



Response to draft Programme for Government 2011-15 Office of the First Minister and Deputy First Minister

February 2012

Belfast Healthy Cities welcomes the opportunity to comment on the draft Programme for Government (PfG) 2011-15. We would be happy to expand on any points made in this submission, should that be helpful.

The key points of this submission are:

- **The emphasis on a healthy and well educated population as the foundation for a prosperous society is to be welcomed.** This provides a basis for cross sectoral action, and is in line with the forthcoming WHO Europe policy Health 2020, which identifies investment in health as an investment in economic and social development.
- **The focus on tackling disadvantage is to be welcomed, but there should be a stronger emphasis on an integrated framework to strengthen equity in health.** There is little evidence that economic growth alone will reduce inequalities significantly, and therefore a framework based on an understanding of the reasons for disadvantage, incorporating actions into a value added whole, would be very important to ensure maximum impact.
- **There should be a stronger emphasis on sustainability.** Despite making sustainability a stated cross cutting issue, there is limited specific action aimed at promoting this.
- **Significant benefits can be achieved by exploring the full range of impacts action on sustainable development can have.** In many cases, action that supports the environment also benefits health and wellbeing, with additional benefits for the economy. For example, making sustainable energy a focus for economic development can create jobs and contribute to creating world class innovation and expertise in Northern Ireland.
- **Green space and sustainable energy** offer key potential areas for synergies across sectors and should be emphasised more.
- **Food is a key gap**, again with potential benefits for health as well as the economy and environment. Procurement can play a key role in improving access to and encouraging production of healthy food.

- **Further detail on the implementation schedule around planning would be helpful to create certainty.** It is of concern that the draft PfG appears to prioritise economic issues in planning, as this risks inadequate consideration of potentially costly long term impacts. At minimum, it would be important that the intention of this action is clarified, and that it is explicitly stated that job creation is understood in the widest sense.
- **Focus should be on achieving outcomes.** Monitoring should prioritise this, in particular clarifying how specific actions contribute to the overall objective(s), and place less emphasis on process. Indicators chosen need to be based on evidence; new data may be required to gain effective knowledge. The Scottish framework 'Scotland Performs' may be a helpful reference (see <http://www.scotland.gov.uk/About/scotPerforms/outcome>).
- **More specific milestones and outputs would be helpful.** While it may be difficult to set exact targets, where possible milestones should be measurable to help monitor progress.
- **Targets must be challenging but achievable.** This will not only avoid negative publicity, but support the morale and consequently productivity of professionals tasked with delivering action at all levels. Equally, it is important not to avoid targets completely, as they are necessary to enable monitoring of progress

Introduction

Belfast Healthy Cities is a citywide partnership whose vision is of a healthy, equitable and vibrant city where all sectors provide individual and shared leadership, enabling citizens to achieve their full potential. Belfast is a leading World Health Organization (WHO) Healthy City, and the Belfast Healthy Cities' office provides a direct link to WHO. As the current secretariat of the WHO European Healthy Cities Network, Belfast Healthy Cities also has direct links to over 90 other European Healthy Cities.

The role of the partnership is, through our leadership and innovation, to inspire and utilise the collective and individual strengths of partners to *deliver the WHO European Healthy City* goals and requirements and maximise their impact on health and inequalities. The focus of the global Healthy Cities movement, including ours, is on the wider physical and social living conditions that shape health and wellbeing, and creating conditions that support health and tackle inequalities.

Our key areas of work include Healthy Urban Environment, including climate change and health, and Health Equity in All Local Policies. Our work focuses on developing new programmes, piloting innovative concepts, capacity building and collating and sharing evidence. We have a track record of delivery and our work has influenced



developments including the Investing for Health Strategy, the Belfast Strategic Partnership, the intersectoral Healthy Ageing Strategic Partnership in Belfast and emerging regional and local active travel policy and practice. The approach is also reflected in the Planning Act (Northern Ireland) 2011, to which Belfast Healthy Cities submitted evidence highlighting how land use plays a vital role in setting the context for health and wellbeing.

Our comments will reflect this broad standpoint.

General comments

Belfast Healthy Cities is pleased that the draft PfG contains a recognition that a healthy, well educated population is the foundation of a peaceful and prosperous society. This echoes the WHO standpoint, emphasised in the forthcoming Health 2020 policy, that investment in health and wellbeing is investment in social and economic development. It also indicates an understanding that health is shaped by a broad range of determinants, and provides a platform for promoting and developing cross Departmental policy and action, which is crucial for achieving outcomes effectively.

Similarly, the greater focus given on tackling disadvantage is to be welcomed. This gives a new and helpful basis for dialogue with decision makers, and a rationale for highlighting equity implications of policies and decisions. However, it is of some concern that, in continuation from PfG 2008-11, economic growth is seen as the primary means for tackling disadvantage. Belfast Healthy Cities stresses that there is very limited evidence of such a trickle down effect; indeed, research on economic change in Britain throughout the growth years of the late 1990s and early 2000s show that inequality in fact increased.¹ There is similar evidence from the US, spanning recent decades².

In short, while access to jobs is a vital part of tackling poverty, economic growth is not enough on its own to reduce disadvantage, since the relative incomes of the more affluent rise considerably faster, increasing inequality. In line with the recommendations of the WHO Global Commission on the Social Determinants, and the subsequent Marmot review of health inequalities in England post 2010, Belfast Healthy Cities would like to see a greater emphasis on the following:

- **Improving daily living conditions**

In particular access to education and an emphasis on early years, including support for families, is important for a sustainable approach to strengthening

¹ *An Anatomy of Economic Inequality in the UK: Report of the National Equality Panel* (2010). London: Government Equalities Office and London School of Economics.
<http://eprints.lse.ac.uk/28344/1/CASEReport60.pdf>

² Trends in Income Distribution, Congressional Budget Office 25.10.11
<http://www.cbo.gov/publication/42537>

equity. This also includes a greater focus on prevention of ill health, which Belfast Healthy Cities is pleased to see is incorporated in the draft PfG.

It is particularly important to note that the most effective way to strengthen equity is to improve living conditions for all, but with a proportionate emphasis on the most disadvantaged. In other words, focus should not be exclusively on the most disadvantaged areas or groups, but also on the 'middle groups'. Concretely, this means, for example, that action should not only be taken to support people and families on benefits, but also working people and families on lower incomes, who currently often have less access to support than the most disadvantaged. This is to even out the so called gradient in health, which means that all but the most affluent have poorer outcomes, and reduces the life expectancy and opportunities of a large proportion of the population.

- **An equitable distribution of resources and influence**

This emphasises the importance of fair pay and reducing pay and influence gaps across population groups, for the reasons cited above.

This incorporates a focus on the quality of jobs created as well as the number, since access to progression routes and a degree of control over one's job are vital factors to ensure the job contributes to a person's overall health and indeed productivity. While a living wage in itself is important to ensure a sustainable improvement in living conditions, access to progression routes also improves pay prospects, which can underpin motivation.

Equally, it is important to identify ways for people of all ages and backgrounds to become involved in decision making. This will support democracy, and can also encourage a sense of ownership that supports mental and social health and wellbeing. Belfast Healthy Cities has recently undertaken a project aimed at supporting children aged 9-11 to express their views on the physical environment, which highlighted that given the space, children are very capable of making realistic and rational arguments.

- **Putting in place a whole systems framework to monitor progress**

Actions aimed at tackling disadvantage should be based on an understanding of how broader living conditions relate to disadvantage, and aim to create a cross cutting portfolio of specific actions, with desired outcomes, that help improve people's opportunities in a sustainable way. Indeed, all actions should link together in a way that highlights the overall added value. This is important not only for supporting meaningful cross Departmental and sectoral collaboration, but also to maximise value for money.

Compared to the PfG 2008-11, it is encouraging to see that the number of objectives has been condensed, and that actions across Departments are grouped under the same objectives. This reflects a basic understanding of



cross cutting issues, and offers a new platform for cross Departmental collaboration. However, to create stronger incentives for collaboration, shared targets would be helpful. In addition, it would be helpful if actions were clustered together in a way which indicates how Departments can work together to maximise impact.

Belfast Healthy Cities notes with some concern that the proposals incorporated in the draft PfG appear to lack such a cross cutting approach or specific outcomes, which is likely to reduce the effectiveness of actions undertaken. For example, while the aim “Increase the proportion of young people from disadvantage backgrounds who achieve at least 5 GCSEs at grades A*-C (to 49% by 2015)” is specific, it is not clear what the desired outcome is, or what specific, cross sectoral actions will be put in place to support this. In this case, schools alone have a limited impact particularly for children from disadvantaged areas, who may have limited support from home or see limited benefits with doing well at school.

Similarly, while Belfast Healthy Cities welcomes the proposed actions to promote sustainable travel and invest in tackling obesity, it is not clear how these are linked to other actions, or indeed to each other. It may be helpful to consider developing a logic model highlighting this, which could help putting in place an appropriate monitoring framework, and support Departments to identify opportunities to collaborate.

Belfast Healthy Cities has developed the Health Equity in All Policies (HEiAP) approach, which is a policy mechanism that can help organisations achieve their objectives in a way that also addresses inequalities. It allows organisations to use a health lens approach to systematically look at policies and assess them against the social determinants of health, with a view to identifying gaps and integrating health and equity considerations. The approach is based on the belief that all sectors contribute to health and wellbeing. The healthcare sector provides vital care and education, but a high quality built, natural and social environment can prevent ill health, thus reducing the need for healthcare and supporting considerable cost savings. We would be happy to provide further information on the HeiAP approach and tools, should it be helpful.

Potential of focusing on synergies

Belfast Healthy Cities is concerned that a similar emphasis on sustainability and the environment is not evident in the draft PfG. Despite the stated focus on sustainability as an underlying principle, the draft programme contains limited actions aimed at strengthening this. It also appears to miss synergies across Departments that a genuine focus on sustainability can achieve.



Belfast Healthy Cities would strongly welcome strengthening a concrete focus on sustainability and a diverse, protected natural environment and a supportive, people friendly built environment. This is important in its own right. However, Belfast Healthy Cities believes that the benefits that can be achieved across sectors – from health and wellbeing to job creation and economic development – make a particularly compelling case for reviewing the focus on sustainability. Indeed, concerted action and investment in this area now can help strengthen Northern Ireland's long term economic stability and strengthen the region as a world class innovator, which others turn to for examples of good practice and also to bolster business.

It may be helpful in this context to note the success achieved in other regions, which have identified a specific theme as a focus around which the area has developed. For example, Stockholm in Sweden has focused on sustainability, which has not only supported a greener environment and more environmentally aware communities, but also attracted considerable investment both in the local universities and in businesses built around these knowledge hubs. The Øresund region, stretching from Malmö in southwestern Sweden to Copenhagen in Denmark, has focused on high technology education with similar results. In Finland, high quality education through to third level, made available for free to all children, has long been a priority for successive governments across the political spectrum. This has supported a culture of aspiration among young people and also a culture of innovation, particularly in the high technology fields. More recently, increasing focus has been given to distributing technology knowledge hubs across the country, building on existing strengths and unique characteristics, to achieve better opportunities for equitable and balanced economic development.

Through the WHO European Healthy Cities Network, Belfast Healthy Cities has direct access to learning, experience and expertise from cities across Europe and indeed globally. Belfast Healthy Cities would be very happy to share this with the Committee and Departments, should that be helpful for further development of comments on the draft PfG or the PfG itself.

Green space – benefits across sectors and potential action

A key example of an area which can underpin development across sectors is green space. Green space offers people and communities opportunities for stress relief and social interaction, which has been shown to improve in particular mental wellbeing and resilience and also social wellbeing. Green space also encourages physical activity and active play, helping to tackle the problem of sedentary lifestyles and obesity. As access to green space typically is free, this also contributes effectively to tackling inequalities. These effects directly prevent ill health and can generate savings in the health budget. From an environmental perspective, green space reduces flood risk and absorbs pollutants, which generates further health benefits.



On the other hand, investment in green space also generates new job and business opportunities, for example in horticulture and landscaping as well as the leisure and recreation industry. Importantly, these jobs span skill levels, improving opportunities for people with lower qualifications to enter the job market and tackling inequalities. Northern Ireland's natural environment already has the potential to be a major visitor attraction, and a sustainable approach to developing this can significantly increase this economic potential.

Energy – benefits across sectors and potential action

Similarly, a focus on sustainable energy and energy efficiency can generate both health and wellbeing benefits and sustainable prosperity, while reducing greenhouse gas emissions and other environmental impacts. Firstly – as recognised in the draft PfG – fuel poverty constitutes a risk to physical and mental wellbeing, and energy efficient housing plays a part in tackling this. Secondly, improving the energy efficiency of existing housing stock and developing renewable energy options helps create resilience against increasingly volatile energy prices, protecting both individual households and Northern Ireland as a whole.

Both carefully developed retrofit schemes and renewable energy initiatives can also generate major job and business opportunities, again at different skill levels.

It is important to note that many renewable energy initiatives – such as biomass and anaerobic digestion – typically are focused in farming communities, and have potential to boost and revitalise the local economy, supporting regional balance while preserving the unique character of Northern Ireland's rural areas. Developing this pool of expertise can also attract business from elsewhere, as already is occurring with the DONG wind turbine facility being built in Belfast. In particular in this rapidly developing field, there is potential to develop northern Ireland as a world class region for innovation and expertise with export value. However, as with all FDI, it is important in such cases to ensure direct benefits for local people and communities, such as agreements regarding jobs or support for local initiatives.

This, in turn, has positive impacts on the health and wellbeing of rural people. In short, developing this area further can have multiple benefits for Northern Ireland as a whole and Belfast Healthy Cities would welcome a greater focus on this apparent gap. Support for small business does not need to take the form of grants and subsidies, but can for example focus on dedicated business start up support and development advice. It may also be possible to develop specific support schemes in this field under the wider business support schemes currently available. Indeed, greater clarity on the proposed focal areas for business development would be helpful for a large pool of stakeholders from existing and potential entrepreneurs to public service providers.

However, for example a short term energy efficiency/ retrofit grant scheme for householders could provide a welcome boost for the industry, while contributing to



energy security for households and reduced emissions. Such a scheme could be means tested and targeted specifically at low and middle income home owners, to maximise the equity impact as well as value for money.

Gaps – key issues identified and potential ways forward

As land use planning powers are to be devolved to local authorities, it is perhaps understandable that limited mention is made of land use planning. However, it would be very helpful to all stakeholders in land use planning if some reference was made to an implementation timetable. At minimum, it would create more clarity and certainty if a timescale was given for the subordinate legislation and planning policy required to implement the Planning Act (Northern Ireland) 2011. With its new emphasis on sustainable development and wellbeing as the purpose of planning, it gives scope for new approaches to land use planning, which will need to be tested and explored. Both current and future decision makers will also need capacity building in order to be able to discharge their duties effectively, and in ways that create sustainable and people friendly environments.

During the consultation process for the now withdrawn draft PPS24, a significant number of concerns were raised regarding an approach that prioritises economic considerations. For example, the potential long term cost – economic and social – of such an approach was highlighted, along with questions regarding the necessity of added emphasis on economic considerations. It is therefore disappointing that the draft PfG reintroduces a version of this (*Ensure 90% of large scale investment planning decisions are made within 6 months and applications with job creation potential are given additional weight* (DOE), Priority 1, emphasis added). As discussed above, Belfast Healthy Cities would emphasise that planning decisions have far reaching impacts on people's lives, and that benefits of solely economic developments can be outweighed by costs elsewhere. At minimum, it would be important that the intention of this action is clarified, and that it is explicitly stated that job creation is understood in the widest sense. It would be ideal if some reference also could be made to non monetary effects of planning, such as improving access to services or improving amenity, which enhance wellbeing and can significantly support regeneration of a community.

A significant issue, which receives no mention in the PfG, is food. Like health, food has implications for many sectors, and is therefore relevant across all. From a health and equity perspective, access to affordable and healthy food for all is important to tackle ill health and obesity. From an environmental perspective, choices related to food production – whether by larger farmers or micro scale household gardening – can contribute to halting biodiversity loss and may also play a role in dealing with invasive species. From an economic perspective, the export potential of the agri-food sector has already been recognised. However, this is less often set in the context of overall food security, which is a major issue as Northern Ireland is dependent on imports of many foodstuffs.



The potential range of actions related to food is vast, and the draft PfG could significantly benefit if it was linked to other, existing actions in the draft PfG. For example, small scale farm food industry could be a target within actions on SMEs. Small industry and farmers' markets could support both local regeneration, jobs and generate tourism potential. Procurement can play a major role in promoting access to healthy food and preventing ill health, particularly in terms of the quality of food offered to school pupils, hospital patients and others. The impact of this could further be strengthened by building on existing work with the catering industry, supermarkets and others to encourage use of local, seasonal produce, as well as partnerships with local food producers.

Looking at the draft PfG overall, Belfast Healthy Cities notes with some concern that the overt focus of many actions is to invite external investment or external visitors (eg. Deliver at least 30 schemes to improve landscapes in public areas to promote private sector investment in towns and cities across Northern Ireland).

While Belfast Healthy Cities appreciates that this plays a role for establishing economic stability, there is the risk that the needs of residents are overshadowed, and that the ultimate aim of what a PfG tries to achieve for local people is obscured. This is of concern, since it can undermine the confidence and mental wellbeing of local people, affecting social wellbeing of the region as a whole. Lower wellbeing directly affects people's hopes and aspirations for the future, and in extension, also affects productivity, creativity and willingness to engage positively in decision making. It would therefore be important that it is clearly established how different actions aim to support existing residents, and strengthen the civic society which underpins democratic and political decision making .

Comments on the milestones and outputs

It is notable, and concerning, that the Programme for Government 2008-11 Delivery report until 31 March 2011 highlights a significant proportion of missed targets. A closer analysis of these indicates that many of the missed targets relate to health and inequalities in health, but more importantly, shows that the missed targets were overly ambitious, such as 'Halt the rise in obesity by 2010'. In the PfG 2011-15, it is important to set targets that are challenging, but remain achievable. This will not only avoid negative publicity, but support the morale and consequently productivity of professionals tasked with delivering action at all levels. Equally, it is important not to avoid targets completely, as they are necessary to enable monitoring of progress.

It is important to emphasise that focus should be on achieving outcomes. , Targets and indicators therefore need to reflect clearly identified outcomes, with process related targets and indicators as an important but secondary focus. It might be helpful to consider the Scottish government's 'Scotland Performs' model, which includes 16



national outcomes, monitored through 50 performance indicators. These outcomes are cross cutting, which assists government departments to work together and identify how actions join up towards the overarching goals. More information on this model is available at <http://www.scotland.gov.uk/About/scotPerforms/outcome>.

In light of this, Belfast Healthy Cities notes with some concern that many milestones are quite general in nature and do not set SMART targets. There is also limited reference to the desired or intended outcomes, and actions range from the very specific (eg. introduce a levy on single use carrier bags from 2013) to the general (eg. protect and enhance our natural environment by working to halt the loss of biodiversity). It is therefore difficult to assess how these individual actions come together to make a significant impact overall. While the high level nature of the PfG means that detailed action is not appropriate, it would be helpful if the very general actions were developed to include some detail. To the extent possible, milestones should also be SMART, in order to support monitoring and enable assessment of impact. This would also assist Departments and others tasked with delivery gain a clear understanding of the desired direction of travel and expectations placed on them.

Belfast Healthy Cities believes that both targets, and a monitoring framework put in place to track them, should be based on a review of evidence, designed to pinpoint what is achievable and what is most useful for tracking progress. This will include many currently used indicators, but may also identify new ones. A framework may also need to integrate indicators at different levels, to ensure an adequate picture. Key to remember when developing monitoring frameworks is that indicators are effectively signalling lights; they do not give verdicts, but help identify what requires closer attention. In other words, implementation should not be overshadowed by monitoring requirements, but can be much supported by a core set of indicators, chosen to help highlight progress towards a defined and desired outcome.

These should, in addition, be built in from an early stage, so that a baseline position can be established and effective monitoring developed.

Belfast Healthy Cities, in partnership with NIHE, Belfast City Council, PHA, Belfast HSC Trust and the five Belfast Area Partnerships has developed a framework with indicators aimed at monitoring how regeneration affects health and especially inequalities in the target area. The *Good for Regeneration, Good for Health, Good for Belfast* indicator set, which is being presented as a basis for discussion, includes indicators under four headings including economy, social, environmental and access, and emphasises pairing traditional indicators with ones that highlight the impact on inequalities. This is a new area of work, both locally and internationally, and is developed in line with international thinking about what needs to happen to address health inequalities. It is also focused on achieving synergies and highlighting how action that supports health also helps underpin successful regeneration, in turn maximising the return on investment. Next steps will



include further piloting of the framework, and exploring ways of enhancing data available.

Conclusion

Belfast Healthy Cities welcomes the draft PfG in terms of its signs of an emerging understanding of cross cutting issues, in particular how health and wellbeing underpins sustainable prosperity and social cohesion. However, there is significant scope for strengthening action on sustainability and maximising added value, in ways that support people, the environment and also the economy. Specific gaps relate to food, energy and the green economy, while there is also a need to strengthen milestones and outputs to ensure clarity and give stakeholders direction. Finally, an evidence based monitoring framework needs to be put in place to support effective delivery.