

Walker V

Dear First Minister/deputy First Minister, This is my response to the consultation on the Draft Programme for Government (PfG) 2011-2015.

There is an intense focus in the PfG upon growing the economy and this is as it should be in these difficult times. However this should not be at the expense of the natural environment because 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.

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

- 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 recent example, which has seen shameful indecision between 2 Stormont Departments for over 10 years, is that of the protection needed for horse mussels in Strangford Lough. (Strangford is one of our most beautiful areas and could significantly help to increase eco tourism.)

- A Northern Ireland Marine Act which ensures a framework for healthy seas and protection for a range of marine species and ensure we do not continue to lag behind others in protecting and appropriately utilising resources in our coastal waters.

- 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.

- Increased funding for rural development to allow all farmers to be brought into agri-environment schemes. These are one of the main ways of supporting rural communities by providing financial support to farmers and creating significant socio-economic benefits. rural poverty is real and increasing.

- 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, promote long-term societal benefits, and deliver improved health and wellbeing.

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

Yours sincerely, V Walker

Ward A

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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:

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- 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.
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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 Ward

WCRP



Programme for Government Consultation Response

Issued by: Northern Ireland Executive

February 2012

Women's Centres Regional Partnership (WCRP)

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1.0 Introduction WCRP

1.1 WCRP Vision

"Our vision is of communities where women are recognised and valued as equal partners working towards a future based upon shared values of equality, participation and inclusion."

1.2 WCRP Mission Statement

"To work in partnership to support and strengthen the voice of community based women's organisations"

1.3 Background

The Women's Centres' Regional Partnership (WCRP) is a partnership of four lead regional women's organisations linking with fourteen frontline women's organisations across Northern Ireland to provide support and services to women living in disadvantaged areas.

1.4 The four key lead partners of the Partnership are the Women's Resource and Development Agency (WRDA), Women's Support Network (WSN), Northern Ireland Rural Women's Network (NIRWN) and The Women's Centre, Derry. The fourteen Women's Centres are spread across Northern Ireland with seven from the Greater Belfast and Lisburn area, four in the North West (one of which does not provide childcare), and three in Dungannon, Magherafelt and Craigavon. Together the WCRP seeks to develop and strengthen a regional infrastructure which will support community based women's organisations across Northern Ireland.

1.5 There are four aims to the Partnership encouraging collaborative and strategic work on key areas such as influencing policy, identifying needs and gaps in relation to training, education and childcare services, improving communication on good practice and lessons learnt across the sector, sourcing potential sources of funding, etc.

- 1.6 The Women's sector has played a key role in building and promoting, social, economic and political change in Northern Ireland. A review carried out in 2001 highlighted that through its infrastructure, comprising regional support organisations, networks, women's centres and local groups engaged in a diverse range of activities, it has made a valuable contribution to promoting equality, social and economic inclusion, peace-building, and the development of the voluntary sector.
- 1.7 The WCRP tackles women's inequality and disadvantage and supports community development in the most marginalised and disadvantaged communities and works for policy change. The principles of interdependence, co-operation, participation, representation and good practice is at the heart of the partnership's work.
- 1.8 The WCRP welcomes the opportunity to comment on the *Programme for Government*.

2.0 General Comments

- 2.1 WCRP welcomes the opportunity to respond to the Programme for Government issued by OFMDFM.
- 2.2 We wish to raise the issue of time and sequencing of the Budget, Programme for Government and the EQIA. We have serious concerns this Programme for Government was presented sometime after the budget; not to mention the EQIA which did not appear for weeks after. WCRP would like to see the Northern Ireland Executive take this process seriously and make the necessary changes so that future decisions and processes are developed in a logical and coherent manner.
- 2.3 WCRP very much welcomes the emphasis on 'Creating Opportunities, Tackling Disadvantage and Improving Health & Wellbeing.' We believe this priority will help in reducing inequalities, especially for women and their families in relation to poverty, income, work opportunities and education.
- 2.4 Although we agree in principle with all the priorities contained within the consultation, there is an urgent need for a robust action plan and delivery programmes to ensure the priorities are fit for purpose and that Departments are indeed meeting outputs.
- 2.5 We are disappointed that a gender perspective has not been mainstreamed in the Programme for Government or preceding budget. OFMDFM has highlighted in the Gender Equality Strategy that "the gender perspective will be taken into account during the whole process of policy development in all the Government functions."¹ The Council of Europe has published a handbook on Gender Budgeting and defines

¹ OFMDFMNI *Gender Equality Strategy: A Strategic framework to promote gender equality for women and men 2006-2016*, Pg 35.

gender budgeting as “an application of gender mainstreaming in the budgetary process.”² According to the Council of Europe, gender budgeting involves three stages including analysis involving gender disaggregated data, determining the differential impact of the budget between men and women; reformulation of policies and redistribution of resources to ensure gender equality outcomes; and embedding gender equality within all budgetary processes.

WCRP believes the approach highlighted in the Council of Europe’s handbook is vital to ensure that equality of opportunity on the grounds of gender is embedded in the budgetary process. WCRP recommends that OFMDFM and other government departments in future adopt the approach published by the Council of Europe in its guidance on gender budgeting thus ensuring gender equality in budgetary processes.

- 2.6 It is our strong belief that CEDAW (Committee on the Elimination of all forms of Discrimination Against Women) should be unified across the whole of the UK, including devolved regions such as Northern Ireland. In paragraph 263 of the follow up concluding reports it states that *‘the principal responsibility for implementation of the Convention lies with the Government of the United Kingdom’*.³ Without this, the unequal position of women within Northern Ireland will continue. We are therefore requesting that the Northern Ireland Executive incorporates the principles of CEDAW into domestic legislation to promote the rights of and equality of women within Northern Ireland.

3.0 Priorities

- 1.1. 3.1 **Growing a sustainable Economy and Investing in the Future**
– We are extremely disappointed that the **Childcare Strategy** has not been given consideration within this priority. Parents need access to high quality, accessible and affordable childcare services in order to be

² Council of Europe (2009) *Gender Budgeting: Practical Implementation handbook*, Pg 5.

³ <http://www2.ohchr.org/english/bodies/cedaw/followup.htm>

able to reconcile their caring and work/education demands⁴. Childcare is one of the key barriers preventing women from accessing employment and a barrier to equality in the workplace. A report by the Women's Centres Regional Partnership (WCRP) identified lack of appropriate childcare as the single biggest barrier to women's participation in education, training and work, as well as public and political life.⁵ The report made a number of recommendations including the development of an integrated childcare strategy for Northern Ireland and increased provision of local, high quality, affordable and flexible childcare.⁶ The Law Centre NI also cited childcare as a barrier to employment stating that "any child poverty strategy needs to make progress in this area if the route to work is to be a meaningful route out of poverty."⁷ The Law Centre NI also raised concerns during the Committee stages of the Welfare Reform Bill regarding obligations for lone parents with children aged seven or over to look for employment from 2010, given that there is no childcare strategy or childcare infrastructure in place in NI.⁸

It is well documented that there is a lack of childcare provision in Northern Ireland. Furthermore, the childcare settings which do exist are unevenly distributed across the region. Rural areas have the lowest level of childcare provision. 71% of all childcare settings in Northern Ireland exist in the east of the region (within the Northern, South Eastern and Belfast Health and Social Care Trust Areas). The remaining percentage of childcare settings are found within the, mostly rural, Southern and Western Health and Social Care Trust Areas.

⁴ For the purposes of this section childcare denotes the care of children that is provided through registered formal daycare services.

⁵ H McLaughlin (2009) *Women Living in Disadvantaged Communities: Barriers to Participation*, Report written on behalf of WCRP.

⁶ Save the Children: *Measuring Severe Child Poverty in NI*, January 2010

⁷ H McLaughlin (2009) *Women Living in Disadvantaged Communities: Barriers to Participation*, Report written on behalf of WCRP, pg 37

⁸ Law Centre NI *Working Together To Reduce Child Poverty Seminar: The Child Poverty Act 2010*, May 2010

Without adequate and affordable childcare provision, parents struggle to access work and stay in work. The second Childcare Costs Survey (2011) carried out for the region by Employers for Childcare revealed that for 46% of respondents the cost of childcare influenced the hours they work. In addition to this many families struggled with their childcare costs. 45% of the average net salary is allocated to childcare for one child⁹.

The 2005 review of the Northern Ireland Childcare Strategy (1999) also recognised the need for a strategy, stating that the “*availability of affordable childcare has been identified as a barrier to parents hoping to return to work*”¹⁰. More recently the First and Deputy First Minister outlined the need to empower parents back into employment through access to childcare in the Northern Ireland Child Poverty Strategy.¹¹

Childcare policy in Northern Ireland has suffered neglect. This is evident given that the themes of the first Childcare Strategy for the region, *Children First (1999)* still remain relevant. Furthermore, childcare policy and development in the region lags behind the rest of the UK where childcare services have been elevated to a statutory footing.

Rural Childcare

A report ‘Investing in the Future’ on the demand for and supply of rural childcare found evidence that affordability, availability and accessibility are the main problems in relation to rural childcare for parents.¹²

Finding affordable accessible childcare is one of the biggest challenges for working parents, and one of the highest costs. A review of “Children First”, the Northern Ireland Childcare Strategy published in

⁹ Employers For Childcare Charitable Group (2011) Northern Ireland Childcare Costs Survey 2011, EFCG

¹⁰ DHSSPS (2005) Review of Children First Final Report, August 2005, p46, DHSSPS

¹¹ NIE (2010) Improving Children’s Life Chances, The Child Poverty Strategy , p1, NIE

¹² Investing in the Future, Rural Childcare, June 2008, Rural Childcare Stakeholder Group

1999, found that over the five years of the strategy, the number of childcare places increased by only 5.7%. This was largely due to the increase in the number of day nursery places, the majority of which are private. Currently there is the equivalent of one childcare place for every 6.4 children under four.¹³

In 2009 there were 1364 individual children registered for childcare within Women's Centres¹⁴. This equates to 9828 hours of childcare provided weekly mainly for children age 0-4 years funded by the Department of Social Development through the Women's Centres Childcare Fund. The Executive and DARD therefore must recognise the importance of a childcare strategy and place it at the heart of growing a sustainable economy and investing in the future of Northern Ireland. There are long-term benefits of subsidised childcare which enables parents to receive training, gain employment and to stay in employment. We advocate for the mainstreaming of successful childcare projects both in urban and rural areas and for the continuation of the Women's Centres Childcare Fund funded through the Department for Social Development.

3.1.1 Apart from the labour market indicators relating to the economic inactivity of women highlighted in the EQIA, there is no mention within the Programme for Government. It is not enough to recognise these issues but policy solutions must be brought forward to tackle the problems. Women are less well connected to the labour market¹⁵ and are concentrated in part-time jobs with the largest pay disparity being for female part time workers.¹⁶ Women are also more likely to experience interruptions to their careers to take on caring

¹³ A 2020 Vision Ending Child Poverty in NI, Annual Report 2007, Save The Children

¹⁴ Childcare Mapping and Research Report – Women's Centres Regional Partnership (2010)

¹⁵ DETI (2009) Women in Northern Ireland, DETI

¹⁶ Northern Ireland Assembly (2011) The Gender Pay Gap, OFMDFM

responsibilities and this has a negative impact on their future career and earnings.¹⁷

It is not enough to rely solely on the Creative Industries Innovation Fund to assist women in to employment. WCRP recommends that girls and women are encouraged to pursue the STEM (Science, Technology, Engineering and Maths) subjects. This is essential and must be written in to DEL's and DE's delivery plans and actions which will challenge gender stereotypes, particularly in STEM subjects and increased uptake of STEM subjects by girls.

WCRP would like to see community education given more prominence within the Programme for Government. It is often Women's Centres who provide that first step back into learning for women, and it is often these personal development courses which provide a strong foundation to move on to other skills based courses. Women's Centres often remove the many barriers women face with formal education systems. Research by the Women's Centres Regional Partnership (WCRP)¹⁸ illustrated barriers faced by women from disadvantaged backgrounds which can lead to social and financial exclusion. These include lack of access to adequate and affordable childcare, limited skills, qualifications and experience and confidence which can impede women in entering/re-entering education, training and employment. It is therefore extremely important that the necessary investment is made to allow women's centres to continue providing training courses and skills courses to women living in areas of disadvantage to allow them to access training and employment opportunities.

¹⁷ Ibid.

¹⁸ Women's Centres Regional Partnership 'Women living in disadvantaged communities: barriers to participation' (2009) available at www.wcrp.org.uk/cms/data/upimages/Barriers_to_Participation_-_FINAL.pdf

3.2 **Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing** – we are pleased that the Executive is committed to addressing inequality and tackling disadvantage. However, we fail to see how ‘introducing changes to the welfare system’¹⁹ will help. The effects of Welfare Reform are yet to be realised however it is accepted that Northern Ireland will be hit hardest. In a report commissioned by the Law Centre NI, the Institute of Fiscal Studies established that after London, the tax and benefits changes planned up to 2014-2015 will have a disproportionate impact on NI. This is for two reasons: the high numbers of those in receipt of Disability Living Allowance, especially for mental health disorders, and the high number of families with children who will be adversely affected by cuts to social security.²⁰ Anticipated job losses within the public sector will hit women hardest since significantly more women are employed in low paid public sector jobs, they will therefore bear the brunt of these public spending cuts, with subsequent devastating impact on the life chances of their children. We believe many women and their families will struggle (women comprise 53% of benefit recipients in Northern Ireland) especially in relation to reduced benefit entitlement, childcare costs and the intended poor delivery arrangements with proposed monthly payments which could mean many families finding it difficult to budget over lengthy periods. A report by the Women’s Resource & Development Agency²¹ provides an evidence base detailing women’s position in the economy, employment, childcare, pensions, welfare, debt and credit as well as housing and fuel debt.

3.2.1 Child poverty figures are stark; with figures for 2009-10 showing a 14,000 increase in the number of children in poverty. Northern Ireland has 28% of children growing up in poverty, with the figure for the whole

¹⁹ Programme for Government (2011)

²⁰ James Browne, The Impact of tax and benefit reforms to be introduced between 2010-11 and 2014-15 in Northern Ireland, IFS Briefing Note 114, December 2010

²¹ WRDA Report (2011) *The Northern Ireland Economy: Women on the Edge?, Bronagh Hinds* (p117) Available at <http://www.wrda.net/Documents/The%20NI%20Economy%20-%20Women%20on%20the%20Edge%20Report.pdf>

of the UK standing at 20%. The Child Poverty Act 2010 is meant to ensure that action to end child poverty will be a priority for the current administration. The legislation highlights education, childcare, health, family support, financial assistance, employment, skills and housing as crucial elements in the battle to end child poverty. The Northern Ireland Executive and other UK jurisdictions have signed up to the eradication of child poverty by 2020. WCRP is disappointed at the lack of ambition, targets and progress on the Child Poverty Strategy. We therefore ask that the Child Poverty Strategy is given greater importance within the Programme for Government and that an outcomes model is developed as a matter of urgency. The statistics outlined above are truly indefensible. It reinforces the need for urgent action to prioritise them, with a focus on early intervention, prevention, early years and family support.

3.2.2 WCRP is pleased that the Executive will work on closing the gap in educational underachievement. Northern Ireland has a higher proportion of working age population with no qualifications (20.3%) compared with the UK average of 10.5%. Within areas of disadvantage, children in receipt of free school meals only 29.7% achieved 5 GCSEs A* to C, including English and Maths, compared to 63.6% students who did not receive free school meals.²² Statistics from some of the most disadvantaged wards in west Belfast show that more than 80% of the young people are leaving school with no or low qualifications – at a time when the EU has a 2020 target of 40% entering higher education.²³ WCRP therefore call for the Executive to focus on early intervention, prevention, early years and family support. We believe this is the only way to ensure that children living in areas of disadvantage are given a better start in life and ensure better socio-economic outcomes.

²² DE STATISTICAL PRESS RELEASE Qualifications and Destinations of Northern Ireland School Leavers 2008/09, quoted in Save the Children briefing, Better Odds at School, 2010

²³ Save the Children briefing, Better Odds at School 2010 p2

3.2.3 WCRP is pleased that one of the building blocks to priority two is the UN Convention on the Rights of the Child. However, we would like to see the Programme for Government place at its foundation the principles of the UNCRC with particular emphasis on Article 18. 2: for the purpose of guaranteeing and promoting the rights set forth in the present Convention, States Parties shall render appropriate assistance to parents and legal guardians in the performance of their child-rearing responsibilities and shall ensure the development of institutions, facilities and services for the care of children. Article 18.3: parties shall take all appropriate measures to ensure that children of working parents have the right to benefit from child-care services and facilities for which they are eligible. Article 27.1: parties recognise the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development. In order to achieve this, WCRP would like to see greater co-operation and collaborative working in across all departments a link with the Ten Year Strategy for Children and Young People and the Children and Young People's Plan through the Health & Social Care Boards, which will be key drivers for meeting the needs of children.

3.3.1 WCRP welcomes the Executive's aim to set to **build a strong and shared community**. WCRP is disappointed that no reference has been made of the role women and women's community based organisations in promoting good relations particularly those organisations situated in areas of high levels of socio-economic disadvantage or situated within interface areas and areas experiencing the most demographic change due to inward migration in recent years, and these are the areas which have been most affected by the conflict. For example, women's community based organisations and women's centres offer childcare, education and training classes which have been accessed by women from different religious backgrounds, race and sexual orientation.²⁴

²⁴ WRDA (2007) *Is Gender Part of Good Relations?: Report of a Conference on a Shared Future*, pgs 24-26

WCRP urges the Executive to ensure women are fully recognised in this priority and to recognise the role of women's community based organisations in promoting good relations through their services provided to women with multiple identities such as race, political opinion, religion and sexual orientation.

3.3.2 WCRP calls for the full implantation of UN Resolution 1325 on Women, Peace and Security, which recognises the important role of women in the prevention and resolution of conflicts and in peace building.²⁵ Most women's groups and organisations' grassroots work is crucial to the elimination of sectarianism. Those groups work in disadvantaged and marginalised areas, the same areas that suffer most from the blight of sectarianism. Given that the plethora of community organisations' leadership and decision-makers are mostly male, the lack of women's influence and input into strategies and models for tackling issues such as sectarianism can only set its elimination back. Our members work is vital to encouraging and enabling women to go forward in their community as leaders and sit on boards and committees that draw up community strategies for dealing with community relations issues. The necessity of women's equal representation at all levels of society is recognised internationally as a prerequisite to a fair, equal and peaceful society, the value of the women's sector's work is integral to this. We call on the Executive to work with the UK government to implement this UN Resolution in Northern Ireland and to recognise the role of women in peacebuilding in good relations strategies.

4.0 Conclusion

4.1 Some of the key goals outlined in the Programme for Government document dovetail with the key priorities within the community based women's sector. WCRP have been working with our members to

²⁵ http://www.un.org/events/res_1325e.pdf

improve pathways to employment, tackle systemic issues linked to deprivation and increase community services for women and their families. We are fully committed to reducing child poverty and tackling rural poverty and isolation. The community based women's sector will continue to deliver practical outcomes through targeted community education initiatives, childcare provision and a range of services which seek to reach out and include marginalised and 'hard to reach' women.

4.1.1 However, the community based women's sector cannot achieve these goals in isolation. WCRP is disappointed there has been no recognition of the work carried out by the community based women's sector in delivering programmes that assist women in to employment and help tackle poverty and social exclusion. The work of the community based women's sector must be recognised within the Programme for Government. Without this recognition, WCRP is concerned the community based women's sector will not be able to continue this valuable work without infrastructure support.

4.1.2 WCRP welcomes the opportunity to respond to this consultation document. Whilst welcoming the Programme for Government, we have offered some constructive recommendations as to how it could be improved. We are happy to further discuss this response if required.

Appendix 1:

Lead Organisations:

NI Rural Women's Network (NIRWN)

15 Molesworth Street
Cookstown
BT80 8NX

The Women's Centre, Derry

Beibhinn House
5 Guildhall Street
Derry
BT48 6BB

Women's Resource and Development Agency (WRDA)

6 Mount Charles
Belfast
BT7 1NZ

Women's Support Network (WSN)

109-113 Royal Avenue
Belfast
BT1 1FF

Partners:

Waterside Women's Centre

170 Spencer Road

Waterside

Derry

BT47 6AH

Foyle Women's Information Network

The Walled City Community Partnership

12-14 The Diamond

Derry~Londonderry

BT48 6HW

The Women's Centre

Beibhinn House

5 Guildhall Street

Derry

BT48 6BB

Strathfoyle Women's Centre

12 Bawnmore Place

Strathfoyle

BT47 6XP

Atlas Women's Centre

81 Sloan Street

Lisburn,

BT27 5AG

Ballybeen Women's Centre

34 Ballybeen Square

Belfast

BT16 2QE

Falls Women's Centre

256 - 258 Falls Road

BELFAST

BT12 6AL

Footprints Women's Centre

84a Colinmill

Poleglass

Dunmurray

BT17 0AR

Greenway Women's Centre

19 Greenway

Cregagh Road

Belfast

BT6 0DT

Windsor Women's Centre

136-144 Broadway

Belfast

BT12 6HY

Shankill Women's Centre

151-157 Shankill Road

Belfast

BT13 1FD

First Steps Women's Centre

21a William Street

Dungannon

Co Tyrone

BT70 1DX

Magherafelt Women's Centre

The Learning Lodge

27-29 Moneymore Road

Magherafelt

BT45 5JE

Chrysalis Women's Centre

520 Burnside

Brownlow, Craigavon

BT65 5DE

Webster E

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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 WEBSTER

Weekes BC

Re: walking/Cycling to school

Dear Minister, In response to the Draft PFG I write to ask that the aims of the draft document, providing the facilities for 36% of primary school pupils and 22% of secondary school pupils, be included in the final PFG.

Yours, B C Weekes



West Belfast Partnership

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A Response to: *draft Programme for Government 2011-2015*

Issued by: Northern Ireland Executive



22nd February 2012

Introduction

The West Belfast Partnership (WBP) welcomes the opportunity to submit a response to the Draft Programme for Government 2011-2015 (draft PfG) and recognises the Programme's potential to create significant, positive change for all the people of the North.

The West Belfast Partnership Board is a coalition of interests, which seeks to involve everyone who works and lives within West Belfast in the task of generating economic, social, physical, cultural and educational development in an inclusive and accountable manner. Its aim is to improve the quality of life for West Belfast residents and to also contribute positively to the development of the city as a whole.

The mission of the Partnership is to “involve people who live and work in West Belfast in generating social, economic, physical and cultural development and to ensure West Belfast makes a full contribution to and benefits equitably from, developments in the city as a whole”. Key areas of work include: Economic development, Housing, Planning and Environment, Health and well being, Jobs

taskforce, Education & Aisling Bursaries, Neighbourhood Renewal & Strategic Regeneration.

The Partnership seeks to do the following:

- Lobby on behalf of West Belfast to improve employment opportunities, investment and job creation for people living here.
- Raise awareness of the educational needs of our children, young people and adults, advocate for additional resources and provide west Belfast wide education programmes such as our Easter and summer schools.
- Influence government policy by actively representing the views and opinions of local people and organizations on a range of environmental issues including housing, leisure and play, planning and transport.
- Promote the development strategies and policies that work towards creating a healthier West Belfast.
- Assist the local community sector to lobby for resources, support and recognition for the valuable work they contribute to creating a better society in West Belfast.

Vision

We agree that the immediate challenges lie in supporting economic recovery and tackling disadvantage however there is no indication of an overall agreed vision. We support cross departmental working and the commitment to work across sectors, including the voluntary and community sectors to help deliver on the targets.

The stated aim of the Programme, to achieve a shared and better future for all, laudable and we look forward to working in partnership with the Executive to achieve this. It is also significant that the Programme adopts equality and sustainability as underlying principles of work and commits itself to the values of equality and fairness and the ethics of inclusion and good relations. These principles, values and ethics establish constructive frameworks for delivery with positive outcomes for all. The commitment that no section of the community will be left behind and the emphasis on tackling inequalities is very positive.

Committing the Programme to measurable poverty outcomes would help embed this in the work of government and make a large contribution to the achievement of the Programme's stated goal.

In particular, we welcome the draft Programme commitments to:

- deliver a range of measures to tackle poverty and social exclusion
- finalise the Cohesion, Sharing and Integration Strategy to build a united community and improve community relations;
- actively seek local agreement to reduce the number of 'peace walls';
- establish a Ministerial advisory group to explore and bring forward recommendations to the Minister of Education to advance shared education
- Include social clauses in public procurement contracts for supplies, services and construction (DFP)

We agree that the priorities are inter-related submit the following points for consideration:

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

The Partnership would like to raise concern over the fact that there is still silo working and that there is a lack of emphasis on cross departmental working. The

Partnership would like more emphasis put on cross-departmental working in order to prevent wasted funds.

We are pleased to see the inclusion of social clauses in the draft PfG but believe this must be practical, innovative and robust. We would like to see clear measures as to how social clauses are monitored so that communities receive the maximum impact.

In terms of FDI the Partnership asks, have targets been set to export more widely to strong and emerging economies, e.g. BRIC countries? What other opportunities can be identified or partnerships developed to maximise these links?

The Partnership would like to highlight further measures that should be considered to 'further strengthen the economic goals' of the Executive should they secure the power to vary corporation tax. The Partnership feel that better cross boarder links and an all Ireland approach would help strengthen economic goals as ROI are operating at a successful 12.5% rate of corporation tax and attracting global companies as a result. Securing the power to vary corporation tax would help assist economic goals however the Partnership recommends that a reduction in employers NIC should also be considered if they are to help generate new jobs as this is the greatest barrier that employers face when employing new staff. It is also unclear as to whether or not a reduction in Corporation Tax has been drafted into the PfG. The Partnership urges that this decision be made promptly so that clear parameters can be set in order to successfully attract FDI and so that companies can plan for future growth.

The Partnership welcomes the commitment to, 'support the promotion of over 25,000 new jobs,' however, although job creation is a welcoming commitment, the Executive would need to introduce measures to ensure current businesses receive the support they need to retain their employees as introducing new jobs within a sector can threaten existing jobs within that sector also. SMEs are vital in sustaining the economy in West Belfast therefore it is of the utmost importance that they receive the necessary support to sustain their employees.

The Partnership appreciates the commitment to 'achieve £300m investment through FDI' to support businesses in innovation R&D and Creativity, however this commitment is insufficient in detail it does not address the matter as to how businesses will be targeted and supported. The PfG fails to state whether the £300m investment will be evenly distributed or if there will be consideration given to the areas of deprivation that exists. The Partnership feels that this issue needs to be addressed in order for social justice to be restored in West Belfast. The West Belfast Partnership Board is recognised as being a leader in grass roots creative industry development in Belfast therefore, it is our responsibility to ensure that our creative industry section is supported and given every opportunity possible. It is on this point the Partnership notes that the PfG does not include a structure as to how '200 projects through the Creative Industries' can ascertain such support. We welcome the £4million investment in the Creative Industries Innovation Fund but in our experience those working below the radar, in bedrooms and garages often do not

access such funds. Ongoing support at the grassroots for the creative industries is vital and is where the WBP will have a key role to play. Over the past couple of years we have worked with local creative's across Belfast and in 2011 held four successful seminars that focused on key issues facing the creative sectors.

We have identified a need for greater linkages for creative's across the city; accessing opportunities that exist; showcasing talents; fostering collaboration across industries and geographical areas.

The West Belfast Partnership is a key enabler locally as well as city wide through the Belfast Area Partnerships and through our coordination role, experience and existing relationships with creative are locally and citywide we have access to a wealth of creative talents through continuous engagement. Based on experience and analysis there are a number of specific initiatives the West Belfast Partnership believes would help develop the potential of the creative industries in Northern Ireland.

There are a number of key elements and gaps that no one else is addressing and we can provide that would help drive the creative economy.

- Connecting creative's into citywide and regional opportunities
- Advocating and lobbying for community and voluntary sector involvement in creative industries development
- Increase employment opportunities in the sector through skills development; academic and vocational progression routes; and sector-led continual professional development programmes
- Assist the creation and growth of the creative industries through business support and progression
- Encourage creative individuals and businesses to locate in the area
- Links with tourism

Outstanding is the need for strategic coordination across the city, especially at local level, and an ongoing central contact for creative's together with programme development to encourage more to consider formalising their hobby into a full time business and for those who are interested in growing an existing creative venture.

With regards to the commitment to 'increase the value of manufacturing exports by 15%,' The WBPB believes that a way in which to aid progress would be large manufacturers sharing their best practice with SME so that some of target of '15% exports' can come from SME's. The WBPB is in a position to aid correspondence between SME's and large manufactures and would welcome the opportunity to meet with government and Invest NI with regards to this commitment.

SMEs and local traders are at the heart of our communities. Therefore specific actions need to be aimed at supporting small business and social enterprise as they are they are essential in ensuring sustained growth in West Belfast. It is of extreme importance that we do not lose sight of the role they play in supporting our economy. The Partnership are pleased that measures are being taken to ensure their future and welcomes the commitment to aid the liquidity of SMEs through a '£50m loan

fund,' however this will only be beneficial as long as SMEs can apply. It is on this point that the Partnership recommends more clarity on the application process.

The Partnership appreciate the commitment to 'invest in social enterprise growth to increase sustainability in the broad community sector,' and welcomes the Executive acknowledging the voluntary and community sector within the PfG as we feel that the work we do is being recognised. However, the Partnership notes that whilst the Executive's aim is to 'invest in social enterprise growth to increase sustainability in the voluntary and community sector' it fails to stipulate how much is to be invested and how it will be invested.

The WBP would like to express a note of caution in relation to the role that social enterprise can play in relation to building sustainability within the voluntary and community sectors. Social enterprise is an important sector but it is not the 'commercial saviour' for the community and voluntary sectors.

The Partnership is actively involved in the West Belfast Traders Forum and feels that additional support should be given to such forums in order to effectively carry out the commitment to, 'encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015.' If additional support was given to The West Belfast Traders Forum it would enable organisations within the forum that are already achieving results in their environmental management and improvement to be a catalyst for others to learn from.

The commitment to 'increase the proportion of young people from disadvantaged backgrounds who achieve at least 5 GCSE's at A*-C or equivalent' is a welcoming commitment for the Partnership. Having the PfG pay recognition to disadvantaged areas will have significant effects on West Belfast and will hopefully target the social inequality and deprivation that the people of West Belfast suffer.

The Partnership notes that there is no clarity as to how the PfG intends to 'increase the proportion of young people' achieving these results. The Partnership suggests that the PfG include within it measures that they purpose to take in order to ensure that disadvantaged young people have both support and access to achieving these grades. The Partnership would like to recommend that specific attention be paid to utilising the facilities that West Belfast has to offer, as using local facilities to deliver qualifications can rule out barriers that disadvantaged young people face when studying, i.e. cost of travel, etc. The Partnership would like to recommend that measures be introduced so that there can be improved links between schools and industry especially around the curriculum so as to ensure school leavers have the necessary skills and qualifications needed to join the workforce. The Partnership has long provided innovative approaches to raising educational attainment, qualifications and aspirations. So successful are the Aisling Bursaries developed by the West Belfast Partnership and the Belfast Media Group that Belfast City Council has chosen to roll out a similar scheme across the city. Additionally, the Partnership has operated Easter and Summer Schools to help address barriers to further and high

education and raise attainment locally. Practical and effective measures such as these should be supported.

The Partnership notes the commitment to 'upskill the working age population by delivering over 200,000 qualifications,' there is no clarity as to whether all institutes of further and higher education are to deliver said qualifications. The Partnership suggests that the PfG include within it a distributed number of qualifications to take place in colleges/institutes across the North with specific attention paid to utilising the facilities that West Belfast has to offer. The Partnership recognises that 200,000 are to be delivered, however the PfG fails to stipulate if there are any barriers surrounding entering into said qualifications.

The Partnership welcomes the commitment to 'allocate an increasing percentage of the overall health budget to public health,' but notes that the PfG does not stipulate how the budget would be spent and would recommend clarity surrounding this point. The Partnership feels that it would be of extreme benefit to combine the public health agenda to community based social enterprises based on models created by community enterprises such as Colin Neighbourhood etc. We feel that this commitment has the capability of putting care back into the community in a way that is owned by the community and in turn giving back into West Belfast a sense of ownership.

With regards to the PfG's commitment to 'progress the upgrade of key road projects' The Partnership would like to highlight the Belfast Rapid Transit 'Westway', which is a key infrastructure development that will ensure that citizens are able to access major employment locations and will help reduce the sectarian fracture of Belfast. The Partnership would also like to see digital infrastructure on the scale of Project Kelvin expanded across the city and extended into key creative hubs such as the Conway Mill.

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

While supporting the goal, principles and ethics of the Programme for Government, the WBP welcomes the emphasis on creating opportunities, tackling deprivation and improving health and well being. We have some concern that the key commitments are too high levels and offers no recognition of the important role of the Community and voluntary sectors in achieving the milestones/outputs.

For example, there are eight proposed Investment Zones in the Social Investment Fund (SIF), one of which is West Belfast and Greater Shankill Taskforce Area. Local communities have a central role in the development of the Strategic Action Plans for the SIF and the WBP would like to see the finalisation of this document and a mechanism to deliver the funding as a priority. We are still waiting for the final version of the SIF and feel that the milestone/outputs for 2012/2014 are unrealistic, especially in terms of meeting key milestones for physical regeneration. The WBP welcomes the commitment to delivery 8,000 social and affordable homes and stress the need that the housing is built in areas where the waiting list for social housing is most acute.

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

There is duplication with the reference to health and well being within both Priority 2 and 3. In order to ensure a streamlined and strategic focus on health and well being we feel that it would be best placed within a single priority, yet ensure cross departmental cooperation to achieve the milestones.

There are a number of key commitments under Priority 3 that the Partnership believes it is important to comment on for West Belfast. These are detailed below.

Key Commitment

Protect and enhance our natural environment by working to halt the loss of biodiversity.

West Belfast has a vast stock of green resources (e.g. Bog Meadows, Falls Park and the Belfast Hills), which help define the natural setting of the area and contribute significantly to making it a better place to live, work and visit. Consequently, the Partnership believes placing measures to reduce the loss of biodiversity on the PfG is very positive, as it will raise awareness and strengthen efforts to avoid diminishing and damaging these green assets that are so important for West Belfast

Key Commitment

Improve Community Safety by tackling anti-social behaviour Reduce the Level of Serious Crime

The Partnership welcomes this commitment, especially for West Belfast, as the area is prone to anti-social behaviour and crime, with the incidences of these greater in West Belfast than many other areas of Northern Ireland. However, the PfG makes reference only to reductions in anti-social behaviour and crime through the DOJ and policing. However, extensive research has shown that employing Secure By Design principles in new developments can significantly reduce the incidences of anti-social behaviour and crime. The Partnership believes that for crime and anti-social behaviour to be significantly reduced it is important to recognise the importance of Secure By Design and the role of the DOE and Planning Service could have in ensuring this happens.

PfG should recognise that the anti-social behaviour and crime issue can be more thoroughly combated through a number of organisations, not just DOJ, but the DOE (through the Planning Service). There needs to be greater awareness of the benefits of cross departmental working.

Key Commitment

Invest over £500 million to promote more sustainable modes of travel.

West Belfast currently experiences severe traffic congestion at peak times throughout the day. Also, due to limited parking availability many cars are forced to park along core arterial routes, taking up traffic lanes and further exacerbating traffic congestion. Consequently, the Partnership recognises the importance of this £500 million investment which can potentially reduce reliance on the car and increase

uptake of more sustainable transport options, such as walking, cycling and bus. The Partnership recognises the potential of the WWAY rapid transit scheme in achieving this goal for West. In the draft PfG, there is no breakdown of how this investment will be spent. However, the Partnership recommends that a significant portion of this budget goes into trying to change the car reliance mindset, helping us to move from a car culture to a culture which relies on more sustainable transport, such as bus. Failure to change this car culture and mindset will undermine any improvements in public transport and rapid transit schemes, as car users will not buy in, reducing the potential positive outcomes of schemes such as WWAY.

Key Commitment

Actively seek local agreement to reduce the number of 'peace walls' (involving a reduction in the number of interface structures in 2013/2014)

The Partnership recognises that this as a positive step, potentially helping to build a strong and shared community. However, before reducing the number of peace walls, it is important to undertake comprehensive engagement with each individual community living in areas in close proximity to these structures to establish if there is a desire for peace walls and interface structures to be reduced. Interface structures should only be reduced/removed if the communities feel that they are 'ready', irregardless of the 2013/2014 goal to reduce these structures.

Priority 4: Building a Strong and Shared Community

We believe that commitments to tackling the social and economic causes of division are vital if we are to reduce the number and scale of physical barriers. To this end we also welcome commitments to shared education, improved educational attainment, investment, job creation, regeneration of key sites, tackling poverty and social exclusion, improvements to community safety, improving health and wellbeing and access to justice.

There are a number of key commitments under Priority 4 that the Partnership believes it is important to comment on for West Belfast. These are detailed below.

Key Commitment

Deliver at least 30 Schemes to improve landscapes in public areas to promote private sector investment in towns and cities across Northern Ireland.

The Partnership recognises that improving the physical appearance of areas can increase investment, which is especially important in the current economic situation where investment is low and vacancy rates are significant (11% in the Falls Road area). However, the Partnership is concerned that at a Northern Ireland level, 30 schemes is not significant, and many areas in need (including those throughout West Belfast) could be overlooked.

Key Commitment

Include Social Clauses in public procurement contract for suppliers, services and construction.

The Partnership recognises the value of Social Clauses, particularly in West Belfast, where unemployment is significantly higher than many areas in NI. Social Clauses in construction contracts in West Belfast would enable locals and unemployed people to gain employment during projects. However, the Partnership is keen to stress that Social Clauses must extend beyond providing employment of the unemployed people during construction, and should include other areas that can generate more long lasting effects for the community. For example, as in other areas of the UK Social Clauses are used to ensure significant community involvement in the design process of development projects, where within the contract there is an agreement to involve wider stake holders and involve them in project design, rather than tokenistic consultation. This is especially important for West Belfast and its major projects (such as Casement and a proposed large scale mixed use redevelopment at Andrews Mill) and any future large scale projects, to ensure greater community support, and buy in. This will create more sustainable communities, as they have been shaped by communities themselves.

Priority 5: Delivering High Quality and Efficient Public Services

Local Government Reform

The draft PfG milestone for introducing Local Government reorganisation legislation is very welcome and removes uncertainty from this important area of reform. Two of the most important new responsibilities of local government will be (Land use) Planning and Community Planning. The PfG should include milestones for each of these policy areas (see below). The changes to local government structures and responsibilities will have major implications for local communities and their engagement with councils and other public bodies. A capacity building programme to enable communities to understand and prepare for the changes should be delivered across the region. We [recommend](#) that this programme be included as milestones for 2013-2014 and 2014-2015.

Planning Reform

There are a number of provisions in the Planning Act 2011 which can be implemented prior to the establishment of new local government arrangements. The Department is preparing a Planning Reform Bill and we [recommend](#) that this be included as a milestone for 2012-2013.

The Planning Act 2011 reiterates a Government commitment to a Department of Environment Statement of Community Involvement (SCI). This only requires a commencement order for implementation. We [recommend](#) that a Commencement Order for a DoE Statement of Community Involvement be a milestone for 2012-2013.

The Act also makes provision for pre-application consultation on major planning proposals. The Department of Environment will be working with two major developments which are receiving public funding to pilot pre-application consultation. The pilots will inform the preparation of guidance under the Act. Provision needs to be made for supporting communities to engage with the Department in the development of this guidance and also its Statement of Community Involvement. We [recommend](#) that a community involvement programme be provided in 2013-2014 and 2014-2015 to ensure meaningful community input to the preparation of both pre-application consultation planning guidance and a DoE Statement of Community Involvement.

Due to legal and other challenges large parts of the region do not have an Area Development Plan. These challenges have now been exhausted leaving the way clear for the creation of a 'plan-led' framework for the effective functioning of the planning system (as envisaged by the Planning Act 2011). This framework would facilitate economic growth and sustainable development while providing greater clarity for investors, developers and communities. We thus [recommend](#) that milestones be established for each of the next three years to ensure full regional coverage of Area Development Plans by 2015 when the new local council model is established.

Community Planning and the Power of Well-being

The new councils will be required to facilitate Community Planning in their areas by engaging communities and working in partnership with public sector agencies. This new power is central to the local government reorganisation policy but is not referred to in the draft PfG. This new responsibility is designed to deliver improved and more effective public services while also promoting community development and renewal. Statutory guidance on Community Planning will need to be in place prior to the new councils being formed. It should draw on the lessons being learned from pilot Community Planning projects supported by the Big Lottery Fund.

To ensure this is achieved we [recommend](#) the following milestones:

2012-2013: pre-consultation on draft Community Planning statutory guidance (informed by good practice here and elsewhere);

2013-2014: consultation with shadow councils and community stakeholders;

2014-2015: introduction of statutory guidance alongside establishment of new councils in 2015.

To enable the shadow councils and community stakeholders to prepare for these new responsibilities capacity building should be provided. A capacity building programme for community stakeholders on local government reform and community planning should be milestones for 2013-2014 and 2014-2015.

Third Party Appeals

At the Committee stage of the Planning Bill the Environment Committee supported the introduction of a limited right of third party appeal. In response the Department informed the Committee that the issue would be revisited in the near future. Subsequently a motion supporting the introduction of a limited right of appeal for persons other than the applicant received significant support in the Assembly. The consultation on the draft Planning Bill also engendered considerable levels of support (60% of respondents). We thus [recommend](#) that a milestone for 2012-2013 be the initiation of a public debate on the merits of introducing a third party right of appeal.

Plans for Interface Areas

The draft PfG includes a very welcome commitment to seeking local agreement to reduce the number of 'peace walls'. The associated milestones (for the Department of Justice) include developing action plans for prioritised individual areas. Community Places has recently completed action plans for four interface areas of Belfast. These were made possible through the support of Belfast City Council and the engagement of residents, community organisations and public agencies. The plans were endorsed by communities in each of the four areas, identified a series of

actions for implementation and were presented to the Council's Good Relations Partnership.

The process used by us to secure community engagement and support for the four interface action plans provides a model which should be drawn on. It is also important that the skills mix (community development and engagement along with land use planning) brought to the process is utilised for the proposed action plans. We thus [recommend](#) that an additional milestone for 2012-2013 be: draw on recent models of interface action planning in Belfast to build locally agreed action plans for interfaces areas.

Delivery

The WBP believes that the proposed Delivery Framework provides an efficient and effective delivery structure, with clear lines of responsibility, however, the monitoring arrangements are less robust and we would like to see more public accountability for the implementation of the Programme. We would like to stress, however, that effective partnership working within the Executive is crucial to the success of the Programme for Government.

The WBP welcomes the Draft Programme and the approach, priorities and commitments it advocates and offers its support to achieve its goal. The West Belfast Partnership would also welcome the opportunity to work with government departments in the formulation of their departmental plans of work, where appropriate.

Wheeler N

Dear First Minister/deputy First Minister

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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.
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- 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

N Wheeler

White J

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Office of the First Minister and deputy First Minister Room E3.19 Block E,
Castle Buildings Stormont Estate Belfast
BT4 3SR

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Yours sincerely, RJ White

Wild R

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Yours sincerely Rosemary Wild

Williamson L

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L Williamson

Wilson P

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Yours sincerely

Mrs Pauline Wilson



Programme for Government

Consultation Response

**Issued by the Northern Ireland
Executive**

February 2012

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Introduction

The Women's Resource and Development Agency (WRDA) is a regional organisation whose mission is to 'to advance women's equality and participation in society by working to transform political, economic, social, and cultural conditions'. The organisation was established in 1983 and works with women's groups from all traditions in the most severely disadvantaged communities, and from urban and rural areas of Northern Ireland. We work from the grass roots to the highest levels of policymaking and politics, providing advocacy and lobbying support. WRDA is a membership organisation with over 400 members comprised of Women's Groups, Organisations, and individual members.

General Comments

WRDA welcomes the opportunity to respond to the consultation on the Programme for Government. WRDA agrees with the guiding principles within the Programme for Government. We are pleased to note that the Programme for Government has recognised the connection between poverty, deprivation and disadvantage to social progress, economic recovery, and having a peaceful, fair and prosperous society. We welcome the idea of greater collaborative working within the Government and between the Government and the voluntary and community sector.

WRDA has some concerns in relation to the Programme for Government. The Programme for Government was issued a considerable amount of time after the budget which makes it difficult to determine the feasibility of this. The draft Programme for Government states 'the EQIA has also been issued for public consultation' but this was not issued until 10th January 2012. This raises concerns that equality impact is not regarded as an important issue. The programme for Government is high level with little detail available to demonstrate how the key commitments will transfer into actions making it difficult to comment on programme delivery. Some of the milestones/outputs are very limited or non-specific making comment difficult. There is a need for action plans and details of programme delivery to ensure that the priorities are fit for purpose and to ensure that outputs are being met. As there is only a lead department mentioned for each commitment, there should be structures in hand to ensure cross-departmental working. Overall, it is a document that offers commitments without giving any detail on how the Executive plans to meet the targets mentioned.

Main Issues within Key Priorities

Growing a Sustainable Economy and Investing in the Future

1. *Pressing for the devolution of corporation tax* – WRDA are extremely concerned that the devolution of corporation tax will adversely impact upon the population as a whole but more specifically on women. There is little evidence to show that reducing corporation tax will bring an equivalent boost to the Northern Ireland economy, but it is evident that a reduction in the Block Grant of approximately £400 million at a time of austerity will result in

the Executive needing to make further spending cuts. Women are already disproportionately affected due to Westminster cuts to Welfare and public spending and any further reductions are likely to increase the pressure on women economically and as many women are the main carers within families, cuts to public services will exacerbate the stress of caring. WRDA calls upon the Executive to consider the implications of a further reduction to the Block Grant and to make sure that any changes to expenditure will not disproportionately impact on women.

2. *Support the promotion of over 25,000 new jobs* – WRDA have noted that in the seasonally adjusted claimant count (January 2012) the number of women claimants over the last year has increased by 2600 whereas the number of men has only risen by 100¹. In the UK, female unemployment is at a 23 year high at 7.5% mainly due to job losses in the public sector and a shortage of job creation in the private sector. WRDA are worried that as the impact of departmental cutbacks take place in Northern Ireland there will be a similar or larger increase here. In Northern Ireland 42% of employed women are in public sector jobs. The report commissioned by WRDA “The Northern Ireland Economy: Women on the Edge?” demonstrates how women’s access to the labour market leads to economic empowerment and works to combat poverty. We urge the Executive to promote jobs for women including bringing about flexible working, equal pay and better childcare.
3. *Childcare Strategy* – WRDA are very concerned that there is no mention of the Childcare Strategy under this priority. It is widely acknowledged that lack of childcare provision is the single most cited barrier to parents seeking employment. Northern Ireland is the only part of the United Kingdom that does not have legislation to ensure the availability of childcare. Thirty-two per cent of working age inactive women were unavailable for work due to family/home commitments². WRDA urges the Executive to advance the Childcare Strategy for Northern Ireland and to recognise the important role that childcare plays in developing economic growth, enhancing equal opportunity and a better standard of living for all. It is vital to provide affordable, available and accessible childcare to increase women’s economic activity.
4. *Growing the Private Sector/Reducing Public Sector* – WRDA are concerned that, given the emphasis on growing the private sector, women will be disproportionately affected due to private sector reluctance in implementing flexible working arrangements. Women (more than men) often need to fit their working hours around the available childcare. Women due to caring

¹ Seasonally adjusted claimant count (January 2012) http://www.detini.gov.uk/table_3.1_jan_2012.xls

² Women in Northern Ireland (September 2011) Department of Finance and Personnel

commitments may need to take a career break affecting both their income and their pension prospects. Women working in the private sector in Northern Ireland earn considerably less than those in the public sector. These factors impact on women's income both now and in later life. We would urge the Executive to monitor the level of earnings within the private sector and to promote greater flexibility in workplaces. WRDA are worried that the cuts in public spending will lead to a considerable number of public sector workers becoming unemployed. The public sector workforce consists of almost double the number of women to men. Any reduction in staffing levels is likely to impact harder on women at a time when new jobs are difficult to find.

5. *Training and Skills* – WRDA notes that the Executive are planning to upskill the workforce. We are concerned that in doing so the majority of training opportunities will be centred on the male workforce. At a recent workshop held by WRDA and CFNI, concerns were voiced about the number of young women directed into training for hair and beauty as there are only so many hairdressing and beautician jobs available. WRDA would like to see women being encouraged to train in fields where there are job prospects. We urge the Executive to promote training in areas of growth to both men and women equally, and to offer women opportunities to reskill in these areas.

Creating Opportunities, Tackling Disadvantage and Improving Health and Well-Being

1. *Poverty* – WRDA are pleased that the Executive is making a commitment to reducing the level of poverty in Northern Ireland. However, we feel that reducing the level of child poverty should be given priority considering that Northern Ireland has an extremely high level of child poverty. The Households Below Average Income Survey (November 2011) produced by DSD shows that 120,000 (28%) children are living in poverty, an increase of 3% from 2009/10. Northern Ireland is the only area in the UK where this has increased from 2009/10. WRDA ask the Executive to prioritise actions that will alleviate child poverty and to demonstrate progress and outcomes on the Child Poverty Strategy.
2. *Welfare Reform* – WRDA are surprised to see that 'introducing changes to the welfare system' is regarded as a way of tackling disadvantage. Women comprise 53% of benefit recipients in Northern Ireland and given that many more women work part-time and are on lower wages, they rely more on benefits and tax credits than men do and these make up a larger share of their income³. This means that many of the changes to the welfare system will disproportionately impact upon women. Whilst WRDA acknowledge the need to incentivise work and to simplify an extremely complex benefit system,

³ WRDA Report (2011) *The Northern Ireland Economy: Women on the Edge?*, Bronagh Hinds (p117)

we are extremely concerned that changes to social protection will in fact unfairly impact upon women and erode women's economic independence and rights. The planned changes to the welfare system such as a monthly payment, all money to be paid to one person in household and the loss of incentives for a second earner will all dramatically impact on women's lives and will result in a loss of economic independence rolling back women's equality. WRDA strongly recommend that Universal Credit is paid to the carer (usually the woman) within the household to increase economic independence and to encourage expenditure on the children. It would alleviate some hardship if Universal Credit was to be paid weekly. We note the commitment to set up an advisory group to assist Ministers in alleviating hardship including any implications of the UK Government's Welfare Reform Programme but we do not feel that this is sufficient to protect people from the worst impacts of the changes ahead. We urge the Executive to look at ways in which the impacts of welfare changes on women can be alleviated such as weekly payments and to put these into practice.

Building a Strong and Shared Community

1. *Women's sector* - WRDA is disappointed that no reference has been made of the role women and women's community based organisations in promoting good relations particularly those organisations situated in areas of high levels of socio-economic disadvantage or situated within interface areas and areas experiencing the most demographic change due to inward migration in recent years, and these are the areas which have been most affected by the conflict. For example, women's community based organisations and women's centres offer childcare, education and training classes which have been accessed by women from different religious backgrounds, race and sexual orientation.⁴ WRDA urges the Executive to ensure women are fully recognised in this priority and to recognise the role of women's community based organisations in promoting good relations through their services provided to women with multiple identities such as race, political opinion, religion and sexual orientation.

Equality Impact Assessment

Whilst the EQIA recognises the socio-economic inequalities between men and women and the lack of female representation in public life, there appears to be no serious actions to mitigate these within the document. We would like to see greater integration between the Programme for Government and the EQIA. WRDA urge the Executive to take actions to minimise inequalities and to prevent the current economic situation from worsening already existing inequalities.

Conclusion

⁴ WRDA (2007) *Is Gender Part of Good Relations?: Report of a Conference on a Shared Future*, pgs 24-26

WRDA recognise that the Programme for Government is written as a dynamic document in order to respond to change, however this makes it very difficult to respond to as it is hard to foresee possible impacts of actions without some idea of delivery plans. WRDA feel that much of this Programme for Government has ignored the principles of gender analysis by failing to recognise the differential impact of its actions upon women and upon men.

WRDA ask that the Executive recognise that women are in a structurally unequal position in society and that due to this existing inequality further changes will impact disproportionately upon women. We urge the Northern Ireland Government to take this into account when deciding on the Programme for Government. WRDA are happy to discuss this further



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A Response to: Programme for Government

Issued by: OFMDFM

January 2012

Introduction

- 1.1. The Women's Support Network (WSN) welcomes the opportunity to respond to this consultation issued by OFMDFM.
- 1.2. The Women's Support Network (WSN), established in 1989, is a regional organisation that works across all areas of Northern Ireland. It includes in its membership community based women's centres, groups and organisations, with a concentration in disadvantaged areas. WSN is a charitable and feminist organisation, which adopts a community development approach. We provide a range of support and services to 63 community based women's centres, projects and infrastructure groups and 26 associate members drawn from across the community and voluntary sector who support women, families and communities. (see Appendix 1).
- 1.2. Our members provide a wide range of women-centred front line services across Northern Ireland, including:
 - Specialist Advice
 - Childcare and Family Support
 - Counselling, Support and Advocacy
 - Complementary Therapies
 - Training & Education
 - Health & Wellbeing Programmes
 - Personal Development & Employment Support
 - Volunteering, Leadership & Empowerment
- 1.3. WSN aims to achieve social, political and economic justice through the promotion of the autonomous organisation of women. The Network aims to strengthen the collective voice of women's groups and to promote and develop networking opportunities, to enable collective action and to impact upon policy and decision making processes. WSN provides an accessible, feminist, relevant and high quality support service and resource for its member groups. The Network is also an important information resource on issues relevant to community based women's organisations and for other infrastructure groups, nationally and internationally.

- 1.4. Over the past 30+ years, the community based women's sector has developed a range of front-line services such as childcare, support, advice, and education & training services in response to the needs they identified at a grass roots level. Women's groups continue to meet the particular needs of women and their children living in areas considered to be some of most affected by the conflict, and recognised as some of the most disadvantaged areas across Northern Ireland today.

- 1.5. Network members are actively engaged with their local communities, cross-community initiatives and regional structures throughout Northern Ireland.

2.0 General Comments

- 2.1 As an Network organisation representing 85 community based women's centres, projects and infrastructure groups drawn from across the community and voluntary sector who support women, families and communities, WSN welcomes the opportunity to respond to the Programme for Government issued by OFMDFM.
- 2.2 We wish to raise the issue of time and sequencing of the Budget, Programme for Government and the EQIA. We have serious concerns this Programme for Government was presented sometime after the budget; not to mention the EQIA which did not appear for weeks after. The Women's Support Network would like to see the Northern Ireland Executive take this process seriously and make the necessary changes so that future decisions and processes are developed in a logical and coherent manner.
- 2.3 WSN very much welcomes the emphasis on 'Creating Opportunities, Tackling Disadvantage and Improving Health & Wellbeing.' We believe this priority will help in reducing inequalities, especially for women and their families in relation to poverty, income, work opportunities and education.
- 2.4 Although we agree in principle with all the priorities contained within the consultation, there is an urgent need for a robust action plan and delivery programmes to ensure the priorities are fit for purpose and that Departments are indeed meeting outputs.
- 2.5 WSN is disappointed that a gender perspective has not been mainstreamed in the Programme for Government or preceding budget. OFMDFM has highlighted in the Gender Equality Strategy that "the gender perspective will be taken into account during the whole process of policy development in all the Government functions."¹ The Council

¹ OFMDFMNI *Gender Equality Strategy: A Strategic framework to promote gender equality for women and men 2006-2016*, Pg 35.

of Europe has published a handbook on Gender Budgeting and defines gender budgeting as “an application of gender mainstreaming in the budgetary process.”² According to the Council of Europe, gender budgeting involves three stages including analysis involving gender disaggregated data, determining the differential impact of the budget between men and women; reformulation of policies and redistribution of resources to ensure gender equality outcomes; and embedding gender equality within all budgetary processes.

WSN believes the approach highlighted in the Council of Europe's handbook is vital to ensure that equality of opportunity on the grounds of gender is embedded in the budgetary process. WSN recommends that OFMDFM and other government departments in future adopt the approach published by the Council of Europe in its guidance on gender budgeting thus ensuring gender equality in budgetary processes.

- 2.6 It is our strong belief that CEDAW (Committee on the Elimination of all forms of Discrimination Against Women) should be unified across the whole of the UK, including devolved regions such as Northern Ireland. In paragraph 263 of the follow up concluding reports it states that *‘the principal responsibility for implementation of the Convention lies with the Government of the United Kingdom’*.³ Without this, the unequal position of women within Northern Ireland will continue. We are therefore requesting that the Northern Ireland Executive incorporates the principles of CEDAW into domestic legislation to promote the rights of and equality of women within Northern Ireland.

3.0 Priorities

- 3.1 **Growing a sustainable Economy and Investing in the Future –**
WSN is extremely disappointed that the *Childcare Strategy* has not been given consideration within this priority. Parents need access to

² Council of Europe (2009) *Gender Budgeting: Practical Implementation handbook*, Pg 5.

³ <http://www2.ohchr.org/english/bodies/cedaw/followup.htm>

high quality, accessible and affordable childcare services in order to be able to reconcile their caring and work/education demands⁴.

It is well documented that there is a lack of childcare provision in Northern Ireland. Furthermore, the childcare settings which do exist are unevenly distributed across the region. Rural areas have the lowest level of childcare provision. 71% of all childcare settings in Northern Ireland exist in the east of the region (within the Northern, South Eastern and Belfast Health and Social Care Trust Areas). The remaining percentage of childcare settings are found within the, mostly rural, Southern and Western Health and Social Care Trust Areas.

Without adequate and affordable childcare provision, parents struggle to access work and stay in work. The second Childcare Costs Survey (2011) carried out for the region by Employers for Childcare revealed that for 46% of respondents the cost of childcare influenced the hours they work. In addition to this many families struggled with their childcare costs. 45% of the average net salary is allocated to childcare for one child⁵.

The 2005 review of the Northern Ireland Childcare Strategy (1999) also recognised the need for a strategy, stating that the *“availability of affordable childcare has been identified as a barrier to parents hoping to return to work”*⁶. More recently the First and Deputy First Minister outlined the need to empower parents back into employment through access to childcare in the Northern Ireland Child Poverty Strategy.⁷

Childcare policy in Northern Ireland has suffered neglect. This is evident given that the themes of the first Childcare Strategy for the region, *Children First (1999)* still remain relevant. Furthermore, childcare policy and development in the region lags behind the rest of

⁴ For the purposes of this section childcare denotes the care of children that is provided through registered formal daycare services.

⁵ Employers For Childcare Charitable Group (2011) Northern Ireland Childcare Costs Survey 2011, EFCC

⁶ DHSSPS (2005) Review of Children First Final Report, August 2005, p46, DHSSPS

⁷ NIE (2010) Improving Children’s Life Chances, The Child Poverty Strategy, p1, NIE

the UK where childcare services have been elevated to a statutory footing.

The Executive therefore must recognise the importance of a childcare strategy and place it at the heart of growing a sustainable economy and investing in the future of Northern Ireland. In 2009 there were 1364 individual children registered for childcare within Women's Centres⁸. This equates to 9828 hours of childcare provided weekly mainly for children age 0-4 years funded by the Department of Social Development through the Women's Centres Childcare Fund. Therefore we also call upon the Executive to support the Department for Social Development as it continues to fund childcare within Women's Centres.

3.1.1 Apart from the labour market indicators relating to the economic inactivity of women highlighted in the EQIA, there is no mention within the Programme for Government. It is not enough to recognise these issues but policy solutions must be brought forward to tackle the problems. Women are less well connected to the labour market⁹ and are concentrated in part-time jobs with the largest pay disparity being for female part time workers.¹⁰ Women are also more likely to experience interruptions to their careers to take on caring responsibilities and this has a negative impact on their future career and earnings.¹¹

It is not enough to rely solely on the Creative Industries Innovation Fund to assist women in to employment. WSN recommends that girls and women are encouraged to pursue the STEM (Science, Technology, Engineering and Maths) subjects This is essential and must be written in to DEL's and DE's delivery plans and actions which will challenge gender stereotypes, particularly in STEM subjects and increased uptake of STEM subjects by girls.

⁸ Childcare Mapping and Research Report – Women's Centres Regional Partnership (2010)

⁹ DETI (2009) Women in Northern Ireland, DETI

¹⁰ Northern Ireland Assembly (2011) The Gender Pay Gap, OFMDFM

¹¹ Ibid.

WSN would like to see community education given more prominence within the Programme for Government. It is often Women's Centres who provide that first step back into learning for women, and it is often these personal development courses which provide a strong foundation to move on to other skills based courses. Women's Centres often remove the many barriers women face with formal education systems. Research by the Women's Centres Regional Partnership (WCRP)¹² illustrated barriers faced by women from disadvantaged backgrounds which can lead to social and financial exclusion. These include lack of access to adequate and affordable childcare, limited skills, qualifications and experience and confidence which can impede women in entering/re-entering education, training and employment. It is therefore extremely important that the necessary investment is made to allow women's centres to continue providing training courses and skills courses to women living in areas of disadvantage to allow them to access training and employment opportunities.

- 3.2 **Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing** – WSN is pleased that the Executive is committed to addressing inequality and tackling disadvantage. However, we fail to see how 'introducing changes to the welfare system'¹³ will help. The effects of Welfare Reform are yet to be realised however it is accepted that Northern Ireland will be hit hardest. In a report commissioned by the Law Centre NI, the Institute of Fiscal Studies established that after London, the tax and benefits changes planned up to 2014-2015 will have a disproportionate impact on NI. This is for two reasons: the high numbers of those in receipt of Disability Living Allowance, especially for mental health disorders, and the high number of families with children who will be adversely affected by cuts to social security.¹⁴ Anticipated job losses within the public sector will hit women hardest since significantly more women are

¹² Women's Centres Regional Partnership "Women living in disadvantaged communities: barriers to participation" (2009) available at www.wcrp.org.uk/cms/data/upimages/Barriers_to_Participation_-_FINAL.pdf

¹³ Programme for Government (2011)

¹⁴ James Browne, The Impact of tax and benefit reforms to be introduced between 2010-11 and 2014-15 in Northern Ireland, IFS Briefing Note 114, December 2010

employed in low paid public sector jobs, they will therefore bear the brunt of these public spending cuts, with subsequent devastating impact on the life chances of their children. We believe many women and their families will struggle (women comprise 53% of benefit recipients in Northern Ireland) especially in relation to reduced benefit entitlement, childcare costs and the intended poor delivery arrangements with proposed monthly payments which could mean many families finding it difficult to budget over lengthy periods. A report by the Women's Resource & Development Agency¹⁵ provides an evidence base detailing women's position in the economy, employment, childcare, pensions, welfare, debt and credit as well as housing and fuel debt.

3.2.1 Child poverty figures are stark; with figures for 2009-10 showing a 14,000 increase in the number of children in poverty. Northern Ireland has 28% of children growing up in poverty, with the figure for the whole of the UK standing at 20%. The Child Poverty Act 2010 is meant to ensure that action to end child poverty will be a priority for the current administration. The legislation highlights education, childcare, health, family support, financial assistance, employment, skills and housing as crucial elements in the battle to end child poverty. The Northern Ireland Executive and other UK jurisdictions have signed up to the eradication of child poverty by 2020. WSN is disappointed at the lack of ambition, targets and progress on the Child Poverty Strategy. We therefore ask that the Child Poverty Strategy is given greater importance within the Programme for Government and that an outcomes model is developed as a matter of urgency. The statistics outlined above are truly indefensible. It reinforces the need for urgent action to prioritise them, with a focus on early intervention, prevention, early years and family support.

3.2.2 WSN is pleased that the Executive will work on closing the gap in educational underachievement. Northern Ireland has a higher

¹⁵ WRDA Report (2011) *The Northern Ireland Economy: Women on the Edge?*, Bronagh Hinds (p117) Available at <http://www.wrda.net/Documents/The%20NI%20Economy%20-%20Women%20on%20the%20Edge%20Report.pdf>

proportion of working age population with no qualifications (20.3%) compared with the UK average of 10.5%. Within areas of disadvantage, children in receipt of free school meals only 29.7% achieved 5 GCSEs A* to C, including English and Maths, compared to 63.6% students who did not receive free school meals.¹⁶ Statistics from some of the most disadvantaged wards in west Belfast show that more than 80% of the young people are leaving school with no or low qualifications – at a time when the EU has a 2020 target of 40% entering higher education.¹⁷ WSN therefore call for the Executive to focus on early intervention, prevention, early years and family support. We believe this is the only way to ensure that children living in areas of disadvantage are given a better start in life and ensure better socio-economic outcomes.

3.2.3 WSN is pleased that one of the building blocks to priority two is the UN Convention on the Rights of the Child. However, we would like to see the Programme for Government place at its foundation the principles of the UNCRC with particular emphasis on Article 18. 2: for the purpose of guaranteeing and promoting the rights set forth in the present Convention, States Parties shall render appropriate assistance to parents and legal guardians in the performance of their child-rearing responsibilities and shall ensure the development of institutions, facilities and services for the care of children. Article 18.3: parties shall take all appropriate measures to ensure that children of working parents have the right to benefit from child-care services and facilities for which they are eligible. Article 27.1: parties recognise the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development. In order to achieve this, WSN would like to see greater co-operation and collaborative working in across all departments a link with the Ten Year Strategy for Children and Young People and the Children and Young People's Plan through the Health & Social Care Boards, which will be key drivers for meeting the needs of children.

¹⁶ DE STATISTICAL PRESS RELEASE Qualifications and Destinations of Northern Ireland School Leavers 2008/09, quoted in Save the Children briefing, Better Odds at School, 2010

¹⁷ Save the Children briefing, Better Odds at School 2010 p2

3.2.4 To ensure the health and wellbeing of women are kept at the forefront of this Programme for Government, WSN would also urge the Executive to consider the existing investments made in early years through other Departments e.g. DE (Sure Start) and DSD (Neighbourhood Renewal) to build on and maximise outcomes around the objective of reducing maternal inequalities for mothers.

3.2.5 Research suggests there is a connection between the conflict in Northern Ireland and the risk of mental health.¹⁸ The greater the extent to which someone's area or life is affected by it, the greater the likelihood that they have poorer mental health. A History of Falls Women's Centre (1982-2008) also noted that due to the political situation during the 'Troubles' women in West Belfast were under tremendous pressure, with "many women having sole responsibility for their families as men were in gaol."¹⁹ WSN would therefore urge for mental health issues affecting women to be given consideration within the Programme for Government.

3.3.1 WSN welcomes the Executive's aim to set to **build a strong and shared community**. WSN is disappointed that no reference has been made of the role women and women's community based organisations in promoting good relations particularly those organisations situated in areas of high levels of socio-economic disadvantage or situated within interface areas and areas experiencing the most demographic change due to inward migration in recent years, and these are the areas which have been most affected by the conflict. For example, women's community based organisations and women's centres offer childcare, education and training classes which have been accessed by women from different religious backgrounds, race and sexual orientation.²⁰ WSN urges the Executive to ensure women are fully recognised in this

¹⁸ O'Reilly, D. and Stevenson, M., 2003. *Mental health in Northern Ireland: have 'The Troubles' made it worse?* Journal of Epidemiology and Community Health Vol. 57, pp. 488-492

¹⁹ Herstory: The History of Falls Women's Centre 1982-2008

²⁰ WRDA (2007) *Is Gender Part of Good Relations?: Report of a Conference on a Shared Future*, pgs 24-26

priority and to recognise the role of women's community based organisations in promoting good relations through their services provided to women with multiple identities such as race, political opinion, religion and sexual orientation.

3.3.2 WSN calls for the full implantation of UN Resolution 1325 on Women, Peace and Security, which recognises the important role of women in the prevention and resolution of conflicts and in peace building.²¹ Most women's groups and organisations' grassroots work is crucial to the elimination of sectarianism. Those groups work in disadvantaged and marginalised areas, the same areas that suffer most from the blight of sectarianism. Given that the plethora of community organisations' leadership and decision-makers are mostly male, the lack of women's influence and input into strategies and models for tackling issues such as sectarianism can only set its elimination back. Our members work is vital to encouraging and enabling women to go forward in their community as leaders and sit on boards and committees that draw up community strategies for dealing with community relations issues. The necessity of women's equal representation at all levels of society is recognised internationally as a prerequisite to a fair, equal and peaceful society, the value of the women's sector's work is integral to this. WSN calls on the Executive to work with the UK government to implement this UN Resolution in Northern Ireland and to recognise the role of women in peacebuilding in good relations strategies.

4.0 Conclusion

4.1 Some of the key goals outlined in the Programme for Government document dovetail with the key priorities within the community based women's sector. WSN have been working with our members to improve pathways to employment, tackle systemic issues linked to deprivation and increase community services for women and their families. We are fully committed to reducing child poverty and tackling

²¹ http://www.un.org/events/res_1325e.pdf

rural poverty and isolation. The community based women's sector will continue to deliver practical outcomes through targeted community education initiatives, childcare provision and a range of services which seek to reach out and include marginalised and 'hard to reach' women.

4.1.1 However, the community based women's sector cannot achieve these goals in isolation. WSN is disappointed there has been no recognition of the work carried out by the community based women's sector in delivering programmes that assist women in to employment and help tackle poverty and social exclusion. The work of the community based women's sector must be recognised within the Programme for Government. Without this recognition, WSN is concerned the community based women's sector will not be able to continue this valuable work without infrastructure support. We appreciate that while funding such as ESF continues to assist the community based women's sector, the funding has many hurdles such as match funding. WSN would therefore welcome the stability of funding for education programmes that help women in disadvantaged areas. We would also like to see a decision taken on Learner Access and Engagement which would also allow more women to avail of education and training within a community based setting.

4.1.2 WSN welcomes the opportunity to respond to this consultation document. Whilst welcoming the Programme for Government, we have offered some constructive recommendations as to how it could be improved. We are happy to further discuss this response if required.

MEMBERSHIP 2012

	<u>Member Group</u>
1	All Ireland Mother's Union
2	An Munia Tober (Travellers)
3	Antrim & Ballymena Women's Aid
4	Ardmonagh Women's Group
5	Ardoyne Women's Group
6	ATLAS Women's Centre
7	Al Nisa Women's Group
8	Ballybeen Women's Centre
9	Ballymurphy Women's Group
10	Belfast & Lisburn Women's Aid
11	Belvoir Women's Improvement Group
12	Carrickfergus Women's Forum
13	Carew II
14	Causeway Women's Aid
15	Chrysalis Women's Centre
16	Clan Mor Women's Group (Sure Start)
17	Derry Well Woman
18	Derry Women's Centre
19	Falls Women's Centre
20	First Steps Women's Group
21	Footprints Women's Centre
22	Foyle Women's Aid
23	Foyle Women's Information Network
24	Granaghant District Women's Group
25	Greenway Women's Centre
26	Kilcooley Women's Centre
27	Lesbian Advocacy Services Initiative
28	Lesbian Line
29	Lenadoon Women's Group
30	Ligoneil Family Centre
31	Link Women's Group
32	Manor Women's Group
33	Markets Women's Group
34	NI Women's Aid Federation
35	NI Women's European Platform
36	Fermanagh Women's Network
37	Newry & Mourne Women
38	Newtownabbey Women's Group
39	Older Women's Network NI
40	Omagh Women's Aid
41	Rape Crisis Centre
42	Rasharkin Women's Group
43	Shankill Women's Centre
44	Strabane & Lifford Women's Centre
45	Strathfoyle Women's Centre
46	The Learning Lodge

47	Voices Women's Group
48	Waterside Women's Centre
49	Windsor Women's Centre
50	Women Connect Project
51	Women into Politics
52	Women's Information Group
53	Women's News
54	Women's TEC
55	Women 2 Gather
56	Women's Resource & Development Agency
57	WISPA (Women in Sport & Physical Activity)
58	Ardcarn Women's Group
59	OIYIN Women's Group
60	Mossley Women's Institute
61	Mount Vernon Women's Group
62	Coole New Opportunities
63	North Belfast Womens Initiative & Support Project
	<u>Associate Members</u>
1.	Ballymena Community Forum
2.	CiNI
3.	Community Relations Forum
4.	East Belfast Community Partnership
5.	Employers for Childcare
6.	HIV Centre (Women's Support Group)
7.	Mencap
8.	National Women's Council of Ireland
9.	Playboard
10.	RNIB (Women's Group)
11.	Good Morning Newtownabbey
12.	Monkstown Community Association
13.	WAVE Trauma Centre
14.	WEA
15.	Parents Advice Centre
16.	Templemore Community Action Group
17.	Gingerbread
18.	Larne Community Development Project
19.	Community First Coaching
20.	Changing Faces
21.	Sands NI
22.	Women's Project Ashton Centre
23.	Women on Track
24.	Matt Talbot Women's Group
25.	Ulster People's College
26.	Council for the Homeless NI

Woods J D

Dear sir or madam,

I welcome the inclusion of a cycling target in the Draft Programme for Government. Specifically- "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.

I would ask that the Northern Ireland Executive allocates sufficient investment to enable this target to be reached.

Best wishes

J D Woods



WWF *for a living planet*

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Reference: WWF Northern Ireland response to draft Programme for Government 2011-15

22 February 2012

Dear Sir/Madam,

WWF Northern Ireland welcomes the opportunity to comment on the draft Programme for Government (PfG) 2011-15. Probably the single greatest weakness of this draft PfG is the ambiguous, non-committal wording used throughout, which greatly weakens the document and often renders the targets within completely ineffectual. There is however one target which is not vague and which is of real concern to WWF Northern Ireland and that is in relation to planning, as outlined on pages 7 and 31. WWF Northern Ireland regards the changes the draft PfG 2011-15 proposes to make to the planning system as fundamentally flawed and incompatible with existing government duties and policy, in the same way that the proposals in draft PPS 24 were, and recommends these proposals be withdrawn.

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

- **Target: Support the promotion of over 25,000 new jobs (DETI).**

WWF Northern Ireland is supportive of the Executive's apparent desire to have over 25,000 new jobs in Northern Ireland. However, the issue with this target is the ambiguous wording. The target is not to create 25,000 new jobs, but to "*support the promotion of over 25,000 new jobs*" though it is unclear exactly what the Executive believes is involved in supporting the promotion of over 25,000 new jobs and what the Executive and individual departments will do as a result. It is also unclear how many jobs this "*promotion*" will actually create and what the nature of those jobs will be i.e. will they be short term, low paid jobs or long term, highly paid jobs? This is a clear illustration of the weakness of the ambiguous, non-committal wording used throughout the PfG.

WWF Northern Ireland believes that energy has the potential to be the most important influence on Northern Ireland's economic development in the medium to long term. The potential economic opportunities offered by moving to a low carbon economy have been clearly identified by many studies and in addition to the environmental, social and moral reasons, there are sound economic reasons why Northern Ireland must move to a low carbon economy. Probably the outstanding issue for Northern Ireland is that it remains overly reliant on imported fossil fuels, which provide approximately 99% of its primary energy needs⁽¹⁾, and which cost approximately £2.3 billion a year - a clearly unsustainable situation.

The International Energy Agency has made it clear that current energy consumption trends and rates are unsustainable, as illustrated by the following statement in the 2008 World Energy Outlook (p37):



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Chief Executive: David Nussbaum

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“The world’s energy system is at a crossroads. Current global trends in energy supply and consumption are patently unsustainable – environmentally, economically and socially. But that can – and must – be altered; there’s still time to change the road were on”

According to the UNEP Green Economy Report (GER)⁽²⁾ investing just 2% of GDP in a green transformation of (ten) key sectors can kick start a transition towards a low carbon, resource-efficient economy and

“Greening the economy not only generates growth and in particular gains in natural capital, but it also produces a higher growth in GDP and GDP per capita. Under the GER modelling exercise, a green investment scenario achieves higher economic growth rates than a business as usual scenario within 5-10 years”

It seems clear, therefore, that there is a pressing need to find alternatives to this unsustainable system and in particular, to oil. According to the 2008 BP Statistical Review of World Energy⁽³⁾ there was only 41.6 years supply of oil left, at the 2007 rate of consumption. However, apart from the two years of decline in 2008 and 2009, mainly due to the global recession, global energy demand has a clear upward trend, with global energy demand growing 5.6% in 2010, the largest increase in percentage terms since 1973, with oil consumption growing by 3.1% in 2010, to reach a record level of 87.4 million barrels a day⁽⁴⁾. Despite this increasing demand, estimates for global oil reserves have risen to 46.2 years, though this also includes the estimated reserves of unconventional oil sources, in particular the Canadian oil sands which are much more polluting and much more energy intensive than conventional oil. Though there is significant uncertainty attached to what are after all only *estimates*⁽⁵⁾ of remaining oil reserves, this small increase in estimated global reserves does not disguise the problems surrounding global oil supply and in particular, the issue of peak oil, which may already be upon us. For example, a report by Uppsala University⁽⁶⁾ concluded global oil production has already peaked and that

“It is unlikely that future world crude oil production will ever return to the levels seen in 2008”

The net effect of the (im)balance between supply and demand for oil is that oil price and consequently the price of energy based on or derived from oil, is likely to rise in the future. This was acknowledged by DETI in the consultation on the draft SEF 2009, which said in paragraph 2.1, on page 8,

“Energy will become increasingly expensive as fossil fuel resources decline”

and by the Minister for Enterprise Trade and Investment who said in November 2009⁽⁷⁾

“The cost of inaction on renewables now would lock us into potentially even higher costs over the long term. The era of low energy prices is over.”

In this context the lack of a reference to the need to develop a low carbon economy is disappointing and indicative of the fact that the low carbon economy does not, in WWF Northern Ireland’s opinion, have a high enough priority, despite the confirmation by the DETI Minister in the consultation on the 2010 SEF that the overall objective, outlined on page 4, was for a

“sustainable, low carbon energy future.”

WWF Northern Ireland agrees that Northern Ireland must aim to have *“a sustainable, low carbon energy future”*, but achieving this will require an energy policy predicated more fully on the three principles previously advocated by Invest NI⁽⁸⁾ of

- Decreasing energy demand
- Diversity of energy sources, moving away from fossil fuels to more sustainable sources and
- Decentralisation of production and supply

The importance of reducing demand was clearly highlighted by DETI who said that⁽⁹⁾

“Reducing overall energy demand offers the potential for the most social, environmental and economic gains”

and that

“The Northern Ireland Authority for Utility Regulation (NIAUR) also recommends energy efficiency as the best opportunity to reduce emissions and energy bills in the near to medium term”

Reducing absolute demand and increasing energy efficiency (using the energy consumed more efficiently) will be fundamental to the sustainable low carbon energy future that DETI appear to want for Northern Ireland. Reducing energy demand will also save money. For example, it has been estimated that 27 EU countries could save \$100 billion a year by 2020 through energy efficiency measures⁽¹⁰⁾. In light of the many benefits of reducing energy demand, WWF Northern Ireland believes that the Executive should also set a target for the reduction of energy across Northern Ireland, and the public sector in particular, something that should fit perfectly with the ‘invest to save’ policy of the Executive. For reference, the Republic of Ireland’s National Energy Efficiency Action Plan 2009-2020⁽¹¹⁾ has an energy savings target of 20% by 2020 for the whole economy and recognising that Government must take the lead, a higher target of a 33% for the public sector. WWF Northern Ireland believes the Executive should set targets for energy reduction in Northern Ireland of this magnitude. The EU Renewable Energy Directive of 2008 has three targets – to reduce primary energy use compared with projected levels by 20%, to reduce EU GHG emissions by at least 20% below 1990 levels and to have 20% of EU energy consumption to come from renewable resources, all by 2020 (the 20/20/20 targets). The EU Energy Efficiency Directive is being developed in order to make this energy reduction target a firm target, so it seems likely that a reduction in energy demand of this magnitude will be required in the near future in any case. That being the case, the sooner Northern Ireland reduces its energy demand by this magnitude, the better.

Northern Ireland could also learn from the experience of others countries that have realised the benefits of moving down a low carbon path. In Germany for example, in 2009 more than 10% of all energy and more than 16% of electricity was generated from renewables⁽¹²⁾ and in 2007, renewable energy sources in Germany generated more electricity than the entire UK nuclear fleet⁽¹³⁾. Despite the recent economic crisis, the contribution from renewables increased, and as a result of rising investment, which reached a total of €17.7 billion, employment in the sector grew. As of 2009, more than 300,000 people were employed in the renewable energy sector in Germany (as compared to 12,000 in the UK in 2008)⁽¹⁴⁾. The German government already has a target to cut CO₂ emissions by 40% against 1990 levels by 2020, which it estimates will generate savings of €5bn in private households and industry by 2020, and that on average, every tonne of CO₂ saved has a saving effect of €26⁽¹⁵⁾. When Germany adopted the second package implementing the integrated energy and climate programme, Federal Environment Minister Sigmar Gabriel⁽¹⁶⁾ said it

“protects the climate, lowers energy costs for our citizens and will create more than 500,000 additional jobs by 2020”.

A 2010 report on offshore renewable energy⁽¹⁷⁾, estimated the job creation potential for the UK as ranging from 70,000 (lowest scenario where offshore renewables meet 50% of UK electricity demand) to around 430,000 jobs (highest scenario where offshore renewables meet 50% of UK electricity demand and export an amount of electricity equivalent to 25% of the EU’s electricity demand).

Though wind power will most likely continue to be the dominant renewable energy source in Northern Ireland, tackling climate change needs a multi faceted approach and other options such as bioenergy and marine renewables have a role to play. According to the Carbon Trust, the UK could generate up to £70 billion for the economy and almost 250,000 jobs in offshore wind and wave power⁽¹⁸⁾. A 2009 report by IWEA and Deloitte⁽¹⁹⁾ found, in order to provide the 7,800 MW of wind power needed on the island to meet the current renewable energy targets, the Irish wind energy sector will involve approximately €14.75 billion of investment, of which €5.1 billion will be retained in the Irish economy by 2020 (€4.3 billion in ROI and €786 million in NI).

At a UK level, the Carbon Trust⁽²⁰⁾, found that, if Northern Ireland were to match the UK target set as part of the EU Renewable Energy package of 2008, to have 15% of the UK’s energy from renewables by 2020, there is the potential to create more than half a million jobs (564,000) in renewables in the UK with between 8,470 and 33,124 jobs, in a sector that could be worth almost £1 billion (£989M) in Northern Ireland alone. Accounting for the many significant economic benefits from developing a more sustainable

energy system, WWF Northern Ireland finds the overall lack of vision and lack of commitment to developing a low carbon economy in the 2011-15 PfG very disappointing. Scotland has made clear its intention to grasp the economic opportunities offered by developing a low carbon economy and has produced a Low Carbon Economic Strategy for Scotland⁽²¹⁾. WWF Northern Ireland believes that the Northern Ireland Executive should follow the Scottish example and develop a plan for a low carbon economy for Northern Ireland.

- **Target: Ensure 90% of large scale investment planning decisions are made within 6 months and applications with job creation potential are given additional weight (DOE)**

While WWF Northern Ireland recognises that there have been occasional difficulties with the planning system, with some applications taking a considerable time to process, and that having a shorter time frame within which planning decisions will be made could be positive. However, the setting of an apparently arbitrary six month timeframe within which all large scale planning decisions are to be made is not without its problems. For example, no definition was offered as to what decisions will be defined as large scale and whether or not this is a realistic ambition. In England national projects are given a twelve month deadline because of the scale and complexity of the applications and it may be the case that some/many/the majority of the large scale planning decisions in Northern Ireland may take more than six months simply because of the complexity of the case in hand which raises the question as to whether the six month deadline is the most realistic and pragmatic option.

WWF Northern Ireland is much more concerned about the potentially unlawful proposal to give applications with job creation potential additional weight.

The purpose of any planning system must be to achieve sustainable development. This ensures the *integration* of economic, environmental and social objectives in plan making as well as *equal* consideration of economic, environmental and social impacts and benefits in the assessment of proposed forms of development. The basic premise of the proposed change to the planning system is completely inconsistent with this overarching purpose of planning, as it proposes to give additional weight to the job creation potential of a proposal. The express intent of this policy is that job creation considerations are to be elevated above all others, including environmental and social considerations, regardless of any negative impacts that may arise as a result of the development. WWF Northern Ireland simply cannot agree with or support this policy. This proposed approach runs contrary to many, if not all, other existing Northern Ireland sustainable development policies. Furthermore, there is no definition given for the threshold of job creation potential that will apply, with the result that the present wording means that potentially a project that may create one short term job, could be given the go ahead no matter what the potential impacts of the proposal. WWF Northern Ireland would like to emphasise that even if a threshold for job creation potential were to be included in any rewording of this draft target it would make no material difference as the basic premise of this proposal is completely flawed. This draft target, in effect, potentially gives *carte blanche* for virtually any development to proceed on the basis that it has job creation potential, a situation which WWF Northern Ireland regards as inappropriate, unacceptable and, where it overlaps with relevant provisions of domestic and EU law, potentially unlawful.

WWF Northern Ireland would like to emphasise that it does not oppose development *per se*, including development that is aimed at securing economic development. In fact, WWF Northern Ireland is a strong advocate of sustainable development and believes that sustainable development offers many positive opportunities for Northern Ireland, including many of the potential economic benefits the draft PfG seems keen to facilitate. However, any such development must respect environmental limits and development aimed at delivering economic benefits must be assessed in the context of achieving sustainable economic growth, which has been defined in the English PPS 4 'Planning for Sustainable Economic Growth'⁽²²⁾ as meaning

"growth that can be sustained and is within environmental limits, but also enhances environmental and social welfare and avoids greater extremes in future economic cycles".

In making a decision *all* relevant and material considerations must be assessed equally and weighted according to the circumstances of the case. There should be no predetermined weight given to any matter, as the determination of weight to be accorded to a material consideration must be for the decision maker

taking into account all the circumstances of the particular application being assessed. No other issue in the environmental or social spheres, has been given overriding priority in the planning process and a fundamental question remains as to why it seems the Executive wish to take this approach when a virtually identical proposal in draft PPS 24 for economic considerations to be given additional weight was rejected by the Minister for Environment?

The legitimacy of this proposed approach, whereby the implications in terms of job creation potential are given priority above all other implications in the planning process, remains undetermined, as it appears that the current draft PfG 2011-15 is not compatible with other existing national legal obligations, including the Wildlife (Northern Ireland) Bill 2010, and international obligations, including the EU Habitats Directive and Birds Directive, and existing government policy, including, PPS 1, PPS 2, PPS 4, the Regional Development Strategy and the Northern Ireland Act 2006 .

For example, according to PPS 1, which outlines the general principles of planning in Northern Ireland, the role of planning

“is to regulate the development and use of land in the public interest”.

However, the current wording of the draft PfG 2011-15 does not appear to account for this strategic, overarching aim, and is possibly even contrary to it. WWF Northern Ireland believes that the public interest would best be served by balancing a number of potentially competing interests and benefits, not by prioritising economic implications, above all others, especially when the scale of the benefits, for example, in terms of time scale and geographical extent, and the potential negative impacts, may not be made clear.

PPS 1, paragraphs 12, on pages 7 and 8, also states that

In working towards sustainable development, the Department will aim to:

- *plan for the region’s needs for commercial and industrial development, food production, minerals extraction, new homes and other buildings, while respecting environmental objectives;*
- *conserve both the archaeological and built heritage and natural resources (including wildlife, landscape, water, soil and air quality), taking particular care to safeguard designations of national and international importance;*
- *shape new development patterns in ways which minimise the need to travel;*
- *give preference, in the zoning of land, to the development of brownfield sites within built-up areas, before considering the development of greenfield sites, provided that this creates or maintains a good living environment.*
- *encourage the use of already developed areas in the most efficient way, while making them more attractive places in which to live and work; and*
- *concentrate developments that generate a large number of trips in places well served by public transport*

PPS 2, Paragraph 13, page 8 also states that

“In formulating policies and plans and in determining planning applications the Department will be guided by the precautionary principle that, where there are significant risks of damage to the environment, its protection will generally be paramount, unless there are imperative reasons of overriding public interest.”

The objectives of the revised version of PPS 2, on Planning and Nature Conservation currently the subject of consultation, as stated in paragraph 3, page 10 are:

- *to seek to conserve, enhance and restore the abundance, quality, diversity and distinctiveness of the region's natural heritage;*
- *to promote sustainable development; and*
- *to assist in meeting international, European, national and local responsibilities and obligations for natural heritage.*

PPS 4 on Planning and Economic Growth states on page 3 that

“Economic growth is considered the Executive’s top strategic priority in its first Programme for Government (PfG), in order to raise the quality of life for the people of Northern Ireland, through increasing economic opportunities for all, on a socially and environmentally sustainable basis.”

The stated aim of PPS 4 as outlined in paragraph 1.4 on page 3 is

“to facilitate the economic development needs of the Region in ways consistent with protection of the environment and the principles of sustainable development.”

The first objective listed in paragraph 3.1 on page 7 of PPS 4 is

“to promote sustainable economic development in an environmentally sensitive manner;”

The basic premise of the current draft PfG 2011-15 to give determinative weight to job creation potential alone, seems at odds with existing planning policy, as outlined in the examples given above.

As outlined in paragraph 2.2., on page 12, the spatial strategy of the Executive, the Regional Development Strategy (RDS) ‘Shaping Our Future’ *“has at its heart sustainable development”* and one of its eight aims is to

“Protect and enhance the environment for its own sake”

Furthermore, no reference is made, amongst other things, to Northern Ireland’s established, legally binding national and international nature conservation designations and environmental commitments. The lack of an explicit statement in draft PfG 2011-15 that, for example, all pertinent legal obligations resulting from all national and international designations and commitments must be fully adhered to and complied with, leaves open the possibility that these legal obligations and commitments may not be fully complied with. WWF Northern Ireland would regard the possibility of this target in the draft PfG 2011-15 permitting or enabling non compliance with existing national and international legal obligations and commitments as inappropriate, unacceptable and potentially unlawful. WWF Northern Ireland regards it as totally inappropriate and unacceptable to attempt to relegate environmental, social and public health and safety considerations to a secondary status in planning policy, as this draft target appears to do.

The position of the Office of the First Minister and Deputy First Minister (OFMDFM) in relation to the balance between economic development and sustainable development explicitly states⁽²³⁾

“The development of the Northern Ireland economy is important but it must not be our only consideration. There needs to be a balance between prosperity, people, and our environment.....What this means is that we must ensure that all of our actions take account of their economic, social and environmental consequences”

The current wording of draft PfG 2011-15 seems to be at odds with this position and also risks non compliance with the statutory duty in the Northern Ireland (Miscellaneous Provisions) Act 2006 Section 25, that⁽²⁴⁾ :

“a public authority must, in exercising its functions, act in a way it considers best calculated to contribute to the achievement of sustainable development in Northern Ireland ...”

Since the wording of draft PfG 2011-15 means that, for example, it will not ensure the protection or enhancement of our environment, it appears incompatible with this duty and the other strategic duties and policies and national and international obligations and commitments referred to above, and as such is potentially unlawful.

Since the issue is with the proposed prioritisation of job creation potential of an application above all other implications, WWF Northern Ireland's concerns with draft PfG 2011-15 are unlikely to be resolved by any amended wording, as WWF Northern Ireland regards the basic premise of this proposed change, just as was the case with the previously proposed PPS 24, which proposed economic considerations be given priority over all other considerations, as unacceptable, not compliant with other strategic government duties and policies and potentially unlawful. **Consequently, WWF Northern Ireland recommends that the proposal to give proposals with job creation additional weighting in the planning process, as outlined in draft PfG 2011-15 must be withdrawn.**

- **Target: Encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015 (DETI).**

WWF Northern Ireland has welcomed the targets in the 2010 SEF for 40% of electricity and 10% of heat to come from renewable sources by 2020. As of 2011, around 10% of Northern Ireland's electricity comes from renewable sources. While targets to increase the production and consumption of renewable energy are welcome, the wording of this target is vague. For example, it is unclear from the above wording exactly why industry has been singled out and what DETI will do to encourage industry to achieve a 20% target of electricity consumption from renewable electricity and 4% renewable heat by 2015 and what impact that will have, especially given DETI's potential conflict of interest in relation to the gas network. WWF Northern Ireland is concerned that there is a potential conflict of interest, arising from DETI's statutory responsibility, as outlined for example, in paragraph 4.3 on page 28 of the recent consultation on the development of a renewable heat incentive

"to promote the development and maintenance of an efficient, economic and co-ordinated gas industry in Northern Ireland".

This potential conflict of interest appears to manifest itself in the position described by the last two sentences in paragraph 4.3 of that consultation which state

"The movement of existing natural gas customers or potential gas customers in towns where the gas network could be easily extended to renewable heat technologies could potentially have an adverse impact on the gas network. Therefore in supporting the heavy industrial sector it is important that the existing or future gas network is not affected".

Paragraph 6.6 on page 34 makes outcome of any potential choice between natural gas and renewable heat even more explicit:

"Therefore DETI does not intend for the introduction of incentive measures for renewable heat to impact on the existing or future gas market but instead expect to grow the renewable heat market at the same time as increasing the market share of natural gas."

The implication of this approach appears to be that renewable heat should not be allowed to encroach into either the existing gas network or areas into which the gas network may expand. WWF Northern Ireland is concerned that the current statutory duty on DETI as outlined in the consultation means that DETI will take a protectionist approach, whereby the use of gas is to be prioritised over the potential use of renewable energy sources, *"so that the existing or future gas network is not affected"* by the potential expansion of the renewable heat network. WWF Northern Ireland is concerned that as a consequence of this duty, there is the potential for DETI policy and action to be compromised and that there is a risk that customers, both domestic and industrial, may not be afforded complete freedom to choose a renewable heating option, if they wish to and that a potential renewable heat supplier may not be allowed to expand into an area if there is an existing gas supply, or even plans for a potential gas supply, because of this duty. The 2011 RHI report for DETI⁽²⁵⁾ also found (page 11) that if large industrial users

"were to switch to renewable heat, this would conflict with DETI's objective to extend the gas network"

This is a situation that needs to be addressed and WWF Northern Ireland would recommend that this statutory duty is either amended, so that for example, the word 'gas' is replaced with the word 'energy', so that the duty is then *"to promote the development and maintenance of an efficient, economic and co-ordinated energy industry in Northern Ireland"* or scrapped.

- **Target: Eliminate Air Passenger duty on direct long haul flights (DFP)**

WWF Northern Ireland believes the APD should be retained rather than eliminated.

Priority 2: Creating Opportunities, Tackling Disadvantage and Improving Health and Wellbeing

- **Target: Introduce and support a range of initiatives aimed at reducing fuel poverty across Northern Ireland including preventative interventions (DSD)**

Northern Ireland has higher levels of fuel poverty than other parts of the UK or Ireland with 44% of households experiencing fuel poverty. As a result, while WWF Northern Ireland would support the reduction of fuel poverty across Northern Ireland, WWF Northern Ireland believes that the aim of the Executive must be to eradicate fuel poverty, rather than just reduce it. A key component of tackling fuel poverty must be the improvement of the energy efficiency standards of buildings, through greatly improved building regulations and/or the installation of insulation and other energy saving options throughout existing building in order to reduce the energy demand of the building in the first place.

- **Target: Ensure no additional water charges during this Programme for Government**

The Water Framework Directive required Member States to ensure by 2010 that water pricing policies provide adequate incentives to use water resources efficiently and thereby contribute to the environmental objectives of the Directive. That is, to ensure that water quality in freshwater bodies is of at least 'Good Ecological Status' by 2015.

In Northern Ireland, water customers do not pay directly for domestic water and sewerage services. The introduction of domestic water charging has been consistently deferred for political reasons despite the fact that providing water and sewerage services in Northern Ireland is costing the public purse around £300million per year with no incentive to reduce waste or allow people to only pay for what they use.

The costs associated with water and sewerage supply comprise collection and treatment of water, disposal of sewage, energy costs, improvements to the supply network, reducing leakage, preventing sewer flooding and conserving the natural environment. More efficient use of water means less water is taken out of the environment for treatment which keeps costs efficient and avoids costly capital investment in new water resource development.

Currently, water and sewerage services are part financed by revenue raised through Rates. As regional rates are unhypothecated, it is not clear how much is spent on water and sewerage services. In reality, the figure has been estimated at £109m. Yet, the total cost of water and sewerage services is much, much more. The shortfall is funded from the Northern Ireland Block Grant, which means less money is available for other public services, such as health, education or indeed, environmental protection.

The need to fully fund water services and free up public funds is becoming imminent as pressures on budgets take their toll. In addition, WWF Northern Ireland believes there is a need to fully comply with Article 9 of the Water Framework Directive. Whilst Executive agreed not to introduce any form of charging during the current mandate, a target within the Programme for Government should be to investigate and agree a methodology for the introduction of domestic water charging by 2016. This should include a communications campaign with the general public to raise awareness about the need to reflect the true costs of water supply and the benefits of more efficient use of water and related energy, given that Northern Ireland Water are currently the largest users of electricity in Northern Ireland.

WWF Northern Ireland believes that socially responsible water pricing is essential to incentivise efficient use of water, to ensure that water users pay for what they use and to ensure that the true value of water is reflected in how we manage water. This value should incorporate the cost to the environment. WWF UK

have recently run campaigns to increase the proportion of water meters to improve understanding about water usage and promote efficient use of water in homes throughout England and Wales, as well as consideration of social issues related to water charging to ensure a system that is fair for all.

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

- **Target: Implement a levy on single use carrier bags by 2013 (DOE)**

WWF Northern Ireland is concerned about how the levy on single use carrier bags has been managed. In addition to the reduction in income for the DoE of £15.4 million outlined in the draft 2011/12 DoE⁽²⁶⁾ budget, an additional £4 million was taken out of DoE core budget to pay for the Green New Deal, which takes the total reduction in income up to £19.4 million. This additional £4 million is due to be replaced by the £4 million predicted to be generated by a plastic bag levy (of 15p per bag).

WWF Northern Ireland is supportive of a plastic bag levy as a means of, hopefully, reducing the consumption of fossil fuel (oil) derived plastic carrier bags and is supportive of the Green New Deal as a means of reducing our carbon footprint while creating 'green' jobs. However, WWF Northern Ireland has a number of concerns about how it is proposed the plastic levy will operate and how the Green New Deal will be funded. Above all, WWF Northern Ireland believes that plastic bag levy should be a source of additional funds and not an alternative to core funding for DoE. The Green New Deal should be funded through new and/or additional revenue streams, such as the proposed plastic bag levy, rather than from existing departmental budgets and certainly not from the budget of the DoE alone. Given the Green New Deal is likely to help meet the aims and objectives of more than one department, the Green New Deal should be funded by contributions, financial and otherwise, from a number of departments. The DoE should not be solely responsible for providing the financial support for the Green New Deal.

As such, WWF Northern Ireland believes it is totally inappropriate for the DoE core budget to have been cut by £4 million to fund the Green New Deal, and for the proposal for this £4 million to be replaced by the anticipated revenue from the plastic bag levy. The primary driver for any plastic bag levy should be the incentive to reduce the consumption of fossil fuel (oil) based plastic carrier bags, not as a potential revenue stream, which appears to be the approach being taken to how this levy will operate.

- **Target: Continue to work towards a reduction in greenhouse gas emissions by at least 35% on 1990 levels by 2025 (DOE)**

WWF Northern Ireland welcomes this target, but believes that the Executive should have been more ambitious. While this target is actually higher than the target in the UK Climate Change Act of 2008 for a 34% reduction in emissions compared to 1990 levels by 2020, the Climate Change (Scotland) Act 2009 target is to reduce Scotland's emissions of the basket of six Kyoto Protocol greenhouse gases by 42% by 2020 and 80% by 2050, compared to the 1990/1995 baseline (the baseline for carbon dioxide, methane and nitrous oxide is 1990, while for the other gases (HFCs, PFCs and SF₆) it is 1995).

- **Target: Protect and enhance our natural environment by working to halt the loss of biodiversity**

WWF Northern Ireland would support this target, and believes the loss in biodiversity does need to be halted, but the target is vague and the many other actions of the various departments suggest that the above are little more than token words. For example, according to page 82 of the 2011-15 budget⁽²⁶⁾, DoE will also seek further savings of £4.3 million across a range of environmental programmes within NIEA, and in areas including environmental protection. WWF Northern Ireland previously responded to the consultation on the draft DoE budget 2011-15 and expressed its concern that in that budget DoE was proposing to cut some of the money necessary to comply with the EU Water Framework Directive (WFD) and Environmental Noise Directive, with the understanding that there will not be any replacement funding (from the plastic bag levy) for these areas of work for over a year. WWF Northern Ireland regards this as an inappropriate and irresponsible choice on behalf of DoE, which reflects a lack of appropriate prioritisation on behalf of DoE, as it means the department's legal requirements and by extrapolation, Northern Ireland's legal requirements, may not be met. WWF Northern Ireland would not and does not support the suspension or postponement of programmes of work which are required to

comply with EU Directives, as this is not only detrimental to our environment but also exposes Northern Ireland to the risk of legal action and/or infraction fines from Europe and WWF Northern Ireland believes that alternative areas for cuts need to be indentified as this course of action is not something WWF Northern Ireland can or will support. In light of the inexcusable and abject failure of the DoE and DARD to adequately protect the horse mussels in Strangford Lough, designated under the 1992 EU Habitats Directive, this sort of cut is only likely to do further damage to our environment. In relation to the specific issue of Strangford Lough, WWF Northern Ireland would be interested to know what plans the Executive has made for the potential imposition of large infraction fines from Europe arising from the failure of DoE and DARD to protected the horse mussel beds in Strangford Lough, given that any fine levied on the UK will in turn be taken out of the Northern Ireland block grant.

WWF Northern Ireland is also concerned about the proposal in the draft DoE budget (paragraph 4.16) that

“There will be a reduction in proactive pollution prevention and reduced capacity to non planned monitoring requirements to establish the source of pollution or the impact of such incidents”

While WWF Northern Ireland would like greater detail as to exactly what this proposal entails, accounting for the already inadequate monitoring of rivers, lakes and groundwater and of pollution incidents in these bodies, and the requirements of the WFD, WWF Northern Ireland regards this proposal as unacceptable. The monitoring of pollution incidents in order to identify the cause and source of the incident and, if appropriate, the prosecution of the polluter, is, in essence, the only effective and visible deterrent to those who for whatever reason do not comply with pollution related legislation and policy. Any proposal to scale back on this area of work, which urgently needs to be expanded and upgraded, rather than reduced and downgraded, is unacceptable to WWF Northern Ireland.

The overall situation regarding Northern Ireland’s biodiversity has a lot of room for improvement. For example, according to the DoE Environmental Statistics report 2012 ⁽²⁷⁾ only 4 out of 51 priority habitats were increasing in 2008 and only 1 out of 481 priority species were increasing in 2008. With this level of performance, WWF Northern Ireland believes that rather than being cut back, more resources need to be allocated to and invested in managing and monitoring Northern Ireland’s biodiversity and our priority habitats and species in particular. WWF Northern Ireland recognises that this draft PfG only covers the period up to 2015 but would urge the Executive, in the medium to longer term, to aim to not just halt the loss of biodiversity, but to restore and enhance native biodiversity.

- **Target: To invest over £500 million to promote more sustainable modes of travel.**

While this proposed investment sounds positive, WWF Northern Ireland believes the Executive needs to spell out exactly what this £500m will be spent on. According to page 91 of the draft 2011-15 budget ⁽²⁶⁾

“DRD has been allocated over £2 billion of capital investment over the budget period. This includes almost £1.2 billion for Roads, around £200 million for public transport and around £668 million for water and sewerage services”

There no mention in the draft budget of £500 million for sustainable transport, only for £200 million for capital investment in public transport. WWF Northern Ireland understands that approximately £300 million may be allocated to a range of public grants and subsidies including concessionary fares and funding for the railway network, but believes clarification is needed. In any case, a £500m investment should make a significant and quantifiable impact on the level of sustainable transport provision and use in Northern Ireland and so the mere ‘promotion’ of sustainable modes of transport is not an appropriate target, as it is not really a target at all, and certainly not a SMART target, merely an aspiration. WWF Northern Ireland therefore believes this target needs to be reworded so as to include appropriate impacts and targets.

WWF Northern Ireland did not support and had criticised the huge imbalance in spending in favour of roads in the previous 2008-11 budget and recommended that in the next budget there be at least a 50-50 split in spending on roads and sustainable transport. However, based upon the figures in the draft budget

for 2011-15, only 10% of DRD's budget (£200 million out of £2 billion) is to be spent on public transport while around 60% (£1.2 billion) is to be spent on roads. WWF Northern Ireland is very disappointed that the Executive has chosen not to redress the imbalance in spending on roads and more sustainable transportation options and believes that the proposals in the draft 2011-15 budget are likely to only exacerbate the disproportionate problem that exists in relation to transport emissions in Northern Ireland. Emissions from road transport represented 28.2% of Northern Ireland's total Carbon Dioxide (CO₂) emissions in 2008, an increase of 39.5% since 1990, with cars responsible for 54% of the CO₂ emissions from the road transport sector in 2008 while HGVs contributed 36%. By contrast, road transport represents only 22% of the UK's total CO₂ emissions and grew by only 7% since 1990⁽²⁸⁾. The shortcomings in our transport system also cost us money, as was illustrated by PA Consulting, who claimed that congestion costs the Northern Ireland economy over £250 million a year⁽²⁹⁾.

Given the many problems with Northern Ireland's infrastructure the proposals to include reduced subsidy rates to Translink and a reduced service specification from Park and Ride is going in the wrong direction. The Executive should be investing more in sustainable and public transport as opposed to private transport options and infrastructure most notably, the estimated spend of approximately £720 million, accounting for the 90% reduction in funding recently proposed by the government in the Republic of Ireland, for the A5 improvements. Based on a projected total cost of approximately £800 million for the A5 upgrade, and the projected reduction in travelling times between Aghnacloy⁽³⁰⁾ and Derry of approximately 20 minutes, this represents an investment of approximately £40 million per (one) minute of travelling time it is predicted could be saved by this proposed improvement. WWF Northern Ireland does not regard the A5 proposal and the announcement on 14th February 2012 that almost £500 million is to be spent upgrading it, along with the A2 and A8, as best value for money for Northern Ireland and regards the Executive's approach to the DRD budget as a major failure.

The relatively small spend on public transport proposed in the draft PfG 2011-15 contrasts with the higher priority given to public transport in the Republic of Ireland which in the 2007-2013 National Development Plan (NDP)⁽³¹⁾ pledged just under €13 billion for public transport out of a total of €33 billion on infrastructure. There is an even sharper contrast with the plans announced by the Danish government in December 2008⁽³²⁾ of a "*green traffic initiative*" featuring infrastructure investments and transport measures costing Dkr150bn (€20bn) over the next decade. According to the Danish plan, about two-thirds of the total will be spent on "*renovating, improving and developing the railway network*" with the aim of converting motorists to public transport. High emissions charges, road pricing, and financial incentives for fuel-efficiency are among a raft of additional measures. Similar strategic thinking and investment in greater public transport would be welcome in Northern Ireland.

Target: 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)

WWF Northern Ireland welcomes this target and would urge the Executive to ensure sufficient funds are allocated to measures which support active school travel to enable the target to be delivered.

Target: Maintain a high quality of drinking water and improve compliance with waste water standards by investing £600m in water and sewerage infrastructure

WWF Northern Ireland supports the target to maintain a high quality of drinking water. However, we would stress that the provision of high quality drinking water is expensive and should be used more efficiently. It is not necessary to use fresh drinking water to flush the toilet or water the garden, for example. Government should promote measures to reuse rainwater and greywater recycling systems that are cost effective and energy efficient.

In addition, we support the continued investment in our water and sewerage infrastructure but stress that this investment should be prioritised to upgrade existing infrastructure, for example to reduce leakage rates, rather than to increase capacity for water supply through additional capital projects. WWF Northern Ireland believes that any anticipated deficits in water supply-demand balance should be firstly addressed through the promotion of more water efficient behaviour.

Targets that WWF Northern Ireland believes should be included in the draft PFG 2011-15

There are a number of issues that WWF Northern Ireland believes should be addressed in the draft PFG 2011-15, but which were omitted. In particular, WWF Northern Ireland believes that firm commitments should have been made in the draft PFG to

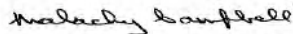
- Prioritise the development of a low carbon economy and clearly identify in the PFG how public expenditure will be invested in low carbon, resource efficient local and sustainable aspects of the economy, supporting the delivery of both footprint reduction and economic development targets. Clear targets for reducing energy demand should be set as part of this plan and a target to reduce energy demand by at least 20% by 2020 would be a good starting point.
- The introduction of a Climate Change Act for Northern Ireland, with targets for greenhouse gas (GHG) emissions that at least match those in the UK Climate Change Act of 2008, namely to reduce GHG emissions compared to a 1990 baseline by at least 34% by 2020 and 80% by 2050
- Develop a long term (to 2050) energy strategy which is costed and sets clear mandatory targets to reduce our overdependence on fossil fuels and increase energy production from renewables and which matches the target for the UK in the EU Renewable Energy Directive of having 15% of energy generated from renewable sources by 2020. Research by the Carbon Trust has shown that if NI matched this target for the UK approximately 33,124, or more, high value jobs could be created in an industry worth approximately £989 million annually in Northern Ireland⁽¹⁹⁾.
- The introduction of a Marine Act for Northern Ireland which will: deliver the commitments made by Northern Ireland when it signed up to the UK Marine Policy Statement; ensure the sustainable management of our seas through the adoption of an ecosystem based approach; establish a network of marine protected areas in line with the targets of the UK Marine Act of 2009; establish a Marine Management Organisation (MMO) to oversee and implement a new system of marine spatial planning (MSP), which integrates with the UK MSP aims and objectives introduce legislation to deliver sustainable fisheries management.
- The full implementation of the EU Water Framework Directive This includes:
 - A secure source of funding to implement River Basin Management Plans. The DOE budget revealed that the Executive proposes to fund River Restoration activities for £1.1m annually from revenue raised through the plastic bag levy. This amount is less than half of the £8.8m initially requested by NIEA to fund WFD implementation. In addition, revenue raised from the plastic bag levy is not certain, and if it is effective as a levy, should see a decline over time. 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. If we are to restore our freshwater environment and comply with our European requirements, it is essential that this shortfall in funding is prioritised.
 - Adequate levels of monitoring and enforcement supplemented by community initiatives to ensure compliance with pollution policies. 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 and defective septic tanks. The draft 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.
 - Improved abstraction licensing to ensure abstraction levels are sustainable and take account of the full impact on river habitats. 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 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.
 - Plans are in place to deliver conservation targets in 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

current 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.

- Introduce a duty to promote a sustainable flood management approach by all departments to manage Northern Ireland's flood risk, working with natural systems 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 Water Framework Directive targets.
- Establishing an Environmental Protection Agency for Northern Ireland before 2015
- Ensure Executive support for the greater use of electric vehicles, powered by electricity generated from renewable sources, inter alia, by setting a Northern Ireland level target for at least 10% of all vehicles and all of the public sector vehicle fleet to be electric by 2020.
- Adopt Northern Ireland's Ecological Footprint (an internationally recognised measure of the sustainability of our resource use) as a key indicator in the Northern Ireland Sustainable Development Strategy's Implementation Plan and establish clear targets for the reduction of Northern Ireland's ecological footprint, especially in terms of carbon (footprint).

Finally, though it is not referred to explicitly in the PfG, WWF Northern Ireland understands that the financial support for the Carbon Trust, which comes from Invest NI, will be terminated at the end of this financial year, i.e. in a matter of months, despite the previous achievements of the Carbon Trust. This course of action is likely to result in the loss of the jobs, and the bank of expertise, that resides within the Northern Ireland Carbon Trust office and not only is it not clear that this proposed course of action will save money, but, as WWF Northern Ireland understands it, it appears likely that this course of action may well incur additional costs. It is WWF Northern Ireland's understanding that no other Carbon Trust office is faced with potential closure, which would mean Northern Ireland would be the only administration in the UK without a local Carbon Trust office and operation and in this context, it might be worth re-examining this proposal.

Yours faithfully



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References

- (1) AEA Technology Executive Summary of a report on the assessment of the potential for bioenergy development in Northern Ireland Report to DETI October 2008
- (2) <http://www.unep.org/Documents/Multilingual/Default.asp?DocumentID=659&ArticleID=6902&I=en>
- (3) BP Statistical review of World Energy 2008, available at http://www.bp.com/liveassets/bp_internet/china/bpchina_english/STAGING/local_assets/downloads_pdfs/statistical_review_of_world_energy_full_review_2008.pdf
- (4) BP Statistical Review of World Energy 2011 available at http://www.bp.com/liveassets/bp_internet/globalbp/globalbp_uk_english/reports_and_publications/statistical_energy_review_2011/STAGING/local_assets/pdf/statistical_review_of_world_energy_full_report_2011.pdf
- (5) The disclaimer on page 2 of the 2011 BP Statistical Review of World Energy states “*The data series for proved oil and gas reserves in BP Statistical Review of World Energy June 2011 does not necessarily meet the definitions, guidelines and practices used for determining proved reserves at company level, for instance, under UK accounting rules contained in the Statement of Recommended Practice, ‘Accounting for Oil and Gas Exploration, Development, Production and Decommissioning Activities’ (UK SORP) or as published by the US Securities and Exchange Commission, nor does it necessarily represent BP’s view of proved reserves by country. Rather, the data series has been compiled using a combination of primary official sources and third-party data*”
- (6) The Peak of the Oil Age – analyzing the world oil production Reference Scenario in World Energy Outlook 2008 published Energy Policy Volume 38, Issue 3 March 2010 pages 1398-1414
- (7) <http://www.northernireland.gov.uk/news/news-deti/news-deti-november-2009/news-deti-131109-foster-seeks-sustainable.htm>
- (8) Invest NI Sustainable Energy Maximising Business Opportunities from Sustainable Energy
- (9) DETI “*Delivering Northern Ireland’s 1% Energy Efficiency Target An Overview*”
- (10) <http://www.bloomberg.com/news/2010-09-14/europe-could-save-100-billion-on-power-efficiency-climate-report-says.html>
- (11) http://www.decnr.gov.ie/NR/rdonlyres/FC3D76AF-7FF1-483F-81CD-52DCB0C73097/0/NEEAP_full_launch_report.pdf
- (12) http://www.erneuerbare-energien.de/files/pdfs/allgemein/application/pdf/ee_in_deutschland_graf_tab_2009_en.pdf
- (13) <http://www.greenpeace.org.uk/climate/the-case-against-coal-frequently-asked-questions>
- (14) “Effects of the Expansion of Renewable Energies on the German Labour Market with Special Consideration of Foreign Trade” carried out 2004-2006 by Baden-Württemberg’s Centre for Solar Energy and Hydrogen (ZSW, Stuttgart; project management), the German Institute for Economic Research (DIW, Berlin), the German Aerospace Center (DLR, Stuttgart) and the Institute of Economic Structures Research (GWS, Osnabrück).
- (15) http://www.bmu.de/english/current_press_releases/pm/40276.php
- (16) <http://www.erneuerbar.info/inhalt/41914/42719/pdf/pdf/41914.pdf>
- (17) Offshore Valuation Report July 2010 – <http://www.offshorevaluation.org/>
- (18) Carbon Trust *Focus for success: A new approach to commercialising low carbon technologies*
- (19) *Jobs and Investment in Irish Wind Energy Powering Ireland’s Economy* Deloitte and IWEA 2009
- (20) NI Renewable Energy Supply Chain 2008, Carbon Trust report by Roger Tym and Partners. Figures also available in the Carbon Trust NI submission to the Environment Committee Inquiry into Climate Change February 2009, available at http://www.niassembly.gov.uk/environment/2007mandate/envir_climateChangeSubmissions.htm
- (21) <http://www.scotland.gov.uk/Resource/Doc/331364/0107855.pdf>
- (22) <http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement4.pdf>
- (23) See <http://www.ofmdfmi.gov.uk/index/economic-policy/economic-policy-sustainable-development.htm>
- (24) <http://www.legislation.gov.uk/ukpga/2006/33/section/25>
- (25) The final report for DETI on the RHI by Cambridge Economic Policy Associates Ltd and AEA Technology http://www.deti.gov.uk/economic_appraisal_into_the_northern_ireland_rhi_-_june_2011.pdf
- (26) http://www.northernireland.gov.uk/revised_budget_-_website_version.pdf
- (27) http://www.doeni.gov.uk/northern_ireland_environmental_statistics_report_2012.pdf
- (28) AEA Greenhouse Gas Inventories for England, Scotland Wales and Northern Ireland 1990-2008 September 2010 available at http://www.airquality.co.uk/reports/cat07/1009070945_DA_GHGI_report_2008_maintext_Issue_1.pdf
- (29) PA Consulting “Northern Ireland economy burns £250 million a year in roads slow lane” (2008), available at <http://www.paconsulting.com/introducing-pas-media-site/releases/northern-ireland-economy-burns-250-million-a-year-in-roads-slow-lane-23-may-2008/>
- (30) <http://www.belfasttelegraph.co.uk/news/local-national/new-a5-aughnacloy-to-derry-route-could-slash-journey-times-14421352.html>
- (31) <http://www.ndp.ie/documents/ndp2007-2013/NDP-2007-2013-English.pdf>
- (32) <http://www.endseurope.com/index.cfm?go=17237&view=print>