

Consultation on the Draft Regeneration and Housing Bill

Comments by

Northern Ireland Environment Link

22 April 2010

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 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.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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Introduction

We welcome the consultation process and commend the effort to involve stakeholders in the proactive development of policy work to ensure the many benefits that involvement of and input from stakeholders can achieve. The process takes time, but when done in a true spirit of collaboration saves time in the long-term by identifying and addressing concerns of citizens, non-governmental organisations and other government departments and agencies at an early stage.

Northern Ireland Environment Link publishes its Policy Priorities annually in our document titled *The Way Ahead*. This consultation relates to all four of the main themes within that report; climate change, sustainable development, environmental protection and planning. We welcome the proposals contained within the Bill and feel that it offers great opportunities for the new councils to improve the lives of their citizens.

Integration with Community Planning and Power of Well-Being. Responsibility for these powers at a local level allows for improved local governance and decision making involving those whose lives the decisions affect. The ability to integrate the delivery of the powers in this Bill with the powers of Well-Being and Community Planning, which are also being enacted for the new councils, is significant.

Integration across Councils. Ensuring full integration of policy across Northern Ireland is however also very important; people should not be disadvantaged through living in one council area rather than another on some of the major aspects of this Bill. This is particularly important with regard to dealing with the energy efficiency of homes as well as the unfitness of homes.

Involvement of Voluntary and Community Groups. Working with the voluntary and community sector will give improved outcomes within a number of areas of the powers to be devolved, including both the practical delivery of programmes (for example energy efficiency programmes) and working with such groups to develop consensus around proposals (e.g. for proposed schemes). Powers to fund NGOs to deliver work on behalf of the council is therefore vital (pt 10) but so is promoting the understanding within councils on why, and how, working with NGOs is of significant benefit to the council, delivering stronger and more supported economic, social and environmental outcomes.

Public Rights of Way (PROW). Devolving the power to extinguish public rights of way must be accompanied by proper controls and mechanisms to ensure that it only takes place when this is truly in the public interest and when local people have been given the opportunity to express their views. PROW are valued by the public and should not be extinguished lightly. The possibility that they could be extinguished for private gain must be excluded through full disclosure and dissemination about any proposed scheme.

Advertisement and Consultation on Schemes. This is essential if schemes are to be understood and supported by the public. Mechanisms should be standard throughout Northern Ireland.

Capacity Building for Planning Functions. Transfer of planning powers is an area that is raising concern amongst NGOs and the public. The fact that considerable additional

powers will be devolved to new authorities that are learning their new roles, but now have the power to make decisions that will impact on Northern Ireland for decades to come, causes concern. Capacity building for all those to be involved in the planning process is required, and should begin as soon as practical to ensure that the skills and understanding of all relevant issues are in place within both council officers and councillors. Ensuring that the community has strong roles in the process, for example through the Pre-Application Consultation, is an essential element if the public is to have confidence that their concerns will be taken into account.

Energy Efficiency in Housing. We very much support these proposed powers and see it as providing a welcome additional driver to address the issue of fuel poverty and inefficient and expensive use of energy. Schemes should be developed and copied throughout Northern Ireland to ensure that we do not develop a spatially unfair system. Mechanisms need to be in place to ensure that funding for this important work is not diverted to other areas, or if it must be that there is proper and full public consultation and agreement of the proposals. There is significant opportunity for involving NGOs in delivery and promotion aspects of this work, ensuring both full local support and understanding and delivering the work in an economically efficient manner.