

**LOCAL GOVERNMENT NATIONAL INDICATOR SET NOV 2007 –
UK HECA RESPONSE TO CONSULTATION DOCUMENT**

NI Number: NI 185 CO₂ reduction from Local Authority operations

1. Is the Technical Definition of this indicator clear? Yes

2. Does the Technical Definition for this indicator have any unintended consequences? Yes

a. What are the unintended consequences on this national indicator?

- The definition is clear but the prescribed tool lacks any detailed guidance. This will lead to wide ranging assumptions/approaches and incomparable data across local authorities.
- The design of the housing input worksheet is flawed – it only measures improvements arising from the filling of cavity walls. It does not capture savings from other traditional energy efficiency improvements such as loft/roof insulation, heating, solid wall insulation, floor insulation or double glazing, or savings arising from decentralised/renewable energy.
- The collection of housing data is a duplication of information that will be collected nationally under NI 186.

b. Can the unintended consequence be avoided?

- Government should issue comprehensive detailed guidance on how the tool should be used.
- 'The Input 3 – Housing' worksheet should be omitted.

3. Will the Technical Definitions for this indicator work in practice? Not in all LAs

The proposed approach is very resource intensive in terms of officer time. It will require considerable time for a co-ordinating officer to collate the information and further resource at the service area level in collecting and reporting it. Many smaller authorities will not have the resource to undertake this.

4. Is this indicator defined at the right spatial level? Yes

5. Should data for this indicator be provided for any or all of the different equalities strands (please tick the relevant box)? N/a

6. Further comments on the questions above and/or any other comments that are not covered above questions. None