

Consultation on the 2021-22 Draft Budget

Comments by

Northern Ireland Environment Link

25th February 2021

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 63 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

Due to time constraints the comments below constitute our initial comments and as such do not represent the agreed views of Members as we were unable to give members the usual time to review and sign off this response. If you would like to discuss these comments further, we would be happy to do so.

Please note that NIEL's submission to the budget consultation also includes an attached document "Delivering a Green Recovery". This has been developed with the NIEL Membership.

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Introduction

NIEL welcomes the opportunity to respond to the 2021-22 Draft Budget consultation.

We accept that the coronavirus pandemic will be the NI Executive's main priority for 2021, both in terms of departmental focus and financial expenditure. However, we must ensure that our actions today do not further compromise our efforts to address climate change, biodiversity decline, air pollution, waste and other pressing environmental challenges that will persist long after the virus is contained.

NIEL welcomes the coronavirus funding that was provided to support NGOs in 2020. We would advocate for a dedicated fund for the environment and heritage sector in 2021 – this will be of particular importance as we begin to reopen and encourage local tourism and “staycations” to our country parks, natural and historic sites. It is clear that coronavirus has simultaneously heightened the need and desire for outdoor recreation (which has exponentially grown¹ and is likely to sustain). Due to site closures, loss of event ticket sales and other unexpected costs, those working within the eNGO sector have a reduced resource available to meet demand. Furthermore, as a result of pre-existing deficiencies in infrastructure and services, the health, recreation and tourism opportunities of our outdoor sites are not being fully exploited.

We are relieved to see that the Department for Agriculture, Environment and Rural Affairs has not received any cuts to its budget, instead receiving a 9.1% increase on the baseline position. DAERA is one of the main frontline departments for the climate and biodiversity crises and implementing post-Brexit arrangements and so should be funded appropriately.

We share the Minister's view that a one-year budget is not the most strategic way to plan for the future. We strongly feel that a multi-year budget is necessary in order to address the challenges we face as a society.

Coronavirus and the need for a Green Recovery ***(Please see further attachment on NIEL Green Recovery proposals)***

As we begin to consider how to “reopen” society, discussions have emerged on the need for a “Green Recovery”, or to “Build Back Better”. The lockdown has allowed us to reflect upon our priorities as a society and we now have an excellent opportunity to rethink how we do things. A recent LucidTalk poll² has revealed strong public support for a green recovery – 75% have appreciated access to local green spaces since lockdown began. 74% of respondents agree there should be new laws to better protect nature and over 50% of people would now vote for a political party that invests in nature-rich green spaces.

Various jurisdictions which have been affected by the coronavirus pandemic are now pledging funds towards a Green Recovery. For example, in England, a home insulation fund was established, as was a £40m fund for ‘shovel-ready’ environmental projects. In Scotland, £100m was pledged towards a Green Job Fund, £60m to help industrial and manufacturing sectors decarbonise, £70m for improved refuse collection infrastructure, £150m to deliver a 50% increase in woodland. Similar funds in Northern Ireland should be established help create opportunities for blue and green infrastructure, sustainable tourism, nature restoration, mitigate against climate change and help progress other key Executive priorities.

¹ <http://www.outdoorrecreationni.com/wp-content/uploads/2020/05/Engaging-with-the-Outdoors-during-COVID-19-Lockdown-in-NI-Report.pdf>

² <https://community.rspb.org.uk/getinvolved/b/steppingupnorthernireland/posts/new-poll-shows-strong-public-support-for-a-green-recovery>

NIEL welcomes the Department for Infrastructure's commitment to £20m for Green and Blue infrastructure in June 2020 and the £2.8m funding for greenways announced on 16th September 2020. These are steps in the right direction, however, more action and funding will be required.

NIEL and 30 other NGOs have endorsed the RSPB's "Five Point Plan for a Green Recovery"³. At the heart of our "Green Recovery" should be the recognition that the natural environment, the ecosystems it supports and the resources and services it provides, are the foundation of our social and economic well-being.

We support the following five-point plan, which will be discussed further in the RSPB response to this consultation.

1. Commitment to a Green Recovery from the Northern Ireland Executive
2. New legislation to tackle the climate and nature crises
 - a. *A Northern Ireland Climate Change Act*
 - b. *A framework of legally binding nature restoration targets*
3. Reform strategic government policy to deliver a Green Recovery
4. Deliver a Green New Deal in Northern Ireland
 - a. *Provide funding for a Green Recovery*
 - b. *Establish a Green Jobs Scheme*
 - c. *Deliver large-scale nature conservation projects*
5. Invest in nature to support healthier communities

The Climate Crisis

In June 2020, the UK Climate Change Committee⁴ recommended five clear investment priorities for building a resilient economy. If implemented locally, these investments will help tackle climate change, create jobs in the construction and energy sectors and further develop Northern Ireland's image as a "clean and green" place where people want to live and work.

The five priorities identified by the CCC were as follows:

- Low-carbon retrofits and buildings that are fit for the future
- Tree planting, peatland restoration, and green infrastructure
- Energy networks must be strengthened
- Infrastructure to make it easy for people to walk, cycle, and work remotely
- Moving towards a circular economy.

In 2009 (following the last global crisis) a HSBC evaluation⁵ of the various economic stimuli packages from around the world highlighted the benefits of tackling climate change and noted that amongst the arguments for a low carbon stimulus, "*The low-carbon economy can*

³ <https://www.nienvironmentlink.org/cmsfiles/RSPB-NI-FIVE-POINT-PLAN-FOR-A-GREEN-RECOVERY-.pdf>

⁴ <https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament>

⁵ https://www.globaldashboard.org/wp-content/uploads/2009/HSBC_Green_New_Deal.pdf

also be a job rich economy at a time of soaring unemployment, particularly through enhancing building efficiency, either via retrofit or new construction, and improving mass transit.” Tackling climate change should not therefore be viewed as a prohibitively expensive undertaking, rather, it should be viewed as an opportunity to create jobs, restore nature, reduce air pollution (and the subsequent public health cost), develop a stable, clean and home-grown energy supply, make longer term savings by mitigating against future risk (e.g. flooding) and much more.

Northern Ireland is currently the only jurisdiction within these islands without a climate change act. Over ten years has passed since the UK Climate Change Act was passed and there is still no Northern Ireland specific climate change legislation. NIEL supports the Private Members’ Bill on Climate Change which was submitted in October 2020 and would encourage the Executive to progress legislation at the earliest opportunity. NIEL is calling for ambitious, legally binding climate targets for Northern Ireland and funding to support the creation of an independent monitoring and oversight body.

NIEL welcomed the Assembly’s declaration of a climate emergency in February 2020 and the associated commitments made within “New Decade, New Approach” (NDNA) (pg44), namely:

- The Executive’s strategies to reduce carbon emissions will be reviewed in light of the Paris Climate Change Accord and the climate crisis.
- A new Energy Strategy will set ambitious targets and actions for a fair and just transition to a zero carbon society.
- The Executive should bring forward a Climate Change Act to give environmental targets a strong legal underpinning.
- The Executive will establish an Independent Environmental Protection Agency to oversee this work and ensure targets are met.
- The Economic Strategy will support clean and inclusive growth and create jobs as part of a Green New Deal.
- The Executive will create a plan to eliminate plastic pollution
- RHI will be closed down and replaced by a scheme that effectively cuts carbon emissions.

NIEL would like to see a reaffirmation from the Executive on the NDNA commitments. If the Executive cannot action these commitments in 2021 as a result of the coronavirus pandemic, we would ask that the Executive at least consider laying the foundations this year so we may progress these commitments in earnest next year – as stated within the foreword to this consultation *“this one-year budget is to act as a bridge to a multi-year budget which allows the Executive to properly reprioritise its spending, and plan for the longer-term.”* Therefore, this coming year should be used to make preparations for the implementation of the above commitments. As stated within DAERA’s recent Discussion Document on Climate Change⁶ (pg.30): *“the later [GHG emissions] cuts are made, the greater they must be to achieve the same long-term goal, and so they will be more expensive to implement”.*

⁶ <https://www.daera-ni.gov.uk/consultations/climatechangediscussion>

Restoring Nature

Restoring nature and mitigating the climate and ecological crises is essential for human prosperity, health and equity. Maintaining a healthy planet for future generations is a crucial challenge for the coming decade. We need to remain continually aware of the fact that the economy and society is embedded within the natural environment and is not external to it. Meeting demand cannot be by the continued diminution of nature (Dasgupta Review⁷). The 2019 IPBES report on biodiversity⁸ highlighted the scale of the global loss of wildlife. Nature is declining everywhere at a speed never previously seen, endangering our economy, livelihoods, food security and quality of life. The IPBES 2020 Pandemics Report⁹ advises that “*human ecological disruption and unsustainable consumption drive pandemic risk*”. Thus, we need to focus on nature conservation and restoration, climate change adaptation and ecosystem services as a human health priority as well as an environmental priority.

According to the 2019 State of Nature report¹⁰, Northern Ireland has lost more wildlife than any other part of the UK: 11% of NI species are at risk of extinction, with 12 species added to the Red List since the previous review in 2007. Furthermore, RSPB/Natural History Museum recently carried out a global assessment using the Biodiversity Intactness Index (BII), which illustrates how local ecological communities have been affected by human impacts. NI ranked as the 12th-worst performing country for biodiversity loss out of 240 countries¹¹.

At 8%, Northern Ireland has among the lowest woodland cover in Europe, where average cover is 37%. Bee species have declined by half since 1980 and even once common birds like the starling and house sparrow are in decline. According to DAERA’s Environmental Statistics report 2020¹², only 55% of ASSI biological features are in favourable condition. Just 4.5% of marine protected areas and only 13.7% of terrestrial sites were under favourable management in 2019/20. With only 9.8% of land protected for nature¹³, Northern Ireland is far below the global 30x30 goal to protect 30% of land by 2030, (currently supported in England and Scotland).

The scale of the problems facing NI’s freshwater is illustrated by the findings of the 2019 Article 17 review in relation to the freshwater pearl mussel. The fourth UK Article 17 report was submitted to the EU in August 2019, and covers the implementation period 2013-2018. The 2019 Article 17 review in Northern Ireland stated that as regards freshwater pearl mussel, “*the lack of juvenile recruitment and an ageing population will almost certainly lead to the future extinction of this species from NI, unless there is a fundamental improvement of their current habitat*”.

⁷ <https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>

⁸ <https://ipbes.net/global-assessment>

⁹ <https://ipbes.net/pandemics>

¹⁰ <https://nbn.org.uk/stateofnature2019/reports>

¹¹ <https://www.belfasttelegraph.co.uk/news/northern-ireland/ni-is-the-12th-worst-performing-country-for-biodiversity-loss-39577490.html>

¹² <https://www.daera-ni.gov.uk/publications/northern-ireland-environmental-statistics-report-2020>

¹³ <https://jncc.gov.uk/our-work/ukbi-c1-protected-areas/#indicator-description-table-c1ii-extent-and-percentage-cover-of-terrestrial-protected-areas-by-country-as-at-24-july-2020-n1-for-asssi-mcz-ncmpa-nnr-ramsar-sac-and-spa-site-designations>

For one of our most highly protected species to be at risk of extinction is a shocking prospect and an indication of a serious failure to appropriately protect and enhance our freshwater resources and meet our legal obligations – in this case those arising from the EU Habitats Directive and the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995. NIEL would argue that it is clear that freshwater protection needs to improve, significantly and as a matter of urgency.

A recent review¹⁴ by the RSPB has revealed that the NI Executive has failed to meet 83% of the commitments within the 2015-2020 Biodiversity Strategy and so urgent action is needed. NIEL would recommend the adoption of the NDNA commitment to create an independent Environmental Protection Agency at the earliest opportunity, to review the failings of the Biodiversity Strategy and provide recommendations on how to reverse this downward trend.

Furthermore, there needs to be direct, measurable actions taken to halt the pressures and drivers of nature loss and delivery of commitments to the Aichi Targets, as stated in the NI Biodiversity Strategy¹⁵, by:

- Implementing species action plans for all threatened species
- Effective protection and management of at least 30% of land and seas for nature and people by 2030
- Restoring and reconnecting defined areas of lost and fragmented habitats to specific standards
- Phasing out harmful subsidies and introducing systems for payments for environmental public benefits by a fixed date, ensuring that agriculture and fisheries work with and not against nature
- Taking action to control harmful invasive, non-native species, implementing international best-practice to reduce their spread
- Taking action to tackle pollution, such as reduction and phase out goals for harmful pesticides
- Ensuring that nature-based solutions for climate also deliver for nature by agreeing core standards for the certification and measurement of nature-based solutions.

Infrastructure fit for the future

An Infrastructure Commission for NI

NIEL supports the development of an independent Infrastructure Commission for NI to take strategic decisions. Following the recommendations from the Expert Panel brought together by the Infrastructure Minister¹⁶, the Infrastructure Commission should:

- Set a long term (30+ years) vision for NI
- Be independent of Government and hold Government to account
- Be adequately resourced
- Advise on all aspects of NI infrastructure
- Include a focus on climate change
- Engage with stakeholders and the public

NIEL would like to see this commission adequately funded and in place by 2022 at the latest.

¹⁴ <https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/rspb-ni-northern-ireland-biodiversity-strategy-failing-after-years-of-inaction>

¹⁵ <https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0>

¹⁶ <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/mapi-final-report-13oct20.pdf>

Road Infrastructure

According to the Department for Infrastructure's 2018 Travel Survey just 5% of all journeys in NI are made by public transport. More than 70% of all journeys in NI are by car and many of these are single occupant journeys. During "rush hour", as much as one fifth of all journeys are parents doing the school run, despite the fact that most primary school children live within one mile of their school.

Transport spending in NI is disproportionately higher for roads than all other forms of travel and this has enabled the car to dominate our transport. According to the National Audit Office¹⁷, in 2017-18, 59% of the NI transport budget was spent on roads with 18% spent on railways, 11% on local public transport and 12% on other transport. The situation in England was almost the complete reverse of that in NI, with 31% of the transport budget spent on roads, 59% on railways and 8% on local public transport. In Scotland 42% of the transport budget was spent on roads and 47% on public transport (39% on railways and 8% on local public transport). In Wales 45% of the transport budget was spent on roads and 51% on public transport (46% on railways and 5% on local public transport).

NIEL believes we need to focus on moving people, not vehicles around our towns, cities and rural places. NIEL would like to see a significant shift in spending so that so that the overall transport spend has at least a 50/50 split between roads and public transport, similar to the spending pattern in other UK administrations. The promotion of public transport and active travel is also crucial to delivering sustainable, low carbon solutions for connected infrastructure across Northern Ireland and can create significant economic, social and environmental benefits, and should receive greater support from the NI Executive.

We are pleased to see that £7.4m has been allocated to Belfast Rapid Transit Phase 2 and that £25m is anticipated for Low Carbon Emission Public Transport. In addition, we would welcome measures to encourage uptake of public transport – this is of particular importance given the drop in passengers as the result of coronavirus.

Digital Infrastructure

NIEL welcomes the announcement of "Broadband Project Stratum", a £165 million project that will bring gigabit-cable broadband infrastructure to over 76,000 premises across Northern Ireland.

NIEL would advocate for improvements to the telecommunications network as it can enable remote working/study from home – an arrangement which became a proven necessity over the last 12 months due to coronavirus lockdown. Many people are unable to travel to their place of work and have had to rely on their personal broadband connection – this has presented difficulties for those living in rural areas.

Longer term, an improved telecommunications network will have a positive knock-on effect for transport emissions as fewer people will be required to travel to and from their place of work. Furthermore, improved ICT infrastructure could create more opportunities for business, online/distance learning, as well as facilitate low-carbon networking via conference calls, webinars etc which negate the requirement for people to be "physically present" at events or meetings.

¹⁷ <https://www.nao.org.uk/wp-content/uploads/2019/02/Investigation-into-devolved-funding.pdf>

Energy Infrastructure

One of the most important priorities for Northern Ireland this decade is to reduce our total energy consumption. The importance of energy efficiency was clearly highlighted by the former Department of Enterprise, Trade and Investment, which stated¹⁸: *“Reducing overall energy demand offers the potential for the most social, environmental and economic gains”* and, *“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.”*

Northern Ireland has made excellent progress in developing its renewable energy source. The annual proportion of electricity consumption from renewable sources in Northern Ireland has risen considerably in recent years, from 9.7% in 2009 to 43.7% in 2019¹⁹. Increasing the capacity of the electricity grid will be crucial in the coming years as we further expand our renewable energy portfolio. Our energy – electricity, heating and transport – should be sourced from renewables as much as possible and it is the heating and transport sectors that really need to be improved.

According to the National Infrastructure Committee “Smart Power” report²⁰ (principally built around three innovations, “Interconnection”, “Storage”, and “Demand Flexibility”) could save consumers up to £8 billion a year by 2030, help the UK meet its 2050 carbon targets, and secure the UK’s energy supply for generations.

Research by the National Grid²¹ found that the UK will need to recruit over 400,000 jobs to build the net zero energy workforce and reach net zero by 2050, of which 13,700 jobs will be needed in Northern Ireland. According to the Department for the Economy, the low carbon and renewable energy (LCRE) economy in NI generated £2bn in 2017 (£1.2bn directly and £800m indirectly) and approximately 11,700 FTE jobs (with an even 50/50 split between direct and indirect jobs). Therefore, based on the research by the National Grid referred to above, it is clear that investing in a green, low-carbon recovery offers NI the possibility to more than double the number of jobs in the LCRE sector. NIEL believes this is an opportunity that must be taken.

We recommend that:

- There must be a presumption against all new fossil fuel infrastructure. There is no room in our carbon budget for more fossil fuels
- We should increase the capacity of the electricity grid to allow for new connections to renewable sources
- There should be investment in energy storage which will allow for “smarter” electricity generation, where surplus energy can be stored for future use or export
- There should be investment in a Green New Deal programme of public works to improve the energy efficiency of the housing stock and the public sector estate
- The statutory duty to promote natural gas from the Energy (Northern Ireland) Order 2003, and the Strategic Energy Framework 2010 should be removed
- There should be an immediate ban on all commercial fossil fuel extraction. No new licences for fossil fuel exploration should be issued, and all extant licences should be revoked

¹⁸ DETI “Delivering Northern Ireland’s 1% Energy Efficiency Target An Overview”

¹⁹ <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Energy-In-Northern-Ireland-2020.pdf>

²⁰ <https://www.gov.uk/government/publications/smart-power-a-national-infrastructure-commission-report>

²¹ <https://www.nationalgrid.com/document/126256/download>

- Building Regulations should be amended to require the highest level of energy efficiency in all new builds
- All public sector pension schemes should divest from fossil fuels

Waste Infrastructure

Whilst it is encouraging that the volume of waste sent to landfill has decreased year-on-year, we are not doing enough to tackle problem plastics and our culture of “take-make-use-dispose”.

We propose:

- The establishment of a Deposit Return Scheme for Northern Ireland which targets the most frequently littered drinks containers – aluminium cans and plastic bottles
- Bans on the manufacture and sale of material which cannot be recycled e.g. polystyrene.
- Grants to support research into waste prevention, plastic alternatives including biodegradable or compostable plastics such as corn starch plastics, environmentally-friendly packaging and behaviour change.
- A 5p increase in the Carrier Bag Levy (to 10p) and the introduction of levies on other frequently littered items beyond the scope of a Deposit Return Scheme e.g. single-use coffee cups – whilst these levies are primarily to be used as a deterrent to waste, the monies raised should be used to support environmental improvement.
- Support for Green Key9 as an Eco-Tourism/Eco-Hotel programme to compliment the other “Eco” programmes within the Waste Prevention Programme
- Support to local councils to achieve standardisation of recycling across all council areas (based on the broadest collection regime possible)

Water Infrastructure

The delivery of clean and safe water to NI households and businesses is one of the most important functions of NI Water and should be resourced appropriately. NIEL believes that our water infrastructure is in dire need of investment – to address the threat posed by climate change, to meet rising demand whilst ensuring that water is obtained efficiently, sustainably and with minimal impact upon our freshwater environment.

NIEL calls for the appropriate resourcing and full implementation of the Long Term Water Strategy, including improvements to drinking water supply and demand, flood risk management and drainage, environmental protection and improvement, and water and sewerage services.

By progressing the sustainable water management agenda, we can protect our environment, conserve water and provide significant cost-savings to the public purse. Investment in natural solutions (e.g. SuDs, Integrated Constructed Wetlands) as well as renewable energy and grey-water systems will offer considerable savings in the long-term.

NI Water has stated that it requires investment of £2.5bn²² over the PC21 business plan period. As yet, “*a solution has not been identified*” to fund this vital investment. Whilst efficiencies and creativity may offer some relief to budgetary pressures, serious

²² <https://www.niwater.com/ourstrategy.aspx>

consideration should be given to the introduction of metered water charges for domestic properties (as in the rest of the UK) as a means to raise revenue.

Conclusion

Our society is facing climate and biodiversity crises. It is essential that the NI budget reflects this situation, and adequate resourcing is provided to DAERA as the lead Department.

The NI Government is also currently progressing an outcomes-based Programme for Government. We strongly feel that this is the right approach, but in order for this to be successful we need a fundamental review of the budgeting process. In particular, we need multi-annual and cross departmental budgeting.

Finally, NIEL would like to see greater use of options that link to multiple PfG outcomes thereby offering cross sectoral and cross departmental benefits such as health benefits. For example, research²³ which looked at the entire population of England below retirement age between 2001-05 (40,813,236 people) found that populations that are exposed to the greenest environments also have lowest levels of health inequality related to income deprivation, concluding: "*The implications of the study are clear: environments which promote good health may be key in the fight to reduce health inequalities.*"

²³ [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(08\)61689-X/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(08)61689-X/fulltext)