

WELSH LOCAL GOVERNMENT ASSOCIATION



Consultation Response: Sustainable Development Action Plan

The Association represents the 22 unitary local authorities in Wales, with the three national park authorities, the combined fire authorities, and the four police authorities as associate members. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities we serve.

The Association welcomes the opportunity to comment on the draft Sustainable Development Action Plan of the Welsh Assembly Government 2004-2007. Our response is divided into two parts: part 1 provides a general overview and part 2 contains detailed comments on the proposed content of the Action Plan as contained in the consultation draft.

PART 1: GENERAL COMMENTS

The Association acknowledges the foreword by the First Minister and welcomes the recognition that Wales now needs to move beyond discussion to delivery. The clarification that the Sustainable Development Action Plan will, once agreed, stand as a formal addition to Wales: A Better Country is also welcomed.

Whilst, in our opinion, much improved on the previous Sustainable Development Action Plan, the current draft Action Plan lacks clarity and focus. The role of the Action Plan is unclear and its format not action orientated. We are concerned that the Action Plan will be a 'toothless document' long on words and short on targets.

Research into the first Sustainable Development Scheme suggested that the Assembly Government needed to focus on key sustainable development challenges. The draft Action Plan, whilst containing much to commend it, does not for instance, focus sufficiently on one of our key challenges: the growth in traffic which, in Wales, has recently exceeded that in England. It could also be argued the Action Plan is weak on waste and health – two other key sustainable development challenges. We would suggest that the Action Plan provides a

clearer focus on the key sustainable development challenges that face Wales in the next four years and how the Assembly will seek to address these.

It is regretted that although Wales: A Better Country includes specific targets, this draft Action Plan contains very few. There should be timetables for the action points and, where appropriate, there should be specific targets that relate to the key sustainable development challenges (these might be new or a re-assertion of current targets such as the contextual targets for Carbon Dioxide emissions and traffic growth contained in the Objective 1 Single Programme Document). There is a need to move away from the themes of 'policy intent and review', the inclusion of timetables and associated targets will help avoid this. It has been proven that targets drive action and they make for meaningful reporting.

The Assembly has placed much emphasis on the policy integration tool as a means of 'joining-up' its policies and delivering sustainable development but, the practical impact has, in our experience, been patchy. We believe that the current Spending Review needs to have a firmer focus on sustainable development as, in your own words, 'money talks'.

Part 2: Comments on Detailed Contents of the Draft Action Plan

Living Differently

Climate Change

We welcome the aim of moving towards a 'low carbon' economy but believe that there should be a stronger emphasis on energy efficiency. This would dovetail with work on eradicating fuel poverty. The experience of the Association's members and other bodies (such as the WDA) is that sustainable design and build projects cost more to construct than traditional build but less to run. There is an urgent need to examine issues around 'investing to save' as there is a real risk, with reduced budgets, that energy efficiency and other sustainable design concepts will be priced out of specifications.

Whilst accepting that the public sector must be seen to lead in this area there would be merit in trying to get the private sector to agree to a 'sustainable development challenge'. For example, for the Assembly Government and the Association to jointly approach the Housebuilder's Federation and/or CBI to see if they will agree to such a challenge.

The lack of any discussion of what the Assembly Government is proposing to do in terms of emissions from transport is a serious omission given the significance of this sector to energy consumption and climate change. The Action Plan needs to make reference to published targets on reducing annual traffic growth to 0% by the final year of the Objective 1 programme and the aim to reduce Carbon Dioxide emissions by 20% (from 1990 levels) by 2010 and explain how these will

be achieved. The emphasis in the draft Action Plan on “*playing our full part in reducing the threat posed by climate change by moving to a low carbon economy*” would appear to be at odds to the Assembly Government’s proposed introduction of an intra Wales air service. This one example would seem to illustrate a lack of policy integration and an inability to consider alternative solutions.

Liveable Places

A key issue, across Wales, is housing - its affordability and quality – yet there is no discussion of this in the draft Action Plan. Achievement of the Welsh Housing Quality Standard could be an important lever for sustainable development. This is something that the Association, Assembly Government and WDA are currently researching and should be included in the final action plan.

Whilst accepting that there may be a need to review some aspects of current policy it is important that the Assembly Government adheres by current planning guidance rather than merely reviewing it. There is evidence, across Wales, that decisions taken by the Assembly Government against the wishes of local planning authorities are helping to fuel the need to travel, a good example is the development of retail outlets at Culverhouse Cross on the outskirts of Cardiff. These were opposed by the local planning authority but allowed by the National Assembly and former Welsh Office.

Our Natural Resources

The Association believes that the reforms to the Common Agricultural Policy which will be implemented from January 2005 provide an opportunity to forge a new ‘contract for the countryside’ with public subsidy more closely tied to the production of public goods. Cross compliance provides a useful vehicle for this and we would urge the Assembly Government to actively examine the scope for including landowners/occupiers legal duties over public rights of way within the cross compliance package. We believe that this would reduce the estimated £26 million needed to get public rights of way up to standard in Wales and provide important public health and wider economic development opportunities.

Sustainable Production

The Association supports the three action points identified but these focus on the production dimension and there is no detailed discussion of consumption. The Action Plan should also make clear the Assembly Government’s policy position in terms of non-devolved matters on production and consumption issues.

Leadership and Delivery

Creating Organisational Excellence

The emphasis on leading by example is to be welcomed and supported.

Delivering through our Agents

We support the emphasis on making sustainable development a driving principle for the Assembly Sponsored Public Bodies. In practice this will mean exploring some of the financial and other frameworks within which they operate. For example, we have been told by the WDA they have difficulty incorporating sustainable development principles into their construction projects because of the financial regime within which they operate.

Delivering through Local Government

We welcome the general thrust of this section and look forward to working in partnership with the Assembly Government to deliver a sustainable Wales. We are currently preparing a three year business plan detailing how a sustainable development framework for local government in Wales might be developed which will be submitted to the Welsh Assembly Government for funding shortly.

Delivering with Partners

We support the commitment to work in partnership. It is important that the emphasis of any virtual centre for sustainable development is on practical delivery rather than theoretical discussion.

Wales: A Global Citizen

Whilst supportive of the international dimension of the Assembly Government's work on sustainable development, the Association is keen for the expertise that exists in the Sustainable European Regions Network and NRG4SD to be shared more widely.

The Assembly's commitment 'to becoming a Fair Trade country' needs further explanation. What will this mean in practice? Does it have implications for partners? What is the proposed timetable?

Promoting Awareness and Leadership

Whilst recognising the need for real leadership on sustainable development we have concerns about the practical value of Cynnal Cymru's Executive Leadership Programme. This needs to be integrated with the Public Sector Management Initiative (which is wider than the Assembly) and consideration given as to how you attract key persons onto the course.

How does the proposed focal point for best practice on sustainable development relate to the proposed virtual centre discussed on page 19?

Education for a Sustainable Future

We support the emphasis on education but would urge that this section is expanded to consider informal education. We need to find new ways of engaging with society at large so that they can 'start to live differently'. The proposed

national media campaign on waste awareness is a good example of the sort of targeted action that the Assembly Government can promote.

Making Our Money Talk

Procurement

We support the emphasis on procurement but would suggest that as well as guidance we need practical information, resources and commitment:

Practical information – at present it is difficult to determine what constitutes sustainable procurement. For example, is it best to buy office furniture made from chipboard manufactured in Wales or from FSC wood and manufactured in Sweden? There needs to be a centralised source of information on the ‘whole life costs’ of key products purchased by the public sector and clear processes for determining what constitutes sustainable development within a procurement context.

Resources – as discussed above, sustainable design and build can cost more than traditional techniques: a higher capital cost with potential revenue savings. There is a need to examine the issue of investing to save in more detail. In a climate of reduced financial resources (witness the Assembly’s Spending Review and the Gershon Review in England) there is a risk that value for money arguments will undermine wider concerns about sustainable development.

Commitment – one of the key barriers to innovative approaches to procurement is a concern that you will be opening yourself up to legal challenge. The Assembly Government needs to commit itself to standing ‘shoulder to shoulder’ with authorities that follow guidance on sustainable procurement. The risk (be it real or perceived) needs to be shared.

Grants

We welcome the focus on sustainable development as an outcome but would urge the Assembly to ensure that this does not result in increased bureaucracy.

Food

We support the idea of using food procurement as a potential case study. Many local authorities are already delivering this agenda and we would suggest that Assembly officials discuss this area further with authorities such as Powys, Carmarthenshire, Caerphilly, Rhondda Cynon Taf and Ceredigion.

Estates Management

As noted above, we support the work of the Assembly Government to become an exemplar in terms of sustainable estate management.

Measuring Our Progress

Monitoring and Reporting

Monitoring should be against stated objectives and defined targets.

Indicators

It is important that work on the indicators is brought to a rapid conclusion. This work now needs to dovetail with the Welsh Assembly Government, WLGA and Audit Commission in Wales performance measurement review and local authority work on Quality of Life indicators. Targets should be linked to the indicators so the 'direction of travel' is clear and progress can be monitored (see above).