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**Draft Programme for Government Framework 2016-2021**

**A response from**

**Sustainable Northern Ireland**

**July 2016**

Sustainable Northern Ireland (SNI) ([www.sustainableni.org](http://www.sustainableni.org)) is a NI charity working with partners to promote the pursuit of sustainable development by public authorities and others. We work principally, but not exclusively, with councils. We are committed to the principles of sustainable development; our work programmes encourage organisations to integrate these principles throughout their own operations and business planning functions. Sustainable Northern Ireland also established the Belfast Food Network, a project to develop and promote Belfast as a Sustainable Food City.

**Introductory Remarks**

Sustainable Northern Ireland welcomes the opportunity to comment on this engaging new approach to a Programme for Government.

We heartily endorse and applaud the outcomes-based approach adopted by the Executive in this PfG Framework. We followed closely and were very supportive of the work of the Carnegie Round Table and we are encouraged to note that the PfG Framework reflects much of the thinking of that group, as well as the model proposed by Mark Friedman[[1]](#footnote-1).

We also support the Executive’s intention to stimulate new methods of programme delivery, both through inter-departmental activity and by working with other bodies, including local government and the third sector.

The document recognises that it “…will require significant change and behaviour to deliver the outcomes” and, in everything from developing a culture of collaboration to the allocation of resources and the creation of effective and trustworthy reporting, the scale of the required change is considerable.

In this response, we offer comments on those outcomes in which we have specific expertise or a professional interest. We have proposed some ideas for alternative wording of existing outcomes, suggestions for refining the outcomes and some comments on indicators and measures, backed by arguments to support our positions.

**PfG Framework Purpose**

‘Improving wellbeing for all’ says everything that is necessary in an overall purpose for the Framework. We agree with the Carnegie[[2]](#footnote-2) report’s observations on wellbeing as “a holistic concept, bringing together social, environmental, economic and democratic outcomes. A wellbeing approach asks us to consider how society if progressing in the round, rather than using economic indicators as a proxy for wellbeing or focusing on specific areas at the expense of others.”

As thus described, ‘wellbeing’ takes on the mantle of sustainable development. It has been the stated intention of the Executive for some years to ensure that the Programme for Government becomes the vehicle for delivering sustainable development in this region. With this PfG framework, it provides an opportunity to do so.

In our view, therefore, there is no need to qualify the purpose with the supplementary phrase ‘by tackling disadvantage, and driving economic growth’. Those sentiments are implicit in the ambition of ‘improving wellbeing for all’. It also unnecessarily emphasises the ‘means’ (how we’ll do this) in a statement of purpose that should focus on the ‘ends’, precisely what Friedman cautions against.

**Outcome 1: We prosper through a strong, competitive, regionally balanced economy**

We suggest a re-working of this statement to read, “We have a strong, competitive, regionally balanced economy”.

One of the underpinning ideas in Friedman’s book on results accountability is the necessity of a ‘common language’. Here, in Outcome 1, the use of the word ‘prosper’ immediately opens a debate on what we understand by prosperity.

A conventional definition of prosperity might most often relate to material satisfactions and, certainly, the acquisition of material commodities to meet the necessities of life is a desirable result. However, to extend the simple equation of quantity with quality, of more equalling better, is clearly false.

The use of the NICEI as a measure for Indicator 20 (Increase the size of the economy) and a key guide to the progress against this outcome suggests the desirability of economic growth as the principal means of securing “prosperity”. NICEI, like GDP, is deeply flawed as a measure of wellbeing, with a key assertion of its critics being the so-called ‘happiness paradox’. This relates to the findings of life-satisfaction surveys that show little change over decades in spite of significant economic growth. In the UK, the percentage of people who report themselves ‘very happy’, declined from 52% in 1957 to 36% today, even though real incomes have more than doubled.[[3]](#footnote-3)

The Purpose of the Programme for Government – to improve wellbeing for all – must embrace a meaning of prosperity that goes well beyond mere material security in order for the people of this region to flourish.

That said, we are not opposing the development of a “strong, competitive, regionally balanced economy” – far from it. We view this element of the PfG as highly desirable, especially if it succeeds in creating more employment opportunities of appropriate levels for people throughout the region.

It is our conviction that climate change remains one of our greatest challenges. Necessarily, it is a challenge for the long-term and could reasonably be considered to deserve an outcome of its own. The Executive has correctly assumed that its PfG outcomes will “…stay in place for a generation rather than a single Assembly term… “. With no dedicated outcome, it is under the primary economic outcome - this one - that climate change must then be accommodated. For that reason, the use of the greenhouse gas emissions measure would more appropriately be located here.

In recent years, we have been making only modest progress in mitigating climate change. Our 16% overall GHG reductions from the 1990 baseline contrasts poorly with the 35% achieved in Scotland or the 30% fall recorded across the whole of the UK. There is a clear case for invigorating activity that will contribute to a low-carbon economy.

Since around 80% of the UK’s environmental legislation has been set and is regulated through our membership of the EU, it is important that the NI Executive reassures businesses and investors as to its intended policy direction in the post-Brexit period. Specifically, the Executive should make a public commitment to continue its adherence to the 2020 targets that come from the Renewable Energy Directive, the Energy Efficiency Directive and the Energy Performance of Buildings Directive, viz:

* 15% of all energy used for electricity, transport and heating should come from renewable energy sources
* UK final energy consumption should fall to 129.2m tonnes of oil equivalent or less (scaled to an appropriate NI contribution)
* All new buildings must be nearly zero energy buildings by the end of 2020 (2018 for public buildings)

Maintaining and improving the environment in Northern Ireland will also serve to enhance the image of this region, thereby contributing to several other outcomes in the PfG Framework, such as those devoted to inward investment and tourism development.

**Outcome 2: We live and work sustainably – protecting the environment**

We suggest a re-working of this statement to read, “Our environment is protected and improved for future generations.”

The emphasis in the proposed outcome implies that environmental protection is a necessary factor in the pursuit of economic growth and, again, it confuses ‘ends’ with ‘means’.

The distinguished economist Herman Daly has observed that “…the natural world is the envelope that contains, sustains and provisions the economy, not the other way round.”[[4]](#footnote-4) As we strive to grow the size of the economy here, it must not be at the expense of the natural assets of the environment.

The loss of biodiversity in our countryside is matched by a decline in its environmental quality and its provision of ecosystem services such as the availability of clean water. Much of this damage can be laid at the door of an increasingly intensified agricultural sector. Yet the agri-food sector is a key component of the economy here; if it is to continue to receive substantial public funding, in this post-Brexit era, the industry must deliver wider benefits to society. Its future is enmeshed with the environment upon which it depends so completely.

A recent [report](http://grist.org/business-technology/none-of-the-worlds-top-industries-would-be-profitable-if-they-paid-for-the-natural-capital-they-use/) for the UN Environment Program calculated the value of the world’s ‘natural capital’ that was consumed by the top industrial sectors. The sectors with the greatest impact were Asian coal power generation (causing damage valued at $452bn) and cattle ranching in South America ($354bn). Worse than that was the finding that none of the top 20 industrial sectors would be profitable if the externalised environmental costs were integrated into their financial balance sheets.

More pointedly, it falls to the public purse to pay for the remediation of the environmental damage. While the scale of damage in this region may be dwarfed by Big Coal and Amazonian deforestation, the principle remains the same; for example, less than one third of our rivers are classified as being in good condition; this dismal record is in part due to the ‘substantiated incidences’ of water pollution, 27% of which are attributed to farming.

None of the measures selected for the indicators relating to this outcome really captures the spirit of what the work seeks to achieve – “protecting and enhancing this stock of natural capital…”. While measures of household waste recycling, greenhouse gas emissions and the use of public transport are all valid environmental gauges, none of them relates directly to the protection and enhancement of natural capital.

The Scottish Government uses natural capital as one of its national indicators and justifies its use succinctly, viz

“Natural capital is the elements of nature that produce value for people, including ecosystems, species, freshwater and land. Scotland’s natural assets are the basis of our quality of life and underpin our economy, and it is crucial that they are protected and enhanced in order to benefit us now and for future generations. Investing in Scotland’s natural capital is seen as fundamental to maintaining a healthy and resilient economy.

Many of Scotland's growth sectors, such as tourism, food and drink, depend on high quality air, land and water. There are many other less tangible ways in which nature sustains us, contributing to our health, wellbeing, enjoyment, sense of place and who we are as a nation.”

As a measure, it deploys a newly-created Natural Capital Asset Index. Since many of the data components of this index are already gathered in Northern Ireland for the former DOE’s annual Environmental Statistics Report, it should be relatively straightforward to develop something similar to the SNH tool.

**Outcome 3: We have a more equal society**

The concept of a more equal society should necessarily embrace our responsibility to the six billion others with whom we share the planet and have regard to inter-generational equity for those who will come after us.

The Scottish government was swift to make a national commitment to the UN’s Sustainable Development Goals[[5]](#footnote-5) (SDGs) through tackling poverty and inequality within Scotland while, at the same time, helping developing countries to grow in a fair and sustainable manner. This course of action recognises that inequality and poverty are global issues that require a contributory response from all countries. The action plan for this outcome could be used to craft the Executive’s response to the SDGs. It may be helpful to refer to the valuable report[[6]](#footnote-6) on their UK implementation, published by the House of Commons International Development Committee.

Meanwhile, the Welsh government has introduced its ground-breaking Wellbeing of Future Generations Act[[7]](#footnote-7), strongly linked to the SDGs in spirit and content. There is so much of value within this document and we commend it to those with the responsibility of creating the action plans for these Framework outcomes.

**Outcome 4: We enjoy long, healthy, active lives.**

We strongly support this outcome and its intentions. Among the elements that will make up the Executive’s contribution is the implementation of excellent public health strategies. In our view, this is the platform upon which this outcome can best be delivered – ‘prevention is better than cure’.

The Department of Health has long recognised the implications of obesity and overweight to the health of our population. The prevention strategy, *A Fitter Future for All,* has now been in operation for four years; it deploys a mix of interventions designed to change behaviours around diet and exercise. The indicators used to measure its success are stubbornly unmoved and some adjustments have been made to its short term outcomes.

By 2012, the Department’s annual health survey showed 25% of men and 22% of women were obese. When overweight measures were included, the percentage rises to 61% of NI adults. These figures are quoted, not to denigrate the efforts of public health professionals to tackle the problem, but to illustrate the scale of the challenge that lies ahead of us. Despite the decade of excellent preventative work that has been undertaken, the statistics reflect the powerful forces at play in what has now been termed the ‘obesogenic environment’ in which we all live.

The potential health impacts of obesity have been well rehearsed: heart disease, Type II diabetes, osteoarthritis, hypertension and mental health issues among them. In addition, evidence indicates that being obese can reduce life expectancy by up to nine years and can affect emotional wellbeing and self-esteem. It is estimated that this ‘epidemic’ costs the NI economy over £1m per day.

We are convinced that the goal of long, healthy lives is inextricably linked to our diet. Public health policy should continue to promote an understanding of the value of fresh, minimally processed, nutritious food, while improving its affordability to tackle the social injustice of food poverty.

If diet is critical to positive health outcomes, so is exercise. The natural environment provides widespread opportunities for active engagement at every level of physical ability and for every age. The concept of ‘exercise prescriptions’ already exists, through which a medical professional may prescribe a specific programme of activities, perhaps gym-based, for a patient’s recovery. Other innovative approaches, such as the use of ‘green prescriptions’, take that idea a step further, using the natural environment for the exercise. In rural locations, there are plenty of suitable places for recreational exercise; with the development of green urban corridors, such as the Connswater Community Greenway, similar opportunities are available to town dwellers.

There are few outcomes in this framework that are of greater relevance to our wellbeing than this one. We suggest that its associated action plan should seek to emphasise, once again, the importance of fresh, healthy food and regular outdoors exercise as the foundation for a long, healthy, active life.

**Outcome 12: We have created a place where people want to live and work, to visit and invest**

Northern Ireland’s environment contains some of its most significant attractions. It has spectacular landscapes, one of the finest coastlines in Europe, some outstanding wildlife sites and an impressive variety of built and cultural heritage assets.

That its only World Heritage Site, the Giant’s Causeway, is the region’s most-visited attraction says a lot about its international standing but also attests to the pulling power of a natural asset. However, it is not only in its tourism potential that our relatively unspoiled environment demonstrates its economic significance; it is also a factor in contributing to that elusive ‘quality of life’, of interest to companies in attracting people to work in this region.

Although Northern Ireland is viewed as a predominantly rural place, two-thirds of us live in urban areas. In our troubled recent past, it was never easy to attract the inward investment that was deemed important to our economic growth. That sometimes resulted in planning approvals with minimal constraints for physical developments of poor design quality on inappropriate sites.

With the land-use planning process having now moved to councils, the introduction of Community Planning and new Local Development Plans in preparation, the opportunity exists to plan new urban spaces that demonstrate high levels of social, economic and physical sustainability, all of which will serve to create places in which people want to live. In this regard, the use of the guidelines in the excellent Living Places[[8]](#footnote-8) document, published by the former DOE, should be mandatory in the planning process.

High levels of optimism and hope have been invested in Community Planning. As the plans emerge, their outcomes-based structure may, in time, lead to the sort of joint outcomes with the Executive’s programme that will demonstrate the desirable levels of synergy. It will be critical that departmental resources are combined with those of the councils to promote the collaborative delivery of common outcomes for the wellbeing of the people served by both parts of government.

**Outcome 13: We connect people and opportunities through our infrastructure**

As the language of sustainable development policy has evolved over the last two decades, we have come to recognise ‘wellbeing’ as its conceptual synonym. Another idea that is gaining widespread currency is ‘resilience’.

As promulgated by the Rockefeller Foundation through its *100 Resilient Cities* programme, in which Belfast has recently been accepted as a member, resilience is the capacity of a city – or, indeed a region – to survive, adapt and grow in the face of chronic stresses and acute shocks.

Stresses include such elements as high unemployment or shortages of food; they also embrace inefficient public transport systems. Shocks are understood to include terrorist attacks and outbreaks of disease but also flooding and droughts. The region’s infrastructure is critical to its capacity to cope with several of these exigencies.

The month of June 2016 has marked the 14th consecutive month of record-breaking global temperatures. The impacts of climate change are becoming more frequent and more widely distributed. Further substantial changes to the climate are now unavoidable and all infrastructure projects, with their long lifespans, must henceforth take account of the need to adapt to the effects of climate change. They must incorporate a capacity for resilience.

Resilient infrastructure will include man-made structures, such as the rock armour of coastal defences, but it will also encompass natural resources like wetlands and sand dune systems. Both natural and constructed facilities need to be maintained to their full functionality.

A resilient region needs to ensure the continuity of its critical services. Roads and bridges must be able to withstand flooding to organise safe evacuations of people – our emergency planning groups have built up valuable experience in such scenarios in the last decade – but there is also a strong case for the alleviation of flooding through better ecosystem management. That could embrace tree-planting to combat run-off or upland drainage management, such as NI Water has successfully trialled on the Garron Plateau.

Sustainable transportation is another crucial requirement of the resilient region. The challenges for this region are considerable. Daily journeys are dominated by the use of private cars – 72% of us commute in that way, with a 23% growth in ownership in the past decade. Our use of public transport has remained fairly static at 5%. It is clearly acknowledged that there has been considerable departmental effort to promote active travel and the use of trains & buses but it is equally clear that such initiatives will have to be re-doubled in the next PfG period.

This submission serves only to offer some limited comments on the plethora of issues to be considered in depth as the Programme for Government is further developed. We will be pleased to provide additional opinion if it will be helpful.

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Sustainable NI

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1. Friedman, M (2005) Trying Hard Is Not Good Enough. FPSI Publishing [↑](#footnote-ref-1)
2. <http://www.carnegieuktrust.org.uk/carnegieuktrust/wp-content/uploads/sites/64/2016/02/pub1455011423.pdf> [↑](#footnote-ref-2)
3. <http://www.sd-commission.org.uk/data/files/publications/prosperity_without_growth_report.pdf> [↑](#footnote-ref-3)
4. <http://www.sustainableni.org/blog/book-review-positive-deviant-sustainability-leadership-perverse-world> [↑](#footnote-ref-4)
5. <https://sustainabledevelopment.un.org/sdgs> [↑](#footnote-ref-5)
6. <http://www.parliament.uk/business/committees/committees-a-z/commons-select/international-development-committee/news-parliament-20151/sustainable-development-goals-report-published-16-17/> [↑](#footnote-ref-6)
7. <http://thewaleswewant.co.uk/about/well-being-future-generations-wales-act-2015> [↑](#footnote-ref-7)
8. <http://www.planningni.gov.uk/index/policy/supplementary_guidance/guides/livingplaces_-_web.pdf> [↑](#footnote-ref-8)