

Mr Boris Johnson,  
Mayor of London,  
City Hall,  
The Queens Walk,  
London,  
SE1 2AA

**Our ref:**  
**Date:** 31 October 2008

Dear Mayor,

**The Environment Committee's response to the Mayor's draft Climate Change Adaptation Strategy (CCAS).**

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 policies<sup>1</sup>. The Tyndall Centre for climate research have also published findings on integrating adaptation and mitigation into climate

---

<sup>1</sup> <http://www.adamproject.eu/>

policy.<sup>2</sup> **A future draft of the CCAS should reflect these findings to avoid costly policy reversals in the future.**

### 3. 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.**

### 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 flooding<sup>3</sup>. Therefore, the Committee welcomes the proposal to *"improve the standard of flood risk management on London's rivers"*<sup>4</sup>, and *"to improve the standard of flood defence where necessary"*<sup>5</sup>. 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 forecast<sup>6</sup>. **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"*<sup>7</sup>, 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"*<sup>8</sup>. 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.**

---

<sup>2</sup> [http://www.tyndall.ac.uk/publications/working\\_papers/wp40.pdf](http://www.tyndall.ac.uk/publications/working_papers/wp40.pdf)

<sup>3</sup> page 11, draft Climate Change Adaptation Strategy

<sup>4</sup> Key action, page 11, draft Climate Change Adaptation Strategy

<sup>5</sup> Policy 1, page 26 draft Climate Change Adaptation Strategy

<sup>6</sup> <http://www.metoffice.gov.uk/corporate/pressoffice/2008/pr20080923.html>

<sup>7</sup> Policy 1, page 26 draft Climate Change Adaptation Strategy

<sup>8</sup> page 40, Respond section, draft Climate Change Adaptation Strategy

- 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”<sup>9</sup> 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 metering in all developments where feasible”<sup>10</sup>. **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)”<sup>11</sup>. **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.

---

<sup>9</sup> page 40, Prepare section, draft Climate Change Adaptation Strategy

<sup>10</sup> page 29, draft Climate Change Adaptation Strategy

<sup>11</sup> page 62, draft Climate Change Adaptation Strategy

- 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"<sup>12</sup>.
- 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 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 Island<sup>13</sup> in the overheating chapter;
  - using reclaimed water in major new developments<sup>14</sup> in the drought chapter;
  - surface water management<sup>15</sup> 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.

Yours sincerely,



Darren Johnson AM  
**Chair of the Environment Committee**

cc Jennette Arnold, Chair of London Assembly  
Isabel Dedring, Director of Environmental Policy  
Alex Nickson, Strategy Manager

---

<sup>12</sup> "Planning for a better London", July 2008

<sup>13</sup> pages 41 and 62, draft Climate Change Adaptation Strategy

<sup>14</sup> page 38, draft Climate Change Adaptation Strategy

<sup>15</sup> page 26, draft Climate Change Adaptation Strategy