



House of Commons
Environmental Audit
Committee

**Embedding sustainable
development across
Government, after the
Secretary of State's
announcement on the
future of the Sustainable
Development Commission**

First Report of Session 2010–11

Volume II

Additional written evidence

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Environmental Audit Committee

The Environmental Audit Committee is appointed by the House of Commons to consider to what extent the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development; to audit their performance against such targets as may be set for them by Her Majesty's Ministers; and to report thereon to the House.

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The constitution and powers are set out in House of Commons Standing Orders, principally in SO No 152A. These are available on the internet via www.parliament.uk.

Publication

The Reports and evidence of the Committee are published by The Stationery Office by Order of the House. All publications of the Committee (including press notices) are on the internet at www.parliament.uk/eacom. A list of Reports of the Committee in the present Parliament is at the back of this volume.

The Reports of the Committee, the formal minutes relating to that report, oral evidence taken and some or all written evidence are available in a printed volume.

Additional written evidence may be published on the internet only.

Committee staff

The current staff of the Committee are Simon Fiander (Clerk), Edward White (Second Clerk), Lee Nicholson (Committee Specialist), Andrew Wallace (Senior Committee Assistant), Susan Ramsay (Committee Assistant), Emily Harrisson (Sandwich Student) and Nicholas Davies (Media Officer).

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Written evidence

Written evidence submitted by DEA and Oxfam

1. ABOUT DEA

1.1 DEA is an education charity that promotes global learning. We work to ensure that people in the UK learn about global issues such as poverty and climate change and develop an open-minded, global outlook. DEA defines global learning as education that puts learning in a global context, fostering:

- critical and creative thinking;
- self-awareness and open-mindedness towards difference;
- understanding of global issues and power relationships; and
- optimism and action for a better world.

1.2 DEA is a membership body, with over 150 organisational members including subject associations, universities, local authorities and many development and environment NGOs in the UK.

1.3 DEA is submitting this evidence in partnership with Oxfam. This submission has been developed in consultation with Oxfam's UK campaigns department, and represents the views of both organisations.

2. SUMMARY

2.1 We recommend that:

- The Environmental Audit Committee inquiry focuses on the role of Government in promoting awareness and take-up of sustainable development throughout civil society, as well as focusing on the government's own operations or estate.
- To facilitate this wider role, the inquiry considers how the architecture of government can be more effectively coordinated across departments, taking the draft Global Learning Strategy for Schools as an example of a useful mechanism for coordination.
- Specifically with regard to putting sustainability at the heart of education, the inquiry explores how the Department for Education can build on the legacy of the successful National Framework for Sustainable Schools to support all schools to become sustainable schools.

3. ANALYSIS AND RECOMMENDATIONS

3.1 **We welcome the Environmental Audit Committee's inquiry** into embedding sustainable development across Government, and the implied interest of the new Government in bringing sustainability to the heart of their work.

3.2 However, we note the emphasis of the call for evidence on the practical operation of Government: procurement, operations, reporting etc. Whilst it is crucial that Government models sustainable practice and works to reduce the impact of its operations on the environment, we believe that **being "the greenest government ever" must mean more than sustainable operations.**

3.3 One of the crucial roles of the Sustainable Development Commission was in promoting awareness of the concept of sustainable development throughout civil society, and it is essential that Government continues to play a role in this.

3.4 A good example of a way in which Government can promote awareness of sustainable development is the National Framework for Sustainable Schools, a voluntary framework supporting schools to transform the experiences and outcomes of pupils whilst improving the environmental performance of the school and contributing to sustainable communities.

3.5 A whole-school commitment to sustainable development has been found to have a range of positive impacts, on sustainable lives, pupil outcomes, and campus operations. Encouraging and supporting schools throughout the country to put sustainability at the heart of what they do has, and will continue to have, a far greater impact than changes to the Department for Education's own operations and estate.

3.6 A report by Ofsted¹ found that pupils who had the opportunity to explore issues of sustainability at school *"tended to lead sustainable lives at home and there was increasing evidence of this leading to positive changes in their families' views and behaviour. The commitment, enthusiasm and initiative of young people were also a spur to members of the wider community to re-examine their own lifestyles"*.

3.7 In addition, the report indicated that in schools committed to sustainability students experienced a range of other positive outcomes, including improved attitudes, behaviour and engagement, in addition to experiencing improved teaching: *"Most of the headteachers found that, over the course of the survey, education for sustainability had been an important factor in improving teaching and learning more generally. This was confirmed through lesson observations in a range of subjects across the sample of schools visited"*.

¹ Ofsted, 2009, *Education for sustainable development*, Manchester:Ofsted.

3.8 A focus on sustainable development was also found to “lead to reduced financial costs and better management of resources and estate”.

3.9 Fulfilling its role to promote sustainable development requires more effective coordination of the architecture of government. A good example of such mechanisms is the draft joint DFID/DfE Global Learning Strategy for Schools. In developing this shared vision, government departments came together to consider how their work can jointly support young people to engage with global challenges such as sustainability. This joint vision offered the potential for both financial savings through the rationalisation of government support, and greater impact on sustainable development through a coherent and coordinated offer from both departments.

3.10 We therefore recommend that:

- The Environmental Audit Committee inquiry focuses on the role of Government in promoting awareness and take-up of sustainable development throughout civil society, as well as focusing on the government’s own operations or estate.
- To facilitate this wider role, the inquiry considers how the architecture of government can be more effectively coordinated across departments, taking the draft Global Learning Strategy for Schools as an example of a useful mechanism for coordination.
- Specifically with regard to putting sustainability at the heart of education, the inquiry explores how the Department for Education can build on the legacy of the successful National Framework for Sustainable Schools to support all schools to become sustainable schools.

8 October 2010

Written evidence submitted by Chartered Institute of Water and Environmental Management

1. The Chartered Institution of Water and Environmental Management (CIWEM) welcomes the opportunity to comment on the Environmental Audit Committee’s inquiry on embedding sustainable development across Government (we contend that the correct term should be “sustainability” because “development” has strong connotations with economic growth; the basis of the current global economic model which seeks to attain perpetual economic growth and which in a finite world is, by definition, unsustainable).

2. The extent of the (Coalition) Government’s commitment to sustainability is far from clear. Thus far, political rhetoric concerning “the greenest government ever” and “driving the sustainability agenda across the whole of government” is not being reflected in practice and the swift announcement of the decision to end funding of the Sustainable Development Commission (SDC), which was a highly cost efficient “critical friend” of Government, and which demonstrated significant progress and delivered many tens of millions of pounds of efficiency savings, appears ruthless, ideological and ill-considered.

3. The Government, having taken such action and made such pronouncements, has placed itself in the position of needing to make real improvements to the integration of sustainability thinking and practice across its departments, if it is not to be seen as reckless with the interests of future generations. If the pronouncements are based on genuine intent, then CIWEM considers such action to be bold. However, the functionality of the SDC must now be implemented from the spearhead of Government (i.e. the Cabinet Office, which can take an overview across Government and can hold other departments to account) and its principles taken up by traditionally hostile departments such as the Treasury and BIS. CIWEM believes that with the appropriate level of political will, there is no reason why Government could not drive forward the sustainability agenda significantly; the reality of the past is that Governments didn’t have this will, which is one reason why the SDC was created.

4. Our remaining comments are set out in answer to the questions posed by this inquiry.

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

5. The best mechanisms to ensure the sustainability of Government operations, procurement and policy-making rely on the quality and integrity of the Government politicians and their supporting civil service. Very few politicians have the necessary training to understand their role in sustainability, whereas civil servants can develop sufficient knowledge in their area if given adequate training to provide the necessary guidance to politicians.

6. Currently there is a pronounced lack of consistency in the way that sustainability principles are worked into Government operations, procurement and policy-making. Different departments appear to have entirely different approaches to “sustainable” procurement. There is a need to introduce consistent procedures and standards across departments to ensure that a consistently high standard procurement approach is adopted.

7. In relation to other, more specific activities, there is a need to ensure that awareness and training of civil servants is relevant to an individual’s role. Depending upon activity, one size will not fit all and there will be a major professional development undertaking required to ensure that all civil servants are properly aware of what sustainability means, and requires. Currently, this required level of understanding is almost non-existent. There is also a clearly persistent ideology present in many central tiers of Government (for example the

Treasury), that the environment and sustainability issues are little more than “nice to haves” and way down the hierarchy of importance below immediate concerns of economy, health, security etc. In fact, the environment is, or will be, a crucial component of all of these concerns. A clear example is the economic decisions associated with coastal protection or “managed retreat” which clearly affects environmental and social issues but the dominant element is economic. Government needs to put greater weight on the aspects for which it is not possible at present to put economic value.

How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

8. The SDC played an important role as a watchdog, assessing Government performance on sustainability and holding it to account as necessary. This independent policing role has been lost and it must be replaced by similar functionality elsewhere. The importance of independence in auditing the Government’s own performance is significant, if its policies (which may need to be stringent) are going to hold credibility.

9. Governance arrangements for sustainable development in Government could be improved through focussing on sustainability outcomes by setting out the potential effect on the three tenets of sustainability (environmental, social and economic), rather than the current results-based sustainability reporting. This might be done by raising the profile and improving the process of Sustainability Appraisal, which currently languishes in planning and gathers dust once completed.

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

10. The SDC’s remit was fourfold: Advisory, capacity-building, advocacy, and watchdog. As an advisory body and advocator, it drew on independent experts to consider issues that challenged conventional thinking and helped to feed them into policy. The contribution that the SDC made to policy and decision-making can readily be brought back into Government, and may indeed have greater impact in such a setting than if promoted by a small, independent body which could be held at arm’s length if required.

11. As an advisor, capacity-builder and watchdog, the SDC oversaw improvements in efficiency (resource use and waste reduction) which, according to its most recent report, amounted to between £60 and £70 million per year. Such figures will have been heavily quoted by critics of the decision to end its funding, but the cost effectiveness of this body for an annual cost to the taxpayer of around £4 million (including the contributions made by the devolved administrations) makes its removal hard to fathom. Even more so when in its most recent report it had identified hundreds of millions’ worth of additional savings that could realistically be made, and will have to be made by the current Government if it is indeed to mainstream sustainability.

12. CIWEM agrees that now is the time to implement major change by properly mainstreaming sustainability into all aspects of the Government’s work. However, before that, it is important that mainstreaming is thoroughly understood and the barriers to it removed. It is arguable that the SDC had the expertise as its disposal to lead this mainstreaming process. This may need to be delivered from a position of greater influence within Government in order to provide it with the necessary political “clout”. For this reason, CIWEM would recommend that this pool of expertise is integrated within the appropriate tiers of Government, affording it the influence required to overcome the many ideological barriers that will be faced in order for sustainability to be mainstreamed.

In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (e.g. to develop “sustainability reporting” in departments’ accounts) and the contributions that other bodies might make (e.g. Centre of Expertise in Sustainable Procurement)?

13. The primary barriers to effective implementation of sustainability principles are the boundaries which exist between departments. This silo effect and the inability to effectively consider cross-boundary opportunities results in the limitation of many strategic decisions to achieve sufficient positive sustainable benefits.

14. There is potential to create clear linkages between issues such as policy, procurement and implementation by establishing a cross-cutting review process which would identify key sustainability issues of relevance to the whole of government, with the aim of identifying aspects which need to be dealt with, either directly or through another particular department.

How, without the assistance of the SDC, will the Government be able to demonstrate that it is “the greenest government ever”?

15. If the Government is serious about being judged against this claim, it is going to have to open up its own performance to independent scrutiny. Whether this is undertaken by a specific sustainability regulator which takes on the SDC’s watchdog role, or a more central Government auditing body, is clearly for discussion. It may be possible for this role to be provided by the Environmental Audit Committee, or an offshoot thereof (e.g. a new Sustainability Audit Committee). Alternatively, the National Audit Office may be appropriately placed to take on this role. Much will depend on how Government is prepared to be held to account and how it will react to the results of any auditing. In light of its comments that “transparency is the new accountability”, it should be prepared to be scrutinised.

16. The Government will also need to demonstrate a sound understanding of the issues surrounding sustainability, and incorporate these into its policymaking. “The greenest Government ever” is a serious claim, and a serious target. The previous Government, whilst not achieving anywhere near as much as is required to move the UK onto a sustainable footing, did put in train a number of frameworks and introduce policies which moved things in the right direction. Current indications are that the present Government is not moving forward from this position, but if anything risk moving backwards.

17. The first step will be to move the tax regime more towards rewarding sustainable living and sustainable businesses. There are many opportunities for businesses to help their employees to become more sustainable, but these are blocked by archaic notions of “taxable benefit” and therefore clamped down on by the Treasury. Economic benefit is still the main driver for individual choice and this same measure has to be applied to rewarding a sustainable lifestyle if behaviour change of the scale required is to be achieved.

18. Many of the actions required are detailed in CIWEM’s Manifesto for Environmental Action, published in November 2009. We refer the Committee to this document.
([http://www.ciwem.org/FileGet.ashx?id=977&library=Public Access](http://www.ciwem.org/FileGet.ashx?id=977&library=Public%20Access))

11 October 2010

Written evidence submitted by the Royal Society for the Protection of Birds

The Royal Society for the Protection of Birds (RSPB) is the charity that takes action for wild birds and the environment. We are the largest wildlife conservation organisation in Europe with over one million members.

SUMMARY

Protecting the natural environment is core to sustainable development, but in the UK and in England we are still failing to put this into practice. The situation is worrying: species continue to decline, priority habitats and protected sites remain impoverished, carbon dioxide emissions are not being cut fast enough, and water consumption is unsustainable. Embedding sustainable development in Government is essential if the coalition is to achieve its ambition to be “the greenest Government ever”.

- The loss of the Sustainable Development Commission is premature and its role and responsibilities must be taken on within Government and Parliament.
- Sustainable development must be dealt with at the highest level of Government.
- Short term spending cuts must not jeopardise the transition to a sustainable economy.
- Environmental limits must be defined.
- Policy decisions must be supported by a robust evidence-base and coherent across Government departments and sectors.
- Decision-making should be inclusive and encourage the participation of environmental (as well as social) partners.
- Policies must be assessed for their environmental impacts and subsequent delivery subject to public scrutiny and accountability.
- The Government must be prepared to intervene to enable the country to live within environmental limits.
- The SDC’s work on education for sustainable development is of continuing importance, and the Government must continue to support this aspect of work.

EMBEDDING SUSTAINABLE DEVELOPMENT IN GOVERNMENT

1. Nature matters. It has an intrinsic value, people’s wellbeing depends upon it and its raw materials underpin our economy. Sustainable development is an issue because it is accepted that current levels of consumption and production (locally and globally) cannot be sustained indefinitely. In recognising this fact we have to act upon it. Change must be led from the highest levels of Government, within the Cabinet Office or Treasury (for matters reserved for England), urgently. All Government departments and public bodies must be answerable for their progress towards the sustainability of operations, procurement and policy-making. In this response, we focus on the requirements for improved policy-making.

2. The twin goals of sustainable development have been defined as living within environmental limits and securing a healthy, just society. Given that the new UK Government has, through its planning reform proposals, proposed a presumption in favour of sustainable development, it is appropriate to either confirm this definition or establish a new one to aid decision-making.

3. The current economic climate and justifiable concern over public debt is preoccupying Government thinking. There have been casualties already (notably the Sustainable Development Commission) and the spending review is set to unleash a further rash of cuts across departments and sectors. However, these short term gains in the book balance must not undermine efforts to steer England and the UK towards a sustainable economy. It is important that the purpose of development now and in the future is to achieve genuine

improvements in environmental, social as well as economic wellbeing. Health, social and environmental indicators should be used to measure national progress.

4. The UK Government and devolved administrations share the principle that we must live within environmental limits. This is a non-partisan position, intrinsic to sustainable development and should be core to Government strategy. Limits need to be defined. Governments tend to define environmental limits in targets and laws to safeguard the natural environment at different geographical levels. While these commitments are not in themselves sufficient to prevent environmental limits being exceeded, they do provide a useful reference point to assess Government progress. The RSPB supports a target-led approach because they provide a focus for action, encourage scrutiny and ensure accountability.

5. Decision-making within Government should be based on a robust evidence base. It is important that the Government provides adequate funding to research the state of the natural environment, for example, on the location of key species and the condition of local wildlife sites. Where research has been undertaken, it should be publicly accessible and inform policy development. This point overlaps with our concern about finding a new home for regional environmental, economic and social data, which needs to be “owned” and kept up to date by appropriate groupings.

6. If policy-makers do not understand how policies will affect the natural environment, they should adopt a precautionary approach and invest in further research. Improving the monitoring and dissemination of information can result in better decision-making. For example, with funding from Scottish Natural Heritage, RSPB Scotland produced a bird and wind farm sensitivity map. The map helps developers and local authorities to identify those areas where wind farms would pose a medium to high risk to important bird populations in Scotland. It is hoped this will help to minimise the conflict by enabling developers to avoid the most sensitive sites.

7. Policies across Government should be coherent. For instance, aviation expansion would not consistent with aspirations to move towards a low carbon economy, and the use of palm oil to meet UK biofuel targets continues to be the cause of tropical deforestation. These two examples underline the need for cross departmental (or sector) communication and cooperation and illustrate the scale of the challenge in terms of behavioural change within Government and policy reform.

8. Nature has no voice. Organisations like the RSPB speak for it. Government and public authorities need to adopt an inclusive approach when developing and implementing policies, to encourage the participation of environmental partners. Increased engagement and participation of environmental partners helps to improve the quality, relevance and effectiveness of Government policies. It ensures that socio-economic concerns are addressed alongside economic issues.

9. Unless public bodies are called to account for their failure to meet environmental targets or commitments, sustainable development will be compromised. The building blocks of scrutiny include obligations to monitor and report on progress supported by independent bodies charged with holding the authority to account. In the absence of the Sustainable Development Commission, perhaps the only credible alternative is that this role is taken on by Parliament. The bottom line is that scrutiny and accountability arrangements must have teeth.

10. The true value of the natural environment should be fully assessed and taken into account when developing and implementing policies. Tools, such as regulatory impact assessment, strategic environmental assessment (SEA), and cost-benefit analysis can ensure that environmental considerations and policies are integrated into all policy and decision-making at an early stage. Without a full and thorough consideration of the costs and benefits, well intentioned policies can result in unforeseen outcomes (e.g. the impact of palm oil, described above).

11. More than 100 duties have been established requiring public authorities to “contribute to” or “have regard to” sustainable development or nature conservation. Some work better than others, depending on the appetite of those in authority. We cannot afford not to take sustainable development seriously. The coalition Government must be prepared to intervene through fiscal, policy and regulatory reform to help the country live within environmental limits.

THE ROLE OF THE SUSTAINABLE DEVELOPMENT COMMISSION

12. In 2009 the previous UK Government and devolved administrations confirmed that the Sustainable Development Commission’s (SDC) three strategic aims were to:

- build organisational capacity within Government, to enable sustainable development to be put practice in policies and programmes;
- achieve breakthroughs in policy areas with the greatest immediate impact on progress towards sustainability, and
- to hold Government to account for its progress towards delivering sustainable development, and to mainstream a scrutiny role within other public sector monitoring and audit bodies.

13. In 2010, while progress has undoubtedly been made, none of these critical objectives can be said to have reached a natural end. All remain of continuing importance. The SDC has acted as advisor, advocate and as a critical friend to the UK Government and devolved administrations. It has done this as an independent body

outside Government (a non-departmental public body) able to push the Government in the right direction. It is difficult to see where the impetus will come from within the coalition Government to do this by itself. As discussed above, Parliament should perhaps take on some of its scrutiny function.

14. The SDC's work programme covered ten policy areas: climate change, consumption, economics, education, energy, engagement, health, housing, regional and local government and transport. The Government should continue to fund and oversee projects in each policy area, taking into account: knowledge gaps in government, new policy initiatives, contentious issues and technological innovations. In essence, the SDC's role is still needed, its work is still very relevant and this element could be taken on within Government. The Cabinet Office or Treasury, not Defra, should be the responsible department in keeping with the gravity of the issue and its cross-cutting nature.

EDUCATION FOR SUSTAINABLE DEVELOPMENT

15. In 1999, the Panel for Education for Sustainable Development's (ESD) report "Education for Sustainable Development in the Schools Sector" made recommendations to the then DfEE and Qualifications and Curriculum Authority (QCA) as to "what education for sustainable development looks like in practice, in terms of learning outcomes." The DCSF launched the National Framework for Sustainable Schools in 2006, with the aspiration that all schools in England be sustainable by 2020. Underlying the framework are three widely cited competencies of care; for oneself, for each other, and for the environment.

16. In July 2009, the SDC's Breakthroughs Project identified the ideas with the most potential for tackling climate change, resource depletion and inequality in the 21st century. Natural Values, an idea promoting outdoor experiences for all children in the UK to develop the values, knowledge and understanding that underpin sustainable lifestyles, was submitted by lecturers at the University of Cumbria and selected by the SDC as one of the final 19 breakthrough ideas. Alongside the Natural Values idea, the SDC showcased RSPB Rainham Marshes as delivering precisely the type of learning in the natural environment that children need to confront the challenges of 21st century. Speaking at the time, Jonathon Porritt, then SDC Chair, said:

"If we're to be suitably ambitious about how the environment contributes to young people's well-being, and how young people contribute to the well-being of the environment, we should aim to make outdoor experiences a sixth objective in the Every Child Matters Framework."

17. The benefits to schools and children have been reported by Ofsted—the schools inspectorate in England—on a number of occasions over recent years:

- In May 2008, "Schools and sustainability: a climate for change" recommended that the DCSF and QCA "should ensure that the curriculum reflects the importance of learning about sustainability [and] stress the importance of education for sustainability as part of a broad and balanced curriculum."
- In December 2009, "Education for sustainable development: improving schools—improving lives" recommended that schools should "ensure that all pupils have access to out-of-classroom learning to support their understanding of the need to care for their environment and to promote their physical and mental well-being."
- In August 2010, "To sustainability and beyond: inspecting and reporting on progress in sustainable development" sets out how Ofsted will be "integrating sustainable development principles into our strategic planning and performance management frameworks and our core business activities of inspection and regulation."

18. Despite the crucial role that education plays within enabling sustainable development—and evidence of the diverse impacts on children's learning and more widely in society—the Department for Education has indicated that it will no longer support the Sustainable Schools framework. Progress has been made over the last decade in establishing ESD in many schools, along with Ofsted's recent statement of intent to embed this across their work. The role of the SDC in enabling these advances in schools (as well as supporting local authorities, NGOs, and the Government) has been pivotal. To ensure that ESD is taken up by all schools, this area of work must be considered as an aspect of the SDC's work which remains of particular continuing importance. The Government must send a clear message of support to schools (and all organisations working in this area) to reflect the importance of ESD for sustainable and environmentally-responsible future.

Written evidence submitted by Waterwise

SUMMARY

- Waterwise recognises the driver of reducing the deficit, but regrets the withdrawal of funding from the SDC, whose annual budget is far outstripped by the savings it identifies for Whitehall through sustainability measures.
- It will be essential to retain at least some of the SDC's functions.
- Some can be fulfilled within government, but measures will need to be put in place to seek to ensure they are effective.
- Some functions can be fulfilled at best value through the third sector.
- Measures need to be taken to fulfill the specific potential of water efficiency in the sustainability of the government estate.

SUBMISSION

Overview

1. Waterwise recognises that “reducing the deficit is the priority for the Government and all departments are playing their part in making efficiency savings”, as reiterated by the Secretary of State in the statement she made withdrawing funding from the Sustainable Development Commission on 22 July.

2. However, Waterwise regrets the withdrawal of funding from the SDC, which fulfills a vital “watchdog” role, identifying and monitoring sustainability actions in government which are essential both if the Coalition Government is to fulfill its commitment to be the “greenest government ever”, and to help cut the deficit. The SDC has also in the past performed a role of cross-governmental “banging heads together”, where Departments have become entrenched in their views (which can happen in any government), and it is to the previous government's credit that, having set up the SDC to do exactly this, it did respond to at least some of the SDC's entreaties on issues such as transport and energy.

3. As other commentators have pointed out, the SDC's annual budget of £3m is far outstripped by the savings it identifies for Whitehall through sustainability measures. In its most recent annual report on government progress in meeting its SOGE (Sustainable Operations on the Government Estate) targets (between 2006 and 2009), the SDC calculates that government saved £25.5 million in water bills through water efficiency measures between 2006 and 2009, including £13 million in 2008–2009. It also suggests that a £3 million SALIX (spend-to-save) fund for the public sector would yield 20% cuts in water savings and payback within one year, and that a further 10% reduction in water use would yield a further annual £5 million in savings. Many savings would be enjoyed year-on-year and so the earlier they can be achieved, the earlier savings can start to be made. The document also shows that MOD is by far the biggest water user in government—accounting for 67% of consumption—where financial savings from water efficiency could free up large amounts for frontline spending.

Specific functions

4. With the SDC abolished, Waterwise agrees with the Coalition Government that it will be essential to retain at least some of its functions. Some could be fulfilled within government, but measures will need to be put in place to seek to ensure these are effective, and even then the removal of the public, arms'-length tier will lessen the impact. Waterwise believes that some of the Sustainable Development Commission's functions will need to be continued to be carried out independently of government, in a watchdog/advisory role, potentially through the third sector, at best value, and funded through a levy on government departments which would be more than balanced by resulting savings.

5. Below, Waterwise discusses the SDC's four main work areas:

- “Promoting awareness of the concept of sustainable development”.
- “Establishing good working practices within Government”.
- “Advising key Ministers and others across Government”.

6. These three functions are supported by policy knowledge and technical and expert advice, and could in theory be carried out in government. In practice it is likely that even Defra and DECC will revert to their own departmental policy priorities rather than driving cross-government estate management. Furthermore, it is difficult to envisage departments across Whitehall jumping to deliver on a sustainability agenda pushed by Defra and DECC if this doesn't have public scrutiny, and at a time when staff and programme funding is being substantially cut, and work considered non-essential ceasing to reach a department's top priorities, if it still has staff and finance attached to it at all. The loss of the role of public scrutiny in this process, as well as its move away from its sitting above and beyond both departmental and immediate policy priorities, will be very likely to lessen its impact. Even existing high-level commitment from Permanent Secretaries in the form of personal objectives, combined with the auditing role of the SDC, does not currently lead to best-in-field behaviour in terms of sustainability on the government estate. The loss of both of these in the current financial climate is

likely to have the multiple impact of threatening the sustainability of government, its ability to cut its running costs and its ability to set an example and drive markets in procurement and goods.

— “Monitoring performance against sustainable development targets and reporting on these”.

7. These functions are the ones which most clearly (more than) pay for themselves over time, through delivery. If this is one of the drivers for the Coalition Government’s decision to abandon the SDC, as stated, then it is particularly important to maintain this function. The increased value and impact of arms’-length identification of potential measures and savings and then monitoring of their implementation and impact has been proven time and again across the economy—and this broad model is indeed the basis of the structure of the regulatory framework for privatised utilities. *These functions could be delivered at arms’ length from government through the third sector, funded at best value through a levy on government departments which would be more than balanced by resulting savings. An NGO body or bodies could identify potential measures and monitor progress on specific areas such as water efficiency, energy efficiency, transport and waste, and how these all help to deliver carbon targets (as well as adaptation goals, in the case of water efficiency). It will be important for high-level commitment to targets and delivery to be maintained, and the delivery NGO(s) could sit on a committee which held Permanent Secretaries to account for their own delivery. The aim should be procurement, ongoing estate management and staff behaviour which is best-in-class, including through mandatory, regularly updated procurement rules. Procurement should be carried out cross-government rather than devolved to departments, and this could be supported by the above committee, with individual departments reporting on ongoing performance in terms of, for example, water and energy savings and bills. At the very least, government departments should continue to report annually, but this should be supported by real-time reporting online of sustainability attainment on the government estate. Sustainability reporting in terms of financial savings, environmental (including quantified savings) and social benefits should be mandated in departmental accounts.*

AN INCREASED ROLE FOR WATER EFFICIENCY IN GOVERNANCE ARRANGEMENTS FOR SUSTAINABLE DEVELOPMENT

8. Water efficiency—wasting less water—is an essential part of both adapting to and tackling climate change, ensuring less water goes further and cutting carbon emissions from heating, treating and pumping water and wastewater.

9. To date, programmes and policies undertaken by both the Coalition Government and the previous administration to tackle climate change, adapt to it, and develop the low-carbon and green economies are energy-heavy and do not reflect or include the important role of water efficiency.

10. Water efficiency can play an important role in the Coalition Government’s deficit reduction this year and beyond—it can actively reduce running and procurement costs for central government and public sector bodies, on both water and energy, freeing up costs for frontline spending for example in the National Health Service and the Ministry of Defence. Simple measures can cut running costs by up to 20%, and water efficient procurement does not increase capital costs.

11. Water efficiency can also help central government meet its 10% carbon reduction target within 12 months—reducing wasted hot water in showers, taps, dishwashers and washing machines. Most public sector buildings in the UK are metered for water. This means that if they waste less water—through “domestic” processes such as taps, toilets, urinals and showers, and dishwashers and washing machines, as well as in industrial processes such as cleaning and cooling, they will see immediate reductions in their water bills. For example, many workplaces still have urinals which flush constantly, but there are now UK-manufactured products which flush only when a sensor is triggered, or less frequently, or not at all. Wasting less hot water in workplaces would also cut energy bills.

12. The top 40 water-consuming hospitals in England consume about 20 megalitres a day which is equivalent to the water used by about 50,000 homes. Water savings of 15–25% could be achieved through retrofitting water-efficient equipment and working with staff and patients to change behaviour. These savings could supply enough water for 12,500 families in areas such as the South East and East of England which are under pressure from increasing population and climate change.

13. Water efficiency strategies and targets based on actual measures and water (and carbon) savings should be included in departmental adaptation plans, which tend currently to focus on flood risk management. Water efficiency should be included in carbon budgets. Public sector procurement should mandate the most water-efficient products currently available on the market, and be regularly updated.

Written evidence submitted by the UK Environmental Law Foundation

SUMMARY

- Sustainable development objectives are universally supported in principle, but are often not acted on when they conflict with more immediately pressing objectives. It is this conflict that has to be managed.
- The traditional approach is to institutionalise the conflict into different departmental points of view. The alternative, which we recommend, is to make the conflict the business of a central unit.
- This is because the traditional approach:
 - Is at times wasteful and inefficient.
 - Makes it difficult for the government to respond in an agile way when things don't go according to plan.
 - Cannot mobilise society for the major changes that will be needed in the 2020s.
 - Cannot provide the kind of strategic perspective which the scale of the challenge demands.
 - Cannot give enough air time to non-climate change threats to sustainability.
- Hence we recommend:
 - The Cabinet Office Minister of State should have responsibility for ensuring that the prosperity and well-being of citizens today is not bought at the expense of their prosperity and well-being in the future.
 - There should be a dedicated unit serving the Minister of State, to develop a long term strategy, to monitor performance against this, and to co-ordinate and engage with all those whose support will be needed for implementation.
 - The unit should hold a significant budget which it would then allocate to departments—this would be instead of not in addition to existing budgets.
 - The Climate Change Committee (CCC) and the Environmental Audit Committee (EAC) should each report regularly on the adequacy of the evolving strategy, the success with which it is being implemented and on potential improvements.

MAIN SUBMISSION

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

1. Our response covers policy only and is based on a single, simple observation. Sustainable development objectives are universally supported in principle, but are often not acted on when they conflict with more immediately pressing objectives. It is this conflict between the long and the short term that makes the issue difficult and it is this conflict that has to be managed. This requires both effective policy making and effective and independent policy auditing: there are biases in government towards the short term and against action and we need external pressures to counter them.

2. As far as policy *making* is concerned we believe there are two possible approaches to managing the conflict:

- The conflict can be institutionalised into different departmental points of view, and resolved through cabinet committees, cross cutting targets and the associated machinery. This was the approach of the last government.
- The conflict can become the business of a central unit, either permanently or at least for a while, and resolved through a combination of strategic analysis and the widest possible engagement with the private and public sectors and the public at large. This is the approach we recommend.

3. There are good arguments for preserving the previous approach: playing out the conflict in this way helps ensure that different points of view are represented, with the political equivalent of the invisible hand resolving differences. However we also believe it has real shortcomings (the examples are all from before May of this year):

- It is at times wasteful and inefficient, with work being duplicated in different places to support different departmental agendas (for example on occasion this happened on supply chains, low carbon skills and consumption patterns), and poor alignment of policy development and implementation (for example on employment subsidies, fuel poverty, behaviour change and regional policy).
- It makes it difficult for the government to respond in an agile way when things don't go according to plan—institutional bias and associated entrenched positions are designed into the system. One senior official has said that this slowness is actually a merit of the system, preventing politicians from constantly shooting off in new directions, but anyone who has worked in the private sector will know that responding to events slowly is hardly a pre-condition of good strategic decision making.

- It cannot mobilise society for the fundamental changes all parties agree will be needed in the 2020s and beyond, and indeed sends out very mixed signals: business, citizens and indeed the public sector need a very clear sense of where government thinks we are going if they are to play their role.
- It cannot provide the kind of strategic perspective demanded by the scale of the challenges involved; these are simply too large for the negotiation of trade offs, micro-economic analysis and direction (or nudging) from the centre that the current structures are designed to deliver. As a result, no-one is dealing with them (as one senior official in a position to know has put it). A much broader strategic approach is needed, integrating economics (ie how to mobilise the private sector), organisational strategy (ie how to mobilise and co-ordinate government and the wider public sector) and political strategy (ie how to mobilise the public). The Secretary of State for the Environment told the House of Commons on 22 July that “We will put processes in place to join up activity across Government much more effectively.” Governments have been trying to do that unsuccessfully since the middle ages; it is strategy not simply process that makes effective joining up of major policy development possible.
- It does not effectively integrate responses to non-climate change threats to sustainability into long term economic policy—the process is structured as a negotiation (between say DECC and BIS) which means the third player (in practice often DEFRA, representing biodiversity for example) does not get the air time it deserves.

4. Hence we recommend a structure along the following lines:

- The Cabinet Office Minister of State should have responsibility for ensuring that the prosperity and well-being of citizens today is not bought at the expense of their prosperity and well-being in the future; he should also be the Prime Minister’s representative in negotiations between departments on this agenda.
- There should be a dedicated unit serving the Minister of State, to develop a long term strategy, to monitor performance against this, and to co-ordinate and engage with all those whose support will be needed for implementation; the Director of the unit could also be a member of the No 10 Staff.
- The unit should hold a significant budget which it would then allocate to departments—this would be instead of not in addition to existing budgets.
- The Minister of State should chair a quarterly meeting of junior ministers across Whitehall with sustainable development responsibilities, with a view to spotting and nurturing opportunities for co-ordination and co-operation and for generating new ideas.
- The remit of Cabinet sub-committee ED(E) should be expanded to include policies designed to ensure sustainability and the successful transition to a low carbon, sustainable economy (it should also be rebadged).

5. The role of the central unit in more detail would be:

- To identify risks and ways of mitigating these.
- To caretake and communicate an evolving framework for the policies designed to deliver the transformation to a low carbon, sustainable economy.
- To monitor performance against the metrics in this framework, building on existing systems such as carbon budgets.
- To co-ordinate and ideally reduce the number of Whitehall initiatives that fit within this framework, and where there are policy conflicts, create areas of agreement that can be acted on, when necessary negotiating changes.
- To build capability by providing analytical tools for policy makers (e.g. inputs to the Green Book), advice, training and commissioned research.
- To stimulate and respond to the networks beyond Whitehall that encourage creative, joined up policy.
- To engage with the public, business and the public and third sectors.

6. This would make much of the role of the Sustainable Development Programme Office in DEFRA redundant.

7. We believe this unit, if it stuck to this brief, would win the necessary Whitehall support. The Institute for Government reported recently in “Shaping Up” (2010) that while senior officials would strongly resist “micro-management”, they would generally welcome “stronger leadership” from the centre. We also believe that a small but strategic centre is *more* compatible with devolution of powers to local government than is traditional departmentalism.

8. As to the policy *audit* process, we recommend that the Climate Change Committee (CCC) and the Environmental Audit Committee (EAC) each report regularly on the adequacy of the evolving strategy, the success with which it is being implemented and on potential improvements. The CCC would, of course, be concerned purely with climate change; the EAC, ideally reporting after the CCC and incorporating its findings,

would take a broader view of sustainability. We recommend that the EAC is supported by the National Audit Office in this work.

How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

9. Our response covers policy only. The existing sustainability reporting as it applies to policy making is largely post hoc justification and as such a complete waste of time and money. The various official structures that have from time to time sprung up (such as the Sustainable Development Programme Board) have been equally pointless.

10. The governance and reporting have to be conducted by a unit with the confidence of the Prime Minister. What it says will then count—but, conscious of the need to retain that confidence, it will also remain sensitive to the conflicting pressures that departments face. Hence our recommendation above that the unit reporting to the Cabinet Office Minister of State is also responsible for monitoring policy across government: it would develop the strategy, monitor progress across government against that strategy, and then report on that progress to the Cabinet, as well as the EAC and the CCC. The latter, as noted, would then supply an independent audit.

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

11. Promoting awareness of the concept of sustainable development

The SDC established greater awareness of the concept amongst a number of officials, largely but not exclusively those dealing with operations and procurement. It also had some successes in its work with DCFS on the curriculum. However it was not successful at promoting the concept to the wider world. The concept—basically not depriving our children and their children of a decent life—is very simple and intuitively appealing. The SDC, and DEFRA under the last government, made it rather complex and difficult to understand. Promoting wider awareness of the need for sustainable development—and of how this means more than dealing with climate change—remains of vital importance.

12. Establishing good working practices within Government

The SDC made a significant contribution to establishing good operations and procurement working practices within Government (it did not influence policy working practices). This was largely through its successful SOGE and SDIG reports and associated capability building processes. Much of this work is done and the baton can easily be passed on to the Centre of Expertise in Sustainable Procurement.

13. Advising key Ministers and others across Government

The SDC partly fulfilled its remit in this respect: it was successful in DH and in DCSF/ DfE but less successful in other departments. This was probably because it failed to win the trust of key Ministers, and was unable (and to some extent unwilling) to use its inside track to identify how it could help Ministers solve the problems they faced.

14. Monitoring performance against sustainable development targets and reporting on these.

As just noted, the SDC fulfilled its remit in this respect effectively, in so far as the targets related to central government operations and procurement.

In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (eg to develop “sustainability reporting” in departments’ accounts) and the contributions that other bodies might make (eg Centre of Expertise in Sustainable Procurement)?

15. We do not have any additional comments to make under this heading.

How, without the assistance of the SDC, will the Government be able to demonstrate that it is “the greenest government ever”?

16. The extension of the Cabinet Office Minister of State’s remit as proposed above, together with the formation of a supporting unit and the development of ED(EF)’s remit, would begin to demonstrate the Government’s commitment. The kind of public engagement that we are calling on the new unit to perform would continue to demonstrate this.

11 October 2010

Written evidence submitted by Public and Commercial Services Union

1. The Public and Commercial Services union (PCS) is the largest civil service trade union, with a total membership of over 300,000 working in over 200 civil service departments, non-departmental public bodies and related areas.

2. PCS welcomes this timely inquiry. We are happy to supplement this submission with any further written evidence and would also welcome the opportunity to provide oral evidence to the committee.

3. For the purpose of clarity we have dealt with each question posed in the inquiry under separate subheadings below.

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

4. PCS was delighted to see the recommendation in the EAC's 2008 report *Making Government operations more sustainable* which, citing evidence that PCS had submitted, commented on the lack of union involvement on sustainable development issues and recommended (paragraph 69) that:

“...OGC works with civil service unions to ensure that staff are trained, motivated, and empowered to take a leading role in mainstreaming sustainability in Government operations.”

5. Following this recommendation a sustainability forum was set up early in 2009 under the auspices of the Council of Civil Service Unions (CCSU)/Cabinet Office/OGC “Work and well-being” negotiations. The forum has made good progress, meeting on a quarterly basis, and focussing on principles for CCSU engagement in the delivery of sustainable government.

6. Some of the initiatives and achievements to date include:

- CCSU participation in a “Raising our Game” conference for practitioners across the wider public sector (September 2009).
- Publication of a union case study in an OGC Delivery Plan Update (2009).
- Ongoing work looking at setting up joint sustainability forums at departmental level.
- Ongoing work to agree a process for joint workplace environmental audits.
- Discussions around the role of OGC in monitoring and encouraging departments/ agencies/ NDPBs’ involvement in the Cycle to Work Scheme.
- Joint work around sustainable procurement.

7. Since the general election, however, PCs are concerned that there has been a lack of clarity about what the new coalition government’s broader framework and priorities are regarding sustainable government. Indeed, despite the government’s rhetoric about being the “greenest government ever” it is still unclear as to which department is leading on this work.

8. We are particularly concerned about how the Prime Minister’s commitment on gaining office, to a reduction of 10% in carbon emissions within 12 months across the government estate, is being implemented. We are aware that guidance has been issued by DECC on meeting this commitment² and are concerned that there appears to have been no formal consultation with the unions —particularly as some of the issues, such as setting inflexible workplace temperature maxima/minima, clearly have implications for health & safety, work practices, and other conditions of employment. We are also concerned that some of the suggested measures appear rather short-term, piecemeal and in some instances patronising to staff—contrary to the strategic approach that the CCSU/Cabinet Office/OGC sustainability forum has been taking.

9. Furthermore, the “Greener Government” briefings suggest that the government plans to use its own employees to test wider behavioural change initiatives; we regard this as highly questionable, particularly given the lack of consultation.

How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

10. The government’s spending plans, due to be set out in the Comprehensive Spending Review, are likely to mean substantial cuts in costs as well as emissions. This also means that unions have an important role to play in a joint approach on staff engagement. PCS believes that if each department set up joint employer/union sustainability forums as we have suggested during talks with OGC/Cabinet Office this would not only secure greater staff awareness and engagement but would improve governance arrangements and also increase ownership and accountability.

11. Joint employer/union sustainability forums could publish annual progress reports with recommendations for future activity.

² Greener Government: *Pan-government staff engagement plan and Emissions-saving Behaviour Change* —Briefing for permanent secretaries.

12. In this context we would reiterate the comments we made when we submitted evidence to the EAC's 2008 enquiry on sustainable government: if union green representatives are to be effective in performing the role of helping departments in the crucial task of securing behavioural change and reducing emissions they need formal rights to time off for trade union duties and activities under the Acas Code of Practice *Time off for Trade Union Duties and Activities*.

13. The TUC's successive *GreenWorkplace* projects have shown clearly the potential for change when employers and unions work together on these issues³ as has the local strategic partnership at Bristol City Council, for example.⁴

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

14. The SDC's successive *Sustainable Development in Government* reports have, in our view, been invaluable in monitoring and scrutinising the progress of government in making its own estate more sustainable, in making government accountable and encouraging government to raise its game.

15. The SDC's most recent report, *Becoming the "Greenest Government Ever"*, published in July this year (on the same day that the government announced that the SDC was to be abolished), makes clear that while much had been achieved by the previous administration there is still much work to do. For example, on the key issue of reducing carbon emissions, the report shows that government is still not yet on track to achieve the sustainable operations on the government estates (SOGE) target of a 12.5% reduction in carbon emissions by 2010–2011 (and 30% by 2020). There is also a need, as identified by the SDC, for some of the targets—such as on biodiversity—to be more ambitious.

16. PCS believes that the SDC has been very successful in fulfilling its remit as the UK Government's sustainable development watchdog and advisor. The commission's "*Greenest Government Ever*" report—which reported that £60–70 million was saved in one year through sustainable measures across government—demonstrates that the commission, which received £3 million in funding, was very good value for money.

17. We would disagree with the Defra Secretary of State, Caroline Spelman MP, who in announcing that the SDC was to be scrapped said that the sustainable agenda was part of what the government does "as a matter of course" and is now "everyday government business". The SDC's *Sustainable Development in Government* reports have demonstrated that this is not the case and that government has had to be cajoled into improving its performance. We would argue that it is vitally important that the scrutiny and accountability that the SDC provided continues and is adequately resourced.

In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (e.g. to develop "sustainability reporting" in departments' accounts) and the contributions that other bodies might make (eg Centre of Expertise in Sustainable Procurement)

18. As indicated in our comments under the first subheading above, PCS believes the government will only be successful in improving the sustainability of its own estate if it continues to do so in consultation with trade unions. Proposals we have made in OGC/Cabinet Office sustainability talks—such as on joint workplace environmental audits—could go a long way in helping to achieve both the short term 10% emissions reduction target as well as longer term SOGE targets.

19. In addition we suggest that there are many lessons to be learnt from sharing good practice across government as suggested in the SDC's *Becoming the "Greenest Government Ever"* report. At present there is little evidence of joined up thinking. The TUC's *GreenWorkplaces* projects could provide a useful starting point.

How, without the assistance of the SDC, will the Government be able to demonstrate that it is "the greenest government ever"?

20. PCS believes that withdrawing funding from the SDC was a short-sighted decision that makes a nonsense of the claim to be the "greenest government ever". It signals that in the rush to put in place austerity measures "being green" is a luxury that can no longer be afforded. As the SDC's Chair Will Day commented in response to the government's decision to scrap the SDC, the opposite is in fact the case. Measures to make government greener are also about avoiding waste and saving money. Our members know this and want to make a positive contribution to making government operations greener—but not by worsening their terms and condition, passing on the cost to them or cutting their jobs.

13 October 2010

³ See for example *GreenWorks*, TUC, March 2010 (downloadable at <http://www.tuc.org.uk/extras/greenworkplacesreport.pdf>).

⁴ See IDS, HR Studies, May 2010 pp16–18.

Written evidence submitted by the Town and Country Planning Association

1.0 ABOUT THE TCPA

1.1 The Town and Country Planning Association (TCPA) is an independent charity working to improve town and country planning. Its membership includes organisations and individuals drawn from planning practitioners in government, private practice and universities. It puts social justice and the environment at the heart of policy debate and champions fresh perspectives on major issues, of planning policy, housing, regeneration and climate change. Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country.
- Empower people and communities to influence decisions that affect them.
- Improve the planning system in accordance with the principles of sustainable development.

2.0 SUMMARY OF TCPA EVIDENCE

2.1 The TCPA welcomes the Environmental Audit Committee's inquiry into "*embedding sustainable development across government*", in particular examining the potential impact of the abolition of the Sustainable Development Commission (though TCPA notes that the London Sustainable Development Commission will continue to exist).

2.2 The Environmental Audit Committee has, in recent reports, highlighted the need for a greater leadership role from national government on the delivery of sustainable development. These reports include the findings from inquiries into Government Departments' progress against sustainable development objectives, such as on climate change⁵ and adaptation⁶, as well as the work of the Royal Commission on Environmental Pollution⁷.

2.3 In addition to abolishing the Sustainable Development Commission and the Royal Commission on Environmental Pollution, the Government is in the process of "streamlining" national planning guidance, including the supplement to Planning Policy Statement 1: Planning and Climate Change. The Government is also abolishing the Audit Commission, and removing the local government performance management framework including key national indicators on carbon dioxide emissions and climate change adaptation which were useful mechanisms to enable compilation of a national picture of progress towards meeting sustainable development objectives.

2.4 The TCPA has been actively engaged in examining the proposals set out in the Conservative Party Policy Paper, "*Open Source Planning*"⁸ which laid the foundations for the Government's planning reform package. Drawing on feedback from over 100 participants in five cross-sector roundtable debates held this autumn, the TCPA's latest publication "*The Future of Planning Report*"⁹ presents a series of solution-focused recommendations. The report can be downloaded from www.tcpa.org.uk/pages/the-future-of-planning.html

2.5 In the context of the above background information, the TCPA's brief submission highlights three issues for the Committee's attention:

2.6 Firstly, **sustainable development remains the key guiding principle for human development**. Its reputation is blunted not because it is conceptually wrong but because applying principles such as intergenerational equity is difficult and run counter to dominant economic models. Sustainable development remains crucial for the future of spatial planning where we can show that built development can genuinely integrate the economic, social and environmental needs of society and the planet.

2.7 Secondly, **for sustainable development to be effective there needs much greater cross departmental commitment to its principles**. The 2005 UK Sustainable Development Strategy is a sound basis for action but this strategy requires an urgent update to factor in increasing global change, particularly in relation to poverty and climate change. Existing legal duties, such as the one expressed in the 2004 Planning and Compulsory Purchase Act and 2008 Planning Act, are weak and need to be addressed. The skills and resources of decision makers on issues such as planning also require vigorous improvement if sustainable development is to be achieved. Independent organisations such as the SDC, RCEP and Audit Commission will need to be retained to hold the Government to account to ensure Government coherently delivers sustainable development actions across its departments and functions.

2.8 Thirdly, **the Governments current planning reform agenda will set back delivery on sustainable development**. The abolition of regional planning structures was not assessed against its impacts on sustainable development in general or on specific issues such as climate change or equality. Little consideration has yet been given as to whether the "localism" of planning will lead to sustainable development.

⁵ Climate change and local, regional and devolved Government, Eight Report of Session 2007–08 (July 2008).

⁶ Climate change and local, regional and devolved Government, Sixth Report of Session 2009–10 (March 2010).

⁷ Adapting Institutions to Climate Change, March 2010.

⁸ "*Open Source Planning*" (February 2010), Conservative Policy Green Paper No. 14.

⁹ TCPA (2010) *The Future of Planning Report—distilling the roundtable debates*. TCPA, London.

2.9 There are opportunities through the Localism Bill to strengthen duties to promote sustainable development and to ensure that key bodies such as Local Enterprise Partnerships (LEP) have a duty to support sustainable development. The abolition of the Sustainable Development Commission and of bodies such as the Royal Commission on Environmental Pollution is likely to have a negative impact on the progress of sustainable development. The Sustainable Development Commission provided the key expertise by which progress on sustainable development could be evaluated. It also offered expert advice on both delivery and development of sustainable development. The abolition of Royal Commission on Environmental Pollution removes a vital source of expert information on key environmental issues related to sustainable development. The TCPA questions whether Select Committees can replace such bodies, given that they have neither the resources or time to undertake investigations of the breadth and detail of the RCEP.

13 October 2010

Written evidence submitted by the Woodland Trust

The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have three aims: to enable the creation of more native woods and places rich in trees; to protect native woods, trees and their wildlife for the future; to inspire everyone to enjoy and value woods and trees. We own over 1,000 sites and have 300,000 members and supporters.

1. OVERVIEW

Government should lead by example in the way it conducts its business. Sustainable development must take into account the impact of policies and the working of government on natural habitats: their biodiversity, and the wider ecosystem services they provide. As the champion of trees and woods, and especially native trees and woods, the Woodland Trust believes they have a vital role to play in ensuring the UK's landscapes are rich in wildlife and provide for our population in terms of fuel, food and fibre, as well as providing places for recreation. In particular, the Trust would like to see:

- Doubling of native tree cover.
- No further loss of ancient woodland.
- All Planted Ancient Woodland Sites in restoration programmes.

In order to ensure sustainable development, we believe there is a need to ensure no net loss of tree cover across the UK, but rather a significant increase—woodland cover is currently one of the lowest in Europe—and that woods in the UK are managed sustainably.

2. *How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?*

2.1 The UK Government should lead by example on procurement of timber and other wood-based products. The Woodland Trust supports the existing timber procurement policy, which requires central government departments, their executive agencies and non-departmental public bodies only to procure timber and wood-derived products originating from either legal and sustainable or FLEGT licensed or equivalent sources. We also support the move to require local authorities to comply with these requirements.

2.2 It is essential that this policy continues to be implemented, with sufficient monitoring through CPET (the Central Point of Expertise for Timber Procurement). The Woodland Trust strongly supports certification of timber and other products as evidence for their sustainable production, through either FSC (Forest Stewardship Council) or PEFC (Programme for the Endorsement of Forest Certification).

2.3 Government departments with a land management remit should demonstrate sustainable management of woodland, which means in accordance with credible certification standards. The Woodland Trust sees restoration of Planted Ancient Woodland Sites (PAWS)—ancient woods replanted with non-native conifers—as a particular priority. Ancient woods are the UK's richest terrestrial habitat, covering only 2% of its land area. Replanting with conifers has had a detrimental effect on their biodiversity but as the conifers reach economic maturity there is an opportunity to reverse this, restoring the woods to mainly native broadleaved cover. Certification through FSC or UKWAS (UK Woodland Assurance Standard) requires landowners to maintain the biodiversity value of PAWS and bring a percentage into restoration. The Woodland Trust would like to see all PAWS owned by government departments brought into programmes of restoration.

2.4 Current systems of measuring and embedding sustainable development need to be reviewed. For example, it is questionable whether PSAs have succeeded in delivering a healthy natural environment. For example, in the UK we have failed to meet 2010 Biodiversity Action Plan targets. Indicators of sustainable development—eg bird populations—are sometimes treated as an end in themselves in the delivery measures chosen, rather than as indicators of a more general aim eg biodiversity as a whole.

2.5 In order to maximize the opportunities for sustainable development, there should be a more integrated approach to land management generally—for example, between agricultural and forestry policy.

2.6 A measure of the success of sustainable development should be an increase in tree cover, including a specific target on native tree cover. The UK is one of the least wooded countries in Europe, yet trees and woods provide a whole range of important ecosystem services. They can help us to mitigate and adapt to climate change. They store carbon, ameliorate flooding, improve air and water quality, provide shade and shelter, reduce temperatures in urban areas, and are host to a wide range of biodiversity. Encouragingly, there is a growing recognition of the value of woods and trees across government and at Parliament as evidenced by the Low Carbon Transition Plan,¹⁰ the commitment to a national tree planting campaign and a supportive debate in Westminster Hall before the election.¹¹ There is a need to ensure the right incentives are available to encourage tree planting. Recently, increased levels of grant in Wales and Northern Ireland have been shown to encourage an increase in tree planting. A 30 per cent increase in grant aid in Northern Ireland resulted in a threefold increase in applications for woodland creation grants in December 2009 and January 2010 compared with the same period the previous year.

3. *How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?*

3.1 A healthy natural environment is fundamental to human existence—it is not a luxury. In order to ensure this outcome, we need political leadership at the highest level, acting upon overwhelming evidence and providing moral leadership which will show that the aspiration to be “the greenest government ever” is truly being acted upon. We believe that each Government department should be required to produce an ecosystems strategy and be held accountable for it. Similarly, whilst we recognise that there is a need to reduce the number of overall targets set across Government this does not mean that there should be a departure from the use of intelligent targets which aid efficient use of resources—indeed there has never been a more important time than the present financial climate to foster good stewardship. We therefore feel that intelligent cross-government indicators are also required—reviewed by a powerful Cabinet committee.

3.2 Better systems of monitoring and evaluation are needed. As an example, ancient woodland is the UK’s equivalent to the rainforest, is irreplaceable and is home to more threatened species than any other terrestrial habitat. In recognition of the vital role this habitat has in ensuring that wildlife decline is halted, the UK Biodiversity Action Plan (BAP) committed to maintain the current extent and distribution of ancient semi-natural woodland. However, since the target was agreed the Forestry Commission have been unable to impose a system that is capable of monitoring loss.

3.3 Another important action identified by the BAP was the restoration of those ancient woodlands degraded by the planting of non-native conifers. To achieve this objective the BAP committed to restore 26,800ha of non-native Plantations on Ancient Woodland Sites (PAWS). The Forestry Commission has made progress on its own estate; however, monitoring restoration in the private sector has proved less successful as the Forestry Commission has been unable to collate information from grants and felling licences.

4. *Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?*

4.1 The Sustainable Development Commission has helped raise awareness of the need for sustainability at a time when this received less mainstream attention. Moving forward, sustainable development should be at the heart of policy and decision making in all government departments, public sector institutions, and businesses.

5. *In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (eg to develop “sustainability reporting” in departments’ accounts) and the contributions that other bodies might make (eg Centre of Expertise in Sustainable Procurement)?*

5.1 Government should look to the findings of the TEEB (The Economics of Ecosystems and Biodiversity) study¹² and the role that business can play in creating a healthy and wildlife-rich natural environment. The benefits to business of engaging with biodiversity and the natural environment are manifold, including reduced costs, improved brand image, and reaching new customers. Government should put in place policies and mechanisms to encourage businesses to invest in the environment. The Green Investment Bank (GIB) is one opportunity: the Trust believes there is a compelling business, environmental and social rationale for ensuring that the GIB funds woodland creation and tree planting as a contribution to mitigation of, and adaptation to, climate change.

6. *How, without the assistance of the SDC, will the Government be able to demonstrate that it is “the greenest government ever”?*

6.1 The national tree planting campaign will be a tangible demonstration of the Government’s commitment to the environment, as would adoption of the Liberal Democrats’ commitment to double woodland cover as a Coalition government target.

¹⁰ Department for Energy and Climate Change, *The UK low carbon transition plan: national strategy for climate and energy* (2009).

¹¹ Hansard debate, *Native woodland* (9 Feb 2010), at: <http://www.publications.parliament.uk/pa/cm200910/cmhansrd/cm100209/halltext/100209h0010.htm#10020969000005>

¹² <http://www.teebweb.org/>

6.2 The Government should also re-affirm a commitment to protection of ancient woodland, which is currently enshrined in planning policy guidance, and to restoration of ancient woods planted with non-native conifers, both of which are targets under the UK Biodiversity Action Plan.

13 October 2010

Written Evidence submitted by Localise West Midlands

1.0 LWM is a thinktank, campaign group and consultancy promoting a localised approach to economic development and decision-making for sustainability and justice reasons. We only heard about this enquiry yesterday, so apologies that our submission is more poorly referenced and less detailed than would otherwise be the case.

2.0 SUMMARY:

Localise West Midlands concludes that the following are the most important aspects of embedding sustainable development across Government:

- Learn from and implement as much of possible of the work that has been done by the sustainable development commission over the last few years, in particular learning from the Prosperity Without Growth work.
- Examine and resolve policy conflicts across the whole of Government business with sustainability objectives in mind.
- High level sustainability education of senior civil servants and ministers.
- Relatedly ensure that procurement is truly efficient in terms of long term costs and global resources.
- Ensure the Green Investment Bank is set up with non-profit governance and a sensitivity to small projects.
- Use its influence within Europe to change competition law permit a greater freedom for national and local government procurement to buy social benefits even if this might entail more local sourcing.
- Find a way to replace the “watchdog” role that the SDC formerly occupied.
- Address the crisis in agriculture urgently.

3.0 DETAILED SUBMISSION

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

3.1 From our perspective the work of the SDC led to a greater embedding of much genuine sustainability thinking into the previous Government and it is hoped that some of this survives in Whitehall. Clearly the current government see the SDC as a “task and finish” organisation which has been working on embedding sustainability into the Government’s normal working practice and while we would agree with this, we would not conclude that the task is finished. In particular:

- (a) the work on *Prosperity without Growth* was met by much Government reluctance, and it is this sort of challenge that should have been given time to be explored and conclusions drawn before the SDC was abolished;
- (b) an independent watchdog role for sustainability is still very much needed.
- (c) It is not the duty of any other Government department or quango to identify and make recommendations for resolving policy conflicts within central government. Policy conflicts are rife, particularly on procurement and the short-term efficiency agenda but generally across all departments and subjects such as transport, agriculture, food, health.

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

3.2 Attention to policy conflicts as above.

3.3 High level sustainability awareness training for senior civil servants and ministers, including a rethink on economic scale (“strategic” does not necessarily mean “big” and small-scale enterprise, procurement etc must match the community empowerment of the Big Society concept) and on definitions of efficiency (ie it means long term resource efficiency, not short term cost savings).

3.4 Find ways to measure “net” growth rather than “gross” when identifying high-growth businesses, for example is a high-growth business simply displacing a number of smaller-scale enterprises (for example, UK supermarket chains displacing smaller chains and independents) in which case the net benefits may be small or negative.

How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

- 3.5 Identify an organisation to undertake the independent watchdog role.
- 3.6 Extend the “Payment by results” concept to Ministers for their action on climate change.
- 3.7 Attention to cross-departmental achievements.

In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (e.g. to develop “sustainability reporting” in departments’ accounts) and the contributions that other bodies might make (eg Centre of Expertise in Sustainable Procurement)?

3.8 The recent review of procurement efficiency by Sir Philip Green, while containing some useful case studies, is alarming in its lack of reference to sustainability criteria and its recommendations for greater centralisation. This must be weighed against the wealth of objective study on procurement for wider benefit that has been done over the last few years.

How, without the assistance of the SDC, will the Government be able to demonstrate that it is “the greenest government ever”?

- 3.9 Use its influence within Europe to change competition law permit a greater freedom for national and local government procurement to buy environmental and social benefits even if this might entail more local sourcing.
- 3.10 Create a Green Investment Bank that is fully able to deal with local-scale initiatives as well as large, and is governed on non-profit principles. The Wrigley report and the more recent report on the GIB by the Aldersgate Group does not sufficiently address the need for smaller-scale initiatives.
- 3.11 Address the crisis in agriculture and the food supply chain, in which farming is becoming less diverse and more intensive with farmers leaving the industry in increasing numbers, with implications for rural livelihoods, sustainability etc. Food is the single most urgent area to demonstrate sustainability commitments and one that should chime well with coalition priorities.

13 October 2010

Written evidence submitted by Dr Rupert Read, University of East Anglia

GUARDIANS OF THE BASIC NEEDS OF FUTURE GENERATIONS

Summary:

This submission:

- Proposes the creation of a set of “Guardians of the basic needs of future generations”, with strong legal powers to prevent and undo government action that can be shown (respectively) to undermine the basic needs of future people or to act against the dictates of a precautionary approach to the needs of future people.
- Sets out in outline form possible constitutional and institutional mechanisms for the Guardians.
- Outlines how the Guardians would be a superior option to the SDC, to various proposed weak successors to the SDC, and to a do-nothing option.
- Explains how this proposal, if enacted, would without doubt make this “the greenest government ever”, and a world leader in sustainable development.

Main text:

I am Reader in Philosophy at the University of East Anglia (Norwich). I work with colleagues in Environmental Science at UEA, and my current research is for a book entitled “*A new covenant with all beings*”. The climax of this book-in-progress is presentation of my proposal for a new institutional mechanism that should secure the welfare of future generations. This mechanism is “Guardians of the basic needs of future generations”.

The idea of guardians for future generations has a long philosophical pedigree, going back to some extent as far as Plato. The idea in its modern form has been fairly widely investigated in the last 50 years, notably by legal philosopher Christopher Stone in his influential book, “*Should trees have standing?*”? My innovation is (1) to tailor this idea to the contemporary British context, and (2) to radicalise the idea such that these Guardians have real powers to achieve the ends for which they are created.

The Sustainable Development Commission has been abolished; radical reform of the House of Lords is being planned. Now is the perfect time to think boldly about what the shape of governance should be, in the 21st century. Now is a time for thinking, moreover, about governance *for the future*: For Britain, Europe, and the world, are under ecological threat as never before, and the need to plan for the needs of future generations are therefore greater than they have ever been.

I propose to “think the unthinkable” and the needful at this time, to respond to this context. My starting-point is democracy. The people ought to rule. But this oughtn’t to mean: only people who are able to vote. The young ought to have a voice, too; and, more crucially, *people who as yet do not even exist*. (See my work on future people [e.g. “On future people”, forthcoming in *THINK*; and my *Open Democracy* piece, here: <http://www.opendemocracy.net/rupert-read/last-refuge-of-prejudice>]. The challenge, if we are to have a meaningful democracy at a time when we need to be more aware than ever of the needs of future people, is to provide as authentic a possible representation of their voice. What would they say, if they could; what do we hear, if we listen closely enough to them? What is our responsibility to our children, and how we can ensure that it is built into our democracy?

The framework of “deliberative democracy” has much to offer, in this connection. [See the oeuvre of James Fishkin et al] The need is to find a way of helping people alive now to enter into the “mind-set” of future people, to determine based on science and ethics what their needs would/will be. This requires real reflection and deliberation, well-informed by the best of evidence.

In order for the needs of future people to be met, and for us as a people to rise to a sufficient standard of care for them (to enable them to be sustained, and moreover to flourish), it will in my view be insufficient to establish oaths, or some general duty, or an ombudsman function, or just another quango, such as an “Office for Future Generations”. All these might well be of some use; but, for future people to be taken care of, for there to be some reasonable chance that we will do *enough* for them, more is needed.

I propose therefore that there be created *guardians with veto powers against any new law that threatens the basic needs of future people* (Such guardians should have various other powers *too*, such as to initiate legislation, and to act as ombudsmen: see below.). In terms of *existing* law, my view would be that *the Guardians could function as advocates/ombudsmen etc. on anything to do with the basic needs/interests of future people*; if then for instance a judicial review of an existing law or of a government administrative decision were being sought, the Guardians opinion would presumably be strongly taken into consideration. Furthermore, I would argue that, if appealed to, the Guardians *should be able to strike down existing laws, but only where they can show that the precautionary principle would oppose the proposed action/law in question*. The precautionary principle, if properly applied, would stand against many things, including profligate use of “natural resources”; but this is a more stringent requirement than in the case of new laws, where there would “only” be the need for Guardians to show that the proposed law would undermine the basic needs of future people.

The guardians will in effect constrain decisions made elsewhere in the governmental and political system, and help to guarantee that those decisions are being made thoughtfully enough with regard to the needs of future people.

The guardians could simply be coincident with a reformed upper House, an upper House given a special responsibility to exercise general care for future people (incorporated into an oath taken by the members of the House). For reasons already intimated above, this would in my view be very unlikely to achieve the requisite result.

Alternatively, the guardians could be a sub-set of the members of the reformed upper House, given a special responsibility to exercise general care for future people, and thus democratically to side-constrain the rest of the democratic infrastructure. This idea is more promising. The guardians would then be very roughly analogous to the Law Lords / Supreme Court, able to strike down new legislation if it did not meet the basic needs of future people, or stood in the way of those needs, and able on appeal to strike down existing legislation if it did not satisfy the demands of the precautionary principle.

The creation of the guardians would be particularly likely to be an effective instrument if the guardians were selected via deliberative-democratic procedures, such as by lot, and supported by a “civil service” of facilitators and experts, including of course legal experts (The Guardians would have strong rights—potentially up to and including subpoena-style-rights, to call any further experts that they wished to hear from, to help them in their deliberations). The guardians would be a vital part of our democratic structures, a special part of the upper House—whether or not the remainder of the upper House were selected by patronage, by election via proportional representation, or by a more generalised deliberative democratic procedure (as in for instance Keith Sutherland’s “*A people’s parliament*”).

(There is a case for selecting the guardians randomly from the entirety of the population, as with jury service, but perhaps with a younger starting-age. Children, perhaps children aged thirteen or over, have a lot to tell us about the future, and a strong empathetic bond with future people. Again, this is a bold proposal: but this is I believe a time and an occasion for boldness.)

Alternatively, the guardians could be a whole different body, super-ordinate to a reformed upper House, somewhat similar to the United States Supreme Court in their constitutional status (though with greater democratic legitimacy, because of their kinship to juries in terms of their selection-method). This too could work.

My view is that the boldest and most useful way to replace the SDC, to be a part of a House-of-Lords-reform-package, and to provide a guarantee for future people that is currently entirely absent, is to instigate a

new institution, a new level of governance, so that Britain can lead the world in taking care of the future: via Guardians for the basic needs of future generations.

To answer then most of the questions you are asking in this inquiry:

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

Answer: The investigation or institution of an office of “Guardians for the basic needs of future generations” would be the most powerful possible way in which to ensure such sustainability. For the very existence of the Guardians would mean that account would be taken of what they would say, at every level of major decision-making. (Furthermore, the Guardians’ explicit opinion would presumably be sought on major budgetary proposals, on Green Papers, etc.)

How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

Answer: The Guardians’ existence would not fully address this desideratum. But it would contribute to it, in that the Guardians would (somewhat like the SDC used to) comment when requested to (and of their own volition) on numerous such matters.

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

Answer: What is in my view most important is that sustainability becomes a *requirement*, and not simply a desirable thing. The SDC made a positive contribution in many fields, but it was not taken seriously as a part of government. It did not have to be listened to. The Guardians would *have* to be listened to.

How, without the assistance of the SDC, will the Government be able to demonstrate that it is “the greenest government ever”?

Answer: If the Government were to announce that it were investigating setting up Guardians for the basic needs of future generations, this would send out the most powerful possible signal that it is serious about being the greenest ever. For this would be a major institutional change, with potentially dramatic consequences, and would at times make some of the Government’s own policies (e.g. support for road-building projects) more difficult to achieve. Thus the Government would be making clear that it is not half-hearted but really means that it will put a green thread centrally in everything that it will do. For, if it did not, the Guardians, would strike the relevant legislation down.

Dr. Rupert Read, Reader in Philosophy, University of East Anglia, Norwich.

13 October 2010

Written evidence submitted by the Food Ethics Council

EXECUTIVE SUMMARY

1. An essential part of the role of the SDC has been to promote the social dimension of sustainable development. The Food Ethics Council’s recent Food and Fairness Inquiry confirmed the continuing importance of this role, exemplified in the Inquiry’s two fundamental conclusions:

- Social injustice is widespread throughout the UK (and global) food system; and
- A fairer food system is a prerequisite for meeting the wider sustainability and public health challenges that confront us today.

2. Defra must, at the earliest opportunity, provide a detailed account of how it intends to provide the leadership on sustainable development that it has assumed from the SDC, including how it will ensure that issues of social justice are properly integrated within the overall framework for sustainable development.

INTRODUCTION—THE FOOD ETHICS COUNCIL

3. The Food Ethics Council (FEC) is a charity that provides independent advice on the ethics of food and farming. Our aim is to create a food system that is fair and healthy for people and the environment. In pursuit of this aim, we:

- Research and analyse ethical issues.
- Mediate between stakeholders.
- Develop tools for ethical decision-making.
- Act as honest brokers in policy and public debate.

4. The 14 members of the FEC are all leaders in their relevant fields, and appointed as individuals. They bring a broad range of expertise to our work, from academic research through to practical knowledge of farming, business and policy.

SUSTAINABLE DEVELOPMENT AND SOCIAL JUSTICE

5. The EAC's specification of the themes for this inquiry includes the question as to which aspects of the work of the Sustainable Development Commission (SDC) remain of particular continuing importance. Our submission is mainly concerned with this question, and draws primarily on our recent Food and Fairness Inquiry, which examined issues of social justice in food and farming.

6. The SDC Framework Document defines the primary aim of the SDC as being:

“to contribute to the policy goal of facilitating and accelerating progress on sustainable development, acting as an adviser, advocate and in a “watchdog” or scrutiny role to government on ways to achieve environmental, social and economic progress in an integrated way and with a view to improve quality of life for future generations.” (pp. 4–5)

7. From the FEC's perspective, two aspects of this role are especially significant, in terms of the adverse implications of the withdrawal of Defra funding: the recognition of the social dimension of sustainable development; and the emphasis on the need for an integrated approach. Social justice is central to the UK framework for sustainable development that has been in place since 2005, set out in Defra's “Securing the future: delivering the UK sustainable development strategy” report of that year. Specifically, the framework acknowledges that “ensuring a just society” and “creating equal opportunity for all” are intrinsic to the concept of sustainable development. However, the FEC has become increasingly concerned that issues of social justice are generally peripheral to debates about sustainable food—and sustainable development generally—which tend to focus instead on the environmental and economic dimensions. It was this concern that prompted us to commission our Food and Fairness Inquiry.

8. The Food and Fairness Inquiry reached two fundamental conclusions, both of which have important implications for the Government's sustainable development strategy. The first was that social injustice is widespread throughout the UK (and global) food system. In the UK context, this includes substantial numbers of households experiencing food poverty, unequal access to healthy diets, adverse employment conditions in the agricultural sector, and the limited scope for citizens to influence food policy. If the UK's approach to sustainable development is to take the social dimension seriously, then it needs to address these facets of social injustice.

9. The other main finding of our inquiry was that a fairer food system is in fact a prerequisite for meeting the wider sustainability and public health challenges that confront us today. For example, if we want people to eat healthier, less ecologically-costly, diets, then we have to ensure that benefit and minimum wage levels provide sufficient income to enable them to do so. The same analysis applies at the global level also, where, for example, poor rural farmers may have no option but to degrade natural resources, because they are denied access to funds necessary for investment in more sustainable farming.

10. It is perhaps worth stressing that these conclusions were reached as a consensus among all the members of our Inquiry Committee—which included leading food industry figures such as the Chief Executive of the Food and Drink Federation, and the Food Policy Director of the British Retail Consortium, as well as academics and NGOs working on food-related issues.

11. This brief overview of the main findings of the Food and Fairness Inquiry also highlights the importance of the second key element of the SDC's role: the need for an integrated approach to sustainable development. The barriers to sustainable development are varied and complex, and have implications for a wide range of policy areas. The policy approaches to overcoming those barriers need to respond to this variety and complexity, and will require diligent, proactive, and ongoing co-ordination across the range of government departments responsible for these areas of policy.

BEYOND “BUSINESS AS USUAL”

12. A third key message from the Food and Fairness Inquiry was that the barriers to socially just sustainable development are rooted in structural features of “how the world works”. Trade liberalisation, the role of global corporations, the influence of the financial sector, deregulation, socio-economic political orthodoxy, consumption-led growth...these are the factors that underlie the unfairness and unsustainability of our food system. This means that we must fundamentally change the way we live in order to protect the planet for future generations—that is, “business as usual is not an option”.

13. In this regard, a third element of the SDC's role cited above—the focus on the quality of life for future generations—has been crucial. Combined with its independence from government, this has enabled the SDC to look beyond the narrow confines of short-term, sector-specific policy options, and consider the more fundamental, long-term implications of the goal of sustainable development. Reports such as “Prosperity without growth?” exemplify the kind of visionary thinking that must complement more immediate policy analysis and implementation.

THE SDC 2010–2011 BUSINESS PLAN

14. In view of the scale and urgency of the problems we identified in our Food and Fairness Inquiry, the inclusion of “Fairness in Sustainable Development” as one of the five main themes for the SDC’s latest business plan was most welcome. The FEC fully endorses the strategic outcome that is specified for this element of the SDC’s work programme:

“That Government is able to use sustainable development to create policies that tackle disadvantage at the same time as reducing emissions or improving environmental quality.” (p. 20)

15. As well as re-confirming the central place of social justice within sustainable development, the SDC business plan also specifies how it will go about achieving this strategic outcome. Its plans include:

“The SDC will engage government and other stakeholders to identify where substantial co-benefits and synergies can be achieved between policies that help us to live within environmental limits (particularly climate change) and policies which reduce inequalities in health, poverty, crime and other disadvantage”; and

“We plan to use our close relationship with the Department of Health and stakeholders to engage audiences in further discussion on how a sustainable development approach is vital to tackling health inequalities both for the current and for future generations.” (*ibid*)

16. This strategic outcome and the associated work plans would have made a substantial contribution towards the goal of socially just sustainable development. It is essential that they are taken forward, with the same priority and resources, through whatever mechanisms and governance arrangements are introduced as a consequence of Defra’s withdrawal of funding.

DEFRA’S PLANS

17. To date, the indications in this regard are not promising. When the Secretary of State for Environment, Food and Rural Affairs announced the decision to withdraw the SDC’s funding, she stated that her department would assume “the lead role in driving the sustainability agenda across the whole of government”. However, no explanation has been provided as to how Defra intends to perform this function; and given the general context of substantial cuts to departmental budgets, there must be grave concerns about its capacity to devote sufficient resources to this crucial and extensive task.

18. The FEC believes that Defra should provide a detailed account of how it intends to perform its lead responsibility for sustainable development at the earliest opportunity. In this regard, one further finding from the Food and Fairness Inquiry is pertinent (and the involvement of business leaders is especially significant here). The Inquiry Committee identified a number of areas where government needs to show greater leadership in addressing the causes of food-related social injustice (which, as explained above, is a prerequisite for meeting our sustainable development goals). Examples included action on labour standards, nutrition labelling, and leadership in inter-governmental fora. Defra needs to demonstrate how it intends to meet this demand for leadership in tackling the structural barriers to sustainable development.

“THE GREENEST GOVERNMENT EVER”

19. The EAC also requests proposals for how, without the assistance of the SDC, the Government can demonstrate that it is “the greenest government ever”. Taking this to encompass sustainable development in general, our first suggestion is that the Government should endorse the recommendations put forward by the Food and Fairness Inquiry Committee:

- The UK Government should play a leading role in international efforts to reduce food price volatility, by strengthening financial regulation to limit speculation on the price of food—for example, supporting European efforts to set up an agency with a similar mandate to the US Commodity Futures Trading Commission—and by rebuilding public commodity stocks.
- The UK Government should hold the European Commission to its commitments that poor countries should be free to protect their fragile food and farming sectors, ensuring that European Partnership Agreements carry no risk of dumping.
- All publicly-funded institutions undertaking research to promote food security should explicitly ground their research strategies in the principles set out by the IAASTD report and build on the experience of relevant initiatives such as Fairtrade.
- The UK Government should show international leadership in developing resource-based accounting systems that take proper account of natural, human and community capital (in addition to physical and economic capital).
- Identifying and supporting fair models of investment should be a key plank of sustainability strategies for food businesses and government.
- The UK Government should work with the OFT and consumer groups to develop publicly accountable mechanisms whereby businesses can collaborate to make progress on sustainability that is in the public interest.

- Benefit levels and minimum wage rates should be set at levels that allow families to achieve a minimum socially acceptable standard of living, including adequate food and dietary intake, as defined by members of the public.
- The UK Government should reinforce measures that improve health and safety throughout our food supply chains, including enforcement and support for training.
- Public or community involvement should be a requirement for all public sector or publicly financed programmes and strategies relating to food, including initiatives around innovation.
- The UK Government should review the public interest consequences of international trends towards corporate consolidation, and UK and EU options to influence those trends.
- Businesses should, in their CSR reports, state their tax payments as share of turnover for each country in which they operate.
- As the UK's biggest consumer, Government should ensure that it only buys food that has been produced fairly and sustainably, and can help the people it serves eat a healthy diet.

20. The forthcoming parliamentary agenda offers two concrete opportunities for the Government to demonstrate its commitment to these proposals for socially just sustainable development. The first would be to support Joan Walley's Public Bodies (Sustainable Food) Bill, thereby showing leadership through sustainable public procurement. The second would be to ensure that the Bill to establish the Groceries Code Adjudicator is brought forward at the earliest opportunity, and that the provisions of the Bill give the Adjudicator sufficient powers and remit to address bad practice in the grocery supply chain. In particular, the FEC believes that the Adjudicator must have the power to proactively identify and investigate bad practice (rather than being limited to responding to complaints), and that it should from its inception have the power to impose financial penalties.

21. In addition to withdrawing funding from the SDC, Defra has announced its intention to abolish the Agricultural Wages Board. The dual role of the AWB in ameliorating the particular vulnerability experienced by agricultural workers, and in promoting training and skills development, has been a significant factor in promoting the sustainability of UK agriculture. At a time when the need to attract a new generation to farming is widely recognised, the decision to abolish the AWB is both regrettable and perverse. The FEC recommends that Defra reverse its decision abolish the AWB; but if Defra does indeed implement this decision, then it is essential that alternative mechanisms are put in place to safeguard agricultural workers' health and safety, and ensure that the necessary priority is attached to training and skills development.

CONCLUDING REMARKS

22. The FEC would be happy to provide more detailed information about the relevance of our Food and Fairness Inquiry, or other aspects of our work, to the EAC's inquiry. Alternatively, the full text of *Food Justice—the report of the Food and Fairness Inquiry* is available on our website: www.foodethicscouncil.org.

13 October 2010

Written evidence submitted by the “Cradle to Cradle Network”, Lead for the East of England (Partner 8), Suffolk County Council

The Cradle to Cradle Network aims to help regions across Europe to move towards eco-effective societies. This brief response, following the Environmental Audit Committee's invitation to comment on embedding sustainable development across Government, points towards a more positive interpretation of “sustainability” and suggests that a visible ambition and movement to achieve eco-effectiveness (through the development of particular principles) will help the Government to differentiate itself from previous administrations and demonstrate that it is the “greenest government ever”.

1. The Cradle to Cradle Network (C2CN) consists of ten European regions committed to reducing raw materials' utilisation, generating less waste and environmental pollution as well as enhancing economic development, inspired by the concept of “Cradle to Cradle”.

2. There are 10 partner countries in the project. In the UK, Suffolk County Council is the lead authority representing the East of England region. Other regions represented in the project are Lead Partner Province of Limburg (Netherlands), Ovam (Belgium), RDA Milano (Italy), City Graz (Austria), RDA Rhone Alp (France), RDA Kainuu (Finland), RDA W. Pannonia (Hungary), RDA NE Romania and Slovenia.

3. C2CN is an “INTERREG IV C” capitalisation project and is funded primarily by the European Regional Development Fund with contributions from the ten partner regions.

4. Suffolk County Council, on behalf of C2CN, welcomes the opportunity to comment on the Environmental Audit Committee's inquiry on embedding sustainable development across Government. Comments below are set out in relation to each question posed by this inquiry that the C2CN has an interest in responding to.

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

5. In order to improve the “sustainability” of Government operations awareness of true measurements of “sustainability” needs to be raised amongst politicians and within the civil service. “Sustainability” should mean more than reducing the consumption rate or negative impact of an operation to an agreed “acceptable” level. This is only likely to prolong the timeframe for which an operation can be sustained. The world has a finite amount of resources and however “efficient” operations become, if this is not combined with a commitment to using resources in an effective manner (i.e. they never become “waste” but are re-used / upcycled and remain in a chain of utility) then there is a limit to how sustainable any operation can be.

6. The C2CN would advocate a commitment to moving towards an eco-effective approach to operations, whenever possible, to ensure “sustainability” in the truest sense of the word. Eco-efficiency techniques can lead to a reduction of negative environmental effects, but do not encourage real alternatives to the linear “cradle to grave” material flows. Eco-effectiveness, on the other hand, ensures that resources flow in a cycle whereby at the “end” of a cycle they form the beginning or feed stock for a new one. In addition, renewable energy will feed these cycles of production and consumption. If valuable materials are difficult to separate out or reuse at the end of products’ useful life span, materials are gradually dumped or incinerated (with or without energy recovery). Design for eco-effectiveness reduces resource degradation and subsequent loss or “waste” of resources.

7. The C2CN recognises that a period of transition is likely to be required during which eco-efficiency is replaced by eco-effectiveness, but that an ambition to achieve eco-effectiveness is necessary in the present to sit above goals and targets to reduce negative effects upon our environment.

How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

8. Governance arrangements need to reflect and support a move towards an eco-effective approach. The work of the C2CN project is split into four “themes”; industry, area spatial development, build and governance. Conclusions drawn from the governance strand of the C2CN project which will help to inform how governance arrangements may be developed to support an eco-effective approach will shortly be available from our Belgian partner. Initial indications suggest that partnering between customers and suppliers and between individuals in communities will be required to facilitate eco-effectiveness i.e. to establish material partnership communities. Partnering between designer and end user in the context of building, industry and spatial development is essential. Governance structures must facilitate the design of products, buildings and processes including spatial development that is energy positive. (i.e. generating more energy than is consumed). They also need to be “diversity positive” and contribute to biodiversity and social and cultural diversity rather than reduce it. In all situations governance structures need to facilitate the creation of beneficial environmental and social impact rather than simply reducing negative impacts. Metrics need to be devised to monitor movement in this direction.

9. Governance structures should bring parties together to adopt, promote and showcase good practice and emulate success in eco-effective design. They should stimulate innovation in design, spread information and awareness and encourage growth in this area. Ultimately an eco-effective heritage will only result when individuals, communities, businesses and other organisations embrace this concept and work together towards eco-effective implementation in all aspects of their lives.

How, without the assistance of the SDC, will the Government be able to demonstrate that it is “the greenest government ever”?

10. To be the “greenest government ever” requires a new and more positive, proactive approach to our interaction with our environment. This could be achieved by placing emphasis in policy-making and operations across Government departments on the C2C approach of being good (eco-effective) instead of simply less bad (eco-efficient) and promoting the importance of this approach through incentives and benefits for those in all sectors who make headway in moving towards eco-effectiveness.

11. Whenever, and wherever possible, principles which support an eco-effective approach should be considered such as “waste is food” (everything should exist as either a biological or technological “nutrient” for something else, reused within continuous loops), direct use of current solar income and celebrating diversity (using healthy ecosystems as a model for human society—encouraging bio, cultural and functional diversity at a range of different scales).

12. The C2C ® principles discussed above have been interpreted and supplemented with other principles based on local conditions and interests. This has led to the development of the Hanover Principles for the World Expo in 2000, and the Almere and Limburg Principles, developed by provincial governments in the Netherlands. The Limburg principles are;

- We are native to our place.
- Our waste is our food.
- The sun is our income.

- Our air, soil and water are healthy.
- We design enjoyment for all generations; and.
- We provide enjoyable mobility for all.

The development of similar principles for the UK, across government departments and/or development of local principles for UK regions would demonstrate an ambition to move towards eco-effectiveness and a real “sustainable” approach.

13 October 2010

Written evidence submitted by Frank Kennedy, member of Ormskirk and District Friends of the Earth

I wish to make this very brief submission as a member of Ormskirk and District Friends of the Earth.

1. As a voluntary local group, we have only this week become aware of the consultation and as today is the deadline for responses we are unable to make a fully considered response.

2. I am aware that North West Environment is considering a response to the consultation, and indeed have encouraged this body to do so. In my experience, the standpoint of NWEL would carry the confidence of a great many local community organisations which are passionate about the environment and sustainability, as NWEL is an alliance of most of the major voluntary environmental organisations across NW England (including Friends of the Earth regionally).

3. As the resources of NWEL are so slim and the bulk of its work is done on a voluntary basis, it has not been possible to convene members to give due consideration to this consultation before today’s deadline. However, I believe that the outcomes of its forthcoming conference on 27 October (on the theme of The Big Society) will valuably inform your Committee. Ormskirk Friends of the Earth strongly recommends that you take such NWEL representation into consideration, as we are sure that your deliberations will not have concluded by the time you receive it.

4. We are seriously concerned that the abolition of the SDC will remove a valid independent voice from the vicinity of Government and tempt future Ministers, Civil Service heads and political advisers to distance themselves from the “inconvenience” of advice that conflicts with their short-term political or operational interests.

5. However, we note and appreciate the Government’s commitment to the inclusion of local, voluntary and community sector involvement in decision-making and implementing. In this spirit, we urge you to show the flexibility that would allow a broad base of voluntary environmental carers’ views to be taken into consideration [see point 3].

6. In our local area of Ormskirk, West Lancashire, we have anecdotal evidence that a great many businesses and organisations are supportive of the principles of sustainable development as we see them: a linking of our social, economic and environmental needs and benefits—and a rejection of the all too common “trading off” approach which further compromises our future. For example, a local charity North West Ecological Trust is seeking permission to erect a wind turbine which will reduce carbon emissions (powering the Gorse Hill nature reserve site—itsself a notable conservation project) while promoting job opportunities, volunteering and skills acquisition, and an increase in local food growing.

7. We would conclude that the imperative for Government—however this is structurally organised—is to provide the information and genuine incentives for public, private and community organisations, large and small, to achieve economic and social goals only in ways which reduce carbon emissions in line with IPCC and Tyndall Centre findings, and halt the planet-threatening loss of biodiversity and finite mineral resources. Equally, Government, alongside international partners, must provide and enforce effective deterrent penalties to prevent unsustainable conduct—public, corporate and private.

13 October 2010

Written evidence submitted by Friends of the Earth Youth and Education Network

SUMMARY

This submission concerns sustainability within government generally, but also specifically in the Department of Education, in light of the proposed cutting of the Sustainable Schools project. To be “The Greenest Government ever” the government needs to promote values of common-interest, participation, social justice and responsibility towards others throughout all their policies as only this can lead to the co-operation needed to tackle global problems. The Sustainable Schools aspect of the Sustainable Development commission needs to continue and strengthen as all other policies for sustainability affect only the present—sustainability in schools secures the future.

1. *“How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?”*

a. Sustainability must be built into all the new school policies that are currently being written or the idea that this is the “Greenest government ever” is just rhetoric. I understand the government’s dilemma on this, as it conflicts with an understandable move to cut red tape:

“The school Self Evaluation Form (SEF) process takes days out of heads’ time and can cost schools tens of thousands of pounds. The Secretary of State has asked Ofsted to ditch it.”—*Michael Gove* [1]

However, the SEF was the place where a school evaluated how sustainable it was. If schools are not going to be required to do a SEF any more, there needs to be an alternative way for the sustainability of schools to be measured. As you will be aware, only things that are measured will be prioritised. If you do not measure sustainability in schools, you are sending a message that is not important.

b. In writing the policies for the new academies and free school, there needs to be built in an obligation to embed sustainability into their curriculums and cultures. In the application guidance to apply for a new free school, there is a request to:

“Please set out the Free School’s aims and objectives. You should also describe:

- the teaching methods that will be used and whether the Free School will follow a particular philosophy (e.g. Montessori);
- the outline of the Free School’s proposed curriculum, including any religious ethos;
- how the Free School will improve pupil learning and ensure strong discipline;”—*Free Schools—Proposal Form* [2]

There could be an additional request to describe, for example, “How the Free School will embed sustainability into the culture and curriculum of the school”. If this is not seen by the government as an essential aspect of a Free School, this would point to a serious lack of commitment to sustainability. I appreciate the government’s wish to allow freedom in the curriculum and ethos, but ensuring a sustainable future for children cannot be compromised. Only if all schools are expected to become sustainable will sustainability truly be embedded into our future.

c. The new “slimmed down” curriculum will also need to include sustainability as a core principle:

[Not just in the range of subjects, qualifications and pathways in schools, but] the entire planned learning experience of the child or young person, in other words everything the school as a community intends to lay before them for learning. That breadth means lessons, rules and routines in corridors, changing rooms, playground, the regular round of assemblies, visitors into school (theatrical, business, connected to religion/belief), meetings and dialogues with young people from elsewhere, learning outside the classroom, and what happens in the schools dining room and kitchen. Children and young people can learn as much from the ethos, ways and rituals of the school community as they do from content in lessons.—*Mark Chater* [3]

d. In terms of procurement, sustainability criteria must apply to school meals, school supplies and new school buildings. New schools must be built from durable materials with the smallest environmental impacts possible, reusing materials from the old buildings if possible, or at the very least, these old materials should be resold to other builders for re-use. Renewable energy and energy saving measures should be of a very high standard.

2. *How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?*

The current measure of GDP only considers the amount of money generated in our country—including money generated by rebuilding from floods, clearing up environmental disasters and polluting industries. If GDP continues to be held up as the only important measure of our country’s success and sustainability reporting is left hidden within the EAC, improving our sustainability will never be seen as important enough to merit serious consideration. The only way to make sustainability reporting more transparent and accountable is to make it part of the national measure of success, instead of a separate measure which people can choose to ignore and disregard. In other words, a more holistic measure than GDP which includes wellbeing and sustainability is needed. For example,

“The Happy Planet Index (HPI) provides that compass by measuring what truly matters to us—our wellbeing in terms of long, happy and meaningful lives—and what matters to the planet—our rate of resource consumption. The HPI brings them together in a unique form which captures the ecological efficiency with which we are achieving good lives.”—*New Economics Foundation* [4]

Using a new measure of success for the UK such as the HPI would show an outward commitment to sustainability. Something that is in the public eye in this way will naturally come under more scrutiny and will therefore be more transparent and accountable.

3. Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

a. The DCSF's Sustainable Schools Strategy was built on the foundations of the Sustainable Development Strategy and the Children's Plan. As the aim was for all schools to be sustainable schools by 2020, this work still has a long way to go before reaching its natural end. Even after 2020 there would need to be a continuing role for the Sustainable Schools Strategy to help new schools, new teachers and the continuing development of sustainability.

b. For there to be an "enhanced departmental capability and presence" as this inquiry states, the Sustainable Schools Strategy will need to be retained and strengthened in the education department. We need a system such as Sustainable Schools which sets a standard for schools to work towards, as part of the core curriculum and embedded into Ofsted inspections. If there is no inspection by Ofsted, there is no imperative for Headteachers to help young people to participate in it.

c. The strategy is popular with schools, who can see its huge value and potential:

"Unlike many "initiatives", the Sustainable Schools framework is a gem on so many levels and if anything, it needs additional support, not less, to enable more schools to engage in a meaningful way. Carried out properly it meets many national indicators, meets Kyoto & COP agreements, contributes to increased awareness of climate change and how to reduce it, as well as showing the children that we as the-current-adults-in-charge take their futures seriously."— *A teacher contributing to the Government's "Spending Challenge" website* [5]

d. However, after writing to the Department for Education asking for the Sustainable Schools Strategy to be kept, I received a letter containing the following:

"It will still be up to schools to decide if becoming a sustainable school is the best way for them to operate, and the greater flexibility in the curriculum will allow schools wishing to do so an excellent opportunity to incorporate the teaching of sustainability into a broad and balanced curriculum."—*Letter from Jayne Watson, DfE* [6]

This implies that schools will not be encouraged or helped to become sustainable schools. This is, in effect, abandoning schools who are trying to do the right thing and degrading the importance of sustainability with children, parents, teachers and the wider community—all of whom were involved in the Sustainable Schools Strategy. I wonder what proportion of the population could encounter positive messages of sustainability through the Sustainable Schools Strategy will not if it is not cut.

e. I think the importance of schools in creating a sustainable society must not be underestimated. If the future is to be sustainable, the people who will be running the future—today's children—need to be included and enabled to play a full part. It will not be enough if the only children to appreciate the full implications of sustainability are those whose schools choose to prioritise it. The Sustainable Schools aspect of the Sustainable Development Commission needs to continue as all other policies for sustainability affect only the present—sustainability in schools secures the future.

4. In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (e.g. to develop "sustainability reporting" in departments' accounts) and the contributions that other bodies might make (eg Centre of Expertise in Sustainable Procurement)?

Is tying sustainability reporting into accounts fundamentally a good idea? Doesn't this imply that sustainability is only good as long as it saves money and makes consideration of sustainability secondary to economic considerations? Sustainability reporting, I think, needs to be separate and have its own value or to be part of an overall measure of success like the HPI as in section 2.

5. How, without the assistance of the SDC, will the Government be able to demonstrate that it is "the greenest government ever"?

a. The only way to demonstrate true green credentials is to ensure that the VALUES needed for the development of sustainability are embedded throughout all government policy and ways of working. The values promoted by government and wider society must be those of acting in the common-interest, participation, social justice and responsibility towards others. [7]Sustainability can only be achieved if people are concerned with others around the world and in the future, rather than only themselves in the present.

b. Big Society is an inclusive, co-operative vision—but these values do not seem consistent throughout policies. For example, Minister for the Cabinet Office, Francis Maude, promoted the above sustainability values when he said of National Citizen Service:

"We know that across the country many young people are ready to stand up and make a difference to their local community. We see NCS as key to building a Big Society, to increasing engagement, cohesion and responsibility for young people across the country."

"This programme will allow a whole generation of young people to make a difference in their local area and play an active role in making society a better place."—*CO press release* [8]

Yet the values that will lead to young people wanting to be involved in this are not being promoted in schools—the government are:

“...asking Ofsted to change their framework to focus on four principal areas: the quality of teaching, the effectiveness of leadership, pupils’ behaviour and safety, and pupils’ achievement.”—*From a Michael Gove press notice, 23 September (reducing bureaucracy)* [1]

These headline criteria seem to be at odds with the values of the Big Society and of future sustainability. The children will be taught, controlled, disciplined, protected and assessed throughout their time in school—and only in the schools that choose to prioritise it will they become the informed, creative, motivated and empowered citizens we need.

It is realistic to assume that after a two week “National Citizen’s Service” at age 16, children used to being taught, lead and controlled will morph into fully thinking, engaged adults ready to lead the country into sustainability?

c. As another example, the government intend to

“...continue to offer parents more choice with the expansion of academies and the free school programme.”—*Letter from Michael Gove* [9]

Yet increased parental choice in itself is an appeal to self-interest values. Instead of making every school a good school so children can walk there and meet friends who live close to them which strengthens communities, this policy encourages parents to drive their children far from where they live. It encourages competition for places in good schools and new schools, whilst taking resources from struggling schools, which could be forced to close. Inherent in this is waste and replication of resources, as more schools are built than are needed and other schools decline.

d. Fundamental analysis needed of the conditions to ensure sustainability. It is no good to keep promoting business, consumerism, lack of community, etc, in most policies, then trying to stick SD on top like a plaster. SD is a way of thinking.

e. To show it is “The Greenest Government ever”, there is a need for an open debate—or at least an explanation from government—about what values really matter to them, so we, the public, can see the reasons behind the policies that are being set.

REFERENCES

[1] From a Michael Gove press notice, 23 September (reducing bureaucracy).

[2] Free Schools—Proposal Form.

[3] Mark Chater, QCDA, September 2010.

[4] New Economics Foundation.

<http://www.neweconomics.org/publications/happy-planet-index-20>

[5] A teacher contributing to the Government’s “Spending Challenge” website
file:///C:/Users/Rachel/Documents/Youth%20and%20Education/Sustainable%20Schools%20campaign/Sustainable%20schools%20press%20release%2020_08_10_final.doc>

[6] In a letter from Jayne Watson, Public Communications Unit.

[7] Common Cause, The Case for Working with our Cultural Values, September 2010.
http://www.foe.co.uk/resource/reports/common_cause_report.pdf

[8] Prime Minister to launch National Citizen Service pilots for young people, CO press release 22 July 2010
http://www.cabinetoffice.gov.uk/newsroom/news_releases/2010/100722-citizenservice.aspx

[9] From letter to Christopher Trinick (QCDA) from Michael Gove, 15th September.

14 October 2010

Written evidence submitted by the British Standards Institution (BSI)

As the UK’s National Standards Body, BSI welcomes this opportunity to comment on this inquiry.

BACKGROUND

1. BSI is the UK’s National Standards Body (NSB) and was the world’s first. It represents UK economic and social interests across all of the European and international standards organizations and through the development of business information solutions for British organizations of all sizes and sectors. BSI works with manufacturing and service industries, businesses, governments and consumers to facilitate the production of British, European and international standards.

2. Much of the market knowledge and expertise BSI has resides in its committee structure. BSI has a large number of committees of experts representing a broad range of stakeholders, and this promotes the development of consensus views regarding standardisation where this is deemed important.

- BSI has a portfolio of standards that enable organisations to address their sustainability impacts; the portfolio includes the world’s first national standard on managing sustainable development, BS 8900:2006.
- BSI published a guidance standard on Sustainable Procurement, BS 8903:2010, which can be used by any organization and has had major government involvement.
- In formulating a future architecture for sustainability and demonstrating it is the “greenest government ever”, government should be actively involved in developing new standards in the area of sustainability. It should also use existing standards that can increase its sustainability performance.

3. British Standards are developed by bringing together the key interested parties in a transparent process that has no commercial bias. Representatives from small businesses, government, NGOs, consumers, labour organisations, academic institutions and industry sectors sit on committees to develop consensus-based documents. The result is standards that are voluntary to use, while being supported by all stakeholders.

4. In 2006, BSI published the first standard on sustainable development: BS 8900:2006—*Guidance for managing sustainable development*. It is a principle-based approach for any organization (large multinational, SME, public or third sector) to embedding sustainability across its practices. It is the first standard to take an integrated approach to managing social, environmental and economic issues. The centrepiece of the standard is a sustainable development maturity matrix which helps to identify the amount of progress achieved to date and the future direction for sustainable development within an organization. This matrix would assist government in establishing how it is currently progressing towards sustainable development as well as potentially being adapted to assist in policy making.

5. BS 8903:2010—*Principles and framework for procuring sustainably—Guide* gives recommendations and guidance on how to adopt and embed sustainable procurement principles and practices across an organization (public, private or third sector) and its respective supply chains and provides practical information to support implementation. It includes guidance on measurement to help organizations assess the extent and effectiveness of their sustainable procurement activity. The standard has been produced to be compatible with the Flexible Framework, which was produced by the Government’s Sustainable Procurement Task Force in 2006. It also has a separate Annex which deals specifically with issues around the EU Procurement Directive. There was committed involvement of government in the drafting of the standard and it is clearly a valuable tool for government to improve the sustainability of its procurement practices.

6. There are numerous other standards in BSI’s portfolio that address sustainability issues, key others include:

- BS EN ISO 14001: 2004—*Environmental management systems. Requirements with guidance for use* (plus other standards in the 14000 series).
- OHSAS 18001: 2007—*Occupational health and safety management systems. Requirements*.
- BS ISO 26000: 2010—*Guidance on social responsibility* (to be published 1 November 2010).
- BS EN 16001: 2009—*Energy management systems. Requirements with guidance for use*.

7. By using the standards in BSI’s sustainability portfolio the government can demonstrate its commitment to sustainability and make considerable improvements to its environmental, social and economic performance. As highlighted above, BSI brings together all interested parties and draws on existing developments, initiatives and contributions from all types of organization. Therefore, working with BSI will enable government to build an architecture for sustainable development without the assistance of the Sustainable Development Commission.

BSI BACKGROUND

8. BSI is the UK’s National Standards Body, incorporated by Royal Charter and responsible independently for preparing British Standards and related publications. BSI has 107 years of experience in serving the interest of a wide range of stakeholders including government, business and society.

9. BSI presents the UK view on standards in Europe (to CEN and CENELEC) and internationally (to ISO and IEC). BSI has a globally recognized reputation for independence, integrity and innovation ensuring standards are useful, relevant and authoritative.

10. A BSI (as well as CEN/CENELEC, ISO/IEC) standard is a document defining best practice, established by consensus. Each standard is kept current through a process of maintenance and reviewed whereby it is updated, revised or withdrawn as necessary.

11. Standards are designed to set out clear and unambiguous provisions and objectives. Although standards are voluntary and separate from legal and regulatory systems, they can be used to support or complement legislation.

12. Standards are developed when there is a defined market need through consultation with stakeholders and a rigorous development process. National committee members represent their communities in order to develop standards and related documents by consensus. They include representatives from a range of bodies, including government, business, consumers, academic institutions, social interests, regulators and trade unions.

13 October 2010

Written evidence submitted by Cisco

SUMMARY

- The decision to withdraw funding from the Sustainable Development Commission (SDC) should be seized upon as an opportunity by Defra to provide real leadership, join up activity across government and to put in place a single cross-government policy designed to reduce unnecessary travel.
- We believe that the Government's drive to become the "greenest government ever" should be broadened out to include reducing emissions associated with travel, and we call for a much greater emphasis to be placed on using communications-based alternatives to travel like video conferencing.
- To fully realise the role that video conferencing can play in reducing emissions across government departments, we believe that greater incentives need to be put in place to encourage a step change in current practice. Departments should rank means of travel hierarchically based on carbon emissions per mile, cost to the public purse and other considerations like improved safety, with a central Defra policy dictating this and departments strictly enforcing it.
- In this very tight Spending Review, we believe this area has considerable potential as a further source of efficiencies and savings. Testament to this, the SDC's most recent report states that government is saving £60–70 million a year as a result of moves towards more sustainable operations, and that further progress in this area has the potential to save hundreds of millions more, for example by reducing travel.

INTRODUCTION

1. Cisco is a leading global provider of visual communication products and services. We design, develop and market systems and software for video, voice and data, and provide sales, support and value-added services in more than 90 countries worldwide.

2. Governments throughout the world are using visual communications to speed up decision-making, provide public servants with increased access to experts and reduce their environmental impact. We have been at the forefront of this development. In the UK, we work with a range of public sector organisations including the emergency services, schools and local education authorities, universities, primary care trusts and central government departments. We also provide services for some of the leading private-sector companies in the country.

3. The inquiry is wide-ranging and deals with a number of areas which it would not be appropriate for us to comment on. Our expertise relates to the use of communications-based alternatives to travel like video conferencing across government. In this response, we set out the findings of our latest research into the use of the technology by government departments, and our recommendations for how this could be improved, switching government departments away from unnecessary travel towards a more financially and environmentally sustainable way of working.

CONTINUING THE WORK OF THE SUSTAINABLE DEVELOPMENT COMMISSION

4. Over the past decade we followed the work of the SDC closely, and worked with commissioners on several occasions. The period saw the SDC emerge as a critical friend of Government and its scrutiny, capability building and policy advice saw slow, but significant progress across government departments—both in terms of day-to-day management and in embedding sustainability considerations into the policy making process.

5. In the context of this very tight Spending Review, we recognise that difficult decisions have to be made by government, not least Defra's decision to withdraw funding from the SDC from the next financial year. We pay tribute to the important contribution the SDC made in putting sustainability on the political map, and in making government operations more sustainable. This work must now be taken forward by Defra from within government.

6. In this period when Defra considers how it can take the lead role on sustainability in place of the SDC, it is important that the department acts quickly to maintain the momentum. Defra should now produce a detailed plan setting out how it will maintain a degree of independence from Government in order to fulfil its watchdog role, and explain the mechanism by which it will measure progress and hold government to its pledge to become the "greenest government ever".

7. As part of this process Defra should recognise the potential of this area as source of further efficiencies and savings for government departments. Moves towards more sustainable operations are already saving £60–70 million every year according to the SDC's most recent annual report. These savings are just the tip of the iceberg, and further progress in this area has the potential to save hundreds of millions more, often without significant new investment.¹³

8. For example, the public sector currently spends around £3.03 billion a year on travel. Whilst we know some travel is unavoidable, evidence from the private sector suggests travel spend can be reduced by as much as 30% through better use of communications-based alternatives to travel like video conferencing. This means there may be potential for the public sector to save as much as £900 million a year, as well as to significantly reduce carbon emissions. This figure excludes the additional savings on hotel and subsistence costs that would result from reduced travel, as well as the staff time efficiencies that would follow.

OUR RESEARCH

9. As part of this inquiry, the Committee will consider the latest sustainable development performance data across government departments. To add to your evidence base, we would like to share the findings of our most recent Freedom of Information-based (FOI) research into the progress of government departments in reducing unnecessary travel through communications-based alternatives to travel like video conferencing.

10. The following table provides details of responses received to FOI requests from February 2010, which asked for details of the number of video conferencing units owned by each government department. We have placed them next to figures from 2007 to allow for direct comparison.

<i>Department</i>	<i>Number of VC units 2007</i>	<i>Number of VC units 2009</i>
Department for Business, Innovation and Skills	22*	28
Cabinet Office	21	15
Department for Children, Schools and Families	60	99
Department of Communities and Local Government	4	18
Department for Culture, Media and Sport	3	3
Ministry of Defence	No response received	300
Department of Energy and Climate Change	Did not exist	3
Department for Environment, Food and Rural Affairs	15	17
Foreign and Commonwealth Office	53	249**
Government Equalities Office	N/A	0***
Department of Health	36	57
Home Office	14	10
Department for International Development	111	170
Ministry of Justice	16	25
Northern Ireland Office	7	7
Scotland Office	No response received	2
Department for Transport	8	9
HM Treasury	14	7
Wales Office	2	2
Department for Work and Pensions	275	349

* Then the Department for Business, Enterprise and Regulatory Reform.

** The Foreign and Commonwealth Office also has 12,500 WebEx licences for online video conferencing.

*** Although the Government Equalities Office does not own video conferencing units, it does make use of the equipment owned by other departments.

11. The following table provides details of responses received to FOI requests from February 2010, which asked for details of the number of video conferences taking place in each government department. We have placed them next to figures from 2007 to allow for direct comparison.

<i>Department</i>	<i>Frequency of VC use 2007</i>	<i>Frequency of VC use 2009</i>
Department for Business, Innovation and Skills	Daily*	No records
Cabinet Office	No records	No records
Department for Children, Schools and Families	Daily, with 1,060 conferences taking place in June 2007	10,910
Department for Communities and Local Government	359 conferences last year	262
Department for Culture, Media and Sport	At least once a month	54

¹³ *Becoming the "Greenest Government Ever": achieving sustainability in operations and procurement*, Sustainable Development Commission, July 2010.

<i>Department</i>	<i>Frequency of VC use 2007</i>	<i>Frequency of VC use 2009</i>
Ministry of Defence	No response received	20–30 times daily
Department of Energy and Climate Change	Did not exist	Several times a day
Department for Environment, Food and Rural Affairs	Daily, with 339 conferences taking place between January and May 2007	1,456
Foreign and Commonwealth Office	846 conferences in 2006	21,280
Government Equalities Office	N/A	N/A (does not own video conferencing units)
Department of Health	Daily	13,972
Home Office	340 conferences in 256 days	No records
Department for International Development	Over 500 conferences per month	7,283
Ministry of Justice	No records	Over 1,300
Northern Ireland Office	Daily	2,151
Scotland Office	No response received	433
HM Treasury	No records	No records
Department for Transport	Average of 46 conferences per month	231
Wales Office	Daily	208
Department for Work and Pensions	Over 1,000 hours per month	9,871

12. Please note the figures above may not include the number of ad-hoc or “point-to-point” video conferences that take place, and may only show those that are booked in advance through a central reservation system. This is usually done when there are more than two users present in the meeting. The actual usage is therefore likely to be far higher for many departments. Nevertheless, this provides a useful snapshot for comparative purposes.

13. We found that many of the problems we identified in 2008, when we last carried out similar research, still persist. There is a clear problem with government departments not recording travel adequately, making it difficult to build up an overall picture of how much is spent on travel and incentivise civil servants to seek alternatives. For example, only 15 departments of the 20 we asked were able to provide detailed travel spend data. Where the costs were measured, the processes used varied between departments, making it very difficult to compare and contrast spend across government.

14. In terms of communications-based alternatives to travel like video conferencing, our research found that departments with an international focus like the Department for International Development, the Foreign and Commonwealth Office and the Ministry of Defence continue to have the greatest number of video conferencing units, but there are now signs that domestic departments are increasingly looking to the technology as a means of reducing the need to travel within the UK, with corresponding savings and environmental benefits. The Department of Health, for example, has invested in 21 extra video conferencing units since 2007.

15. We also found that with the exception of the Cabinet Office, HM Treasury and the Home Office, all other government departments have maintained 2007 levels or purchased additional video conferencing units, whilst larger departments such as the Department for Business, Innovation and Skills and the Department for Work and Pensions have invested in telepresence suites which link their London headquarters with regional offices.

16. Of note, the Department for Business and Innovation and Skills carried out a cost benefit analysis before investing in video conferencing and telepresence suites to reduce the need for travel between London and Sheffield. This estimated that reduced travel for staff members of (up to) four meetings per day, was equivalent to savings of £440,000 per annum when the facilities are fully utilised.¹⁴

17. However, although there are some examples of progress in this area, we found that there are vast differences in how different departments use video conferencing, and how use of the technology is promoted internally. There is also still no central cross-government policy advocating the use communications-based alternatives to travel to minimise unnecessary travel.

18. Finally, in our experience, the departments that benefit most from the technology and deliver the greatest environmental and financial savings are those which actively promote the use of video conferencing internally. This could be through an internal marketing campaign to increase awareness of the technology, ensuring that officials have to consider video conferencing when filling in their travel request forms, creating a simpler way to book video conferencing units, or hosting induction sessions for new staff to train them on how to use the technology.

¹⁴ Hansard, HC, 7 April 2010: Column 1407W.

RECOMMENDATIONS

19. We present below a set of recommendations which aim to switch government departments away from unnecessary travel towards a more financially and environmentally sustainable way of working.

20. We recommend that as Defra considers how to mainstream sustainability, strengthen Government's performance in this area and put processes in place to join up activity across government more effectively, it considers policies that:

- rank means of travel hierarchically based on carbon emissions per mile, cost to the public purse and other considerations like improved safety, with strict enforcement of this hierarchy;
- put in place a presumption against travel for the vast majority government departments with any exceptions to be signed off by a senior manager;
- put in place a single system of collecting departmental travel data and a linked system of monitoring the use of communications-based alternatives to travel like video conferencing so that comparable data is collected and areas for improvement can be easily identified; and
- embed the consideration of travel impacts early on in the development of all policy.

15 October 2010

Written evidence submitted by the Department for Work and Pensions

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SUMMARY

- The Department has a pivotal role in supporting social and economic sustainability and reducing its environmental impact. It has introduced guidance and toolkits for policy makers and procurement and operational staff to promote and encourage more sustainable proposals and outcomes. We are currently discussing ways to ensure consistent implementation.
- The impacts of climate change on people will shape not only what the Department needs to do to adapt its core policy and operations so that it can continue to successfully deliver its objectives, but also shape how it works internally and across government to deliver effective solutions such as reduced carbon emissions.
- In 2007, the Department published a 3-year SD Action Plan and, in March 2010, a Carbon Reduction Delivery Plan and Climate Change Adaptation Strategy. Together, these explain the overall plans for integration of sustainability within the Department, and also how it plans to mitigate climate change and adapt to its inevitable consequences. The Department has published an SD Annual Report since 2001 setting out its progress and future plans. All of these documents are available online.¹⁵
- The Department has a recognised history of sustainability delivery. It is deeply embedded within operational management and the Department already meets, or is on track to meet, the targets for Sustainable Operations on the Government Estate (SOGES). The Department recognises, however, that it has more to do to fully embed sustainability within policy development, and work is ongoing to address this.
- It is essential that we build on the good work taking place across departments by more fully embedding sustainability principles within pan-government policy development and governance processes, and then ensuring compliance through firm leadership.
- This memorandum provides a summary of DWP initiatives and views on further mainstreaming of sustainability.

SECTION 1—INTRODUCTION

1. Sustainability is about meeting the needs of the present without compromising future generations' ability to meet their own needs, taking full account of social, environmental and economic impacts in all decisions. The Department clearly has a pivotal role in socio-economic elements through its work to improve social inclusion, reduce poverty and support the most vulnerable in society.

¹⁵ <http://www.dwp.gov.uk/about-dwp/sustainable-development/>

2. The Department also recognises that its policies and operations have a considerable environmental impact and it's responsibility to reduce that impact. Considerable work has been done to embed sustainability principles within the Department core policies, plans and operations. There remains more to do, but if the mainstreaming of sustainability is to be achieved there need a clearer and firmer focus across government.

3. The following paragraphs provide the Department's view on the specific questions asked by Environmental Audit Committee.

SECTION 2—ROLE OF THE SDC AND THE FUTURE WITHOUT IT

4. The Department appreciated the assistance provided by the SDC on the wider aspects of sustainability, particularly in supporting the principle of cross-departmental impact analysis and mitigation. The Department was therefore happy to approve the SDC's request to pilot their new Departmental Sustainability Assessment (DSA). The DSA gave an independent opinion on the extent to which embedding of sustainability had been successful and what more could be done to ensure/assure integration. The SDC's very helpful draft report has just been received and comments returned. The Department believes there would have been value in the SDC continuing this work in other key departments.

5. SDC's recent draft DSA made clear that there remains room for improvement in embedding sustainability within the Department's policy making. Whilst guidance and tools are in place for policy makers, there is a lack of consistent application of them and therefore insufficient evidence of impact analysis and mitigation. Work is ongoing to address this, using the DSA as evidence.

6. The Department found the process of the SDC undertaking the pilot DSA very useful, as it gave an independent view of the extent of application. The Department feels there would be value in an independent audit, perhaps by National Audit Office, into embedding across government.

7. The Department believes that the work of the SDC was valuable in providing independent opinion on departmental SD in Government (SDiG) returns. However, the protracted period between the data period, its reporting cycle and the SDC assessment meant that their comments could be up to two years outdated, many or most of which had subsequently been cleared. For example, stating that a department was x% behind on its energy target has little value when, by that time, it is already known that a further improvement has been made. Any future independent assurance mechanism (see "Areas for Improvement") needs to be undertaken quickly to have value.

8. It is impossible to identify savings accruing from SDC recommendations, be they at an "embedding" level or operationally. Many savings have been made (for instance, £8million p.a. on energy) but these are attributable to many different initiatives.

SECTION 3—PAN-GOVERNMENT MECHANISMS AND GOVERNANCE.

9. A long standing commitment exists to embed sustainability throughout policy development and decision making. This was addressed explicitly in the 2005 UK SD Strategy and subsequently supplemented by additional requirements such as the inclusion of carbon emissions within Impact Assessments.

10. The Department already meets, or is on track to meet, SOGE targets for energy, water, waste, road travel, procurement etc (see "Key Achievements"). It is now working with key NDPBs to integrate their activities.

11. The Department is working closely with colleagues in other departments to encourage the introduction of further mandatory measures to ensure consistent appraisal of key sustainability impacts such as carbon, climate change adaptation and social aspects that need consideration within policy development across government.

12. The Department believes that the process to assure this consistency is unclear and, whilst recent improvements such as the sustainability Specific Impact Test have assisted, governance and "policing" of appraisals needs to be clarified and tightened to ensure that policy and strategy proposals receive robust analysis. DEFRA have indicated that the "value of the natural environment" will also need to be impacted, although this is work in progress.

13. The Department also believe that the pan-government governance process for sustainability requires streamlining to ensure integration and consistency. Currently, sustainability policy, operations and procurement, and climate change adaptation are governed through separate programmes chaired and led by different departments (DEFRA, Cabinet Office and DECC respectively). There is no overall strategy which integrates these activities, prioritising them as one single programme and therefore aligning expectations on departments and avoiding duplication and gaps. The Department believes that, ideally, a single overseeing Board should govern the individual strategies and the overall programme, chaired by a single department who would take the overall lead on the programme. This would also streamline reporting structures and minimise duplication, enabling departments to focus on outcomes.

14. Work is ongoing across government to identify what it aims to achieve on social sustainability. This needs to have a clearer focus and robust objectives to ensure that social and environmental factors receive equal weighting in the development of policy and strategy.

15. The principle of reporting through the SDiG process is more than adequate to monitor performance. However, the scope of questioning needs to remain static wherever possible to give an accurate year on year picture of progress, with departments being given adequate lead in periods for the gathering of new data. The size and scale of departments also needs to receive greater consideration, as each department has its own difficulties in delivering against targets, increasing with that department's scale.

16. It is essential that government and departmental reporting is robust and transparent, particularly ensuring we are well placed to meet the requirements of the International Financial Reporting Standards and the CRC Energy Efficiency Scheme. Currently, SDiG provides a high degree of assurance by identifying performance outside of expectations.

17. But there is no third party verification of departmental returns. It is essential that independent audits, perhaps by the National Audit Office, take place on sustainability reports to ensure and demonstrate consistency and robustness of data. There is the opportunity for this to be built into the new SDiG process. It could, however, add to the length of the reporting process, increase costs and will clearly need to demonstrate value for money to the cost conscious public. This could be undertaken through "system audit" of the processes involved in departments and the sampling of actual data, thereby assessing the robustness of the process whilst being relatively light touch. This could allow the assurance to be undertaken quickly (i.e. ongoing assurance of data throughout the reporting year) to maximise its value.

18. As part of any reporting process it is important to recognise past improvements, as these will always affect an organisation's ability to deliver further savings. Currently, there is insufficient recognition of current position when developing future targets, which could be addressed by comparing performance to best practice benchmarks as well as ongoing targets.

19. Integrated reporting tools are also essential if we are to ensure that government is fully accountable for its impacts. The Department is working closely with the Efficiency Reform Group to develop a pilot Carbon Management Tool for government. This is designed to be low cost (integrating within existing systems) but to automate and streamline the process as much as possible to enable departments to focus on outcomes rather than reporting.

SECTION 4—FUTURE MEASURES TO EMBED SUSTAINABILITY

20. A comprehensive impact assessment toolkit has been developed by the DWP Sustainability and Climate Change (SCC) Team and Jobcentre Plus. This was based on DEFRA's "Stretching the Web" tool, but refined and enhanced to address specific issues of relevance to the Department. The toolkit is aimed at the earliest stage of policy development (where the greatest opportunity exists to influence outcomes). It provides an initial assessment of potential impacts scores them and produces a graphic (web), providing a simple check that a comprehensive and relevant range of issues have been considered. The SCC Team is working with the Department's Policy Professionalism Capability Team to identify how to embed the toolkit consistently across all policy development.

21. Adaptation to Climate Change is a key theme being built into the Department's processes, both at the above "embedding" level and also within business continuity planning. This will ensure that potential climate change impacts on policies such as Winter Fuel Allowance and the Social Fund are considered, but also the potential impact on the Department's operations and staff. Further aspects are identified within the Department's Climate Change Adaptation Plan.

22. Autumn 2010 will see the installation of a Combined Heat and Power unit in one of the Department's largest buildings (Quarry House, Leeds) which will save £93,000 and 428 tonnes of CO₂ per year. The CHP is funded through the Salix scheme. The Department is working with the Carbon Trust to identify other potential funding schemes for long payback low-carbon initiatives such as solar, wind and biomass. It is also looking at the potential to use feed-in tariffs to incentivise on-site generation.

23. On IT, the Department's Data Centre is being moved to a new energy efficient facility, and "thin-client" technology is being introduced to replace PCs, and multi-function devices to replace printers, scanners and faxes. Telephony possibilities are also being assessed.

24. As part of the new DWP *AWaRE* campaign (*Avoid Waste and Reduce Energy*) volunteer "Energy Champions" are in place across the Department's sites to ensure local engagement. In addition, the Environment brief is being added to Health and Safety Committees or "House Committees" to further integrate local ownership. To ensure opportunities when replacing equipment at the end of its life are maximised, the Department is working with the Building Research Establishment to identify "best in class" equipment that could be installed under the PFI or invested in under the "spend-to-save" scheme. In addition, the Department continues to build home and tele-working and low-carbon location choices into its Estate Strategy.

25. Further initiatives are identified within the Department's Carbon Reduction Delivery Plan, supported by its sign up to the Carbon Trust's Carbon Management Programme.

SECTION 5—KEY ACHIEVEMENTS

26. **Energy use and carbon emissions reduced by 23%** in the last three years —11% in 2007–08, 3% in 2008–09 and 9% in 2009–10. This latter year is particularly significant, with continuing reductions despite increased demand for services leading to longer opening hours, more staff and more IT. **Per annum, this saves approximately £8 million and 70,000 tonnes CO₂** through a combination of technical and “housekeeping” measures such as:

- joint campaign with Telereal Trillium to implement no-cost and low-cost measures, challenge behaviours and encourage buy-in;
- intranet based “Energy Pack”—good practice guidance and reports to inform and encourage staff;
- “Smart Meters” on largest 600 sites (90% of total electricity usage), adding gas and water readings where possible, enabling “next-day” rectification of issues and demonstrating campaign results;
- 41,000 national “spend-to-save” measures.

27. The Department was awarded the **Carbon Trust Standard** this year, ranking it alongside well known “green” organisations such as Marks and Spencer and Asda. The Department is, we believe, the largest UK public sector organisation to hold the Standard.

28. **Water consumption reduced by over a third (400,000m³)** in the last four years, through a programme of improved data collection, leak detection, installation of waterless urinals and campaigns with staff.

29. The Department was awarded **“5 out of 5” for sustainable procurement** (Flexible Framework) in SDiG reporting period (April 2008—March 2009).

30. **Waste generation fell by 44%** in the last five years and recycling has consistently achieved 62–66%. Particular popular is the intranet-based “swap shop” where staff nationally advertise and swap surplus or wanted items of office equipment/stationery, reducing waste and procurement costs.

31. **Road mileage has reduced by 20% (grey fleet by 40%)** in the last three years, and **CO₂ from road travel by 35%** (8,000 tonnes).

32. The Department has won a number of **awards** in the past few years:

- Mayor of London’s Green 500 “platinum” award (both 2009 & 2010).
- Short-listed for Civil Service Diversity and Equality Awards 2010.
- Government Finance Profession Sustainability Award 2008.
- GO Excellence in Public Procurement SP Award 2007.
- Various Green Apple awards.
- Building Magazine Sustainability Award 2005.
- Premises & Facilities Mgt “Partners in Sustainability” Award 2003.

15 October 2010

Further written evidence submitted by the Department for Work and Pensions

What procedures specifically initiated in the department have been most successful in improving sustainable development? Why have these worked well? Which procedures have not worked and why?

- The Department recognised the need for a dedicated Sustainability and Climate Change (SCC) Team. The team is responsible for all aspects of sustainability (policy, strategy, communications, monitoring, reporting and operations). This includes managing the Department’s carbon budget and the key environmental outcomes of its estates partner Telereal Trillium. The ethos is mainstreaming, the team influencing **existing** policy and process rather than re-inventing it.
- Sustainability is handled corporately, integrating activity across corporate groups, businesses, agencies and arms-length bodies. Intranet information is available, ranging from how staff can help reduce carbon emissions at work and at home to considering sustainability in policy making. Content is reviewed regularly, engaging staff by being topical and seasonal.
- Sustainability is integrated within the Department’s Change Lifecycle process from initiation through to completion, and the SCC Team have access to project documents as they develop. A checklist has been developed to enable Ministers’ private office staff to check that submissions have considered all aspects of sustainability.

-
- The contract with the estates service partner incentivises energy and water reductions by sharing monetary savings between the Department and estates service partner encouraging joint working. It also allows estates service partner to develop business cases for “over and above” spend-to-save measures (for example, measures that would not be covered under the contract. They agree them with the Department, fund them and then recover their investment from accrued savings. This means that the risk remains with estates service partner, that no departmental funding is required, but that the Department receives a half share of all savings following investment recovery, demonstrating value for money and incentivising improvements that would otherwise be unlikely to occur.
 - Verification of the data on operational performance is primarily undertaken in-house. However, the majority of this data is sourced from suppliers so its assessment in house provides a level of independent assurance. In addition, we have engaged independent auditors on several occasions to assess energy and water returns. The Department would wish to see this process continue, whereby departments “self-assure” data prior based on significance, but see later regarding overall independent assurance.
 - The Department recognises that procurement is a key enabler to delivering social, economic and environmental benefits and improvements. The Department’s Sustainable Procurement (SP) Strategy sets out its vision, objectives and high level targets, highlighting stakeholders and governance processes.
 - A mandatory SP Risk Assessment Methodology (SPRAM) tool has been designed for commercial staff to identify any potential social, economic and environmental risks associated with new procurements and existing contracts. It identifies potential impacts, scores them and provides guidance on potential mitigations. The concept being that the best time to incorporate sustainability is at contract specification stage. It also encourages customer discussions on demand management to reduce procurement volumes. The tool is regularly cited as best practice across government. Each category team then builds their own strategy detailing how they will consider sustainability in their individual category.
 - The Department’s Sustainable Procurement Team Implementation Group (SPIG) is attended by SP champions from all category areas, commercial teams and Non Departmental Public Bodies. The group discuss and make decisions relating to new and emerging SP policy, share best practice and raise any issues or barriers to delivering SP. A different supplier is invited to each meeting and awareness and training slots are offered.
 - The Department makes full use of the SP Task Force’s Flexible Framework and is exceeding the current recommended levels (see “Key Achievements”).
 - The Department and its principal suppliers have signed up to the Supplier Charter—a set of principles outlining how the Department and its suppliers will work together to achieve strategic objectives. The Charter has been rolled out to the critical 59 suppliers, but specifically targeting those with the most significant impacts—e.g. IT, travel and estates.
 - As part of the Department’s Policy Through Procurement initiative, performance conditions are used in all new contracts. These ensure that suppliers are operating to at least a minimum standard within six months of contract date, with continuing improvement thereafter. Three SP schedules cover environment, diversity and equality, and apprenticeships and skills, demonstrating the balance necessary to achieve broad sustainability (the Department is seen as a leader on the social aspects).
 - The terms of the DWP estates contract create the incentive for the Department and its estate provider to work together to increase energy and water reduction. Measures to reduce water and energy consumption, in addition to those included in the under the contract, can be funded by the Department and the investment recovered from accrued savings shared between the Department and the estates provider. Examples are:

ENERGY USE AND CARBON EMISSIONS

DWP has reduced energy use and carbon emissions by 23% over the last three years. Energy use and carbon emissions decreased by 11% in 2007–08; 3% in 2008–09; and 9% in 2009–10.

The decrease in 2009–10 took place against the background of an increased demand for DWP services, as a consequence of the economic downturn, which included longer opening hours in Jobcentres, and an increase in the number of staff and IT equipment.

As a result the Department’s reductions over the last three years, per annum, it now saves approximately £8 million and 70,000 tonnes CO₂ through a combination of technical and “housekeeping” measures such as:

- A joint campaign with the DWP estate partner to implement no-cost and low-cost measures, challenge behaviours and encourage buy-in;
- the use of smart meters on largest 600 sites (accounting for 90% of the Department’s total electricity usage), adding gas and water readings where possible, enabling “next-day” rectification of issues and demonstrating campaign results;

- 41,000 national “spend-to-save” measures have been introduced. These are initiatives that require short term investment with long term savings. For example, fridge controllers, infrared sensors on water boilers and waterless urinals. Future plans include automatic lighting controls which will be placed in both external and internal areas and a combined heat and power plant for our largest building. More information on these measures can be found in the DWP Carbon Reduction Delivery Plan.
- an intranet based “Energy Pack”—which contains good practice guidance and reports to inform and encourage DWP staff to be more aware of sustainability issues.
- Following a comprehensive Travel Review in 2007, road mileage has reduced by 20% in the last three years. Most notably, grey fleet usage reduced by 40% (staff’s own vehicles used for Departmental business). CO₂ from road travel fell by 35% (8,000 tonnes) over the same period. This has been achieved by setting limits on daily and annual mileage and through campaigns to encourage alternatives to travel (e.g. video conferencing) and the use of more sustainable forms of travel.

WATER CONSUMPTION

Water consumption has reduced by over a third (400,000m³) in the last four years, through a programme of improved data collection, leak detection, installation of waterless urinals and campaigns with staff.

The terms of the DWP estates contract create the incentive for the Department and its estate provider to work together to increase energy and water reduction. Measures to reduce water and energy consumption, in addition to those included in the under the contract, can be funded by the Department and the investment recovered from accrued savings shared between the Department and the estates provider.

WASTE AND RECYCLING

The amount of waste generated in the Department has fallen by 44% in the last five years, and it consistently recycles 62–66% of waste produced each year. In addition to recycling facilities being provided for staff in all office locations, the Department actively encourages more innovative approaches. One popular scheme was the introduction of the intranet-based “swap shop” where staff nationally advertise and swap surplus or wanted items of office equipment and stationery, thereby reducing waste and procurement costs. In the last three months alone, over 1,000 items have been “swapped”, preventing their entering the waste stream and negating the need for procurement. The value of these items is very conservatively estimated at £23,000.

To what extent are civil servants in your department made accountable for working more “sustainably”?

- DWP’s Planning, Performance and Risk Committee (a sub-committee to the Department’s Executive Team) takes overall ownership of sustainability. In addition to this group, a Sustainable Development Delivery Group comprising representatives from key corporate and business areas is responsible for sharing best practice and ensuring integration of activity in their respective areas. The Sustainable Operations on the Government Estate (SOGE) targets are disaggregated to businesses and local Energy Champions take practical responsibility for reducing energy and carbon across key DWP sites.
- It is also worth noting that the Department’s Permanent Secretary also has sustainability set within his Key Work Objectives. Sustainability has also now been included in the staff competency framework to ensure that everyone understands that they have a key role, which is backed up by comprehensive intranet guidance and information..

What would help the Department for Work and Pensions engage more effectively with the bodies set up by Government to deliver sustainable development targets?

- The Department is working closely with other departments to encourage the introduction of further mandatory measures to ensure consistent appraisal of key sustainability impacts such as carbon, climate change adaptation and social aspects that need consideration within policy development across government.
- The process to assure this consistency is remains unclear and, whilst recent improvements such as the sustainability Specific Impact Test have assisted, governance and policing of appraisals needs to be clarified and tightened to ensure that policy and strategy proposals receive robust analysis. The Department for the Environment, Food and Rural Affairs (DEFRA) has indicated that the value of the natural environment will also need to be evaluated, and that this work is in hand.

- The pan-government governance process for sustainability requires streamlining to ensure integration and consistency. Currently, sustainability policy, operations and procurement, and climate change adaptation are governed through separate programmes chaired and led by different departments (DEFRA, Cabinet Office and Department for Energy and Climate Change). There is no overall strategy which integrates these activities; prioritising them as one single programme and therefore aligning expectations on departments and avoiding duplication and gaps. Ideally, a single overseeing Board should govern the individual strategies and the overall programme, chaired by a single department who would take the overall lead on the programme. This would also streamline reporting structures and minimise duplication, enabling departments to focus on outcomes.
- Work is ongoing across government to identify what can be achieved on social sustainability. This work needs to have a clearer focus and more robust objectives to ensure that social and environmental factors receive equal weighting in the development of policy and strategy across Whitehall

How has the SDC contributed towards improving the sustainability of your Department? How much money has Department for Work and Pensions saved, over what period, by implementing measures recommended by the SDC?

- DWP appreciated the SDC's assistance on the wider aspects of sustainability, particularly in supporting the principle of cross-departmental impact analysis and mitigation. The Department piloted the SDC's Departmental Sustainability Assessment (DSA) during 2009. The DSA gave an independent assessment of the extent to which sustainability was embedded in the Department and what more can be done to facilitate integration. The SDC report is due to be published in early 2011. There would have been value in the SDC continuing this work in other key departments.
- The SDC was also invaluable in providing independent opinion on departmental SD in Government (SDiG) returns. These explain each department's position in relation to SOGE targets and are available online¹⁶. However, there were protracted delays between the data collection and reporting and the SDC assessment which lead to feedback being received from SDC up to two years after it had ceased to be relevant or helpful. Any future independent assurance mechanism needs to be undertaken quickly to have value.
- It is very difficult to attribute savings as solely accruing from SDC recommendations, as savings are made from a combination of the different initiatives in place at any given time.

To what extent does the SDC's Sustainable Development in Government (SDiG) reporting process provide an effective means of monitoring the Department's performance?

- The principle of reporting through the SDiG process is more than adequate to monitor departmental performance. However, the scope of questioning needs to remain static wherever possible to give an accurate year-on-year picture of progress, with departments being given adequate lead in periods for the gathering of new data. The size and scale of departments also needs to receive greater consideration, as each department has its own difficulties in delivering against targets, increasing with that department's scale of operation.
- Performance against the last published Sustainable Operations on the Government Estate targets is available online¹⁷.

How does the Department verify the data it submits on Sustainable Operations on the Government Estate (SOGE) targets? How might the submission and verification procedure be improved under the new SDiG process?

- The Department verifies internally the returns from its estates and business travel suppliers on energy, waste, water, travel etc. Energy has in the past been subjected to an external scrutiny (by Parsons Brinckerhof) to assess system compliance and data accuracy and completeness. In addition, the Department's internal assurance team, Risk and Assurance Division, have undertaken audits of sustainability and operational data/information.
- Currently, SDiG provides a high degree of assurance by identifying performance outside of expectations but there is no third party verification of departmental returns. It is essential that independent audits, perhaps by the National Audit Office, take place on sustainability reports to ensure and demonstrate consistency and robustness of data. There is the opportunity for this to be built into the new SDiG process. However, care will need to be taken to ensure that the added to the length of the reporting process and any attendant increase in costs demonstrates value for money. This could be undertaken through "system audit" of the processes involved in departments and the sampling of actual data, thereby assessing the robustness of the process whilst being relatively light touch. This could allow the assurance to be undertaken quickly (i.e. ongoing assurance of data throughout the reporting year) to maximise its value.

¹⁶ <http://www.sd-commission.org.uk/presslist.php/115/moves-towards-greening-government-already-saving-a60-70-million-every-year>

¹⁷ http://www.sd-commission.org.uk/publications/downloads/2009_Primary_Targets.pdf

- As part of any reporting process it is important to recognise past improvements, as these will always affect an organisation's ability to deliver further savings. Currently, there is insufficient recognition of current position when developing future targets, which could be addressed by comparing performance to best practice benchmarks as well as ongoing targets.

15 October 2010

Written evidence submitted by the Combined Heat and Power Association

SUMMARY

- Government buildings must decarbonise their energy supply in order to meet emissions reductions targets.
- Decarbonising heat supplies should be given parity with electricity.
- Quick Wins should be prioritised.
- The failure to install CHP solutions as a Quick Win is most likely due to:
 - CHP being an unfamiliar technology to estates managers;
 - the lack of available technical information in the Cabinet Office, Defra and BuyingSolutions;
 - the lack of systematic training for estates managers on low carbon energy provision;
 - the lack of procurement frameworks making the process more complicated and expensive.

There are two key areas that will be addressed in this submission: the delivery of energy to public buildings, and the utilisation of Combined Heat and Power (CHP) as a Quick Win.

The policy of Quick Wins has not been successfully embedded within procurement and construction processes. As a specific example, opportunities for CHP on the Government estate have been neglected and targets have not been met. This does not appear to be due to recognition that CHP is a good option for the government estate, rather that the capability to support delivery on the ground is limited.

NB. References in this response to the Cabinet Office reflect the fact that they now have ownership of the Office of Government Commerce, where many of these responsibilities originally lay.

ENERGY

1. Energy consumption has been identified as a priority area in which carbon emissions from the Government estate can be reduced, but there are significant problems with the focus of efforts and the lack of progress. Changes have been made by, for example, selling buildings, improving lighting, and procuring more efficient electrical goods, but these have all been on the demand side; little has been done to address the greater issue of where the government's energy comes from. In order to make emissions reductions on the scale required (and to support the Government's agenda for decentralised energy) estates managers will need to develop onsite low carbon heat and electricity provision.

2. The word energy has also been used interchangeably by the Cabinet Office, Defra and BuyingSolutions with the word electricity. Heat is another form of energy, and one that is responsible for more carbon emissions in buildings than electricity. There is no SOGE target for renewable heat, only electricity, and the SOGE target for CHP only measures electricity provision, despite the fact that the main benefit of a CHP plant is an efficient, low carbon heating supply. Confusing references are made in official documents to "CHP heat" and "renewable energy", targets for which do not exist¹⁸. This is indicative of a lack of understanding of both CHP and energy.

3. Government has fallen short on its renewable electricity SOGE targets and the majority of electricity used is supplied from the grid rather than generated onsite, which raises questions over whether this process encourages renewable generation or if it simply denies it to another consumer—the problem of additionality. Objectives on low carbon energy and decentralisation would be better served by providing energy onsite or locally.

4. A focus on using renewable electricity rather than energy efficiency to reduce carbon emissions has had the perverse effect of limiting options for more cost-effective measures. Much of the Government estate consists of old buildings in urban areas, which are unsuitable for many renewable technologies, yet are ideal for forming the basis of a CHP district heating scheme. This would generate cost and carbon savings in the short term, while the heating infrastructure installed could be used to delivery renewable heat with economies of scale in the future.

5. There is very little advice available to public sector estates/energy managers on how to implement onsite low carbon generation technologies. The Cabinet Office and BuyingSolutions websites and documentation offer little in these areas and the Cabinet Office have suspended their programme of technical "Masterclasses" that provided practical support to estates managers, leaving individual departments to procure training separately, at greater cost, if at all.

¹⁸ E.g. Energy Efficiency Measures in the Government Civil Estate, OGC 2009.

COMBINED HEAT AND POWER

6. CHP is ideally suited to many buildings in the public estate. There is often little that can be done to improve the fabric of the building (lack of cavity walls for insulation, or listed status preventing external cladding or solar panels) and their urban location limits the possibilities for technologies such as wind or hydro power. The NHS Sustainable Development Unit has identified that in hospitals for example, there is a typical payback for CHP of just 2.8 years¹⁹ and Trusts such as St Thomas' and Guy's are saving around £1.5 million per year on their energy bills. Indeed, the SDU have identified a negative marginal abatement cost for CHP, meaning that switching to low carbon heat/electricity through CHP saves you money as opposed to being more expensive, as is the case with other technologies.

7. CHP has been identified as a "Quick Win" (now "Government Buying Standards") by both the Office of Government Commerce (OGC) and the EU sustainable procurement programme, Green Public Procurement (GPP). In addition to its obvious meaning, Quick Wins are mandatory minimum standards for products that should be implemented as part of the EU Energy Services Directive. The standard for CHP is "Good Quality" CHP (GQCHP), which was created to fulfil UK obligations for the CHP Directive and translates to a primary energy saving of at least 10% over business as usual. Despite these policies, there has been very little progress in the uptake of CHP on the public estate.

8. The government had a SOGE target to procure 15% of its electricity requirements from CHP by March 2010. According to the SDC in 2009, a figure of only 8.7% was reached, with no improvement on the previous year²⁰. As mentioned above, the majority of this capacity is procured from off site, and over 90% is used by just three departments. In addition, only 6% of the CHP electricity that was used meets the GQCHP standard. Analysis of UK policies for complying with the Energy Services Directive commissioned by DEFRA in 2007 stated that they would not realise any of the potential for CHP²¹.

9. The failure to embed Quick Wins in procurement has been raised by the SDC, the National Audit Office²² and the Environmental Audit Committee. In its response to the 6th report of the Environmental Audit Committee's Inquiry, *Greening Government*, the government suggested that its failure to improve the uptake of Quick Wins would be remedied through the creation of a Centre for Expertise in Sustainable Procurement within OGC, but the figures above demonstrate that this has not been the case. The government has provided no response to recommendations on CHP put forward by the SDC in their annual progress reports²³.

10. The gap between political support for CHP and delivery on the ground highlights an important issue with the Government's ability to meet its objectives for the estate—estates managers are rarely experts on energy. Energy is a complex field and low carbon energy is new and rapidly changing, so extensive support must be provided in order for them to make informed choices when replacing their existing supply. For the Government to embed sustainability in a systematic fashion, resources must be made available to simplify the process for estates managers. As an example, there is currently no basic information on what CHP is or how to procure it in Cabinet Office documents relating to sustainable procurement, sustainable construction or sustainable energy²⁴. The technical "Masterclasses" mentioned above could have filled this gap, but they were not mandatory and the programme has been cancelled.

11. The lack of energy expertise within estates management could be compensated for by the creation of procurement frameworks for the relevant technologies. This would reduce the risk involved in procurement by having approved suppliers providing pre-agreed results. They would also serve to eliminate waste by reducing the time and cost involved in procurement.

DISTRICT HEATING

12. In the Household Energy Management Strategy²⁵ published earlier this year, Government acknowledged the important role that public buildings play in providing "anchor loads" for district heating (DH) schemes, and made a commitment to consider connecting buildings to DH schemes where feasible. By fulfilling this pledge, the Government would be in a position to decarbonise its own heat supplies and those of the wider community. The aggregating of heat demands allows for economies of scale for any heating technology, as well as enabling the possibility of more efficient solutions such as CHP.

13. This concept however, has not reached other departments such as the Cabinet Office. DH schemes are understandably more complex than individual heating systems, so in order for estates managers to be able to consider it as an option, guidance and support must be provided.

¹⁹ NHS Carbon Reduction Strategy for England, NHS Sustainable Development Unit, 2009.

²⁰ Sustainable Development in Government, Sustainable Development Commission, 2009.

²¹ Options for Implementing Article 5 of the Energy Saving Directive, BRE, 2007.

²² Sustainable Procurement in Central Government, NAO, 2005.

²³ Government Response to the Sustainable Development Commission, Cabinet Office, Defra, OGC, 2008.

²⁴ E.g. Guidance to Sustainable Operations on the Government Estate, OGC, 2008; Considering Energy Efficiency in Procurement, OGC 2009; Priority Actions for Improving Energy Efficiency across the Government Estate, 2010.

²⁵ Household Energy Management Strategy, DECC, 2010

RECOMMENDATIONS

- Establish a “one-stop shop” for low carbon energy solutions on the Cabinet Office website. There should be links to relevant technical, commercial and procurement information for each technology. Quick Wins should be clearly highlighted.
- Provide systematic training for estates managers on low carbon energy provision. The most obvious method for this is to restart the Cabinet Office’s programme of technical “Masterclasses” and to make their attendance mandatory.
- Develop procurement frameworks for low carbon energy technologies to simplify the process, reduce costs, reduce risk and eliminate waste.
- Bring decarbonising heat and cooling into parity with decarbonising electricity as a priority for the estate in the replacement to the SOGE framework.

13 October 2010

Written evidence submitted by the Aldersgate Group

INTRODUCTION

1. The Aldersgate Group (AG) is a coalition of businesses, NGOs, professional bodies, MPs and others that provide leadership on vital sustainability issues. We promote the case that strong environmental policies are essential for economic competitiveness and seek to be a catalyst for fast and effective change. The AG engages actively with key decision makers in government, business and civil society to contribute to the future development of UK economic and environmental policies.

2. Please note that the views expressed in this document can only be attributed to the AG and not to individual members.

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

3. Sustainability is a major challenge to both strategic and operational management of all organisations including Government. It requires new thinking, innovation and integration. Any overhaul of the mechanisms for ensuring that Government procurement and policy-making accelerates the transition to sustainability will need to address the significance of this challenge.

4. The Aldersgate Group believes that addressing the long-term environmental challenges of climate change, energy security and resource depletion are just as critical for our wellbeing as the Government’s response to the global recession and reducing the budget deficit. Mainstreaming sustainability will require several changes in Government processes.

5. Mechanisms will need to be far more effective at challenging existing conventions and assumptions and in order to do so will need to stimulate timely input of new and different perspectives from both inside and outside Government.

6. Prices must reflect environmental realities. While it is invariably complex to price environmental externalities (by which we mean environmental changes that impact human welfare and the biosphere but are not reflected in markets), current prices are a long way off providing a sufficient incentive for investments at the pace and scale required to meet environmental challenges. The Aldersgate Groups believes that the current carbon price is not sufficiently stable, high or credible to stimulate the required investment in low carbon technologies. Conventional mechanisms based on cost benefit analysis do not effectively address the uncertainty, irreversibility and thresholds in environmental wealth implicit in climate change. The non-market price for carbon should be used in the assessment of procurement decisions.

7. The Government must also ensure that all policy and procurement mechanisms within Government are far more tightly geared to UK carbon budgets. For example, in particular, it would make the reality of environmental limits have traction with decision makers and it would encourage—even demand—policy integration to ensure that the collectively government investment and public policy decisions did not breach the budget.

8. The scale and speed of the required transition to a low-carbon resource efficient economy will require mechanisms that accelerate and maximise the economic opportunities for the UK. As resource efficiency and related innovation increasingly become primary benchmarks of a successful economy, the UK will need to address critical resource constraints and ensure long-term competitive advantage. This will require that the mechanisms to mainstream sustainability in government facilitate this integrated approach. For example, the UK’s £175 billion public procurement budget is a massively underused lever for progression towards a low carbon, resource efficient economy.

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

9. The SDC has made valuable contribution to advancing sustainability across government. Its independence has allowed it to provide advice to Government that has drawn on a wide variety of relevant perspectives and disciplines and that is not constrained by political pressures or existing conventions. Its recent work on a Sustainable New Deal and delivering neighbourhood sustainability retrofitting are good examples of this.

10. The SDC has also played a significant role in the growing debate over whether there is a need to rethink the conventional approach to growth as sustainability asks important questions about the assumptions made by that approach and its ability to deliver sustainable development. The Aldersgate Group, in line with other business based organisations such as the World Economic Forum, believes it is important for this debate to be had in public and whilst not endorsing its findings recognises the important contribution to the debate made by SDC's publication *Prosperity Without Growth*.

In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (eg to develop "sustainability reporting" in departments' accounts) and the contributions that other bodies might make (eg Centre of Expertise in Sustainable Procurement)?

11. Wide-ranging environmental challenges cannot be effectively addressed through segmented government. Departmental carbon budgets are welcome and should be monitored by the Climate Change Committee. The Treasury should assume a greater leadership role, expanding the scope of its carbon budgets and making the design of environmental regulation a key objective in the management of the economy. A resource productivity drive must also be supported across government departments.

How, without the assistance of the SDC, will the Government be able to demonstrate that it is "the greenest government ever"?

12. The Government needs to ensure its decisions are well informed and take longer term environmental, economic and social consequences fully into account. New arrangements must include activities to improve policy innovation and long term performance. To achieve this, the sustainable development agenda needs to be the responsibility of a senior minister with a cross-government remit and supported by a dedicated policy team.

13. The Aldersgate Group published a report entitled *Accelerating the Transition* just before the General Election that sets out eight priorities for the first 100 days of the new Government to ensure an effective transition to a low carbon and resource efficient economy. These have been slightly modified so as to act as a benchmark for the "greenest government ever".

(1) Ensure that prices reflect environmental realities. In particular, the UK should work with its European partners to tighten the EU ETS cap, principally by increasing the EU's overall emissions reduction target for 2020 from 20% to 30%. This must be leveraged to the maximum possible effect to incentivise other nations to increase their own emission targets in the ongoing international negotiations for a new UN climate change treaty. Further EU ETS reform should aim to tighten limits on the use of carbon offsets credits²⁶, introduce the auctioning of permits at a faster pace²⁷ and introduce an auction reserve price²⁸. As these measures will require pan-European agreement when there is currently little political appetite for reform, a contingency policy must be action to underpin the domestic carbon price by creating a price floor at a sufficiently credible and effective level.

(2) Don't rely on pricing alone. Although important, pricing remains a blunt instrument. Government should aim both to reduce the UK's carbon intensity and to help UK business become a world leader in resource efficient products and services. Well designed and effective regulation is necessary for both these objectives. A comprehensive domestic energy efficiency plan is vital for a cost effective transition to a low carbon economy and the Government's Green Deal needs to be rolled out widely, quickly and effectively.

(3) Simplify the regulatory framework. Too often, environmental policy has been an ad hoc response to an isolated challenge. This is rarely effective and often creates unintended consequences elsewhere. The Government should rationalise the large number of complex environmental regulations (and regulatory bodies) that are creating unnecessary administrative burdens and ensure a more uniform (and effective) carbon price across all regulations.

(4) Create an ambitious Green Investment Bank. Following the publication of the report by the Green Investment Bank Commission, it is essential that the Government builds on this bold vision by swiftly putting forward credible proposals for a strong, powerful and effective institution. The AG has published a joint

²⁶ Carbon offsets incentivise cheaper emission reductions through investments in projects outside of the EU ETS. However, they generally lower the carbon price and can reduce potential benefits for the domestic economy.

²⁷ A recent Carbon Trust study finds that low carbon manufacturing would be severely weakened if all sectors currently deemed at risk of carbon leakage by the European Commission received free allocation of permits. See Carbon Trust (March 2010) *Tackling carbon leakage: Sector-specific solutions for a world of unequal carbon prices*.

²⁸ Alternatively, a floor price could be underwritten by revenues generated through the auctioning of permits.

statement with Transform UK that sets out recommendations that the Green Investment Bank should address. This must include sufficient capitalisation of at least £4–6 billion for the first four years.

(5) Stimulate low carbon industry. The Government must have a credible strategy for removing market barriers and ensuring the UK is a world leader in the development of environmental goods and services. This must include a sufficient framework to accelerate growth, jobs and innovation in targeted sectors, as well as skills development [both high level STEM (Science, Technology, Engineering and Maths) skills and the generic “green skills” increasingly required of all employees to support the move to green, low carbon workplaces].

(6) Improve accountability across government. Wide-ranging environmental challenges cannot be effectively addressed through segmented government. Departmental carbon budgets are welcome and should be monitored by the Climate Change Committee. The Treasury should assume a greater leadership role, expanding the scope of its carbon budgets and making the design of environmental regulation a key objective in the management of the economy. A resource productivity drive must also be supported across all government departments.

(7) Incorporate a lifecycle approach. Effective management of resources necessitates a consideration of the whole resource cycle. UK waste policy must move away from a linear model and look towards “closing the loop”. In particular, the Government should encourage the use of recycled materials in UK manufacturing and construction, either via green procurement in the public sector or by a voluntary code in the private sector leading to competitive advantage. The AG supports the Government’s drive to implement immediate carbon reductions across the government estate that seeks to outperform carbon budgets and should also focus on how public procurement could be improved to contribute to the achievement of sustainability objectives.

(8) Plan a just transition. The radical decarbonisation of the economy has the potential to be a major source of wealth and employment. It will also involve massive and complex changes that will create losers as well as winners. The role of the Forum for a Just Transition should be expanded, so that it reviews the social impact of carbon budgets and has a formal advisory role to the Green Investment Bank.

18 October 2010

Written evidence submitted by the Department for Education

SUMMARY

- The scope of SDiG reporting is limited to operation of the estate and does not give a comprehensive assessment of the department’s contribution to sustainable development.
- The most effective levers for action have been:
 - capacity building in the department through embedding SDC advisers to work with policy teams;
 - leadership from the Permanent Secretary who has an objective on sustainable development in his job plan;
 - the requirement for annual reporting on progress to the SDC against the SDAP; and,
 - comprehensive delivery plans underpinning the SDAP monitored by a programme board.
- For a small department with a large public sector, the influence the department can have on the sector has more impact on reducing carbon emissions and improving UK sustainability than the operation of a small part of the government estate.
- Going forward, sustainable development targets should be relevant to Departmental aims and objectives and reflect both estate and influence on the public sector.
- Reporting should be embedded within overarching structures rather than additional, for example in the structures for departments’ annual performance reporting.

GENERAL OBSERVATIONS ON THE COMMITTEE’S THEMES FOR THE INQUIRY

The mechanisms that have been used to ensure the sustainability of Government operations, procurement and policy making are based on formulaic reporting—on Sustainable Operation of the Government Estate (SOGE) targets, including against the Sustainable Procurement Flexible Framework, and in departmental Sustainable Development Action Plans, where SDC assessment has been something of a tick box exercise. The processes have not allowed for departments’ differences in maturity of understanding of sustainability and its embedding in departmental thinking. Indeed, having a separate SDAP, instead of sustainability being part of normal planning and monitoring processes, positions sustainable development as an add-on to everyday good practice. This centrally driven phase may have been necessary to raise awareness across Government departments, but should now evolve to reflect the different priorities and potential impact of each department in each of operations, procurement and policy. For example, a small department with a large public sector can have more impact on sustainable development (and UK carbon emissions) through influencing others than it can by even the most sustainable possible operation of its estate (although we do recognise the presentational importance of the latter).

A simple development of the current system would be to require departments to set sustainability priorities and report against them annually demonstrating progress. Alongside this should be explicit sustainability accounting as part of financial reporting, not only on the information currently covered by SOGE, but also the department's assessment of its contribution to reducing carbon emissions against its carbon budget. This would be in line with the Coalition's aim for transparency in public affairs and ensure that all data published by public bodies is published in an open and standardised format, so that it can be used easily and with minimal cost by third parties.

The purpose of being "the greenest government ever" must be to leave a fair and equitable legacy to future generations. This means we must value the natural environment in relation to its contribution to society. This is not only the resources the environment provides (both finite and renewable) that meet our day to day physical needs, but also the impact on the health and wellbeing of individuals from exposure to the natural environment. There is a wealth of evidence on the latter (including the SDC publication *Every Child's Future Matters*), but work would need to be done on how we could measure improvement.

SPECIFIC RESPONSES ON THE COMMITTEE'S QUESTIONS

What procedures specifically initiated in the department have been most successful in improving sustainable development in your department? Why have these worked well? Which procedures have not worked and why?

The department has had a close relationship with the SDC since 2005 (governed by a memorandum of understanding). Advisers from the SDC have worked alongside staff to build capacity and understanding of sustainable development, how our policies can help to underpin sustainable development and also be enhanced by taking a sustainable approach. The arrangement has been successful, for example the development of the internationally regarded sustainable schools work. The relationship has evolved over time to require less input from SDC as sustainability has become better embedded in the department's work. The input from SDC has reduced over the last 18 months and was planned to end this year.

Without a clear mandate in the form of commitments from each Directorate (published in our SDAP), the SDC advisers and the Sustainable Development team in the department struggled to get traction with colleagues. From the second SDAP (2006–08), the commitments and the knowledge that the department had to report on them to the SDC watchdog team, provided a lever for action. Setting up a Sustainable Development Programme Board and a series of Directorate delivery plans alongside SDAP 2008–10, strengthened that further. However, the additional bureaucracy of this structure becomes counterproductive over time, and the more sustainable development is embedded in the department's thinking, then the more integrated it should be in normal departmental processes. Going forward, we think that sustainable development should be reported in the departmental annual report.

Operationally, SOGE targets and ISO14001 have worked well at embedding sustainable development in to the work of Estates and Facilities management. The targets have acted as a catalyst for action and led the estates staff to a more thorough examination of the environmental impacts of operations and have facilitated project works aimed at minimising these impacts. ISO14001, although continually developing, has formalised the reporting, monitoring and auditing of EFM activities from an environmental perspective.

The fact that Permanent Secretaries have been expected to have a sustainable development objective in their personal job plans has been very influential—raising the profile of sustainable development with senior managers. This has given the Sustainable Development Unit in the department authority to challenge colleagues on how sustainable development is an outcome of the delivery of their policies. We have monitored this through delivery plans which underpinned the SDAP, reporting to a departmental Sustainable Development Programme Board chaired by the Director General for Finance and Corporate Services, and including external members from SDC, OGC and PFS.

To what extent are civil servants in your department made accountable for working more "sustainably"?

All operations and procurement staff are expected to have sustainable development objectives in their job plans and this improved from 80% to 100% between 2009 and 2010. Some members of policy teams, where relevant, also have sustainable development objectives. In the last two rounds of the staff survey, staff have been asked to rate the statement "I know how to incorporate sustainable development into my work". This improved from 44% to 56% positive rating between 2009 and 2010.

Progress on the Sustainable Procurement Flexible Framework is included in the annual SOGE performance report and this includes reporting progress on leadership, staff competence and awareness of sustainable procurement. The Department has achieved level 4 (from 5 levels) for this area by December 2009 in advance of the December 2010 target to be at level 3.

The department is working to improve the quality of policy making with training for staff and a "Making Policy" site with advice and support for policy development and impact assessment. Sustainable development and sustainable procurement are integral parts of this.

3. What would help Department for Education engage more effectively with the bodies set up by Government to deliver sustainable development targets?

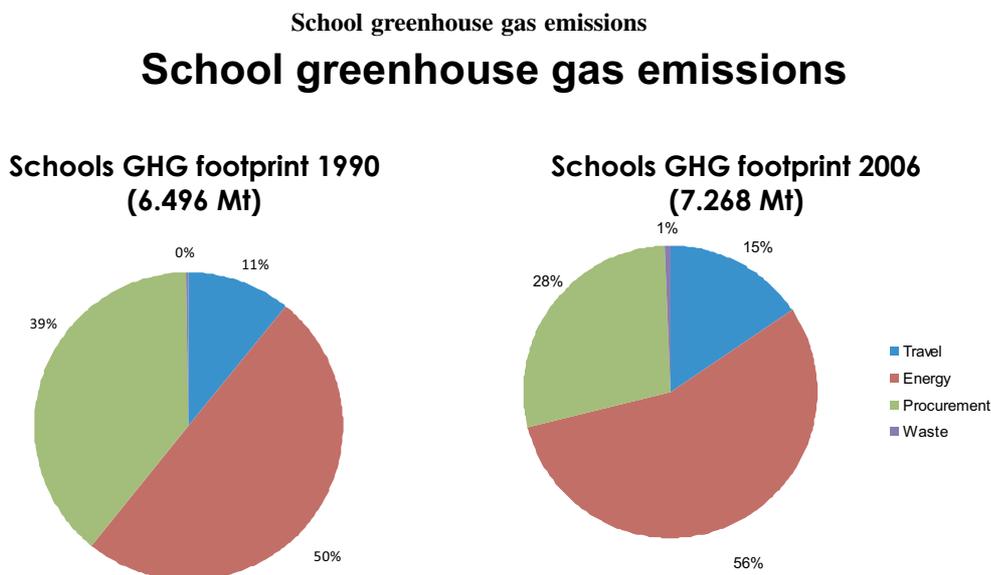
Liaison with OGDs has been very effectively managed both by SDC and by OGC/CESP, but it is not helpful to have to report on overlapping ranges of operational data on different returns. We suggest that ePims, or an upgrade of it, could be developed into a single portal for operations data.

Imposing generic targets for the operation of the estate, applied to all departments, does not reflect starting positions or local circumstances. For example, the target to achieve 10% CHP across the estate is not the most sustainable energy option for any of our four headquarters buildings and targets need to be sufficiently flexible to reflect this. In addition, the impact of this department on the wider public sector has the potential to deliver far more in terms of sustainable development. Targets should relate to departmental objectives in addition to requiring ongoing improvement in sustainable operations.

4. How has the Sustainable Development Commission (SDC) contributed towards improving the sustainability of your department? How much money has Department for Education saved, over what period, by implementing measures recommended by the SDC?

This is a complex issue. We have taken advice from more sources than the SDC, and often on the advice of SDC (e.g. to have Carbon Trust undertake an energy audit) so to separate out which actions were triggered by SDC advice would be contrived. In total on sustainable operations, we have spent £910,000, over 2008–2010, on invest to save measures with an expected payback period of 3–4 years. We have approximately £330,000 savings to date and should realise a saving of 2,698 tonnes of CO₂ per annum.

Of greater impact, but difficult to measure, are the savings from influencing action in the school sector by publishing information on the sources of carbon emissions in the sector. The most recent update of this joint four year project with SDC was published in March and included the following pie charts:



GHG footprint is defined as the total set of GHG emissions caused directly or indirectly by an individual, organisation, event or product. Total GHG emissions are expressed as CO₂e

The publication also recommended actions that should be taken at school, local authority and national level. Along with the information that the school sector is responsible for 15% of public sector emissions, we know from the reaction of audiences of heads, school business managers and local authority staff that these pie charts really bring home the message that schools should be taking action to reduce their impact on the environment.

In addition, the SDC have undertaken work relating to the department’s policy development, for example in the publication of *Every Child’s Future Matters* and most recently *Improving Young People’s Lives: How the environment builds their resilience, responsibility and employment chances*.

6. To what extent does the SDC’s Sustainable Development in Government (SDiG) reporting process provide an effective means of monitoring the Department’s performance?

It’s an important example of public accountability, but it is limited in scope to operation of the estate (see comments in General observations above).

7. How does the Department verify the data it submits on Sustainable Operations on the Government Estate (SOG) targets? How might the submission and verification procedure be improved under the new SDiG process?

Utilities consumption, waste creation and recycling are verified through the contracts in place for provision of these services. For waste these contracts have legal obligations and are regularly audited under ISO14001. With regards to utilities consumption, all sites are extensively metered and this data is interrogated on site and used to corroborate the invoices received by suppliers thus also ensuring accurate financial accounting.

Travel mileage for air and rail travel is provided and verified through the travel contract in place. Private vehicle mileage travel figures are calculated from analysing internal financial management information. The department no longer has fleet or pool cars.

Energy management has been examined by the Carbon Trust and endorsed as adopting the CT carbon management programme. Estates and Facilities Management have managed carbon practices through the EMS environmental impacts and supporting action plans audited for ISO14001 certification.

The Department's sustainable procurement performance is improved through the Flexible Framework and actions confirmed for progress against each element. Compliance with Government Buying Standards has been mandated and any move away from the standards requires a robust business case before purchase. Regular compliance checks are conducted and an exercise to scrutinise indicated that all purchases follow the standards.

To improve the submission and verification procedure under the new SDiG process, the electronic data capture needs to be extended and streamlined. The current ePIMs process is used for estates reporting and SOGE forward planning but is creaking under the demands being made of it. In addition it does not collect information covering the whole range of sustainable development activity.

18 October 2010

Written evidence submitted by the Campaign to Protect Rural England

INTRODUCTION

1. We welcome the opportunity to submit evidence to the Environmental Audit Committee on the need to embed sustainable development across Government. As a leading environmental charity, the Campaign to Protect Rural England (CPRE) has worked to promote and protect the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources since 1926. In order to achieve our aims and for the Government to be the "greenest Government ever" we recognise the need for cross-governmental support for environmental issues, including sustainable development.

2. CPRE does not have detailed comments on the specific themes identified by the Committee. We hope that this general submission on the issue will, however, still be of interest to Committee members.

EXECUTIVE SUMMARY

3. In making recommendations to the Government about the need to embed sustainable development across Government CPRE proposes that the Committee considers the following key points:

- The land use planning system is a key tool for achieving sustainable development. If the Government is to achieve its goal of being the "greenest Government ever" its proposed planning reforms, including the commitments to create a "presumption in favour of sustainable development" and a national planning framework, will need to ensure that environmental, social and economic issues are effectively integrated as part of the decision-making process.
- Proposals for Local Enterprise Partnerships are currently skewed towards securing economic growth, without sufficient consideration of environmental and social impacts. This suggests that more needs to be done to ensure that sustainable development is central to the work of all Government departments.

CROSS GOVERNMENT SUPPORT

4. Following the Government's decision to withdraw funding for the Sustainable Development Commission it will be more important than ever that sustainable development runs through the priorities of all Government departments. The press release, issued on 22 July 2010, announcing the withdrawal of funding quotes the Rt Hon Caroline Spelman as saying "times have changed since many of these bodies were set up and much of what they do is now everyday Government business". We agree that sustainable development should be everyday business, but we are concerned that this is not reflected in recent Government announcements.

5. We are pleased that the Department for Environment, Food and Rural Affairs is preparing a Natural Environment White Paper and the principles of sustainable development should clearly underpin this work. It is interesting to note, however, that the last environment White Paper, *This Common Inheritance*, was presented to Parliament in 1990 by the Secretaries of State for Environment, Trade and Industry, Health, Education and Science, Transport, Energy, Employment, Scotland, Wales and Northern Ireland, and the Minister of

Agriculture, Fisheries and Food. CPRE believes that there needs to be similar support from across Government for the new Natural Environment White Paper and the proposed planning reforms, both of which we see as central to achieving sustainable development.

THE ROLE OF THE PLANNING SYSTEM IN ACHIEVING SUSTAINABLE DEVELOPMENT

6. CPRE believes that the land use planning system is a vital tool for environmental protection. Its role is to integrate environmental, social and economic factors and mediate between local and national interests to facilitate development in the wider public interest. The planning system should not be concerned solely with delivering economic growth, with insufficient consideration being given to the longer term environmental or social impacts.

Presumption in favour of sustainable development

7. We recognise that Coalition Programme committed the Government to creating a “presumption in favour of sustainable development in the planning system”. This commitment is contained within the Environment, Food and Rural Affairs section of the document, while the wider planning reforms are set out under the Communities and Local Government section. We welcome the implication that the two departments will work together to take this commitment forward.

8. There is a need for clarification, however, as to how this proposed presumption in favour of sustainable development will work in practice. The Conservative Party’s *Open Source Planning Green Paper* (February 2010) sets out more detail on the proposed presumption stating that it will “give the planning system an inbuilt bias towards the creation of appropriate new houses, offices, schools, shops and other development”. Without greater clarity about what might be a workable definition of sustainable development, there is a danger that if a local plan does not explicitly rule it out then development will be allowed to proceed regardless of the wider consequences.

9. While CPRE supports placing more emphasis on local plans we are concerned that on the same page of the Green Paper it states that the Conservative’s “believe that the country needs to see a major upswing in development and construction as soon as possible, and [they] will enact policies to make it happen”. It is increasingly clear that areas in the South East and East of England have already surpassed environmental limits in relation to water resources, an “upswing” in development in those areas is unlikely to be considered sustainable.

National planning framework

10. The Government has also committed to developing a “simple and consolidated national planning framework covering all forms of development and setting out national economic, environmental and social priorities”. This will set a framework within which local authorities will work with communities to develop local plan policies. While we recognise that the Government will not want the framework to be overly prescriptive, this is an important opportunity to embed the principles of sustainable development within the planning system. As part of this, CPRE would like to see the inclusion of policies setting out the need for land to be used efficiently, including giving priority to urban regeneration and the protection of productive soil and valuable farmland. It should also include setting out a sequential, “brownfield first” approach for all kinds of development.

Local Enterprise Partnerships

11. Finally, CPRE believes the Committee should consider the role of the emerging Local Enterprise Partnerships (LEPs) in relation to sustainable development. The letter from the Secretaries of State for Business, Innovation and Skills and Communities and Local Government, dated 29 June, suggests that the Partnerships could replace existing Regional Development Agencies and provide strategic leadership on economic growth within their area. We understand that by the 6 September the Government had received 56 proposals for Partnerships and these are currently being considered.

12. The letter goes on to state that in order to “create the right environment for business and growth in their areas” Partnership’s may tackle issues “such as planning and housing, local transport and infrastructure priorities, employment and enterprise and the transition to the low carbon economy.” While CPRE welcomed the revocation of the top-down housing targets within the Regional Spatial Strategies, we believe there is a continuing need for some form of strategic planning which embraces the need to promote sustainable development. It is clear that the Government believes that LEPs should undertake a strategic role in future. We are concerned, therefore, that their overriding focus is economic growth.

13. We recognise that the Government’s primary aim is to reduce the economic deficit and that economic development will be an important goal for strategic planning. Environmental and social factors should, however, also be taken into account to ensure that the overall approach is sustainable, protects the environment and

delivers a better quality of life for communities. If we are to succeed in embedding sustainable development across Government, this is a clearly an area of policy that will need to be reconsidered.

18 October 2010

Written evidence submitted by South West Learning for Sustainability Coalition

EMBEDDING SUSTAINABLE DEVELOPMENT ACROSS GOVERNMENT

The South West Learning for Sustainability Coalition is a Community Interest Company that links a network of 100 organisations and individuals who see learning as essential to the development of a sustainable South West. We work across all sectors to ensure that education for sustainable development (ESD) initiatives contribute to a coherent framework of activity that reflects educational values, as well as sustainability concerns.

The three principal roles of the Coalition are:

- (i) to share ideas and experience in education for sustainable development (ESD) across the region and with other regions;
- (ii) to give the ESD movement a “voice” and sense of solidarity;
- (iii) to work with others to ensure that ESD initiatives and services contribute to a coherent framework of provision across the region.

Since 2004 the Coalition has grown through the voluntary efforts of members and supportive institutions. With modest funding we have established a schools’ networking website called *Linking for a Change* (www.linkingforachange.org.uk) provided practical training for school leaders and run a number of successful regional events.

SUSTAINABLE DEVELOPMENT AND LEARNING

We believe that learning is integral to sustainable development, indeed sustainable development doesn’t just depend on learning, it is inherently a learning process.

We do not propose that learning across Government would, on its own, bring about sustainable development but we suggest that it would provide evidence that sustainable development was happening.

Effective learning relies on reflection as well as practice and the presence of a critical partner organisation, such as the Sustainable Development Commission (SDC), helps to ensure that such reflection is taking place. We are therefore concerned that the withdrawal of funding from the SDC will reduce drastically the Government’s capacity to learn its way forward towards its goal of being the “greenest Government ever”.

In providing brief responses to the specific themes of the EAC’s inquiry, we have restricted our comments to the issue of *learning* for sustainability and to the contribution that the SDC has made to the field of education for sustainable development.

EAC Question: How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

While clear leadership will be required, such as that promised by Defra, it is critical that responsibilities are devolved across and within Government departments so that as many people as possible are called upon to engage with and learn from decision-making in relation to sustainable development.

Each Department needs clear rights and responsibilities in relation to sustainable development; at the very least they should be allowed to retain and further develop their own sustainable development policies and departmental action plans with Defra (or better still, an independent body) providing oversight of these.

EAC Question: How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

Learning will inevitably involve making mistakes, which will in turn provide valuable lessons. It is important that the “critical friendship” of the SDC is not replaced with a didactic approach or worse still a “blame culture”. For this reason, we strongly recommend that an independent body (or group of organisations) provides some external oversight.

EAC Question: Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

In terms of education, the SDC provided a valuable cross-sector, cross-phase overview that no single Government department appears well-positioned to replace.

More specifically, the publication of Every Child’s Future Matters applied a valuable sustainability perspective to the Government’s flagship education policy. If Every Child Matters does not remain central to

Government thinking on education, then an updated review (from a sustainability perspective) of any new policy direction will be required. In the absence of the SDC, it is not clear who might be asked to provide this; we suggest such a task could be offered nationally through a transparent tendering process.

One piece of unfinished business: the SDC initiated the search for a national indicator for education for sustainable development on behalf of the Government (Defra); this process needs revisiting. We would suggest that the Sustainable Development Unit within the Department of Education take the lead on this.

EAC Question: In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (e.g. to develop “sustainability reporting” in departments’ accounts) and the contributions that other bodies might make (e.g. Centre of Expertise in Sustainable Procurement)?

The Government should be open to learning from examples of good practice wherever these can be found, e.g. the sustainable procurement policy of Rutgers University, New Jersey, USA: http://greenpurchasing.rutgers.edu/Images/Rutgers_Green_Purchasing_Policy.pdf

EAC Question: How, without the assistance of the SDC, will the Government be able to demonstrate that it is “the greenest government ever”?

The Government may not like or want comments from external bodies but we suggest it *needs* external scrutiny and comment in order to demonstrate progress towards sustainable development. Again, we strongly recommend that an independent body (or group of organisations) provides both external oversight and critical friendship to ensure that the Government achieves its vision of becoming the “greenest Government ever”.

Thank you.

20 October 2010

Written evidence submitted by the Welsh Assembly Government

SUMMARY

- The Welsh Assembly Government is underpinned by a legal duty relating to sustainable development, contained in section 79 of the Government of Wales Act 2006 [GoWA 2006];
- Sustainable development is the central organising principle of the Welsh Assembly Government;
- The Welsh Assembly Government has a clear governance structure and a number of mechanisms to embed sustainable development across its policies and programmes;
- There is a robust and comprehensive reporting process in relation to the Welsh Assembly Government’s sustainable development performance, which includes scrutiny by the National Assembly for Wales and commentary by independent stakeholders; and
- In light of the UK Government announcement concerning the future of the Sustainable Development Commission, the Welsh Ministers will develop new arrangements in Wales to provide appropriate advice, as well as catalyse and support action to deliver sustainable development in all parts of society across Wales.

INTRODUCTION

1. The Welsh Assembly Government has a duty under section 79 of the Government of Wales Act 2006 to have a scheme setting out how it will promote sustainable development in the exercise of its functions. The duty also requires Welsh Ministers to:

- publish an annual report of how the proposals set out in the Sustainable Development Scheme have been implemented in that financial year; and
- following an election to the National Assembly, publish a report containing an assessment of how effective the proposals set out in the scheme have been in promoting sustainable development.

2. This paper describes how the Welsh Assembly Government has met its legal duty to implement a Sustainable Development Scheme. Going further, this paper also describes how we are embedding sustainable development as the central organising principle of the Welsh Assembly Government.

BACKGROUND

3. I launched the new Sustainable Development Scheme *One Wales: One Planet* in May 2009. This scheme defines sustainable development as enhancing the economic, social and environmental wellbeing of people and communities, achieving a better quality of life for our own and future generations in ways which:

- promote social justice and equality of opportunity; and
- enhance the natural and cultural environment and respect its limits—using only our fair share of the earth’s resources and sustaining our cultural legacy.

4. The new Sustainable Development Scheme:

- affirms that sustainable development will be the central organising principle of the Welsh Assembly Government and sets out the steps we will take to fully embed this approach;
- confirms that sustainable development is the overarching strategic aim of all of our policies and programmes, across all Ministerial portfolios;
- sets out our vision of a sustainable Wales, based on using only our fair share of the earth's resources and becoming a fairer and more just nation; and
- is structured according to our five headline indicators of sustainable development, to provide a firmer link between our scheme and how we report progress against sustainable development.

5. We have more closely defined the meaning of sustainable development in terms of the central organising principle of policy making and delivery. The key characteristics that we have identified are:

- *clarity about what is valued and our objectives*—with a focus on maximisation of the economic, social and environmental wellbeing of Welsh citizens over the long term;
- *informing real hard choices in policy and investment*—for example through focusing on prevention / early intervention, dealing effectively with failure and promoting policy integration across Departments; and
- *securing a sufficiently broad and deep mandate for our approach*—through building trust and confidence and promoting behaviour and culture change at all levels in society.

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

6. The Welsh Assembly Government's duty in relation to sustainable development gives us a unique understanding of the challenge in embedding sustainable development across policies, programmes and projects in Government.

7. In over a decade of having a sustainable development duty in Wales, we have refined our thinking as to how to meet this challenge. Our solution, which we have set out in *One Wales: One Planet*, is that the long term wellbeing of people, communities and place must be the basis for making every decision at the Welsh Assembly Government. That is what we mean by making sustainable development our central organising principle.

8. Below I have briefly described some of the mechanisms we have in place within the Welsh Assembly Government to achieve our goal of making sustainable development our central organising principle.

WORKING TO BE AN EXEMPLAR

9. In our scheme, we confirmed our vision that the Welsh Assembly Government would become an exemplar organisation in the way that it mainstreams sustainable development as the central organising principle. The key outcomes from this we are working towards are:

- the Welsh Assembly Government, as an exemplar organisation, demonstrates leadership on sustainable development, and encourages and enables others to embrace sustainable development as their central organising principle;
- sustainable development considerations are at the core of the evaluation and development of our policies and our new and existing investment proposals; and
- there are effective and participative systems of governance in all levels of society.

CABINET SUB-COMMITTEE ON SUSTAINABLE FUTURES

10. I Chair a Cabinet Sub-Committee on Sustainable Futures. Its overall purpose is to provide Ministerial oversight and determine priority actions to:

- embed sustainable development as the central organising principle of the Welsh Assembly Government;
- tackle the causes of climate change (greenhouse gas emission reduction); and
- adapt to the impacts of climate change.

11. This Cabinet Sub-Committee meets every two months and receives regular update reports on the work that different Ministers are undertaking within their portfolios to take action in these areas. For example, at our meeting of 4 June 2010 [the most recent meeting for which papers have been published] the following items were discussed:

- Embedding Action on Sustainable Development and Climate Change in the work of Heritage;
- Embedding Action on Sustainable Development and Climate Change in the work of the Directorate General for Public Service and Local Government Delivery;
- 10:10 Campaign;

- Update on Promoting and Maintaining Behaviour Change; and
- Communities and Climate Change.

DIRECTOR GENERAL, SUSTAINABLE FUTURES

12. At an official level, the Director General for Sustainable Futures takes forward and champions delivery of sustainable development across all departments, working directly to the Permanent Secretary.

13. In addition to having sustainable development at the very top of the civil service organisation in Wales, we also have a small dedicated sustainable development policy team that is responsible for implementation and coordination. This team has two key roles:

- working closely with other officials across the Welsh Assembly Government to embed sustainable development as the central organising principle in policies, programmes and business practices at all levels in the organisation; and
- working with external partners to encourage and enable them to adopt sustainable development as their central organising principle, through mechanisms we have developed such as the Sustainable Development Charter and Guidance and Wales Sustainability Week.

SUSTAINABLE DEVELOPMENT ADVOCATES NETWORK

14. The Sustainable Development Advocates Network is a group of officials from across the Welsh Assembly Government who act as sustainable development champions within their own policy area; staff from the Sustainable Development Commission (SDC) participate in the Network. Network members trial new ideas, promote best practice and share learning and experiences.

15. Some of the work taken forward by the Advocates has included projects with Forum for the Future to “pilot” approaches to embed the concept of a “central organising principle” within their Department. Examples include sustainable development workshops for team leaders in the Health Department and research with public sector procurement leads with Value Wales.

WORK TO EMBED SUSTAINABLE DEVELOPMENT IN DEPARTMENTS

16. Several Departments have created their own sustainable development tools and processes. Examples include:

- *Creating Sustainable Places* which is used by the Department for Economy and Transport (DE&T) to embed sustainable development in regeneration programmes;
- *Education for Sustainable Development and Global Citizenship programme* (ESDGC) which is a programme led by the Department for Children, Lifelong Learning and Skills (DCELLS) to embed sustainable development in the whole curriculum and management of schools; and
- *Sustainable Procurement* is led by Value Wales and includes work such as the development of a *Sustainable Procurement Action Framework* (SPAF) designed to build sustainability into specification design, supplier selection, contract award and management. [see also paragraph 22]

Further details of work within Departments can be provided.

SUSTAINABLE DEVELOPMENT TRAINING

17. *One Wales: One Planet* was supported in its first year by a training course that was made available to all staff entitled: *One Wales: One Planet—the central organising principle*. This course focused on staff developing a broad awareness of the scheme and the principles of sustainable development, including the duties on the Welsh Assembly Government in relation to sustainable development and how this is relevant to their work.

18. We have revised this course to reflect the lessons we have learnt a year on since the publication of *One Wales: One Planet*. We are also embedding sustainable development as part of other training programmes, for example within the suite of policy and procurement training.

SUSTAINABLE DEVELOPMENT PARTNERS

19. We have a number of key partnerships with sustainable development experts. In their different roles and relationships we feel these partnerships have added insight, scrutiny, specialist support, research and advice; without these “critical friends” the Welsh Assembly Government would not have made as significant progress as it has. Our principal partners are:

- *SDC Wales*—the SDC in Wales provides the Welsh Assembly Government with advice and commentary on sustainable development and has helped shape our thinking in a number of critical areas. For example, the SDC has very recently contributed to the work on Low Carbon Regions in Wales; has engaged with retailers on the single use carrier bags levy; and provided commentary in our Sustainable Development Annual Report 2009–10;

- *Cynnal Cymru*—Cynnal Cymru is an independent, not for profit organisation that was established by the Welsh Assembly Government to engage with civil society to increase understanding of sustainable development and assist in creating behaviour change towards achieving a “one planet Wales”. For example Cynnal Cymru supports the Network of external partners that have “signed up” to the Sustainable Development Charter and provided the views of civil society in our Annual Report 2009–10; and
- *Forum for the Future (Forum)*—Forum has worked with the Welsh Assembly Government over the last ten years to develop a range of tools and processes to embed sustainable development. For example, we recently commissioned Forum to research best practice organisations that have successfully embedded sustainable development. We used this work to inform the content of our Sustainable Development Charter [as noted in paragraph 13].

POLICY INTEGRATION

20. We have a Policy Gateway Tool, developed originally by Forum for the Future, as a tool for integrating sustainable development into policies as they are developed, ensuring that the policies contribute to economic, social and environmental outcomes in an integrated way, and so promote the long term wellbeing of people and communities in Wales.

21. During 2009–10 we continued to develop our policy making process. To complement the Gateway, a Policy Threshold tool is now used at an early stage of policy development to prompt policy makers to assess:

- the impact of the policy on long term wellbeing;
- integration of social, economic, cultural and environmental objectives;
- potential conflicts with other policies;
- likely effect on the sustainable development indicators; and
- sustainability aspects of any procurement activity.

SUSTAINABLE PROCUREMENT

22. We have developed a Sustainable Procurement Action Framework (SPAF), an assessment tool with levels 1 (lowest) to 5 (highest). Our Sustainable Development Scheme commits us to achieving level 5 of the SPAF by 2010, by demonstrating that we are building sustainability into specification design, supplier selection, contract award and management.

23. We apply a Sustainable Risk Assessment (SRA), which allows the consideration of all economic, social and environment factors within new procurement specifications, to all competitively tendered contracts over £25,000 in support of this.

How can governance arrangements for sustainable development in Government be improved, and how can sustainability reporting by Government departments be made more transparent and accountable?

24. The Welsh Assembly Government has a number of governance arrangements in place to ensure regular, open and transparent reporting. In some cases these procedures are statutory and in other cases, we have made additional arrangements because of the commitment of the Welsh Assembly Government to full transparency in its performance on sustainable development.

SUSTAINABLE DEVELOPMENT ANNUAL REPORT

25. The Welsh Assembly Government has a statutory duty to publish a Report [s79(6)(a) GoWA] on how the proposals sets out in its Scheme for Sustainable Development have been implemented each year. This report is laid before the National Assembly for Wales and is there is an annual Plenary debate to give Assembly Members the opportunity to give me their views on this report.

26. In our 2008–09 Annual Report, for the first time, we included independent commentary on our progress from the SDC Wales. In our 2009–10 Annual Report [laid at the National Assembly for Wales 21 September 2010] the SDC Commissioner for Wales, Peter Davies, once again contributed an independent commentary.

27. An example of the value of this independent commentary is that, in the recent debate on our Annual Report [28 September 2010] I took an amendment to the Motion (which welcomed the Annual Report), based almost entirely on a recommendation made by the SDC Wales in their commentary.

28. The 2009–10 Annual Report is also significant in that for the first time we included an independent commentary from Cynnal Cymru who gathered the views of civil society in Wales on the impact of our Scheme on our external partners.

SUSTAINABLE DEVELOPMENT INDICATORS

29. We report our progress towards becoming a more sustainable nation annually using five headline indicators of sustainable development:

- sustainable resource use—Wales' Ecological Footprint;
- sustaining the environment—percentage of Biodiversity Action Plan species and habitats recorded as stable or increasing;
- a sustainable economy—Gross Value Added (GVA) and GVA per head;
- a sustainable society—percentage of the population in low-income households; and
- wellbeing—the wellbeing of Wales.

30. Our scheme is structured around these five indicators, to provide a clear link between the proposals we set out in our scheme and how we report our progress towards becoming a more sustainable nation.

31. The latest Indicators Report for 2010 was published 26 August and, for the first time, we reported on the wellbeing of Wales as one of five headline indicators of sustainable development.

32. The five headline indicators are underpinned by 39 supporting indicators in a range of fields such as waste, crime, workless households and air quality. Overall, the publication showed that:

- 17 of 44 indicator assessments show a clear improvement;
- 22 of 44 indicator assessments show little or no change;
- 1 of 44 indicator assessments show clear deterioration;
- 4 of 44 indicator assessments have insufficient or no comparable data.

33. As with the Annual Report, there is an opportunity for Assembly Members to give me their views on the progress on our SD Indicators report during an annual Plenary debate.

GREEN DRAGON

34. In terms of the environmental sustainability of our own operations and its reporting, we publish an annual Green Dragon report (Green Dragon is a Welsh Environmental Management System in five levels, with level 5 equivalent to ISO 14001).

35. The Welsh Assembly Government has achieved Level 5 of the Green Dragon Standard for the entire administrative estate. The Environmental Management System now covers all administrative estate offices and in-house business processes and includes trained Green Dragon teams in 20 offices with responsibility for local environmental management.

SUSTAINABLE DEVELOPMENT IN GOVERNMENT (SDiG)

36. In addition to the above, we also ask the SDC to benchmark our progress in our environmental management as part of their Sustainable Development in Government (SDiG) reporting process.

37. Their first report was published in December 2009. The SDC reported “very good” or “good” progress in the follow areas: waste arisings, recycling, electricity from renewables, use of BREEAM and use of sustainability appraisals. Areas where no progress was reported were carbon dioxide emissions from road vehicles and water consumption.

38. We have used the analysis provided by the SDC within our annual review of our Environmental Management System (EMS), and the resulting Action Plan from this review will strengthen our progress across all areas.

COMMITTEE SCRUTINY

39. We are scrutinised on our policies and programmes on sustainable development by the Sustainability Committee of the National Assembly for Wales.

40. In addition, in January 2010 the Wales Audit Office (WAO) published a report on sustainable development and business decision making in the Welsh Assembly Government. The report is currently before the Public Accounts Committee of the National Assembly, and at the time of writing, we await their report.

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

41. We strongly support the work of the SDC, and in particular we value the following aspects:
- the expertise and authority on sustainable development provided by its Commissioners;
 - its ability to draw on good practice and initiatives from across the UK to advise us on the delivery of sustainable development in different policy areas;
 - in Wales, the SDC has convened stakeholders to consider particularly challenging issues and taken these issues forward on a “coalition of the willing” basis; and
 - its provision of independent commentary to us (for example in our Sustainable Development Annual Report) on the progress we are making and on the barriers to implementation.

42. We are committed to funding the delivery of the SDC's agreed work programme to the end of this financial year.

43. I am also attracted to the option of retaining the SDC as a dormant company. This has the potential to offer the following benefits:

- It allows the option of retaining the expertise provided by the existing Commissioners of the SDC, for members of the SDC to draw upon, possibly on a "call-off" basis;
- The Commissioners could provide a body of expertise for the House of Commons Environmental Audit Committee to draw upon;
- It retains the option of the re-establishing the SDC as a "live" company at some time in the future, should Members of the SDC wish to do this, without the cost of re-establishing a new company limited by guarantee.

There are legal and other administrative details that would need to be confirmed, but I have asked the Secretary of State for the Environment and other Ministers in the Devolved Administrations to consider this as an option.

44. I have stated that we will continue to seek independent advice on sustainable development, drawing on the best practice from the UK, Europe and internationally, to inform us as we take forward our policies. We also recognise the need for continued engagement and networking with all sectors and communities in Wales to ensure we can deliver our vision of a sustainable Wales.

45. We will therefore ensure that we develop new arrangements in place that are fit for our purpose here in Wales to provide appropriate advice on sustainable development and to catalyse and support action to deliver sustainable development in all parts of society across Wales.

20 October 2010

Further written evidence submitted by Jane Davidson AM, Minister for Environment, Sustainability and Housing, Welsh Assembly Government

SUSTAINABLE DEVELOPMENT

I am responding to your letter of 14 October 2010 in which you ask questions in relation to your Committee's inquiry into embedding sustainable development across Government. As you know, we have spoken about this inquiry, and I have already submitted evidence to the Committee. Your letter asks additional questions and I am pleased to set out my response to these below.

Does the Welsh Assembly Government intend to continue funding and working with the Sustainable Development Commission?

Following the announcement of the Secretary of State, I issued a written statement which confirmed that we would fund the delivery of the SDC's agreed work programme this financial year. This will give us time to set in place new arrangements in Wales.

I announced that we would continue to seek independent advice on sustainable development, drawing on the best practice from the UK, Europe and internationally, to inform us as we take forward our policies. I also recognised the need for continued engagement and networking with all sectors and communities in Wales to ensure we can deliver our vision of a sustainable Wales.

My officials are shortly to advise me on options that will ensure that we have arrangements in place that are fit for our purpose here in Wales to provide appropriate advice on sustainable development and to catalyse and support action to deliver sustainable development in all parts of society across Wales.

I have also written to the Secretary of State for the Environment, and Ministers in Scotland and Northern Ireland, asking them to consider the proposition that the SDC is retained as a dormant company. This has the potential to offer the following benefits:

- It allows the option of retaining the expertise provided by the existing Commissioners of the SDC, for members of the SDC to draw upon, possibly on a "call-off" basis;
- The Commissioners could provide a body of expertise for the House of Commons Environmental Audit Committee to draw upon;
- It retains the option of the re-establishing the SDC as a "live" company at some time in the future, should Members of the SDC wish to do this, without the cost of re-establishing a new company limited by guarantee.

What impact would the UK Government funding cuts have on your work with the Sustainable Development Commission?

There are three areas I would like to highlight:

- The work that the SDC does in Wales is informed by best practice from other parts of the UK. This allows an effective transfer of “on the ground” experience of delivering sustainable development, to inform practice in Wales. This element of the SDC’s work is of value and I would not wish to see it lost.
- It is extremely helpful to us to be able to draw on the authority and expertise provided by the Commissioners as we develop our approach to sustainable development in Wales. This element of the SDC’s work risks being lost, which is why I have suggested the option that the SDC remains as a dormant company.
- The SDC benchmarks the environmental management performance of the Assembly Government against other Whitehall Departments, through its Sustainable Development in Government reporting process. It is unclear if benchmarking in this way on environmental management performance will be practicable in the future in the absence of the SDC.

How does the Welsh Assembly Government expect to relate to the sustainable development delivery architecture that might be reconfigured after next March? Does it intend to work with the other devolved administrations, and if so how?

I wish to ensure that, as we develop the new arrangements in Wales, we build in the capacity to continue to draw on best practice in the UK and wider afield, to inform us as we take forward our sustainable development agenda. My officials are currently in discussion with other officials in the other Devolved Administrations about the practicalities of how this might happen.

Does the UK Government’s withdrawal of funding from the Sustainable Development Commission put at risk a consistent approach to sustainable development across the UK? If so how?

As I note above, we would wish to continue to draw on best practice in the UK and wider afield, to inform us as we take forward our sustainable development agenda.

25 October 2010

Written Evidence submitted by Andrea Ross, University of Dundee

1. EXECUTIVE SUMMARY

- Not only do we now know what is required to actually deliver sustainable development but in the UK much of the architecture is in place.
- The decision to cease funding the SDC is a significant blow to embedding sustainable development across Government and ought to be reconsidered.
- Unfortunately, the tools are not delivering real sustainable development fast enough.
- The slow progress can be attributed to an inconsistent application of sustainable development. Its imprecise meaning allows variable prioritization and there is nothing to compel decision makers to take a sustainable approach.
- Sustainable development is a poor champion for any one concern—environment, justice, human rights, economic development—instead it sets out an appropriate decision making process. To do so it needs to be based on clear theoretically robust, norms and values.
- Sustainable development needs to be redefined with ecological sustainability or living within the Earth’s limits at its core.
- Ecological sustainability should be considered a fundamental legal principle. Our ability to deliver the other fundamental legal principles (freedom, equality, justice) reduces as the Earth’s resources and resilience reduce. To protect these other fundamental legal principles we must learn to operate within a system based on ecological sustainability.
- It is imperative that tools such as environmental assessment and eco-footprinting remain focused on environmental impacts and limits and do not become blurred by other concerns such as social and economic impacts to ensure scientifically sound decisions are made about the Earth’s limits and the impact of activity.
- Once a determination has been made about the baseline natural limits, further decisions need to balance local needs and cumulative effects in relation to the other less critical aspects of the environment in addition to the social and economic concerns. This is the role of sustainable development.

- If the coalition genuinely wants to mainstream sustainable development into all government activity, they need to introduce legislation to compel compliance and adherence to best practice and promote consistency in its interpretation and use.
- Three possible legislative models are suitable in the UK.
- The first model focuses on creating binding legal procedures considered vital to implement sustainable development fully.
- The second model builds on the above procedural approach and also includes a substantive duty across government to ensure that its activities in implementing sustainable development are consistent with the objectives and principles set out in the sustainable development strategy.
- The third model goes further and establishes sustainable development as the central organising principle of governance in the UK.
- The approach could be staged whereby a statute introducing procedural changes is later augmented by more substantive provisions on the role of the strategy and /or sustainable development more generally in government decision making.

2. INTRODUCTION TO THE SUBMITTER

2.1 Andrea Ross is currently a Senior Lecturer in Law at the University of Dundee who has taught and researched in the areas of public and environmental law in the UK for over seventeen years. She is most well-known for her extensive research into the concept of sustainable development in the UK and has published widely on the topic in leading law and sustainability journals. Ms Ross is currently writing a book on Sustainable Development Law in the UK for Earthscan Publications.

2.2 Ms Ross is a pioneer in the development of specific university law courses in Sustainable Development and Environmental Justice as well as in embedding sustainable development into core law undergraduate courses including Legal Methods and Systems.

2.3 Ms Ross has contributed to inquiries both in the UK and Scottish Parliaments. She is the academic member of the Law Society for Scotland's planning law sub-committee and a member of the Society of Legal Scholars, Socio-Legal Studies Association, International Sustainable Development Research Society. She regularly contributes to workshops and conferences on both her research and teaching experiences and to a wide audience.

2.4 Andrea Ross Biographic Details—LLM 1992 (Aberdeen Univ), LL.B 1989 (Osgoode Hall, York Univ), BA programme 1984–86 (Univ of Western Ontario)—qualified Barrister and Solicitor in Ontario Canada. Senior Lecturer in Law, University of Dundee 2000- present; Lecturer, 1996–2000; Lecturer in Land Economy, University of Aberdeen 1992–1996; Corporate Counsel, Midland Walwyn Inc Toronto, 1990–1991.

3. FACTUAL INFORMATION

3.1 Excellent work across disciplines has been done worldwide on the implementation of sustainable development, “eco systems management” and an eco-systems approach. Not only do we now know what is required to actually deliver sustainable development but, certainly in the UK, much of the architecture is in place. Sustainable development has proven itself to be a resilient and valuable policy tool in the UK. We have strong strategies, with targets and action plans, good indicator sets, and, up until recently at least, enviable reporting, monitoring and review processes.

3.2 That said, the loss of the Sustainable Development Commission is significant and warrants additional comment. The UK is often held up as an example in its approach to sustainable development and the area where it consistently out performs other countries is in relation to its review and accountability mechanisms. (see IISD, OECD, CSD reports) The role of the SDC in providing both advice as well as critical and pragmatic annual reviews for each of the administrations in the UK is invaluable. Some of the best reporting I have seen are in the annual reports produced by the SDC particularly those produced for Scotland. The relationship which has developed between the SDC, the National Audit Office and the House of Commons Environmental Audit Committee is the envy of other countries. Before the expanding of the SDC's remit to do annual reviews, the EAC did not have the information it needed to properly meet its remit. The same would now also be true in the devolved administrations. I was delighted when the links between the EAC and the SDC were strengthened and impressed with the rigour of the scrutiny produced since then.

3.3 The advice and assistance the SDC provided UK departments in producing sustainable development action plans and the annual review of these plans has promoted more ambitious targets in the reduction of emissions, water use and waste. This all leads to savings financially and environmentally. At £3 million a year, the SDC was a bargain. The savings made possible through its reports, research and advice are significantly more than this sum. Consequently, SDC has used the success of the Sustainable Development in Government programme at UK level to encourage the devolved administrations to do the same.

3.4 The introduction of the new Office for Budget Responsibility, shows the importance the new government attaches to independent arm's length scrutiny. The decision about the SDC appears to me to be inconsistent with this message.

3.5 Unfortunately, even when the SDC was in place the reality is that while the tools exist they are not delivering real sustainable development fast enough. Progress on climate change targets remains far too slow, health problems due to poor lifestyle persist, change in transport choices remains negligible and the list goes on. Clearly the policy approach preferred by past and present UK and devolved governments is not delivering the cultural change required to meet their aspirations for sustainable development. The reason for the lack of progress is the inconsistent application of sustainable development. Two factors contribute to this inconsistency. First, sustainable development still lacks meaning and a clear sense of priority. The 2005 Framework for Sustainable Development does an admirable job. However, it still allows decision makers to shift priorities. Secondly, there is nothing compelling action. While some exceptions exist, too often individual government decisions at all levels are made for short-term financial or political benefit, without sufficient stakeholder or public involvement and often premised on the promised benefits of ever increasing levels of production, consumption and unbridled economic growth.

4 RECOMMENDATIONS FOR ACTION

4.1 *Ecological sustainability needs to be at the core of sustainable development*

4.10 The meaning, limits and role of sustainable development need to be clarified. In my opinion, sustainable development is best viewed as a framework or forum for decision making. It resembles a table to which different concerns are brought. Sustainable development is a poor champion for any one concern—environment, justice, human rights, economic development—instead it sets out an appropriate decision making process. To do so it needs to be based on clear theoretically robust, norms and values. At present those values are muddled and there is no clear prioritization between them.

4.11 Sound environmental management practices already advocate an ecosystem approach which recognises the relationships between healthy and resilient ecosystems, biodiversity conservation and human wellbeing. This approach promotes “ecological sustainability” which imposes a duty on everyone to protect and restore the integrity of the Earth’s ecological systems.

4.12 To make a significant impact on the way we live, ecological sustainability needs to be more than a policy objective. Clearly, the law has a crucial role here. Ecosystems don’t obey the rules of private property. The actions of one landowner in the land, blocking animal migrations, spraying crops, introducing new crop varieties, hunting and fishing, logging,—has implications far beyond his or her land. Current legal systems, preoccupied with private property and individual rights do not respond to modern needs. This approach, based on weak sustainability, whereby environmental factors are traded off against social and economic ones, has meant that today’s income has come from liquidating our social and natural assets capital.

4.13 To really make a difference, the ecological systems approach needs to be supported by a strong moral and legal normative framework. A new ethic is needed which advocates the need to operate within the ecological carrying capacity of the Earth. One way of obtaining the necessary status would be to treat ecological sustainability as a legal principle.

4.14 Decision-making based around ecological sustainability places the discussion of tradeoffs within the ecological limits of the Earth. Like justice and equality, ecological sustainability is an approach and should be considered a fundamental legal principle. This status is deserved since our ability to deliver the other fundamental legal principles (freedom, equality, justice) reduces as the Earth’s resources and resilience reduces and the best way to protect these other fundamental legal principles is to operate within a system based on ecological sustainability. Moreover, the leap to accepting ecological sustainability as a legal principle is a natural progression from what is already happening in UK law, especially given the ever growing pressure on the Earth’s environment. Sustainable development regularly appears in statutes. The English courts have accepted “sustainability” as a material consideration in planning decisions; that it is capable of being a main issue in planning law decisions and that it may be afforded significant weight.

4.15 For this approach to work priority must be given to the development and support of the tools needed to establish the Earth’s limits and the impact of activity on those limits. Tools such as Strategic Environmental Assessment, sustainability wedges and eco-footprinting etc are capable of comparing local and global impacts. It is imperative that these tools remain focused on environmental impacts and limits and do not become blurred by other concerns such as social and economic impacts.

4.16 Once a determination has been made about the baseline critical natural capital, further decisions will need to balance local needs and cumulative effects in relation to the other less critical aspects of the environment in addition to the social and economic concerns. This is the role of sustainable development.

4.17 With ecological sustainability at its core, sustainable development has the capacity to set meaningful objectives, duties, rules and provide boundaries for decision making as these roles are already present in recent UK and devolved legislation.

4.2 *Legislation is needed to support sustainable development and ecological sustainability*

4.21 However, this is not enough, we know the way forward and we know what is required. The difficulty is that without a consistent message and binding legal support for best practice short term gains will continue to trump long term objectives. This is simply not sustainable.

4.22 If we are serious about sustainable development then it is time for the UK administrations to give it legislative backing. If the coalition genuinely wants to mainstream sustainable development into all government activity, they need to introduce legislation to compel compliance and adherence to best practice and promote consistency in its interpretation and use.

4.23 Over and above its symbolic and educational value, specific legislation (in relation to sustainable development generally, and in relation to the production, use and review of the national or sub national sustainable development strategy, more specifically), would impose mandatory obligations on policy and decision makers often with meaningful consequences both inside and outside the courtroom. Legislation cannot bring about change discussed above. It cannot explain to leaders the importance of operating within the Earth's limits. Ideally this norm would underpin any general legislative action. However, there are ways of imposing legislative obligations that would make a significant difference without being at the stage, politically, to explicitly prioritise ecological sustainability.

4.24 A UK wide statute on sustainable development that binds both central and devolved administrations alike is unfeasible following devolution. Nonetheless, specific legislation on sustainable development for each of the UK administrations would be valuable and not out of step with modern UK legal culture. In 1998, the UK Government imposed procedural obligations on the Welsh Assembly and the fact the Welsh Assembly Government has the most progressive strategy of the UK administrations on sustainable development is testimony that even the vaguest of statutory provisions can promote increased action on sustainability.

4.25 Essentially, I have explored three alternative models exist which would be suitable in all the jurisdictions of the UK, although, at present, while Scotland and Northern Ireland could enact their own statutes, the UK Parliament would need to enact any new legislation for Wales. All three models have the capacity to deliver increased consistency in decision making by turning what may currently be established good practice or policy into legally binding obligations that can compel compliance.

4.26 The first model focuses on creating binding legal procedures considered vital to implement sustainable development fully. The imposition of obligations to produce a strategy subject to consultation and time constraints and to pursue other measures such as action plans, spending reviews, indicators, and targets as well as report and monitor progress would be a major step forward in making the "sustainable development toolkit" operational. It may have also protected the role of the Sustainable Development Commission from the UK Government's decision to cease its funding. That said, procedures are limited as alone they cannot not necessarily deliver a cultural change within governments.

4.27 The second model builds on the above procedural approach and also includes a substantive duty across government to ensure that its activities in implementing sustainable development are consistent with the objectives and principles set out in the sustainable development strategy. This approach gives the strategy legal status, provides a clear point of reference for those bodies with substantive obligations relating to sustainable development and generally improves the understanding of the term. It does not explicitly set out the role of sustainable development in the workings of government. This omission misses out on important benefits such as raising awareness and education, and it fails to address directly any inconsistencies in the interpretation and application of sustainable development.

4.28 The third model goes further and establishes sustainable development as the central organising principle of governance in the UK. Arguably, this is the only way to truly secure the cultural change required for genuine sustainability. The new UK Coalition's emphasis on changing the culture of consumption to one of investment is clearly in line with sustainable development thinking. Indeed our ability to act fairly and justly will continue to reduce as the Earth's resources and resilience reduces. The best way to protect these other fundamental values is to operate within a system which respects the Earth's limits. For this third model to be operational two additional legislative provisions are needed. First, there must be a clear declaration of purpose by government about the role of sustainable development in all its activities. A provision based on the commitment in new Welsh strategy, *One Wales: One Planet, a New Sustainable Development Scheme for Wales, 2009* would work very well as a legal declaration: "sustainable development will be the central organising principle of Government, and we will encourage and enable others to embrace sustainable development as their central organising principle and a general duty imposed on all public bodies". Secondly, the legislation must impose meaningful substantive duties on all government bodies. These duties should do more than simply "have regard to" or "take account of" sustainable development. There is precedent for a better approach in previous UK and Scottish statutes—for example, "contribute to the achievement of sustainable development". This phrasing is strong enough to provide a framework for all decision-making across government.

4.29 This third model is a big political commitment. The implementation of sustainable development to date has been a staged process in the UK and elsewhere. There is no reason to believe it will not continue to be so and as a result any legislative programme for sustainable development can staged. Introducing even the most basic procedures could significantly improve the UK's implementation of sustainable development. Moreover,

the value of legislating to define sustainable development or of referring to certain underlying principles such as good governance or sound science is debatable. Some flexibility is needed to allow sustainable development to be contextualized and to evolve over time.

5. CONCLUSION

5.1 With ecological sustainability at its core, sustainable development has the capacity to set meaningful objectives, duties, rules and provide boundaries for decision making as these roles are already present in recent UK and devolved legislation. The re- instatement of the Sustainable Development Commission would assist this process. Moreover, a new Sustainable Development Act in each of the UK administrations would raise the status of each sustainable development strategy and of sustainable development itself. It would also upgrade the current policy approach to delivering sustainable development from a nice idea to a legal obligation.

For more information see:

Andrea Ross “It’s Time to Get Serious—Why Legislation Is Needed to Make Sustainable Development a Reality in the UK” *Sustainability* 2010, 2(4), 1101–1127; doi:10.3390/su20411012009.

Available online at <http://www.mdpi.com/2071-1050/2/4/1101/>.

Andrea Ross “Modern Interpretations of Sustainable Development” *Journal of Law and Society* 2009, 36 (1) 32–54.

24 October 2010

Written evidence submitted by Sustainability East

Sustainability East is an independent sustainable development champion body established 12 years ago, serving primarily the East of England (the geographic counties of Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk). It has provided central government, regional bodies and local authorities and businesses with informed studies on issues such as climate change, water resources, renewable energy potential and strategic coastal initiatives. Its members are independent, but come from a range of public, private and voluntary sector backgrounds and variously possess economic, environmental and social expertise.

SUMMARY

(i). If the government is to achieve its declared ambition to be “the greenest government ever”, it will need expert advice, based on authoritative research, and a transparent and accountable method of measuring outcomes.

(ii). Sustainable development—a better quality of life for everybody, now and in the future—is too important to be left to be achieved (or not) at local level. It requires strong national leadership at the highest level of government, informed by expert advice. Many measures needed—legislation and taxation—can be delivered only by central government and Parliament. There is also an important international dimension.

(iii). Policy needs to be supported by good evidence, address inconsistencies and conflicts between objectives, and be coherent across all sectors and issues. Policy-making cannot be left to “the Big Society”—it requires political leadership, coupled with an understanding of the nation’s environmental, social and economic capacity and constraints.

(iv). Withdrawal of funding from the SDC is premature, and a false economy: alongside the planned closure of Defra’s Sustainable Development Unit, it sends a message that the government is not serious about sustainable development.

(v) Without a robust, non-partisan mechanism for scrutinising and reporting on the government’s and public bodies’ performance against sustainability targets, future quality of life for the citizens of this country—and globally—risks being compromised.

EMBEDDING SUSTAINABLE DEVELOPMENT ACROSS GOVERNMENT

1. We welcome the decision of the Environmental Audit Committee to hold an inquiry “into how sustainable development can be further embedded in Government policy decision-making and operations, in the light of the Government’s decision to withdraw funding for the Sustainable Development Commission (SDC)” in respect of its work in England. We are grateful for the opportunity to give evidence.

2. The essential background to our concerns is that major changes are needed in the way we live, and in current social, economic and environmental policies, if we are to achieve sustainable development—a better quality of life for people now, without compromising the quality of life of future generations—in the UK and globally. Environmental problems—man-made climate change, loss of bio-diversity and depletion of natural resources—may be the clearest examples of the unsustainability of our present economy and way of life; but there are also major challenges in terms of, for example, access to services, social cohesion, inter-generational equity and health inequalities. Local action is important, but some of these issues can be addressed only at

national and inter-governmental (EU and global) levels. So far as we are aware, the new Government remains committed to the broad outline of policy set out in “*Securing the Future*”, the UK-wide strategy for sustainable development published in 2005.

3 We understand and do not oppose the Government’s desire to save public expenditure and reduce the proliferation of non-departmental public bodies (NDPBs, or “quangos”) by abolishing unnecessary bodies and functions and returning other responsibilities to Ministerial departments. We also recognise that arguably accountability is enhanced when Ministers have to answer directly to Parliament for their decisions. However, there is also a cost if—at a time of increasing public distrust of politics—advice is not seen to be impartial and independent of party and electoral pressures.

4 The Government will not be able to demonstrate “greenest government” credentials without an independent scrutiny mechanism—for transparency, accountability and credibility purposes. The Sustainable Development Commission (SDC) was able to fulfil this remit, in that it had the freedom to identify gaps in knowledge and weaknesses in policy, and could speak out publicly if it thought fit. It gave praise where due, but was unafraid to challenge government when appropriate. Ceasing to fund its work in England suggests that the Government is nervous of challenge and accountability.

5. The Government’s focus on economic growth and the need to cut the public sector deficit is not inconsistent with good sustainable development practice, in terms of the need to use resources efficiently. There is great potential to grow the economy, pursuing a low carbon agenda, in ways that will enhance wellbeing, achieve social and environmental objectives, and enhance the UK’s international competitiveness. But to do this, sustainable development has to be understood and embedded in all government policies and across departments. Short-term spending cuts could have a profound adverse effect if they do not consider the wider implications. For example, departments under pressure to cut their budgets may opt to procure products with higher embedded energy, or from countries with lower environmental and labour standards. We fear that Ministers do not yet fully understand this, without expert advice from a body such as the SDC.

6. The SDC in its July 2010 report “*Becoming the Greenest Government Ever?*” acknowledged that significant resource efficiency improvements have been made, but also that these are the tip of the iceberg. Thus it is clear that many parts of government know how to cut greenhouse gas emissions, but measures so far have mainly focused on their own operations—utilities, travel etc—savings which should be relatively easy to achieve and demonstrate.

7. Much harder will be to demonstrate the impact of policies to be delivered by others—but surely the Government does not intend to limit its green credentials to its internal operations? Policy decisions—for example on the location of new development, energy pricing and investment in retro-fitting energy-saving measures in existing buildings—have far more effect on the national aggregate greenhouse gas emissions. If the government is to create a reputation and legacy as the greenest government ever—and to convince the public it deserves such an accolade—there should be a recognised independent body to help it set ambitions and targets, and monitor and report on achievements. It would be a false economy to abolish the SDC altogether, without an independent scrutiny body in its place.

8. Targets, backed by statistical evidence, are needed as a focus for action and aspiration. These should be drawn up with the help of independent advice to ensure that they are not chosen simply by reference to their achievability. Performance against targets needs to be independently monitored, to ensure accountability, and to assess what policies are working, or why targets are not being achieved, or are unachievable, or have undesirable side-effects.

9. Besides reporting on performance against SD targets, the SDC has an important role in advising Ministers and others across government, and promoting good working practice. It could be seen as arrogant of the Government to assume that it knows all the answers to potential policy conflicts, and what works to achieve good sustainability practice, without impartial external advice.

10. The inquiry remit cites the Secretary of State for Environment, Food and Rural Affairs as saying “*we will put processes in place to join up activity across Government more effectively*”. This will not be easily achieved, and past experience of “joining up government” is discouraging. At regional level, the Government has in our view already taken a backward step by abolishing Regional Spatial Strategies, which took an evidence-based view of the economic, social and environmental needs of different areas of the country, and provided clear guidance and targets, underpinned by robust sustainability appraisals, and subject to independent public scrutiny.

11. We agree that policies across government must be made more coherent. There are still significant policy conflicts which work against achieving sustainability and reducing inequalities. The East of England Integrated Sustainability Framework “*Sustainable Futures*” (2009) identified some crucial regional issues which are also pertinent at a national level:

- (a) There needs to be a step-change in housing supply to give people the chance of a decent home and address constraints on economic growth. There are challenges in ensuring that new and expanded communities really are sustainable; appropriate jobs, cultural assets, social infrastructure and green spaces must also be created;
- (b) There is a disjunction in policy between the need for major infrastructure improvements to cater for

growing demand for travel as incomes rise, and the commitment to reduce greenhouse gas emissions from transport. At root, the challenge is to decouple economic growth from increasing demands to travel. This is particularly difficult in a region that has such a widely spread population.

- (c) It is vital for the economy that we build on our substantial knowledge-based assets. Some of these could be lost if there is no continued funding for regional observatories or archives. Expensively acquired research must be publicly accessible, to support local and national decision-making.
- (d) Our skills base and labour supply is relatively weak and there are shortages particularly in some low paid sectors, leading to concerns about sustainability, as people on middle and lower incomes find it harder to live in many parts of the country.
- (e) Poverty, social exclusion and lack of access to services remain major issues. This is apparent in areas with relatively weak economies, but also in some more buoyant and affluent areas. This suggests major and continuing challenges in terms of improving everyone's quality of life.
- (f) There are significant disparities in health and wellbeing, strongly correlated with measures of relative poverty. Life expectancy varies widely depending on area of residence and access to social, economic and environmental assets. People's environment has a profound effect on health and wellbeing, which in turn has implications for the economy. We need to change the culture of focusing on the treatment of illness rather than on preventative measures (see *Fair Society, Healthy Lives* (February 2010), the independent review into health inequalities in England chaired by Professor Sir Michael Marmot.
- (g) The way we use resources is unsustainable. Energy, water, land, soil quality, biodiversity, and the fragmentation of habitats are of particular concern. The recent report "*Making Space for Nature—a review of England's wildlife sites and ecological network*", chaired by Professor Sir John Lawton, makes this point compellingly. There is also a need to respond creatively to the pressures and opportunities associated with climate change.

12. These are all crucial issues which require strong policy measures if conflicts are to be resolved; they cannot satisfactorily be left to be dealt with at a local level, whether by local authorities or by "civil society". However, government does not currently employ an integrated approach to policy-making. An independent body, with a synoptic understanding of the issues, could advise on the strategic economic, social and environmental implications of new policies. This would help government resolve conflicts, and avoid unforeseen consequences including new disparities and inequalities. It would also lead to greater efficiency savings in the future, and to measures to help mitigate climate change—another stated (indeed statutory) ambition of government.

13. The Government has indicated that it expects local authorities to become more autonomous and less subject to scrutiny except by their own citizens. With the abolition of indicators, how will local citizens know whether their LA is achieving resource efficiency and enhancing wellbeing? The withdrawal of Regional Spatial Strategies and local indicators may allow progressive authorities to develop innovative policies to respond to their areas' needs; but authorities who are resistant to change, or unresponsive to the needs of their citizens, could further stagnate, leading to greater disparity between areas. The Audit Commission is also to be abolished. Given the low level of participation in local elections, and the extent to which these are dominated by national political trends, what recourse will local people have if their authority is failing their needs? A scrutiny body with a sustainable development remit could take on an independent challenge role.

14. The Government says it expects sustainability to be achieved by "bottom-up" actions from a newly empowered general public. But the empowerment, and the evidence that it can work, need to come first, before dismantling centralised mechanisms. Otherwise this could be seen as abdicating responsibility for putting—perhaps unpopular—policies in place. The Government still needs to demonstrate leadership, and to intervene, where necessary, via fiscal or regulatory measures.

15. Local delivery requires effective participatory decision-making at local level. If, however, citizens are to be empowered to make sensible decisions and instigate positive local actions, education for sustainable development, in which the SDC currently has an important role, needs to continue and grow. There is a need for expert advice on how to instigate behavioural change in order to learn how to live within our social, economic and environmental limits and ultimately achieve a better quality of life for all.

16. There is ample evidence that species are declining; habitats are degenerating; there is competition for land for housing, industry, food and energy. Policies need to acknowledge this, and adopt an approach that takes account of "eco-system services"²⁹—that is, the way that human life and our standard of living are sustained by natural resources and the natural environment. Do we know what our environmental limits are? Have they been defined? What happens when they are breached? Expert advice is needed to know what approaches to make things better, and what not to do in order not to make things worse.

17. Sir Nicholas Stern's comprehensive review "*The Economics of Climate Change*", published in 2006, concluded that we should continue to ignore climate change impacts at our economic peril. Among his recommendations were many that can only be achieved by government intervention, not left to local decision making:

²⁹ Sustainability East and partners in the East of England are undertaking groundbreaking research to test and refine the Ecosystem Services Approach as a sustainable development decision making tool at the local level.

- Reduce consumer demand for polluting goods and services.
- Make global energy supply more efficient.
- Act on non-energy emissions—for example by preventing further deforestation.
- Promote cleaner energy and transport technology, with non-fossil fuels accounting for 60% of energy output by 2050.

The then Government's response to the Stern Review included the intention not only to enshrine carbon reduction targets in statute—which has happened—but also to create a new independent body to monitor progress. If the SDC or a similar independent body was retained, it could take on a formal role to monitor carbon reduction targets.

18. There might have been scope to make savings by merging the SDC with another body with an advisory and scrutiny function. However, the Audit Commission, with its related role of monitoring local authorities' effectiveness in using resources, is also scheduled for abolition; and no other national body has a remit that covers economic, environmental and social policy areas.

19 If the Government's intention was simply to reduce costs, it would have been possible to slim down the SDC, possibly reconstituting it as an expert advisory committee, without withdrawing funding altogether. No doubt Defra or another department (see below) could take on its operational work, e.g. in education for sustainable development; but the wholesale abolition of its role in England suggests a desire to reduce scrutiny and the risk of criticism.

20 If, therefore, as seems likely, the decision to withdraw funding from the SDC is irreversible, new accountability mechanisms are needed. Your Committee could perform this role at national level, with appropriate advice; but it will also be necessary to retain a framework of targets against which to monitor the Government's performance. At local level what is most important is to maintain a consistent reporting framework for local authorities, so their electors can compare their performance with that of neighbouring authorities.

21. Within government, the Cabinet Office should have lead responsibility for sustainable development, to facilitate its embedding into policy across all departments. Placing the function in a single issue department (as now in Defra) reinforces the misconception that SD is solely an environmental issue, rather than, crucially, also an economic and social one.

22. As Sustainability East, we look forward to continuing to work with local authorities, businesses, NDPBs, NGOs and other stakeholders across the East of England to promote sustainable development—which remains Government policy—and advise on the best ways of achieving it. We hope that similar champion bodies will survive in other parts of the country. There is no doubt, however, that the task will be much harder, not only in a climate of severe public spending restraint, and following the abolition of the regional organs of government (GOs and RDAs), but also without access to the expert advice provided by the SDC at national level.

26 October 2010

Written evidence submitted by Department for Communities and Local Government

INTRODUCTION

1. The Department's approach to sustainable development is shaped by the Department's ambition to lead a radical shift in power from Westminster to local people to enable people to have control of the decisions which affect them, as set out in the draft Structural Reform Plan published in July 2010. In particular the Department aims to make localism and the Big Society part of everyday life by decentralising power as far as possible; reinvigorating local accountability, democracy and participation; increasing transparency; meeting people's housing aspirations; and giving communities a stronger role in planning.

2. Delivering these priorities will contribute to sustainable development:

- Local people are best placed to understand what is right for sustainable development locally. Empowering local people and communities will enable them to respond confidently to the challenges of sustainable development as well as other issues.
- Action on transparency will enable local people to hold local authorities to account on what they are doing to promote the sustainability of their local area.
- The planning reforms being introduced are geared to giving local people and communities far more ability to determine the shape of the places in which they live, including by creating a new designation to protect green areas of particular importance to local people.

3. As a practical example of this overall approach, the Department is working with the four Big Society vanguards announced by the Prime Minister in July. One of the vanguards is the London Borough of Sutton, which is seeking to develop the Hackbridge Sustainable Suburb. The Department is working with the Department for Energy and Climate Change (DECC) and the Department for the Environment, Food and Rural Affairs (Defra) to provide assistance to realise the vision of Hackbridge residents and implement the principles

of one planet living, including providing expert advice on options for setting up a decentralised energy network. The Department is also exploring ways of increasing community involvement in Hackbridge, for example in the restoration of the River Wandle which is being led by the Wandle Trust.

4. The Department is working across Whitehall on other actions to promote a low carbon and eco friendly economy and to be the Greenest Government ever. This includes work on improving the energy efficiency of new homes through the zero carbon homes policy; working with DECC on the Green Deal; and working with Defra on the preparation of the Natural Environment White Paper.

5. With regard to its own operations, the Department published its Sustainable Operations Policy in February 2008, to support delivery of the targets for Sustainable Operations on the Government Estate (SOGE). This will be revised when post SOGE targets have been agreed. Delivering a resource efficient, low carbon estate is crucial in both supporting its policy work and in operating an effective organisation. To increase transparency, the Department also publishes utility consumption data for its headquarters building on its external website. The Department is currently on course both to deliver all the 2010–11 SOGE targets and the Prime Minister's commitment to reduce carbon emissions from offices by 10% by May 2011.

RESPONSES TO THE COMMITTEE'S QUESTIONS

1. *What procedures specifically initiated in the department have been most successful in improving sustainable development in your department? Why have these worked well? Which procedures have not worked and why?*

1.1. The main procedure which the Department used historically was the preparation of, and reporting against, Sustainable Development Action Plans (SDAP). At the time, this was a useful process in terms of raising awareness of sustainable development in the Department, pulling together a coherent picture of sustainable development activity across the Department and identifying areas where further action might be needed. The Department was pleased to receive positive feedback from the Sustainable Development Commission on the last SDAP report prepared which covered 2008–2009.

1.2. The downside of the SDAP was that, because of the very comprehensive approach taken, it became a check list of activities, and reporting tended to focus narrowly on checking what had happened against these, rather than the development and delivery of an overall strategy. Also, as well as SDAPs, Carbon Reduction Delivery Plans and Departmental Adaptation Plans were required by the last administration (the Department published these in March 2010). Inevitably there was some duplication between these documents and the SDAP.

1.3. It will be important to ensure that any future requirements for Departmental Plans of this nature are well focused and complement, rather than cut across, each other.

1.4. The Department has established for some time a programme board of senior managers, chaired at Director General level and drawn from across the Department, to oversee its work on climate change and sustainable development. The board is currently revising its role and ways of working.

1.5. The Department has participated fully in the cross Whitehall mechanisms established and led by Defra and DECC on this agenda. They have been useful to enable Departments to coordinate activity and learn from each other. The Department has also welcomed the challenge provided by bodies like the Committee on Climate Change, most recently the report of the Adaptation Sub Committee on its first review of Government action on climate change adaptation.

1.6. In relation to its estates and operations, the Department has had particular success in reducing carbon emissions from its buildings by combining traditional energy efficiency techniques with the use of new technologies, such as high efficiency lighting, boiler optimisers and heat recovery cooling systems, reducing emissions in DCLG's HQ building by 27% since 2007, despite increased occupancy.

1.7. The introduction of Board level Sustainable Development in Government (SDiG) progress reports has also been crucial in securing senior support, ensuring buy-in to potentially challenging new initiatives, such as further reductions to office heating. Board reporting has helped ensure the delivery of the SOGE targets became a corporate priority.

1.8. An environmental champions network was established in 2006 both to support the Department's Sustainable Operations team and to foster more sustainable behaviour in the workplace. This group of staff volunteers have organised a number of successful campaigns to increase environmental awareness and help embed sustainability in daily business. The success of many of these campaigns has been in part because the group is staff led and comprises enthusiasts who are able to relate to their colleagues on a familiar level.

2. *To what extent are civil servants in your department made accountable for working more "sustainably"?*

2.1. As noted above, the Climate Change and Sustainable Development Programme Board is chaired at Director General level so providing Board level oversight and challenge to the work of the Department on sustainability and climate change.

2.2. A small central team manages the Department's programmes of work on climate change and sustainable development. However, action on these issues is not simply the preserve of this team. Specific policy teams

will take forward specific actions—for example the Planning Directorate are taking forward work on the planning reforms described above. Team and individual work objectives reflect those responsibilities appropriately and are assessed as part of the performance management process for both policy teams and staff working on the sustainability of the Department's operations.

2.3. Consideration of the environmental impacts of the Department's policies, alongside other impacts such as equality impacts, social impacts etc. are included as part of the Impact Assessment process when new policies and programmes are being developed. This provides a systematic approach to challenge and assessment—including for instance assessment of the impact on carbon emissions. The Department has recently launched a policy making framework designed to give support and guidance to staff on all aspects of making policy.

2.4. The Department has a Corporate Procurement Sustainable Procurement strategy, which is published on our Bravo e-tendering portal so that suppliers are able to view our approach and commitments. The Department's newly expanded procurement policy team has an objective to attain Level 2 of the Defra Flexible Framework by the end of the current financial year, with a progression through to Level 3 (and beyond) thereafter.

2.5. The Department's procurement team will utilise the Flexible Framework and will complete an initial review and establish a sustainable procurement work plan by end November 2010, with a view to incorporate its use by end of 2010–11. Although some key suppliers have been approached with regard to closer working on sustainability issues this remains patchy overall and a programme to address this and work with key suppliers to introduce plans with them will commence during the remainder of 2010–11.

2.6. As part of the response to the challenge to reduce the Department's own emissions by ten per cent, initiatives such as CO₂ pledge walls, climate change seminars, and other behaviour change campaigns have been introduced to help encourage staff to change their working practices, and to think about any wider implications for policy development.

3. What would help DCLG engage more effectively with the bodies set up by Government to deliver sustainable development targets?

3.1. The Department works with a wide variety of bodies on this agenda. As noted above, the Department contributes to the cross Government work led by DECC and Defra. The Department also works with bodies such as the Environment Agency and Natural England on issues of joint interest.

3.2. With regard to work on sustainable operations, the Centre of Expertise for Sustainable Procurement (CESP) is the main point of contact. Engagement with CESP is positive; however, greater opportunities for consultation would be of value as would a clear forward work plan for CESP's own work. A clearer governance structure for sustainable development across Government would enable more effective outcomes, as would greater coordination and cooperation between bodies such as the CESP and other Government departments with major sustainability policy interests.

3.3. Local government has played, and will continue to play, a key role in delivering sustainable development. The Government does not believe, however, that the right way to do this is by imposing targets or reporting processes on local authorities on sustainable development, or other issues. The Government therefore has announced recently the abolition of the previous administration's National Indicators and Local Area Agreements. Instead a single comprehensive list of data will be drawn up. The Government will work with the sector on the list of data. As part of this process, the Government will be open to suggestions from the sector about data relevant to sustainability which might be included on the list.

4. How has the Sustainable Development Commission (SDC) contributed towards improving the sustainability of your Department? How much money has DCLG saved, over what period, by implementing measures recommended by the SDC?

4.1. The Department and the SDC engaged on early work to build capability and raise awareness of sustainable development within the Department. The Department also has had support, feedback and challenge from the SDC on Sustainable Development Action Plans (SDAPs) and progress reporting against these.

4.2. The SDC's Sustainable Development in Government (SDiG) annual reports were of particular value in raising the profile of performance against SOGE targets, and the performance league table fostered competition with clear reputational drivers. The SDC also created opportunities for best practice sharing and networking through the SDiG report, the SD Panel and through events.

4.3. It has not been possible to quantify financial savings achieved through implementing SDC-specific recommendations due to few if any actions being introduced in isolation from other measures already underway within the Department. Some recommendations which may have delivered significant savings have been previously rejected by Government, such as incorporating emissions reduction targets for all travel modes into SOGE.

5. To what extent does the SDC's Sustainable Development in Government (SDiG) reporting process provide an effective means of monitoring the Department's performance?

5.1. The SDiG reporting process provided clear benefits in monitoring performance against the environmentally focused SOGE targets, comparing progress against both previous years and other Government departments. Later SDiG reports also included more benchmarking which allowed further performance assessment, in addition to the league table. The SDC reports also included sound recommendations which the Department has found useful.

5.2. In more recent years, the SDiG reports have developed into commentary on performance rather than performance assessment itself, to avoid duplication with Government reporting requirements now managed by CESP.

5.3. The existing SDiG reporting process is necessarily limited to specifics of the SOGE targets such as carbon emissions, waste and water with social aspects confined to reporting on volunteering activity. Performance on wider issues was set out in the Department's SDAP reports.

6. How does the Department verify the data it submits on Sustainable Operations on the Government Estate (SOGE) targets? How might the submission and verification procedure be improved under the new SDiG process?

6.1. The Department incorporates a variety of checks to verify SOGE data, with the degree of verification varying across the estate, dependent on availability of resources, the utility metering infrastructure and source of data (e.g. from landlord, facilities management contractor, major occupier).

6.2. The most basic check undertaken for all data involves the central Department's sustainable operations team sense checking data against previous years' figures and benchmarking with similar buildings and organisations. Energy and water data is also checked against utility bills. More sophisticated verification involves checking billing data with half hourly data generated by automatic meter readers (AMRs).

6.3. To ensure greater certainty around data accuracy, an auditing element could be introduced which could be relatively light touch, to avoid further increasing the reporting burden. The audit could be undertaken by either the Centre of Expertise in Sustainable Procurement or by departments' internal audit functions. To reduce the burden, a sample element could be audited such as energy data from a particular building or road travel from one Executive Agency.

1 November 2010

Written evidence submitted by Richard Lochhead MSP, Cabinet Secretary for Rural Affairs and the Environment, the Scottish Government

Thank you for your letter asking about the Scottish Government's approach to sustainable development and its response to the UK Government's decision to withdraw funding from the Sustainable Development Commission.

The Scottish Government is still considering the best way forward for Scotland following the UK Government's decision. We will make announcements in due course. I also note that the attached summary of SDC's current role, funding and activities in Scotland has recently been shared with the committee at official level.

On the wider question about how sustainable development is pursued by the UK and Devolved Governments, it might be helpful if I explain that The Scottish Government does not manage a separate sustainable development strategy. Instead, our distinctive approach has been to mainstream sustainable development across the organisation through our central Purpose of "*creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth*".

This is set out in the Scottish Government's Economic Strategy, supported by the National Performance Framework, which now provides a shared set of high level outcomes to focus the whole of the public sector. In particular our 15 National Outcomes help us address the sustainable development principle of focusing across economic, social and environmental factors in decision making.

SDC looked closely at this structure in 2008 and were positive about the approach to sustainable development governance.

The Scottish Government attaches high priority to sustainable economic growth and our approach takes account of our unique circumstances in Scotland. However, we believe it is important that, whatever the solution going forward in our respective administrations, we continue to work together to share and learn from each other's experiences.

Sustainable Development Commission's role, funding and activities in Scotland

SUMMARY FOR ENVIRONMENTAL AUDIT COMMITTEE

1. The Sustainable Development Commission is a company limited by guarantee, jointly owned by the UK Government and the devolved administrations, including the Scottish Government. SDC Scotland currently receives £260,000 of core funding per year for the following roles:

- Independent scrutiny:
 - holding the SG to account on progress in sustainable development.
- Advisory:
 - drawing on expert opinion (including through SDC in the rest of the UK) to input to policy development across the SG; and
 - producing evidence-based public reports on important environmental, social and economic issues.
- Capacity-building:
 - establishing good working relationships with key parts of the SG to build understanding and skills for sustainable development.
- Advocacy:
 - encouraging a climate of opinion in which sustainable development can become a reality, promoting wider public debate and shared learning;
 - developing effective partnerships with key networks and organisations to deliver best practice in sustainable development; and
 - responding to SG policy initiatives.

2. In 2009–10, SDC Scotland also received £318,000 in project funding from SG to deliver additional services, drawing on their core expertise:

- Scottish Sustainable Development Forum secretariat (£35,000) and events (£15,000)
- Knowledge transfer (£5,000)
- NHS Good Corporate Citizenship Assessment Model (£58,000)
- Climate Challenge Fund Promotion and Knowledge Transfer (£133,000) and Alliance Administration (£72,000).

3. For Illustration, recent and ongoing activity in Scotland includes:

- annual assessment of Scottish Government performance on sustainable development;
- chaired and co-ordinated the Steering Group for the Education for Sustainable Development Action Plan;
- input to the Food & Drink Leadership Forum and Zero Waste Think Tank (chairing one of its sub-groups) via Scottish Vice-Chair, Jan Bebbington;
- ongoing input to the Zero Waste Scotland Programme Board and High Level Group Sustainable Scotland;
- working with SG and NHS Scotland to develop and implement the Good Corporate Citizenship Assessment Model for Health Boards to manage their environmental and sustainability impacts;
- recent Scottish studies on renewable heat and sustainable transport;
- dissemination seminars on its *Prosperity without Growth?* think-piece and *Low Carbon Regions Wales* work;
- assisting SG to develop an environmental and sustainability reporting system for use across the public sector;
- co-ordinating the Scottish Sustainable Development Forum; and
- co-ordinating the Climate Challenge Fund Supporting Alliance to deliver networking and learning (with a particular emphasis on behaviour change) between CCF communities and other key stakeholders.

Written Evidence submitted by the Office of the First Minister and Deputy First Minister, Northern Ireland Executive

INQUIRY INTO EMBEDDING SUSTAINABLE DEVELOPMENT ACROSS GOVERNMENT

Thank you for your letter of 14 October regarding the above, and the opportunity to contribute to the associated deliberations. We would like to begin by registering our disappointment at Defra's announcement on 22 July of its decision to withdraw funding from the Sustainable Development Commission (SDC).

To date, we have found the work of the SDC to be of significant value to us in our efforts to progress and embed the sustainability agenda in, and beyond, Government. We therefore welcome your inquiry at this time.

Please find attached our response to each of the specific questions presented by the Environmental Audit Committee in the attached Annex.

Annex

Question 1: *“Does the Northern Ireland Executive intend to continue funding and working with the Sustainable Development Commission?”*

ANSWER:

The Secretary of State's announcement on 22 July to withdraw funding did, in our opinion present the devolved administrations with a *fait accompli* in terms of continuation of funding.

The proportionality of sponsorship funding provided the Executive with low cost and effective access to national (and indirectly, international) expertise on sustainable development. There was, in reality a “multiplier effect” in terms of central and devolved benefits, given that the SDC was engaged in many policy and operational activities which could inform and advise some, or all, of the contributing administrations *via* a strong organisational and intellectual network.

The decision by the largest sponsor *i.e.* Defra, to withdraw funding effectively destroys any economies of scale, and renders the “multiplier effect” ineffective. It is, therefore, in our opinion, neither sensible nor cost-effective for us to continue funding (at presumably much higher levels than currently provided) for a diminished service.

We do not envisage that it will be possible for the Executive to continue working with the SDC given the Defra decision.

Question 2: *“What impact would the UK Government funding cuts have on your work with the Sustainable Development Commission?”*

ANSWER:

The funding cuts will have a significantly detrimental effect on our work with the SDC. As stated in answer to Question 1, we do not believe that it is now possible to continue working with the SDC. To do so, it would be necessary to approve far higher levels of spending against this resource, while setting this against a backdrop of diminished service provision and the broader Comprehensive Spending Review constraints we are facing. From an operational perspective, the SDC has been instrumental in assisting the production of our new Sustainable Development Strategy, which was published in May of this year, and the development of the accompanying Implementation Plan which identifies priorities and objectives for delivery. Importantly, there was a commitment on behalf of the SDC to work closely with this department to help deliver many of the strategic targets included within the Implementation Plan.

Clearly, this is now no longer possible. We are in the process of determining the most effective course of action to assure continuing progress against, and achievement of, these strategic targets.

Separately, we have through our Statutory Duty in relation to sustainable development, a duty to ensure public authorities have due regard to sustainable development in the exercising of their duties. The SDC has been useful to us in this regard, and its abolition will make this work more challenging for this department to exercise that Duty effectively.

Question 3: *“How does the Northern Ireland Executive expect to relate to the sustainable development architecture that might be reconfigured after next March? Does it intend to work with the other devolved administrations, and if so how?”*

ANSWER:

It is likely that the Executive will, like all other devolved administrations, become part of a more detached and disparate sustainable development architecture as a consequence of Defra's decision. It is, we believe, reasonable to anticipate that the loss of a central and specific repository or information and expertise will lead to increased difficulties in terms of developing and formulating cohesive approaches to sustainable development issues. We recognise, absolutely, the importance of information sharing and co-operation at national level if we are to progress the sustainability agenda and deliver long-term change.

Officials from across all administrations are currently involved in the SDC Transition Project, at which succession planning for a post-SDC environment has been discussed. Although we have yet to finalise our own precise organisational structures, there is a tacit understanding of the need for continued co-operation and information sharing between Governments and departments of Government. The means by which this may most effectively be achieved has yet to be clarified, but we would be happy to facilitate these discussions in order to reach agreement on how to do so.

Question 4: “Does the UK Government’s withdrawal of funding from the Sustainable Development Commission put at risk a consistent approach to sustainable development across the UK? If so, how?”

ANSWER:

Yes. The withdrawal of funding weakens the governmental policy development and communications infrastructure within which the SDC played a central role. While expertise may still exist in areas of Government, the abolition of the SDC will cause, in our opinion, fragmentation of knowledge and an erasing of a “corporate memory” that has been accumulated over many years.

Many of the key issues concerning sustainable development are, by nature, long term; the existence of the SDC offered stability in this respect and provided a continuity of comment and assessment that was valuable in helping to shape and reform sustainability policies and strategies. It will be, we believe, more difficult to maintain this stability if, by necessity, work previously undertaken by the SDC is absorbed into the more generalist environments of some government departments.

Again, the challenge of retaining and utilizing as much as possible of the corporate memory bank is one that we are facing up to as we attempt to create a, credible, alternative mechanism for the delivery of our sustainability priorities and objectives.

SUMMARY:

We are disappointed with Defra’s decision to withdraw funding from the SDC. Progression and achievement of sustainable development does by its very nature, both in principle and in practice, require unilateral understanding and co-operation across and between Governments. The abolition of the SDC, does in our opinion, undermine the capability of the devolved administrations to most effectively reap the benefits of the unilateralism associated with the SDC and its functions.

We believe that the withdrawal of funding by the major sponsor *i.e.* Defra, has created a situation in which the continued function of the SDC (as an organisation operating only outside England) has been so severely diminished that it has become untenable for this department to continue to support its activities here.

11 November 2010

Written evidence submitted by Atkins Limited

NOTICE

This document and its contents have been prepared and are intended solely for the Parliamentary Environmental Audit Committee’s information and use in relation to the Consultation exercise regarding .

ATKINS Ltd assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

CONTENTS

1. About Atkins.
2. Introduction.
3. Summary.
4. Body of Submission.

1. ABOUT ATKINS

1.1 Atkins Ltd gives advice to Central Government Departments and Councils across the UK on policy implementation and how sustainable development can be achieved through a number of work streams, and particularly through the planning and delivery of infrastructure in town planning services and sustainability and the roll out of energy services including renewables and all forms of low carbon that affect the built environment, energy generation and transmission. This Atkins submission has been drafted by Atkins Planning.

2. INTRODUCTION

2.1 Some work for a future approach has already been done in this area. The OGC CESP produced a review of sustainable target measures in a paper in 2009 in which it called for a new framework for sustainable measures to which we refer the EAC. The EAC produced an excellent paper on climate change in March 2010 with many findings that Atkins Planning supports.

2.2 The DEFRA proposal to disband the SDC leaves an opportunity to embed sustainable development more deeply throughout all forms of governance by mainstreaming sustainable development principles throughout all forms of Government, Central and Local Government and all other public bodies. The work of the Sustainable Development Commission (SDC) should be carried forward and ensure that the interface between the three different elements of sustainable development, environmental, economic and social, will not be coherently addressed. Social progress in particular, which can be difficult to measure, is the most vulnerable of these three elements.

2.3 The SDC legacy of “cutting edge advice and hands-on capability building” (its own words) needs to be preserved for the future and taken further. The success of the SDC’s thought leadership should be embedded further in the policy and procurement process.

3. SUMMARY

3.1 The UK Government wishes to be able to measure and verify its commitment to becoming the “greenest Government ever”. Leadership within Government at the highest level is essential as the broad based consensus approach to implementation has not produced consistency of action or response across all levels of governance and indeed in the private sector. The reviewing role of the SDC was too weak without powers to make statutory intervention. It did not have sufficient weight in its role as “steward”. The Government may wish to account to Parliament for progress of sustainable development and report on its inter-facing elements. We suggest this could be referred to as a process of cumulative sustainable development and similar to the process of cumulative impact assessment in the environmental impact assessment process.

- We support a role for cross-government independent scrutiny of progress and a strengthening of mechanisms for ensuring implementation of targets and benchmarks to monitor progress on an annual basis.
- We would like to see a Minister responsible for Sustainable Development in the Cabinet, and one who can provide an overview of how policies and strategies promoted by CLG, DEFRA and DECC work together, and where they do not, identify tensions and how they could be addressed in future policy.
- Just as DECC now provides an Annual Energy Statement to Parliament we think DEFRA, CLG and DECC should jointly prepare a similar statement for Parliament on Sustainable Development. This could link the reported outputs of the Annual Energy Statement to environmental, economic and social progress for example. It would go beyond the examination of sustainable development in Government Departments. It could link up to important policy initiatives on sustainable communities. It would clarify the statutory function of sustainable development.
- We think there is a need for an identifiable unit within Government to generate the future road map backed by evidence and fresh innovative thinking: work it can only do if it can monitor the performance of those actively involved in the delivery of sustainable development. To date there has been a tendency to devolve responsibility to RDAs and other quangos to take leadership in the area of implementation for this area. Overall we believe they have proved to have limited influence in central Government although regional authority policy possibly carried the most practical weight in terms of ensuring some aspects of sustainable development roll out—at least in the built environment and with social progress.
- We believe the SDC lacked influence because it did not have statutory powers and could not actively intervene in the statutory process, such as the planning process.
- We require more working models of sustainable development in action. The future body could concentrate on behaviour change especially with regard to energy and waste. It could work on major policy areas—gaining acceptance of new waste disposal and warming of home methods for example.
- We would support the creation of cross-departmental body to integrate the implementation of sustainable development, reporting to Cabinet and the Government and one which will perform a role that will ensure that the former functions of regional bodies are performed. A body (whatever its constitution) should advise and direct local authorities on methods to achieve sustainable development. It should also promote new practises on a world stage.
- A new statutory body requires an enabling role in terms of policy implementation and should assist with the process of public consultation to gain greater acceptance of the changes society needs to take in order to adapt to more sustainable lifestyle choices.

- We support the retention of targets such as N186 and N188. We suggest there should be other targets in relation to economic, environmental and social targets and that these could be “bundled” together for the purposes of policy monitoring. Government can then draw on the results to monitor progress and its own policy direction. That would feed into an Annual Statement for Parliament.
- We think there is wastage generated by the bureaucracy of the procurement process which is not economically sustainable. We also have concerns about the way in which sustainability of private bodies bidding for contracts is weighted as this is not transparent.
- The SDC was well served by specialists who raised awareness of issues and advised Ministers within Government; however the organisation possibly lacked a strategy regarding the integration of issues to articulate where multiple beneficial outcomes could be achieved, where the costs and benefits (specifically intergenerational trade-offs) inherent in policy or other decision-making would lie within society, and critically assessing the assumptions underlying Government’s vision and strategy for sustainability.
- Sustainability and resource efficiency create business and growth. Examples of the kind of businesses and jobs needed to service the demand for green savings include energy auditing and advice, retrofitting three million London homes, creating district heating, power and cooling systems and refuelling infrastructure for low carbon vehicles and renewable energy production. The Government will need to monitor economic growth stimulated by Green Opportunities.
- The financial sector could be involved in this. It could engage in actions relating to corporate social responsibility and should be independently monitored. The local authority remit includes statutory duties regarding sustainable development but in this time of financial austerity it seems appropriate for the task to be extended to the Financial Services Authority (or successor body) and the banking sector.

4. OUR RESPONSE TO THE CONSULTATION:

How can mechanisms to ensure the sustainability of Government operations, procurement and policy-making be improved and further embedded and mainstreamed across Government departments?

4.1 We have separated the response to policy and procurement as we think they should be treated separately.

(i) The challenge of sustainable development in policy

4.2 Sustainability is an inter-disciplinary (beyond multi-disciplinary) exercise and successful implementation depends on Government and Parliament understanding the shape and colour of the “big picture” and how specific contributions contribute to the big picture, so that they are not left as single issue topics.

4.3 One model for its dissemination has been through the tier of regional governance, especially through policy making in Regional Spatial Strategies and more lately Regional Strategies. This policy formed part of the Development Plan and was material to decision making for strategic planning schemes. Through this tier of regional planning we expected to see sustainable development making a qualitative difference to the planning of major infrastructure such as energy, transport and housing delivery, for example. The role of the regional tier was particularly important to the Development Plan because local authorities on these topics particularly looked to the regions to provide the guidance that effectively sought to impose and achieve national and sometimes EU targets. Without the regional tier we expect the implementation of sustainable development to be piecemeal, occupying a smaller stage.

4.4 Many local authorities lack the skills and budget to understand what they must do to contribute and deliver the “big picture”. Regional authorities commissioned evidence based papers to provide research and findings for the future planning of infrastructure within the context of the Development Plan. The provision of this information requires specialist skills. These findings often affect policy and future planning, and the skills required to arrive at long term implementation cannot often be readily funded within local authorities. We do not expect them to be in the near future and the challenge for the localism agenda is how it will ensure that there continues to be a system in place that secures the mainstreaming of sustainable development in all aspects of policy. For example, the implementation of planning permissions and monitoring of carbon emissions from new developments is now feasible through the use of sophisticated carbon tools—more could be done to make a provision that the planning permission must achieve a certain carbon target over say, a ten year period so the sustainability of a permission gets a scoring and an enforcement mechanism to control breaches relating to carbon thresholds could be created.

4.5 Planning for infrastructure is more than just planning at a regional level—it should be a truly spatial activity that integrates the goals of sustainability across a number of sectors. Research shows implementation of planning and climate change reforms is patchy and more joined up working is needed. In the draft policy PPS 1 Supplement 2010 it clearly stated that climate change in the then Regional Strategy should be on an equal footing with housing and economic development (an example of joined up sustainable development) . The Regional Strategy would have set the plans in place for a decentralised energy supply—so relieving LPAs of some of the burdens of target implementation. The mechanism for its replacement in the localist agenda is unclear.

4.6 Local Economic Partnerships have been relieved of targets and the future role of National Indicators which are so important for energy have not been set out. We therefore advocate long term support for current regional energy “agencies” where they exist and support for new bodies that address these cross county/ cross-Council concerns. We do not think that local authorities have sufficient skills, resources and experience to devolve energy policy without substantial support. We say this from our experience in dealing with renewable energy applications and the roll out of low carbon development.

4.7 In terms of regional policy succeeding we know that the London Region has been influenced by the findings of the Sustainable Development Commission; in particular through the London Plan which has successfully:

- **increased the numbers of affordable housing** in many strategic housing developments to 35% or more (see the Annual Monitoring Reports from the GLA) so contributing to the housing pool in London for the less well off and securing housing for essential key workers required for London’s world city status; in so doing affordable housing has also helped to regulate pricing in certain sectors of the housing market to some degree.
- **Increased the production of low carbon and renewable energy production** with the application of mechanisms such as the Merton rule (achieving a reduction in carbon dioxide emissions of 10% from on site renewable energy generation in new buildings); although Atkins believes that the formula for low carbon development needs to change and move to a whole life carbon analysis, the Merton rule triggered acceptance of the requirement for a low carbon policy in the private housing and commercial sectors. GLA policy and strategy has been influential in the grant of planning decisions with respect to carbon output as research from the **London Southbank University Report 2009** details. This shows that the London Plan has been successful in getting developers to go much further than basic requirements under building regulations to incorporate sustainable measures and cut carbon. The carbon savings being secured from developments has increased from an average of 29% in 2006 to 34% by mid 2009. The study shows that setting challenging targets has successfully driven developers to reduce their carbon emissions and the planning system has been responsible for delivering tangible targets.
- **Improved the quality of design** at masterplan and site brief level affecting the built environment across a range of typologies. Working with Design for London and the CABE Design Review Panel, London boroughs have improved design quality evidenced by improved housing standards, public buildings and amenity spaces around London. Similar evidence can be found in other parts of the country.

4.8 We do not believe that these achievements would have been made without a Mayor of London and the specialist support teams he had in place to push through these policies and their respective implementation. We suspect that political divisions amongst London Boroughs could not be overcome in the name of sustainable development because it is a “big picture” feature of policy. What it shows is that Governance structures **need specialist support** with the implementation of complex policies that embrace sustainable development. Such support is required at all levels of governance. The new localism agenda needs to be supported by a level of strategic planning to address the nation’s most pressing issues

Sustainable development in the built environment

4.9 We note that CABE will not continue to function after March 2011. However, we would urge Parliament to ensure that some of its functions with respect to the safeguarding of sustainable development for the built environment continue. For example it is sometimes difficult to measure the benefits of its enabling role in terms of improving the role of consultation and the value of design but its efforts have proved to be good value for the public purse. One example is the White City Westfield development in Bourbon Lane which provided affordable housing for the Octavia Housing Association and which was achieved through a design competition with the help of CABE design review skills. The housing development that was built as part of the Shepherd’s Bush Westfield complex is written up here: <http://www.cabe.org.uk/case-studies/bourbon-lane>

Understanding sustainable development in the mix

4.10 All new development should now be low carbon development. This has implications too for transport, waste planning and water management. The arm of Government responsible for sustainable development could, for example, ensure that non-energy developments do not prejudice substantial development that could take place for renewables.

(ii) Procurement

4.11 In its provision of consultancy services, Atkins is affected by the public procurement process in every aspect of the work it performs across the EU and the UK, (and indeed in other parts of the world where UK practice is required to be copied).

4.12 The mechanisms for achieving sustainable development can be raised in the procurement process and we have seen some Councils scoring consultancies on their own sustainable practices as part of the quality control procurement monitoring exercise. Atkins has actively engaged in this process but it is not clear to us

how that affects scoring in the commissioning process. More transparency is required from public bodies about the criteria private sector organisations should meet. An understanding about its weighting in the procurement process needs to be disseminated.

4.13 Greater consistency of approach regarding Councils' own internal application of sustainable development and how they expect partners to engage with it is required. We think the process of thought leadership in this area possibly comes from the interplay of the public/private engagement process and this should be encouraged with some form of official recognition. A successor body to the SDC could adopt a brokerage role in promoting new practices and procedures.

4.14 We think the procurement process could be simplified and shortened. Systems of registration dealing with the administrative aspects of procurement can be centralized (a model used by the GLA/LDA in CompeteFor for example and by the London Borough of Newham). We would recommend a Standard Application Form that all Councils can use and then supplement for bespoke issues if required so there is greater consistency and uniformity of approach across the procurement process.

4.15 Government should support voluntary forums for dialogue between the private and public sector such as the newly formed Regeneration UK. The Government's "big society" initiative should provide funding for linking initiatives between the private and public sector.

In formulating a future architecture for sustainable development in Government, how can it take on board wider developments and initiatives (e.g. to develop "sustainability reporting" in departments' accounts) and the contributions that other bodies might make (e.g. Centre of Expertise in Sustainable Procurement)?

4.16 The major challenge is for Government to understand how the interplay between the various topic strands of sustainable development plays out—something which is particularly relevant to Government in an era of cut back.

4.17 Dedicated sustainability "champions" (who have a good understanding of the inter-disciplinary nature of the concept) operating at key points within Government, with recourse to expert support (through universities and expert bodies for example), may be a more effective strategy to embed sustainability into Government departments, rather than have an expert within every Government department take on the role of sustainability "champion" as an adjunct role. However, it will be important to have sustainability "stewards" within Departments that operate as points of contact and serve to "translate" the function of the Department into sustainability terms. Within Cabinet there is a requirement for a defined role to contribute to the role of thought leadership in government.

4.18 Public bodies and organisations from Councils, the HCA, the Carbon Trust, the Carbon Hub, to organisations working in the private sector like Atkins and other infrastructure/environmental consultancies are key to the delivery of public sector aims and objectives. Some form of reporting mechanism needs to be set up with measurable outputs which should actively encourage organizations to provide feedback on particular challenges and achievements associated with sustainable development in order to provide best practice case studies and methodologies.

Was the SDC successful in fulfilling its remit? Which aspects of its work have reached a natural end, or are otherwise of less importance, and which remain of particular continuing importance?

4.19 The weakness of the SDC in our view is that it did not have a statutory function or statutory powers to engage in the planning process.

4.20 In addition sustainable development is referred to in a number of town planning statutes but it is not defined in those statutes. So the result was that the SDC body did not have a statutory duty to intervene with the statutory process of planning, a process which enables the delivery of sustainable development. We are aware that the lack of definition has generated tensions around its interpretation. e.g. its role in the future of the draft London Plan policies.

4.21 We think that a successor body and/ or Government Department could actively intervene in the delivery process and that the case for that is overwhelming now that the regional tier of governance through Regional Spatial Strategies has been removed.

4.22 A "rich" concept of sustainability is required to provide the narrative necessary to drive sustainability through all levels of Government and move away from a single-issue focus; the introduction of dedicated sustainability champions to direct the "big picture" and support "stewards" within Departments and also have a role in auditing sustainability reporting may provide the necessary facilitating structure within Government.

4.23 In general, the concept of sustainability needs to be improved and disseminated to all levels of Government so that there is a common understanding of the richness of the concept throughout; sustainability is not just about responses to climate change, biodiversity and equal access issues. Single issue targets provide a valuable way of measuring progress (and their retention in energy must be kept for example to ensure compliance with the Low Carbon Transition Budgets) but is limited. The concept needs to be translated into a working model that is sufficiently suited to the main functions of Government, such as procurement, service-delivery and policy-making.

4.24 The basis for a future architecture for sustainability is a step change in understanding the rationale for sustainability as a way of working within Government; and a scheme of penalties and incentives to enforce the processes that aim to integrate sustainability within operations and achieve the desired outcomes.

OUTSTANDING QUERIES

Should you have any queries on this submission please do not hesitate to contact Liz Loughran, Principal Planning Consultant, Planning Landscape & Heritage, **Atkins Water and Environment Group**, Atkins Limited, Euston Tower, 286 Euston Road, London, NW1 3AT
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4 December 2010

Written evidence submitted by the House of Commons Management Board

INTRODUCTION

1. This memorandum provides a summary of 2009–10 Parliamentary environmental performance and plans to reduce the environmental impact of Parliament. It also provides an update on the memorandum submitted by the Management Board as evidence to the Environmental Audit Committee's Sixth Report of Session 2008–09, *Greening Government*.

SUMMARY

2. In March 2009, Parliament's high level environmental strategy was developed and approved by the House of Commons Commission, the House of Lords House Committee, and the Management Boards of both Houses. A joint policy statement setting out the arrangements for environmental management and high level commitments to continuous environmental improvement was approved by the Commons Management Board in December 2009 and endorsed by the Commission in January 2010 (Annex A). The policy was subject to review by internal stakeholders and external review by the Sustainable Development Commission.

3. Whilst Parliament is not covered by Government's Sustainable Operations on the Government Estate (SOG E) framework, the 2009–10 Parliamentary environmental targets drew on the SOGE targets with specific focus on short term performance improvements. Following independent verification of baseline data and an assessment of environmental opportunities longer term, strategic targets have been set for 2010–11 and 2020–21.

4. An environmental improvement plan was developed to ensure Parliament meets its short term environmental targets. In line with good practice, departments were requested to include preliminary environmental objectives into their 2010–11 business plans.

5. At the end of 2009–10, and for the first time, Parliament reported an annual reduction in its carbon dioxide emissions resulting from energy use, reduction in water consumption and waste generation, as well as an increase in the total percentage of waste recycled.

ENVIRONMENTAL PERFORMANCE

6. In March 2009 environmental goals were proposed to the Commons Management Board. In this initial year of environmental performance assessment these goals were distinct from formal targets, in recognition of concerns regarding the validity of baseline data and uncertainty regarding the extent of the Houses' ability to improve performance. The goals for 2009–10 were drawn up after discussion with the Sustainable Development Commission, and were:

- To reduce Parliament's carbon footprint from energy and utility consumption by 3%, relative to 2008–09.
- To reduce water consumption by 2%, relative to 2008–09.
- To reduce waste generated by 5%, relative to 2008–09.
- To recycle 50% of waste generated by volume.

7. Performance against the 2009–10 goals and targets has been presented monthly to the Management Board. As part of its balanced scorecard, monthly performance data is provided on carbon emissions, electricity, gas and water consumption, waste generation and the recycling rate. This reporting process has proved robust.

8. Performance in 2009–10 was positive with all goals met and, for the first time, Parliament recorded a year on year reduction in carbon dioxide emissions. We achieved:

- A 3% reduction in absolute carbon dioxide emissions as compared to 2008–09, including a 1% reduction in weather corrected energy consumption and a 9% reduction in weather corrected gas consumption.
- A 10% reduction in water consumption per m² of estate area, as compared to 2008–09.
- A 13% reduction in waste generated per person as compared to 2008–09.

- A 56% waste recycling rate.
- Further details of 2009–10 performance are shown at Annex B.

9. The House continued in its aim to source electricity from renewable sources to the maximum available, and over 99% of the electricity used is from green tariffs. However, to better reflect changes in energy efficiency rather than purchasing, average carbon factors are used for the purposes of reporting our emissions from energy use.

FUTURE TARGETS

10. Parliament's environmental impacts were identified and prioritised at staff workshops in summer 2009. The significant environmental impacts were identified as energy consumption, resource use, waste generation, pollution and wildlife management. Parliament's policy and strategy are based on the management of these areas. To ensure that the correct focus and prioritisation were applied, the policy and strategy were subjected to DEFRA's Stretching the Web tool³⁰ which positively confirmed the approach being taken.

11. Following independent validation of baseline performance data and completion of an environmental opportunities assessment in 2009–10, short term (2010–11) and long term (2020–21) targets, based on wider UK commitments, best practice and Parliament's operating arrangements, have been set and approved by the Management Board and the Commission (and by the Lords Management Board and House Committee). To provide assurance of the robust nature of Parliamentary environmental performance data and in line with best practice, independent validation was sought for our previous baseline data (1999–2000), and 2008–09 data (new baseline). The successful validation of the 2008–09 data provided assurance that this could be effectively used as a baseline year for short and long term targets. Data for future years will be subjected to the same level of independent validation. These new targets include:

- To reduce carbon emissions (resulting from energy consumption) by 7% by 2010–11 and by 34% by 2020–21, relative to 2008–09.
- To reduce water consumption by 12% by 2010–11 and by 25% by 2020–21, relative to 2008–09.
- To reduce the volume of waste generated by 10% by 2010–11 and by 25% by 2020–21, relative to 2008–09.
- To recycle 60% of waste generated by weight by 2010–11 and 75% by 2020–21.

The full list of 2010–11 Parliamentary Environmental targets is set out in Annex C.

12. Looking forward, the House recognises that improving performance against these targets requires not only physical changes to the fixed assets of the Parliamentary Estate, but also behavioural change of those who use the Estate to achieve more sustainable outcomes. Work to develop a strategy to achieve this, which will provide further reductions in environmental impact of Houses' activities, continues.

EXTERNAL COMMUNICATIONS

13. In 2009 Parliamentary environmental performance was reported publicly for the first time as a memorandum submitted to the Commons' Environmental Audit Committee as part of their Greening Government inquiry. This provided a summary of Parliament's environmental performance in 2008–09 and plans to reduce impacts further. As part of the environmental policy statement, the Houses have agreed to report publicly on environmental performance in accordance with environmental and financial reporting best practice.

LOOKING FORWARD

14. The Management Board continues to recognise that the activities of the House of Commons have a significant environmental impact. The 2010–11 Corporate Business Plan recognises the expectation that we should improve our environmental performance, with a strategic objective of increased and demonstrable value for money and environmental sustainability in the services we deliver.

15. The recently introduced Carbon Reduction Commitment Energy Efficiency Scheme (previously known as the Carbon Reduction Commitment) requires public and private organisations to report on their carbon emissions. Whilst Parliament is not covered by the scheme, the Finance and Service Committee have expressed an interest in Parliament mirroring the requirement to report annual carbon emissions publicly. It is currently proposed that this will be completed in 2010–11 by reporting in line with the recently formalised HM Treasury Guidance for Government Departments on Sustainability Reporting³¹ after the end of the current financial year.

16. The 2010–11 environmental improvement plan, supporting the delivery of the 2010–11 Parliamentary targets, is based on the output of an independent, Estate-wide environmental opportunities assessment. Budgets have been approved for the improvement actions identified in the plan and additional staff resources allocated to the House's Environment Section.

17. The 2010–11 environmental improvement plan will further focus efforts on improving energy efficiency and reducing carbon emissions through modifications to the building management system, voltage optimisation

³⁰ <http://stretchingtheweb.defra.gov.uk/>

³¹ HM Treasury, Public Sector Annual Reports: Sustainability Reporting. June 2010.

and transformer tapping, continuation of the successful lighting replacement programme, server virtualisation, a behavioural change programme and a pilot of roof insulation materials suitable for use within heritage buildings such as the Palace.

Annex A

ENVIRONMENTAL POLICY STATEMENT

INTRODUCTION

Both Houses are committed to improving the sustainability of their activities and operations and leading by example, for the benefit of the environment and society as a whole.

This policy statement applies to the activities of both Houses of Parliament and Parliamentary ICT. It outlines Parliament's priority actions to deliver sustainability. Sustainability and environmental improvements are to be integrated into business planning and decision making to ensure that sustainability is not separate from core business but forms part of a balanced overall strategy to achieve Parliament's goals and objectives.

Parliament already seeks to observe the wider principles of corporate responsibility, of which environmental sustainability is one aspect; for example maintaining the heritage and integrity of the Parliamentary estate, ensuring the highest levels of staff and Member welfare, ensuring people are treated fairly and inclusively, promoting public understanding of the work and role of Parliament and procuring goods and services in a fair manner within procurement rules, including fair trade products where appropriate. Parliament will focus on environmental improvement in the immediate future as the area of greatest opportunity and potential impact.

The Clerk of the House of Commons and the Clerk of the Parliaments are responsible for environmental management by their respective House Services. Strategic environmental management and responsibility for the implementation of this policy has been delegated, through the Director General of Facilities in the House of Commons and the Reading Clerk in the House of Lords, to the Head of Fire Safety and Environment in the Parliamentary Estates Directorate.

All managers are responsible for environmental management in their area of responsibility. All staff shall follow the principles of the policy statement to assist in meeting the sustainability commitments identified in the policy statement.

The policy statement will be communicated to all staff, Members and Members' staff. The current version of the policy statement and associated environmental strategy documents detailing Parliament's environmental arrangements will be posted on the environmental pages on the intranet. The policy statement will be made available to the public.

ENVIRONMENTAL POLICY STATEMENT

Both House Services and Parliamentary ICT are committed to working together to achieve continuous improvement of the sustainability performance of Parliamentary activities and that of their supply chains. This is wholly consistent with achieving value for money and will benefit Members, Members' staff, House staff, visitors and other members of society. Parliament aims to comply with all applicable legislation, codes and good practice pertaining to sustainability. In particular, Parliament will focus on:

- Maintaining a system and framework to manage and improve environmental sustainability performance
- Implementing an annual environmental sustainability improvement plan
- Ensuring provision of adequate resources to deliver sustainability improvements
- Securing the co-operation and involvement of staff, Members, Members' staff and the Trade Union Side in environmental management
- Improving employee environmental awareness, engagement and competency
- Reducing Parliament's environmental impacts by:
 - Reducing carbon emissions and the consumption of energy and water
 - Conserving natural resources and minimising the use of harmful substances
 - Minimising waste generation, and disposal to landfill by reuse and recycling
 - Preventing pollution and reducing emissions
 - Managing wildlife for the benefit of the Parliamentary Estate
 - Addressing climate change through adaptation and mitigation

Parliament will produce an action plan and set targets to ensure these commitments are turned into results.

Sustainability performance and effectiveness of management arrangements will be regularly monitored and reviewed. Independent assurance of annual environmental performance data will be obtained. An annual management review will be provided to the Management Boards and performance information made publicly available. Revisions to the policy statement will be submitted to the Clerks of the two Houses for their approval.

Clerk of the House of Commons

Clerk of the Parliaments

Date:

Date:

This policy is endorsed and supported by the House of Commons Commission and the House Committee of the House of Lords.

Annex B
2009–10 PARLIAMENTARY ENVIRONMENTAL PERFORMANCE

<i>Target</i>	<i>Performance</i>	<i>Commentary</i>
To deliver the action plan for Greening Parliament.	Complete	The action plan has been endorsed by the Management Boards.
To reduce Parliament's carbon footprint from energy and utility consumption relative to 2008–09	3.7% decrease	In 2008–09 absolute carbon dioxide emissions from energy used on the Parliamentary Estate were 22,184 tonnes. This reduced to 21,490 in 2009–10. The main contributor to this reduction was an improvement of 19% at Portcullis house, as a result of improvements in control of the Building Management System.
To develop an energy and utility improvement plan identifying options for renewable energy and combined heat and power generation and reducing energy and utilities consumption.	Complete	Following a programme of energy surveys and audits carried out by independent consultants, a detailed improvement plan with a series of recommended measures has been produced for each building on the Parliamentary Estate.
To review and challenge Parliament's display energy certificates with the aim of improving 2009 energy ratings	Complete	Further improvements in ratings are anticipated for 2010 with a review of the operating hours applied in calculation of the ratings to better reflect the actual pattern of building use.

<i>Target</i>	<i>Performance</i>	<i>Commentary</i>
To reduce water consumption by 2%, relative to 2008–09	4% decrease	The 4% decrease represents a reduction in the amount of water used to 309,785m ³ in 2009–10, compared with 322,393m ³ in 2008–09. In addition, a 13% reduction in water consumption was achieved at the Palace of Westminster as a consequence of the improvements to the cooling towers.
To develop a waste improvement plan identifying options to reduce waste generation and improve recycling rates.		Following a programme of waste audits, carried out by independent consultants, a detailed waste improvement plan with a series of recommended measures has been produced for the Parliamentary Estate.
To recycle 50% of waste in 2009–10	57% recycled	A recycling rate of 57% was achieved in 2009–10. In addition, the weight of waste generated in 2009–10 fell by 12% compared with 2008–09. All general waste generated on the Parliamentary Estate is either recycled or diverted from landfill through disposal to incinerators generating energy from waste.
To ensure all major Parliamentary Estate projects specify environmental requirements.	Complete	All business cases for new projects require approval by the Environment Section.
To achieve BREEAM “Excellent” rating for new builds and major refurbishments and “Very Good” rating for major refurbishments of heritage/ listed buildings.	Achieved	The design for the refurbishment of the Millbank Island site achieved a Very Good BREEAM rating. This was the only project that required a BREEAM assessment in 2009–10.
To identify the threats and opportunities of climate change on Parliament’s activities and services.	Complete	An assessment of the impact of climate change has been carried out and forms part of the Risk Register for the Parliamentary Estates Directorate

Annex C

2010–11 PARLIAMENTARY ENVIRONMENTAL TARGETS

Carbon, energy and utilities:

- To reduce carbon emissions by 7% by 2010–11 and by 34% by 2020–21, relative to 2008–09.
- to source a maximum volume of electricity from renewable sources.
- To reduce water consumption by 12% by 2010–11 and by 25% by 2020–21, relative to 2008–09.

Waste:

- To reduce the volume of waste generated by 10% by 2010–11 and by 25% by 2020–21, relative to 2008–09.
- To recycle 60% of waste generated by weight by 2010–11 and 75 % by 2020–21.

Procurement and projects:

- To ensure all major Parliamentary Estates projects specify environmental requirements.
- To achieve BREEAM³² “Excellent” rating for new builds and major refurbishments and “Very Good” rating for major refurbishments of heritage/ listed buildings.

Climate change adaptation:

- To identify the threats and opportunities of climate change on Parliament’s activities and services.

10 December 2010

³² BREEAM—Building Research Establishment’s Environmental Assessment Method

Written evidence submitted by Amyas Morse, Comptroller and Auditor General, National Audit Office

Thank you for your letter of 23 November seeking my views on the suggestion that the National Audit Office might assist your Committee, should you decide to take over some or all of the watchdog role currently undertaken by the Sustainable Development Commission whose funding from Defra is being withdrawn.

You kindly acknowledged in your letter the support we have provided to the Committee over many years and we hope to continue to assist the Committee with its inquiries. Should the Committee take on a broader remit, we would seek to support it across the range of its activities where we can provide relevant skills and knowledge. I am not, however, in a position to enter into binding long term commitments, or to take on functions which the Government has decided it should no longer fund. Accordingly, the Committee's decision about what role it takes on should not be predicated on receiving additional National Audit Office support for this purpose. I will ask my teams to continue to consider each request for assistance individually, to determine how we could provide support, and to assess whether we have resources available to meet the Committee's requirements.

I am copying this letter to Margaret Hodge, Chair of the Committee of Public Accounts.

3 December 2010

Further written evidence submitted by Richard Lochhead MSP, Cabinet Secretary for Rural Affairs and the Environment, the Scottish Government

Thank you for your letter of 23 November asking about the UK Government's announcement that it would cease funding of the Sustainable Development Commission.

The Secretary of State for the Environment, Food and Rural Affairs Caroline Spelman and I spoke about her plans to review the future of the SDC as part of a wider meeting on 23 June. She wrote on 14 July to advise of her plans to announce the withdrawal of funding from the SDC and seeking agreement to wind up the organisation.

I replied on 20 July to reserve the Scottish Government's position on the wind-up proposals, to provide time to consider the options and implications for Scotland.

We would rather that the United Kingdom Government had not decided to withdraw funding given the impact on the viability of the SDC in Scotland. The Scottish Government has now announced that the SDC in Scotland will not continue as a separate entity although we will maintain certain of the activities it currently delivers. The Scottish Government will continue to draw on sustainability advice, scrutiny and challenge from a number of different bodies, as summarised in the Scottish Parliamentary question and answer attached for your records.³³

I hope this is helpful.

15 December 2010

Further written evidence submitted by the Office of the First Minister and Deputy First Minister, Northern Ireland Executive

Thank you for your letter of 23 November regarding the above. Clearly there is some ambiguity between the evidence sessions noted in your letter about the nature of consultation on the Defra decision to withdraw funding from SDC.

We were not consulted by Defra with regard to its decision to withdraw its funding from SDC. We have no record or recollection of any contact from Defra in this regard. The Secretary of State for Environment informed us by letter on 14 July 2010 that she intended, on 22 July 2010, to announce her decision to discontinue Defra funding and seeking our co-operation in winding up the SDC Company. As mentioned in the evidence we have already supplied to the Committee that we were disappointed by this decision. We did not, and have not, provided any written or oral indication of our support for the decision.

We do recognise that the withdrawal of Defra funding from SDC means that it is impossible for it to continue as a viable organisation. Therefore, we are co-operating in the winding-down procedure, through representation on the *SDC Transition Project Board*, with the intention of facilitating what we acknowledge to be a very difficult and traumatic process for all SDC staff involved.

³³ Not printed statement available at <http://www.scottish.parliament.uk/business/pqa/wa-10/wa1125.htm>

We hope this provides the clarification you need. We are copying this letter to the Secretary of State for Defra, First Minister of Scotland and First Minister of Wales.

15 December 2010
