

## Public Consultation – New Programmes 2014-2020

The content of the Cooperation Programmes (CPs) for PEACE and INTERREG has been informed by the first public consultation exercise which took place in late 2012. The Consultation Information Document for both programmes, which includes a summary of the CPs can be found on the SEUPB website at <http://is.gd/zXxN9x>. The following questions reflect those contained within that document.

The views collated within this, the second and final phase of the public consultation for the new programming period (2014-2020), will inform the final drafting of the CPs. These will then be submitted to the Northern Ireland Executive, the Irish Government and the Scottish Government (INTERREG only) for approval before being submitted by 22 September 2014 to the European Commission (EC) for negotiation and final approval. The SEUPB is also currently developing result and output indicators to be incorporated into the final CPs. The EC has indicated that the negotiation phase will last up to 6 months. It is anticipated that the programmes will be approved in the first quarter of 2015, with funding calls for applications opening in late spring.

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5. Are you responding as an individual or does this response represent the views of an organisation?

Individual

**Organisation**

6. If you are representing an organisation, please provide its full name.

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7. What is your role in this organisation?

COMET INTERREG Programme Manager

8. Are you interested in the new PEACE Programme, the INTERREG Programme, or both?

PEACE

INTERREG

**Both**

## Content of the Draft Cooperation Programme for INTERREG – Research & Innovation

The economies of the region have a low proportion of high value added sectors and low levels of Research and Innovation (R&I). The three regions working together have the critical mass to pursue R&I of the scale and quality necessary to achieve impact.

Support will be provided to the region to help create world-class centres of Research and Innovation within two specific business sectors, namely 'Health & Life Sciences' and 'Renewable Energy'. Evidence collected during the development of the Cooperation Programme indicates that investment within these specific sectors offers the highest possibility for future competitive growth.

Specific Objective: To increase cross-border research and innovation in two target sectors: 'Health & Life Sciences' and 'Renewable Energy'.

Actions to be supported:

- The creation of 'centres' of research competence (and associated research programmes) within the fields of 'Health & Life Sciences' and Renewable Energy.
- Target research areas to include: medical engineering related to health; personalised medicine; experimental medicine; mass energy storage; wave and tidal energy; and energy production.
- A 'centre' may be dispersed over a number of geographical locations, where participating institutions follow an agreed integrated research programme.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

9. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strongly agree       Agree       Neither agree nor disagree       **Disagree**       Strongly disagree

10. Do you think that the indicative €45m allocated budget for this objective is appropriate?

Strongly agree       Agree       Neither agree nor disagree       **Disagree**       Strongly disagree

11. Please provide any additional comments you may have on this R&I objective for the Programme.

Projects should be developed with input from Local Authorities to ensure complementarity with local and regional initiatives.

It is perceived that the projects most likely to meet the requirements of the specific objectives, especially under the 'Health' theme, would be predominantly central government led. It is difficult to envisage how a group of local authorities working on a cross-border basis could take forward projects.

COMET welcomes the inclusion of renewable energy which is an identified need and would benefit the whole region and assist growth.

COMET is concerned that the scope of this theme is restrictive in only providing support to two specific sectors. There may be other growth sectors that require support that are currently excluded and we would suggest that the theme be broadened to allow wider opportunity.

## Content of the Draft Co-operation Programme for INTERREG – Research & Innovation

In addition it remains unclear how the theme will link in and not duplicate ERDF and Horizon 2020 programmes.

The INTERREG V themes should clearly demonstrate how they are additional to the provision which already exists in Ireland both North and South and more importantly how they contribute to cross border economic development. There is a danger in this theme that INTERREG monies are used to fund what should be mainstream Government department activities.

SMEs characterised by low levels of innovation activity and low levels of R&I expenditure constitute a large proportion of businesses in Northern Ireland, the Border Region of Ireland and parts of Western Scotland. Cross-border co-operation presents opportunities to foster partnerships between SMEs and relevant research institutions, drawing upon the different research strengths across the programme area.

Support will be provided to various initiatives which target SMEs categorised as being 'innovation inactive'. Support will also be given to programmes designed to enhance the exporting capabilities of the region.

Specific Objective: To increase the number of SMEs engaged in cross-border research and innovation activity.

Actions to be supported:

- An education and awareness building programme;
- Innovation capability audits within SMEs;
- Innovation action plans tailored to the specific needs of the SME which address innovation capability deficiencies;
- An innovation internship programme;
- A collaborative research and development programme designed to create and support collaborative R&I projects between SMEs and research institutions.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

12. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strongly agree      **X**  **Agree**       Neither agree nor disagree       Disagree       Strongly disagree

13. Do you think that the indicative €15m allocated budget for this objective is appropriate?

Strongly agree       Agree      **X**  **Neither agree nor disagree**       Disagree       Strongly disagree

14. Please provide any additional comments you may have on the R&I objective for the Programme.

Projects should be developed with input from Local Authorities to ensure complementarity with local and regional initiatives.

COMET supports the focus of the Research & Innovation Objective and the importance of opportunities for SMEs working in partnership with local universities.

Currently not enough SMEs avail of Research and Innovation and there will be even less doing so thereby there will be a negative impact on the opportunity to create or grow more innovative SMEs. It is unclear how individual micro businesses or SME's will be able to avail of this funding and how it is differentiated from the planned R&I theme under ERDF and Horizon 2020 programmes.

Research and Innovation are needed, however, COMET would be concerned about the additionality of the programmes proposed under this theme. There are a number of mainstream funding programmes targeted at encouraging linkages with business and research institutes and the concern is that this money will be used by government

departments or agencies, to finance programmes that are already well established.

## Content of the Draft Cooperation Programme for INTERREG – Environment (Habitat, Species & Marine)

The three jurisdictions share habitats and marine resources. Cross-border collaboration is essential in order to adequately address the requirements of the 'Biodiversity Directive' and the 'Marine Strategy Framework'. The programme will facilitate the development of common approaches to the management of the environment in order to contribute towards the successful delivery of the EU 'Atlantic Strategy and Action Plan.'

Support will be provided to create a more resource efficient and sustainable economy. In order to achieve this, the CP will provide assistance to various collaborative cross-border programmes which can protect the integrity of the region's biodiversity and also improve its marine environment.

Specific Objective: The recovery of habitat and species of EU concern within protected areas that are contiguous to the border.

Specific Objective: To promote effective cross-border cooperation to ensure high quality transitional, coastal waters and marine waters.

Actions to be supported:

- Development and implementation of management plans for cross-border sites;
- Research into species and habitats including the impact of climate change;
- Management conservation and protection activities, to include breeding programmes;
- Land management activities, including the creation and/or restoration of physical environments;
- Removal of invasive species;
- Development and implementation of cross-border marine management plans;
- Mapping of marine/seabed environment;
- Creation of a regional cross-border marine centre;
- Creation of a network of marine protected areas;
- Research and development in the marine environment, including the impact of climate change;
- Marine skills development initiatives;
- Co-ordinated research programme of direct relevance to the management challenges of the eligible area.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

15. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

- Strongly agree       Agree       Neither agree nor disagree       **Disagree**       Strongly disagree

16. Do you think that the indicative €22m allocated budget for this Environment objective is appropriate?

- Strongly agree       Agree       Neither agree nor disagree       **Disagree**       Strongly disagree

17. Please provide any additional comments you may have on this Environment objective for the Programme.

Projects should be developed with input from Local Authorities to ensure complementarity with local and regional initiatives.

It would appear that the projects most likely to meet the requirements of the specific objectives would be predominantly central Government led. Therefore whilst it is difficult to argue against any of the investment priorities identified, we would strongly suggest that

## Content of the Draft Cooperation Programme for INTERREG – Environment (Water Quality)

there is no evidence of these funds being used to provide 'additionality'.

Why is there a requirement for some of the objectives involved to be contiguous to the border? We would recommend that all investment priorities chosen would ensure that a regional wide impact is prioritised, as recovery of habitat and species of EU concern within protected areas applies to all parts of the region.



## Content of the Draft Cooperation Programme for INTERREG – Environment (Water Quality)

The region shares three international river basins with several major river systems flowing across the border. Cross-border collaboration is essential to adequately address the requirements of the 'Water Framework Directive'.

Support will be provided for investment in cross-border shared solutions to the achievement of EU water quality standards and the joint management of water bodies that straddle the border. This will result in long-term impacts on the quality of water in the region beyond the life-time of the Programmes.

Specific Objective: To improve water quality in cross-border river catchment areas and shared transitional and coastal waters

Actions to be supported:

- The development and implementation of integrated river basin management plans and actions;
- The development and implementation of management plans for designated drinking water protected areas;
- River habitat restoration schemes;
- Water management research;
- Research and development in wastewater treatment technologies, including the use of green technologies, with direct relevance to the catchment area;
- Creation of demonstration sites to illustrate best practice wastewater treatment methodologies;
- Sewerage network and wastewater treatment projects that impact on a cross-jurisdictional basis on the catchment areas, transitional and shared coastal waters.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

18. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strongly agree       Agree       Neither agree nor disagree       **Disagree**       Strongly disagree

19. Do you think that the indicative €50m allocated budget for this objective is appropriate?

Strongly agree       Agree       Neither agree nor disagree       **Disagree**       Strongly disagree

20. Please provide any additional comments you may have on this Environment objective for the Programme.

Projects should be developed with input from Local Authorities to ensure complementarity with local and regional initiatives.

Whilst we recognise that NI is not currently meeting EU targets in respect of water quality in the region, we do not believe that INTERREG funds should be used to fund core actions which central Government should be delivering.

## Content of the Draft Cooperation Programme for INTERREG - Health

The health services across the region face challenges in meeting rising demand within a constrained budget environment. Cross-border cooperation can contribute to the more efficient delivery of health services in the border region, particularly with regard to the co-ordination of services. Co-ordination and sharing of e-health solutions can fast-track implementation of technology and services to improve healthcare.

Support will be provided to reduce health inequalities across the eligible area and contribute towards the move from institutional to community-based healthcare provision. The proposed CP also provides clear scope for the creation of cross-border healthcare trails to be used in the development of potentially life-saving health treatments and services.

Specific Objective: To improve access to quality cross-border healthcare services.

Actions to be supported:

- Creation of new cross-border treatment clinics within individual disease areas such as diabetes, dermatology, cancer, mental health and orthopaedics. These clinics will generally be service-based rather than physical infrastructure;
- Creation of service-based, rather than physical infrastructure cross-border community pharmacies;
- The development of cross-border e-health solutions within the clinical environment, aimed at increasing remote healthcare provision;
- The application of e-health solutions to cross-border healthcare provision;
- Creation of cross-border healthcare ecosystems incorporating SMEs, academic institutions and the healthcare sector;
- Creation of cross-border healthcare trial networks;
- Delivery of cross-border healthcare intervention trials.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

21. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

- Strongly agree       Agree       **Neither agree nor disagree**       Disagree       Strongly disagree

22. Do you think that the indicative €53m allocated budget for this objective is appropriate?

- Strongly agree       **Neither agree nor disagree**       Disagree       Strongly disagree  
 Agree

23. Please provide any additional comments you may have on the Health objective for the Programme.

We welcome this priority which aims to improve access to cross-border health care services; however, there is no recognition of the role of local authorities to promote health and wellbeing as part of their community planning functions.

Social Health Projects e.g. mental health and wellbeing projects should also be eligible for support under the strategic theme.

It is imperative that central Government policies, EU Programmes and local community plans are aligned so that funding can be maximised not duplicated.

Projects should be developed with input from Local Authorities ensuring complementarity with local and regional initiatives.



## Content of the Draft Cooperation Programme for INTERREG – Sustainable Transport

Transport is crucial to the economy providing businesses with links to their customers and markets as well as providing individuals with access to employment and services such as education, health and leisure. However, the transport sector is also one of the largest contributors to green-house gas and carbon emissions. It is important to develop a more efficient, sustainable and environmentally friendly transport network across the eligible area.

Support will be provided for the development of environmentally friendly and low carbon transport systems, in order to promote sustainable cross-border, regional and local mobility.

Specific Objective: To improve the environmentally friendly transport infrastructure in the region to promote the utilisation of low carbon transportation.

Actions to be supported:

- Development of a comprehensive cross-border cycle network;
- Development of multi-modal transport hubs to facilitate low carbon transportation in the cross-border region;
- Development of the existing cross-border infrastructure for electric vehicles including ensuring interoperability;
- Actions to facilitate the increased use of electric vehicles by public agencies, including subsidies for purchase of vehicles.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

24. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strongly agree       Agree       Neither agree nor disagree       Disagree       Strongly disagree

25. Do you think that the indicative €40m allocated budget for this objective is appropriate?

Strongly agree       Agree       Neither agree nor disagree       Disagree       Strongly disagree

26. Please provide any additional comments you may have on the Sustainable Transport objective for the Programme.

Here again this priority for investment in e-car technology is one for central Government and at this time the infrastructure already in place is very under used as there are insufficient electric cars on the road. The numbers will remain very low until the technology exists to improve the driving range achievable by e-cars – as only then will the public be interested in this type of vehicle.

We welcome the inclusion of transport via inland waterways and maritime transport as well as the development of cross border cycle networks as detailed in Thematic Objective 7, Priority Axis 3, however, in the specific objectives outlined above only cycle networks are detailed, so we strongly recommend that the whole part be included not just part.

Projects should be developed in collaboration with Local Authorities to ensure complementarity with local and regional initiatives.

27. Please provide any other comments you may have, including the selection of themes

COMET welcomes Belfast City now being fully eligible within the INTERREG V Programme, however, the draft programme demonstrates little opportunity for local organisations to be able to apply for projects. In addition there is no opportunity for continued partnership support to a wide range of cross border stakeholders and also there will be a loss of many years of expertise in delivery and governance which is essential for the success of the new Programme.

We are extremely surprised and disappointed to note that since the last consultation exercise, the investment priority allowing for regeneration of urban and rural environments has been removed – especially as SEUPB had previously made it clear that it would be under this specific investment priority, where they envisaged local government to play a ‘key role’. With this now removed, there is almost no opportunity for local government to be involved in INTERREG V.

We would request that the entire Thematic Objective 9: Social Inclusion and Combating Poverty – support for economic regeneration of deprived urban and rural communities, resulting in improved economic, physical and cultural environment is included so that those most socially excluded, suffering from poverty and discrimination, can benefit through targeted local and regional actions.

Once again we would strongly suggest there is little evidence of these European funds being used to provide ‘additionality’ over and above what Government departments’ priorities are and where they should already be investing in particularly around EU directives.

## Content of the Draft Cooperation Programme for PEACE – Shared Education

Shared education is defined as 'involving two or more schools from different sectors working in collaboration with the aim of delivering educational benefits to learners promoting the efficient and effective use of resources and promoting equality of opportunity, good relations, equality of identity, respect for diversity and community cohesion'. A key attribute of all shared education activities will be the ongoing and sustained sharing of classes, subjects, sports and extra-curricular activities.

Support will be provided to increase the extent and quality of cross-community and cross-border contact, through the provision of various shared education initiatives. In doing so, it will encourage greater levels of tolerance and understanding amongst young people and contribute to improved educational outcomes.

Specific Objective: To create a more cohesive society through sustained and positive contact between school children from all backgrounds.

Actions to be supported:

- Joint development and planning of shared education initiatives;
- Joint delivery of the curriculum;
- Courses designed to increase good relations and respect for diversity among pupils, parents, and governors;
- Training and professional development courses designed to provide teachers with the necessary skills for curriculum planning and the delivery of lessons in relation to shared education.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

28. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strongly agree       Agree       **Neither agree nor disagree**       Disagree       Strongly disagree

29. Do you think that the indicative €45m allocated budget for this objective is appropriate?

Strongly agree       Agree       **Neither agree nor disagree**       Disagree       Strongly disagree

30. Please provide any additional comments you may have on the Shared Education objective for the Programme.

There is a need to ensure recognition of the central role of the new Belfast Local Authority as civic leader and the requirements of the Community Planning function. The relevant educational bodies implementing this Objective must align their work with the emerging community planning processes in the Belfast area and that Belfast Council is actively engaged in the development of new programmes. Council is currently a key member of a number of Partnerships such as the Belfast Outcomes Group for Children & Young People, the Belfast Strategic Partnership (Learning Charter) along with the education sector. There is significant potential to develop this Objective through development of effective governance structures for Children & Young People as part of the Community Planning Process.

## Content of the Draft Cooperation Programme for PEACE – Children and Young People

The first consultation identified the need to engage and inspire young people across the region. The socio-economic analysis and the government departments in both jurisdictions also highlighted the significant number of young people not in employment, education or training (NEETS).

Support will be provided to equip young people, specifically NEETS, with the tools necessary to improve their employability prospects. It will enhance general youth work provision, alongside that of other statutory youth support providers, across the region. The objective will also support cross-community activities to help reduce anti-social and sectarian or racially-based behaviour. These actions will contribute towards the implementation of the 'United Youth Programme' which is part of the 'Together Building a United Community' strategy.

Specific Objective: To equip young people with the necessary skills and attitudes to contribute towards a more cohesive society.

Actions to be supported:

- Joint development and planning of youth work initiatives;
- Shared youth programmes focused on extracurricular activities;
- Cross-community and inter-cultural courses designed to increase good relations and respect for diversity among young people;
- Shared residential training programmes for young people, particularly those living adjacent to interface areas;
- Peer mentoring initiatives;
- Youth leadership development initiatives;
- Cross-border professional development programmes;
- Training courses (including European placements) for NEETs to improve their employability.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

31. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

- Strongly agree       Agree       **Neither agree nor disagree**       Disagree       Strongly disagree

32. Do you think that the indicative €50m (€20m of which will be delivered via local authority-led Peace Action Plans) allocated budget for this objective is appropriate?

- Strongly agree       Agree       **Neither agree nor disagree**       Disagree       Strongly disagree

33. Please provide any additional comments you may have on the Children and Young People objective for the Programme.

Children and Young People is one of the Council's corporate priorities and SEUPB are asked to note that Council has developed a Children & Young People Framework for the achievement of two strategic outcomes for the city:

- Children and young people are developed into aspiring, assertive, empowered, enterprising and active citizens and;
- Children and young people equally feel part of a Belfast that is a safe, prosperous and enjoyable place to play, study, work, live and visit.

Core activities in support of this framework include ongoing engagement and assessment ; provision of a universal programme of activities, opportunities and events; co-ordinated and

## Content of the Draft Cooperation Programme for PEACE – Children and Young People

collaborative targeted interventions in dedicated thematic areas such as good relations, health equity, physical activity etc; maintaining accessible assets for children and young people and collaborative commissioning and programming of resources.

Council will continue to identify opportunities for developing the city's young people in partnership with local communities, statutory bodies, the private sector and other key stakeholders. For example Council has developed 12 community centre based IT hubs which provide an opportunity to support Young people in the NEET category within their local communities to develop skills and enhance their employability prospects.

It is noted that the Department for Employment & Learning has been working closely with the SEUPB to ensure complementarity between the ESF Programme and the proposed PEACE IV Programme (Consultation on the Northern Ireland 2014–2020 ESF Investment for growth & jobs Programme, DEL, July 2013).

There is a need to ensure that the relevant government departments, statutory bodies and youth organisations implementing this Objective are aligned with community planning processes in local authority areas.

It would be desirable that relevant Departments (e.g. DEL and Dept of Education) commit to working with local government to ensure a strategic and co-ordinated approach in relation to development and delivery of any youth programmes under local authority led action plans in the proposed PEACE IV Programme ; on any proposals for enhanced training, education and employment programmes targeted at NEETs and on any youth service initiatives designed to build tolerance, respect and inclusiveness under the proposed PEACE IV Programme and in the development of initiatives under the Together: Building a United Community strategy as referenced in the draft Operational Programme.

Successful PEACE III Projects along similar lines to the PEACE IV Objective outlined above include the Youth Engagement Project (led by Council's Community Safety Unit); Growing Respect Project (led by Council's Parks & Leisure Department) and various projects run by 3rd sector organisations under the Belfast PEACE III Plan. 63% of participants in the overall Belfast PEACE III Plan were under 25.

It has been proven that while summer interventions are successful and are welcome by the local community and statutory partners in dealing with issues at times of tensions, these can be seen as reactive. It is acknowledged that work with young people who are involved in anti-social behaviour at times of tension should be delivered with a year round focus - not just in times of tension.

The council sees opportunities to progress this work in line with TBUC proposal to have a longer term intervention programmes throughout the year, progressing long term key work with young people to ensure better collaboration across communities, which will help break the cycle of interface related issues.

In 2011, an independent report was completed by Deloitte on Intervention work that highlighted a number of elements concerning this field of work. Building on that report, we would propose that Peace IV allows the development of long term programmes taking into account the following key elements:

1. Intervention work needed to be a year round process



## Content of the Draft Cooperation Programme for PEACE – Children and Young People

2. Allocation of funding for intervention work to the community and voluntary sector needed to be undertaken earlier in the year
3. There still needed to be a reactionary mechanism to support intervention work in unexpected times
4. Non financial assets need to be utilised to support intervention work within communities such as schools, leisure centres etc
5. Development of a tool kit on systemic peace building and a good practice guide on intervention work

The Peace III funded Youth Engagement Programme that commenced in January 2012 is aimed at developing an inter-agency approach to youth engagement and tackling issues faced by young people in interface areas. It has focused on the following four interface areas:

- M1 - Westlink
- Blackmountain
- Ardoyne - Woodvale
- Inner-east Belfast.

As part of the project, agencies with an interest in youth-related crime and antisocial behaviour have worked with the community sector to engage young people. This programme has proven to be very effective but is ending. Belfast City Council would be keen to take the positive learning from this project, extend and further develop it into a wider youth engagement programme.

The Council, as a key partner in the Belfast Strategic Partnership, is exploring the development of a Belfast Works project that is aimed at overcoming barriers to worklessness in the context of the specific challenges of Belfast. This potentially provides opportunities to improve the employability of young people throughout the city.

## Content of the Draft Cooperation Programme for PEACE – Shared Spaces and Services

The first consultation advocated strong support to continue to build upon shared space legacy projects. During the consultation process, the requirement to facilitate further removal of visible and invisible barriers between communities also received strong support. It is envisaged that the integration of communities can be facilitated and improved through the investment in an increased number of shared spaces and services.

Support will be provided to transform segregated urban, rural and border areas which are in need of regeneration into 'shared spaces' that will encourage greater levels of cross-community interaction. These spaces will be specifically designed to help reduce the levels of sectarian and racially-based division across the eligible area.

Specific Objective: To create a more cohesive society through an increased provision of shared spaces and services.

Actions to be supported:

- Capital developments to create shared spaces, both urban and rural;
- Programming initiatives designed to facilitate maximum and sustained levels of shared usage within these shared spaces;
- Public/Community partnerships and facilitation for programme activities for shared space;
- Protocol development programmes to facilitate greater collaboration between people and places;
- Regeneration activities to ensure that public spaces are welcoming to all and respectful of cultural identity;
- Shared services to address the trauma related needs of Victims and Survivors.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

34. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strongly agree       Agree       **Neither agree nor disagree**       Disagree       Strongly disagree

35. Do you think that the indicative €90m (€20m of which will be delivered via local authority led Peace Action Plans) allocated budget for this objective is appropriate?

Strongly agree       Agree       **Neither agree nor disagree**       Disagree       Strongly disagree

36. Please provide any additional comments you may have on the Shared Spaces and Services objective for the Programme.

In addition to delivery of programmatic work under the local action plans the new Belfast Local Authority should be considered for delivery of large scale iconic capital projects for the benefit of the region.

As communicated to SEUPB in July 2013 it is the opinion of Belfast City Council that the Gateway to North Belfast Cultural Connections Project is a project of regional importance with two of the most iconic buildings in the city, the Crumlin Road Courthouse and the Gaol, at its centre and with the real potential to be transformational in an area which has suffered some of the worst impacts of the conflict. The Council believes there is the potential to use these building as a shared history Belfast Story museum, built heritage centre and destination point for the north Belfast cultural corridor and the development of the Crumlin Road Gaol as an iconic cultural industries space in one of the 2 vacant wings, in partnership with the Arts Council and OFMDFM..

## Content of the Draft Cooperation Programme for PEACE – Shared Spaces and Services

Recent research commissioned by Belfast City Council (Urban Strategies 2014) identified eight principles as part of the city centre regeneration strategy and investment plan:

1. Increase the employment population
2. Increase the living population
3. Maximise the tourism opportunity
4. Manage the retail offer
5. Create the region's learning and innovations centre
6. Create a green, walkable, cyclable centre
7. Connect to the city around
8. A shared space

The report also highlighted the importance of the North Centre area for Belfast with the major opportunities arising from the relocation of the University of Ulster to this area.

It will be important for the success of any capital investment project that there is wrap around programming that includes involving local people in shaping the nature and function of the development to ensure meaningful engagement, ownership and a feeling that it is indeed "shared space." This will assist with achieving a significant level of transformative change.

DSD appointed a design team to develop a 'shared' public realm scheme in this area for the city. However, investment is yet to be secured for the scheme. The council believes there is significant potential to link the public realm scheme with the North Belfast Cultural Corridor.

The opportunity presented by this Objective for resourcing programmatic work in line with the above principles is to be welcomed.

Other key capital projects which are identified through the new Council's Capital Programme over the duration of the PEACE IV Programme should also be considered for support where there is a robust business case and demonstrable fit with the objectives of the Programme.

## Content of the Draft Cooperation Programme for PEACE – Civil Society

The creation of a cohesive community involves addressing issues of isolation, polarisation, division, prejudice and stereotypes between and amongst different groups.

A number of initiatives will be supported that help promote the upcoming centenary commemorations in a peaceful and respectful manner. Assistance will also be provided to support networks that will increase the participation and integration of minority and marginalised groups, in line with the 'Together: Building a United Community' strategy.

Specific Objective: The creation of a society characterised by good relations and respect, where cultural diversity is celebrated and people can live, learn and socialise together, free from prejudice, hate and intolerance.

Actions to be supported:

- Structured programmes of activities involving groups from different backgrounds;
- Training and development programmes for inclusive civil leadership;
- Development of strong local partnerships aimed at addressing local problems of sectarianism and racism;
- Civil society development programmes;
- Programmes aimed at engaging individuals and communities not previously involved in peace-building activities who wish to contribute to a shared society.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>.

37. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strongly agree

Agree

**Neither agree nor disagree**

Disagree

Strongly disagree

38. Do you think that the indicative €30m allocated budget for this objective is appropriate? (It is proposed that the full €30m will be delivered via local authority-led Peace Action Plans).

Strongly agree

Agree

**Neither agree nor disagree**

Disagree

Strongly disagree

39. Please provide any additional comments you may have on the Civil Society objective for the Programme.

Council's Good Relations Partnership has successfully delivered both Phases of the PEACE III Local Action Plan. During the conflict, Belfast was the seat of the most intensive violence in NI and suffered disproportionately as a result. This should be reflected in the development of any new PEACE IV Programme and allocation of financial resources.

The indicative activities outlined in the draft Operational Programme offer a good fit with Council's initial consultation response made in November 2012, namely:

- Actions to create and promote use of shared public space and promote mobility within and between communities as a lack of economic, cultural and social mobility across the city has been identified as one of the key inhibitors to good relations in the city.
- Actions to develop and deliver integrated interface regeneration strategies.
- Actions to promote inclusive cultural expression and celebration.
- Actions to align good relations/ peacebuilding and conflict transformation activities with the processes of existing policy development in areas such as education, regional strategic

planning, urban and rural regeneration and community development and culture, arts and leisure provision.

- Successful PEACE III Projects along similar lines to the PEACE IV themes identified above include the Migrant & Minority Ethnic Project (led by Council's Good Relations Unit); Youth Engagement Project (led by Council's Community Safety Unit); Interfaces Project (led by Council's Good Relations Unit); Growing Respect (Parks & Leisure) and Creative Legacies project (Tourism Culture & Arts Unit) plus various projects run by 3rd sector organisations under the PEACE III Plan. A copy of the PEACE III Evaluation report (June 2014) has been attached for reference to this response.

Council's Corporate Management Team has already agreed that the current planned process for Community Planning would be the appropriate mechanism for the development of any local integrated strategy for PEACE IV e.g. work underway and planned on local development plan; spatial development plan and community development plan and further agreed that development of any plans for PEACE IV should be considered in this context and aligned as much as possible to this work. The Local Action Plans also need to be aligned with Council's Good Relations Strategy and the Building United Communities Strategy and reflect in particular the desired outcomes for the children and young people of the city, families and local communities.

It should be noted that key pieces of work to be developed by the new Council include:

**Area based regeneration**, including

- Neighbourhood renewal;
- City centre event grants; and
- Masterplans and development frameworks.

**Community development**, funding programmes for the voluntary and community sectors, including overall responsibility for the Community Support Programme (currently delivered by our Community Services team); and Community Investment Fund grants.

**Physical development**

- Strategic regeneration projects such as the PEACE III funded Girdwood development.
- The progression of the Council's Leisure Transformation Programme, a major renewal of its leisure facilities with a £105million investment during the next 10 years

It is important that proposals for the development of new Local Action Plans are flexible enough to ensure that they will be fully aligned with ongoing work in the areas noted above.

SEUPB guidance on developing Local Action Plans should be issued as soon as possible to Local Authorities.

As part of local government reform, the Council will be responsible for developing strategic regeneration frameworks for the city. While the format for these has still to be developed, the Council would see great potential in embedding the principles of the SEUPB Peace IV programme and associated projects in the strategic regeneration frameworks.

## Reducing the Administrative Burden – Application and Approval of Projects

The responses to the initial public consultation highlighted a number of concerns about the administrative burden placed upon beneficiaries accessing funding under the PEACE and INTERREG Programmes. In a response to these concerns and to the opportunities presented in the regulations, the SEUPB has agreed a number of administrative simplifications with the Member States, as detailed below:

- **Application process:** Support will be available to potential applicants through information seminars and workshops. Where appropriate a two stage process will be used. Stage one will be a short application form, with applicants receiving a decision within three months of applying. Applications emerging from stage one of the process will then be invited to provide additional detailed information for stage two of the application process.
- **Information on calls for grant aid:** The Managing Authority will publish a rolling 24 month programme of calls for applications. Calls will have a high degree of focus and will detail the results and outputs required and total financial allocation of each call. A calendar of Steering Committee dates will be published at the time of the call. The SEUPB and Member States are committed to reducing processing times to not more than 40 weeks. More details on targets for processing times will be included within the final CP following conclusion of the discussions on the assessment process.
- **Assessment:** The primary purpose of the assessment process is to assess the potential of the proposed project to deliver the specified results and outputs of the programme in a cost effective manner. The details of assessment process are under discussion between the SEUPB and the Member States.
- **Allocation of funding:** The regulations require that the final decision on the allocation of grant aid is made by the Steering Committee (appointed by the Programme Monitoring Committee). The Steering Committee will include representatives of the Member States, accountable departments and social partners. The Steering Committees will have access to required technical and financial expertise to make an informed decision. There will be no additional approval processes post-Steering Committee.
- **Match-funding:** The intervention rate for both programmes will be a maximum of 85%, i.e. ERDF can fund up to 85% of eligible costs. The remaining 15% match-funding can come from a range of non-EU sources, including central government, local government, other public or private sources. Match-funding can take the form of cash or contributions in kind (non-cash contributions such as staff time).

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>

40. Do you think that these proposals are adequate in terms of reducing the administrative burden for beneficiaries?

Strongly agree

Agree

**Neither agree nor disagree**

Disagree

Strongly disagree

41. Please comment on any of the specific measures, as detailed above, in relation to reducing the administrative burden on beneficiaries.

### Peace IV

With the ongoing programme of local government reform in the lead up to the new local authorities coming into effect on 1 April 2015 there is still a significant amount of work to be done on identifying and allocating resources for key service areas and ongoing change initiatives. It is felt that new Councils will be reluctant to commit significant match resources until the overall long term financial requirements are clarified. Belfast City Council's initial consultation response submitted in November 2012 recommended that match funding should be provided centrally by one accountable department for any future PEACE IV Programme.

SEUPB is requested to note that work is currently underway to clarify the financial position of the new Council with key workstreams including:

- Striking the Rate for 2015 – 2016
- Agreeing the budget for new Council
- Preparing a Medium Term Financial Plan
- Considering the future Capital Programme

The strategic financial decisions of the council are to be made in January 2015 in order that the district rate can be set in February 2015 as required by legislation. It would therefore be very important for the Council to be made aware of potential Peace IV funding at this point so that the match funding requirements can be included in the budget estimates and calculated into the Council rate setting process.

SEUPB should commence engagement with Shadow Councils in consultation with the relevant accountable departments in advance of finalising the match funding requirements for the Programme.

Under the PEACE III Programme it was nearly 4 years from submission of the initial Girdwood application to receipt of a Letter of Offer. The same information was requested at different times and at different stages of the approval process. The proposed two stage application process and rolling programme of calls is therefore to be welcomed as is the commitment to reduce the length of time taken in the assessment of project proposals.

The proposal for more training and guidance for Lead Partners at an early stage is also welcomed.

### **INTERREG V**

COMET welcomes the proposal to reduce the administrative burden associated with the programme, however there is a lack of specific detail available at this time so it impossible to determine whether these proposals are adequate or not and we suspect that the burden will be shifted to lead partners.

Application process - the introduction of information seminars and a more efficient application process is welcomed. The introduction of Stages one and two is also welcomed; however, the response to the short application form, with applicants receiving a decision within three months of applying is too long.

Information on calls for grant aid - the introduction of a rolling programme of calls for application is welcomed; however every effort should be made to further reduce the processing times to less than the proposed 40 week period, particularly as other EU programmes manage to assess projects within 20-24 weeks.

Assessment – As indicated the details of the assessment process are under discussion between the SEUPB and the Member States so at this time COMET would recommend the following:

- Open transparent criteria outlining at commencement of the Programme how maximum of 40 weeks approval process will be achieved – or indeed a lesser time.
- One Economic appraisal per project commensurate with grant sought
- One Corporate view sought from Departments and Statutory Agencies within an agreed timeframe. These organisations can effectively veto a project with no discussion with the promoter – there needs to be an opportunity to discuss projects with Government

### Departments.

- Promoters are afforded the opportunity to present their project to the departments and statutory organisations during the application process. This would enable these agencies to be fully appraised of the project so that when the project is actually submitted they are clear on the aims and objectives etc. This would also instil confidence in promoters that their application is fully understood.
- Project Promoters should have the opportunity to present their project to the INTERREG Steering Committee. Promoters know their project best and are best placed to answer queries from Steering Committee members. Government Departments and Statutory Agencies have a 'Member State' as opposed to cross border view when assessing projects.
- Steering Committee decision should be final in line with all other INTERREG Programmes; however the Steering Committee **must** be made up of experts in the field of the project.

Match-funding - in a period of efficiency savings, if a contribution of 15% matched funding is required from Local Authorities this would put them under additional budgetary pressure. This will have to be factored in to the current Councils medium financial plans well in advance of striking the rate for the new Council in February 2015. This will not be possible due to calls not opening until at least spring of 2015.



42. Do you have any additional suggestions on reducing the administrative burden to project applicants in relation to the application, assessment and approval of projects?

### **Peace IV**

#### **What works well**

- The current model of a partnership approach led by Local Authority allows the flexibility to respond to locally identified need and has worked well.
- Development & Delivery of Strategic plans has worked well
- Flat Rate for overheads has reduced the administrative burden.
- Local communications/ engagement and networking activity has resulted in enhanced buy-in and positive feedback process.

#### **What could be improved**

- Lengthy assessment and approval process negatively impacting upon timescales for delivery
- Co-ordination with other PEACE Local Action Plans
- Need for flexibility in the inspection & verification regime
- More of a focus on outcomes rather than compliance and administrative process.
- Cooperation/ Information Sharing with other funders and agencies.

### **INTERREG V**

COMET suggests that current challenges such as match funding and “fit” with National priorities are addressed at the outset of the INTERREG V Programme, which would go some way to addressing the duplication issues that are continually being highlighted by Departments and Statutory Agencies.

COMET asks that Government departments work in Partnership with SEUPB to ensure that the current issues regarding project approvals do not transfer into the INTERREG V Programme, thereby avoiding the prolonged delays in approval of project or in some cases projects not been approved.

## Reducing the Administrative Burden – Project Implementation

- Harmonisation of rules: common rules will be applied for both PEACE and INTERREG to include a single set of rules applied throughout the eligible areas of both programmes.
- Project duration: the duration of the project can be up to seven years depending on the nature of the activities being proposed.
- Monitoring: the number of indicators within a letter of offer will be reduced to not more than three project-specific indicators in addition to programme indicators. Arrangements for monitoring the horizontal principles will be reviewed to ensure effectiveness and to minimise the burden on Programme beneficiaries.
- Budget structure: a simplified budget structure will be used within the letter of offer. This will increase operational flexibility of Lead Partners in the implementation of operations without the requirement to seek approval for modifications to sub-budget lines.
- Simplified costs: all relevant projects will avail of the flat rate overheads. Where there is suitable basis for unit costs, this methodology will be mandatory. There will be limited scope to apply lump sum payments, but these will be used as appropriate.
- Lead Partners: local authorities and other lead partners engaging with a large number of final beneficiaries will be required to state how they are reducing the administrative burden for financial beneficiaries.
- Verification: a focus on unit costs and outputs will significantly reduce the level of verification of underlying financial transactions. The verification process will include control checks to ensure the accuracy and reliability of data collection and input into the central database.
- Letter of Offer: additional comments in a letter of offer will be reduced to the minimum to help ensure effective management. It is also proposed to issue all letters of offer within the new programming period in Euro.
- E-cohesion: there will be an opportunity for all applicants to apply online if they wish to do so. Applicants will also be able to review the status of their application online. Lead partners will have access to up-to-date monitoring and financial information online.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>

43. Do you think that these proposals are adequate in terms of reducing the administrative burden for beneficiaries?

Strongly agree

Agree

**Neither agree nor disagree**

Disagree

Strongly disagree

44. Please comment on any of the specific measures, as detailed above, in relation to reducing the administrative burden on beneficiaries.

### **Peace IV**

The potential to bid for long term pieces of work i.e. 6-7 years duration is to be welcomed and will allow for more focused and strategic interventions as well as allowing for the implementation of robust monitoring and evaluation processes capturing the real impact of changes and lasting outcomes of any intervention.

The Draft Operational Programme states that Lead Partners will be required to use unit costs, flat rates, lump sums or resource allocation models to reduce the administrative burden for final beneficiaries and that this will form part of the assessment process. Further clarity is required on how this issue will be dealt with as there is a concern that this approach would expose Lead Partners to increased financial risk at the point when Lead Partner claims are submitted given different interpretation of guidelines/ processes etc if the Lead Partner processes are not considered and agreed by SEUPB in advance.

The proposed simplified budget structure for Letters of Offer affording greater flexibility to Lead Partners is to be welcomed.

The proposed simplification re use of unit costs is to be welcomed but further clarity is required on how this approach will be applied in order to minimise financial risk to the Lead Partner.

Increased data reporting functionality is to be welcomed but there is a concern that if systems are not established and communicated to Lead partners in a timely fashion then the real value of the proposed change will not be realised. For example there was limited reporting functionality available to Lead Partners on the System 7 database used under PEACE III.

There is a concern over the level of risk associated with exchange rate fluctuations if Letters of Offer are to be issued in Euros. Further clarification is required from SEUPB on how this risk can be best managed.

### **INTERREG V**

- Harmonisation of rules - the harmonisation of rules across both Programmes is welcomed.
- Project duration - the extended Programme is welcomed, with allowance for projects up to 7 years, subject to regular review and provision for adjustment where required.
- Monitoring - the introduction of not more than three project-specific indicators is welcomed, providing that the indicators are SMART.
- Budget structure - a simplified budget structure is welcomed providing that the detail behind high level costs, are agreed in advance of the commencement of the project.
- Simplified costs - the introduction of flat rate and unit costs is welcomed. The basis of which would have to be agreed with sub-projects in advance of the commencement of each project. However it should be noted that both may disadvantage smaller community and voluntary groups. COMET would caution the use of lump sum payments, due to potential risks involved e.g. claw back due to failure to deliver results.
- Lead Partners - Councils would endeavour to simplify the administrative burden on sub-projects as outlined in the draft document, providing that the procedures do not contravene their internal financial procedures.
- Verification - whilst the focus on unit cost and outputs is welcomed, the introduction of payment by results may have a negative impact on those delivery organisations which

cannot guarantee participation or are engaging with “hard to reach” or “low capacity” groups, such as those traditionally involved in previous programmes. The proposed risk based verification sampling is also welcomed.

- Letter of Offer - all conditions of offer applied by SEUPB to lead partners should be applied to sub-projects. Issuing letters of offer in Euros could have a significant financial impact on lead partners and sub-projects and this suggestion is not in line with the simplified procedures proposed in this draft document.
- E-cohesion - The introduction of e-cohesion from the first call is welcomed.

45. Do you have any additional suggestions on reducing the administrative burden on beneficiaries?

### **Peace IV**

No

### **INTERREG V**

COMET suggests that the production of simple, clear Guidance at the outset of the programme, which remains unchanged for the duration of the programme.

The provision of standardised training for beneficiaries in advance of the Letters of Offer being issued by SEUPB and regular training during the lifetime of the Programme would also be most beneficial.

At this time in order to ensure exemplary corporate governance there is no attempt to incentivise local authorities to take it on or to lead on projects and this needs to be considered.

As recently at May 2014 a presentation was made to Councils with a distinct element for Councils to deliver – this has now disappeared – why?

There has been no mention of penalty clauses – are they still there and if so this is of concern particularly with large projects. This needs to be clearly outlined from the outset in the guidelines so that project promoters/lead partners know before they consider submitting projects. In other words no surprises as there have been in the past.

## Section 75 Considerations – PEACE

As a designated public authority under Section 75 and Schedule 9 of the Northern Ireland Act 1998, the SEUPB has a statutory obligation to promote both equality of opportunity and good relations.

In line with these statutory duties the SEUPB has undertaken a thorough screening of the new PEACE Programme, the results of which are detailed below. (The Section 75 Considerations can be located on the SEUPB website at <http://is.gd/zXxN9x>).

The screening concluded that there were major positive impacts across four of the nine Section 75 grounds (religious belief; political opinion; race/ethnic origin; and age), neutral impacts upon sexual orientation and marital status with minor impacts on three grounds (gender, disability and dependency). These were all regarded as positive impacts that would help to promote equality of opportunity and good relations, hence the programme should not be subject to a further Equality Impact Assessment.

The SEUPB will continue to monitor the programme, including the application process through to full implementation in order to identify and remedy any emerging adverse impacts.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>

### 46. Do you have any comments in relation to the Section 75 screening process carried out by the SEUPB for the PEACE Programme?

Whilst we welcome the extensive analysis of the policy for the purpose of screening for equality and good relations impacts we would note the following:

Your Equality Scheme Para 4.8 states that:

‘In order to answer the screening questions, we gather all relevant information and data, both qualitative and quantitative. In taking this evidence into account we consider the different needs, experiences and priorities for each of the Section 75 equality categories. Any screening decision will be informed by this evidence.’

The presentation of the available evidence, pp. 10-18 of the screening document, and ‘needs, experiences and priorities’, pp. 19-21, does not consider each of the Section 75 equality categories separately and distinctively. Presenting the available evidence in this way does not facilitate clarity of understanding in the responses to the equality and good relations screening questions.

From the evidence presented there are clear differentials in several areas e.g. poverty, employment and health, between the two main community backgrounds. The development of a programme to tackle these differences and ‘aspires to build a cohesive, united community based on tolerance, respect and inclusivity’ is welcomed.

Paras 4.9 – 4.10 of your Equality Scheme summarises the three outcomes on the completion of screening – screened in, screened out with mitigation, screened out without mitigation. Part 3: Screening Decision presents four related, but different, outcomes, with the addition of ‘Not be subject to an EQIA at this time’.

### 47. Do you agree with the Section 75 screening decision reached by the SEUPB with regards to the PEACE Programme?

Yes

No

## Section 75 Considerations – PEACE

48. Do you have any comments on the Section 75 screening decision reached by the SEUPB with regards to PEACE?

The decision is that the policy is 'not be subject to an EQIA (with mitigating measures/alternative policies i.e. screened out with mitigation. The mitigations which will be put in place are unclear.

Given the strategic importance, evidence presented and amount of investment consideration should be given to conducting a full EQIA when the consultations responses have been collected, analysed and integrated into the programme.

## Section 75 Considerations – INTERREG

As a designated public authority under Section 75 and Schedule 9 of the Northern Ireland Act 1998, the SEUPB has a statutory obligation to promote both equality of opportunity and good relations.

In line with these statutory duties the SEUPB has undertaken a thorough screening of the new INTERREG Programme, the results of which are detailed below. (The Section 75 Considerations can be located on the SEUPB website at <http://is.gd/zXxN9x>).

The screening concluded that there were minor, positive impacts across four of the nine Section 75 grounds (race/ethnic origin; age; disability; dependency). It found that there were neutral impacts upon sexual orientation, marital status, men and women generally, political opinion and religious belief and hence the programme should not be subject to a further Equality Impact Assessment.

The SEUPB will continue to monitor the programme, including the application process through to full implementation in order to identify and remedy any emerging adverse impacts.

For more information please refer to the Consultation Information Document at <http://is.gd/zXxN9x>

49. Do you have any comments in relation to the Section 75 screening process carried out by the SEUPB for the INTERREG Programme?

We welcome the screening process and that SEUPB will continue to monitor the programme, including the application process through to full implementation in order to identify and remedy any emerging adverse impacts

50. Do you agree with the Section 75 screening decision reached by the SEUPB with regards to the INTERREG Programme?

Yes

No

## Section 75 Considerations – INTERREG

51. Do you have any comments on the Section 75 screening decision reached by the SEUPB with regards to the INTERREG Programme?



## Strategic Environmental Assessment – PEACE

The PEACE Programme is subject to a Strategic Environmental Assessment (SEA). The SEA is a systematic process for evaluating environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making, with a view to promoting sustainable development. The process of SEA was introduced under European Directive 2001/42/EC12.

The SEA for PEACE can be found at the following link <http://is.gd/zXxN9x>

52. Does the SEA for the PEACE Programme cover all of the relevant information?

Yes

No

53. Do you have any additional comments in relation to the SEA for the PEACE Programme

n/a

## Strategic Environmental Assessment – INTERREG

The INTERREG Programme is subject to a Strategic Environmental Assessment (SEA). The SEA is a systematic process for evaluating environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision making, with a view to promoting sustainable development. The process of SEA was introduced under European Directive 2001/42/EC12.

The SEA for INTERREG can be found at the following link <http://is.gd/zXxN9x>

54. Do you feel that the Strategic Environmental Assessment for the INTERREG Programme covers all of the relevant information?

Yes

No

55. Do you have any additional comments in relation to the Strategic Environmental Assessment for the INTERREG Programme?

No