

Response ID ANON-C6MZ-A77T-3

Submitted to Draft Programme for Government Consultation 2024-2027

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About you

Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation

About you - Organisation

Please provide your organisation's contact details below:

Organisation name::

Ulster Wildlife

Organisation email address:

peter.mcevoy@ulsterwildlife.org

Which of the following best describes the sector you work in?

Charity

Other (please specify):

Can we contact you to discuss your response to this consultation?

Yes

Can we contact you in future about the draft Programme for Government?

Yes

To support transparency in our decision making process, we will publish a summary of the consultation feedback on the PfG webpage. This will sometimes include the responses themselves and may mention names of the responding organisation (if applicable). However, names of individuals responding on a personal capacity will only be published where consent has been given. Please note we will not publish contact details.

Yes, I consent to my name being published with my response

Doing What Matters Most Today: 'Grow a Globally Competitive and Sustainable Economy'

How much do you agree that the priority 'Grow a Globally Competitive and Sustainable Economy' should be included in the Programme for Government?

Competitive_Economy - Grow a Globally Competitive and Sustainable Economy:

Neither agree nor disagree

The draft Programme for Government has set out actions that we plan to take under the priority 'Grow a Globally Competitive and Sustainable Economy'. How much do you agree that these are the right actions to take?

Grow_Competitive_Economy_Actions - 'Grow a Globally Competitive and Sustainable Economy' Actions:

Neither agree nor disagree

Please provide any other comments you have in relation to the 'Grow a Globally Competitive and Sustainable Economy' priority:

Please enter any comments in the box below:

Ulster Wildlife is supportive of a sustainable economy but has concerns around the concept of growth where that involves the consumption of more natural resources and increased pollution.

We are supportive of job creation and incentivisation of emerging industries that support 'nature-based solutions' for mitigating the effects of climate change and enhancing biodiversity. Peatland restoration is one such area where significant employment can be focused on restoring nature and reducing NI's emissions. The work Ulster Wildlife has done on the reintroduction of native oysters has demonstrated the valuable role of restoring natural processes that, when scaled up, can help with water quality through filtration and coastal erosion through the formation of biogenic reefs. Through habitat and species conservation we can provide ecosystem services which support sustainable development goals. These rely on skill individuals trained in regionally specific work areas.

Careful consideration needs to be given to the Environmental Principles Policy Statement as well as other strategies, such as Green Growth and EIP to ensure alignment.

Doing What Matters Most Today: 'Deliver More Affordable Childcare'

How much do you agree that the priority 'Deliver More Affordable Childcare' should be included in the Programme for Government?

Childcare_Priority - Deliver More Affordable Childcare:

The draft Programme for Government has set out actions that we plan to take under the priority 'Deliver More Affordable Childcare'. How much do you agree that these are the right actions to take?

Childcare_Actions - 'Deliver More Affordable Childcare' Actions:

Please provide any other comments you have in relation to the 'Deliver More Affordable Childcare' priority:

Please enter any comments in the box below:

Doing What Matters Most Today: 'Cut Health Waiting Times'

How much do you agree that the priority 'Cut Health Waiting Times' should be included in the Programme for Government?

Health_Waiting_Priority - Cut Health Waiting Times:

The draft Programme for Government has set out actions that we plan to take under the priority 'Cut Health Waiting Times'. How much do you agree that these are the right actions to take?

Health_Wait_Times_Actions - 'Cut Health Waiting Times' Actions:

Please provide any other comments you have in relation to the 'Cut Health Waiting Times' priority:

Please enter any comments in the box below:

Access to nature and open space has been proven to increase health and wellbeing. This has an impact on reducing the need for healthcare intervention and investment in nature and public access to green space as well as 'green prescribing' should be considered as one of the tools in delivering more sustainable health outcomes

Doing What Matters Most Today: 'Ending Violence Against Women and Girls'

How much do you agree that the priority 'Ending Violence Against Women and Girls' should be included in the Programme for Government?

Ending_Violence_Women/Girls_Priority - Ending Violence Against Women and Girls:

The draft Programme for Government has set out actions that we plan to take under the priority 'Ending Violence Against Women and Girls'. How much do you agree that these are the right actions to take?

Ending_Violence_Women/Girls_Actions - 'Ending Violence Against Women and Girls' Actions:

Please provide any other comments you have in relation to the 'Ending Violence Against Women and Girls' priority:

Please enter any comments in the box below:

Doing What Matters Most Today: 'Better Support for Children and Young People with Special Educational Needs'

How much do you agree that the priority 'Better Support for Children and Young People with Special Educational Needs' should be included in the Programme for Government?

Support_Children_SEN_Priority - Better Support for Children and Young People with Special Educational Needs:

The draft Programme for Government has set out actions that we plan to take under the priority 'Better Support for Children and Young People with Special Educational Needs'. How much do you agree that these are the right actions to take?

SEN_Actions - 'Better Support for Children and Young People with Special Educational Needs' Actions:

Please provide any other comments you have in relation to the 'Better Support for Children and Young People with Special Educational Needs' priority:

Please enter any comments in the box below:

Doing What Matters Most Today: 'Provide More Social, Affordable and Sustainable Housing'

How much do you agree that the priority 'Provide More Social, Affordable and Sustainable Housing' should be included in the Programme for Government?

Affordable_Housing_Priority - Provide More Social, Affordable and Sustainable Housing:

The draft Programme for Government has set out actions that we plan to take under the priority 'Provide More Social, Affordable and Sustainable Housing'. How much do you agree that these are the right actions to take?

Affordable_Housing_Actions - 'Provide More Social, Affordable and Sustainable Housing' Actions:

Please provide any other comments you have in relation to the 'Provide More Social, Affordable and Sustainable Housing' priority:

Please enter any comments in the box below:

Doing What Matters Most Today: 'Safer Communities'

How much do you agree that the priority 'Safer Communities' should be included in the Programme for Government?

Safer Communities_Priority - Safer Communities:

The draft Programme for Government has set out actions that we plan to take under the priority 'Safer Communities'. How much do you agree that these are the right actions to take?

Safer Communities_Actions - 'Safer Communities' Actions:

Please provide any other comments you have in relation to the 'Safer Communities' priority:

Please enter any comments in the box below:

Doing What Matters Most Today: 'Protecting Lough Neagh and the Environment'

How much do you agree that the priority 'Protecting Lough Neagh and the Environment' should be included in the Programme for Government?

LoughNeagh_Env_Priority - Protecting Lough Neagh and the Environment:
Strongly agree

The draft Programme for Government has set out actions that we plan to take under the priority 'Protecting Lough Neagh and the Environment'. How much do you agree that these are the right actions to take?

LoughNeagh_Env_Actions - 'Protecting Lough Neagh and the Environment' Actions:
Strongly agree

Please provide any other comments you have in relation to the 'Protecting Lough Neagh and the Environment' priority:

Please enter any comments in the box below:

Whilst we recognise the significance of the issues around Lough Neagh, we do not agree with the hierarchy of the title. Lough Neagh is part of the wider Northern Ireland environment and there are many significant issues that need to be addressed. The degradation of Lough Neagh highlights the negative impacts that have resulted from decades of a lack of regulation and management in our environment. This crisis is not limited to Lough Neagh but impacts but NI's freshwater and marine environment. The PfG should consider the broader water quaitly crisis in both land and sea.

Ulster Wildlife welcomes any positive actions for the environment, but we do not believe those listed in the PfG are ambitious enough. The Environmental Improvement Plan (EIP) and Climate Action Plan (CAP) are listed as achievements, but both are statutory requirements that have been published later than their deadline. The Nature Recovery Strategy remains overdue and is not referenced in the documents (but is referred to in the EIP). The PfG lacks commitment to crucial goals such as the 30x30 target to protect 30% of land and sea by 2030, as well as the integration of natural capital into policy-making, which are vital for a sustainable, resilient economy. There is a need for additional strong, measurable biodiversity targets to be enshrined in law and for actions within the Programme for Government to address biodiversity loss. The inclusion of the word 'Environment' as an afterthought to Lough Neagh suggests that broader environmental matters are not high enough on the Executive's agenda.

We would also advocate for the formation of an independent Environmental Protection Agency.

Doing What Matters Most Today: 'Reform and Transformation of Public Services'

How much do you agree that the priority 'Reform and Transformation of Public Services' should be included in the Programme for Government?

Reform_Transform_Priority - Reform and Transformation of Public Services:

Agree

The draft Programme for Government has set out actions that we plan to take under the priority 'Reform and Transformation of Public Services'. How much do you agree that these are the right actions to take?

Reform_Transform_Actions - 'Reform and Transformation of Public Services' Actions:

Agree

Please provide any other comments you have in relation to the 'Reform and Transformation of Public Services' priority:

Please enter any comments in the box below:

Agri-environment schemes are one of the major areas for environmental delivery due to the scale of land use (over 75%). These rely on public sector administration processes for their delivery. At their peak, agri-environment schemes were delivered to over 12,000 farms and covered 40% of NI land area. However, the current EFS only covers 6% and has fewer than 5,000 farms engaged. One of the major barriers to scheme delivery is the administration, which is proving costly, with up to 40% of total scheme costs in some years being attributed to scheme administration.

A radical rethink of efficiency, cultural change of innovation, and focus on technology is required to scale up delivery of agri-environment schemes. However, in parallel, the farmers that need to access these schemes require an element of direct and face-to-face support to transition to online processes, and this too has been gradually withdrawn from DAERA Direct offices. Where public services cannot meet these demands, consideration to less expensive and more effective outsourcing should be considered.

Doing What Matters Most Today: Priorities

Are there any other priorities that should be included in the Programme for Government?

Please enter any comments in the box below:

As previously indicated, the environment is bigger than Lough Neagh and should be considered as a major heading. The terms 'restoring' and 'enhancing' should also be used alongside 'protecting,' as much of our environment has already been degraded.

The creation of an independent Environmental Protection Agency should also be a priority.

Building New Foundations

How much do you agree that these are the right commitments in relation to the plans for investment in infrastructure?

Agree

Please provide any other comments you have in relation to the plans for investment in infrastructure:

Please enter any comments in the box below:

As stated in OEP's recent report on the Drivers and Pressures affecting nature in Northern Ireland, planning and development are negatively impacting our environment by increasing pollution pressure and causing habitat loss and fragmentation. The Planning System needs to be reviewed to make sure it properly protects the environment and furthermore enhances it. We'd advocate for an approach with similar ambitions to that of Biodiversity Net Gain (BNG) in England, reconsideration of what is seen as 'permitted development' as well as better and more consistent recognition of the role of Local Nature designations (SLNCl, Wildlife Sites, etc.).

All developments, but especially infrastructure projects such as those managing water (for both pollution and flooding) should embrace 'Nature-based solutions' (NbS) and incorporate green and blue infrastructure in preference to hard engineering solutions, such as the use of buffer strips along water courses, the use of trees and natural flood plains to reduce flooding impacts and incorporating habitat recovery to reduce coastal erosion. Similarly, NbS can be used to achieve net zero through the sensitive management and restoration of carbon sequestering habitats which include woodlands, peatlands, and saltmarsh among others.

Shaping a Better Tomorrow

The Executive have set out a long-term strategy to deliver three Missions, People, Planet and Prosperity, as well as a cross-cutting commitment to Peace. How much do you agree with a Missions-based approach?

Strongly agree

Please enter any comments in the box below:

We strongly agree with these strategic principles and a Missions based approach. As a nature conservation organisation, protection of our natural assets is core to our aims. We also rely on people and a healthy and prosperous society to value these habitats and to manage and enjoy their many benefits. As per previous responses, we advocate the role of Nature-based solutions (NbS) as a multi-faceted approach to creating jobs, contributing solutions to carbon emissions, pollution and flooding, whilst simultaneously delivering biodiversity gains.

How much do you agree that these are the right Missions to focus on?

Missions - People:
Strongly agree

Missions - Planet:
Strongly agree

Missions - Prosperity:
Agree

Are there any areas that are not captured under these missions?:

People Mission: A series of actions have been proposed under this Mission. How much do you agree that these are the right actions?

Agree

Is there anything else that should be included under the People Mission?:

We would like to see more emphasis on the environment in this section, particularly around green jobs and opportunities for training and upskilling in these areas. This should be of at least equal importance to the agri-food and food security ambition outlined.

We support the Making Life Better and Live Better initiatives and would advocate a leading role for nature and access to greenspace as relatively inexpensive and effective measures for physical and mental health. Where people do not have direct access to green spaces and nature, these should be created as a priority in these areas.

Planet Mission: A series of actions have been proposed under this Mission. How much do you agree that these are the right actions?

Strongly agree

Is there anything else that should be included under the Planet Mission?:

We advocate strongly for the Planet Mission and would support more Nature-based Solutions applied to deliver on the actions. A healthy, resilient natural system has an important role in providing ecosystem services which will mitigate against global climate change and biodiversity loss. We must recognise the transboundary nature of our land and sea environment, particularly our shared sea loughs and the international commitments to nature conservation.

A focus on the Biodiversity/Nature Recovery Strategy is missing from this list, which needs to be added and prioritized, in addition to 30x30 targets and enshrining nature targets in law (as carbon emissions reductions have been).

Just Transition funding and support is key, particularly for highly impacted sectors such as agriculture and fisheries. It is important to ensure agriculture and fisheries have a sustainable future and can be supported through a period of change to ensure the industries can deliver the right public goods as well as the right types of food with a low environmental footprint, taking an ecosystem approach to production.

Prosperity Mission: A series of actions have been proposed under this Mission. How much do you agree that these are the right actions?

Neither agree nor disagree

Is there anything else that should be included under the Prosperity Mission?:

There are elements of the Prosperity Mission that are relevant to the environment. The development of Nature-based solutions and green jobs in that sector will be key to addressing climate, biodiversity, and pollution challenges. Northern Ireland has a chance to lead on innovation in this sector.

We remain uncertain about the impact of growing the economy, where there is a risk of further unsustainable consumption and additional pollution. A focus on growth in the green economy is our preferred area of delivery. A healthy environment is essential for a thriving society and economy.

A commitment to Peace will underpin the three missions (People, Planet and Prosperity). A series of actions have been proposed under this commitment. How much do you agree that these are the right actions?

Strongly agree

Is there anything else that should be included under the commitment to Peace?:

Peace is framed as a cross-cutting commitment, rather than a mission. How much do you agree that this is the right structure?

Strongly agree

Please enter any comments in the box below:

Understanding Missions by Tracking Wellbeing

The draft Programme for Government outlines how it will measure progress through a Wellbeing Framework. How much do you agree with the proposed approach?

Agree

Please provide any further comments you may have in relation to your response:

Cleaner Environment and Healthier Lives can be delivered through access to green spaces and nature and the use of Nature-based solutions. However, given the importance of access to nature, we would advocate that this becomes a metric in the dashboard, or is included in 'Equal Society' and/or 'Healthier Lives'

Additional Information

Do you have any further comments relevant to this consultation?

Please enter any additional comments in the box below: