as one of the five key themes in his approach to spatial planning and in particular his statement that “London’s environment must improve and we must step up our efforts to tackle climate change”¹⁴.
- 7.3 Whilst the last review of the London Plan, published February 2008, recognised adaptation, it concentrated on action to mitigate and abate the effects of climate change (three quarters of the new policies focussed on action to mitigate and abate the effects of climate change). **Members would wish to**

¹² page 29, draft Climate Change Adaptation Strategy

¹³ page 62, draft Climate Change Adaptation Strategy

¹⁴ “Planning for a better London”, July 2008

see any future revisions to the London Plan retain and, where possible, strengthen policies on both the mitigation of and adaptation to climate change.

- 7.4 It should be noted that specific policies with direct reference to the London Plan, should be cross-referenced. Examples include:
- actions and policies directed towards developers concerning the Urban Heat Island¹⁵ in the overheating chapter;
 - using reclaimed water in major new developments¹⁶ in the drought chapter;
 - surface water management¹⁷ in the flooding chapter.

The Committee looks forward to your response and would like to take this opportunity to thank the Mayor's Environment and Planning team, the Association of British Insurers and the City of London Corporation for their assistance in compiling this response.

¹⁵ pages 41 and 62, draft Climate Change Adaptation Strategy

¹⁶ page 38, draft Climate Change Adaptation Strategy

¹⁷ page 26, draft Climate Change Adaptation Strategy