



*Working together for a healthier Belfast*

## **Response to Sustainable Development Implementation Plan**

October 2010

Belfast Healthy Cities welcomes the opportunity to comment on the Sustainable Development Implementation Plan

Belfast Healthy Cities is a partnership organisation working to improve the health and wellbeing of people in Belfast and beyond, by improving the conditions in which people live, work and play. Belfast is also a leading WHO European Healthy City, which involves formal commitment to improving health from the city and key public agencies. Key partners include Belfast City Council, Public Health Agency, Belfast HSC Trust, Northern Ireland Housing Executive, Planning Service, Bryson Group and Queen's University of Belfast.

The key aim of Belfast Healthy Cities is to integrate health and health equity in all local policies. Belfast Healthy Cities was also instrumental in establishing the regional Climate Change and Health group, which is chaired by DHSSPS and facilitated by us. The work of the group focuses on building the health sector's capacity to take action on climate change and facilitating action, by piloting models of good practice. A key area of work is also healthy urban environments and design, where we work to strengthen understanding of how the physical environment influences health and support the development of policy and action on the built environment that also supports health.

This response provides a general comment on the implementation plan and issues within it. Therefore, we have chosen to submit a freestanding response, focusing on the broad consultation questions. We also enclose two relevant publications: *Healthy Places – Strong Foundations*, which outlines the synergies between improving the built environment, supporting the natural environment and strengthening health, and *Climate Change and Health: Impacts, Inequalities and Action*. This publication will be launched by the Minister for Health, Social Services and Public Safety in early November, and outlines action that the health sector can take to deal with climate change. We would be pleased to expand on any points included in the response, should that be helpful.

### **Comments on identified action**

Belfast Healthy Cities welcomes the broad outline of proposed action and the open approach to consultation. Sustainable development is by definition a cross cutting issue, and to achieve results it must be embedded in the principles, policies and

actions of organisations in all sectors. It must also be given priority, as results can only be achieved by actively assessing and where necessary altering existing practice.

The draft implementation plan matrix is very detailed and provides a very helpful insight into how sustainable development is viewed across Departments, and those non governmental organisations that have been included. Nevertheless, we note that the plan mostly consists of existing action. Indeed, it might be better described as an overview of current practice, or a baseline.

This can in itself be helpful, since a baseline is needed for monitoring change. Existing good practice is also important as a basis for future action. However, it is not clear to what extent the ongoing action outlined in the plan has been evaluated as effective, and this makes it more difficult to assess the potential for achieving outcomes in line with the identified objectives.

More significantly, in many cases the actions identified by Departments are more like objectives or intentions, rather than concrete action with specified aims, outcomes and timescales. This is a concern, since it is likely to make monitoring of change and commitments rather difficult. It is important that the final implementation plan incorporates detailed, preferably SMART action that helps OFMdFM and others follow up on progress. If necessary, more detailed action can be outlined under the more general descriptions currently given.

It would also be helpful if the plan provided a 'roadmap' of key steps and elements required for achieving the intended outcome. In particular, it would be helpful if the roadmap provided a framework indicating how action and objectives in different areas link together, eg. how more sustainable travel supports health, and contributes to social inclusion, while reducing carbon emissions, or how renewable energy and energy efficiency links to improved energy security.

This would make it easier to identify priorities, and also help people understand how action on different levels and in different sectors contributes to a greater whole.

### **Comments on metrics**

Another key issue is that while the Sustainable Development Strategy incorporates a significant number of strategic objectives and commitments, there is no overarching outcome or target proposed for the implementation plan or the priority areas; there is also no defined timespan for the plan. We recognise that the consultation seeks comments on metrics for measuring progress on the strategic objectives; however, it is difficult to identify potentially suitable indicators as intended outcomes and targets are missing. We find it essential that these are included in the final implementation plan. We would also suggest that targets and indicators should be established first, rather than after the range of action is identified, as we believe that the objectives and indicators should determine the direction of action and not vice versa.

In relation to indicators, we would recommend reviewing the sustainable indicators used in England (<http://www.defra.gov.uk/sustainable/government/progress/>), as these are comprehensive, evidence based and already validated. Reflecting this set would also enable comparison of progress with England, which would be helpful in particular in identifying relative strengths and weaknesses. It might be important to note that this indicator set has been retained, at least for the time being, by the coalition government.

### **Comments on co-ordination and ownership**

We recognise that overall responsibility for the strategy and implementation plan lies with OFMdfM; the roles of the Department are well outlined in the commitments given in the strategy. We would suggest, however, that the strategy has greatest potential to achieve its aims if all Departments have ownership of it and can see how delivering it has synergies with or supports their individual core aims. To achieve this, it would be important to establish a mechanism for sharing responsibility for leading and steering the strategy and action, and supporting Departments to identify synergies.

An added advantage of – for example - a joint forum or cross sectoral steering group – could be that it would provide a platform for identifying opportunities for shared action or collaboration. Due to the cross cutting nature of sustainable development, Belfast Healthy Cities believes that intersectoral collaboration is vital for achieving lasting outcomes; we also believe that action involving a number of sectors provides best value for money in an effective manner. In terms of presentation, it would be helpful to specifically highlight collaborative cross sectoral action, as this helps illustrate the cross cutting nature of the task and the complementary role of different agencies.

It would be helpful if the plan incorporated statements from each Department on how they view sustainable development and how it links to their core aims and activities. This would create an important supporting context to the current overview of existing work and also help assess over time to what extent sustainable development becomes embedded in Departments' corporate plans.

### **Comments on action by non governmental organisations**

Belfast Healthy Cities is pleased that the implementation plan recognises the role that non governmental organisations can play for sustainable development. We would, however, welcome clarification on how the selection of agencies included was made. We would also suggest that NILGA has a more formal role as a representative for Councils, which play a very significant role for sustainable development, and that this section for that reason should be expanded along the same lines as action by Departments.

The community and voluntary sector makes a significant contribution to sustainable development, both directly and indirectly. It is important to fully recognise this contribution in the implementation plan, and it would be useful to outline a concrete

mechanism that ensures the sector can contribute to delivery of the strategy. We would suggest that funding mechanisms, including contracting out specific pieces of work, should be reviewed as one option, while ensuring representation from relevant agencies in Department led projects is another. Indeed, we believe that key agencies should be involved in the overall monitoring of the strategy and plan, as they will be able to contribute a valuable additional and independent perspective, including formal expertise as well as views, needs and feedback from citizens and agencies working in the frontline.

### **Comments on additional action**

We welcome the opportunity for consultees to identify potential new action, as we see the plan as significant opportunity to analyse what needs to be done to deliver a more sustainable future for Northern Ireland. In the view of Belfast Healthy Cities, incremental change to current practice alone is not sufficient to tackle the challenges we are facing; it is also necessary to identify additional action, and new ways of doing things.

As noted above, we believe that the analysis of what else needs to be done could be supported by a framework, which outlines how different actions/objectives complement each other, and how objectives at more operational level (eg. implement energy efficiency measures, priority action area 5; ensure an integrated and accessible transport infrastructure and promote active travel, priority action area 3) contribute to more strategic objectives (eg. reduce greenhouse gas emissions, priority action area 5 and increase the number of jobs in the low carbon economy, priority action area 1).

Finally, we believe it would be important to introduce a mechanism for assessing the sustainability impacts of proposals, as this would provide a consistent way of considering sustainability in decision making across sectors.. Sustainability appraisal, currently widely used in Britain, is one option for this; again an advantage of this would be increasing alignment and drawing on existing good practice in the field. Belfast Healthy Cities has considerable experience in health impact assessment, which also has a key advantage in that it focuses on impacts on people and their living environment, and emphasises differential impacts on vulnerable groups, which may jeopardise social sustainability. We are exploring opportunities to integrate health into sustainability appraisal; this work is at a very early stage, but we would be happy to discuss this further with OFMdFM and other relevant stakeholders.

From a health and wellbeing perspective, the two publications enclosed with this response outline a range of action that would support health as well as sustainable development. Examples of action that are not currently in the implementation plan include:

- Strengthen active travel infrastructure and create incentives for choosing active travel and public transport, for example by
  - Providing safe crossing points at desired locations

- Linking footpaths and cycle lanes to public transport hubs and linking public transport to key trip generators (eg. shopping centres, hospitals)
- Developing workplace travel plans
- Controlling parking provision
- Developing more flexible and integrated ticketing
- Safeguard green space and increase accessibility
  - Support the development of community gardens
  - Protect playing fields and explore opportunities for wider usage
  - Encourage use of parks and forests as outdoor classrooms
  - Support and promote the development of greenways and green corridors
  - Explore opportunities to use vacant land as temporary greenspace
- Strengthen sustainability of land use
  - Promote mixed land use and greater density
  - Integrate and enforce sustainability criteria in the planning process
  - Co-ordinate physical and social regeneration, eg. strengthen training provision to improve ability of local residents to take up jobs created
  - Promote flexibility in urban design and support creative reuse as well as retrofit of existing building
- Strengthen resilience and emergency preparedness
  - Conduct flood health risk assessments as part of flood preparedness
  - Enhance availability of support services to flood victims, in particular mental health support
  - Support and promote community development and local capacity building
  - Support small business start ups and social enterprise