



Belfast City Council.

Report to:	Strategic Policy and Resources Committee.
Subject:	Consultation on the Northern Ireland Sustainable Development Strategy draft Implementation Plan.
Date:	22 October 2010.
Reporting Officer:	Mrs. Suzanne Wylie, Director Health and Environmental Services (ext. 3260).
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Relevant Background Information.

On 27 May 2010, the Northern Ireland Executive published a second Sustainable Development Strategy entitled 'Everyone's Involved'. In doing so, the Executive determined that the Strategy should function as a high-level, enabling document to be used to inform the decisions and actions of those groups progressing the sustainable development agenda across Northern Ireland. Within Northern Ireland, responsibility for sustainable development rests with the Office of the First Minister and Deputy First Minister (OFMDFM).

Within the Strategy document, the Executive identified a range of organisations that have a critical contribution to make towards sustainable development, including district councils. By way of amplification, the Strategy refers to the local authority statutory duty to promote sustainable as articulated via Section 25 of the Northern Ireland (Miscellaneous Provisions) Act 2006, which requires councils to exercise their functions in the manner best calculated to promote the achievement of sustainable development.

The Strategy contains also a range of priority areas for action as follows:-

1. Building a dynamic innovative economy that delivers the prosperity required to tackle disadvantage and lift communities out of poverty.
2. Strengthening society so that it is more tolerant, inclusive and stable and permits a positive progress in the quality of life for everyone.
3. Driving sustainable long-term investment in key infrastructure to support economic and social development.
4. Striking an appropriate balance between the responsible use and protection of our natural resources in support of better quality of life and a better quality environment.
5. Ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint.
6. Ensuring the existence of a policy environment that supports the overall advancement of sustainable development in and beyond government.

In order to ensure an appropriate commitment towards these priority action areas, OFMDFM has developed a supporting Implementation Plan, outlining specific actions to be taken by central government departments, local authorities and a range of other non-governmental organisations.

The Strategic Policy and Resources Committee is advised that the draft Implementation Plan, which has been issued for consultation, is not a finished document but instead comprises a detailed list of individual actions presented in spreadsheet format. OFMDFM has indicated that this is an interim arrangement, designed to stimulate discussion around what the final Implementation Plan should contain. Accordingly, OFMDFM has requested that consultees consider the suitability of actions to be undertaken by government departments, district councils and non-governmental bodies. In addition, consultees have been invited to propose metrics for measuring progress towards sustainable development.

OFMDFM has requested that consultee comments be forwarded using a standardised response template and has advised that they are to be received by 29 October 2010.

Key Issues.

In order to ensure that the local government contribution is recognised appropriately within the Implementation Plan, Solace and NILGA requested that the Council's Sustainable Development Manager represent all 26 Councils on the Ministerial led Sustainable Development Strategy Implementation Plan Steering Group.

The Steering Group is an informal and ad-hoc high-level forum, under the joint chairmanship of Junior Ministers from within OFMDFM, which is charged with facilitating the implementation of the sustainable development priorities identified in the Sustainable Development Strategy and Programme for Government. The Steering Group advises on the structure and prioritisation of sustainability targets and provides a channel of communication to stakeholders. The Steering Group is also tasked with assisting the concept of sustainable development to achieve a higher profile in the wider community.

In addition, a high-level summary of sustainable development initiatives was sought from each local authority for inclusion within the draft Implementation Plan. Although this approach has not generated significant additionality, the actions submitted constitute, nonetheless, the current district council contribution towards the Implementation Plan. A district council facilitated consultation event was provided by OFMDFM on 28 September in order to raise awareness of, and refine the draft Implementation Plan.

Due to the manner of its development, the draft Implementation Plan is quite complex in its presentation, containing around 33 indicative actions across the 6 priority action areas. Not all are of relevance to local government. Accordingly, this consultation response does not seek to consider all 33 actions but rather address those highlighted as deficient by Council Departments. The 33 indicative actions have been included in Appendix B for information.

The Council's proposed consultation response is detailed in Appendix A.

Resource Implications

Financial / Human Resources.

There are no immediate financial implications associated with the district council obligations proposed within the Sustainable Development Implementation Plan.

Asset and Other Implications.

The OFMDFM proposal to enable public authorities to take into account sustainable development legislative requirements in the exercising of their functions may result in the Council having eventually to '*sustainability proof*' its policies and actions in order to demonstrate compliance with the statutory duty.

Recommendations

The Committee is invited to endorse the attached response in respect of the draft Sustainable Development Strategy Implementation Plan and to recommend that it be forwarded to the Sustainable Development Unit, Office of the First Minister and Deputy First Minister by the consultation closing date of 29 October 2010.

At the time of submission, the Sustainable Development Unit will be advised that the comments are subject to Council ratification at its meeting of 1 November 2010.

Key to Abbreviations

OFMDFM	Office of the First Minister and Deputy First Minister.
NILGA	Northern Ireland Local Government Association.
Solace	Society of Local Authority Chief Executives.

Documents Attached.

Appendix A –	Belfast City Council Consultation Response to the Northern Ireland Sustainable Development Strategy Implementation Plan.
Appendix B -	Sustainable Development Implementation Plan Indicative Actions.

Appendix A.



Belfast City Council Consultation Response to the Northern Ireland Sustainable Development Strategy Implementation Plan.

Priority Area for Action 2: Strengthening society so that it is more tolerant, inclusive and stable and permits positive progress in quality of life for everyone.

2.2 Increase the sustainability standards of social housing.

Comments on Government Actions and metrics:

It is recommended that the Department of Social Development adopt the Housing Health and Safety Rating system as the standard for assessing the fitness/suitability for occupation for both their properties and also the rented sector (to include the private rented sector). It is considered that the current assessment standard is archaic and does not promote sustainability in dwellings. The Housing Health and Safety Rating system is a scientific risk based assessment, which requires landlords to address a range of issues in dwellings affecting occupants. More information about the Housing Health and Safety Rating System can be accessed via the following web links:-

<http://www.legislation.gov.uk/ukxi/2005/3208/contents/made>

<http://www.communities.gov.uk/documents/housing/pdf/142631.pdf>

Priority Area for Action 4: Striking an appropriate balance between the responsible use and protection of natural resources in support of a better quality of life and a better quality environment.

4.6 Take action to halt biodiversity loss.

Comments on Government Actions and metrics:

It is recommended that the biodiversity aspects of the Implementation Plan be aligned with both national and International targets for the protection of biodiversity. For example, earlier this year, the European Union agreed a new long-term vision and mid-term headline target for biodiversity in the EU for the period beyond 2010, when the current target expires. The new target is 'to halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, restore them in so far as feasible, while stepping up the EU contribution to averting global biodiversity loss'. There is no mention of ecosystem services within the Implementation Plan, however, these are considered to be a critical contributor towards achieving the EU target. In addition, there appears to be no reference to the Northern Ireland Biodiversity Strategy.

It is considered that ecosystem services, such as the role of soil processes in the carbon cycle and linkages to international obligations on carbon should be included within sustainable land management aspects of the plan. An opportunity exists also to include the development of Biodiversity Implementation Plans as an action for district councils. Targets for priority habitats and species and favourable conservation status of designated sites should be included within the Department of Environment section.

Invasive species are the second biggest threat to biodiversity. Currently, there is no primary legislation in relation to invasive species in Northern Ireland. The current provisions within the Wildlife Order 1985 and the proposals within the Wildlife and Natural Environment (Northern Ireland) Bill 2010 are considered inadequate to prevent further incursion of invasive species and enforce control measures.

It is considered that primary legislation is required to address the ingress of invasive species.

Finally, it is disappointing to note that the Department of Environment has proposed no actions in relation to education on biodiversity.

Priority Area for Action 5: Ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint.

5.1 Reduce greenhouse gas emissions.

Comments on Government Actions and metrics:

At present, it has been estimated that the Northern Ireland public sector spends around £150M annually on energy for its premises (Invest NI publication). In order to ensure that organisations make appropriate financial provisions to support the delivery of energy conservation measures, the Carbon Trust has recommended that at least 10% of an organisation's energy budget be set aside annually for energy conservation projects, which would result in typical Northern Ireland expenditure of around £15 million.

Since the mid 1980s, energy consumption by Northern Ireland public organisations has been monitored annually by the Department for Finance and Personnel (DFP) against an agreed set of targets. Over the years, these targets have evolved in line with changing environmental priorities and other policies. The current targets for the Public Sector estate were established as a result of the 1999 Climate Change Programme, which embodied the agreements contained in the Kyoto Protocol, and the 2003 Energy White Paper "Our Energy Future – creating a Low Carbon Economy". They are summarised as follows:-

- To increase the energy efficiency of the buildings on public sector estates measured in terms of kiloWatt-hours (kWh) of fuel and electricity used per square metre of building floor area by 15% by 2010/11, relative to a base year of 1999/2000;
- To reduce absolute carbon, from fuel and electricity used in buildings by 12.5% by 2010/11, relative to a base year of 1999/2000; and
- To reduce electricity consumption across the estate by 1% annually from 2007 to 2012 against the base year of 2006/07

The DFP Central Energy Efficiency Fund (CEEF) was established in 1993 to provide financial support through grants for energy (and latterly carbon dioxide) saving measures, which could not be financed from within Departmental budgets. The fund was extended later to the wider public sector estate in Northern Ireland. Applications to the CEEF are assessed by the Public Sector Energy Working Group (PSEWG). The PSEWG is independently chaired and comprised of representatives from a number of Departments, a member of the District Council Energy Managers' Forum and independent technical advisers.

During 2010/2011, the CEEF has made available £1M in funding to support energy conservation projects however, the fund has been heavily oversubscribed by public bodies. In addition, it should be noted that funding to Councils is offered on a 50% matched funding basis. Accordingly, DFP is encouraged to review the amount of funding available in the context of Carbon Trust recommended levels of expenditure. Due to the level of subscription, only a small number of councils choose to submit an application to the fund each year. Moreover, few are likely to be successful since grants are awarded based upon carbon savings and payback periods. Therefore, a large number of beneficial projects are not taken forward by councils because funding cannot be secured 'in house'. Furthermore, the details of the projects that are selected for grant funding are not made public, making it difficult for unsuccessful applicants to improve the quality of their submissions. It is recommended, therefore, that the assessment process should be made more transparent.

It is recommended also that the remit of the Public Sector Energy Campaign should be expanded to encourage closer working with Councils in order to disseminate knowledge on developing PSEC funding applications and information about other sources of funding and government incentives. This approach would help to raise awareness of the need for energy conservation amongst councils and assist them to develop suitable funding applications. It is considered that a more co-ordinated

approach across the public sector could prevent money being spent on numerous energy efficiency and renewable energy feasibility studies.

The Department of Finance and Personnel has indicated that many Northern Ireland councils do not submit annual energy consumption reports. It is considered that clearer district council energy conservation targets, supported by appropriate sanctions, would ensure that all councils to address energy conservation and begin to make appropriate financial provisions.

At present, Belfast City Council is the only Northern Ireland council required to participate fully in the Department for Energy and Climate Change (DECC) Carbon Reduction Commitment Energy Efficiency Scheme (CRC EES), although a range of other large public sector bodies are involved. In order to encourage greater energy conservation, government has indicated that it intends to publish a performance league table of organisations participating in the CRC EES. It is considered that the Department for Finance and Personnel could adapt this approach to develop a Northern Ireland public sector energy conservation league table. By way of amplification, the recent Northern Ireland Assembly Committee for the Environment Council Questionnaire seeks to identify what energy efficiency actions councils have implemented in terms of renewable technologies, investment in energy conservation and carbon savings. It is considered that the outcome of this survey could be used to inform the 'reducing our carbon footprint' section of the draft Sustainable Development Implementation Plan.

Priority Area for Action 6: Ensuring the existence of a policy environment that supports the overall advancement of sustainable development in and beyond Government.

6.4 Enable public authorities to take into account sustainable development legislative requirements in the exercising of their functions.

Comments on Government Actions and metrics:

Belfast City Council has recognised already the benefits of delivering its functions and services in a sustainable manner. By way of example, the Council's current Corporate Plan 2008-2011 commits us to act sustainably through the effective and efficient use of all our resources and promotion of the principle of sustainability in all our activities. Moreover, the overarching objective of our Corporate Value Creation Map is for the Council to 'take a leading role in improving quality of life now and for future generations for the people of Belfast by making the city a better place to live in, work in, invest in or visit'.

Although Belfast City Council incorporates sustainable development as a key component in its forward planning, it believes strongly that the Sustainable Development Implementation Plan needs to identify explicitly financial resources to assist with the implementation and delivery of the proposed plan actions. The Council considers that this would be the single most effective way to link high-level objectives to the delivery of district council plans.

It is noted that Section 25 of the Northern Ireland (Miscellaneous Provisions) Act 2006 requires a public authority, in exercising its functions, to act in the way it considers best calculated to contribute to the achievement of sustainable development in Northern Ireland, except to the extent that it considers that any such action is not reasonably practicable in all the circumstances of the case. For the purposes of the legislation, a public authority is defined presently as a Northern Ireland department or a district council although the legislation provides for the Office of the First Minister and Deputy First Minister to prescribe other persons as required.

To date, no formal guidance has been issued explaining how public authorities can comply with the duty. Accordingly, the Council invites the Office of the First Minister and Deputy First Minister to engage, as a matter of priority, with all local authorities regarding the statutory duty and the development of supporting guidance. The Council recommends further that should the Office of the First Minister and Deputy First Minister introduce a requirement for sustainability screening in order to demonstrate compliance with the duty, only significant local authority policies or functions should need to be appraised. Finally, the Council recommends that any compliance reporting mechanism should be straightforward and proportionate.

In considering mechanisms for assessing progress towards sustainable development, the Office of the First Minister and Deputy First Minister may wish to refer to the Department for Environment, Food

and Rural Affairs (DEFRA) 'Stretching the Web' toolkit which has been derived from the Better Regulation Executive Impact Assessment methodology.

(<http://www.defra.gov.uk/sustainable/think/stretch/demo.htm>)

A similar approach to sustainability proofing has been proposed by the European Union via its 'Reference Framework for European Sustainable Cities', which incorporates the provisions of the "Leipzig Charter on Sustainable European Cities" in order to improve policy-making on integrated urban development, with a particular focus on deprived neighbourhoods. Belfast City Council has submitted recently an application to participate in the testing of this new Reference Framework for Sustainable European Cities with a view to integrating more fully the principles of sustainable development into our everyday working practices and activities. More information about the Reference Framework for Sustainable European Cities can be accessed via the following web link:-

(<http://www.rfsustainablecities.eu/>)

These comments apply also to actions proposed by the Office of the First Minister and Deputy First Minister within section 6.2 - Operate within identified and agreed best practice guidelines for sustainable development.

Other Comments.

General comments regarding the Sustainable Development Implementation Plan format.

Whilst the inclusion of Departmental and Northern Ireland Government Association actions within the draft action plan is 'self-selecting', the rationale for the choice of non-governmental organisations is unclear. With the exception of the Rural Community Network, all other non-governmental groups (Northern Ireland Environment Link, Carbon Trust, Royal Society for the Protection of Birds, etc.) are ostensibly environmental in nature, resulting in an under representation of the social and economic aspects of sustainable development from this sector.

It is considered that the mechanism, by which the draft Implementation Plan has been developed, i.e. detailed lists of actions submitted by government departments, local authorities and non-governmental bodies has limited the potential for creating an integrated cross-sectoral approach to sustainable development.

Moreover, as the priority action areas have been defined largely from the perspective of central government departments' outward-facing responsibilities, it may prove difficult for non-departmental bodies to identify effective actions that relate directly to these priorities.

It is noted that within the Sustainable Development Strategy, the Executive has committed to the development of SMART (specific, measurable, aligned, realistic, and time-bound) targets in order to measure progress towards sustainable development and to facilitate inter-departmental discussion on issues of mutual interest. At present, however, the draft Implementation Plan contains only a limited number of measurable actions. Indeed, many of the 'objectives' listed appear to be elaborations on the sub-priorities (e.g. 'to promote', 'to seek to ensure', 'to continue to maintain', etc.) without commitment to measurable outcomes. Consequently, Belfast City Council recommends, that in developing the final Implementation Plan, Departmental and other actions are presented in a format that enables performance management to be implemented.

In addition, it is considered that the approach of developing metrics after a full range of activities have been agreed may not be the most favourable method for advancing sustainable development. A more appropriate approach might have been to define a set of overarching, critical indicators for sustainable development and then determine what actions would be required across all government Departments and other sectors to contribute towards these indicators.

Although development of the draft Sustainable Development Strategy Implementation Plan is being led by the Sustainable Development Strategy Implementation Plan Steering Group that draws its membership from a range of organisations from across the social, economic and environmental sectors, the permanence of this group is uncertain once the Implementation Plan has been finalised. In order to ensure that sustainable development continues to gain prominence across all sectors, it is recommended that the Office of the First Minister and Deputy First Minister includes a commitment to the formation of an OFMDFM led Sustainable Development Forum for Northern Ireland within Priority

Area for Action 6 - Ensuring the existence of a policy environment which supports the overall advancement of sustainable development in and beyond Government.

General comments regarding district council contributions.

The method of developing the draft Implementation Plan has caused district council contributions, in some cases, to be presented as a list of individual council actions, rather than a series of local authority shared objectives. In developing the format of the final Implementation Plan, there may be an opportunity to rationalise the extensive list of district council actions in order to form a smaller series of 'generic' sustainable development activities to which all councils can subscribe. This set could include, for example, the development and implementation of Environmental Management Systems such as ISO14001:2004, Community Planning, sustainable development action planning, the construction or refurbishment of Council premises to BREEAM (Building Research Establishment Environmental Assessment Method) standards and limiting the amount of waste that is disposed off to landfill, etc.

As with central governmental departments, there may be a need to distinguish between actions that are a general statement of existing council responsibility and specific actions for improvement.

In addition, it is considered important that appropriate resources are deployed by district councils in order to ensure progress towards sustainable development.

Appendix B.

Sustainable Development Implementation Plan Indicative Actions

- 1. Building a dynamic, innovative economy that delivers the prosperity required to tackle disadvantage and lift communities out of poverty**
 - 1.1 Increase the number of jobs in the low-carbon economy.
 - 1.2 Increase the energy efficiency and resource efficiency of businesses.
 - 1.3 Ensure that our provision of learning and skills responds to the needs of the low-carbon economy

- 2. Strengthening society so that it is more tolerant, inclusive and stable and permits positive progress in quality of life for everyone.**
 - 2.1 Reduce deprivation and the incidence of social exclusion and poverty, especially child poverty and increase opportunities for all children and young people, particularly the most disadvantaged, to reach their full potential.
 - 2.2 Increase the sustainability standards of social housing.
 - 2.3 Promote and improve the health and well-being of the whole population through the effective implementation of current and planned supporting strategies and partnership working.
 - 2.4 Extend the implementation of sustainable development within all schools and other educational establishments.
 - 2.5 Improve quality of life through experiencing, participating in and accessing cultural and sporting pursuits.
 - 2.6 Increase volunteering within communities.
 - 2.7 Improve community cohesion, sharing and integration and increase the proportion of the population reporting a positive perception of the community in which they live.

- 3. Driving sustainable, long-term investment in key infrastructure to support economic and social development.**
 - 3.1 Reduce deprivation and the incidence of social exclusion and poverty, especially child poverty and increase opportunities for all children and young people, particularly the most disadvantaged, to reach their full potential.
 - 3.2 Ensure that all of our activity in physical regeneration and new infrastructure investment meets sustainable development objectives.
 - 3.3 Ensure an integrated and accessible transport infrastructure that promotes economic growth and social inclusion across all areas while reducing emissions and adverse impacts.
 - 3.4 Provide modern, sustainable accommodation for educational establishments.
 - 3.5 Provide an infrastructure capable of facilitating the delivery of modern, sustainable, high-quality health and social care services and fire and rescue services.
 - 3.6 Provide, maintain and regulate the infrastructure necessary to deliver high quality water and sewerage services and acceptable levels of compliance with EU and other relevant standards.
 - 3.7 Increase the number of households and businesses with access to broadband, particularly among rural and disadvantaged groups.

- 4 Striking an appropriate balance between the responsible use and protection of natural resources in support of a better quality of life and a better quality environment.**
 - 4.1 Ensure an appropriate policy and legislative framework is in place supported by a regulatory regime, which will deliver statutory environmental standards in respect of air, water and other environmental pollution.
 - 4.2 Promote sustainable land management
 - 4.3 Promote sustainable marine management.
 - 4.4 Ensure our built heritage is used in a sustainable way.
 - 4.5 Improve the quality of life of our people by planning and managing development in ways which are sustainable and which contribute to creating a better environment.
 - 4.6 Take action to halt biodiversity loss.
 - 4.7 Reduce the total quantity of waste going to landfill.

5 Ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint.

- 5.1 Reduce greenhouse gas emissions.
- 5.2 Increase the proportion of energy derived from renewable sources.
- 5.3 Implement energy efficiency measures, particularly for vulnerable groups.
- 5.4 Increase energy security.
- 5.5 Adapt to the impacts of climate change.

6. Ensuring the existence of a policy environment that supports the overall advancement of sustainable development in and beyond Government.

- 6.1 Communicate Government policy on sustainable development.
- 6.2 Operate within identified and agreed best practice guidelines for sustainable development.
- 6.3 Exercise legislative functions, in and beyond Government, in support of sustainable development.
- 6.4 Enable public authorities to take into account sustainable development legislative requirements in the exercising of their functions.