

Dr G Falconer

Comments on Language Policy in the Draft Programme for Government

Thank you for the opportunity to comment on the draft Programme for Government.

My own field of interest is minoritised languages. I am currently the secretary of Holywood Irish Society and, to my knowledge, the holder of the only PhD in the world in Ulster-Scots language policy.

Irish

I was glad to see that the strategy for Irish has been decoupled from that for Ulster Scots in line with the advice of the Committee of Experts and most other informed commentators.

I should also very much like to see an Irish Language Act, since normalisation represents the only possible way of removing the language from the political arena and can alone provide a stable framework for continued progress. As an Irish Language Act was promised as part of the St. Andrews and Hillsborough agreements, I regret the fact that it has not been mentioned explicitly in the Programme for Government.

Regardless of whether an Act goes ahead, it would be of obvious benefit to the Irish language for artificial barriers to be removed, such as the legal prohibition on use before the courts and the requirement for consecutive translation in the Northern Ireland Assembly despite the employment of an interpreter, an anomaly that may constitute indirect discrimination against religious and political groups protected under section 75 of the Northern Ireland Act 1998.

Perhaps the Minister might also consider using her good offices to impress upon the BBC the need for a more co-ordinated approach to broadcasting provision for minoritised languages. There is an obvious disparity in what it does for Scottish Gaelic in Scotland and what it does for Irish in Northern Ireland, with both a national radio station and a national television station now available in the former territory. It is true that Irish benefits from spill-over from the South, but does that really discharge the BBC's obligations North of the border? Irish-speakers pay for TV licences too, and according to the census there are rather more of them than there are speakers of Scottish Gaelic.

Although the Irish language has at times been unfairly linked to politics, the nomination arrangements to the Language Body clearly constitute a form of institutionalised discrimination, since they result in a sectarian carve-up, with virtually no Unionists on the board of Foras na Gaeilge, and no Northern Nationalists whatsoever on the board of the Ulster-Scots Agency. While there is much more linguistic expertise on the Irish side (reflecting the language's more established status), the system of political nominations in general is far from ideal. All the Executive parties seem able to "talk the talk" on ending sectarianism, but the Language Body represents a clear case where they have failed, severally and collectively, to "walk the walk".

Ulster Scots

There are, as I see it, three key problems with regard to the promotion of Ulster Scots hitherto, of which the core problem is the parallel exclusion:

- a) of Northern Nationalists;
- 2b) of academic linguists; and
- c) of Scotland.

The exclusion of Northern Nationalists has happened in two ways, the first being the institutional arrangements for the promotion of the dialect, including the nomination arrangements for the language body, and the way in which Ulster Scots is commonly promoted as part of a cultural package overwhelmingly aimed at the Protestant and Unionist community. Although the nominations issue also applies to Foras na Gaeilge, the detrimental effect on Irish is far less, since Irish has no constituency of Protestant native speakers that might be alienated.

I was pleased to see that the needs of Irish and Ulster Scots will now be addressed in a way that

reflects the speech varieties' individual needs rather than any political linkage created between them. However, I cannot understand how it might benefit Ulster Scots to be promoted as the sectional interest of a particular (Ulster Protestant) ethnic tradition when its speaker numbers are so low and when such a substantial minority of speakers (at least 25% according to NILTS 1999) follows another (Irish Catholic) tradition.

I therefore suggest splitting the Ulster-Scots strategy into two separate initiatives dealing with dialect and culture. Such an approach would have the added benefit of ring-fencing funds for Ulster-Scots dialect, which have hitherto often been diverted to other forms of culture, many of them confessionally distinct and some of them commonly viewed as sectarian. I do not believe that it is beyond the capability of Northern Ireland to promote Ulster Scots in a way that retains and even strengthens the affection of Catholic and Nationalist speakers vital to its long-term survival. On a related front, it would be extremely useful to introduce some form of hypothecation to ensure that a majority of Ulster-Scots Agency funding goes on language. Perhaps that could even be done by means of a protocol or memorandum without requiring any legislative change. It is a strange situation where one half of the language body spends only a small part of its funds on language.

I further suggest splitting the Language Body into two distinct entities to deal with Irish and Ulster Scots, to which Nationalist and Unionist parties alike would be both enabled and expected to nominate. I realise that reform of this kind would require both cross-community support in Northern Ireland and the agreement of the Irish Government (perhaps including a reduction in Southern participation on the board of the Ulster-Scots Agency). However, there has now been over a decade of documented failure, and the situation is very urgent. I also believe that such reform would have the potential to improve the internal governance of the language agencies.

One of the constants in the relationship of the state with Ulster Scots has been the lack of qualified input from academic linguists with expertise in Scots (as opposed to literary academics, academic linguists with expertise in English or other languages, and amateur linguists). That has led, among other things, to attempts to devise a normative orthography almost without regard to the actual phonology of the dialect, its attested literature, or the needs of users. However, perhaps the chief result has been the apparent enshrinement as an article of public policy the bizarre contention that Ulster Scots is not, as academia believes, part of Scots. Far from settling any non-existent "debate" on the matter, that simply raises a whole new series of questions about scientific relativism in the face of political blackmail. Given the very low numbers of speakers of Ulster Scots (c. 35,000) according to NILTS 1999) and the fact that differences from the main Central Scots variety (c. 1million speakers according to GRO Scotland 1996) are so very slight, the logic of developing a common orthography based on that of traditional Modern Scots is inescapable. Contact should therefore be made with bodies in Scotland as a matter of urgency.

For that reason, I am also sceptical of any plans for an "Ulster-Scots Academy". If any new body were based on the *Académie Française* or the *Fryske Akademy*, its role would be to standardise Ulster Scots separately from Scots in Scotland. That would be an extremely ill-advised step with obvious potential to do more harm than good. I am also concerned that the various implementation or scoping groups established by DCAL may in some cases run the risk of following in the footsteps of the Ulster-Scots Agency in promoting the dialect alongside confessionally distinct phenomena, i.e. "history" and "heritage and culture". Having been a keen observer of how Ulster Scots has been promoted in recent years, I am firmly of the view that no organisation tasked with language promotion should have any wider ethno-cultural role whatsoever. The concept of an academy itself is ill thought out. There is an obvious danger of duplicating the work of the Ulster-Scots Agency, so that it would be a good idea to abolish — or not proceed with — one or the other. I stress that I have no objection to any organisation collecting, disseminating or studying language or literature in a confessionally neutral manner, or to arts-based language projects.

A further problem with regard to Ulster Scots is the unrepresentative nature of certain key organisations. The Ulster-Scots Agency seems to have accorded special status to the Ulster-Scots Language Society, but that is not the only language association, and the Ullans Academy for one seems rather more broadly based. Either the Agency should accommodate the Ullans Academy, the Ullans Speakers' Association, and the other groups, or the Language Society should not be housed in the Agency building. There is also a need for transparency regarding those who make or benefit from decisions on Ulster Scots. A surprising number of individuals have a personal, familial or social connection with a single Orange Lodge, LOL 688,

or with the British-Israel World Federation, or with both, and it is only right that such links be declared in order to avoid any — no doubt false —imputation of impropriety.

Thank you once again for the opportunity to comment on the Executive's plans. I hope that the foregoing remarks have been useful.



Brendan Hegarty
B.Sc. F.C.A.
Chief Executive

9th February 2012



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Dear Sir or Madam,

**Re: Consultation on Draft Programme for Government
2011-2015.**

Please find attached the response from Fermanagh District Council which was agreed at the Council meeting on 6th February 2012.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,

Brendan Hegarty
Chief Executive.

Robert Foye M.C.I.E.H. M.I.O.S.H. M.I.Mgt
Director of Environmental Health

Robert Gibson B.Sc.
Director of Leisure, Tourism & Arts

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Director of Finance & Information Technology

Gerry Knox B.A.
Director of Technical Services

Deborah Reid F.R.I.C.S. D.P.M.S.
Director of Building Control

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DFMDFM

Draft Programme for Government 2011-2015
Response from Fermanagh District Council

Fermanagh District Council welcomes this opportunity to respond to the consultation. Council supports the response from NILGA to the consultation and wishes to provide the following additional and complementary comments.

Council is generally supportive of the commitments in the Draft Programme for Government, but has some concerns about the lack of clarity in relation to the funding committed to their achievement in either the Draft Economic or Investment Strategies, particularly in light of rising unemployment, weak growth and falling public expenditure. It is essential that the final Programme for Government delivers over-arching policy solutions and strategies which result in joined-up working between delivery agents which is critical to the achievement of cross-cutting issues. The Council would welcome a strong commitment to balanced regional development within the strategy.

Council would wish to make the following specific comments:

Priority 1. Growing a Sustainable Economy and Investing in the Future

There is a commitment to "Allocate an increasing percentage of the overall health budget to public health (DHSSPS)" however there is no similar commitment in either the Draft Economic or Investment Strategies.

Council would also recommend consideration of the following additional commitments:

1. Removal of barriers to procurement opportunities to ensure public procurement processes are straightforward and contract opportunities are open to all.
2. Secure an increase in apprenticeship opportunities for young people.
3. Refocus resources on the most effective interventions, following a review of activities designed to help people not in education, training or employment.
4. Ensure that all consumers and businesses have access to a first class digital infrastructure by working with the communications regulator, Ofcom, and with the mobile industry, to identify mobile and broadband coverage gaps and the barriers that need to be overcome to address these gaps.

In addition, Council would wish to see further recognition of the important contribution to economic growth made by the agricultural sector and would therefore recommend the following commitments be added:

5. Ensure that the needs of the farming industry within the Region are fully recognised within the UK negotiating position on future reform to the EU CAP and the Common Fisheries Policy.
6. Promote sustainable agricultural, food and fisheries industries in discussions and negotiations with other UK Administrations and the European Commission.

Council welcomes the commitment in the draft Programme for Government to

“Progress the upgrade of key road projects and improve the overall road network to ensure that by March 2015 journey times on key transport corridors reduce by 2.5% - against the 2003 baseline (DRD)” ,supported by the Investment Strategy allocation of £1,190m between 2011/12 to 2014/15 and £1,281m between 2015/16 and 2020/2021.

Council highlights the link between improvements in transport provision and infrastructure and effective integration with land and spatial planning at a local and regional level. The Regional Development Strategy identified Enniskillen as a sub-regional centre with the East/West Gateway through Enniskillen to Sligo being identified as a Key Economic Corridor. The importance of the route from Enniskillen to Dublin via Cavan represents another significant Key Economic Corridor for this region. Some improvements have been made to the A4, between Ballygawley and Enniskillen (though no by-passes have been built and the road needs considerable investment in many other places too – basically for most of the journey from Augher to Enniskillen); however, the Enniskillen-Belcoo stretch of that road is of a particularly poor standard.

Enniskillen benefits from its ‘island town’ status in some respects, but suffers from that same issue, being significantly disadvantaged in terms of transportation flows and the impact on the East/West Transport Corridor. That disadvantage is currently affecting Enniskillen as a locus for new job creation. The amount of inter-regional traffic funnelled through Enniskillen often leads to major delays which would be alleviated by the construction of the Enniskillen Southern By-pass which would also contribute to the strengthening of Enniskillen as an attractive urban tourism destination. No funding has yet been allocated for the project.

The new Acute Hospital in Enniskillen is due to open in June 2012. This is a facility, which will have 21st century technology and five theatres, with the potential to reduce waiting times to a level far below that in other regional hospitals. It will also be capable of serving patients from the Republic of Ireland. The existing roads network will become an impediment to it achieving its full potential; therefore it is essential that funding is allocated to a major refurbishment of the road network, particularly the A32 and the A4, to improve access times and journeys to the new hospital.

Transport links have major implications for the Economy, the Environment, Transport and Connectivity, and clearly indicate a requirement for investment in modern transport infrastructure in the area, provided on a cross-border

basis. It is important that there is joined up working with the National Roads Authority in the Republic of Ireland. Whilst there is an understanding of the implications of the recession in relation to spending on the roads, it is also important that the improvements already achieved are consolidated and that plans continue to reflect longer term needs. In this regard, it is important that the work on the Cherrymount Link Road is completed including its extension to the Dublin Road.

Priority 2. Creating Opportunities, Tackling Disadvantage and Improving Health and Well-Being.

Council welcomes the commitments to "Introduce and support a range of initiatives aimed at reducing fuel poverty across Northern Ireland including preventative interventions (DSD)", "Improve thermal efficiency of Housing Executive stock and ensure full double glazing in its properties (DSD)" and "Provide £40 million to address dereliction and promote investment in the physical regeneration of deprived areas through the Social Investment Fund (SIF) (OFMDFM)". However Council also has concerns about the allocation of appropriate funding to these issues as there is no specific monetary allocation in either the Draft Economic or Investment Strategies.

Council also welcomes the commitment to "Advance the relocation of the Headquarters of the Department of Agriculture and Rural Development to a rural area by 2015 (DARD)" but notes that there is no specific monetary allocation in either the Draft Economic or Investment Strategies. Council has concerns about this commitment as it implies that the entire Departmental headquarters would be relocated to a single rural area. Council's view is that it would be more appropriate to transfer the agencies of DARD to different rural locations in Northern Ireland; for instance it is Council's view that the Forestry Service should be based in Enniskillen. Council contends that the Department must show due regard to pursuing an equitable distribution of Public Sector employment opportunities, with equity in relation to the quality as well as the numbers of jobs which are re-located. The importance of a strong public sector cannot be underestimated in Fermanagh. In order to help grow our small to medium enterprises it is imperative that they develop alongside a strong public sector.

Fermanagh District Council recognises the importance of retaining public sector employment in the area and the development of the vacant Erne Hospital site will facilitate the retention of public sector employment in the area and afford opportunities for the relocation of public sector jobs to the area. Fermanagh District Council has identified this site as representing an opportunity to provide a more efficient, effective and better coordinated public service provision for Fermanagh with the potential to promote and generate economic development in Enniskillen whilst maintaining the commercial attractiveness of the town centre.

Council would also recommend consideration of the following additional commitments:

1. Support the development of low interest Property Appreciation Loans to allow low income homeowners to improve their properties.
2. Ensure the provision of multi-agency support for families who need it, tailored to the particular issues they face, through Intensive Family Support Teams and Families First, bringing together help from social services, health services, education, justice and voluntary services.

Council would have strong concerns about the achievability of the commitment to "Support people (with an emphasis on young people) in to employment by providing skills and training 114,000 cumulative (DEL) " which is supported in the Economic Strategy by a commitment to "Move 114,000 working age benefit clients into employment by March 2015" albeit without a specific financial budget linked to its achievement.

Whilst Priority 2 in the draft Programme for Government articulates the need to provide "integrated transport infrastructure and improved public transport", it is not clear how this can be achieved or funded as there are no key commitments expressed under this Priority. Under Priority 3 there is a commitment to "Upgrade the Coleraine to Derry/Londonderry railway line (DRD)" and Council notes the total allocation of £476m for Public Transport in the Investment Strategy. Again there is a lack of clarity about how the cost of this project impacts on the availability of funding for other initiatives.

Council feels that there should be a specific commitment to

1. the introduction of a comprehensive information and communications service covering bus, community transport, taxis, demand responsive services (flexibly routed bus services); community lift giving schemes, community taxi buses, car pools, school transport, social services transport, non-emergency health transport, park and ride facilities and other transport initiatives available in the local area. This should preferably be co-ordinated through one source using the most appropriate IT facilities;
2. the exploration of an integrated ticketing facility, including issues such as concessionary travel, across all public transport providers; and
3. an extension of the remit of community transport schemes to facilitate travel to hospital/medical appointments as well as actively encouraging investment in training and support to both identify and encourage volunteer drivers for such enhanced community transport schemes.

Council also stresses the need to provide adequate rural transport and appropriate maintenance of the rural roads network is essential. Innovative transport solutions must be developed which will boost the rural economy, build communities and improve the delivery of key services. Connectivity between rural areas and economic centres including market towns, larger towns and cities is essential to the long term sustainability of rural areas.

Priority 3. Protecting Our People, the Environment and Creating Safer Communities

Council welcomes the commitment to "Reform and modernise the delivery of Health and Social care (DHSSPS)" but would question whether this would not be better included under Priority 2.

Council would also welcome consideration of the following additional related commitments:

1. Reform and modernise the delivery of Health and Social care including better integration with Social Care to ensure all services are safe and sustainable in urban and rural areas.
2. Develop and implement a new care quality delivery plan to ensure that patients, quality and safety are at the heart of NHS services.
3. Review the regulatory framework for care standards to ensure improved consistency through a regional care contract, simplified portable assessment process, and regional eligibility criteria

Council would also recommend a commitment to the provision of funding to schemes aimed at diverting young people away from crime and anti-social behaviour. These include projects relating to education, training, health, leisure, arts, sports, and restorative justice.

Council welcomes the commitment to "Establish a new service to address the needs of Victims and Survivors of conflict-related harm" but again notes that there is no specific monetary allocation in either the Draft Economic or Investment Strategies.

Council welcomes the commitments in the draft Programme for Government to "Invest over £500m to promote more sustainable modes of travel (DRD)" and "By 2015 create the conditions to facilitate at least 36% of primary school pupils and 22% of secondary school pupils to walk or cycle to school as their main mode of transport (DRD)". However, there is no identifiable link to a specific funding allocation in the Investment Strategy, nor a commitment to deliver the same outcomes in rural areas.

Council wishes to encourage a recognition of the key role which the Waterways can play, particularly in Fermanagh and bordering Counties, in relation to providing sustainable alternative transportation networks. Investment in their improvement would also lead to the potential for further developments alongside the waterways for tourist, hospitality and other service providers.

Council welcomes the installation of electric charge points in Lisnaskea, Enniskillen, Belleek and Irvinestown. The draft Programme for Government

needs to commit to promote the use and availability of electric vehicles at affordable prices in order to support the investment in the charging infrastructure which has already taken place.

Council recognises that, using the car is often the only practicable means of undertaking many journeys in rural areas, which will render this commitment more difficult to achieve within a largely rural community.

Council welcomes the commitments in the draft Programme for Government to "Invest £600m in water and sewerage infrastructure" but notes that the Investment Strategy shows a commitment of £668m in 2011/12 – 2014/15.

Council has significant concerns in relation to recent local housing developments which were granted planning permission subject to the Developer providing private sewage treatment plants until such time as access was available to the public sewer system operated by Northern Ireland Water. In many cases these developments are partially occupied, but the Developer is no longer in business which raises the issue of responsibility for the upkeep and maintenance of the private sewage treatment plants.

Council would also welcome investment in improved ventilation at the points of storm overflows in order to deal with foul odours permeating areas around the storage tanks, with a consequential impact on air quality.

Priority 4. Building a Strong and Shared Community

Council welcomes the commitment to "Reform and modernise the Prison Service (DOJ)" but again notes that there is no specific monetary allocation in either the Draft Economic or Investment Strategies.

Priority 5. Delivering High Quality and Efficient Public Services

In relation to the commitment to "Establish the new 11 Council model for Local Government by 2015" (DOE), the Council stresses the necessity of dealing with, and resolving, the issues of rate convergence and legacy debt early in the process so not to undermine public confidence in the Reform Programme.

A general principle in the Reform Programme was that the transition to the new arrangements should not in itself create an increased rate burden. In 2010 a rate modelling exercise carried out by the Department of Finance and Personnel in conjunction with the Department of the Environment identified that the reform process would have a differential impact on ratepayers in the existing Council areas. By far the most significant differential impact indemnified was in the Fermanagh/Omagh cluster. Whilst it is not possible to predict the rates for the new Council with any degree of accuracy at this stage,

the modelling exercise did indicate that there was a significant risk that ratepayers in the Fermanagh District Council area could face a substantial increase in their rates, whilst ratepayers in the Omagh District Council area potentially could benefit from a reduction in rates.

Fermanagh District Council is concerned that legacy debt could negatively impact on the new Council's ability to invest in the future. Ratepayers in Fermanagh will be required to subsidise a larger level of debt per head of population post Reform, and this could impact on the ability of the new Council to invest in capital infrastructure in Fermanagh.

It is imperative that a solution is found to the rates convergence and legacy debt issues. It is the view of Fermanagh District Council that any proposal to phase-in the impact is not acceptable. A solution must be found to ensure that the transition to the new arrangements will not in itself create an increased rate burden in accordance with the general principle outlined for the Reform Programme.

In the event that the Reform Programme proceeds unaltered it is important that the significant difference in public sector employment levels in Omagh compared to Fermanagh is recognised. Fermanagh's designation as a Sub-Regional Centre in the Regional Development Strategy requires Government support to enhance the role of Enniskillen as a Public Sector Hub for the County. The current practice of transferring jobs from Enniskillen to Omagh must cease and every effort must be made to balance public sector employment across Omagh and Fermanagh Council areas. This will be an important consideration for decisions on the relocation of public sector jobs and in identifying the centre of administration for the new Local Government Body.

Fermanagh District Council is concerned that the vision for the Local Government Reform Programme will not be achieved. The Minister of the Environment in March 2008, Arlene Foster, stated that "Our vision is of a strong, dynamic local government that creates vibrant, healthy, prosperous, safe and sustainable communities that have the needs of all citizens at their core". She also indicated that "Central to that vision is the provision of high-quality, efficient services that respond to people's needs and continuously improve over time". The Reform Programme must deliver strong Local Government with a new range of enhanced functions delivered and appropriately resourced at a local level. The commitment in the draft Programme for Government must deliver reform rather than rationalisation, and can only be justified if there are tangible outputs delivered in accordance with the vision originally set out. Appropriate resources will be required to deliver the Reform Programme and it is the view of Fermanagh District Council that Central Government must commit funding to the Programme. The Improvement, Collaboration and Efficiency (ICE) programme in Local Government will deliver efficiencies over the short to medium and long term and it is the view of Fermanagh District Council that in itself ICE is not a sufficient source of funding for the Reform Programme. The ICE programme

should not be a focus only on efficiency but must also deliver improvement which will require resources and potentially substantial investment to deliver such improvements in the medium to long term. The "Invest to Save" model envisaged in the ICE programme will require a substantial financial commitment from within Local Government inhibiting the sector's ability to resource the Reform Programme.

Council would also welcome consideration of the following additional commitment:

1. Ensure an appropriate settlement for local government in Northern Ireland to enable them to protect vital services in the face of severe funding pressures.

Monitoring and Implementation.

The success of the draft Programme for Government can only be measured by the extent to which it is implemented. This will require sufficient resources to be allocated to programmes of work, with clarity about the funding available to each commitment and to the particular elements within it, together with a robust monitoring and evaluation system that tracks progress and measures the real improvements that are being made. Council recommends that government policy should move beyond economies of scale arguments to identifying measures to consider the social and regional return on investment in terms of rural sensitive indicators.

Strategic buy-in from other government departments is also required. Although funding is available in some cases, it is widely dispersed amongst agencies departments. This hinders complementary working which, although improving, has some way to go.

Conclusion.

Subject to the issues raised above, Fermanagh District Council welcomes the Draft Programme for Government. The peripherality of Fermanagh needs to be recognised in the Strategy and a specific commitment included, with associated milestones/outputs, of realising balanced regional development. It is the view of Fermanagh District Council that balanced regional development is imperative and not merely an option that should be considered. On Page 11 the Programme states that "We are also committed to addressing regional imbalance as we move ahead". On Page 23 there is a commitment to the principles of balanced sub-regional growth, equality and sustainability "when rebuilding and balancing our economy". Fermanagh District Council would contend that achieving balanced regional development should be an overarching priority that is highlighted in the Programme as essential to achieving equality and sustainability.

Equally important to Fermanagh District Council is the necessity of dealing with, and resolving, the issues of rate convergence and legacy debt early in the process so not to undermine public confidence in the Reform Programme.

Financial Capability Partnership NI



Financial Capability Partnership NI

led by the Consumer Council

22 February 2012
Programme for Government Team
Office of First Minister and deputy First Minister
Stormont
BELFAST
BT4 3TT
Dear Programme for Government Team
Programme for Government

The Financial Capability Partnership NI (the Partnership) welcomes this opportunity to contribute to the above consultation. The Partnership brings together representatives from Government, education, banks, building societies, credit unions and voluntary and community sectors to ensure that we all help and support consumers in Northern Ireland to manage their money and make it work best for them. Please refer to annex A for a full list of members.

It is no surprise that the economy remains the primary focus within the Programme for Government (PfG) given the current uncertainty and difficulties. The current economic challenges facing consumers are well known, as is consumers' uncertainty and declining confidence.

The economic downturn has already hit many of Northern Ireland consumers hard. Evidence that the recession is taking its toll on the Northern Ireland consumer is clear when 47 percent of Northern Ireland's adult population are worried about making ends meet now and 55 per cent state they are worried about making ends meet in the future.

Many consumers are experiencing financial difficulties and face significant challenges that will require long term solutions. But it must be recognised that consumers are central to revitalising our economy and our region. Consumer confidence has a huge effect on the economy, with consumer spending accounting for over 60 per cent of UK GDP¹.

Empowered and informed consumers are therefore central to the economic recovery of Northern Ireland. It is essential the PfG faces both ways – toward supporting business and the labour market but also to consumers who drive the economy and demand. Co-ordinated action is essential to support effective change to empower consumers, improve confidence and make a real difference to the cost of living.

¹ 'Through Consumers Eyes', Consumer Focus Report, December 2011

So what is needed?

The Financial Capability Partnership has been working to build political support for a Financial Capability Strategy which would provide a clear focus on improving consumers' levels of financial capability and provide pivotal support for the work ongoing across Northern Ireland.

With the current economic climate, and the impact of the Welfare Reform agenda on household incomes, it is essential that financial capability skills are developed to improve consumer resilience and decision making. Supporting consumers to become more financially capable is an essential objective the Executive should advance which would provide long-term sustainable improvements for Northern Ireland.

Being financially capable means having the skills and confidence to manage your money and use it wisely. It means being prepared for a rainy day; saving in a safe place; maximising income by getting full entitlement to financial help, knowing how to prioritise household costs; having the appropriate insurance cover; being prepared for your retirement; and knowing how to get independent financial or debt advice when it is needed. Enabling consumers to get the most from their money by being able to manage it and make sound financial decisions is a vital part of improving the economy. Having the skills to manage your money, plan ahead and make sound financial decisions will make a difference to individuals, the community and the economy.

Northern Ireland is the only region of the UK not to have developed a Financial Capability Strategy despite consumers in Northern Ireland having the **lowest** levels of financial capability than consumers elsewhere in the UK².

Developing a strategic framework to improve financial capability would help individual personal finances and quality of life and ensure consumers can manage better in difficult financial times. This can help reduce levels of problem debt in Northern Ireland and on a broader level help mitigate the impact of reduced public spending on consumers. It will contribute to boosting consumer confidence whose spending is essential to supporting and strengthening the economy.

It is essential the Programme for Government contains a commitment to developing and implementing a Financial Capability Strategy or Framework which provides a

clear focus on improving the levels of financial capability of Northern Ireland citizens.

If you require any further information please contact Julie McCurley on 028 9067 4809 in the first instance.

Yours sincerely

CAROL EDWARDS

Chairperson of the Financial Capability Partnership

2 Managing Money: How does Northern Ireland add up? 2007, The Consumer Council, (A research report based on the Financial Services Authority (FSA) UK Baseline Survey).

Annex A

Members of the Financial Capability Partnership NI

Advice NI

advice4debtNI

Age Sector Platform

Bank of Ireland

Barclays

Chartered Institute of Housing (CIH)

Citizens Advice NI

Consumer Credit Counselling Service

Council for the Curriculum Examinations and Assessments (CCEA)

Department of Employment and Learning

Department of Enterprise, Trade and Investment

Educational and Guidance Service for Adults (EGSA)

First Trust Bank

Housing Rights Service

HSBC Bank plc

Institute of Financial Planning

Irish League of Credit Unions

Money Advice Service

Nationwide

Northern Bank

Northern Ireland Committee, Irish Congress of Trade Unions

Northern Ireland Council for Voluntary Action

Northern Ireland Court Service

Northern Ireland Housing Executive (NIHE)

Office of First Minister and deputy First Minister (OFMdFM)

Omagh Independent Advice Services

Progressive Building Society

Queen's University Belfast Students' Union

The Consumer Council

The Community Foundation for Northern Ireland

The Open University

Ulster Bank

Ulster Federation of Credit Unions

University of Ulster Students' Union

Your Money Garden Financial Education Project

Fletcher E

Dear First Minister/deputy First Minister

I am responding to the consultation on the Draft Programme for Government (PFG) 2011-2015.

I am concerned that the Draft PFG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PFG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy – sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PFG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PFG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.
- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.
- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.
- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.
- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to ‘Step Up for Nature’ by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely

E Fletcher

Follas A

This is my response to the consultation on the Draft Programme for Government (PFG) 2011-2015.

I am concerned that the Draft PfG lacks an overall vision and is light on key commitments for the natural environment. I believe that the Assembly needs to show the spirit and vision that is needed to make Northern Ireland a leader in sustainability and an example of what local democracy can achieve.

There is an intense focus in the PfG upon growing the economy but this should not be at the expense of the natural environment. Indeed, a healthy environment directly contributes towards a healthy economy - sustainable tourism and creation of the jobs needed to deliver a low carbon economy, are just two examples.

Whilst there are some good things in the Draft PfG, such as a revised Biodiversity Strategy and an Invasive Species Strategy, the document fails to put in place measures to help deliver them. In addition, there a number of significant gaps in the document that must be filled. I ask that the following targets are included in the PfG:

- A Northern Ireland Climate Change Act, with tangible emissions reduction targets for each sector. Currently we are 99% reliant on increasingly expensive imported energy. If we move to a low-carbon economy with a thriving renewable energy sector our energy supply will be secure, and we will have created thousands of new jobs and attracted major investment. Committing to a Climate Change Act would help us deliver this low-carbon economy.

- The creation of an independent environmental protection agency. This would act as a champion for sustainability and environmental protection, and prevent costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law.

- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species.

- A reformed planning system with sustainability at its heart. I want to see a planning system that can help deliver a thriving economy whilst protecting our natural, built and cultural heritage. All development must be truly sustainable and promote long-term societal benefits, and deliver improved health and wellbeing.

- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of halting biodiversity decline and they also provide a range of other benefits including helping support rural communities by providing financial support to farmers and creating significant socio-economic benefits.

Finally, I want the Assembly to 'Step Up for Nature' by halting biodiversity loss by 2016 through a strengthened Northern Ireland Biodiversity Strategy and adequate resources to secure the delivery of biodiversity targets. Many of the recommendations above will help achieve this important target.

Yours sincerely A Follas

Foras na Gaeilge



21 February 2012

Foras na Gaeilge's Submission to the Consultation on the Draft Programme for Government 2011-2015

Foras na Gaeilge welcomes the opportunity to express opinions on the Draft Programme for Government 2011-2015.

Foras na Gaeilge's feedback focuses on our main areas of activity, namely the Irish language and Irish-medium education.

The Irish language

The issue of the Irish language features prominently in the Belfast Agreement and in the St. Andrew's Agreement. That said, it remains as the main area emanating from these agreements that Government in the north has failed to address. There is an opportunity in the current PfG to address issues associated with the Irish language in a positive, coherent way that recognises the Irish language as an important and cherished part of our common heritage, that requires the same protection and development as our built and archaeological heritage. If the commitment to an Irish language strategy is to be realised, it is important that it is given appropriate prominence in the PfG, and that it features in the section of the PfG that deals with Key Commitments. Foras na Gaeilge believes that the Draft Programme for Government would be greatly enhanced if such a step were taken in respect of the Irish language and that it would help to depoliticise the language.

Irish Language Strategy

While an Irish language Strategy features in the Building Blocks listed for Priority 4, we are concerned that it was not included as a Key Commitment, and therefore has no Milestone or

Output attached. Foras na Gaeilge believes that the Draft Programme for Government would be really enhanced if it reinforced the commitment of the DCAL Minister to bring forward an Irish language Strategy, by laying out milestones/outputs that would illustrate the support of the Government for this initiative.

Community relations and social cohesion

Foras na Gaeilge believes that an Irish language strategy will have significant implications for building relationships between our communities, and that it has the potential to contribute positively to advancing social cohesion, as well as advancing use of the Irish language as part of the shared heritage of all who live here.

References are made in the Draft Programme for Government to the importance attached to equity and equality and to the dedication of the Executive to remove inequality from our society. For young people who will be seeking to make the most of employment and enterprise opportunities throughout the island, knowledge of the Irish language, an ability to use it and an understanding of its cultural, hereditary and economic importance will be vital. As we try to provide equality of opportunity as regards employment throughout Ireland for the young people of Northern Ireland, an Irish language Strategy that will specifically recognise that context will be vital. To that end, Foras na Gaeilge believes that an Irish language Strategy for society in the north should be specified under **Key Commitments, Milestones / Outputs in the Programme for Government.**

Primary Assets

The Irish language is one of the primary assets we have in Northern Ireland as part of the community's shared heritage, but that is not mentioned in the Draft Programme for Government. We can benefit from our joint cultural and linguistic heritage to boost the tourism, the creative and the enterprise industries. Unfortunately, Irish is not recognised in the Draft Programme for Government as a primary asset, nor are the opportunities associated with it.

The importance of the Irish language as a national asset will be recognised in the Republic of Ireland; this will benefit the country in terms of culture, tourism, creativity and entrepreneurship. The community in Northern Ireland will be at a great disadvantage unless the same thing happens in the north.

Foras na Gaeilge believes that the Draft Programme for Government would be greatly enhanced if it recognised the possibilities of Irish benefitting the community in those different ways, and **Foras na Gaeilge recommends that our cultural and linguistic heritage be recognised as a primary asset.**

Mutual benefit of the community in the future

The Draft Programme for Government recognises how important the social principles of equality and equity are to social inclusion and good community relations. Foras na Gaeilge believes that recognition of Irish as a cherished part of our joint cultural and linguistic heritage is vital if the principles mentioned in the Draft Programme for Government are to be realised. Accordingly, Foras na Gaeilge believes that **this document would be greatly enhanced if there were a specific reference to the Irish language as we work towards the goal of “of a shared and better future for all.”**

Positive change in society

Emphasis is placed under Priority 4, in the Draft Programme for Government, to taking opportunities related to the cultural, artistic and leisure sectors to achieve positive change. Foras na Gaeilge recognises that the Irish language can greatly help with this process, especially if it is promoted in a way that illustrates that the Irish language belongs to the whole community in the north, just as the minority languages of Wales and Scotland belong to the entire community in those countries; just as is the case with our archaeological and built heritage.

Recognising that, Foras na Gaeilge believes that the Draft Programme for Government would be greatly enhanced if there were a specific plan for an Irish language Strategy as well as milestones/outputs.

Irish-medium education

Foras na Gaeilge is concerned that there is no mention in the Draft Programme for Government to the promotion of Irish-medium education as a key commitment under Priority 4.

Government commitment to the promotion of Irish-medium education is a statutory obligation arising out of the Belfast Agreement. Foras na Gaeilge believes that this commitment should be implemented in the Programme for Government by clearly defining continuous goals that build on the Department of Education's Review of Irish-medium education.

Foras na Gaeilge is surprised by the specific reference under Priority 4 of the Draft Programme for Government to shared education and to the Lisanelly Campus in Omagh as projects that would greatly enhance opportunities for the two communities to be educated together. The context for the promotion of Irish-medium education is in the Good Friday Agreement:

place a statutory duty on the Department of Education to encourage and facilitate Irish medium education in line with current provision for integrated education;

Recognising the duty that is specified in the Good Friday Agreement, that has been given effect by the Northern Ireland Order (Education) 1998, Foras na Gaeilge believes that the Draft Programme for Government would be greatly enhanced if there were a specific reference to the development of Irish-medium education.

Forum for Alternative Belfast

Forum for Alternative Belfast.

Comments on the draft Programme for Government 2012

Order and Presentation

1. The 5 priorities and vision on page 27 are good but should not be locked away in the middle of the document. They should be moved to the start of section 1 so that the four pages of detailed commitments have a context.

2. The detailed commitments on pages 6,7,8 and 9 should be grouped and colour coded with the priorities in section 4.

3. Each priority in section 4 (there are only 5) should have a separate colour.

We recommend the following commitments.

1. Belfast is the economic driver of the region. For the region to work Belfast must work and be its driver. The programme should include an aim to repopulate the centre of Belfast by 50,000 people over a 25 year period. This is possible as demonstrated by the Forums " Missing City Map".

2. The disconnection by Roads of the active Belfast city centre forming the " grey doughnut" of inactive and barren space from the surrounding neighbourhoods be addressed. Only when inner city communities are reconnected to a shared city centre can we consider removing physical interface barriers.

3. Place making and community led spatial planning be at the heart of 1 and 2.

4. Community based visionary spatial plans be developed as part of the review of public administration.

5. "Leap Frog": Learn from other cities and do not repeat their mistakes.

6. Develop a strategy for housing including new models of delivery such as private sector designed to let and not only to sell.

7. Develop a specific strategy for elderly housing.

8. The programme should be streamlined the review of public administration. Planning powers will have moved from the DOE to councils by 2015 within the period of the programme.

Draft Investment Strategy

1. It is unfortunate that the draft Investment Strategy has seven pillars and the programme for Government five Pillars. It would have been good if it was easier to cross reference.

2. Networks Cars dominate again. Road building seems our main passion.



Key Achievements: first three points are roads

Looking Forward: first four points are roads.

3. Social

The reference to primarily retail led regeneration may need supplemented

I attended the Belfast consultation/presentation on the 30th January between 7.30 and 9.30pm in Malone House on the outskirts of Belfast. Access to the building by public transport involves a long walk up an unlit lane through a park, impossible for elderly, disabled or wheelchair users. Is consultation only for people with cars?

Declan Hill

Director

Northern Ireland Programme for Government consultation – FTA response

The Freight Transport Association is one of the UK's largest trade associations, and uniquely provides a voice for the whole of the logistics sector in Great Britain and across the island of

Ireland. Its role, on behalf of over 14,000 members, is to enhance the safety, efficiency and sustainability of freight movement across the supply chain, regardless of transport mode. FTA members operate over 200,000 goods vehicles - almost half the UK fleet - and some 1,000,000 liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight. Our members operate in all areas of the country every day, and take their safety obligations very seriously; particularly where cycling safety is concerned.

FTA also has a sister operation based in Dublin, named FTA Ireland, which represents the needs of many of Ireland's best-known and long established logistics operators. Both FTA and FTA Ireland work together on all-island issues through the All-Island Freight Forum (AIFF).

There are a number of issues contained within the Programme for Government that are likely to affect the logistics industry across Northern Ireland.

WORKING WITH OTHER GOVERNMENTS

The first of these is the plan to integrate and harmonise more closely operations with government both in London and Dublin. FTA fully supports such measures, and has been arguing for a long-time that Northern Ireland could be prejudiced by having different enforcement, regulatory and other systems from its two immediate neighbours and biggest export markets.

There are many good reasons why transport strategies should be harmonised between GB and NI. Perhaps paramount among these is the current perception among GB enforcement authorities that Northern Ireland logistics vehicles; which currently lie at the bottom of the European league table for mechanical, drivers' hours and overload prohibitions performance with vehicles from Ireland and Romania, are a clear safety threat on British roads, and therefore appropriate for targeted enforcement. A closer transport regime between the two would enhance the reputation of Northern Ireland logistics and improve the reputation of the province internationally. There are significant differences in vehicle testing standards, licensing arrangements for both goods and passenger vehicle operators; and this currently benefits nobody.

Where relations across the island of Ireland are concerned, clearly there are a great many areas in which harmony of regulation would be of benefit. So much traffic flows between the north and south of Ireland, that it makes perfect sense for a common approach to make everyone's lives easier. Currently, there are different enforcement regimes, a different approach to European-mandated driver training (the Driver Certificate of Professional Competence), different speed limits and different priorities for Government investment. Synergy is often reliant on the North-South ministerial council, which is a rather high-level tool. FTA believes that a culture of cross-island partnership makes sense from a business perspective, which is why we have taken such a strong leadership role in the All-Island Freight Forum. Regular co-operation with the AIFF is vital for Northern Ireland ministers to

understand best the complexity of cross-border working to the best advantage of the Northern Ireland economy.

ELIMINATION OF AIR PASSENGER DUTY

It is a commonly misunderstood reality of air freight that the majority of freight (around two thirds) moved in the air goes in the hold of passenger planes. Therefore, for Northern Ireland to maintain its goods connectivity it is essential that it maintain its passenger connectivity. The Northern Ireland Executive is to be commended for securing the cut in APD that

will keep important routes out of Belfast viable in the face of previously cheaper options from Dublin. FTA would therefore support the goal of eliminating APD on these routes as it will maintain direct access to important import and export markets.

REGIONAL TRANSPORT STRATEGIES / CONGESTION RELIEF

FTA has always been supportive of Regional Transport Strategies, which reflect the different regional needs across the province; and if achieved the intended 2.5% cut in congestion would make a clear material difference to commercial transport.

Regional Transport Strategies are a sensible way of responding to the needs of local transport without being bound to the small boundaries of any individual local authority area. It is, however, key to the success of these that they do not focus solely on passenger transport. It is important that effective delivery strategies, formed in partnership with industry, play a central role in development of the wider regional strategies and ensure safer, more efficient transport.

However, the concern about the congestion proposal at the moment is how the congestion target will be achieved, and whether it will be done in a way that most benefits business, the key driver of the economy. For business, there are certain key routes and corridors that need tidying up, such as the Titanic Quarter and the Harbour Estate in Belfast which are both dependant on the Dee Street roundabout, a junction that is currently unsuitable, which currently ensure gridlock at certain times of day for goods leaving Northern Ireland or, worse still, conveying a terrible impression to overseas companies by vehicles grounded to a halt upon arrival.

INTEGRATION OF TRANSPORT POLICY

This is central to the development of transport policy in Northern Ireland, and FTA looks forward to working with the Executive to make this a reality. No form of transport – whether pedestrian, cyclist, motorist, train or haulier – exists in a silo and each interacts with the others. Integration of planning and policy is therefore key to progress.

This integration also impacts other developments across Northern Ireland. For example, the Programme for Government discusses hospital building. It is vital that hospital building is planned and located in such a way that employees have a variety of options of getting to work and are not just reliant on their own car; ambulances can access the hospital and population centres quickly and easily, and that deliveries can be carried out as efficiently as possible. If blood and medical supplies are not able to get to a hospital, then the consequences could be grave indeed.

ROAD SAFETY

Northern Ireland is shortly to have a full Operator Licensing scheme, which will bring “own account” and “hire or reward” goods vehicle operators under the same licensing format for the first time. This will have numerous benefits for everyone across Northern Ireland – it will help to improve the international reputation of Northern Ireland logistics, by demonstrating its commitment to improving standards; it will promote fairness in regulation across the industry; reduce criminality and above all it will promote safety on the roads.

If the Passenger Carrying Vehicle sector were also to be subjected to a similar standard of licensing, for which Goods Vehicles will have already provided a working prototype, then roadworthiness standards will begin to improve across the board. We can then see the kind of reductions in serious and trivial collisions indicative of the safer roads we all want to enjoy.

French C

I am writing with my response to your programme for government I feel that the proposals for the new local government reform I feel that this particular reform should have been put to the people to decide were their local council goes to many Strabane citizens are not happy to amalgamate with Derry.

The reasons are unknown at this stage but Derry city council have a huge deficit and people feel that they won't be picking up the tab for them a lot of people feel that Strabane and Omagh should amalgamate and keep the two West Tyrone Councils together in the same Constituency people both in Omagh and Strabane would like to be together I would like to put forward a proposal to the executive to put the question to the people and see how they feel.

C French

Local Youth Representative, Strabane

Freshwater Taskforce

Reference: Freshwater Taskforce response to the draft Programme for Government 2011-15

22 February 2012

Dear Sir/Madam,

The Freshwater Taskforce (FWTF) comprises representatives from a range of organisations operating in Northern Ireland who are working together to ensure that Northern Ireland preserves and improves freshwater ecosystems by encouraging Government to adopt a sustainable and integrated approach to water management.

Sustainable water management has many benefits including improved water quality, flood abatement, climate change mitigation, landscape and wildlife protection and provides valuable recreational and aesthetic benefits to residents and visitors. The FWTF believes that effective implementation of this will require a commitment by the Executive in their current mandate.

The Freshwater Taskforce appreciates the opportunity to consult on the proposed Programme for Government 2011-15 in Northern Ireland.

Water is the world's most precious resource that supports life, health and well-being, our economy, wildlife, leisure activities yet we fail to manage water in a way that reflects its true value.

The **EU Water Framework Directive (WFD)** creates the opportunity to significantly influence and change the approach to river basin management in Northern Ireland to positively impact water quality, water efficiency and water dependent habitats. Potential economic benefits from improved water quality arise in the form of reduced costs of water treatment, increased revenue from tourism and a more cost efficient supply chain for food production.

□ Ballinderry River Enhancement Association, Friends of the Earth, Northern Ireland Environment Link, RSPB, The National Trust, Ulster Angling Federation, Ulster Wildlife Trust, Wildfowl and Wetlands Trust, WWF Northern Ireland
Currently **less than 30%** of our water bodies are of 'Good Ecological Status', required under the Directive by 2015. The Freshwater Taskforce are concerned that a failure to adequately plan to meet Directive requirements will **risk infraction proceedings from the European Commission**.

The Freshwater Taskforce (FWTF) are disappointed that the draft Programme for Government does not explicitly include an action relating to the protection of our freshwater environment. We believe that a dedicated target to comply with the Water Framework Directive should be added, demonstrating a commitment to the following:

1. Adequate resources to support the full implementation of the Water Framework Directive (WFD)

The DOE budget revealed that the Executive proposes to fund River Restoration activities for £1.1m annually, less than half of the £8.8m initially requested by NIEA to fund WFD implementation. The Atkins Global Regulatory Impact Assessment (October 2009) found that

while it would cost society £12.2m to implement the WFD in full in Northern Ireland, benefits would total £23-25m. Further, delivery of WFD in Northern Ireland is heavily reliant on existing measures such as agri-environment schemes, which have recently had their budgets cut dramatically, with no estimation of the impact on the delivery of good water quality.

Government must seek to implement the WFD by ensuring it is fully funded.

2. Increased levels of Monitoring and Enforcement

Improvements are required in levels of monitoring and enforcement related to pollution of water bodies and in particular the problems caused by agriculture, industry, road construction,

defective septic tanks and under-performing Waster water Treatments Works. The DOE Budget proposed a reduction in preventing and responding to pollution incidents. The final RBMPs rely heavily on existing legislation and policies, such as the Nitrates Directive, to achieve improvements in water quality. Without adequate monitoring and enforcement, this approach is futile.

The FWTF urge Government to commit to adequate levels of monitoring and enforcement supplemented by supported local community initiatives to ensure compliance with policies.

3. Consistent assessment of comprehensive information about the full impact of water abstraction

The FWTF is concerned that the current implementation of the Abstraction and Impoundment Licensing Regulations provides insufficient protection of the freshwater environment. Incomplete information about the level and cumulative impact of water abstraction on our rivers in Northern Ireland is resulting in excessive water abstraction leaving stretches dewatered, with high risks of interrupting salmonid migration. While efforts to harness renewable energy production from 'fish-friendly' hydropower are welcome, consideration must be given to the current and future impact on the flow regimes within rivers. The protection of SAC designated rivers is a particular concern.

FWTF stresses the need for abstraction which is sustainable and takes account of the full impact on river habitats to afford reasonable protection of the environment.

4. Plans to protect water dependent protected areas

Protected areas support our most environmentally sensitive and significant habitats. Under the

Water Framework Directive, these sites must reach favourable status by 2015. The River Basin Management Plans report that only 21% of water dependent protected areas are in favourable status and 11% have not been assessed. Plans containing measures to achieve targets are incomplete.

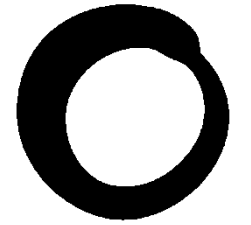
Government must ensure plans and associated implementation funds are in place to deliver conservation targets in water dependent Protected Areas.

5. Promotion of sustainable flood management and SuDS approaches within all departmental policies

Recent flooding events, climate change predictions and pressures on the public purse have emphasised a need to manage flood risk in a more sustainable way. This means being smarter about when to invest in structural flood defence and **prioritising natural flood management techniques** which are: less harmful to the environment; more cost effective over time as they require less maintenance and provide a range of additional environmental benefits that will support achieving WFD targets.

A duty to promote a sustainable flood management approach should be explicitly stated within all departmental policies.

Furthermore **a strategy for promoting the use of Sustainable Drainage Systems (SuDS)** needs to be implemented within Northern Ireland as a matter of urgency. SuDS will help to achieve the requirements of a range of policies, including the Water Framework Directive and Floods Directive.



**Friends of
the Earth**
Northern Ireland

Consultation response

Programme for Government 2011 – 2015

Friends of the Earth

Introduction

Northern Ireland, in common with the rest of the global economy, is facing a triple crunch of recession; accelerating climate change; and growing energy insecurity. These three overlapping events pose obvious threats. But they also offer significant opportunities for a major economic transformation to a low-carbon economy that creates thousands of jobs; reduces reliance on fossil fuels; and enables us to contribute our fair share of emissions cuts.

Such a transformation can only happen if we adopt a different model of development – one that encompasses economic, social and environmental considerations. Strong economies of the future will be the ones that achieve a synergy between these three considerations,

economies based on the principles of Sustainable Development.

- The Northern Ireland Executive should embed Sustainable Development at the heart of the Programme for Government.

Climate change and energy security

We know that climate change is already destroying the lives and livelihoods of many of the poorest and most vulnerable people in the world. As global temperatures rise further this trend is set to continue. The effects, mostly negative, on human health, the economy, natural habitats and water resources have all been well documented.

If Northern Ireland fails to create the key policy drivers that are designed to reduce emissions there may be a short term economic advantage but this would come at a high future cost as competitors would have learnt to thrive in an environment dominated by high fossil fuel and carbon costs. The Stern report was explicit in its view that the economically smart thing to do is to spend a proportion of GDP on reducing emissions now in order to avoid future costs. This can only happen if the Assembly takes the lead.

Climate Change Act

The Environment Minister should introduce a Climate Change Act that will create the framework within which Northern Ireland can reduce its greenhouse gas emissions. In line with the UK and Scottish Climate Change Acts the Northern Ireland Act should set targets for at least an 80 per cent reduction in emissions by 2050 on 1990 levels; with an interim target of at least 40 per cent by 2020 to ensure a managed reduction in greenhouse gas emissions up to 2050. It is important to note that any targets set by legislation should be informed by the most up-to-date science.

In addition the Act should include provision for the formulation of carbon budgets to give short to medium term focus to each Assembly term.

Legally binding carbon reduction strategies and targets at devolved level would:

- Translate the Executive commitment to make a fair share reduction in greenhouse gases into clear policy;
- Give an unambiguous steer to business of the Executive's intention to move Northern Ireland to a low-carbon economy;
- Curtail debates as to *whether* to cut emissions and enable the focus to be on *how* they should be cut, thus making the task more politically straightforward; and
- Ensure that Northern Ireland benefits from the social, economic and environmental gains to be derived from cutting greenhouse gas emissions.

Green New Deal

The Green New Deal has received a positive response from Northern Ireland's politicians.

Unfortunately, that positivity has not been translated into real action, policy commitments or financial support.

The Green New Deal group has combined its substantial expertise to bring forward concrete proposals to tackle the triple crunch of recession, energy security and climate change by investing in energy efficiency and renewable energy.

- The Green New Deal will leverage resources and expertise to sustain and create thousands of jobs in the construction and renewable energy sectors;
- It is an opportunity for Northern Ireland to free itself from its 99 per cent dependency on imported fossil fuel and to cut its carbon emissions; and
- The proposals will help the many in fuel poverty and reduce energy bills for many more.
- In addition to the measures proposed by the Green New Deal group Friends of the Earth recommends the Code for Sustainable Homes be mandatory for all new homes, not just social housing, and that the Code be extended to all new buildings, renovations and include points for sustainable transport links.

Secure low-carbon energy

Any energy policy relying significantly on importing fuels from unstable regions of the world is inherently problematic. In addition, climate change adds an extra layer of difficulty to a policy based on fossil fuels. Fluctuating demand is likely to lead to unstable and unpredictable prices making budgeting difficult for Government, business and home-owners alike.

In this context, indigenous fuels such as shale gas, lignite, or Rathlin oil can look attractive. The exploitation of such resources is not compatible with the need to move to a low-carbon economy, and have a raft of social, economic, and environmental problems associated with them.

As the price of oil rises, low cost energy options are likely to be low-carbon options, which mean energy efficiency and renewables. The grid should be expanded into areas with the best renewable resource, and it should be strengthened to facilitate greater use of these technologies.

Micro-renewables, such as solar thermal, heat pumps and biomass burners, should constitute a significant element of a low-carbon network. The high upfront costs of installing micro-renewables mean uptake is likely to be small. Cost mitigation measures, such the Green New Deal Pay-As-You-Save, Feed-In Tariffs and Renewable Heat Incentives would help to offset the upfront costs.

- There should be a policy presumption against the exploitation of indigenous fossil fuels;
- Introduce Feed-In Tariffs, initially at a similar rate to the GB scheme but with a view to raising the tariff to further incentivise the up-take of renewables;
- Grid infrastructure development to facilitate renewable energy; and
- Fulfil the commitment to make the civil service estate carbon neutral by 2015, and extend the target to include all public sector properties, including schools, hospitals and prisons.

Transport

Transport is the fastest growing source of climate changing gases, contributing about 27 per cent of Northern Ireland's total. Despite this, the Department for Regional Development still plans to spend 82 per cent of transport monies on roads, and only 18 per cent on sustainable modes such as walking, cycling and public transport. Road building encourages travel by car; undermines public transport; and will lead to increased carbon emissions.

- Increase investment in public transport, cycling and walking to at least 65 per cent of total transport spend;
- Freeze public transport ticket prices;
- Introduce integrated public transport ticketing;
- Invest in the Derry to Coleraine rail-line to create a commuter line with increased service frequency;
- Invest in the Belfast to Dublin Enterprise service to enable 90 minute journey time and an hourly service;
- Halt new road schemes, including the A5 dualing, and increase investment in roads maintenance;
- Work within North/South Ministerial Council to persuade the Irish government to raise fuel duty to UK levels to eliminate international fuel bunkering; and
- Oppose the future expansion of Northern Ireland's airports, including Belfast City Airport, and invest in improved surface transport links with GB

Waste

Waste should be viewed as a valuable resource to be utilised rather than a problem to be disposed of. The Waste Management Strategy has adopted a policy based on unambitious recycling targets and incineration of the rest. Waste reduction and recycling are better options than incineration, even with energy recovery. Incineration actually increases greenhouse gas emissions when compared with recycling because destroying materials through burning means that we then have to use more energy overall to extract and process raw materials into the goods that we buy and use.

- Set a real waste reduction target to stabilise waste production;
- Rule out incineration as a waste management option and concentrate instead on options further up the waste management hierarchy;
- Increase recycling targets to at least 70 per cent by 2025 in line with the Scottish and Welsh targets. The feasibility of attaining a target of 70 per cent recycling by 2020 should be assessed;
- Ban the landfilling of all re-useable, recyclable and compostable materials;
- Support local authorities to increase their recycling rates through kerbside collection of source separated waste;
- Invest in a network of small-scale anaerobic digestors which can feed Combined Heat and Power plants; and
- Increase the capture rate of methane from landfill sites to be used in Combined Heat and Power plants.

Planning

Measures to combat climate change start with the planning system. Land-use planning dictates where we live, work, socialise and shop. If a package of measures including liveable cities, walkable communities, higher housing densities, use of new technology and improved public transport was really pushed, then significant gains could be made in reducing carbon emissions. Northern Ireland's planning policy should have climate considerations at its core if it is to address all these areas. It would also have positive knock-on health benefits such as increased fitness, and lower levels of obesity, breathing problems, and road traffic accidents as people walk and cycle more and drive less.

- Greater transparency should be embedded in the planning system including:
 - Clear protocols clarifying the roles of Ministers, Assembly Committees, other politicians and civil servants;
 - A requirement to publish the reasons for approval of a planning application;
 - No charge to view planning files should be imposed on the public;
 - Planning Service administrative systems should be reformed to facilitate

- transparency;
 - Strict protocols to ensure consistent and robust policy driven enforcement action; and
 - Remove the anonymity of donors to political parties so that the public can be confident Ministers are making decisions in the public interest.
- Publish a Planning Policy Statement on Climate Change, either as a standalone document or as an amendment to PPS 1, to make climate change a primary material consideration of the planning system;
- Planning Policy Statement 5 on out-of-town shopping should be published as a priority, and in the interim there should be a moratorium on decisions on out-of-town shopping developments;
- Planning Policy Statement 18 – Renewable Energy should be redrafted to include a presumption in favour of the development of renewables, with appropriate exceptions;
- Redraft Planning Policy Statement 21- Sustainable Development in the Countryside, to include a presumption against development in open countryside, and help to move Northern Ireland towards more sustainable forms of rural development;
- Community participation should be encouraged, particularly full and early participation, to increase community confidence, minimise objections and reduce the need for appeals. The planning authority should be required to prepare a clear, concise and comprehensive Statement of Community Involvement;
- Introduce a third party right of appeal; and
- Introduce a Community Infrastructure Levy to ensure communities receive some tangible benefit from developments in their area.

Environmental protection

Northern Ireland's environmental protection regime has failed to prevent the deterioration of many of our most precious wildlife sites. Despite the rebranding of Environment and Heritage Service as the Northern Ireland Environment Agency raw sewage still pollutes waterways; illegal landfill sites litter the countryside; vulnerable wildlife continues to be put under greater threat and historic buildings are trashed.

- Adhere to the commitment given by the Minister of the Environment to carry out a full public review of the performance of the Northern Ireland Environment Agency;
- Establish an adequately resourced Environmental Protection Agency modelled as a Non-Departmental Public Body;
- Remodel the Department of the Environment to include responsibility for environmental policy, strategic planning, transport and energy policy; and
- Bring forward a Marine Bill to ensure the protection of Northern Ireland's coastal waters.

Food and farming

Food production and procurement are significant contributors of global warming gases. The production of fertilisers, for example, is very heavily dependent on fossil fuels. And the transporting of food and fodder long distances is not only inefficient, it also produces large quantities of CO₂ – for example, a typical basket of imported goods produces about as much as an average 4-bedroom house emits in eight months for cooking.

Agriculture remains a major job creator but the number of rural dwellers actively working in agriculture is declining. Organic and low-input agriculture are more labour intensive than current conventional farming practices and offer an opportunity to reinvigorate the rural economy.

- Increase support for organic and low-input farming methods;

- Grant aid the installation of on-farm anaerobic digestors and domestic scale Combined Heat and Power;
- Public sector to specify local food in its procurement contracts;
- Despite more than three decades of expensive research, development and political support, GM farming has not delivered on its promise of miracle crops, higher yields or a better deal for farmers. The Executive should work with the Irish Government to declare the Island of Ireland a GM-free zone; and
- Amend the Allotments Act to require Local Authorities to provide land for allotments if there is sufficient interest from the community.

Conclusion

The current economic crisis and budgetary cuts are quite rightly exercising the minds of the Executive. There is little that can be done about the cut to Northern Ireland's Block Grant but Ministers still have control over how the grant is spent.

The cuts should be viewed as an opportunity to reassess spending priorities and reallocate funds as appropriate. Priority assessments should be viewed through a sustainable development lens.

Invest NI has a role to play in promoting and investing in enterprises that are compatible with the principles of Sustainable Development. Carbon Audits, Climate Impact Assessments and Sustainability Assessments should become standard practice for the Department of Finance and Personnel's Green Book economic assessments.

Rather than relying on ephemeral and unpredictable foreign investment that results in profits leaving Northern Ireland, the Executive should invest in the development of our traditional indigenous industries – agriculture, construction and manufacturing. With sufficient Executive support and policy direction these traditional industries could become exemplars of low-carbon development.



**RESPONSE TO THE NORTHERN IRELAND EXECUTIVE'S DRAFT
PROGRAMME FOR GOVERNMENT,
INVESTMENT STRATEGY,
REGIONAL ECONOMIC STRATEGY**

NORTHERN IRELAND POLICY UNIT

February 2012

Dear Sir/Madam

Re: FSB Response to the draft NI Programme for Government, Investment Strategy and Regional Economic Strategy Consultation

The Federation of Small Businesses is Northern Ireland's largest business organisation with 8,000 members, drawn from across all sectors of industry, and over 210,000 members throughout the UK. The Federation lobbies decision makers to create a better business environment and welcomes this opportunity to respond to the draft Programme for Government and Investment and Economic Strategies.

We trust that you will find our comments helpful and that they will be taken into consideration. The FSB is happy for this submission to be placed in the public domain.

We would appreciate being kept apprised of further developments.

Yours faithfully



Wilfred Mitchell OBE

Northern Ireland Policy Chairman

Introduction

The FSB welcomes the publishing of the draft Programme for Government, Investment Strategy and Regional Economic Strategy. Together, they form an important step forward in the campaign to rebalance and grow the Northern Ireland economy and we look forward to further opportunities for engagement with the Executive and Departments as high-level plans are developed and implemented.

It is critical that growing the economy remains as the Northern Ireland Executive's top priority over the lifetime of this Programme for Government, and reflected in the draft Investment Strategy and Economic Strategy.

However, upon analysis, many of the commitments have already been announced in the past, with some progressing towards delivery, whilst others are more aspirational in nature. Therefore, we will be looking particularly in depth at those commitments which will have an impact on our economic revival.

The commitment to promote over 25,000 new jobs does seem ambitious in the current economic climate, although the FSB would applaud the Executive for showing ambition, and the willingness to be judged on its delivery.

Running alongside small business sector growth, the FSB supports the drive to create the conditions that will encourage Foreign Direct Investment in the province, and in turn stimulate small business activity through a 'trickle down' effect.

Similarly, initiatives such as increasing manufacturing exports, supporting investment in R&D and, in respect of tourism, increasing visitors significantly, will all be challenges. However, the FSB recognises there has been significant progress in many areas to meet these challenges, with campaigns such as 'Boosting Business'.

The FSB has actively campaigned for an extension of the Small Business Rates Relief Scheme and welcomes the progress made on this to date, as well as proposals to devolve the Air Passenger Duty to the Northern Ireland Assembly.

Many of the commitments will have a much-needed stimulating effect on the local construction industry and the FSB would urge the Executive to move quickly to invest in making these commitments a reality.

However to do so, the long-running problems relating to the planning system must be addressed and a sense of dynamism injected into related processes.

Where We Are

There is no doubt that the Executive has faced a very difficult period in terms of falling levels of available funding and the impact of the global economic crisis. Credit should be given for Northern Ireland being recognised as the second most popular destination for UK FDI, but this underscores the need to deliver lower corporation tax if we are to make significant further strides.

The current situation should also be seen as an opportunity for investing in local infrastructure, skills development and making progress in modernising (and where possible encouraging greater private sector involvement in) public service structures and delivery.

To do this there is a need for greater joined-up government (outlined in comments relating to the Regional Economy Strategy). Again, the FSB welcomes the sense that parties are becoming more adept at working in partnership, and the international profile attributed to Northern Ireland remains positive.

The programme of celebrations in 2012 and 2013 are ideal opportunities to build upon this goodwill.

Priorities

The FSB welcomes the priorities set out in the Programme;

- Growing a sustainable economy and investing in the future
- Creating opportunities, tackling disadvantage and improving health and well-

- being
- Protecting our people, the environment and creating safer communities
- Building a strong and shared community
- Delivering high quality and efficient public services

Priority 1: Growing a Sustainable Economy and Investing in the Future

The list of commitments in this area over the next three year period has the potential to generate significant economic activity in Northern Ireland.

The emphasis on *growing the private sector including small and medium indigenous enterprises* is especially welcome. The objectives are in line with those that the FSB has previously advocated in such areas as skills and training, innovation, tourism development and encouraging SME development. However, to achieve these, the conditions must be in place to encourage SMEs to grow. It is hoped that the accompanying Economic Strategy will lay down the conditions for this growth.

We also welcome the Executive's stated commitment that it "will focus on increasing productivity and supporting growth in well-paid, highly-skilled jobs."

This also needs to apply to SMEs and not just focus on large blue-chip companies. We also agree that the workforce needs to be better qualified and more flexible. Companies must become more innovative and invest in more research and development, and a culture of enterprise and business growth has to be encouraged. In this regard we would emphasise that small businesses must have access to practical support, both advisory and financial, as well as clear guidance on compliance with regulation and legislation. **As a corollary, the Executive must utilise effective and open public procurement to ensure that it is not only setting a framework for business but that it is also using its role as a large, quality customer to have the maximum beneficial impact on our indigenous small businesses.**

The draft PfG, comprising a vast array of sub-strategies illustrates where Northern Ireland is at present. There will be those who will continue to thrive on consultations and master plans, seeing them as an end in themselves, but with such a catalogue of strategies in place, surely now is the time for Priority 1 to be implemented.

The example of eliminating **Air Passenger Duty on direct long haul flights** (p.31) is an example of where a threat is identified, leading government and

business to work effectively together to eliminate it as a potential danger to economic development.

It is important to make note of the issue of **energy costs** as a burden on local businesses. These are moving in a direction which is becoming a barrier to economic development, so a coherent strategy to address this area is essential. For renewable sources to maximise their potential, problem areas, particularly in relation to planning, need to be addressed. The intention to '*encourage industry to achieve 20% of electricity consumption from renewable electricity...by 2015*' suggests an Executive which is ambitious, but more work needs to be done to engage with the broad SME sector.

Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Well Being

The FSB welcomes the commitment to tackle the unacceptably high levels of economic inactivity and educational underachievement in many areas of Northern Ireland.

It is essential that future initiatives to address issues within this priority are underpinned by the principle of economic sustainability, for example with efforts to grow the number of social enterprises and encourage a greater sense of entrepreneurialism in numerous areas where unemployment has blighted many lives.

There must be a co-ordinated approach taken in respect of the aims of the proposed Social Investment Fund, hosted by OFMDFM, to ensure neither duplication nor gaps in provision across the relevant cross departmental strategies.

Similarly, there is need for greater encouragement of successful business people to engage in this area – for example, mentoring programmes, 'youth champions' etc.

This is a particularly challenging area, especially in light of the difficult economic conditions that prevail at present, and will probably worsen as spending cuts come into effect over the next couple of years.

Therefore, it is imperative that all relevant agencies and departments work in a co-ordinated fashion to maximise those opportunities that exist and ensure resources are directed into measureable outcomes.

Priority 3: Protecting Our People, the Environment and Creating Safer Communities

&

Priority 4: Building a Strong and Shared Community

The FSB welcomes the commitment to ensure that sufficient measures are in place both to protect communities and their welfare.

The FSB is concerned at the impact of crimes against businesses. There is often a misconception that these are 'victimless crimes' where, in fact, they have a severely detrimental effect on small business owners, their staff and their viability.

The FSB has been continually highlighting the issue of crime as it is now one of the main barriers to running a successful business.

- The impact of crime on businesses has been underestimated for too long. Crime has closed down many businesses, particularly in areas where racketeering and extortion are prevalent.
- In addition, many businesses face problems arising from the negative perception caused by louts and vandals hanging around, thus negatively impacting on trade by intimidating potential customers.
- Crime, and the fear of crime, is a concern for most businesses in Northern Ireland and there is a genuine perception amongst the business community that no one cares. This must be addressed.
- Crime has a devastating impact on businesses, particularly SMEs, as they lack the human and financial resources of larger businesses to implement crime prevention measures.
- Crime is stretching already slim budgets as well as causing disruption and anxiety in the workplace. Businesses tend to report crime mainly for insurance purposes as opposed to getting the issue dealt with.

The FSB led the way in working with the Northern Ireland Policing Board and the

PSNI to develop the Business Crime Strategy *'which is to assist in achieving the Policing Plan objectives, thereby delivering on the Police Service's purpose to make Northern Ireland safer for everyone. Through increased partnership working and long-term commitment, the Business Crime Strategy will build and develop ongoing work to prevent and detect crime affecting the business community. This work must take account of the realities of the broad and constantly changing environment'*.

Current key issues that have an impact on the Business Crime Strategy include:

- The FSB would like to see a more co-operative structure at local level, such as between District Policing Partnerships and businesses. Attendances at DPP meetings at present are negligible and consideration should be given to business-focused events, taking into account timings and locations to make them accessible and convenient for businesses.
- The current intention to merge these DPPs with Community Safety Partnerships is a step in the right direction but must be underpinned by a commitment to meaningful engagement with businesses.
- The PSNI has been commended for its use of social media to connect with residents and communities. The FSB would like to see this being extended to communications with businesses and their staff.
- There needs to be a clear commitment to tackling business crime by the entire criminal justice system. A prison sentence is not suitable for all offences, but the punishment must fit the crime if the judicial system is to retain business confidence.
- Planning regulations should be relaxed so that businesses can install CCTV, metal shutters and other security measures that allow them greater flexibility in protecting their premises.

With regard to strategies to promote and maximise our natural environment and built heritage, too often there is a feeling that these run contrary to economic development, where in fact they should not be mutually exclusive.

Priority 5: Delivering High Quality and Efficient Public Services

Northern Ireland needs efficient and high quality public services that work in partnership with the private sector to underpin the regeneration of the local economy and grow key areas such as tourism.

While considerable progress has been made, it is obvious that there are many areas

where innovative thinking could significantly improve delivery. For example increased involvement in the local health service has meant opportunities for a number of SMEs to demonstrate their capabilities, and there should be no sacred cows - if it makes economic sense, the political will must be found to implement radical thinking.

Conclusion

All the priorities in the Programme for Government are interwoven to present an action plan for Northern Ireland for the next few years. Like the Economic Strategy, it is difficult to challenge any of aspiration that underlies the content – instead the focus must be on delivery.

The PfG is an overarching document – encompassing over sixty individual, separate strategies, and therefore it is essential that measurements for each highlight where weaknesses exist and where affirmative action is needed to rectify. There are significant underlying problems in areas such as skills, infrastructure etc which need to be addressed if the PfG is to achieve its goals.

Budget constraints are evident throughout all the departments and the FSB recognises that priorities must be determined. The accompanying Investment Strategy displays a welcome determination to invest in those areas which will improve Northern Ireland's infrastructure.

It is vitally important that the expectations raised by the draft Programme are met because of the wider consequences for Northern Ireland.

A small business owner recently commented that we are now in a '*prosperity process, not a peace process*' and the energy for the former should be as vigorous as it was for the latter.

Economic Strategy

The FSB is broadly supportive of its contents and recommendations and sees the greatest challenge being its comprehensive delivery during the target period.

This document is recognised for what it is – an overarching strategy and, with this in mind, a greater level of detail will be expected in the component strategies relating to innovation, tourism, etc, which are yet to be published. It should be taken in the context of building on a series of recent initiatives including the Independent Review of Economic Policy, published in September 2009, and the ongoing campaign to secure the devolution of corporation tax powers to the Northern Ireland Assembly.

However, the publishing of an Action Plan is a welcome step forward, in particular those points with definitive dates and named responsibility-takers. Whilst it is accepted that there will be unavoidable changes and situations arising which cause diversions from the plan, the action plan will give a sense of delivery and it is up to all stakeholders to meet their obligations or face in-depth scrutiny.

Where possible, those points with looser interpretations should be strengthened with more measurable outcomes and firmer dates applied, at least as part of a rolling process of continuous, live monitoring of the strategy performance.

There is currently a mixture of prospects facing the Northern Ireland economy. While there are many areas of negativity – employment levels, retail closures, etc – Northern Ireland has either benefitted, or has the potential to benefit, from a series of positive economic drivers, including the 2011 M TV awards, 2012 Titanic commemorations, the Irish Open, 2013 UK City of Culture. Where possible, there must be assurances from Government that all resources will be in place to ensure these can be maximised and be the resounding successes that they ought to be, including those which will provide an economic legacy for the province. Equally, the business community must work positively to ensure these events are delivered successfully from an economic perspective.

Therefore, the FSB would wish to see senior business representatives play a key role in periodically reviewing the strategy and have meaningful input into its updating. Private sector signatories should also be accountable for tasks they agree to undertake to ensure responsibility for delivery is shared between the public and private sectors.

The FSB has repeatedly called for efficient, joined-up government to maximise the effectiveness of public policy delivery. The FSB will not comment on political issues but will say that if the Northern Ireland Executive is to realise its ambition of radical economic transformation, the structures of government must reflect the innovation and energy of the private sector.

The Executive Sub-Committee on the Economy is a start but there is much further to go.

The political will does exist to make change a reality. However, the economy must remain the number one priority for the Northern Ireland Executive for the foreseeable future, not only in word but in deed.

It is particularly welcome that this document is of a cross departmental nature and reflects the need for departments, irrespective of which party or minister controls which portfolio, to work together to deliver a cohesive plan which will improve the business opportunities and job prospects for the local community.

However, the recent announcement of proposals to abolish the Department of Employment and Learning, demonstrates how the Executive can reach an almost instantaneous decision. This contrasts sharply with the drawn out processes which have frustrated the business community on many occasions. Irrespective of the final outcome of this particular matter, it is hoped that this is an indicator of a greater sense of urgency which will be reflected across a range of different matters in the future.

Overarching Economic Goals

The need to increase the level of exports and external sales as a proportion of NI output is extremely important and this should be the core principle in the strategy.

This increase will ultimately benefit through greater employment levels although if the strategy is to be successful in increasing the proportion of the working age population in employment cross-departmental, long term solutions must be developed. It is understandable that, due to the economic crisis, it has been necessary to implement short term solutions to stem the loss of jobs; indeed this is a welcome sign of flexibility, but quick fixes should not become the norm. There are many underlying factors and it is by addressing these that real benefits will be achieved.

The most challenging target is to see Northern Ireland private sector output growth exceed the UK average. It will require significant investment and subsequent uptake in Research & Development activity and growth of sectors such as the creative industries, renewables etc. This will require a dramatic change in attitudes towards financing, especially from banking institutions, and although national initiatives appear to have had little effect to date, new initiatives such as those announced by Invest NI and a growth in Venture Capital funds etc could begin to feed into the system.

It is also important to look closely at those areas of Northern Ireland which have continually shown underperformance in key economic indicators – in particular new business starts, employment inactivity etc. The current OFMDFM consultation on the Social Investment Fund (SIF) makes reference to a strategic objective being *'building pathways to employment.....promoting business startup and increasing sustainability through social enterprise'*.

It is important that this is aligned to the Economic Strategy. There is significant potential to be unlocked, with many areas being targeted by SIF, so it is important that a strategic approach is taken to unite the relevant areas of SIF, Economic Strategy etc.

Corporation Tax

The FSB is supportive of the campaign to devolve Corporation Tax setting powers to the Northern Ireland Executive.

The Economic Strategy is somewhat overshadowed by a lack of certainty on this issue, although it is recognised that the strategy proposes a package of measures which have the potential to grow the local economy significantly, even if a negative response were received in respect of this campaign. However, Northern Ireland is in a place whereby it requires a major change in trajectory. Therefore, despite overuse of the term, devolution of corporation tax powers and substantial reduction of the rate would truly be a *'game changer'*, especially when used alongside other proposals in the Economic Strategy.

It is not intended to revisit the long and detailed arguments within the context of this consultation response except to say that, given the barriers it faces from other devolved regions, the EU etc, it is vital that business and government present a united argument and a substantive economic strategy is agreed and presented.

End Year Flexibility

A great issue of concern is the lack of flexibility in the end year budget process. It is necessary to look past the sensationalist and often inaccurate headlines in the local media and recognise the underlying issues which have caused the necessary return of unspent funds.

Undoubtedly there have been issues whereby businesses have been unable or unwilling to match fund proposed projects, however, where possible, if this is the case greater flexibility should be permitted to allow DETI/INI to roll over funds if required. This approach would be reflective of a flexible, dynamic, entrepreneurial culture in the private sector, and it should be encouraged and adopted within DETI and INI.

It has been said that this is not an achievable option because other departments would seek similar arrangements – however, given the priority afforded to the economy, the FSB would urge that dispensation be given to this area – a case of matching the commitment to economic priorities with decisive action.

Small Business Unit

As a result of recommendations in the Independent Review of Economic Policy the FSB welcomed proposals for the establishment of a small business unit within Invest NI.

It has long been our concern that not enough attention is given to indigenous small businesses, although programmes such as Boosting Business are addressing some areas of concern.

However, it is felt that a dedicated small business unit would allow for a specific focus on the sector to embed and create a greater sense of co-ordination in terms of support and listening to the needs and concerns of the dominant sector in the Northern Ireland economy.

Small Business Advice Centres

The FSB has called for the establishment of a network of grassroots Small Business Advice Centres throughout Northern Ireland which would be charged with signposting businesses through the maze of business support options and statutory bodies.

Whilst it is disappointing that this is not specifically addressed in some form within the strategy, the FSB can point, as partners, to a successful model currently being piloted by Castlereagh Borough Council - the Evolution Project. Although in its infancy, this project is operating in a fashion envisaged of a Small Business Advice Centre and the FSB would welcome an extension of this programme to other council areas.

There is significant potential for growth within sectors such as agri-foods, creative industries and social enterprise. As part of the implementation of the Review of Public Administration model of increased powers for local councils, the integration of such advice centres means these councils should have the capacity and local knowledge to act as independent brokers of support for local businesses.

Innovation/Research & Development

Innovation and R&D are key drivers of commercial enterprise and of the Northern Ireland economy. A good start was made with the Northern Ireland Regional Innovation Strategy, and it is hoped that the updated version will further engrain an innovation culture within local businesses.

The FSB also welcomes the Enterprise, Trade and Investment Committee Inquiry into Research & Development, as it helps to maintain focus on this key area. However, recommendations from this report must be implemented where they can be, rather than 'left on the shelf'.

Already there is a benefit, in that many businesses regard the Northern Ireland system for Research & Development grant assistance as better than that of the Republic of Ireland.

The innovation voucher system proved particularly popular amongst local businesses and should be at the forefront of the strategy to encourage connections between business and academia.

It is recognised that competition cannot be based on cost alone and therefore Northern Ireland needs to look at its Unique Selling Proposition (USP). There has been significant progress in this, and the Northern Ireland Knowledge Economy Index Report, launched by NISP Connect/Oxford Economics and the Northern Bank in November 2011, provides a realistic overview of where Northern Ireland is in

terms of the key sectors that are at the forefront of this USP.

Now is the time for the economic strategy to begin to turn the potential and investment into delivery. It will be a slow process but other areas such as the Republic of Ireland are moving ahead at a significant pace and Northern Ireland simply does not have the luxury of a gradual implementation mindset.

Tourism

It is disappointing that more economic measures are not detailed for the Tourism sector, for example given the prominence of sporting achievement and the opportunities for activity/product led tourism. The FSB would urge the department to address these in the forthcoming tourism strategy. In terms of value to the economy, over one-and-a-half million out of state visitors came to Northern Ireland in 2010 generating £336 million for the local economy. With this strong performance and potential for further expansion, **tourism requires recognition as a priority sector.**

Tourism has been identified as a key economic growth sector for Northern Ireland. This is welcome, but the FSB urges that the proposed Tourism Strategy must be signed off by the Executive as a matter of urgency. Tourism is one of the few industries that sustains employment throughout the rural parts of the province, often in areas that are well away from the main urban centres. It is essential that support is extended to all tourism providers in Northern Ireland, for example those serving the Sperrins area, and not simply restricted to the Signature Projects.

The FSB believes that tourism should be recognised as an ‘export’ sector, thus recognising many more small businesses as playing an active part in growing the ‘Northern Ireland export product’ and also becoming entitled to new avenues of assistance previously denied to them.

There is a clear lack of recognition given to tourism’s role as a shop window for developing positive perceptions of Northern Ireland internationally, although the FSB welcomes moves to grow specific areas such the ‘golf tourism sector’ with approval for the new Runkerry site etc.

The FSB believes that there is a correlation between this sector and the growth of FDI as the area becomes more attractive for international investors, for both work and leisure. It has been noted elsewhere that *tourism, by selling a significant share of its goods and/or services to purchasers outside of the country, is an export industry producing foreign exchange, thus bringing new money into the local economy.* Promoting Northern Ireland as a tourism destination creates an undercurrent of positive change. It positively positions Northern Ireland as a safe place to live, work, study, invest and visit.

Many other countries have economic strategies designed to rebuild their struggling economies. It is unclear in this draft strategy how Northern Ireland will differentiate itself as a destination and this must be made much clearer.

Small businesses have an essential role to play in delivering the Northern Ireland Tourist product.

Much of the innovation in the tourism sector is driven by small businesses and more support is needed to encourage further start-ups and greater innovation in existing businesses.

Many good quality small businesses have developed an expertise in retaining customers and maximising their yield from them. However, the marketing power of individual or even groups of small businesses is not enough to compete in a global marketplace. Therefore, they need support from the public sector to maintain and develop the necessary infrastructure to make them more accessible, to maintain and enhance the built and natural environment and to provide the kind of public facilities that visitors require.

Training remains an issue of concern, particularly in an industry with a high staff turnover where it is not known how long the investment will benefit the business that has invested in the training.

Tourism businesses also share the problems of other small businesses in the service sector of finding staff with the right attitude and basic skills.

While small businesses recognise the benefits of training, there can be a major cost implication in arranging cover for a staff member attending an external training course.

Although there have been improvements in recent years, especially through the further education network, training still tends to be concentrated in more urban areas, making it more difficult for the typical smaller businesses in rural areas to attend. New web-based training opportunities may be part of the answer to this but they need to be developed further.

The Signature Project programme is an exciting development which has the potential to regenerate many local areas. However there must be a coordinated, strategic partnership approach towards these projects to ensure that the local business community is engaged and is geared towards enhancing the visitor experience.

Skills

The skills strategy is a key element of the wider economic development process and it is vital that the upheaval in departmental responsibilities with the proposed abolition of DEL does not have a negative effect on the delivery of the programmes.

There is clearly a need for up-skilling, however, this should be consistent with the needs of industry and an improvement in leadership and management training. There was previously an excellent online learning tool for business managers through the Management and Leadership Network, which allowed usage in times which suited. This use of technology is exactly the type of innovative approach which

continues to be required.

The change in ambition must be underpinned by young people becoming enthused by seeing other successful young people. Practical areas such as having a LinkedIn profile and networking are every bit as important in today's career development as more conventional avenues.

Programmes such as the US-NI Internship have shown what is achievable and illustrate the type of format in which the entrepreneurs of tomorrow can be identified.

Rebalancing Targets

- The development of university spin outs will be a key element of galvanizing the innovation culture, so the target of just eight of these by 2013 seems a little conservative. In 2011, the Office of Innovation at the University of Ulster reported that four new companies were being spun out and, when taking into account the opening up of IP portfolios, and the work being undertaken by Queens University, a more ambitious target would be welcome.
- The considerable work ongoing around STEM is welcome and it is important that this work continues – promoting the message more effectively must also be a priority, to engage both with business owners/managers and the learning generations.
- The culture of promoting knowledge transfer projects within the context of problem solving skills would be an innovative approach to engaging constructively with young people in education.

Construction Industry

Construction industry assistance is to be welcomed, however not just for social housing support but other infrastructure projects to stimulate growth.

There is still considerable negative feedback in relation to the planning process in Northern Ireland. While it is acknowledged that there have been efforts to streamline decision making and be more pro active, many key projects which could act as stimuli for the construction industry remain bogged down by indecision and

seemingly endless inquiries and appeals.

Reform of the planning service must be a priority if we are to attract new FDI and indigenous growth. In particular, the potential growth displayed by the renewable energy sector may well be curtailed by this issue, which would not only have economic concerns but would have further implications of failing to meet EU targets.

There must be robust policies to develop competition in the energy sector to reduce the cost burden to business and consumers, and unleashing new infrastructure construction work will be a key factor in this.

Conclusions

The strategy demonstrates an understanding of the key issues facing Northern Ireland as it seeks to grow the local economy. However, it does not give sufficient weight to the crucial role that tourism will play in creating prosperity, especially in respect of the many small businesses without an export capability but which employ significant numbers and will play a crucial role in supporting larger projects and events throughout 2012 and beyond.

Previously it was suggested that consideration should be given to the new brand 'Innovate NI' – however there has been a change in outlook with many businesses now viewing this as an irrelevant rebranding. Of more concern is the attitude towards risk by those charged with economic development and the need for a more entrepreneurial spirit to be adopted.

There is a considerable migrant working population in Northern Ireland, many of whom have skills and experience which could be encouraged in a much more entrepreneurial sense. Allied to this is the applicability of the 'UK Start up visa' which receives little coverage in Northern Ireland. Consideration should be given to promoting that untapped potential source of economic growth.

It is understood that this must be complemented by a more flexible spirit in the wider public sector and lessening of the fear of the public accounts committee. Of course, the PAC has a role to play, but there is a feeling that it simply does not recognise that an entrepreneurial spirit requires a greater degree of freedom; things will inevitably go wrong but real growth will only be achieved through radical action.

Appendix 1 – FSB Survey – 2011 Results

Executive Summary

Financial performance/finance

- The majority of Northern Irish members claim to have used finance to support their main business over the past 12 months. Bank overdraft, members' own savings/inheritance and retained profits are the most common sources of finance.
- The principal reason for members to apply for financial support is to ensure cash flow.
- On average borrowers have sourced £73,900; considerably higher than the UK average of £53,600. Northern Irish borrowing has decreased over the past two years; £78,600 was reported in 2009's survey.
- The mean average rate of interest across all borrowers is 5.9 per cent.
- The mean turnover of Northern Ireland's FSB member businesses in the past financial year is £743,000 compared to £830,000 in 2009. Around six in 10 Northern Irish members have experienced a decline in profitability and sales volume over the past 12 months.
- Members are not as optimistic about the business climate over the next 12 months as they were in 2009. Fourteen per cent believe it will improve while two-fifths believe it will deteriorate.

Payment/procurement

- Payment in arrears is the most common payment term amongst member businesses. For those accepting payment in arrears, the most common terms are 28 to 30 days.
- Sixty-eight per cent of Northern Irish FSB members trade with the private sector; over half supply the public sector.
- Compared to 2009, almost all customer sectors show an increase in late payments this year. Of those members supplying local authorities/councils, 56 per cent have suffered from clients paying late, up 19 per cent on 2009.
- Around seven in 10 Northern Irish member businesses indicate that there are barriers for small firms in bidding for public sector contracts. The time and cost of participating in the tendering process and a lack of awareness of contracts available are the most common obstacles.

Business support

- To support their business, Northern Irish members have accessed a wide

variety of support sources over the past year, principally from customers, suppliers, accountants and banks.

- The largest proportion of members identify accountants, family/friends and customers as the most helpful sources of business support over the past year.
- While a greater proportion of members have sought support for their business over the past 12 months compared to 2009, there is a fairly steep general decline in the helpfulness ratings.
- Improved business support and more accessible procedures for public procurement, are the most commonly selected Local Authority/Local Government initiatives to support Northern Irish businesses; around three in 10 highlight each option.
- The greater proportion of Northern Irish members are ambivalent about the business services provided by their Local Authority. Just 15 per cent claim to be satisfied with them; 36 per cent are dissatisfied.

Employment

- The average workforce of Northern Irish FSB member businesses stands at 8.6, down from 9.5 in 2009. While overall staffing levels remain broadly consistent, members are making greater use of casual/seasonal staff than they did two years ago.
- Compared with 12 months ago, a fairly high proportion of Northern Irish FSB members indicate a decrease in the number of staff they employ; net decreases are indicated in all areas of staffing.
- Looking forward to the next 12 months, a higher proportion of businesses indicate employee levels will remain constant across the different staff types. There is evidence of some positivity from members, as part-time and temporary staff show net increases in planned employment.

Innovation

- The majority of Northern Irish FSB members have been innovative over the past two years; 67 per cent have introduced new or improved products/services, representing a 13 per cent increase on 2009.
- The same proportion plan to maintain this level of innovation over the next 12 months; an uplift of 14 per cent since 2009.
- Amongst those Northern Irish members who have introduced new products or services in the past two years, just under a fifth claim this has contributed to over 30 per cent of revenue.
- Northern Irish members are reliant on the internet for running their business; email, downloading information and paying bills or tax returns online are

activities carried out by the vast majority.

Business growth

- Business growth has been an objective for two-fifths of Northern Irish FSB members over the past 12 months; 46 per cent of these businesses achieved growth in sales and 31 per cent in profitability.
- Looking forward, a greater proportion of businesses (62%) are targeting growth for the next 12 months compared to last year. Given this, it is not surprising that the majority indicate they are looking to expand their client base.
- The majority of Northern Irish FSB members identify the economy as the biggest barrier or obstacle to success; 69 per cent say this. Although this figure has decreased by seven per cent since 2009's study when the UK economy had just crept out of recession, it is nevertheless still a substantial proportion of members.

Business profile

- This year's sector profile of Northern Irish members' businesses is similar to that of the 2009 survey with retailing, and construction and building related activities again featuring prominently.
- The majority of members (74%) own/co-own and manage a single business; in terms of legal status there is a fairly even split between limited companies (43%) and sole traders/sole proprietorships (37%). The average length of business ownership for Northern Irish members is 13.7 years.
- Forty-four per cent of Northern Irish members operate their business from rented premises; 41 per cent own business premises. Around nine in 10 of those who own or rent premises pay business rates.
- Twenty-two per cent of those who have an awareness of the current rateable value of their business premises indicate that it is £5,000 or less, for 27 per cent their premises has a value over £75,000 or above. Just under a fifth are in receipt of SBRR (Small Business Rates Relief).
- Seventy-seven per cent of Northern Irish FSB members are male; the greater proportion are aged between 55 and 64. Around two-fifths of Northern Irish FSB members have a Bachelor's Degree or higher.

Section 2: Business profile

2.1. Geographical distribution

A total of 258 responses were received from FSB members in Northern Ireland.

Distribution of responses across Northern Ireland		
Region	Belfast	22%
	Non Belfast	78%
<i>Base:</i>		258

Consultation on the Northern Ireland Executive Draft Programme for Government 2011-15



Northern Ireland Fuel Poverty Coalition Consultation Response February 2012

Northern Ireland Fuel Poverty Coalition

The Northern Ireland Fuel Poverty Coalition welcomes the opportunity to respond to the Northern Ireland Executive consultation on the Draft Programme for Government 2011-2015.

The Northern Ireland Fuel Poverty Coalition was launched on 1 November 2010 in response to the increasing levels of fuel poverty in Northern Ireland.

The Fuel Poverty Coalition currently has over 150 member organisations and individuals from across Northern Ireland¹. We have come together to highlight the impact of fuel poverty on people, to examine practical solutions to this crisis and to demand that the NI Executive tackles this serious problem urgently.

¹ Our members represent local councils, MLAs, businesses, environmental groups, trade unions, the health sector, consumer groups, housing associations, rural support networks, the voluntary sector, student unions, young persons groups, older persons groups and faith groups.

Background

The latest official government statistics on fuel poverty in Northern Ireland show that 44 per cent of households (302,000) were in fuel poverty in 2009 (i.e. spending at least 10 per cent of income on heating and lighting their homes), and that 13 per cent of households (75,000) were in extreme fuel poverty (spending at least 20 per cent on heat and light).

Since 2009, households in Northern Ireland have suffered two of the coldest winters on record and experienced significant increases in energy prices:

- The cost of heating oil has risen 83 per cent²;
- Electricity prices by up to 18.6 per cent; and
- Gas prices have risen by up to 39.1 per cent.

Fuel poverty levels in Northern Ireland are considerably higher than in Great Britain and the Republic of Ireland as shown in the table below. We also have higher energy bills than Great Britain, due largely to our reliance on home heating oil (67 per cent). The highest energy bill in GB³ is around £1,000 cheaper than the average combined oil and electricity bill in Northern Ireland⁴.

	% of households in Fuel Poverty	% of households in Extreme Fuel Poverty
England	18	3
Wales	26	5
Scotland	33	10
Northern Ireland	44	13
Republic of Ireland ⁵	19	Not available

Medical and academic evidence shows that fuel poverty can damage an individual's quality of life and health. It also imposes wider costs on society, through the cost of treating ill health

² Source: CCNI home heating oil survey.

³ £1,100 in Cardiff, source: Department of Climate Change and Energy.

⁴ £2,114 based on an average household electricity consumption of 3,300kWh and using five and a half 500 litre fills of oil per year.

⁵ Scott, S. et al. Fuel poverty in Ireland: extent, affected groups and policy issues. Working

caused by living in a cold home. For example, one of the UK Government accepted indicators of fuel poverty is the number of people who die in winter from cold related diseases such as heart attacks, strokes and respiratory disease. The 2010-2011 there were 741 excess winter deaths in Northern Ireland, which compares to a level of 224 excess winter deaths in 2001/02⁶.

The current Assembly term is crucial in ensuring a successful and sustainable response to the fuel poverty crisis that Northern Ireland is currently experiencing. It is essential that fuel poverty is comprehensively tackled in the short to medium term before keeping warm becomes simply unaffordable for the vast majority of households in Northern Ireland.

Northern Ireland Fuel Poverty Coalition Consultation Response

The draft Programme for Government 2011-2015 contains one key commitment in relation to fuel poverty: to “Introduce and support a range of initiatives aimed at reducing fuel poverty across Northern Ireland including preventative interventions”

The Fuel Poverty Coalition acknowledges the NI Executive’s commitment to reducing fuel poverty levels in Northern Ireland. However, given the high levels of fuel poverty and the severity of the problem, we are concerned that the draft PfG does not commit to eradicating fuel poverty and that it does not set any targets for reducing fuel poverty levels.

We are also concerned that the document does not make reference or commit to any specific initiatives other than to “improve the thermal efficiency of Housing Executive stock and ensure full double glazing in its properties”.

It is imperative that NI Executives commits in the final Programme for Government 2011-2015 to:

- **Develop a detailed and costed action-plan setting out how and when fuel poverty will be eradicated in Northern Ireland; and**
- **Provide continued support to households in severe fuel poverty to stay warm until fuel poverty is eradicated.**

⁶ Source: Northern Ireland Statistics and Research Agency (NISRA).

The key components of the action plan should contain a commitment to delivering **at least** the following seven key actions:

- 1 **Establish a Ministerial Task Force with a duty to eradicate Fuel Poverty in Northern Ireland:** the task force must focus on delivery and bring coherence to achieving clear targets to tackle fuel poverty.
- 2 **Area Based Insulation Programme:** the Warm Home Scheme should adopt a targeted local area based approach as piloted in the Beechmount and Willowfield areas of Belfast.
- 3 **Energy Brokering:** use the purchasing power of the Government's estate and industry to negotiate lower heating oil, natural gas and electricity tariffs/prices for fuel poor households.
- 4 **Energy Regulation:** re-examine how the Strategic Energy Framework for Northern Ireland can be strengthened to ensure energy regulation delivers the lowest possible prices.
- 5 **Oil Regulation:** Develop a strategy to significantly reduce NI's reliance on home heating oil (HHO) and in the interim, explore a range of options to regulate the HHO industry in NI, giving fuel poor households clarity on prices, quality customer service standards and safe HHO systems.⁷
- 6 **Winter Fuel Allowance:** Ahead of winter 2012, the NI Executive needs to examine the best use of additional public funds (e.g. Social Protection Fund /Social Investment Fund) to support people in fuel poverty.
- 7 **Increasing Benefit Uptake:** An estimated annual £73 Million in benefits goes unclaimed in Northern Ireland every year. The NI Executive must ensure that people eligible for existing benefits claim them.

Conclusion

The current fuel poverty levels in Northern Ireland are simply unacceptable. The Fuel Poverty Coalition firmly believes that cold housing and fuel poverty can be successfully tackled if there is a political will to do so. What is needed is an urgent and coordinated response from the NI Executive and NI Assembly.

It is imperative that the NI Executive includes a written commitment in the final Programme for Government document to develop a detailed and costed action-plan to eradicate fuel poverty in Northern Ireland and to provide support to all households in extreme fuel poverty in the short term.

⁷ Off Grid Energy, October 2011, OFT stated that it was oddity of the NI market that the most common used heating fuel (heating oil) is unregulated whilst the less common natural gas is fully regulated.

Tackling fuel poverty presents clear benefits across a number of key priority areas included in the draft Programme for Government. These include economic growth, improvements and savings on health and wellbeing, reduction in carbon emissions and poverty in general. Therefore the inclusion of an action plan that contains at least the eight practical solutions that we outlined in our consultation response, represents a win-win-win-win scenario for the NI Executive.

If the NI Executive fails to deliver an urgent, decisive and coordinated response to the fuel poverty crisis in Northern Ireland, the stark reality for an increasingly large number of households in Northern Ireland is that they will continue to struggle to heat their homes to an adequately level for the duration of the current Assembly term. NI households deserve better than that.



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