

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:

188

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"/>
<p>If NO</p> <p>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</p> <p>b. Please suggest how the template can be clarified/improved.</p>	<p>There is so much wrong with the rationale behind this indicator. It confuses long term climate impacts with short term weather impacts. There is no timescale in the proposed plan. It is based on a process (NDAP) which does not work. It is about producing a plan and not action. It does not recognise the role of UK Resilience and how that contributes. Para 6 has more detail on each of these and more.</p>
2. Does the Technical Definition for this indicator have any unintended consequences?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>If YES</p> <p>a. What are the unintended consequences on this national indicator?</p>	<p>Unnecessary expenditure. The adaptation response to climate change is not</p>

<p>b. Can the unintended consequence be avoided? If so, how?</p>	<p>for "everyone to do everything now" - that's what insurance is for. See para 6.</p>
<p>3. Will the Technical Definitions for this indicator work in practice?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>If NO a. Why would this technical definition not work in practice?</p>	<p>The indicator is framed in a way that a Council will develop a single adaptation action plan at a particular moment and that's it. This is ludicrous. Climate change is with us for the next millennium at least and the impacts will get gradually more severe. This process is however very slow in human (and business terms) and most of the adaptation responses will be undertaken autonomously without the need for a plan - the market will adjust.</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>All councils need business continuity planning for their own internal response to extreme weather events. Moreover, they all need to know how they contribute to Local Resilience Forums and the emergency planning response for communities. A better measure would be based on identifying the risks of severe weather in the community risk register and making sure that appropriate responses are identified.</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, where? If not, what would be the estimated additional burden of collecting and reporting it?</p>	
<p>6. Further comments on the questions above and /or any other comments that are not covered above questions.</p>	
<p>1. The proposal is to base this activity on the Nottingham Declaration Action Pack for adaptation. Having witnessed the development of the NDAP tool over a number of years, we have taken the decision to try and develop our own methodology in the absence of a more meaningful and usable contribution to the adaptation debate. The NDAP tool is an attempt to fit a 5-step project management solution developed by the Carbon Trust for mitigation purposes to the adaptation agenda. Whilst the 5 steps work well for a Carbon Management Programme they are not appropriate for an adaptation strategy.</p> <p>2. At the outset there is a need to understand the very real difference between weather and climate. Weather is the here and now and is the thing that will hurt us. Climate is the 30 year average of the weather. From an adaptation perspective we need to respond to potential changes in weather urgently. By its very nature we can take our time over reacting to changes in climate.</p> <p>3. The proposed approach is based on a naïve understanding of what is required. The adaptation agenda is the most difficult aspect of the climate change solution given that we do not know the magnitude, frequency, timing or location of any future impact – uncertainty is king! Moreover, it is widely stated that the climate beyond the next 30 years is not yet determined adding to the extreme difficulty of building a robust business case for action. Therefore, the basic premise that once we have identified a future climate scenario all we</p>	

need to do is put in place measures that protect us from its impacts is a crude notion. The proposed indicator is based on a false logic of anticipatory adaptation both across the board and through time to 2100, whereas in practice we undertake post hoc adaptation based either on experienced events or lessons learned from elsewhere. These actions usually appear as improved standards that are not often subject to retrospective embodiment which is a key problem. In terms of the cost implications, implementing adaptation measures at all potential locations is a hugely expensive option hence the need for a robust insurance mechanism to spread the costs across society. Everyone doing everything is overkill. Action has to be based on vulnerability.

4. Most people recognise that climate change will deliver changes in extreme weather events and it is this potential that we have to deal with as the priority. We also need to recognise that there will be big events about which we can do absolutely nothing other than issue timely warnings and implement well-structured and fully resourced recovery plans. Recently we have been going through the UKCIP Local Climate Impacts Profile (LCLIP) process to understand what a potential adaptation response looks like. LCLIP is UKCIP's current preferred methodology for starting an adaptation strategy. Having reviewed a number of recent weather events for their impacts, we always came back to the same issues - governance, communications, utilities and transport. Having come to this conclusion it appears that the UK Resilience civil contingencies process deals with all of this very well. Recent hearings of the EFRA Select Committee with key players in the summer floods confirm how well the process worked. Moreover, the Community Risk Register produced by the Local Resilience Forum has a severe weather component which identifies the major weather events and categorises the attendant risks using the familiar frequency of occurrence and severity of impact criteria. Whilst there may be some work to do to make sure the risks are properly identified, the basic principle is sound. We are content on this basis that we are a level 4 authority as we have this process in place. When it comes to the internal business view, we also adopt the complementary business continuity planning approach recommended (mandated?) by UK Resilience and again this covers (implicitly) the climate change aspects. Therefore, our operational business, services & community disruption/disaster/catastrophe are covered by a mandated national process (for which there is also a British Standard) and there is no need for us to invent a new procedure to come at this from a climate change perspective. It exists.

5. Having got extreme weather events out of the way, the slower time aspects of adaptation relate to climate change. In this context one needs to put a time horizon on the planning required because without one the question that is being asked makes no sense. There is no timeframe associated with the Defra indicator. As the normal strategic planning horizon for a local authority is 20 years, it would be useful to think about adaptation in this timeframe. Today this date is in the middle of the period known as the 2020s where climate conditions are not significantly different from those today – perhaps a further 1°C temperature rise and a marginal drying. Indeed, this is a sensible forward look in that the climate beyond the 2020s (i.e. a 30 year period out to 2040) is not yet determined – it is totally uncertain! Given the above limitations what is

the expectation of adaptation requirements in the 2020s? Perhaps a key question to ask might be something like this:

Q. The temperature rise expected over the next 20 years is about the same as that over the last 30 years. Therefore knowing what you know now about the climate in 2007, what would you have done in 1977 to prepare for today's conditions?

Once you can answer this you have the basis for an adaptation plan.

5. In terms of opportunities, we take the view that this will be principally market driven - you cannot grow oranges in Teignmouth until oranges will grow in Teignmouth. There will always be investors who will be prepared to take the risk to get first mover advantage and therefore most adaptation will be autonomous. It will just happen as I suspect most of that since 1977 has. That leaves one area that is not covered and that is the adaptation of public infrastructure to cope with whatever is currently projected. This needs to become part of a routine maintenance regime so that we only bear the marginal costs of changed specifications. Such maintenance regimes are likely to be precipitated by changed national standards such as building regulations although we may have to instigate appropriate inspection regimes where we are concerned with public safety.

6. This indicator is not presently aimed at County Councils.

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.