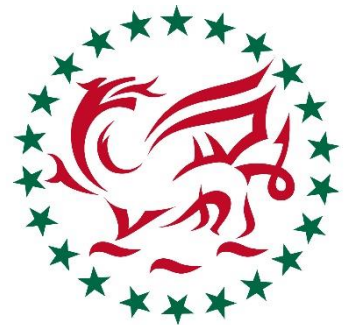




# Welsh Government Draft Climate Change Adaptation Plan for Wales - Consultation Response

4th March 2019



CLILC • WLGA

## Introduction

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, the three fire and rescue authorities, and four police authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. We welcome the opportunity to contribute to the consultation on the 'Draft Climate Change Adaptation Plan for Wales'

## General comments

4. It is commendable that Welsh Government is committed to mitigating climate change through a programme of decarbonisation. The Environment (Wales) Act 2016 introduced some important mechanisms to help drive progress. It is important that these are now used to full effect.
5. There clearly is a need to adapt, or to be ready to adapt, to climate change. However, it is also important to take actions, locally, nationally and globally to reduce the potential for climate change. First there should be action to avoid negative impacts on climate change; if those negative impacts cannot be avoided then actions need to be taken to minimise them. If the negative impacts cannot be minimised, measures should be taken to mitigate them as far as is possible, along with plans to adapt to the consequences. The essential point here is that we should not look at adaptation to climate change in isolation. If the above steps /actions are taken in order, the need to adapt could perhaps be reduced.
6. One of the 5 Ways of Working in the Well-being of Future Generations Act is 'Prevention'. If trends are identified that are considered unacceptable (e.g. in relation to future GHG emissions scenarios) we need to be taking urgent action together to prevent the projections becoming a reality.

7. In August 2013, in a Sectoral Adaptation Plan (produced by a sub-group of the Climate Change Commission for Wales, in conjunction with Welsh Government) it was reported that: *"The last few years have shown us how vulnerable Wales is to increased frequency and extreme variability in the weather and climate. We have experienced extreme weather events such as snow, near drought conditions and flooding in the summer and winter. All of these events have affected businesses, road and rail, people's homes and health and have had a knock on effect to communities and the economy in Wales."* This is as true today as it was then and the need for urgent action is plain to see. The timescales associated with some of the actions in the Plan may need to be kept under review to reflect this urgency. There does not appear to be any reference to the earlier work that was undertaken on sectoral adaptation by a series of working groups (which covered Natural Environment, Business and Tourism, Communities, Historic Environment and Infrastructure). There may be value in revisiting that work to ensure that all relevant issues and proposals have been picked up and covered in the latest plan.
8. The WLGA agrees with the Minister's words in the final paragraph of the Foreword: "Delivering our plan will be a challenge, but we must all adapt and we must all commit"

**QUESTION 2: Overall, to what extent do you agree with the potential actions for adapting to climate change set out in this document? Please explain the reason for your answer.**

9. The document sets out some areas where new actions are proposed but also includes several activities that are already happening and where updates and reviews are planned. There is a need to weigh up how all the various actions proposed relate to the range and scale of the challenges faced. This will help to identify if these actions are sufficient and if there are any gaps. Monitoring over time will be important here too, to assess if interventions are having the desired effect.

10. The commitment by Welsh Government to continue collaboration with the UK CCC to monitor the levels of risks across all sectors is commendable (page 29). Ten of the 21 risks highlighted in the UKCCC CCRA Evidence Report as 'Research Priorities' for Wales have been designated as 'watching brief'. The UKCCC defines these risks as those which should be kept under review, with long-term monitoring of risk levels and adaptation activity so that further action can be taken if necessary.
11. Action CCAPW-HP5 *'Work with Public Service Boards (PSB) to support adaptation and capacity building at the regional level'* raises questions as to the role of PSBs. Successful mitigation and adaptation to climate change is *relevant* to their purpose but PSBs are not a regional body, nor do they have a regional role. Each PSB is co-terminous with the Local Authority boundary and is responsible for undertaking an assessment of the social, economic, environmental and cultural well-being within its area. They are then charged with developing a Well-being Plan, based upon the assessment, to improve the social economic, environmental and cultural well-being within their area. Also, Natural Resources Wales (which is a core member of the PSB) is named as a stakeholder and deliverer *in addition to* the PSB.
12. Finally, it is worth noting that there is some inconsistency in the terminology used in the lists of 'stakeholders' and 'who will deliver' (e.g. in some cases reference is made to 'devolved administrations', in other cases 'Welsh Government' and in CCAPW-ST3 both terms are used).

**QUESTION 3: Please tell us if you have any ideas for how we should deliver the potential actions for adapting to climate change.**

13. It is important that visible interventions and behaviour change are taking place alongside further work to assess and gather information about the impact of climate change.
14. The Welsh Government in 2011 published the National Strategy for Flood and Coastal Erosion Risk Management (the National Strategy will be revised and republished in 2019) In the original strategy document 4 overarching objectives were highlighted:

- i. Reducing the consequences for individuals, communities, businesses and the environment from flood and coastal erosion
- ii. Raising awareness of, and engaging people in, the response to flood and coastal erosion risk.
- iii. Providing an effective and sustained response to flood and coastal erosion events., and;
- iv. Prioritising investment in the most at risk communities.

15. These are as relevant now as they were 8 years ago and provide a basis for action and delivery. In addition Wales now has the Well-being of Future Generations Act 2015. It too provides a framework for action, with its 5 Ways of Working. These help 'upstream' to shape and inform policy, strategy and action. Its sustainable development principle requires us to improve the economic, social, environmental and cultural well-being of Wales, ensuring that the needs of the present are met without compromising the ability of future generations to meet their needs.
16. In addition to the UKCCC recommendations, consideration could perhaps be given to using analysis contained in the Future Trends Reporting, associated with the Well-being of Future Generations Act. the identification of trends that will take us to a future that is considered unacceptable can help to indicate where preventative action is needed.

**QUESTION 4: We strongly believe everybody has a role to play in adapting to climate change. What ideas do you have to adapt and contribute to our objectives?**

17. WLGA agrees that everybody has a role to play and also that there needs to be a significant behaviour shift not only in responding and adapting to the impacts of climate change but equally in taking actions to address the causes of climate change - e.g. reducing carbon emissions; encouraging more sustainable transport; promoting and using renewable energy; recycling of waste; reducing reliance on single use plastics.

Actions *are* being taken in these areas by Welsh Government, local authorities and others and it is important that all of these are identified as part of an integrated and coherent response to climate change.

**QUESTION 5: What else can Welsh Government do to improve communication around the risks and impacts of climate change and the need for adaptation?**

18. There is always potential to do more to raise awareness and engage with the people of Wales. Welsh Government, local authorities and the wider public sector can lead by example – communicating through actions as well as words; e.g. increasing the use of electric or hybrid vehicles.
19. There need to be consistent, understandable and reasonable messages as part of an overall communication strategy from Welsh Government, developed in partnership with stakeholders.

**QUESTION 6: How can you contribute to communicating the risks and impacts of climate change and the need for adaptation?**

20. There are a number of references within the proposed actions to Local Authorities being either stakeholders or organisations who will deliver. There are also proposed actions where the Local Authority would expect to be involved as a stakeholder or deliverer but no mention is made.
21. It is essential that there is correlation between actions which can impact climate change and actions to adapt to the effects of the impacts of climate change, for example people adapting their behaviour to reduce carbon emissions as part of the programme to address fuel poverty
22. There needs to be a corporate approach to ensure that all departments within Local Authorities are aware of how proposed action plans will affect their areas of operation and, where appropriate, can advise the public accordingly.

**QUESTION 7: How do you think the potential actions to adapt to climate change might affect you or the organisation you work for?**

23. Local authorities can play a major role in efforts both to tackle the causes of climate change and to adapt to the consequences. This can be through their own actions and activities and in their community leadership role. For that to happen to maximum effect there will need to be substantial behaviour change, across organisations and communities. This will be achieved far more effectively if there is a consistent and agreed approach, so that solutions are co-produced and new behaviours become the 'norm'.

**QUESTION 8: How do you think the potential actions in this plan might affect the following: Public Health; Communities; The Welsh Language; Equality; Children's rights?**

24. If the actions in the plan have their intended outcome, they should yield positive benefits in relation to public health and communities in particular. If they prove to be inadequate there could be serious negative effects. For example, the impact of extremes of temperature has been well documented with heatwaves in Europe for several years since 2000. A number of extreme winters in UK since 2009/10 also provide evidence of the impact climate change can have on the population and the economy.
25. The increase in global temperatures in countries near the equator could have an impact if it triggers migration to countries in the relatively cooler north. This could place increased demands on the health resources, whilst also introducing a range of new challenges.
26. The effects of flooding and drought, of high temperatures and very low temperatures can have an individual impact upon people, their homes and their health which, cumulatively, can impact on the wider community .
27. Any effects upon the Welsh Language are not immediately evident.

**QUESTION 9: How do you think the potential actions to adapt to climate change might contribute to achieving the national well-being goals?**

28. The national well-being goals are inter-connected and inter-relate to each other. The descriptions for each of the goals make clear what is expected. The proposed actions need to be clearly defined to ensure that adaptation is the last resort and that actions taken to avoid, minimise or mitigate are implemented now to reduce the need to adapt.

**QUESTION 10: Do you have any other comments about this consultation?**

29. The WLGA would welcome the opportunity to be involved in supporting Welsh Government in the development of its Climate Change Adaptation Plan.

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**For further information, please contact:**

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