

PROGRAMME FOR GOVERNMENT FRAMEWORK, DELIVERY PLANS AND INDICATORS 29, 36, 37, 44 AND 45

Comments by
Northern Ireland Environment Link for the Committee
for Agriculture, Environment and Rural Affairs

9th January 2017

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 70+ Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

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

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

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Introduction

Northern Ireland Environment Link welcomes the opportunity to engage with the Committee on the Draft Programme for Government (PFG) Framework 2016-21. We commend the Executive for producing an outcomes-based PFG that seeks to set a positive vision for Northern Ireland as a place to live, visit, learn, work in, and enjoy. We are committed to continuing to work with the Executive to further refine the framework while assisting the relevant Senior Responsible Officers to develop comprehensive delivery plans which reflect the importance of the environment in delivering future prosperity and well-being. Before addressing specific components of the framework, it is worth highlighting a number of key points we made in our latest submission to the NI Executive:

- The framework would benefit from more linkages between Outcomes, reflecting the reality that environmental themes deliver under multiple Outcomes.
- It is imperative that the 6 indicators under Outcome 2 are retained, in particular we endorse the biodiversity indicator and, if necessary, an adjusted water indicator which can be assessed annually.
- The biodiversity delivery plan should include clearer actions to progress the natural capital concept. Further detail on the role of key partners could also be included.
- Climate change adaptation should feature more prominently in the narrative under multiple outcomes.
- The reference to circular economy needs to be imbedded in the main text of the framework and can contribute to the delivery of multiple Outcomes.

General Comments on the Framework

The environment is our health and wellbeing. It's our economic foundation. It's our food and water. It's our heritage and history. It's our future. It is appropriate therefore that one of the first framework outcomes is environmentally focussed. However, Outcome 2 could be revised to read: *'we live and work sustainably – protecting **and enhancing** the environment'*. This provides a more accurate reflection of the Outcome which seeks not only to protect and maintain what we have but becomes more aspirational in seeking to improve the state of our environment.

It is pleasing that some of the suggestions made by our sector have been incorporated in the latest draft. For example, the development of a natural capital index and forum. However, certain themes, such as climate change adaptation and resilience, circular economy and resource efficiency could be more prominent. There is also a need to draw stronger links between outcomes and for the framework to more effectively reflect the cross-cutting nature

of the issues. While Outcome 2 refers to many relevant environmental themes, other outcomes could more adequately recognise the role of the environment in their delivery.

The remainder of this response will outline how coverage of certain environmental themes can be strengthened throughout the framework, before providing comment on the relevant delivery plans.

1. UN Sustainable Development Goals

It is positive to note explicit reference to the UN 2030 Sustainable Development Goals under Outcome 2: *outcomes and indicators in the pfg will support the SDGs* However, the Sustainable Development Goals have relevance beyond the environment. This commitment should be set out at the beginning of the Framework. Furthermore, if the Framework is genuinely intended to support the delivery of the SDG's, the Goals could be referred to under each of the Outcomes. For example, on poverty Outcome 3 could refer to SD Goal number 1, on innovation and infrastructure Outcome 5, 6 and 13 could refer to SD Goal 9 and on education Outcome 14 could refer to SD Goal 4.

Outcome 2 appropriately mentions implementation of SD Goal 13 and the associated commitment to combat climate change and its impacts. However, the ambition is not matched by sufficient detail or cross-sectoral recognition of climate change adaptation and mitigation. Section two (below) outlines how the framework can more effectively incorporate climate related considerations. It is unclear why other Goals have also not been mentioned under Outcome 2, for example SD Goal 6 clean water and sanitation, SD Goal 7 affordable and clean energy.

We would encourage the Executive to more comprehensively outline how the PFG Outcomes and Indicators will contribute to delivery of the SDG's in Northern Ireland and how this will be implemented and monitored. The SDG's could be mapped onto the PFG Outcomes and an Action Plan for implementing the SDG's could be developed. It is also worth noting that given the current uncertainties created by Brexit, it may be that closer adoption an 'international' framework like the SD Goals, would provide an increased sense of confidence and connectivity.

NIEL provides the secretariat to the NI Open Government Network. The Network is embarking on a new UK-wide Big Lottery Funded project focussing on raising the profile and understanding around the UN SDG's. We would welcome the opportunity to work with the Executive on this Initiative.

2. Climate Change – Mitigation and Adaptation

Climate change is one of the most challenging global issues facing Northern Ireland and requires response from all parts of government to both mitigate and adapt to ensure the resilience of Northern Ireland.

The move towards a low carbon economy is fundamental if we are to build a more resilient economy. Therefore, we are calling for the Executive to deliver a Northern Ireland Climate Change Act that legislates for targets and policies to guide and ensure transition to a low carbon economy. As outlined in our previous response, such legislation could be incorporated in a Wellbeing of Future Generations Bill under Outcome 3.

The timeline of extreme weather and its impacts on Northern Ireland over the last decade demonstrates that we need to take resilience and adaptation to climate change seriously, and this could be reflected at the highest policy level. It is recognised under Outcome 8 that respondents advocated greater levels of community resilience in relation to *flooding* and *extreme weather events*. This is particularly important given the correlation between flooding vulnerability and economic disadvantage, as noted in the UK CCRA (2012). Yet little mention is given to these issues in the body of text under Outcome 8. Climate related resilience is key to well-being, and these inter-related concepts (resilience, flooding, extreme weather events) could be specifically mentioned as environmental considerations under Outcome 2. We welcome the inclusion of a new indicator under Outcome 2 on the percentage of water bodies at good status.

Resilience is a cross-cutting issue that must be incorporated in all aspects of government policy. Therefore, Outcomes 11 and 13 could be modified to acknowledge that resilience and adaptation is a very important part of planning the provision of both public services and infrastructure. Outcome 13 now states that there is a need for a detailed delivery plan. The Plan must be funded adequately and operate as a live, responsive plan which can take account of cross-departmental responsibilities for a cohesive approach to flooding in NI.

3. Natural Capital

In recognition that our prosperity is inextricably linked to the health of our Natural Capital, the inclusion of a commitment to develop a Natural Capital Index under Outcome 2 is encouraging. However, the delivery plan should give greater clarity around the planned actions. A Natural Capital Index should be developed as well as a 'Roadmap' with practical actions to effectively implement natural capital accounting and help inform better decision making at local level.

Outcome 2 rightly acknowledges that nature '*supports a broad range of other PFG outcomes, particularly those relating to economy, health and well-being and attractiveness as a place to live, work and visit*'. Therefore natural capital could be mentioned under Outcome 1

(economy), Outcome 4 (health) and Outcome 12 (a place to live, work, visit). Natural capital could also feature under Outcome 11 (public services).

4. The Historic Environment

Outcome 5 makes reference to the importance of an *'innovative, creative society'*, highlighting the positive impact of cultural engagement on wellbeing. Cultural assets such as the historic environment and heritage provide a unique opportunity to harness community-led regeneration and enable resilient and sustainable societies. The social impact of our culture assets and historic environment in particular, not only positively impacts on the confidence, capacity and quality of life of diverse communities but impacts specifically on health & wellbeing, social cohesion & shared space, social enterprise and tourism. Outcome 10 acknowledges the importance of the *'attractiveness of destination'* and the importance of our unique regional offer in increasing visitor numbers. Heritage-led regeneration and the historic environment enables opportunities to increase this unique tourism offer in terms of sense of place, while supporting innovation and economic development. *Tourism NI Annual Visitor Attraction Statistics 2015*¹ highlighted over 25% of the 17.5million trips made to local visitor attractions were to historic properties and sites. NIEA's *Study of the Economic Value of Northern Ireland's Historic Environment*² recognised the significant growth potential in heritage-related jobs. This potential has not been realised since the publication of that report, and NIEL recommends that the economic potential of both the natural and built environment is explored and supported, following the success of Scotland's example as a nation that has coupled their environment and heritage with jobs and prosperity. This potential could be specifically recognised under Outcome 6 (people working in better jobs).

5. Circular Economy Roadmap

The consultation document states that *'a number of respondents highlighted the importance of links between this Outcome [1] and Outcome 2, including in respect of the 'circular economy'*. However, there is no mention of circular economy in the main body of the text or under other relevant outcomes. While we appreciate that resource efficiency is mentioned in Outcome 2, the 'what we will do' section could include a commitment to develop a resource efficiency/circular economy roadmap for Northern Ireland to facilitate the transition from a linear to a circular economy. Furthermore, efforts could be made to weave these concepts into other relevant Outcomes. For example, in relation to Outcome 5, the move towards a circular economy, with associated research and innovation, can provide new market

¹ <https://www.economy-ni.gov.uk/publications/annual-tourism-statistics-publications>

² http://www.nienvironmentlink.org/cmsfiles/policy-hub/files/documentation/Built/study_of_the_economic_value_of_ni_historic_environment_may_2012.pdf

opportunities for recycled products in Northern Ireland and deliver multiple benefits to society: business growth, jobs, reduced waste to landfill and lower greenhouse gas emissions.

6. Environment as a Preventative Health Measure

Outcome 4 makes reference to the influence of '*physical environments*', the prevalence of '*environmental disadvantage*', the need to facilitate '*healthier lifestyles*' and the need for '*actions to improve the physical environment*'. In order to ensure these comments become more than tokenistic sentiment we would like to see a concrete commitment to an environmentally centred preventative approach to the health of the population. For example, the introduction of innovative approaches such as 'Green Prescriptions', whereby healthcare professionals fund the delivery of pilot projects around prescribing nature related activities to tackle mental and/or physical health. A meaningful commitment under Outcome 5 would encourage follow through in the relevant delivery plan.

7. Marine

The quality of inland and marine waters is highlighted as an area of significant importance. Outcome 2 recognises that they could be managed in an integrated and long-term manner with full stakeholder input. However, the targets listed to improve water quality relate to obligations under the EU Water Framework Directive (WFD) and therefore addresses inland, transitional and coastal waters only. Improved water quality for the marine environment (i.e. inshore waters out to 12 nm) should be included within the PfG to fully achieve this outcome.

We recommend including a continued commitment to implement the EU Marine Strategy Framework Directive (MSFD) as a means to achieve improved water quality for the marine environment. Actions related to achieving this outcome could include (a) implementing the Programme of Measures to achieve Good Environmental Status of our seas (b) establishing an ecosystems-based Marine Plan for Northern Ireland (c) completing a network of Marine Protected Areas with fully developed and enforced management plans.

8. The Environment and Education

Under Outcome 14 we encourage explicit recognition around the role that environment and heritage can play in formal and informal education to give children the best start possible in life. UK and international research has demonstrated that outdoor and environmental education has multiple benefits for children, sometimes in surprising ways. Environmental education has been shown to:

- Improve academic performance across the curriculum including numeracy, literacy and STEM activities

- Encourage children to transfer and apply skills learned in the classroom, and lets them gain skills to tackle future environmental issues facing Northern Ireland
- Increase equality of opportunity for children from all backgrounds
- Improve discipline in the classroom
- Bring inherent health and wellbeing benefits to children.

NIEL recommends the continued development of the Eco-Schools programme, recognising schools as beacons of sustainability within their communities. We would also like to see joint working between DAERA and the Department of Education in terms of realising the potential of the environment to the education system in Northern Ireland, with the aspiration of an 'Environmental Education Strategy' that promotes an expectation of outdoor learning and fieldwork. To help encourage a greater connection to nature for our children, we are asking the Executive to embed outdoor learning in the natural environment into the NI Curriculum and support this requirement through Teacher Training and continuing professional development.

The successful eco-schools concept could be extended to include eco-villages through adoption of the One Planet Development policy, as pioneered by the Welsh Assembly. The Enriched Earth Ecovillage model offers a best practice example of how to "live and work sustainably".

Indicators and Delivery Plans

We are broadly satisfied that the indicators cover a range of environmental themes (biodiversity, air quality, transport, water, waste and air quality). Given the delivery plans are live documents, ongoing engagement with the eNGO sector is vital to help refine the proposed actions and develop robust delivery plans. Specific comments on indicators 29,36, 37, 44 and 55 and the related delivery plans are set out below.

Indicator 29: Greenhouse Gas Emissions

The Delivery Plan could include an action to consider a **Northern Ireland Climate Change Bill** to legislate for targets and policies to guide and ensure transition to a low carbon economy. As outlined in our previous response, such legislation could be incorporated in a **Wellbeing of Future Generations Bill**.

Indicator 36: % household waste that is reused, recycled or composted

The delivery plan should include an action to develop a **resource efficiency/circular economy roadmap** for Northern Ireland identifying short, medium and long-term priorities to facilitate the transition from a linear to a circular economy.

The Action Plan for the Circular Economy is a key pillar of the European Commission's 2017 Work Programme³. While the outcome of Brexit is unknown, Scotland and Wales have already embedded the Circular Economy at the heart of delivering many of the Outcomes in their respective Programmes for Government.

Indicator 37: Annual mean nitrogen dioxide concentration at monitored urban roadside locations

This delivery plan would benefit from the inclusion of more practical actions aimed at reducing the number of cars in urban areas. For example, expansion of park and ride schemes, facilitating *cycle* and ride by providing incentives for rural dwellers to buy power assisted bicycles, promoting home working and ensuring that buses and trains are replaced with low, and preferably zero, emission vehicles. Cities such as Paris have even resorted to banning cars from the city centre in order to address air quality. We would encourage government to be bold and ambitious in attempting to deliver improved air quality. Incremental changes are unlikely to achieve the desired effect in turning the curve.

Indicator 44: % water bodies at 'good' status

NIEL strongly supports the inclusion of this indicator with mid-term reporting (3 years). This indicator aligns with European policy under the WFD and is an internationally recognised reporting standard. If this indicator is not permitted due to annual reporting requirements, we would support the inclusion of alternative indicators around phosphorous levels in terrestrial water bodies and dissolved nitrogen levels in marine waters. However, we would be concerned that such a chemical assessment would fail to consider the wider ecological condition of water bodies. Furthermore, if these new indicators are adopted it is important to ensure that other aspects of monitoring are not neglected and that resources are not diverted towards a very narrow set of short-term actions, at the expense of working towards delivery of the WFD targets. WFD standards must continue to apply post-Brexit and a revised PFG indicator should not detract from this.

The delivery plan⁴ (page 10) would benefit from more practical actions to be delivered 'on the ground', that will contribute to improved water quality. Furthermore, delivery of the Long Term Water Strategy should be inserted into the table (page 6) under the role of the Department for Infrastructure and reference to the sustainable land management strategy (page 10) needs updated.

³ http://ec.europa.eu/atwork/pdf/cwp_2017_en.pdf

⁴ <https://www.northernireland.gov.uk/sites/default/files/publications/newnigov/dp-water-bodies-at-good-status.PDF>

Indicator 45: Biodiversity

NIEL supports the inclusion of this indicator given that biodiversity and natural capital provide the foundation of our life support system. The delivery of the biodiversity indicator is not solely within the remit of DAERA. Therefore, the table on page 8 and 9 of the biodiversity delivery plan should detail more extensively the role of other Departments in delivering the biodiversity indicator, some examples of which are given below. Biodiversity is critical to delivering a range of other PFG outcomes, particularly relating to the economy, health, well-being and attractiveness as a place to live, work and visit.

NIEL strongly supports actions around the development of the natural capital approach. However, the last line on page 11 *'the development of natural capital will be achieved'* reflects the lack of clarity throughout the plan as to how the natural capital approach will be pursued and delivered. We propose three clear actions that are directly relevant to the delivery of the indicator but will also provide the foundation for the development of a more robust 'natural capital' indicator in future Programmes for Government:

- Establish a NI natural capital forum at the earliest possible convenience bringing together cross-sectoral expertise to guide the natural capital agenda
- Establish the Natural Capital Index
- Explore and outline a roadmap for delivery of natural capital accounting within government and relevant sectors (to be implemented in the next PFG)

The table on page 9 and 10 of the biodiversity delivery plan could provide more detail on the role of key partners. For example, the Department for Infrastructure (DfI) is responsible for Development control functions which ensure that planning policies provide the necessary safeguards and that regionally significant planning decisions have due regard to the particular needs of protected sites; NI Water owns and manages significant areas of land within the protected site network; and District Councils play a key role in protecting designated sites and features through development control, delivery of Local Biodiversity Action Plans and a General Duty to manage council owned lands within ASSIs.

NIEL welcomes the recently published agricultural land management strategy which, if funded adequately, could help adapt farming practices for the betterment of the environment. However, the proposals are specific to the agriculture sector. Therefore, there is still a need to establish an overarching vision and holistic set of principles to strategically guide land use decisions in Northern Ireland. NIEL would like to see the Delivery Plan include a commitment to works towards (or at least explore) the development of a Land Strategy for Northern Ireland. The Land Matters Task Force (LMTF) produced a scoping report entitled *'Towards a Land Strategy for Northern Ireland'*. The report details specific recommendations for a

Northern Ireland Land Strategy and includes a vision, rationale and set of overarching principles. The Land Strategy proposal gained cross-sectoral and cross-party political support during the last Assembly mandate. Such a strategy would provide a more holistic approach to biodiversity conservation, developing connectivity and helping to ensure that biodiversity targets are not pursued in isolation from wider landscape scale considerations. During the last Assembly mandate the LMTF received cross-party support, as well as endorsement from the Environment Committee and the Environment Minister for the development of a Land strategy. LMTF has requested a meeting with Minister McIlveen to explore how this important policy can be progressed.

Conclusion

NIEL welcome's much of the content set out in the latest iteration of the PFG framework. Considering the environment provides the essential goods and services upon which our future prosperity depends, it is encouraging to see recognition given to the environment. However, we are strongly of the view that if the Programme for Government is to deliver the environmental aspirations outlined in Outcome 2, and indeed many of the ambitions laid out under other Outcomes, then the environment needs to be reflected more prominently under other Outcomes. Specific instances where such cross-linkages can be made, have been identified throughout this response. A failure to do so will result in the continuation of a prevailing paradigm which treats the environment, economy and society as competing rather than complementary issues.

We look forward to working with the Executive to further refine the framework, while assisting with the development of delivery plans and associated targets/actions to ensure progress towards the delivery of the PFG indicators.

We would be available to engage further with the AERA Committee on both the Programme for Government and the wider forward Work Programme.