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## FROM THE PRESIDENT

14<sup>th</sup> February 2011

Dear Mr Duffy

### **DRAFT BUDGET 2011-2015 CONSULTATION ON DRAFT SPENDING AND SAVINGS PROPOSALS – DEPARTMENT OF THE ENVIRONMENT**

Thank you for the opportunity to comment on the above. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,000 farming families:

The Ulster Farmers' Union recognises the need to manage the main expenditure pressures as outlined in the consultation document however this must be carried out in a manner which has the least impact on front-line services. The Union recognises that the Department of the Environment (DOE) need to save an estimated £15.4 million annually across the Department however we have some concerns regarding the proposed areas for making these savings. It should be noted that it is difficult to comment on the proposals given the lack of detailed information within the consultation document. Given the limited information available, the UFU would make the following comments on the proposed savings plans:

#### **Review of Planning Service Operating Costs**

The UFU would welcome a review of operating charges which will hopefully highlight savings through rationalisation and reorganisation. However the UFU would wish to see more detail on these proposals.

#### **Planning Fees Review**

The Ulster Farmers' Union has already outlined views on this issue in our response to the November 2010 Planning Service consultation "*Planning Fees in Northern Ireland: Proposals for Change*". In this response the UFU outlined that full cost recovery should be achieved without the need to raise planning fees. The UFU proposed greater emphasis on efficiency savings and more efficient process management and felt there was a significant

amount that could be saved within the current planning system. The UFU have also suggested that Planning Service should consider how certain planning fees are structured. The UFU are concerned that the proposed new £10,000 fee for Planning Service to consider certain Environmental Impact Assessments (EIAs) could disadvantage many businesses hoping to expand. Most of what is proposed as part of an EIA is a duplication of work already completed by other parts of the Department e.g. PPC Regulations.

### **Environmental Policy and Northern Ireland Environment Agency (NIEA)**

The UFU would welcome proposals to rationalise the delivery of the DOE legislative programme however would like to see more detail on this particular issue and the impact this could have. It is vital that despite rationalisation, the DOE ensure that they meet requirements from the European Commission in relation to the transposition of legislation from Brussels and avoid infraction proceedings. The UFU also do not wish to see rushed transposition of legislation in order to meet EC requirements without full and proper consultation and consideration with the industry.

There are also some concerns around the reduction in the NIEA's events programme which seeks to raise awareness of environmental issues. Awareness raising is an important aspect of environmental protection and the UFU believes has a more positive impact than the 'stick' approach. Again more detail on the proposed savings plans in this area would need to be considered to allow a more accurate assessment on the potential impact of this proposal.

### **Natural Heritage Programmes**

The UFU welcomes the slowdown in the rate of declaration of Areas of Special Scientific Interest (ASSIs). The Union feels that there has been a rushed approach to ASSI declaration in recent times and often without full and proper consultation with landowners. The designations can have a significant impact on agricultural practices and are often restrictive.

### **Environmental Protection Programmes**

The UFU has some concerns around the likely increase in the time taken to process waste management licences and to carry out the necessary inspections to support other forms of applications across government bodies as a consequence of workforce reductions. Delays in processing applications etc could have a detrimental impact on local business and farms which are trying to progress and expand and ultimately this could impact on the economic recovery. DOE/NIEA must consider implementing more effective licensing systems that will reduce costs but continue to deliver a satisfactory service to customers. Unnecessary bureaucracy must also be removed from the system. The UFU would also suggest that where a permit/licence is due for renewal, DOE/NIEA ensure that there are procedures in place e.g. cover letter, to ensure the site/business can continue to operate as under licence until the renewal application is processed to ensure a business/farm is not left unlicensed in the interim period.

### **Road Safety and Vehicle Regulation**

In general the UFU would support the reduction in recruitment of DVA's enforcement officers as it is felt that they currently duplicate a lot of the work carried out by the PSNI.

### **Flytipping**

While the UFU recognises that action on this issue is only being postponed at this stage and understands the reasons for this approach, it is unfortunate that any work that will clarify responsibilities in relation to flytipping is being postponed.

**Other Points**

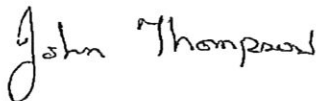
While not specifically outlined in the consultation document, the UFU opposes any increase in the various fees/licence fees charged by NIEA. The UFU rejects the proposition that those who are subjected to regulation in the public interest should pay for the scheme administration through charges and are opposed to the cost recovery policy.

The Ulster Farmers' Union also has concerns that staff reductions could ultimately result in significant delays to farmers' Single Farm Payments for those farmers who are selected to be inspected by the NIEA under the cross-compliance regime. The Single Farm Payment is a vital source of income on many farms and any delays to NIEA inspection procedures could have a significant financial impact on farm families selected for these inspections. It is vital that NIEA improve the current timelines and re-consider how to deliver this regulatory programme in order to avoid duplication, improve efficiencies and reduce costs.

The UFU would suggest that the DOE/NIEA Better Regulation Teams continue to deliver on ways to deliver efficiency and therefore cost savings within the Department. It is vital that they continue to work with the industry on this area and implement any better regulation proposals with potential efficiency savings as quickly as possible.

I trust that the above comments are of use to you, should you wish to discuss further please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink that reads "John Thompson". The signature is written in a cursive style with a large initial 'J'.

**JOHN THOMPSON**