



Belfast City Council.

Report to:	Strategic Policy and Resources Committee
Subject:	Consultation response to the OFMDFM draft second Sustainable Development Strategy entitled 'Everyone's involved'.
Date:	11 th December 2009
Reporting Officer:	Mr. William Francey, Director Health and Environmental Services (ext. 3260).
Contact Officer:	Alastair Curran, Sustainable Development Manager (ext. 3309).

Relevant Background Information

The United Kingdom government published its most recent Sustainable Development Strategy entitled 'Securing the future - delivering UK sustainable development strategy' in March 2005 and augmented the Strategy with a framework for sustainable development until 2020 in order to provide a consistent approach and focus across the United Kingdom. This approach was agreed by the UK Government and the devolved administrations. In its commitment to the strategic framework, the Northern Ireland Office committed to the development of a Northern Ireland Sustainable Development Strategy, which would establish a long-term regional vision of sustainable development, together with a series of high-level objectives. The Strategy was to be underpinned by an Implementation Plan, which would set out the detailed actions to be undertaken to deliver both high and lower-level objectives and targets, based upon Northern Ireland priorities.

Accordingly, on 9th May 2006, the then Secretary of State, Peter Hain launched the first Sustainable Development Strategy for Northern Ireland entitled 'First Steps Towards Sustainability'. The Strategy identified six priority action areas for Northern Ireland including sustainable consumption and production; natural resource protection and environmental enhancement; climate change and energy; learning and communication for sustainable development; sustainable communities; and governance and sustainable development. These six priority action areas each had their own strategic objectives and associated targets and their delivery was to be progressed through a series of Implementation Plans.

The Strategy recognised the crucial role of district councils in delivering sustainable development, highlighting that, following the Review of Public Administration, new councils would be at the centre of service delivery and civic life. The Strategy also stated that councils would be key to the planning and delivery of services within their areas and to engagement with communities. Such was the perceived importance of the local authority contribution towards sustainable development, government committed to the introduction of a new power of community planning, with a statutory duty on councils to initiate, maintain and facilitate a community planning process. The local authority contribution towards sustainable development was to be reinforced further via the introduction of a statutory duty on relevant public bodies to contribute to the achievement of sustainable development.

In November 2006, the Northern Ireland government published its Sustainable Development Implementation Plan, which transferred responsibility for sustainable development from DoENI to the Office of the First Minister and Deputy First Minister (OFMDFM). The Implementation Plan was however restricted to only three spotlight themes from the Strategy's six action areas and actions were confined to government Departments, although OFMDFM indicated that a full Implementation Plan would be developed to cover the period from April 2008. This commitment was not fulfilled and, to date, no further Sustainable Development Implementation Plans have been published. The Implementation Plan did highlight however, the commencement of the statutory duty requiring public authorities to act to promote sustainable development in the exercise of their functions. The Implementation Plan went on to confirm that OFMDFM would be liaising with local authorities and others regarding how the obligations of the statutory duty could be fulfilled. This has not occurred to date, although the Director of Legal Services has written to OFMDFM on a number of occasions requesting clarification. The Implementation Plan also indicated that the Northern Ireland Sustainable Development Strategy would be subjected to a complete review at an appropriate stage, possibly around 2010.

Key Issues.

On 22nd October 2009, OFMDFM launched the draft second Sustainable Development Strategy entitled 'Everyone's Involved' for consultation. OFMDFM has acknowledged that the new Strategy is a significant departure from the previous publication in terms of both format and complexity, describing the new Strategy as an enabling document that reflects the vision of the Programme for Government. However, the current Programme for Government expires in 2011 and consequently it is unclear how the Sustainable Development Strategy can reflect successfully future versions. The Strategy is underpinned nonetheless by the need to secure a balance between social, economic and environmental considerations.

The overarching United Kingdom Sustainable Development Strategy has identified four priority areas for immediate action across the UK:- sustainable consumption and production; climate change and energy; natural resource protection and environmental enhancement; and sustainable communities. The UK government has indicated that addressing these priorities will also help to shape the way the UK works internationally by ensuring that our objectives and activities are aligned with international goals. The draft second Northern Ireland Strategy appears however to have discarded these agreed objectives in favour of five alternatives:-

- Building a dynamic, innovative and responsible economy that delivers the prosperity required to tackle disadvantage and lift people in all our communities out of poverty.
- Strengthening society so that it is more tolerant, inclusive of all communities and stable and permits positive progress in quality of life for everyone.
- Driving sustainable, long-term investment in key infrastructure to support economic and social development.
- Ensuring the responsible use and protection of natural resources in support of a better quality of life and a better quality environment.
- Ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint.

The Strategy provides little in the way of explanation as to how these objectives are to be achieved or indeed the source and extent of funding available to support their delivery. Moreover, the Strategy contains no targets and nor does it include detail as to how progress towards each objective will be monitored and reported.

Despite identifying the crucial role of district councils in achieving sustainable development, the draft Strategy has been developed without input from local government and, therefore, focuses primarily upon actions to be delivered by government departments. Indeed, there is little or no detail regarding those actions to be delivered by local government including, for example, reference to the contribution of planning and development control to meeting the Strategy's social and economic objectives whilst protecting the natural environment and reducing greenhouse gas emissions. Moreover, the draft Strategy contains a series of commitments in relation to ethical and fair trade. The UK Fairtrade Foundation has identified the fundamental role of local authorities in its Fairtrade Towns and Cities campaign, highlighting that they must pass a resolution supporting Fairtrade, and agree to serve Fairtrade products in meetings, offices and canteens. They must also participate in a Fairtrade Steering group and help to raise awareness and understanding of Fairtrade across the community. Belfast is presently jointly accredited by the UK Fairtrade Foundation and Fairtrade Mark Ireland. The Strategy fails to recognise this contribution, instead focusing upon a central government programme to promote, establish and facilitate ethical and fair trade relations. Consequently, it is recommended that the focus of the Strategy should be expanded to reflect accurately the valuable contribution from local authorities and others towards achieving sustainable development.

Nonetheless, the Strategy does acknowledge the contribution to be made by local authorities by referring to the statutory duty to exercise their functions in the manner they consider best calculated to promote the achievement of sustainable development. OFMDFM highlights that the impact of the duty to date has been marginal, citing interpretation difficulties and an absence of guidance associated with the legislation. Although OFMDFM issued draft guidance on the duty in February 2007 to a select range of consultees, a full consultation has not been completed and final guidance has not been issued to date. It is recommended therefore, that any future guidance should be developed in consultation with local authorities and should reflect the need for local authority sustainability appraisals to be applied only to significant policies or functions.

OFMDFM has indicated that the Strategy is to be supported by the development of an Implementation Plan, which is scheduled to be published in 2009. It appears that the Implementation Plan is to be restricted to government actions and as the Strategy consultation is not scheduled to close until 15th January 2010, it is unclear how OFMDFM will be able to reflect adequately consultees' comments and concerns within the Implementation Plan.

Key Issues contd.

In terms of monitoring and reporting progress towards sustainable development, OFMDFM has committed to compiling a regular report containing indicators of Departments' progress against strategic objectives. It is unclear however, how contributions from the wider public sector, the community and voluntary sector and the private sector will be monitored and reported. Indeed, it is unclear how the Strategy will advance Northern Ireland's contribution towards the 20 United Kingdom Framework indicators, collated and reported by National Statistics and the Department for Environment, Food and Rural Affairs (DEFRA).

Finally, OFMDFM has not indicated the lifespan of the draft Sustainable Development Strategy but has advised that it will be periodically reviewed. It is considered that such an arbitrary commitment is inappropriate and that the content of the Strategy should be reviewed and redefined in light of progress towards SMART sustainable development targets and objectives. Furthermore, it is recommended that the Strategy should be reviewed periodically to account for emerging obligations and priorities identified in forthcoming editions of the Programme for Government.

In publishing the draft Sustainable Development Strategy for consultation, OFMDFM has included a range of questions for consideration by consultees. Responses to those questions where applicable are included in the draft Council response provided in Appendix A.

Resource Implications.**Financial and Human Resources.**

There are no immediate financial obligations for the Council associated with the launch of the second Northern Ireland Sustainable Development Strategy however, there may be staff time and financial commitments associated with demonstrating compliance with the statutory duty on sustainable development.

Asset and Other Implications.

N/A

Recommendations.

The Committee is invited to endorse the attached consultation response in respect of the draft second Sustainable Development Strategy and to recommend that it be submitted to the Sustainable Development Unit, Office of the First Minister and Deputy First Minister by the consultation closing date of 15th January 2010.

Key to Abbreviations.

DEFRA	- Department for Environment Food and Rural Affairs.
DoENI	- Department of Environment (Northern Ireland).
OFMDFM	- Office of the First Minister and Deputy First Minister.
RPA	- Review of Public Administration.
SMART	- Specific, measurable, achievable, relevant and time-bounded.

Documents Attached.

Appendix A - Belfast City Council response to the Office of the First Minister and Deputy First Minister consultation on the draft second Sustainable Development Strategy entitled 'Everyone's Involved'.

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Question 1 - Do you agree that the draft Sustainable Development Strategy presents itself as an enabling document, which paves the way for the creation of an Implementation Plan, containing explicit plans and targets in support of sustainable development? If you do not agree, please explain why and what alternatives you would propose.

Government has determined that the goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. Accordingly, the most recent United Kingdom Sustainable Development Strategy entitled 'Securing the future - delivering UK sustainable development strategy' was published in March 2005 and is underpinned by the UK's shared framework for sustainable development entitled 'One future – different paths', which is designed to provide a consistent approach to sustainable development until 2020. The shared framework for sustainable development comprises a shared understanding of sustainable development, a common purpose outlining what we are trying to achieve and the guiding principles that we all need to follow to achieve it, sustainable development priorities for UK action at home and internationally and the development of indicators to monitor the key issues on a UK wide basis. It also acknowledges that each devolved administration should develop its own Sustainable Development Strategy to address regional priorities as well as contributing towards the achievement of common UK goals and challenges.

The UK Sustainable Development Strategy identifies a series of shared priorities for action including:-

- Sustainable consumption and production – improving the manner in which goods and services are produced to include an assessment of impacts across their whole lifecycle and reducing the inefficient use of resources, thereby boosting business competitiveness and decoupling the link between economic growth and environmental degradation.
- Climate change and energy – securing a profound change in the way that we generate and use energy, and in other activities that release greenhouse gases.
- Natural resource protection and environmental enhancement – developing a better understanding of environmental limits, environmental enhancement and recovery where the environment is most degraded to ensure a decent environment for everyone, and a more integrated policy framework.
- Sustainable communities – giving communities more power and say in the decisions that affect them and working in partnership at the right level to get things done.

Government has suggested that these shared priorities will help to shape the way in which it and the devolved administrations work internationally.

Accordingly, the first Northern Ireland Sustainable Development Strategy addressed these four priority action areas from a Northern Ireland perspective. The Strategy also identified learning and communication for sustainable development and governance and sustainable development as additional regional actions. For each of these action areas, the Strategy identified clearly a vision for Northern Ireland and went on to outline strategic objectives, key targets and delivery mechanisms.

The draft second Northern Ireland Sustainable Development Strategy appears to have abandoned this comprehensive approach in favour of what is described as an 'enabling document, which points the way forward for our plans, rather than as a finely detailed, technically based document which is difficult to understand and of restricted interest'. OFMDFM has stated that sustainable development terminology sometimes leads to confusion, and the concept itself is often viewed as being too abstract. It should be noted however, that government departments such as DEFRA have simplified the definition of sustainable development to mitigating negative and increasing positive social, economic and environmental impacts of policies or projects. The Council is concerned that by adopting a more generalist approach and Northern Ireland specific priorities, the draft Strategy is likely to exacerbate current confusion regarding sustainable development and lose an important opportunity to stimulate action across all sectors.

For example, within the first Sustainable Development Strategy, the text clearly explained how resource efficiency, waste minimisation and materials recovery, re-use, and recycling could contribute towards improving the resource efficiency of the Northern Ireland economy to 85% by 2025. The Strategy also identified organisations and groupings that had a direct role to play in achieving this objective. This approach was replicated throughout all action areas within the first Strategy document and the Council considers that in taking a much more high-level approach to strategic direction, there is a clear risk that action will be inhibited. It is also unclear whether the numerous targets and objectives articulated within the first Sustainable Development Strategy and the actions commended in their pursuit have now been discarded.

If priority action area 5 (page 13) and its amplification on page 15 is taken as a case in point, there is a commitment to ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint. The March 2008 Department of the Environment State of the Environment Report provides a sectoral analysis of carbon dioxide (CO₂) emissions, identifying that 34% arises from energy generation, 33% from transport, 9% from businesses, 2% from businesses and less than 1% from the public sector. The draft second Sustainable Development Strategy fails to include any characterisation of the principal sources and therefore anyone referring to the Strategy would be unlikely to appreciate the targets being pursued, the extent of remedial actions required, how to prioritise those actions and the personal contribution that they could make. Indeed, the Strategy commitment to reducing our carbon footprint also fails to make any linkage with the procurement aspects of strategic objective 1, the development aspects of strategic objective 2 and the transport provisions of strategic objective 3.

The Council urges therefore that the second Sustainable Development Strategy should include a fuller explanation of the strategic objectives and also identify the role that organisations and groupings have in achieving those objectives. The Council is also concerned at the suggestion that this action will be achieved via an Implementation Plan, to be published in 2009, given that the Plan is scheduled to conclude in 2011. It is clear that many of the strategic objectives extend well beyond 2011 and consequently, the Council considers that uncertainty regarding the content of subsequent Implementation Plans will not encourage organisations and groupings to engage with the sustainable development process. For example, in relation to climate change, the Climate Change Act 2008 introduced a long-term target of an 80% reduction in the net UK carbon account by 2050, measured against a 1990 baseline. Since this objective is unlikely to be revised for some time, the Council

considers that it should be articulated within the Strategy document rather than repeated within successive Implementation Plans. This comment is also relevant to a range of other longer-term Northern Ireland strategic government publications referred to within the Strategy such as the Regional Development and Regional Economic Strategies, etc. It is recommended however, that specific targets and contributing actions should be incorporated within the Implementation Plans, as these will be expected to vary over time and with changing local priorities.

With regard to development of the Implementation Plan, it is unclear how it will be able to reflect consultees' views, given that it is to be published in 2009 and the Strategy consultation is not scheduled to close until 15th January 2010.

Finally, OFMDFM has not indicated the lifespan of the draft second Sustainable Development Strategy, instead stating that it will be reviewed periodically as sustainable development plans are progressed. The Council takes the view that failing to provide an implementation timetable will discourage organisations and groupings from engaging effectively with the sustainable development process.

In conclusion, it is considered that the draft second Sustainable Development Strategy will not function effectively if it is merely an enabling document as it fails to provide sufficient explanation of its strategic objectives, fails to identify strategic targets and fails to identify the important steps and contributors towards those targets. Moreover, the Strategy focuses almost exclusively upon the actions of central government and has been developed without contribution from local government and others, despite an acknowledgement that there is a critical contribution to the achievement of sustainable development to be made by district councils.

Question 2 - Do you agree that the draft Sustainable Development Strategy will effectively link high-level objectives to delivery of plans? If you do not agree, please explain why and what alternatives you would propose.

The Council does not agree that the draft Sustainable Development Strategy will link successfully high-level objectives of economic prosperity, social cohesion, environmental protection and meeting national and international obligations to the delivery of plans since the Strategy document contains little explanation of the high-level objectives. The Council would also contend that the complex definitions that have been included within the Strategy (page 2-3) will do little to assist in their understanding and commitments towards 'promotion' do not adequately reflect the need for progress or action in particular areas.

The draft Strategy acknowledges that the goal of sustainable development is to put in place effective economic, social and environmental measures to ensure that we can continue to grow our economy, improve our society and communities and capitalise on our natural resources in the years to come, although the overarching ambitions of the Strategy are living within environmental limits and ensuring a strong, healthy, just and equal society. Within the Strategy, it is unclear however, where the optimum balance should lie between social, environmental and economic considerations and how this balance should be assessed. Furthermore, although government departments will be required to

incorporate comprehensive 'sustainability scans' as a component of their Regulatory Impact Assessment process, it is unclear how the outcome of these 'sustainability scans' will be weighed alongside the conclusions of other impact assessments in the choice of options for a particular policy or strategy.

The Council notes that the Department for Environment, Food and Rural Affairs (DEFRA) has published a 'Stretching the Web' tool to help practitioners integrate Sustainable Development considerations into their policymaking, as well as project and programme work. DEFRA has characterised the tool as a means of moving away from attaining the traditional balance between economic, environmental and social impacts by opting to mitigate negative impacts, and maximise the positive impacts of a policy, project or programme.

From a local authority perspective, section 25 of the Northern Ireland (Miscellaneous Provisions) Act 2006 imposes a statutory duty upon local authorities to contribute towards the achievement of sustainable development. The duty requires a public authority to have regard to any strategy or guidance relating to sustainable development issued by the Department of the Environment and a public authority other than a Northern Ireland department must also have regard to any guidance relating to sustainable development issued by a Northern Ireland department other than the Department of the Environment.

The draft second Strategy document acknowledges that the potential impact of the duty is significant in providing a mandate for public sector bodies to direct their activities to achieve positive sustainable development outcomes, and to do so without compromising their other existing statutory obligations. OFMDFM has identified however, that on the basis of available information, the impact of the duty to date appears to have been marginal, adding that the duty has proved difficult to interpret for public sector bodies, in part due to the absence of guidance associated with the legislation.

The Council considers the lack of final guidance from OFMDFM to have been a principal barrier to interpreting and demonstrating compliance with the statutory duty. OFMDFM has now indicated that making the statutory duty more effective in supporting the delivery of a positive contribution to the sustainable development agenda from the wider public sector will be an important aspect of the implementation of the Sustainable Development Strategy. Accordingly, the Council urges OFMDFM 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 OFMDFM introduce a requirement for sustainability screening, 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.

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

Question 3 - Do you agree with the Principles, Priorities and Strategic Objectives identified within the draft Sustainable Development Strategy? If you do not agree, please explain why and what alternatives you would propose.

The Council notes that the draft Strategy's guiding principles have been derived from the 2005 UK Government Sustainable Development Strategy and echo those of the first Sustainable Development Strategy with the inclusion of an additional principle of promoting opportunity and innovation in order to encourage the successful exploitation of new and existing ideas to deliver economic, social and environmental benefits.

In terms of the priority areas for action, the actions articulated within the previous Sustainable Development Strategy and the UK Government Sustainable Development Strategy have been omitted in favour of:-

- Building a dynamic, innovative and responsible economy that delivers the prosperity required to tackle disadvantage and lift people in all our communities out of poverty.
- Strengthening society so that it is more tolerant, inclusive of all communities and stable and permits positive progress in quality of life for everyone.
- Driving sustainable, long-term investment in key infrastructure to support economic and social development.
- Ensuring the responsible use and protection of natural resources in support of a better quality of life and a better quality environment.
- Ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint.

While this approach provides direct links to the 2008-2011 Programme for Government, the draft Strategy should also explain its contribution to the United Kingdom Sustainable Development Strategy shared priorities for action. Given OFMDFM's comments regarding confusing terminology and the need for governments around the world to make the concept of sustainable development 'real' for everyone, the Council is also concerned that the previous Strategy commitment towards learning and communication for sustainable development has not been retained. The Council is also particularly concerned that the commitment towards Sustainable Communities and the reference to the local authority role in community planning and the power of wellbeing has also been omitted from the new Strategy. This would be regarded as a key sustainable development delivery mechanism for local authorities.

The Council also notes that the previous Strategy commitment of addressing climate change and energy has been replaced with a commitment to ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint. This is to be achieved by reducing our greenhouse gas emissions; increasing the proportion of energy used that is produced from indigenous, and renewable sources; ensuring affordable access to energy provision and fuel and security of supply; and planning and preparing for the impacts of climate change. It is unclear whether the previous Strategy objectives of reducing greenhouse gas emissions by 25% below 1990 baseline levels by 2025 and making the government estate carbon neutral by 2015 have been retained. The draft Strategy also makes no reference to Northern Ireland's contribution towards the UK Climate Change Act 2008 carbon reduction target of an 80% reduction in the UK net carbon account against the 1990 baseline by 2050.

The draft Strategy has identified that a component of ensuring responsible use and protection of natural resources in support of a better quality of life and a better quality environment is effective planning that enables development to meet social and economic requirements whilst respecting our natural environment. It should be noted that the transfer of responsibility for local development plans and development control and enforcement to local authorities under the Review of Public Administration is scheduled to be completed in April 2011, although this has not been acknowledged within the draft Strategy text.

Question 4 - Do you agree the Commitments (Annex A) will be sufficient to make sure those inside and outside government contribute to the Strategy? If you do not agree, please explain why and what alternatives you would propose.

As most of the commitments summarised in Annex A relate to government departments and include requirements for sustainability scans, which will provide SMART evidence of the inclusion of sustainability criteria and for monitoring and reporting mechanisms, the Council considers that the draft Strategy would provide adequate assurance of appropriate contribution from central government on the assumption that the obligation for government departments to contribute to the Strategy will be reinforced further via the Implementation Plan.

With regard to the local government contributions towards the Strategy, Annex A contains a commitment (9) that guidance relating to the existing sustainable development duty will be appropriate in supporting government's sustainable development ambitions. In addition, commitment 13 relates to the creation of a collaborative mechanism, which will bring together representatives from the local government sector and others with the purpose of progressing sustainable development ambitions.

Given that the Strategy acknowledges that there is a critical contribution to be made towards the achievement of sustainable development by the public sector, including district councils, the Council considers it essential that the Strategy is more explicit about the details of potential contributions across the public sector.

With regard to commitment 18, government has committed to publishing a comprehensive programme to promote, establish and facilitate ethical and fair trade relations, which support sustainable growth. It should be noted that the Fairtrade Foundation is the independent non-profit organisation that licenses use of the Fairtrade Mark on products in the UK in accordance with internationally agreed Fairtrade standards. The Foundation's mission is to work with businesses, community groups and individuals to improve the trading position of producer organisations in order to deliver sustainable livelihoods for farmers, workers and their communities. Accordingly, the Foundation provides independent certification of the trade chain, licenses the use of the Fairtrade Mark as a consumer guarantee on products, facilitates the market to grow demand for Fairtrade and enable producers to sell to traders and retailers, works with partners to support producer organisations and their networks and raises public awareness of the need for Fairtrade and the importance of the Fairtrade Mark.

In order to raise public awareness regarding the need to support Fairtrade, the Fairtrade Foundation has launched a Fairtrade Towns and Cities campaign. To become accredited as a Fairtrade Town or City, five goals must be achieved as follows:-

- The local council must pass a resolution supporting Fairtrade, and agree to serve Fairtrade products in meetings, offices and canteens.
- A local Fairtrade steering group must be convened to ensure that the Fairtrade Town campaign continues to develop and gain new support.
- A range of Fairtrade products must be readily available in the area's retail outlets to include shops, supermarkets, newsagents and petrol stations, and be served in local catering outlets such as cafés, restaurants and pubs.
- Local workplaces and community organisations including places of worship, schools, universities, colleges and other community organisations must support Fairtrade and use Fairtrade products whenever possible. A flagship employer is required for towns or cities with populations over 100,000.
- Media coverage and events must be delivered to raise awareness and understanding of Fairtrade across the community.

A number of cities, towns and villages across Northern Ireland are presently accredited by the UK Fairtrade Foundation and Fairtrade Mark Ireland. Moreover, the UK government has recently also recognised the benefits of Fairtrade by agreeing to provide £12 million in funding over the next four years to the Fairtrade Foundation and its international partners in the Fairtrade Labelling Organisations.

The first Sustainable Development Strategy contained a commitment that new government contracts would specify Fairtrade products in catering facilities in all newly occupied buildings and that Fairtrade produce would be used for official hospitality. The Council contends that if the promotion of Fairtrade continues to be a strategic priority, then encouraging local authorities to support the Fairtrade Towns and Cities campaign would be an effective mechanism for ensuring its promotion.

Question 5 - Do you agree with the scope of the four broad Key Challenges for cross-sectoral engagement set out in Chapter 3? If you do not agree, please explain why and what alternatives you would propose.

With regard to the wider public sector, the Strategy identifies that there is a critical contribution to the achievement of sustainable development to be made by public sector bodies outside the direct control of the Executive, including district councils, government owned companies, arms-length bodies, etc.

The draft Strategy acknowledges that a statutory duty to promote sustainable development is provided for by section 25 of the Northern Ireland (Miscellaneous Provisions) Act 2006, which requires departments and district councils to exercise their functions in the manner they consider best calculated to promote the achievement of sustainable development. This duty commenced from 31st March 2007. The draft Strategy also acknowledges that the impact of the duty is significant in providing a mandate for public sector bodies to direct their activities to achieve positive sustainable development outcomes, and to do so without compromising their other existing statutory obligations.

As highlighted in the Council's response to Question 2, OFMDFM has identified that the impact of the duty to date appears to have been marginal, with the duty having proved difficult to interpret for public sector bodies, in part due to the absence of guidance associated with the legislation. Accordingly, OFMDFM has concluded that making the statutory duty more effective in supporting the delivery of a positive contribution to the sustainable development agenda from the wider public sector will be an important aspect of the implementation of the Strategy.

Although draft guidance in connection with the sustainable development statutory duty was issued previously for limited consultation, the Council considers the failure to develop final guidance to be an important obstacle to consistent and effective action.

Belfast City Council therefore recommends that OFMDFM should engage with all local authorities as soon as possible regarding the development of further guidance. It is also recommended that any sustainable development impact assessment should be proportionate to the extent of the likely impact and that a screening mechanism should be introduced that will ensure that only significant policies or functions need be appraised. Finally, Council recommends that any compliance reporting mechanism should be straightforward.

Question 6 - Does the draft Sustainable Development Strategy provide you or your organisation with sufficient information to facilitate the shaping of your own sustainable development plans? If you do not agree, please explain why and what alternatives you would propose.

In response to the publication of the first Sustainable Development Strategy, Belfast City Council reinforced its commitment towards sustainable development by including an objective of improving the quality of life, now and for future generations by creating a cleaner, more attractive, safer and healthier city, with a strong economy within its Corporate Plan and updates. The Council's 2008-2011 Corporate Plan continues this commitment by establishing sustainable development as the overarching objective within the Council's Value Creation Map.

Alongside the Council's corporate commitment towards sustainable development, a multidisciplinary Sustainable Development Steering Group was convened to deliver actions and projects within the Council's Sustainable Development Action Plan, which was developed to address the priority action areas of the first Sustainable Development Strategy.

Although the draft second Sustainable Development Strategy provides a list of strategic objectives on pages 13-15, the Council considers that insufficient information has been provided to enable the focus of the objectives to be accurately interpreted or prioritised. Moreover, it also notes that few of the objectives are applicable to local authorities.

For example, referring to the first Sustainable Development Strategy, the local authority obligation under the theme of natural resource protection and environmental enhancement regarding air quality management was clearly defined as meeting the health-based objectives for the seven key pollutants in the Air Quality Strategy by 2010. The Strategy went on to provide amplification regarding air quality

reviews and assessments, preparing and implementing air quality action plans and management of local air quality.

Furthermore, with regard to the development of sustainable communities, the first Strategy highlighted a commitment to ensure that community planning is implanted within the revised local authority system. The Strategy also recognised the work of local authorities in introducing measures to reduce crime, tackle anti-social behaviour and reduce fear of crime and the local government role in delivering sustainable development in the community. There were further examples of clear direction to local authorities within the climate change and energy and governance and sustainable development sections. Accordingly, Belfast City Council considers that district councils, in common with other bodies outside central government, would be assisted greatly in shaping more effectively their sustainable development and corporate plans by a more expansive and explicit account of potential actions in support of the Strategy.

Question 7 - We will develop indicators of sustainability which will align with the Programme for Government and national and European indicators. To what else should we have regard in doing this?

The 2005 UK Sustainable Development Strategy contains a commitment to develop a new set of twenty high-level indicators, the UK Framework Indicators, to give an overview of sustainable development and progress with the priority action areas across the UK. The indicators are designed to measure progress with the Strategy's four priority action areas. DEFRA and National Statistics collate data to measure progress against these indicators and publish an annual summary report entitled 'Sustainable Development Indicators in Your Pocket - An update of the UK Government Strategy indicators'. It is unclear whether the revised priority action areas of the draft second Strategy will enable Northern Ireland to continue to make a meaningful contribution to the national indicators.

The Programme for Government 2008-2011 includes 23 Public Service Agreements (PSAs) that describe the key actions to be taken in support of the priorities, outcomes and targets to which government has committed under the five themes of:-

- Growing a dynamic innovative economy.
- Promoting tolerance, inclusion and health and well-being.
- Protecting and enhancing our environment and natural resources.
- Investing to build our infrastructure.
- Delivering modern high quality and efficient public services.

Annex one of the Programme for Government 2008-2011 provides detailed information on each of the PSAs including actions and targets. The Programme for Government also commits to putting in place a delivery framework, which establishes a robust and effective basis for monitoring and reporting of progress at a strategic level to, and by, the Executive. The Council recommends strongly that in developing appropriate indicators of sustainability, government should not simply replicate the abovementioned monitoring and reporting framework. Instead, it is suggested that OFMDFM will need to develop high-level overarching indicators that are able to reflect and summarise the social, environmental and economic contributions from the various public service agreements and present

them in a format that is both relevant to and understandable by all Sustainable Development Strategy stakeholders including the general public.

Question 8 - Do you agree that the draft Sustainable Development Strategy supports the delivery of the Executive's strategic priorities, as expressed in the Programme for Government? If you do not agree, please explain why and what alternatives you would propose.

Referring to the Programme for Government 2008-2011, the top priority has been identified as growing a dynamic, innovative economy. This is to be achieved by investing in our infrastructure, protecting and enhancing our environment and natural resources, delivering modern high quality and efficient public services and promoting tolerance, inclusion and health and wellbeing.

The Council agrees that the Strategy's objectives do support those of the Programme for Government but considers that in seeking to grow a dynamic, innovative economy, the draft second Sustainable Development Strategy should seek to incorporate the objectives of the 2009 UK Low Carbon Transition Plan - National strategy for climate and energy. The Low Carbon Transition Plan highlights that the transition to a low-carbon economy will be one of the defining issues of the 21st century but if delivered correctly, it will lead to a better quality of life, improved long-term economic health, new business opportunities in a fast-growing global sector, and, by reducing our reliance on fossil fuels, greater security of future energy supplies. Spotlight issues within the Plan include transforming our power sector so as to reduce our reliance upon fossil fuels; transforming our communities by reducing emissions from homes to almost zero through greater energy efficiency and the use of low carbon energy; transforming our workplaces and jobs to use less energy and making use of clean energy to reduce greenhouse gas emissions; transforming transport by using energy more efficiently and moving to more low carbon forms of energy; and transforming farming and managing our land and waste sustainably.