

Response to Defra's Consultation on the Government's Proposed Strategy for the third round of the Climate Change Adaptation Reporting Power, from the Chairs of the Local Adaptation Advisory Panel, England and the Association of Directors of Environment, Economy, Planning & Transport's Environment Board

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This submission is from Nigel Riglar, Chair of the Local Adaptation Advisory Panel (LAAP), England and Paula Hewitt, Chair of the Association of Directors of Environment, Economy, Planning & Transport's (ADEPT) Environment Board.

The LAAP was formed in 2011 by Defra to act as an efficient forum for dialogue between local government, central government and arms-length delivery bodies. Its Secretariat is provided by Defra. The LAAP played a key role in shaping the Local Government Chapter of the National Adaptation Programme report (NAP), published in July 2013. The LAAP Terms of Reference are included for reference in **Annex 1**.

The majority of the LAAP steering group comprises local council officers along with representatives from Government, the Local Government Association (LGA) and other local government organisations and partners. They bring professional expertise and knowledge with the aim of supporting and furthering the adaptation agenda in the local government sector. In line with the Terms of Reference for the LAAP, this submission represents the collective personal views of those council officer members and representatives from the LGA and Climate UK.

ADEPT represents 'Place' Directors, the strategists and policy shapers across top tier local authority areas, the leaders who design long-term strategies for place-based services.

The local government sector has a central role to play in delivering actions to help local places adapt to a changing climate. Local councils are the elected and accountable bodies responsible for planning and shaping local places. The localism agenda means that effective two-way dialogue between local and central government on how to support local adaptation action is essential.

Our response to the consultation questions is set out below.

Do you agree that reporting in the third round should continue to be voluntary?

No. Voluntary reporting gives an indication of the development of resilience however it is an incomplete understanding. The LAAP considers that the voluntary model of reporting has the inherent danger of skewing the results to these organisations that have made progress and are keen to report, whereas those who are failing to embrace the necessity of adaptation are unlikely to report this on a voluntary basis.

Do you agree with the principles for reporting in the third round?

Yes. Despite having concerns (see above) about the voluntary reporting the LAAP broadly agrees with the approach. It is recognised that this intention minimises potential resource impact of a mandatory reporting requirement. However a proportionate and flexible mandatory reporting requirement is not necessarily burdensome.

Do you agree that reporting in the third round should build on the second round by agreeing sector or organisational reporting proposals?

The LAAP largely agrees with this.

Do you agree that the reporting date should be determined by sector, reflecting on regulatory or business pressures within the reporting window of 2019-2021, with a final deadline of 31 December 2021?

The LAAP broadly welcomes this approach recognising that to do otherwise may lead to inconsistent and incomplete reporting.

Do you agree that the criteria for identifying eligible organisations are reasonable? Are there other factors that might be useful to consider?

Largely. It is important that those reporting on adaptation are those with the greatest impact and need to implement resilience. Removing the requirement to report from organisations that do not have adaptation embedded is considered counterintuitive. Care must be taken to ensure that any organisations no longer required to report do not take the message that adaptation is no longer important.

Are there any other sectors which you believe should be included on the list?

The LAAP consider that local authorities should be included on the list, as recommended by the Committee on Climate Change in their latest progress report to Parliament in preparing for climate change adaptation:

“26. To stimulate activity and improve monitoring and evaluation, local authorities should be included within the scope of the third round of reporting under the Adaptation Reporting Power. Defra should identify the most efficient and effective means for local authorities to report on the action they are taking and the progress being made to prepare communities for climate change.”

Such an approach would empower local officers to push for both resources and actions in order to meet the reporting requirements and has the most potential to improve/increase the adaptation actions undertaken within local government. It is also noted that this mirrors the approach the Government has indicated in the Clean Growth Strategy for Councils reporting on carbon emission reductions.

The LAAP welcomes Defra’s recognition *“...that local councils already have a range of duties and reporting obligations highlighting the important role they play in addressing a range of climate risks...”* However the present reporting regime lacks a direct requirement to focus on the key concern of climate change. As such this may not address the stated secondary objective of reporting, i.e.

“...a secondary objective of understanding the level of preparedness of key sectors to climate change, at a sectoral and national level, to feed into the ASC’s reports to Parliament.”

Further to this the LAAP is concerned that the absence of a mandatory requirement to report on adaptation may potentially result in a lack of a high level strategic approach to adaptation per se within some local authorities.

Are there any organisations that the Government proposes to invite to report which you believe should not be included?

No.

Are there any organisations that have not been included which you believe should be?

Other than the Local Authorities (see above), no such organisation has been identified.

Do you agree with the additional situations in which organisations may be asked to report? Would you suggest any others should be included?

Yes.

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