

# Policy and Sustainability Committee

10.00am, Tuesday, 29 March 2022

## Consultation on NHS Scotland Climate Emergency and Sustainability Strategy – Council response

Executive/routine  
Wards  
Council Commitments

### 1. Recommendations

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- 1.1 To note the response to the [draft Climate Emergency and Sustainability Strategy 2022 to 2026](#) consultation (attached at appendix A), approved by the Executive Director of Corporate Services in consultation with the Leader and Depute Leader under urgency provisions set out in A4.1 of the Committee Terms of Reference and Delegated Functions so as to meet the consultation deadlines

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## Consultation on NHS Scotland Climate Emergency and Sustainability Strategy – Council response

### 2. Executive Summary

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- 2.1 The Scottish Government and NHS Assure have developed a [draft Climate Emergency and Sustainability Strategy 2022 to 2026](#) (the NHS Strategy) public consultation. The consultation closed on 10 March 2022 and it was not possible for Committee to consider the response prior to submission.
- 2.2 The Council's submission to the consultation is provided in appendix A and has been agreed by the Executive Director of Corporate Services in consultation with the Leader and Depute Leader under urgency provisions set out in A4.1 of the Committee Terms of Reference and Delegated Functions so as to meet the consultation deadlines.
- 2.3 In preparing the response, officers have drawn on the 'calls to Government' set out in the [Edinburgh 2030 Climate Strategy](#) and ensured the consultation response is consistent with the core messages communicated in relevant [recent consultation submissions by Council related to sustainability](#). These messages include greater use of place-based policy and funding approaches; innovative finance models; and supporting local empowerment and decision making to deliver net zero.

### 3. Background

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- 3.1 The draft Climate Emergency and Sustainability Strategy 2022 to 2026 (the NHS Strategy) sets out a five-year plan for NHS Scotland and its boards to cut greenhouse gas emissions and become environmentally stable. It identifies five priority areas that will be delivered by Health Boards working in partnership with Integrated Joint Boards, Community Planning Partnerships and Regional and Local Resilience Partnerships:
  - 3.1.1 Sustainable Buildings and Land
  - 3.1.2 Sustainable Travel
  - 3.1.3 Sustainable Goods and Services
  - 3.1.4 Sustainable Care
  - 3.1.5 Sustainable Communities

- 3.2 The NHS Strategy brings forward its net zero target from 2045 to 2040 and sets out the clear and pressing need to act to address the climate emergency and loss of biodiversity. It recognises that many of the actions needed in response to the climate emergency and the environmental crisis have positive health impacts and that climate emergency, loss of biodiversity, sustainability, health and health inequalities are inextricably linked.
- 3.3 The NHS Strategy's sets a series of aims for the service and identifies just transition and delivery of the United Nations Sustainable Development Goals as core principles for the strategy's delivery. Delivery is focussed on partnership working including with local communities, local authorities and other public bodies, third sector organisations and suppliers and with Integrated Joint Boards, Community Planning Partnerships, and Regional and Local Resilience Partnerships.
- 3.4 The NHS Strategy also recognises the NHS as a having a role as an anchor organisation where it can offer greater community benefit through working more closely with our local partners to use our buildings and spaces for social benefit, providing opportunities for recreation and physical activity, improving access to high quality outdoor space, making local sourcing possible, and reducing environmental impact.
- 3.5 NHS Lothian has made a substantial positive contribution to the development of the [Edinburgh 2030 Climate Strategy](#). This contribution has included committing to strategic partnerships (such as the Energy Efficient Public Buildings Partnership and the City Heat and Energy Partnership) and taking city leadership on strategic actions (including working with other public sector partners to help them coordinate and enhance natural assets across operational estates).

## 4. Main report

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- 4.1 The response to the consultation welcomes the Strategy and supports the ambition and focus on relationships between climate change and human health. The response acknowledges and supports the NHS Strategy's comprehensive approach that addresses key emissions challenges while responding to wider needs such as biodiversity, a just transition, and health inequalities.
- 4.2 Key areas of feedback raised in the Council's response to the consultation are summarised below
- 4.2.1 Net Zero targets - The NHS Strategy has brought its net zero target forward to 2040 from 2045. The Council response encourages the NHS Strategy to consider how it can go further and work in partnership with cities to meet the critical need for accelerated action by cities if Scotland as a whole is to meet its emissions reduction target.
- 4.2.2 Local board empowerment – the consultation response welcomes discussions between the Council, NHS Scotland, NHS Lothian and Scottish Government on how funding and policy decisions can be aligned to better support empowered local decision making.

- 4.2.3 Joint estates retrofit – the Council response recommends strengthened actions in the NHS Strategy to make stronger commitments about working in partnership with other local authorities and public sector partners to plan, deliver, and fund joint retrofit programmes.
- 4.2.4 20-minute neighbourhoods – The Council response encourages a bolder and more citizen focussed approach to 20-minute neighbourhoods. Greater recognition that 20-minute neighbourhoods offer an opportunity to ensure our services meet the holistic needs of citizens and communities and to jointly redesign our services to meet net zero.
- 4.2.5 City heat and energy partnership – the Council response finds that the NHS Strategy needs to provide greater support for NHS boards to fully participate in co-development and co-delivery of local heat and energy solutions.
- 4.2.6 Co-ordinated approached to drawing down national funding streams – the Council response identifies the NHS Strategy’s reliance on existing funding sources and approaches. The Council response highlights a gap in the NHS Strategy where stronger actions across it are needed to explore the potential for more collaborative approaches to place-based and local-led capital investment.
- 4.2.7 Developing new finance models – the Council response urges further consideration of how the strategy incorporates the development of new finance models and investment approaches into the NHS Strategy.
- 4.2.8 Offsetting – the Council response welcomes future engagement with NHS Scotland and Lothian to on a developing a citywide approach to offsetting

## **5. Next Steps**

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- 5.1 Council officers will continue to work with Scottish Government, NHS Scotland and NHS Lothian on the issues raised through the consultation processes and will report to committee on relevant progress as necessary.

## **6. Financial impact**

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- 6.1 There are no financial impacts arising as a result of this report.

## **7. Stakeholder/Community impact**

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- 7.1 There are no direct stakeholder/community impacts arising as a result of this report.
- 7.2 The Council response raises issues about ensuring public sector services are designed around meeting the needs of local citizens and communities (summarised in the main section of this report). The Council response raises relevant concerns related to carbon impacts, adaptation, climate change, and sustainable development.
- 7.3 Through continued engagement with Scottish Government, NHS Scotland and local boards, officers will continue to raise any community impacts, equalities, health and safety, governance, compliance or regulatory implications; and carbon impacts, adaptation to climate change and sustainable development.

## **8. Background reading/external references**

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- 8.1 Scottish Government and NHS Assure, [draft Climate Emergency and Sustainability Strategy 2022 to 2026](#), November 2021.

## **9. Appendices**

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- 9.1 Appendix a – Council response to NHS Scotland Climate Emergency & Sustainability Strategy 2022- 2026 Scottish Government consultation.

# NHS Scotland Climate Emergency & Sustainability Strategy 2022- 2026

## Scottish Government consultation

City of Edinburgh Council response  
10 March 2022

### 1. Introduction and summary

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- 1.1 In December 2021 the Council published the Edinburgh [2030 Climate Strategy](#) which sets out a city-wide approach to deliver a net zero, climate ready Edinburgh. The 2030 Climate Strategy has been developed with partners within the city who have a duty to transition to net zero, have significant city emissions footprints, and the power and budgets to make impactful change.
- 1.2 NHS Lothian has made a substantial positive contribution to the development of the Edinburgh 2030 Climate Strategy. This contribution has included committing to participation in strategic partnerships (such as the Energy Efficient Public Buildings Partnership and the City Heat and Energy Partnership) and taking city leadership on strategic actions (including sharing learning with other public sector partners to help them coordinate and enhance natural assets across operational estates). NHS Lothian's collaborative approach with the Council and other city partners has resulted in a comprehensive 2030 Climate Strategy that focuses on the connections between climate change and human health, including the opportunity for improvement to population health and wellbeing that climate change action can provide.
- 1.3 The Council welcomes the NHS Climate Emergency and Sustainability Strategy (NHS Strategy) and supports the NHS Strategy's ambition and approaches, particularly the focus on the impact of climate change on human health and the need to rapidly reduce global emissions. The Council acknowledges and supports the NHS Strategy's comprehensive approach to key emissions challenges while responding to wider needs such as biodiversity, a just transition, and health inequalities.
- 1.4 The NHS Strategy is well aligned with the thinking and approaches that have been established through the Edinburgh 2030 Climate Strategy, and its focus on the importance of partnership working is particularly welcomed.

### 2. Strengthening the NHS Scotland Climate Emergency & Sustainability Strategy

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#### Net zero targets

- 2.1 As noted by the Climate Emergency Response Group, if Scotland as a whole is to meet its 2045 target, our cities need to make faster progress. This means Scottish

Government needs to do more to support councils and public sector bodies that are playing their part by progressing bold and ambitious actions.

- 2.2 The NHS Strategy has brought its net zero target forward from 2045 to 2040, which is an important and welcome step. The Council encourages the NHS, at national and board levels, to consider how it build on its net zero target and deepen partnership working with cities to help meet the critical need for accelerated action.

### **Local board empowerment**

- 2.3 For local partnerships to have the most impact, they need to be empowered in terms of financial, policy, and governance, with devolved budgets and decision-making capability at the very local level. Local empowerment is a necessary requirement for effective collaboration on place-based approaches that will help meet the net zero challenge. Support is required from both NHS Scotland and Scottish Government to enable territorial NHS Boards to increase their participation in place-based collaboration. The Council would welcome discussions with Scottish Government, NHS Scotland, and NHS Lothian on how funding and policy can be designed more flexibly to better support empowered local decision making.
- 2.4 There is scope to consider how actions identified across the five priority areas in the NHS Strategy can be taken forward in a way that offers greater support for local decision making. The Council has a number of areas (set out in the rest of this submission) where it would like to work more closely with the NHS, which will require local boards to be empowered to make joint decisions with the Council.

### **Joint estates retrofit**

- 2.5 The Edinburgh 2030 Climate Strategy identifies a need to collaborate strategically and align investment in estates across the public sector to ensure it supports improved service delivery, improved energy efficiency, and reduced emissions. This will be progressed through a joint public sector estate retrofit programme that will create economies of scale, support local companies, and unlock the potential large scale retrofit has to signal future needs to the supply chain, stimulate targeted workforce and skills development, and create new local jobs in the city.
- 2.6 The NHS Strategy includes actions under the section 'sustainable buildings and land', that are designed to reduce emissions, build climate resilience and realise co-benefits for citizens. The Council would support the strengthening of these actions to create an enabling framework for aligning NHS, Council, and wider public sector partner budgets in these areas as part of a joint approach to sustainable buildings and land. Strengthened actions could include enhanced commitments to working in partnership with other local authorities and public sector partners to plan, deliver, and fund joint retrofit programmes.

### **20-minute neighbourhoods**

- 2.7 Both the NHS Strategy and Edinburgh 2030 Climate Strategy include references to the 20-minute neighbourhood approach. Delivering 20-minute neighbourhoods will

require ensuring easy access to local services, helping to reduce the demand for travel.

2.8 20-minute neighbourhoods offer an opportunity to ensure our services meet the needs of citizens and communities in a holistic way, and to jointly redesign our services to meet net zero. The NHS Strategy refers to planning new facilities in the community using the principles of 20-minute neighbourhoods. There is scope to work together and with other public sector bodies to develop a bolder and more citizen focussed approach, as part of wider-reaching whole-system redesign.

2.9 Bolder actions should include:

2.9.1 Ensuring partnership working at local levels with citizens, communities, businesses, and local authorities.

2.9.2 Taking joint decisions on both existing and new estates and buildings and how they are best managed and used

2.9.3 Creating opportunities for co-location of services, and joint approaches to re-purposing our estates.

2.9.4 Aligning budgets and decision making to deliver the above.

#### **City heat and energy partnership**

2.10 City growth, low levels of local renewable electricity generation, and existing energy infrastructure limits are driving the need for city-wide heat and energy generation and distribution solutions.

2.11 The 2030 Climate Strategy establishes a new City Heat and Energy Partnership with key public and private sector organisations which will be tasked with co-ordinating investments and supporting the delivery of flagship actions for the city. The partnership will develop a city-wide heat and energy masterplan which will incorporate a local heat and energy efficiency strategy and align current and future grid development to the city's energy needs.

2.12 To support success of the City Heat and Energy Partnership and decarbonised heat energy, the Council considers that the NHS strategy needs to provide greater support for NHS boards to fully participate in co-development and co-delivery of local heat and energy solutions. The NHS Strategy could do this by making clearer the roles and responsibilities and specific actions for decarbonising heat within NHS estates and the towns and cities they operate in.

## Co-ordinated approach to drawing down national funding streams

- 2.13 The NHS Strategy identifies the significant capital cost to redesigning estates and services to meet net zero and points to Scottish Government funding, NHS Scotland and local board funding as sources. The challenge of capital funding is shared across the public sector and, even with the availability of low-interest finance from the public purse, the public sector alone will not be able to meet the financial challenge presented by decarbonisation and adaptation programs.
- 2.14 National funding streams often focus on very specific objectives that don't always align with city priorities or support more holistic place-based interventions. This means partners have to invest significant time and resources in 'weaving together' multiple bids to be able to invest in a 'place' in a way that responds to the systemic challenge of net zero and the full range of that communities' needs.
- 2.15 By establishing new Climate Strategy Investment Programme Board, Edinburgh aims to align our operational and investment plans – where that makes sense – to maximise the collective impact on carbon emissions, share knowledge, skills and capacity as well as investment and operational risks and opportunities.
- 2.16 For the NHS Strategy to be able to deliver the aims sought across communities and assets and activities, the NHS Strategy needs stronger actions to explore the potential for more collaborative approaches to place-based and local-led capital investment. This needs to include the ability to devolve budgets to the very local level and to work more closely on joint approaches to procurement.

## Developing new finance models

- 2.17 The key issue the City of Edinburgh Council faces is not the availability of capital (public or private) to support net zero delivery; it is a lack of revenue to create and maintain the capacity required to develop a pipeline of investible projects to the stage and scale required to attract capital investment. In addition, collaborative planning, funding, and investment is required across public sector budgets to maximise efficiency and opportunity for approaches that deliver city-based net zero targets.
- 2.18 The Council would encourage the NHS Scotland and Scottish Government to consider how they will support working in partnership across the public sector and beyond to fund net zero transition.
- 2.19 The 2030 Climate Strategy sets plans to foster the investment potential of Edinburgh by working with partners to develop ambitious and attractive projects and proposals, and to test innovative finance models, including blended finance, and new approaches to sharing risk and reward. The creation of a Green Investment Prospectus will enable the matching of investors to suitable projects in Edinburgh. These projects include responding to major challenges, such as how to retrofit residential properties across the city and preparing the city for the effects of climate change through adaptation.

## Offsetting

- 2.20 The Council welcomes the approach of bringing emissions as close to zero as possible, as soon as possible. However, it also acknowledges that absolute zero emissions are not possible with current technology and so some residual emissions are likely to remain. This will require some degree of off-setting in order to reach net zero.
- 2.21 The 2030 Climate Strategy sets out various potential approaches to offsetting and highlights a number of key principles which will be further explored with city partners, including:
- 2.21.1 reducing emissions as close to zero as practicable should be the main priority,
  - 2.21.2 where it is necessary to offset residual emissions, there is a need to ensure offsetting schemes have robust and transparent standards of verification and meet accredited quality principles
  - 2.21.3 consideration of the geographic location of offsets (e.g local or global) and therefore of where wider co-benefits such as improved air quality are realised.
- 2.22 Getting an approach to offsetting right for the city is important. Through the Edinburgh 2030 Climate Strategy, the City of Edinburgh Council will work with city partners, including Scottish Government, to consider and agree the best approach. The Council would welcome input from NHS Scotland and NHS Lothian to these discussions.

## Deliverability

- 2.23 The NHS strategy sets out clear actions to make progress within each of the priority areas. However, it could be strengthened by including detail about who will be responsible for delivering the action including where and how territorial Boards will be empowered to collaborate on delivery with local partners. In addition, a supporting implementation plan setting out greater detail about delivery timeframes, the resource requirements to deliver the strategy, and a framework for monitoring performance would help ensure clarity on how its aims will be met and where opportunities for collaboration on delivery might be realised.

## 3. Contact details

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