

Public Consultation – New Programmes 2014-2020

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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.

Northern Ireland Environment Link (NIEL). NIEL is the national forum and networking body for organisations interested in the environment. Our 65 Full Members represent over 90,000 individuals. 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.

7. What is your role in this organisation?

Policy Officer

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

PEACE

INTERREG

Both

Content of Draft Cooperation Programme for INTERREG - Research & Innovation

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.

Increasing cross-border research and innovation in Health & Life Sciences and renewable Energy

While we are very supportive of the inclusion on renewable energy within this specific objective we would like to make a number of comments:

- We are disappointed that that Thematic Objective 4: *Shift towards a Low Carbon Economy* as listed in the previous INTERREG consultation (November 2012) has not been taken forward and that the opportunity for development of inter-regional projects and programmes which could have help us shift to a low carbon economy has been lost. Proposals by the Green New Deal group show that by focussing on reducing Northern Ireland's vast imported energy bill we can create thousands of high and low skilled jobs in the short term; substantially reduce our dependence on imported energy; make significant inroads into tackling fuel poverty; comply with international agreements to cut CO2 emissions; and lay the foundations of an internationally competitive low-carbon economy, thus securing employment and business success for the long term. Given the current economic climate this support could have helped Northern Ireland and the Border Counties gain a distinct competitive advantage as it achieves low carbon status. We would therefore like to see support ring-fenced for these type of activities.
- While very supportive of renewable energy technologies, such proposals must be accompanied by an appropriate EIA to avoid unintended consequences.
- Inappropriately sited and unsympathetic renewable energy development can affect the tranquillity and character of our countryside and undermine our capacity to deliver other environmental goods such as food, clean water and functional habitats.
- Where possible local communities who host renewable energy developments should benefit from their installation.
- Within the indicative list provided we would suggest that the phrase 'Energy production' is replaced with 'renewable energy production' to ensure that support is targeted at research around sustainable forms of energy as opposed to conventional fossil-fuel based energy fossil and fracking.

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 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 Neither agree nor disagree Disagree Strongly disagree

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

To Increase the number of SMEs engaged in cross-border research and innovation activity.

NIEL has no specific comments to make under this specific objective other than we would like to see targeted support for SMEs to facilitate the creation of a 'carbon army' and 'green collar' jobs to target the world market for Low Carbon Environmental Goods and Services such as: refurbishment of existing homes with full insulation and renewable energy and so making significant inroads into fuel poverty; decarbonising, regionalising and localising supplies of electricity and heat through renewables, micro-generation and using fossil fuels more efficiently; transforming the energy performance of public and commercial buildings through energy efficiency measures.

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.

NIEL is very supportive of this environment objective. We would however like to see an increased budget in order to address the range of cross-border issues outlined in the document. While €22m is to be welcomed, the 'Invasive Alien Species Strategy for Northern Ireland' (May 2013) estimates that the current annual cost of invasive species to the economies of Ireland and Northern Ireland is £161,027,307 (€202,894,406) and £46,526,218 (€58,623,034) respectively, a limited number of activities can only be undertaken.

While the specific objective currently targets '*the recovery of habitats and species of EU concern within protected areas that are contiguous with the border*' we would like consideration of funding being extended to beyond protected sites and in areas not contiguous to the border as many of these areas are of high biodiversity value. The Mourne AONB for example is not contiguous to the border despite the fact it looks across Carlingford Lough to the Cooley Mountains and both have SAC designations. Recovery of habitats and species therefore could usefully be funded from Interreg to address issues of common concern in similar areas on either side of – but not contiguous to – the border, as permissible under Interreg IV A.

NIEL would like to draw attention to a new publication authored by the Institute for European Environmental Policy (IEEP) which provides guidance on integrating biodiversity into EU Regional Development Fund (ERDF) in 2014-2020. The IEEP

publication entitled Handbook on Financing biodiversity in the context of the ERDF outlines how investing in the natural environment can bring significant welfare benefits, provide good return on investment and enhance socio-economic cohesion, thus contributing to major objectives of the EU Cohesion Policy. The purpose of this guidance is to help national and regional managing authorities to understand how they can make better use of ERDF to promote financing of biodiversity and how the conservation of natural capital - biodiversity, ecosystem and related ecosystem services - has a lot to offer for regional development. Examples of other activities which would be supported under this priority could include interregional partnerships dealing with: All-island Species Action Plans; Activities which increase fish stock levels and; Awareness raising of the value of biodiversity.

We believe inclusion of this thematic objective and support for the types of activities listed above would also help Northern Ireland meet its international commitments such as those listed within the Convention on Biological Diversity (Aichi Targets), and the EU Biodiversity Strategy 2011-2020 as well contributing towards targets contained within the new Northern Ireland Biodiversity Strategy. In addition the Operational Programmes and the activities they fund could be utilised to help Government Departments (and all public bodies) fulfil their requirements under the Biodiversity Duty as contained within the Northern Ireland Wildlife and Natural Environment Act 2011. This Act outlines the additional responsibility of all Departments to promote and embrace nature conservation when carrying out their daily tasks and the requirement for all departments to protect and maintain biodiversity on their own lands and those they have influence over; and to look for opportunities to enhance or restore biodiversity, or provide an educational input to others about biodiversity. The duty also extends to all activities carried out by a public body including the provision of grant aid to other bodies and/or individuals where there is a relevance to biodiversity. In meeting this statutory duty, public bodies must take account of the Northern Ireland Biodiversity Strategy published by the Northern Ireland Executive and the lists of priority species and habitats published and maintained by NIEA.

Finally, the Northern Ireland Biodiversity Group and their Republic of Ireland counterparts, the Irish Biodiversity Forum, would be useful sources of guidance in the design and delivery of this Thematic Objective.

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

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.

NIEL is very supportive of this specific objective and believe that addressing the significant needs for investment in the water sector will help to meet the requirements of the environmental acquis. In general NIEL believes that funding dedicated towards the delivery of the River Basin Management Plans to be the major issue affecting a water bodies in Northern Ireland. Improved water quality should be an NI Executive priority, and therefore should receive core funding as well as support through the INTERREG Programme.

Implementation of the Water Framework Directive (WFD), with its requirement for good ecological status, has resulted in the formulation of River Basin Management Plans. Three of these Plans operate on a cross-border basis because of shared catchments. Although the WFD says we must restore our rivers, lakes and wetlands by 2015, currently only 28% of our water bodies are on course to meet this target much less than the European average of 40%.

This priority should therefore support cross-border activities which will ultimately help both jurisdictions to meet their European requirements and avoid costly infraction proceedings for breach of the WFD and Nitrates Directives in particular. We therefore would make a number of comments on indicative actions listed under this objective:

- Wherever possible, damage to freshwaters and coasts should be fixed at source in the catchment. In this context, therefore, the entire water catchment (not just the immediate border area should be considered eligible for funding support). Intercepting pollutants, and constructing and maintaining mitigation measures, seldom delivers the wider benefits of a healthy and well-managed catchment, and often comes at a much higher long-term cost.
- While some funding will understandably be directed towards improving water treatment infrastructure, support needs to be made available for wider catchment activities such as tackling diffuse pollution and invasive species. Nitrate pollution, as an example, has well-documented risks to the health of future generations; the European Environment Agency costs this risk to the UK at €2.6bn annually. Furthermore invasive species along riverbanks are known to affect the integrity of flood defences, increase silting of rivers and decrease water quality due to an increase in soil erosion.
- NIEA statistics show that the majority of water bodies failing water quality standards due to diffuse pollution from agriculture.
- NIEL notes the publication of a recent report published by the European Court of Auditors (ECA) in May 2014 which reveals that the EU has been only partially successful in integrating water policy goals into CAP. We cannot assume therefore that adequate support will be available within the new Rural Development Programme to address this water quality issue. Support for farmers (particularly those working in a collective cross-border catchment water improvement activities) is therefore essential.
- We welcome the proposed support to tackle the problem of sewerage. While improvements have been made in sewerage collection treatment, with benefits to the wildlife in many rivers and lakes much remains to be done. Many smaller sewage treatment works still fail to meet modern standards, while un-sewered areas with often poorly-maintained septic tanks are

causing considerable damage through nutrient and faecal pollution. The water industry estimates that misconnections cause a daily sewage discharge to streams and rivers equivalent to all the foul waste produced by a town the size of Swindon (or about enough to fill 16 Olympic-sized swimming pools). Furthermore, it is estimated that there are some 120 000 septic tanks in NI. However, there are no accurate records, as regulatory controls were only introduced in the early 1970s. While a properly installed and maintained septic tank system is not likely to have any adverse impact on the environment, it is estimated that at least 12 000 septic tanks are not in possession of necessary discharge consents. We believe greater resources needs to be committed to better regulation of septic tanks supported by community awareness campaigns to ensure compliance. NIEL would also like to see a commitment towards innovative natural solutions to treat water such as constructed wetlands.

- Physical modification is the most common cause of damage to waterbodies. NIEL believes more effort needs to go into effort removing in-stream obstructions to fish passage, and believe that much more must also be done to reconnect rivers with their banks and floodplains, lakes with their shores, and all waterbodies with the wildlife around them. Projects to improve riverbank and coastal habitat, and to return fish to rivers, are often the most important ones to the people that live near rivers, lakes and coasts. A well-designed and ambitious scheme can make a world of difference to a community.
- Constructed Wetlands Demonstration sites would bring a number of benefits:
 - Improvement of the effluent quality of a wide range of point and diffuse sources of polluted water, by the removal of contaminants, thus meeting both regulatory and ecological requirements.
 - Slow water flow during rainfall events, thereby reducing the potential impacts of flooding whilst also providing storage of water for use.
 - Facilitate de-watering, composting (fungal and bacterial) and re-use of accumulated detritus and organic matter.
 - Reuse of intercepted water from different sources and at selected stages in the ICW treatment-train (municipal, industrial or agricultural)
 - Support biodiversity through the reanimation of habitat-infrastructure.
 - Capacity to interface and facilitate other land uses; agricultural, forestry and fishing enterprises.
 - Sustained long-term in situ sequestration of carbon-C, phosphorus-P and nitrogen-N
 - Education, amenity and recreation use.

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?

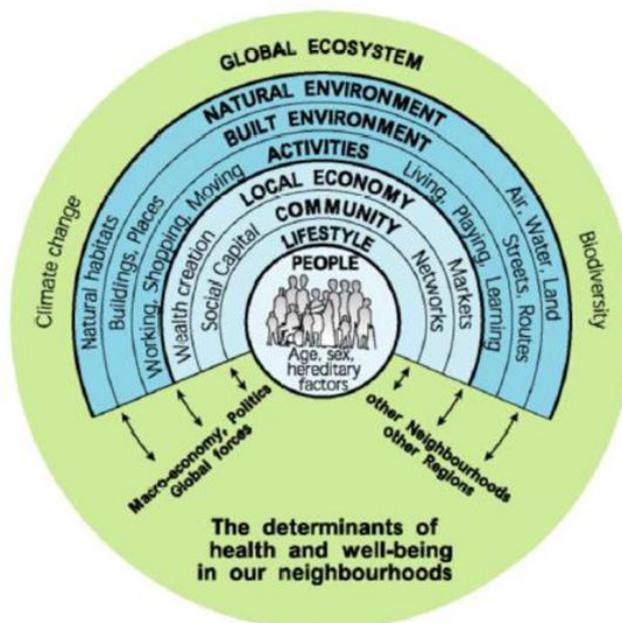
- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

NIEL believes that the promotion and protection of the natural environment should be 'up front and centre' within the INTERREG Programme and its corresponding thematic objectives. Environmental protection and enhancement are however inextricably linked to our wellbeing. The importance of the environment is best summarised in the diagram below entitled The Determinants of Health and Well-being in our Neighbourhoods and is we believe, the context upon which all European policies and funding programmes should be based. The role that accessible green spaces can play in improving people's wellbeing in areas such as obesity, mental health, dementia and autism has been the focus of a growing body of research and it has been calculated that the NHS could save £2.1bn a year if everyone had access to green spaces. Researchers from the University of Exeter, using data from 5,000 households over 17 years, found that people reported lower levels of mental distress and higher degrees of life satisfaction when they were living in greener areas.



Source: Barton and Grant, University of the West of England, 2006 (Origins in the Bruntland Report and in the work being undertaken by the World Health Organisation on healthy cities).

The Royal College of Physicians have linked the availability of green spaces with reduced stress, anger and depression. Furthermore as the fourth biggest cause of death in the UK was a lack of activity, it is important to provide green spaces in which people can exercise. Despite the growing body of research proving the link between the environment, accessible green spaces and well-being, the issue has not yet been fully integrated within our healthcare strategies. NIEL believes therefore that this specific objective should incentivise the development of initiatives that provide citizens with access to green spaces as part of a holistic approach to healthcare.

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.

NIEL welcomes the inclusion of this Thematic Objective and believes it is an essential requirement if we are to reduce the many negative impacts of our car-dependency culture. Strong linkage and integration with the Regional Transport Strategy and the Active Travel Strategy in particular would ensure that active travel choices become part of everyday life as an accessible, cheaper and healthier way to move around. Benefits of the inclusion of this Objective include the opportunity to:

- Increase the proportion of journeys made by walking, cycling and public transport, and reducing car reliance;
- Support activities that encourage physical activity and tackle obesity levels;
- Help reduce our greenhouse gas emissions. Transport accounts for a higher proportion of greenhouse gas emissions than any other sector, except agriculture;
- Reduce congestion levels. It is estimated that congestion costs the Northern Ireland economy £250 million a year;
- Offset the imbalance of spend between investment in road construction and investment on sustainable transport;
- Address many of the issues and targets highlighted within the NI Programme for Government 2011-2016.

Given the health, wellbeing and economic benefits derived from the creation of cycle networks, as demonstrated for example by the [Great Western Greenway](#), NIEL particularly welcomes the potential for development of a comprehensive cross-border cycle network. NIEL would highlight the multiple policy objective benefits of sustainable transport in terms of links with green infrastructure development and associated health (mental and physical) and environmental gains. A recent Inquiry by the Committee for Regional Development into the Benefits of Cycling to the Economy suggests further societal benefit to flow from this kind of cross—border network in terms of economic activity.

NIEL suggests that advice on the design and delivery of this Objective could be sought from [Sustrans NI](#).

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

Overall NIEL is content with the basic outline of the proposed programme. We would however, as highlighted earlier would have like to have seen the retention of the *Shift towards a Low Carbon Economy* thematic objective given the threat from climate change and the corresponding opportunity for energy saving and job creation initiatives.

Similarly, we note the omission of any reference to the sustainable urban development dimension and / or an integrated territorial investment option as highlighted in the previous INTERREG consultation in (November 2012). This option proposed that 5% of funding would be ringfenced for integrated sustainable urban development measures. If this were retained we believe our economy and environment could benefit in a number of ways as urban centres provide a range of opportunities for biodiversity through restoration of urban ecosystems and related services (e.g. urban wetlands, water bodies and green spaces). It also had the potential for strong linkages to the DSD's current proposal for an Urban Regeneration and Community Development Policy Framework and in particular, its plan to 'Improve Linkages between Areas of Need and Areas of Opportunity' through key actions such as the need for 'physical regeneration of interface areas, through environmental improvement..' and 'sustainable brownfield redevelopment, including the protection and improvement of buildings and open spaces, preservation of historic and cultural heritage, and development of community gardens, allotments and green spaces. The inclusion of such an option and its potential to promote urban green spaces can make a positive contribution to mental and physical health, childhood development, social cohesion and adaptation to climate change as urban ecosystems can also be significantly better utilised to enhance climate mitigation and adaptation (UK NEA 2011). For example, during heavy rainfall, water pouring off roofs and roads washes pollution from our towns straight into natural waterways. Sustainable Drainage Systems (SuDS) provide a more sustainable approach to draining surface water than the conventional practice of routing run-off through a pipe to a watercourse. The benefits of supporting projects which promote SuDS include: flood alleviation; pollution prevention; biodiversity enhancement and aesthetic benefits; water quality enhancement and climate change adaptation.