



**Chartered
Institute of
Environmental
Health**

Submission to Welsh Assembly Government

**Consultation on the Sustainable
Development Action Plan 2004-2007**

**Chadwick Court
15 Hatfields
London
SE1 8DJ
United Kingdom**

Tel: + 44 (0)20 7928 6006
Fax: + 44 (0)20 7827 5831
Website: www.cieh.org.uk

May 2004

THE CHARTERED INSTITUTE OF ENVIRONMENTAL HEALTH

Founded in 1883, the Chartered Institute of Environmental Health (CIEH) is a professional and educational body, dedicated to the promotion of environmental health and to encouraging the highest possible standards in the training and the work of environmental health professionals.

The Chartered Institute has approximately 9,500 members, most of whom work for local authorities in England, Wales and Northern Ireland. As well as providing services and information for its members the Chartered Institute provides information to government departments and evidence to them on proposed legislation relevant to environmental health.

In 1993 the Chartered Institute became the World Health Organisation Collaborating Centre for Environmental Health in Europe.

In 2002 the Chartered Institute established a regional office in Wales in order to facilitate direct liaison with the National Assembly for Wales, local authorities and non-governmental organisations within Wales, promoting and representing Chartered Institute of Environmental Health policies in a Welsh context.

The CIEH welcomes the opportunity to comment on this important consultation. Our response is divided into two parts, the first part provides our general response to the consultation document, the second gives our detailed response to the proposed content of the draft Action Plan.

Part I : General Response

The CIEH welcomes the status to be given to the Sustainable Development Action Plan, considering that the fact that it will stand as a formal addition to Wales: A Better Country will ensure that it is attributed standing and weight.

We are however concerned that the Action Plan is not sufficiently clear and is not focused. For an Action Plan to be effective it must have clear targets, but we do not feel that there are clear targets to drive improvement in the Action Plan in its current form. The Action Plan should contain clear and unequivocal targets, which should not be wrapped in aspiration text.

In the view of the CIEH the three 'wicked' sustainable development issues that should be given priority in Wales and should be tackled by the Action Plan are health, reduction of waste and the reduction of private car use. We are disappointed that the draft Action Plan does not give sufficient consideration to these issues. Whilst health and the reduction of waste are considered we do not feel that they are given sufficient weight. Reduction of private car use and the promotion of integrated transport schemes does not receive sufficient attention, although it is clear that this will be one of the most challenging issues for Wales during the period of the Plan.

We would like to see the Action Plan clearly identify those issues that are regarded as the key sustainable development challenges for Wales and outline how the Welsh Assembly Government will seek to address them. In resource scarce times it is essential in our view that a clear lead is given as to those issues to which highest priority attaches.

Many of the Plans which have come out of the Assembly in recent years, including Wales : A Better Country have contained very specific targets, which have been easily understood, and which, taking pragmatic stance, have been followed by resource to ensure they are achieved. It is the view of the CIEH that the 'policy intent and review' themes deflect from clarity of understanding, and that clear timetables and specific targets would be of far greater value to those who will be required to deliver sustainable development improvements and to report on what they have achieved. Where arguments for resource have to be made and considered clear and understandable targets allow for quantification, and further allow for accurate monitoring of the effectiveness of the intervention. In our view the addition of clear and specific targets would very much strengthen the Action Plan.

It is also our view that an opportunity to promote the use of Integrated Impact Assessment as a sustainable development tool has been lost. Much good work has been put into the development of the tool, and it is imperative that its use is promoted as a mechanism for maximizing sustainable improvements in health and reductions in health inequalities, which are the keystones of sustainable development.

Part 2 Specific Responses

2.1 Living Differently

Climate Change

The CIEH welcomes and endorses the ambition of the Action Plan in moving towards a 'low carbon' economy. The CIEH itself has undertaken research into fuel poverty, and believes that any steps towards a 'low carbon' economy should be linked to work to eradicate fuel poverty.

Given the contribution of vehicle emissions to environmental pollution and climate change the fact that there is no discussion in the Action Plan as to what steps are proposed to reduce reliance on the private car and to improve public transport is a serious omission. The Action Plan should make reference to published Integrated Transport Strategies and to published targets on reducing annual traffic growth and Carbon Dioxide emissions.

We also question how economic development initiatives, such as the proposed introduction of an intra Wales air service, can sit with a sustainable development policy requiring a reduction in energy consumption and carbon emissions. We suggest that such contradictions would lend themselves well to consideration through the Integrated Impact Assessment tool, to which reference appear in our comments to Part 1, and would also ensure policy integration. It would be preferable to improve Information Technology links facilitating communication in Wales rather than introducing new transport links, with the inevitable environmental detriment that attaches to them.

We agree that energy efficiency should be one of the considerations in the design and build of new premises, both domestic and industrial, in Wales. We accept that the private sector may not embrace this suggestion, its judgement being coloured by commercial, rather than sustainable development considerations, however we do not believe that this should deflect the ambition. We further take the view that the public sector to take a leadership role in this regard.

We consider that organisations such as Registered Social Landlords, the National House Builders Federation and the National Confederation of Mortgage Lenders have a role to play in making energy efficient development something desirable to consumers, to be viewed as a selling point. There is anecdotal evidence from those commercial concerns, such as the CRS, that ethically guided policies can influence consumer choice – there is no reason to believe that consumers will not be influenced by sustainable development benefits in the same way.

Liveable Places

There are two key housing issues that the Action Plan does not address. The first is the affordability of housing, particularly for those attempting to enter the housing market, the second is the breakdown of rural communities due to house prices and the closure of community facilities such as shops and Post Offices. We believe the plan should reflect the need to encourage rural diversification, maintaining and promoting rural communities and preventing the drift of their populations.

We agree that there may be a need to review planning policy, but we are clear that where planning policy has been designed by a Local Planning Authority to address local need, and has been reviewed through the Unitary Development Plan process it should be definitive other than for compelling reasons of national significance. The process of 'planning by appeal' should be discouraged, as it is generally site or location specific and does not consider wider sustainable development issues, that are a consideration in the wider planning policy development process.

We endorse the use of Strategic Environmental Assessment and of promoting sustainable development through planning briefs.

Our Natural Resources

The CIEH is in general agreement with the proposals in this part of the plan, but would note that in our view it is imperative that incentives that encourage overproduction of goods or crops should be discontinued. We endorse the view that the Single Farm Payment should only be paid where there is clear evidence that farmers protect soil, water and air and biodiversity.

The CIEH has welcomed the advent of Health Challenge Wales, and believes that the Sustainable Development Action Plan should reflect where possible its aspirations. The countryside of Wales is a health resource, as it can be used for physical activities such as walking, mountain biking and water based sports without detriment to the physical environment. There should be acknowledgement of this in the Action Plan, as well as acceptance that where use of the countryside can have adverse effects, such as off road use by motor vehicles, such use will be restricted to areas where damage can be minimised.

We support the ambition to implement the Woodland Strategy, and particularly endorse the need to replant felled areas with regionally appropriate species and encourage the achievement of specific and measurable ecological objectives.

Sustainable Production

Whilst we accept that some of the matters that influence production and consumption are non-devolved and therefore may not be directly influenced by the Assembly Government, we are clear that there is an important role for the Assembly Government in leading, advocating and influencing in this regard. We support initiatives such as the *Green Dragon Scheme*, but suggest that such schemes need aggressive marketing and promotion to ensure public recognition of and value for them.

2.2 Leadership and Delivery

Creating Organisational Excellence

We welcome and support the stated intention of the Welsh Assembly Government to pursue excellence and to mainstream the principles of sustainable development in all that it does. We however note that it is essential that the policies of the Assembly Government are fully integrated, to ensure that policy conflicts such as that requiring a low carbon economy and that promoting and intra-Wales air service to which reference is made earlier in this response do not arise. Such conflicts undermine the commitment and lead to public disillusion and disengagement.

Delivering Through Our Agents

We welcome and endorse the emphasis on making sustainable development a driving principle for Assembly Sponsored Public Bodies (ASPBs). We would suggest that ASPBs should be required to use the Integrated Impact Assessment tool when developing proposals to ensure consistency of approach and maximisation of return in sustainable development terms.

Delivering Through Local Government

Local Government has already begun to make a major contribution to the promotion of sustainable development through the power and the duty it has, and through Community Strategies. This is to be encouraged and to be celebrated as best practice to encourage other bodies which do not have the same duty and power to act in the same way.

Delivering With Partners

We support the commitment of the Welsh Assembly Government to work in partnership. We also support the idea of promoting best practice and shared learning.

Wales: A Global Citizen

We support the concept of Wales learning from and teaching other Nation States, but draw attention to the need to disseminate information and learning as widely as possible. All of those identified as partners in the Action Plan must be able to learn and benefit from the experiences of other countries and it is critical that the virtual network to which reference appears in discussion regarding partners and those links that exist with ASPBs and Local Government are exploited to ensure the widest possible dissemination of information.

Promoting Awareness And Leadership

CIEH agrees that there is a need for real leadership on sustainable development, but would advise that any training offered should be offered as widely as possible. It must go outside the Assembly to ASPB staff, officers of Local Authorities and NGOs.

Education For A Sustainable Future

CIEH agrees with the content of this part of the Draft Action Plan.

2.3 Making Our Money Talk

Procurement

Given the considerable spending power of the Welsh Assembly Government and of ASPBs we support the emphasis on procurement.

Grants

We welcome the focus on sustainable development as an outcome, but would urge the Welsh Assembly Government to ensure that the process of applying for the grants or bidding

for similar types of funding does not become so burdensome as to preclude their take up. If the application process is too complicated or expensive to undertake in itself there will be poor levels of grant take up – the issue is that grants should be accessed and used as a resource rather than avoided as an undesirable intellectual and administrative challenge.

Food

There are a number of Environmental Health Departments and Local Health Boards that have made great strides in the field of local food procurement, and the CIEH supports their activity. Ceredigion and Powys are cases in point.

We refer to our earlier comments on rural diversity and the need to keep rural communities viable and would urge the Welsh Assembly Government to use local food procurement and support for local food initiatives such as farmers markets as mechanisms for promoting and maintaining rural life in Wales.

Estates Management

CIEH supports the Welsh Assembly Government in its work to become an exemplar in this regard.

2.4 Measuring Our Progress

Monitoring and Reporting

In our comments to Part 1 CIEH was critical of the lack of clear and focuses targets in the Action Plan. If monitoring and reporting is to be meaningful it is essential that targets are clear and measurable. These targets should be published for consultation at the earliest opportunity

Indicators

CIEH has no additional comment to make with respect to this part of the consultation.

The CIEH would be happy to clarify or expand upon any points arising from this response, and to comment upon any further proposals on this subject.