

LOCAL GOVERNMENT NATIONAL INDICATOR SET TECHNICAL HANDBOOK - RESPONSE TO CONSULTATION DOCUMENT

Name and address of responding organisation:
Devon County Council

Is this your organisation's official response to the consultation? Yes

Name and phone number of key contact in case of follow-up queries:
Ian Bateman 01392 383390

National Indicator Number:

186

Please complete a separate form for each indicator on which you wish to respond

Indicator Issue	
1. Is the Technical Definition of this indicator clear?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If NO a. What aspects of the technical definition of the indicator are unclear? Please specify clearly - is it in relation to the measurement method, or - on reporting b. Please suggest how the template can be clarified/improved.	The title of the indicator is per capita reduction yet the measurement is expressed in terms of % to no decimal places. Given that all the verbiage is for the benefit of Defra who both own the data and are the reporting organisation, much of it is totally unnecessary.
2. Does the Technical Definition for this indicator have any unintended consequences?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If YES a. What are the unintended consequences on this national indicator? b. Can the unintended consequence be avoided? If so, how?	See coments in para 6 below on timing of data and performance assessment.
3. Will the Technical Definitions for this indicator work in practice?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

<p>If NO</p> <p>a. Why would this technical definition not work in practice?</p>	<p>The indicator will not work as LAs do not have the instruments to effect change by the magnitude expected. All the climate change instruments are held by central government and this indicator will only reflect the impact of central government policy at a local level. What is the expectation that planning and the local transport plan will have on overall emission in a 3 year period?</p>
<p>4. Is this indicator defined at the right spatial level?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>a) If not, what level should it be defined at? (including whether information is already gathered and/or reported at that level and if so where, if not, estimated cost of collecting and reporting it)</p>	<p>There is the potential complete confusion in the 2 tier authority arrangement. Whose performance are you trying to measure? The County Council or the District Council?</p>
<p>5. Should data for this indicator be provided for any or all of the different equalities strands (please tick the relevant box)?</p>	<p>Ethnicity <input type="checkbox"/></p> <p>Gender <input type="checkbox"/></p> <p>Religion <input type="checkbox"/></p> <p>Age <input type="checkbox"/></p> <p>Sexual orientation <input type="checkbox"/></p> <p>Disability <input type="checkbox"/></p> <p>Other <input type="checkbox"/> (Please specify)</p>
<p>a) For any boxes ticked at 5, is this information already gathered and/or reported and, if so,</p>	

where? If not, what would be the estimated additional burden of collecting and reporting it?

6. Further comments on the questions above and /or any other comments that are not covered above questions.

1. National Indicator 185 is a bottom-up indicator. The LA is responsible for quantifying its carbon footprint and reporting progress on reducing it. The LA has ownership of the emissions and control in terms of finance. Consequently, it can develop policies and fund measures that will have a direct impact on its emissions profile. National Indicator 186 is for all intents and purposes a top-down indicator based on the disaggregation of UK emissions to LA level. The LA owns only a very small element of the emissions (in our case about 0.6%), has no direct control over the majority of them (99.4%) and has few powers or measures that will have a direct impact on the emissions profile. Moreover, the measure is only an estimate based on an apportionment algorithm and is at least 2 years out of date. This does not seem to be a good basis on which to prosecute measurable emissions reduction at a local level.

2. Most of the control aspects of the mitigation agenda are exercised by central government through legislation, regulation, national standards, fiscal measures, negotiated and voluntary agreements, grants and subsidies, carbon market creation and information provision. It is difficult to identify a parallel set of control levers at a local level which have the same power to alter behaviour patterns of local residents and businesses. Defra has identified the powers of 'planning, local transport and the promotion of well-being' but without any acknowledgement or quantification of their expected contribution to the per capita emissions reduction unless this is the highly aspirational 11% to 13% identified by AEA Technology. Moreover, 'significant influence' is expected to be the key weapon of the LSP – essentially information provision which is already being done through waste, energy efficiency and climate change campaigns and web sites. Without financial incentives or mechanisms to force everyone to undertake emissions reduction as life's default option, just talking about it is not going to reduce the DCC per capita carbon footprint (9.8 tonnes per person) by very much especially as only 2.6 of that comes from domestic sources. In order to move the indicator at all (i.e. 9.8 to 9.7) requires a reduction of 70,400 tonnes of CO₂ (i.e. 704,000 residents all contributing 0.1 tonnes of CO₂) - a 1% reduction across the board. A cost-effective price for reducing a tonne of CO₂ is about £1,000 hence this is a £70 million programme. However, there is an expectation from Defra of LA potential for an 11% to 13% reduction at a time when national CO₂ emissions are rising. So if the expected reduction target is 759,000 tonnes of CO₂ by 2010 (that's just 11% of the 2005 figure) we have ourselves a £750 million project. This about caters for the entire annual DCC budget. We have to get real about the size of this task and the potential cost of solutions before committing ourselves. As stated above the government holds all the cards and is only chasing a 2.2% annual reduction overall (see statement on NI 185). This would mean a Year 1 reduction in the indicator from 9.8 to 9.6 tonnes the majority of which will be

delivered by measures already in the UK Climate Change Programme and Energy White Papers. What element of the 0.2 tonnes per person does the government expect to come from planning etc?

3. In this context it has been argued that the LA influence on a per capita basis is very limited indeed. For example, electricity generation probably accounts for 3 tonnes of the UK average 9.3 tonnes per capita CO₂ figure. A shift in the energy mix perhaps away from coal to gas, nuclear and RE will have a measurable impact on every authority's per capita figure. Conversely, the run down of nuclear and replacement by coal will have the opposite effect. Such impacts will also happen in the transport world where changes in vehicle emissions are promoted through the RTFO, negotiated agreements on emissions and VED changes. Such impacts will almost certainly be more than the authority is capable of influencing and thus the indicator will be a reflection of government policy rather than good governance at a local level. In a rural county like Devon where there is a lack of energy intensive industry it is likely that the only room for manoeuvre is on the domestic front. This means the task is infinitely more difficult as to be successful one would have to persuade 704,000 residents to change their behaviour rather than a few major polluters.

4. This mitigation agenda has a very long timeframe and may not be appropriate to the very short term three year window of the LAA.

5. The timeliness of the data on which this indicator is predicated is a fundamental issue. The centrally published CO₂ emissions data for 2005 has been published in November 2007. This 2005 data will provide the baseline for the LAA. This seems a little ridiculous as the start point for action on reducing community emissions through the LAA is 2008 (at the very earliest). It also seems incomprehensible that performance will be measured against this 2005 baseline in 2008/9 for activity in 2006 about which we can now do nothing! The same will presumably be true in 2009/10 for 2007 data. Given the fact that data for 2006 and 2007 are largely irrelevant (as they are already in the past), if the 2 year time lag is maintained then 2008 data will not be available until November 2010 and 2009 data until November 2011. This latter date is outwith the LAA period. Moreover, performance for the last 2 years of the LAA will be need to be assessed long after the LAA is completed – probably early 2013 and 2014. Is this really a sensible approach?

6. This measure is to be applied both at a strategic authority level and district level. How do we work out what the District has contributed and what the County has contributed? The final insult is that Defra is the reporting organisation.

7. There is so much wrong with using the per capita data that an alternative solution is required. This should focus on a bottom-up approach where the emissions savings generated from local activity can be catalogued and, if necessary, externally verified. This is a principle of 'additionality' whereby the locally-generated emissions savings are in addition to those from the central government measures. Given the size and cost of the task, these projects may not shift the proposed indicator at all unless significant funding is

provided.

Completed versions can be sent to niconsultation@communities.gsi.gov.uk.
Hard copy responses should be returned to Local Government Quality and Performance Division, Zone J2, 4th Floor, Eland House, Bressenden Place, LONDON, SW1E 5DU.