

DUP

Our Green and Pleasant Land
Pre-Consultation Paper

Comments by

Northern Ireland Environment Link

6 September 2019

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 65 Full Members represent over 100,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. NIEL also endorses the NI Marine Taskforce's comments on specific marine issues within the consultation. If you would like to discuss these comments further, we would be happy to do so.

Northern Ireland Environment Link
89 Loopland Drive
Belfast, BT6 9DW
P: 028 9045 5770
E: sean@nienvironmentlink.org
W: www.nienvironmentlink.org

Northern Ireland Environment Link is a Company limited by guarantee NI034988 and registered with The Charity Commission for Northern Ireland NIC10107

NIEL welcomes publication of this Pre-Consultation Paper and look forward to commenting on the full consultation paper in due course.

Response to Consultation questions

Over-arching approach

- What is your view of the three core aims of the policy?

That we can all live in a healthy, greener and pleasant place, region, country and world

We are generally content with this stated aim as it recognises the need for a range of actions at a local, national, international and global level. From an environmental perspective, there are clear advantages to seeking to maintain minimum common environmental standards and approaches across England, Scotland, Wales and Northern Ireland (the four nations), ideally with the freedom for any of the nations to take a more ambitious approach if they so choose. Given our additional shared land and sea borders with an EU member state, we believe that for NI these common standards also need to be aligned as closely as possible with Republic of Ireland standards if we are to effectively tackle environmental cross-border challenges. Key environmental issues that need to be addressed on a cross-border basis include shared overarching issues such as biodiversity loss and the condition of our freshwater and marine habitats. Other matters that also warrant co-ordinated cross-border action include climate change, air quality and energy supply. In essence, the island of Ireland comprises a single bio-geographic unit, with the two countries sharing common geology, landscapes, water catchments, and flora and fauna. It is important that these are cared for in a consistent and coordinated way.

That we can grow and develop economically while passing on an environment as good if not better than our generation received it.

The wording of this aim is problematic given the primacy given to economic development and the low level of environmental ambition. The pursuit of economic development rather than sustainable development i.e. development that meets the needs of the present without compromising the ability of future generations to meet their own needs, has led to Northern Ireland being regarded as the 'dirty corner' of Europe. Unfortunately, all current environmental indicators in Northern Ireland continue to show at best a stagnation in poor environmental standards in some areas with a decline in others. We would therefore suggest a rewording to simply say '*an environment better than our generation received it*'.

That we gain economic advantage by seeking to be in the forefront of technical innovation to achieve environmental goals that are common across the world.

The wording of this aim suggests that the main reason for improving our environment is/ should be for economic advantage. Again, this represents a narrow view of what development is, and should be about and would not be consistent with the concept of sustainable development. Furthermore, while technical innovation that helps achieve a better environment is to be welcomed, the main thrust of any environmental policy must be centred first and foremost around behaviour change at all levels of society.

What is your view of the underlying philosophy to the assessment and adoption of new policies?

We are not sure what *'the underlying philosophy is that the perfect should not be the enemy of the good and that environmental progress has too often been held back by seeking perfection and as a low tax party a sceptical approach to taxes'* actually means.

As previously stated all current environmental indicators in Northern Ireland continue to show at best a stagnation in poor environmental standards in some areas with a decline in others. We would suggest therefore that there has been very little evidence of 'seeking perfection' in relation to environmental improvement. In many cases however it can be argued that action in areas such as climate change and ammonia deposition has been unjustifiably delayed by the on-going questioning of local and internationally accepted science and evidence in order to justify a failure to act.

Four themes

- Are the four themes sufficiently comprehensive?

The four themes listed are reasonably broad in nature to allow for a range of corresponding policies and actions to be developed.

Theme 1: Global Environmental Policy and the UK's role,

1b) Commitment to development and implementation of Global Agreements.

The UK is a signatory to a range of international Environmental agreements such as:

- World Heritage Convention
- Convention on Biological Diversity (Nagoya/Aichi)
- RAMSAR - The Convention on Wetlands of International Importance
- OSPAR - The Convention for the Protection of the Marine Environment of the NE Atlantic
- Bern Convention on the Conservation of European Wildlife and Natural Habitats
- Bonn Convention on the Conservation of Migratory Species of Wild Animals
- Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters
- United Nations Framework Convention on Climate Change

However, currently the UK uses measures within the EU Directives to meet these international commitments. In a post-Brexit scenario therefore, it is imperative that new policies and legislation is introduced as a matter of urgency to ensure we meet our international responsibilities.

1c) Multi-lateral government action - we agree that no one country can take the lead on all issues. We believe however that as a signatory to the UN Sustainable Development Goals (SDGs) the UK/ NI should use this shared blueprint for peace and prosperity for people and the planet, now and into the future. The SDGs were an urgent call for action by all countries in a global partnership and recognises: *'that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests'*. Unfortunately, to date NI has failed to embrace its SD responsibilities. We suggest therefore that the DUP promotes and utilises the SDG framework in order to achieve true sustainable development at home and abroad.

1d) Foreign Aid and the Environment - NIEL would support the introduction of measures to ensure foreign aid does not support or promote environmental damage but rather actively contributes to environmental protection and enhancement. This approach would be consistent with actively promoting good environmental practice at a global level as well as our international obligations as outlined above.

Another important and practical way in which the UK/ NI can advance environmental interests abroad is by promoting fossil fuel divestment by getting rid of stocks, bonds, or investment funds that are unethical or morally ambiguous and immediately freezing new investments in fossil fuels. While MLA pensions are being divested from fossil fuels there is an opportunity for the DUP to promote this policy across all sections of Northern Ireland society including at the local government level where the Local Government Pension Scheme for Northern Ireland (LGPS NI) is still investing millions in climate damaging fossil fuel industries. There is a need therefore for the governing body of LGPS NI, - the Northern Ireland Local Government Officers Superannuation Scheme (NILGOSC) - to completely divest the pension scheme from fossil fuels by 2022.

Theme 2: Environmental Protection

2a) Air Pollution

The document rightly identifies the issue of air pollution as a major concern to human health. However, air pollution from the introduction of a range of substances into the atmosphere from a wide variety of sources is having not only a detrimental impact upon our health, but also has impacts on the wider environment. The government has published a clean air strategy that details the issues that need to be addressed in Northern Ireland. It confirms that air quality issues here come from three sources; namely road traffic emissions, particulate matter from the burning of coal and ammonia emissions from agriculture.

Government statistics estimate that air pollution in the UK reduces the life expectancy of every person by an average of 7-8 months, with an associated cost of up to £20 billion each year. As NO₂ pollution is closely linked with vehicle emissions, particularly diesel engines we believe a green transport strategy aimed at reducing the number of vehicles on our roads and increasing access to public transport is required as a matter of urgency.

In terms of Ammonia, emissions of ammonia in Northern Ireland have increased by 5% since 2005 - the bulk of it from farming. When deposited as nitrogen and it can damage sensitive and protected habitats. Currently in Northern Ireland: 90% of Protected Habitats; 98% of Special Areas of Conservation and 83% of Special Protection Areas are exceeding critical loads of N deposition, i.e. the point at which ecological damage occurs. Government intervention is required to strengthen regulation, monitoring & enforcement as well as providing advice and support to farmers.

2b) Water Pollution

While supporting the stated the theme of water pollution, NIEL believes that the whole issue of water needs to be tackled in a more holistic way. We need to change our approach to the management of freshwater in Northern Ireland to positively impact upon water quality, water efficiency and to protect our water dependent habitats. Economic benefits from improved water quality arise in the form of reduced costs of water treatment, increased revenue from tourism and a more cost-efficient supply chain for food production. In response, in 2012 the Northern Ireland Freshwater Taskforce produced a ten-point action plan entitled [From Source to Sea](#). This publication outlined how Northern Ireland can achieve sustainable water use and restore our freshwater environment. It pushes sustainable

water use further up the policy agenda by encouraging Government and wider society to adopt a sustainable and integrated approach to water management. Unfortunately, this document is still as relevant today as at the time of its publication and should be the starting point for action on freshwater and water pollution.

2c) Future Development

We support the view that Local Development Plans need to be assessed and consideration given to what needs to change to ensure we have a healthier and more pleasant place to live. As current patterns and forms of development are unsustainable, Council Local Development Plans cannot just contain more of the same. The overall Northern Ireland approval rate for all planning applications was 93.2% in 2018/19; similar to the rate in 2017/18 (93.8%). Since 2012/13, the overall approval rate for planning applications has remained fairly stable; ranging from 93.2% to 94.5%. Approval rates varied across councils during 2018/19, from a high of 98.4% in Mid Ulster to a 'low' of 80.2% in Newry, Mourne and Down. Land is a finite resource, under strain from ever-increasing societal demands and conflicting land use priorities. We believe that the development and implementation of a Land Strategy for Northern Ireland should be brought forward as a matter of urgency. We would refer to the 2015 Report '[Towards a Land Strategy for Northern Ireland](#)' prepared by the James Hutton Institute for the NI Land Matters Taskforce. The report recommends a Northern Ireland Land Strategy to support the Programme for Government, sitting above the suite of sectorial policies and alongside other strategic documents such as the Strategic Planning Policy Statement. A Land Strategy cannot, and should not, determine actual land use in specific localities; this should be shaped locally by communities, groups and individuals. Rather, it represents an overarching framework to ensure local and regional policy, decision-making and resource allocations contribute to fulfilling the strategic needs of Northern Ireland.

2d) Oversight

As highlighted earlier, all current environmental indicators in Northern Ireland continue to show at best a stagnation in poor environmental standards in some areas with a decline in others. The majority of these poor environmental indicators can be attributed to poor environmental governance. Environmental protection in Northern Ireland causes problems for the health of our people and wildlife, as well as for our economy. Northern Ireland remains the only country of the UK without an independent Environmental Protection Agency and weak governance is thought to have cost over £1 billion. The EU is currently responsible for monitoring the implementation and enforcement of environmental law and can investigate complaints from citizens and take action, including issuing fines, where environmental legislation is not being upheld. Post Brexit, we will lose the governance role played by the EU institutions. Appropriate environmental oversight and enforcement needs to be one of the key issues addressed in the consultation paper and subsequent DUP Policy. In terms of the creation of new oversight bodies to address the issues outlined above, we suggest that in Northern Ireland we establish:

- A new body to replace the role of the EU institutions in environmental governance (either a separate NI body or part of the wider UK Office for Environmental Protection) but it must coordinate with corresponding bodies in the other UK countries and the Republic of Ireland.
- An independent Environmental Protection Agency

Theme 3: Decarbonisation of the Economy

We are generally content with the four sub-themes as listed. However, we believe the DUP should support the current UK Net Zero Target by promoting behavioural change in Northern Ireland. Northern Ireland must play its part and with no indication that voluntary climate reduction policies are having the desired affect, we need a Climate Change Bill for Northern Ireland with binding and enforceable targets. This section seems to focus mainly on technological innovation. A starting point in all the issues identified should be the reduction of CO₂ emissions through good practice and behavioural change rather than the sole pursuit of technological fixes on the basis that prevention is better than cure. Similarly the lack of a technological fix or the expense of adopting such a fix cannot equate to or justify a do nothing outcome.

3a) Energy and Heat Generation

It is important that the stated 'transparency in costs' includes an analysis of the subsidies provided to the fossil fuel industry as well as the risk of continued reliance upon the supply of imported coal and gas.

3b) Energy Efficiency

As well as encouraging individual behavioural change in relation to energy usage and wastage in the home and the promotion of green transport, a new policy must also encourage energy efficiency in new and existing buildings. We would advocate a re-analysis of the concept of a Green New Deal for Northern Ireland that promotes and invests, among other measures, renewable energy and the retrofitting of our existing housing stock.

3c) Transport

Our transport policy needs to be reviewed as it remains incompatible with the need to move towards a low-carbon economy and we need to challenge the policies that have created a car-dependant transport system. Transport infrastructure projects continue to be justified based on a narrow set of economic arguments, such as time savings for car and freight drivers. Other impacts such as social and environmental issues are sometimes considered, but rarely used as deciding factors. The social, environmental and economic cost of our continued focus on the private car is not best value for money. Much of the planned investment in roads infrastructure should be redirected to making roads safer and more attractive for walking, cycling and public transport. A more integrated, strategic, sustainable approach to transport is required to that currently being pursued is needed, particularly in relation to investment, which also promote and facilitate behavioural change. A more sustainable transport system can realise significant cross sectoral benefits in a number of key areas, including, human health and wellbeing, economic development, environmental protection and air pollution, energy security, social justice and mobility and integrated policymaking in Northern Ireland. Such an approach will help reduce greenhouse gas (GHG) emissions, in particular CO₂ emissions, within the transport sector in line with targets in the UK Climate Change Act and The Europe 2020 Strategy.

3d) Circular Economy

This section should contain support for initiatives that promote the Waste Hierarchy to encourage waste reduction, reuse and recycling and so reducing our reliance on landfill. In reference to the statement: *'Our solution has been to bury the problem of waste or export it to areas with laxer standards or enforcement creating environmental damage'*, it is worth remembering that the illegal "toxic super dump" at Mouboy (one of the largest illegal dumpsites in Europe) was facilitated by poor environmental regulation within Northern Ireland. The Mills Report into Mouboy stated: 'The

Regulatory Service in the NIEA needs to Change in order to become more integrated and adaptive' and that '*Currently the punishment does not fit the crime and the waste industry is extremely attractive and vulnerable to criminals who can make vast profits with relatively little risk*'.

Theme 4: Biodiversity and Habitat

This section seems to take a very piecemeal approach. For example, we are not sure why specific reference is made to protection of the Atlantic Ocean rather the need for increased protection of our entire marine environment. For example, a recent report from the Northern Ireland Marine Task Force found that a well-managed and ecologically coherent network of Marine Protected Areas for Northern Ireland's inshore region could be worth £54 million per annum¹. Similarly, while reforestation is to be welcomed, consideration must be given to the type of trees planted and the siting of these woodlands to avoid potential damage to certain habitats such as peatlands.

It is universally accepted that our society, economy and individual well-being depend upon a healthy natural environment. It underpins everything we collectively produce and consume and we rely on it for our food, energy, minerals, clean air and water.

Yet, Northern Ireland continues to fail to meet its local and international commitments to halt biodiversity loss. This claim is borne out by the publication of the State of Nature Report (NI) 2016 which revealed that locally:

- Over the long term, 52% of vascular plant species declined and 48% increased. This trend continued over the short term.
- 38% of bird species declined over the long term, while 62% increased. Over the short term, 58% of bird species declined and 42% increased.
- Over 1,400 species known to occur in Northern Ireland have been assessed using modern Red List criteria. Of these, 295 (20%) are at risk of extinction from the island of Ireland.
- Very little ancient woodland remains in Northern Ireland – it covers only 0.04% of the land area, compared to 2% in the rest of the UK. However, plantations of the non-native Sitka spruce have covered thousands of hectares and are responsible for the loss of large areas of upland blanket bog.
- Although much blanket bog remains, only 8% of lowland bog and 15% of upland bog is considered intact, due to drainage, overgrazing and, in particular, peat cutting.

Despite the publication of various Departmental strategies and policies (e.g. introduction of the NI Biodiversity Duty) the main threats to biodiversity in Northern Ireland remain:

- Habitat loss, degradation and fragmentation through changing and unsustainable land use and land management practices;
- Trade in plants and animals and globalisation of transport, leading to the spread of invasive alien species, pests and diseases;
- Eutrophication, nitrogen deposition and pollution of land and water; and
- Climate change, influencing the functioning of ecosystems.

We have missed our target of halting biodiversity loss in 2010 and 2015 and on the way to missing our 2020 targets as well. We need a new holistic and cross-sectoral approach to halting biodiversity loss

¹ Barnard, S., Burdon, D., Strong, J. & Atkins, J. (2014) The ecological coherence and economic & social benefits of the Northern Ireland MPA network. Report to the Northern Ireland Marine Task Force (YBB238-F-2014). Institute of Estuarine and Coastal Studies (IECS), University of Hull, Hull, UK, HU6 7RX.

in Northern Ireland, one that moves beyond high-level strategies to include action plans and the necessary resources to make it happen including commitments to ensuring funding for nature conservation to replace existing EU funding programmes such as LIFE+ and INTERREG.

Other Policy papers relevant to this work

We note the statement that the *'DUP will be developing a policy paper on future agricultural support policy therefore, the environment paper will not go significantly into this area'*. However, we believe these two policy areas to be intrinsically linked and impossible to separate.

Current agricultural policy has driven agriculture down an unsustainable path, with many of the declines in our natural capital (clean air, water, soil and biodiversity) as well as rise in GHG emissions, attributed to agricultural intensification.

We now need to seize the opportunity to develop new sustainable agriculture policies in Northern Ireland that are good for nature, fair to farmers and benefit society through the delivery of environmental public goods. Similarly, we need a nature-friendly marine and fisheries policy to support a truly sustainable fishing industry to protect our seas and marine biodiversity.