

sustainable development commission

SDC Submission to
Draft Programme for Government
2008-2011

December 2007

1. The Sustainable Development Commission (SDC)

1.1. The SDC is the Government's independent advisor on sustainable development. Through advocacy, advice and appraisal, we help to place sustainable development at the heart of Government policy. In setting out the Executive's intentions to build a peaceful, fair and prosperous society, the draft Programme for Government is of enormous significance for the future of Northern Ireland. We therefore welcome this opportunity to respond to the document.

2. Introduction

2.1. The SDC sees many positive elements in the draft Programme for Government, including:

- Fostering a high quality of life for those who wish to work and live here
- Creating strong, vibrant sustainable communities
- Providing more social and affordable housing
- Reducing our impact on climate change
- Using Government procurement to tackle patterns of socio-economic disadvantage

2.2. The SDC especially welcomes the inclusion of sustainability as a cross-cutting key theme. In committing to ensure that the principles of sustainability underpin all its activities and in declaring that it will demonstrate that commitment through its decisions and actions, the Executive has recognised the criticality of sustainable development. In this response, the SDC considers how the PfG intends to deliver its work in the context of the two over-arching principles of sustainable development - living within environmental limits and ensuring a strong, healthy and just society.

3. Living Within Environmental Limits

3.1. Reducing our Carbon Footprint

3.1.1. The PfG has correctly recognised the gravity of climate change as a global threat. Its response is to re-work an existing goal - to reduce our carbon footprint by at least 25% by 2025. In the corresponding PSA 22, this is interpreted by the target to reduce greenhouse gas emissions by 25% below 1990 levels by 2025. The emerging targets in the Climate Change Bill will seek to legislate for carbon reduction targets of between 26-32% by 2020. The variety of these targets lends no clarity to the Government's ambition.

3.1.2. However, the PfG demonstrates a new awareness of the real threat presented by climate change. That understanding must now be translated positively into real, concerted action. It is imperative that in the Business Plans of the three departments identified in PSA22.1 (DOE, DETI, DSD), there are commitments to outcomes which will begin to reduce our carbon footprint. Climate change impacts are already being observed and it is this short-term action which will set us on the correct path towards achieving the longer-term targets. We would welcome the inclusion in the PSAs of shorter-term targets, which should be designed to achieve ambitious cuts in emissions over the next 15 years, consistent with a precautionary approach.

3.1.3. In its NI Vision Studyⁱ, the Carbon Trust made ten clear recommendations, concentrating on improving energy efficiency as an immediate requirement, increasing our exploitation of renewable energy and low carbon technologies as time progresses, as well as considering the energy demands of communities through land-use planning. This excellent suite of recommendations, together with information arising from the study of sectoral emissions currently under development, should form the framework through which to pursue the Executive's desire to grow a dynamic, innovative economy in what is certain to be a carbon-constrained future.

- 3.1.4. The only PSA references to increasing our use of renewable energy is the target in PSA1, repeated in PSA22, of securing 12% of electricity consumption from indigenous renewable sources by 2012. Our current use of indigenous renewables provides around 4% of electricity. A further 40 applications for wind farms are with Planning Service; if all were to be successful and commissioned by 2012, this target would be achievable. However, that seems highly unlikely, given grid constraints and planning objections. In addition, the impetus provided by the Environment & Renewable Energy Fund is likely to be dissipated with its demise. It would therefore be helpful to have some more explicit commitments to the diversification of renewable energy generation – through biomass, from ocean sources, by micro-generation, for example – in PSA1.
- 3.1.5. Public sector leadership is important in setting an example to other parts of society. One of the implied targets of PSA22 comes from the NI Sustainable Development Strategy - to make the Government estate carbon-neutral by 2015. It should be re-stated explicitly in the PSA.
- 3.1.6. Managing our carbon emissions will be the most critical of all environmental limits in the coming years. The Executive's implementation of the pioneering Climate Change legislation will benefit from the contribution of expert advice in Northern Ireland, such as that embodied in the Climate Change Commission, recently established in Wales.

3.2. Infrastructural Investment

- 3.2.1. The PFG correctly recognises the considerable investment required to improve Northern Ireland's infrastructure; the Investment Strategy fleshes out the prioritised projects for the next ten years. Whether the funding is for new health facilities, major works at existing schools or the regeneration of our towns, it is expected that the resulting physical infrastructure will be in use for many decades. It is fundamental, therefore, that the principles of sustainable development should underpin all such procurement.
- 3.2.2. The SDC recognises and applauds the excellent example set by the Health Estates agency in procuring award-winning buildings, such as the Hollywood Arches CCTC, which are widely admired for their design and for their incorporation of sustainability criteria. There are other excellent projects in the schools estate, such as the highly energy-efficient Kilmaine Primary School. However, these examples seem to represent exceptional best practice and it should be our intention to make such projects commonplace. The ISNI states that the SIB is "encouraging departments to build in sustainability as comprehensively as possible into each of their infrastructure projects" but the Executive's imperative of ensuring that the principles of sustainability underpin all activities demands more. At the very least, all departments should comply with the Sustainability Action Planⁱⁱ produced by the Government Construction Clients' Group, rather than use it as optional guidance. Such an explicit commitment could helpfully reinforce the targets in PSA11 and PSA16 (in the case of the health and education estates).
- 3.2.3. The SDC recognises the need for substantial investment to improve and maintain Northern Ireland's rural roads network and, where possible, we would encourage the greatest possible use of modern engineering practices to reduce primary resource use and meet the highest environmental criteria, in the use of sustainable urban drainage systems, for example. A commitment to the best practicable environmental option could usefully be included in PSA13.2. Similar good practice should be observed in the development of our water and sewerage infrastructure (PSA15) However, the planned expenditure on transport is heavily weighted in favour of roads, an imbalance that is at odds with any desire to tackle climate change. Certainly, the SDC welcomes the proposals for a new rapid transit system for Belfast and the extension of free public transport for the over-60s but we would prefer to see a significantly greater allocation of funds to public transport facilities, as well as the promotion of walking and cycling, with the ancillary health benefits.

3.2.4. The influential Stern reportⁱⁱⁱ made three key policy recommendations to address what it called ‘the greatest market failure the world has ever seen’. Stern highlighted the pricing of carbon, support for innovation and low-carbon technologies, and action to remove barriers to energy efficiency as essential elements in the economics of climate change. We are tackling the last of these through DETI leading the government’s strategy to deliver energy efficiency. Innovation lies, literally, at the heart of the PfG and it would be helpful to see a more explicit acknowledgement of how research and development targets in PSA1 and the concomitant skills acquisition targets in PSA2 can reflect the inevitability of a carbon-constrained future economy. The Chancellor of the Exchequer has acknowledged^{iv} that new legislation will place carbon in “what amounts to a parallel currency and a parallel budget that will have to be managed alongside the revenue and expenditure the Treasury manages today.” Carbon pricing is highly likely to influence markets in the years to come, not least in capital investments. Some consideration might usefully be given within PSA2.1.5 to a pilot scheme to incorporate carbon accounting within procurement.

4. Ensuring a Strong, Healthy and Just Society

4.1. Sustainable Communities

- 4.1.1. People want safe, attractive and affordable places to live, from where they can readily access their places of work, suitable schools and recreation facilities. If these criteria are in place, they will provide the building blocks for a strong, healthy and just community – what SDC defines as a sustainable community. Similar aspirations are described in DSD’s Neighbourhood Renewal Strategy and in Sir John Semple’s *Review into Affordable Housing*^v.
- 4.1.2. SDC is encouraged by the Executive’s endorsement, through its inclusion in PSA12, of the existing government policy on Architecture and the Built Environment^{vi}, which embraces sustainable development as one of its three guiding principles. We are also pleased to note, in PSA12.5, the continuing emphasis on the need to deliver the key targets on sustainable communities. The current SD Implementation Plan has far-reaching targets on sustainable communities; it will be important that the intentions underlying these targets are replicated in the revised Implementation Plan, featured in PSA11.3.
- 4.1.3. The Minister for Finance & Personnel recently gave a boost to more sustainable housing when he announced the Executive’s intention to provide rates rebates to existing homes that make energy efficiency improvements and rates exemptions to new zero-carbon housing. The SDC has produced authoritative reports^{vii} on improving the resource efficiency of existing homes, some 75% of which are still likely to be in use by 2050. In Northern Ireland, many of these are very energy-extravagant; a recent Energy Savings Trust report^{viii} claims that household emissions here are 39% above the UK average. In addition to citing inspirational case studies of sustainable retro-fitting projects which address such shortcomings, the SDC’s research has demonstrated that demolition and replacement costs up to 10 times more than refurbishment. Given the budgetary constraints, PSA12 should consider the inclusion of targets for the refurbishment of social housing, rather than relying exclusively on new-build.
- 4.1.4. There will, of course, always be a need for new housing, too. IN GB, there is a promise to legislate to require zero-carbon standards for newly built housing by 2016. The target in PSA12.3 to deliver affordable energy-efficient housing helps to kick-start a similar process in Northern Ireland. However, the next revision of the NI Building Regulations offers a much better opportunity, within the lifetime of this PfG, to embed a zero-carbon ambition, yet it is nowhere referenced. Since homes currently account for over 25% of our carbon emissions, a DFP target to upgrade significantly the current NI Building Regulations should be added to PSA12, thereby contributing to the PfG’s commitment to reduce our carbon footprint and help to tackle fuel poverty (PSA7.4).

4.1.5. PSA2.4 recognises the skills shortage in STEM subjects. The Semple Review and the construction industry itself have both commented on the shortage of the necessary skills and knowledge in modern methods of construction and the use of renewable technologies. An added target in PSA2 is necessary to support skills development as Northern Ireland undertakes an unprecedented programme of infrastructure construction.

4.2. Sustainable Schools

4.2.1. In the 2007 consultation paper, *Sustainable Schools*,^{ix} the Department of Education provided a comprehensive analysis of the future distribution of schools, but it also recorded its intentions to examine sustainable development in schools in a future consultation. The children's agenda is well to the fore in Westminster, with the publication of a strategy known as the Children's Plan^x, which contains far-sighted proposals on green space, road safety and zero-carbon school buildings. This work provides us with an opportunity to build upon it appropriately for Northern Ireland, so PSA10 should include an intention to set out plans for the well-being of children and the environment, as the Department has promised.

4.3. Promoting Health

4.3.1. PSA8.2 includes the ambitious target to halt the rise in obesity by 2011. A recent Foresight report^{xi} posits a considerably longer time-frame, of the order of 40 years, to effect a successful response to the complex problem of obesity. Obesity is linked to social developments and shifts in values, such as changes in food production, transport systems and work patterns, creating what the Foresight report calls an 'obesogenic environment'. Many of the interventions necessary to fight obesity are precisely those of the sustainable development agenda and it is clear that alignment with other major policy issues is vital for success. Tackling obesity is fundamentally an issue about healthy and sustainable living for this and future generations. SDC therefore recommends that PSA8.2 should allocate responsibilities to additional departments to tackle obesity – to DRD for transport matters, to DOE for the parallels with climate change policy and to DARD and NIFSA through DHSSPS in their remit for food policies.

4.3.2. It is accepted that public procurement has a significant role to play in the promotion of sustainability. A specific opportunity exists in the procurement of local food which has implications for targets in both PSA4 and PSA11. Similar projects are already under development in Scotland and Wales and the obvious 'client' departments of DHSSPS and DENI with responsibility for providing food in hospitals and schools, as well as prisons, should collaborate with DFP's procurement professionals and DARD advisors to encourage the wider procurement of Northern Ireland agricultural produce. Such an initiative will derive economic, social and environmental benefits – a classic opportunity for sustainable development in practice.

5. Strategic Considerations of Sustainability in the Pfg

5.1. The NI Sustainable Development Strategy

5.1.1. The Strategy, *First Steps towards Sustainability*, and its attendant implementation plan, *A Positive Step*, have guided the work of the government in its first attempts to promote sustainability across the Departments. It is understood that the Executive may wish to revise the Strategy better to reflect its priorities and PSA11 commits OFMdfM to compile a new version of the Implementation Plan for 2008-2011. It is most important that these revisions do not lose the spirit of the original strategy, nor any of the major targets. SDC will welcome the introduction of SMART outcome-based 'milestones' in the new Implementation Plan, which contribute to longer-term goals set in the strategy. The Commission would also welcome the opportunity to contribute to the development of both the Strategy and Implementation Plan.

- 5.1.2. There are several complementary initiatives that support the delivery of sustainable development. Two of them, the Communications Strategy and the introduction of a statutory duty, are specifically included in PSA11. However, there is no similar mention of the training programme that is so critical to PSA11.3, the delivery of the sustainable development strategy. OFMdfM has the specific responsibility for implementing sustainable development across NICS departments and the wider public service. Realistically, this is only possible through a comprehensive advocacy and training programme, to win the understanding and commitment of colleagues across the service. PSA11 should therefore contain a specific target to devise and implement a sustainable development training programme for the NICS.
- 5.1.3. Another omission is any mention of the suite of indicators of sustainable development. These provide the means through which to measure the success of the PFG's requirement for sustainability in its policies and programmes. PSA11 should have a target to publish the SD indicators.

5.2. Sustainable Procurement

- 5.2.1. SDC welcomes the inclusion of the targets relating to public procurement in PSA11.4. There may be some duplication in target 3 and target 5, but the commitment to training is laudable. A sustainable procurement action plan is currently in preparation by CPD; a target on its implementation would be a useful addition at PSA11.4

5.3. Stakeholder Engagement

- 5.3.1. The promotion of good governance is one of the underpinning principles of the NI Sustainable Development Strategy. At the heart of good governance is the need to engage the public and stakeholders systematically, a process which deepens the understanding and commitment of both decision-makers and participants. As more so-called 'wicked issues' rise up the political agenda – and sustainability is an obvious case in point – it will be ever more critical to have the tools to deal with complex debate and develop acceptable solutions. The creation of the NI SD strategy constitutes an example of good practice in this regard and SDC can offer specific expertise and experience to assist further with effective policy-making.

5.4. Public Service Agreements

- 5.4.1. The PSA framework provides the means by which the government can monitor its own performance against the PFG. However, not all of the targets in the PSAs are capable of being objectively measured. Perhaps suitable indicators are to be embedded within each Departmental business plan but it is in the promotion of cross-Departmental working that the PSAs have particular value, not least in terms of promoting sustainable development; it would therefore be beneficial to see indicators for each PSA.

ⁱ <http://www.carbontrust.co.uk/Publications/publicationdetail.htm?productid=CTC520&metaNoCache=1>

ⁱⁱ http://www.cpdni.gov.uk/sustainability_action_plan.pdf

ⁱⁱⁱ http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/sternreview_index.cfm

^{iv} http://www.hm-treasury.gov.uk/newsroom_and_speeches/press/2007/press_143_07.cfm

^v <http://www.dsdni.gov.uk/index/hsdiv-housing/hsdiv-housing-affordability.htm>

^{vi} <http://www.dcalni.gov.uk/index/architecture.htm>

^{vii} <http://www.sd-commission.org.uk/publications.php?id=400> <http://www.sd-commission.org.uk/publications.php?id=570>

^{viii} <http://www.energysavingtrust.org.uk/>

^{ix} <http://www.consultationni.gov.uk/sustainableschools.pdf>

^x <http://www.dfes.gov.uk/publications/childrensplan/>

^{xi} <http://www.foresight.gov.uk/Obesity/Obesity.html>