

SSW initial comments based on 'Delivering a Regional Climate Change Action Plan' – Project initiation document

1.0 Regional context

SSW welcomes the opportunity to input to the development of the climate change action plan. As a region, the South West is increasingly adopting commitments to achieve reductions in Greenhouse Gas (GHG) emissions. In implementing national guidance (principally that enshrined within the national Sustainable Development Strategy which makes clear that tackling climate change is an urgent priority for immediate action), the Regional Sustainable Development Framework's mission is that 'people in the South West choose to live, work and prosper within environmental limits'. This is supported by the Regional Economic Strategy (RES) whose statement of intent is to 'demonstrate that growth can be secured within environmental limits to bring prosperity to the region'. Emerging statutory planning guidance, through the Regional Spatial Strategy (RSS), also supports this approach by setting an overarching regional CO₂ reduction target and including policies which help integrate a low carbon approach. We believe the development of this plan offers the region a significant opportunity to agree definitive action and targets to reduce GHG emissions.

2.0 Pace and scale of action needed

Despite a national commitment for the UK to reduce CO₂ emissions by 60% by 2050, reductions have been painfully slow. Since 1990 emissions have reduced by a mere 4% (with the move of UK manufacturing companies overseas simply transferring CO₂ emissions elsewhere) and this gradual trend of decline is starting to be reversed. ***SSW's carbon budget for the South West (see annex 1) shows that as a region we are currently consuming over 10% more than our fair share of carbon.***

The wealth of evidence makes it is clear that we must all play our part and take action now. Climate change experts now advise that action taken over the next 8-10 years will count most in the battle to prevent very dangerous runaway climate change. The Stern Review recognises the longer we wait to act effectively, the greater the costs to society and the economy will be. **It is with this knowledge that the South West's emerging climate change action plan must seek to agree ambitious and definitive action to secure GHG emission reductions. Activity should focus on engaging delivery partners and agreeing definitive action within a short (i.e. the next 10 years) timescale. These delivery agents must lead by example by putting GHG reduction activity at the heart of their policy and practice.** An active and public reporting progress will enable these organisations to highlight where achievements have been made – sharing good practice and lessons learned.

Alongside a sharp focus on achieving GHG emission cuts, SSW believes that an emphasis should be placed on overcoming obstacles to taking action to reduce GHG emissions.

3.0 Detailed comments on the Project Initiation Document:

Section 1: Background and Goals

The goals and objectives of the draft plan need to be brought into sharp focus against delivery and specifically achieving cuts in GHG emissions. We welcome the ambition to secure endorsement by a wide range of partner organisations and believe the plans success should be measured on their progress in achieving GHG emissions reductions. The work being carried out in Yorkshire and Humber provides a good example of a regional climate action plan focussed around the delivery of action by key players within a short time timetable.

SSW also notes in Section 1 Background and Goals, the proposed development of an agreed set of regional accounts and accounting systems. As per our previous discussion and correspondence with Assembly representatives, SSW has already developed an overarching regional carbon budget that could be used to form the basis of these carbon accounts. Annex

1 contains further details of the methodology and the United Nations endorsed Contraction and Convergence model, on which the data sets are based. As previously outlined SSW supports this internally recognised global framework for reducing CO₂ emissions to safe levels in a socially just way. We recommend these data sets are applied in the development of the regional climate change action plan and are used to form the carbon accounts and targets developed. It is essential that as part of the regional carbon accounts, climate change mitigation targets are developed alongside those concentrating on adaptation activity.

Section 2: Scope of the project

Lobbying

Under the main areas of activity, 'influencing and lobbying' and 'policy development and review' is listed. SSW believes that activity arising from these categories could support real progress in achieving GHG emissions reductions. For example, inconsistencies in central government policy continue to lead to the South West adopting high carbon proposals – such as airport expansion. Lobbying activity could focus on ensuring that these inconsistencies in central government policy are resolved and that consistent low carbon policy is adopted to support reductions in GHG emissions.

Delivery

Delivery is identified as the remaining focus of activity for the plan. This is very much welcomed and as highlighted above, SSW believes that activity should also focus on engaging delivery partners and agreeing definitive action within a short (i.e. the next 10 years) timescale. These delivery agents must lead by example by putting GHG reduction activity at the heart of their policy and practice.

Overarching principles

SSW supports the application of the overarching principles and believes that leadership – including the support of some risk taking – and changing behaviour is key. SSW believes (again with a focus on delivery) that the fundamental outcome should be to achieve GHG emissions reductions in the context of broader sustainable development and this should be added to the current list of overarching principles, activities and outcomes.

Issues addressed

With the support of an inclusive independent cross sectoral advisory body and full range of partners & stakeholders, the plan could and must address all those areas of activity which contribute to greenhouse gas emissions if it is to take a credible, effective lead on reducing climate change.

Section 3: Timescale

The timescale for this plan is critical if it is to have the most impact in avoiding catastrophic runaway climate change. The emphasis must be placed on achieving GHG emissions cuts in the immediate future (i.e the next 8-10 years). Although we appreciate that current activity is focussed on developing plans for the launch of the draft strategy in July 2008, it must be recognised that this is merely the starting point. Beyond this date the plan will need to be resourced and much thought must be placed on supporting delivery of the aim to achieve cuts in GHG emissions. No doubt plans for this are being made but these appear to have been omitted from the project initiation document.

SSW also notes that according to Annex 4 there does not appear to be planned activity for defining (external) roles and responsibilities. Again in placing the emphasis on delivery we feel this is a crucial part of the process and activity to agree definitive action with the key players must occur before the launch of the draft strategy in July 2008.

Section 4: The Tasks

4.1 Scope/coverage

SSW, as the region's independent, cross sectoral, sustainable development champion body and critical friend requests an opportunity to respond to the mini-consultation on scope/coverage. (A list of SSW's current membership appears below)

4.2 Evidence base

Although SSW supports the use of evidence to help inform policy, we urge the Regional Assembly not to deflect resources on gathering (yet) more detailed data when we already have a very clear idea in what direction policy & practice must go and over what timescale. The major sources of GHG emissions are well documented and we must use this existing evidence to guide immediate action on reducing emissions. Crucially data gathering must not substitute definitive action. As highlighted above, SSW, using the internationally recognised C&C model, has already calculated the carbon budget for the South West.

4.4 Communications

We note reference to the SWCCIP and the related work in communicating to the general public issues surrounding climate change. It must be made clear that the SWCCIP currently exists to promote adaptation rather than mitigation. Climate Change mitigation is at the heart of SSW's strategic partnership activities including the co-ordination of the RSDF on line sustainability tool; Fair Shares, Fair Choice – which offers help and advice to business, organisations & individuals based on the 10 year regional carbon budget for the South West (please visit the website to see sign ups for the initiative from all sectors); Future Foundations – the region's sustainable construction initiative and Future Footprints – the region's visitor focussed sustainable tourism initiative.

4.5 Roles and Responsibilities

SSW believes that working to deliver the wider regional agenda within a 10 year carbon budget will facilitate the stronger, more effective, integrated regional leadership which is now urgently required to reduce the social, economic and environmental costs associated with climate change.

4.6 Delivery

As above, SSW believes that the clear focus of this strategy should be on achieving cuts in GHG emissions. Although we feel that strategy refreshes and reviews may be useful, there should also, meanwhile, be adopted a stand-alone plan which clearly defines who is going to take action and by when.

5. Partnerships and linkages

SSW's members, partners and cross sectoral networks have the capability to provide an external credibility check on the plan. In our role as the region's independent champion body for sustainability we are already tasked by Government to act as a 'critical friend' to the regions agencies. We recognise tackling climate change as the biggest and most urgent of our sustainability challenges and this is reflected in our membership and work programme. We propose that the Regional Assembly considers maximising the existing resource that SSW offers and one which is already resourced by all the key regional organisations.

Sustainability South West Members 06/07 period:

Julian Dennis (Wessex Water) <i>Chair.</i>	Bryony Houlden (Chief Executive, South West Regional Assembly),
Gareth Allen (ITV Westcountry)	Brian Kennelly (Geo Science)
Bob Bewley (Regional.Director.English Heritage)	Cate Le-Grice Mack (Vice Chair. South West Regional Assembly)
Mike Birkin (Regional.Director R.D.Friends of the Earth)	Anita Longley (RWE Npower),
John Blewitt (SD Professor- University of Exeter)	Jackie Longworth (Trade Union Congress)
Philip Bostock (Chief Executive. Exeter City Council)	Sarah Morris CBI
Tim Boyes-Watson (Chief Executive, Learning South West)	Judith Reynolds (Co-Active)
Richard Cresswell (Regional Director, Environment Agency)	Amy Robinson (Bordeaux Quay Restaurant)
Colin Drummond (Chief Executive, Viridor Waste Management)	Andrew Slade (Observer) (Government Office for the S.W.)
Paul Gompertz (Devon Wildlife Trust)	Hazel Stuteley OBE (Strategic Health Authority)
Mark Harold (Regional Director, National Trust)	Louise Thornhill (Natural England)
Chris Hines (Sustainability Manager, Eden Project)	Janette Ward (Regional.Director, Natural England)
Simon Hooton (Head of Policy, South West Regional Development Agency)	Brendan Yates (Department of Health)