

# Environment Strategy for Northern Ireland

Public Discussion Document

Stakeholder Response Template



September 2019

*A living, working, active landscape valued by everyone.*



Department of  
**Agriculture, Environment  
and Rural Affairs**

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## How to Respond

This template replicates the questions posed in the online survey on the Environment Strategy for Northern Ireland Public Discussion Document found at: <https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document>.

However, while the online survey includes additional information to assist respondents, the full text of the consultation can only be found on the Department's website by following the link above or by contacting us to request a hard copy. It is recommended that you should read the full consultation document before completing your response, whether you choose to use this template or the Citizen Space Hub.

If you wish to use this template for your response, please reply by e-mail or hard copy respectively to:

[esni@daera-ni.gov.uk](mailto:esni@daera-ni.gov.uk)

*or*

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Early responses are encouraged but all responses should arrive no later than **5pm on Monday 23<sup>rd</sup> December 2019**. Before you submit your responses please read the "Freedom of Information Act 2000 - Confidentiality of Consultation Responses" section below, which gives guidance on the legal position.

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The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can refuse to disclose information only in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

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- the Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature;

- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses, please contact the Information Commissioner's Office:

Tel: (028) 9027 8757

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## ABOUT YOU

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Please note that the text boxes used throughout this template will expand to accommodate your response – there is no character limit.

**Q1: Do you agree that the Environment Strategy should sit alongside existing Executive-endorsd strategies, such as the Sustainable Development, Public Health and Economic Strategies?**

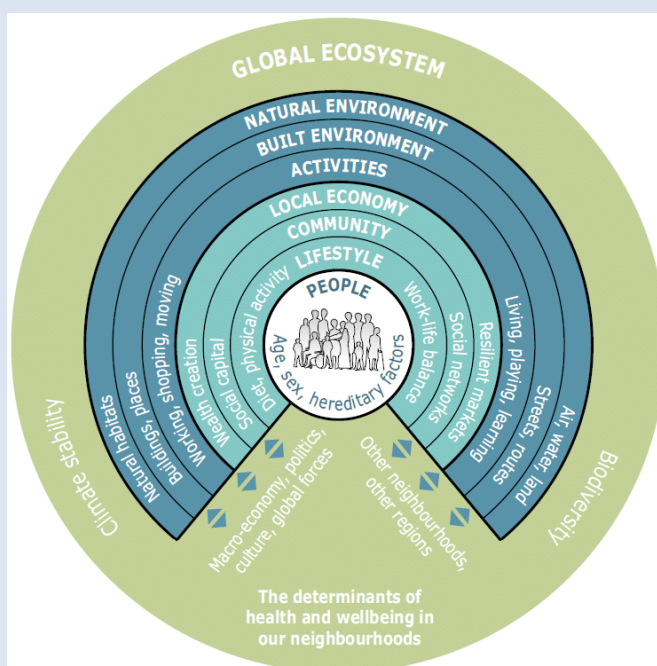
Yes ☒

No ☐

### Comments

NIEL believes that the importance of the Environment Strategy should be at the very least, on par with other Executive endorsed Strategies.

The importance of the environment as a factor that underpins our health and wellbeing is best summarised in the diagram below entitled *The Determinants of health and well-being* and is, we believe, the context upon which the entire proposed Environment Strategy should be based.



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).

Our environment, which is essential to future prosperity and well-being, has never been under more pressure: biodiversity is in decline, air and water quality remains poor and climate change is impacting upon all areas of life.

Effective delivery of an ambitious long-term Environment Strategy help reverse the decline and then, critically, should set Northern Ireland on a new path of renewal and environmental regeneration.

While we support an Executive endorsed strategy, the lack of a functioning Executive must not be used as a reason for failing to progress an environment strategy. Given the urgency

of the situation, in the absence of an Executive, other mechanisms for progressing the Strategy must be found regardless of political circumstances.

Before commenting further on the content of this Discussion Document, NIEL believes that any future Environment Strategy for Northern Ireland must be based on the following principles. The Strategy must:

- Have clear lines of accountability. All government Departments and public bodies should be included in the design not just of the strategy but the crucial actions that need to be clearly set out within it; and should have a pro-active duty to implement it and be held accountable for the impacts of decisions taken.
- Be independently monitored with clear mechanisms to hold government to account.
- Have statutory footing and binding targets that are clear, measurable and ambitious and in line with/contribute to the achievement of the UN Sustainable Development Goals. Effective environmental governance is essential for any framework of environmental policy; a strategy that is not backed up in law with effective enforcement mechanisms is essentially no more than a wish list.
- Be matched by appropriate and significant additional direct investment to enrich our environment and land/sea resource and a commitment that future public payments are directed towards delivering public benefits.

In addition, we believe it is fundamental to the future of Northern Ireland that:

- An Environment Bill for Northern Ireland is enacted to give the Environment Strategy a binding, legal footing. Failure to do so will mean the document will lack ‘teeth’ and remain largely ineffective along with a host of other strategies such as the NI Sustainable Development Strategy and the NI Biodiversity Strategy. It could be argued for example that if our Sustainable Development Strategy had been backed up by legislation, our environment would not have been in its current poor condition. Without legislation the state of our environment will continue to decline.
- An Independent Environmental Protection Agency (EPA) is established. Northern Ireland remains the only part of these islands without an EPA. We need an EPA to ensure independent and robust monitoring and appropriate mechanisms to hold government to account.

**Q2: Do you agree that these broad environmental areas are appropriate for the Environment Strategy?**

Yes ☒

No ☒



## If "No", what alternatives would you like to see included?

Review of Planning legislation and in particular 'Permitted Development Rights', the introduction of third party rights of appeal and changes to the conditions under which retrospective planning permission can be given.

Government needs to tackle the issue of unintentional or deliberate misuse of permitted development rights (PDR) in the countryside. Clarification needs to be provided as to when the use of PDR is allowed and when a planning application is required. If the issue of PDR continues to be interpreted incorrectly, consideration should be given to changing what is currently allowed. Government also needs to tackle the issue of development without planning permission and the extremely high success level of applications for retrospective planning permission.

While the value and importance of outdoor recreation are acknowledged in the Discussion Document, unfortunately, the rest of the document contains little by way of analysis or elaboration of this theme compared to other topics.

Under 'Built Environment', there is reference to 'heritage buildings and monuments'. Given the nature of the NI landscape and the historical intertwining of natural and historic environment, there should be more attention on the historic environment including archaeology. For this Strategy to succeed it requires a partnership approach across Government, and is particularly relevant to the Historic Environment Division.

## Other Comments

We welcome the inclusion of the marine environment in this section given the importance of our seas and coasts, which support more than half of Northern Ireland's biodiversity, and fully support the Northern Ireland Marine Task Force response, which addresses marine and coastal elements of the public discussion document.

While we agree with the broad environmental areas listed, we would like to make the following additional comments:

- We agree with the assertion that environmental issues do not respect borders and believe that the island of Ireland and its surrounding seas represent a single biogeographic unit with shared land and sea borders. Therefore, to effectively address these issues we must do so on an all-island basis which will require on-going and close cross-border cooperation at a departmental, local authority and community level.
- We note the sentence on P15 stating '*Linking the Environment Strategy to appropriate international standards, such as the UN Sustainable Development Goals, may also be desirable*'. For NIEL, the linking of the Strategy to the SDGs should be mandatory not optional. The UK government has signed up to delivering the SDGs and Northern Ireland is required to contribute to the UK reporting process. We believe all future NI Departmental Strategies and Policies (including Programmes for Government) must help deliver on our commitment to implementation of the SDGs, and so a SDG Implementation plan for NI with specific indicators must be developed. By using the SDG model it should be easier to progress/implement the Environment Strategy, even in the absence of a NI Executive, as it does not require a new



approach/departure from previously agreed Government policy. Also, if framed around the SDGs, the Environment strategy could be used as an SDG reporting mechanism.

- While agreeing with the statement that *'For a high-level environment strategy to be meaningful it is essential that it is ambitious in terms of its breadth and depth'* We would argue however that for the Strategy to be meaningful it must have:
  - **Legally-binding environmental objectives** for biodiversity, water, air and natural assets, each with a delivery strategy, timeline and milestones.
  - **Green investment** ensuring public and private money supports greener towns, countryside and seas.
  - **Accountability across government and the private sector** applying the polluters pays principle and ensuring government and businesses are held to account for their environmental record.
- Similarly, we agree that the Strategy must contain ambitious goals/ targets. To ensure this is the case and in order to make a real difference each objective must:
  - Have SMART (**S**pecific, **M**easurable, **A**chievable, **R**ealistic & **T**ime-bound) goals and targets to ensure they were measurable and time bound with clear milestones.
  - New and avoid being merely repeats of existing commitments already made in other policy or agreements that we are currently failing on
  - Be 'world leading' if we are to meet the ambition set out on P21 that, *Northern Ireland will also have a key leadership role in demonstrating to the rest of the world what is possible.*
- If the Strategy is to 'make a difference to the lives and wellbeing of this and future generations' it will need to remain a 'living' document in that it must be able to respond to new and emerging environmental challenges and allowing for periodic review.

### Q3: Do you agree that these are appropriate strategic themes for the Environment Strategy?

Yes ☒

No ☐

If "No", what alternative or additional themes/issues would you like to see in the strategy?

### Other Comments

**Q4: Do you have any comments on what specific issues should be included under a proposed Environmental Engagement strategic theme?**

Changing the attitude of society to the environment is crucial to the long-term prosperity of Northern Ireland. Research has shown that outdoor and environmental education has multiple benefits for children. Schools can be seen as drivers of sustainability at the heart of their communities, promoting a culture of 'learning together'. Engaging adults in informal lifelong learning using the outdoors also brings a range of benefits. 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
- Bring inherent health and wellbeing benefits to children and adults

It is crucial therefore that a joint Department of Agriculture, Environment and Rural Affairs, and Department of Education 'Environmental Education Strategy' is developed for Northern Ireland, which promotes an expectation of outdoor learning and fieldwork both within the curriculum and through lifelong learning. Consideration should be given to establishing statutory minimum requirements for outdoor learning and fieldwork within all stages of NI curriculum and teacher training.

A section is also required on outdoor recreation under the theme of Environmental Engagement.

We believe the issues, target groups and proposals listed under this theme can be categorised as achieving Behavioural Change in relation to our interaction with the environment. Behaviour change at all levels, in government, in business and in individual decisions and actions, are critical to the success of all the significant changes required to protect and, where needed, restore our environment for current and future generations.

As such this theme could include measures such as:

- Establishing a behaviour change knowledge resource in NI to:
  - Summarise/ disseminate research appropriate for use by government/ eNGOs
  - Support effective and consistent organisational communications with the public
  - Drive public behaviour change in line with necessary changes to business models.
- Carry out local research to ensure suitability of findings elsewhere for NI culture and norms.
- Engage the public, including young people, when deciding on the priorities for which behaviours need to change.

- Encourage and support experimentation to test innovative behaviour change approaches.
- Grow opportunities for young people to take action on the environment and nurture and encourage the next generation of environmentally responsible citizens
- Engage in in-house behaviour change campaigns and support expansion across government departments where success is proven. Expect the same approach from recipients of departmental funding.
- Introduce an environmental 'engagement index' to act as a baseline measure to determine future progress.
- Improved collaboration between NI Statistics Research Agency, NIEA and NGO's (NIEL) to ensure environment-focused questions in surveys (e.g. Continuous Household survey), are designed to produce the most appropriate, usable and visible data.
- Consideration should be given to communication techniques, and particularly the usability of the DAERA website
- Behavioural change for 'business' is crucial; DAERA should review current mechanisms for engaging with business, including Prosperity Agreements
- DAERA should adhere to best practice with regards to Open Government principles, including Open Data, when engaging with the public
- Environmental Engagement in NI needs to fully align with requirements under the Aarhus Convention, which:
  - Links environmental rights and human rights
  - Acknowledges that we owe an obligation to future generations
  - Establishes that sustainable development can be achieved only through the involvement of all stakeholders
  - Links government accountability and environmental protection
  - Focuses on interactions between the public and public authorities in a democratic context.

Finally, it is worth noting that the key behavioural change that has helped fund many existing environmental initiatives has been the introduction of Plastic Bag Levy legislation.

**Q5: Do you have any comments on what specific issues should be included under a proposed Environmental Prosperity strategic theme?**

NIEL agrees with the statement (P19) that *'There is a tremendously close, some would say symbiotic, relationship between the environment and the agri-food sector, each with the potential to significantly impact the other'*. We must ensure therefore that environmental and agricultural policies are not developed in isolation from each other and with often competing visions. Failure to integrate policies can result in major long-term negative implications for the environment such as those resulting from implementation of the Going for Growth Strategy which saw a drive to expand the agri-sector in order to grow sales by 60% without due regard to the environmental implications. We therefore endorse the recommendations of the 2019 Food, Farming & Countryside Commission Report *Lay of the Land* (Northern Ireland). This Report outlines the need for a 'transformation in our food and farming system in order to respond to the climate emergency and restore biodiversity,

improve the public's health and wellbeing in all communities and develop Northern Ireland's distinctive pattern of farming to play its full part in responding to these challenges, supporting and revitalising rural communities'.

Development of a Land Use Strategy for Northern Ireland which enables landowners, individuals and communities to make the best use of our land and landscapes should therefore be a key outcome of the Strategy. A Land Use Strategy could facilitate a strategic approach to land management and could help alleviate land use conflicts and ensure that land continues to provide goods and services to society while minimising adverse impacts on the natural resource (land) base.

We believe, the environment and the economy can deliver prosperity for society, hand-in-hand. Northern Ireland's available natural and cultural resources represent what we have 'in the bank', in terms of nature and what the environment delivers for society. We need to protect that long-term investment, ensuring that society 'lives off the interest' rather than eating in to, and depleting, our irreplaceable 'Natural Capital'. The Environment Strategy must ensure the development of policies that explicitly recognises the relationship of environment and prosperity, producing a Natural Capital Index for Northern Ireland.

#### Other comments

- The document notes the importance of the environment and heritage for tourism. NI needs a strategy/action plan aimed at developing the natural heritage tourism product
- There are obvious opportunities for economic regeneration in the built environment; there are many historic buildings lying vacant or languishing in the 'Heritage at Risk NI' list which should be prioritised for restoration; these could be repurposed for community and economic benefit
- A 'Green New Deal' must be included in the Strategy; Government should revisit the detailed proposals for a Green New Deal that eNGOs have previously submitted; as with other actions, cross-Government partnership will be essential.

**Q6: Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?**

Climate Change NIEL believes that if we are to have ‘*a key leadership role in demonstrating to the rest of the world what is possible*’, we must first address the main issues in relation to climate action in which we lag well behind:

- A Climate Emergency must be declared across all of Northern Ireland
- Given the urgency of the situation and with countries around the world committing to taking action, it is unacceptable there is no specific climate change legislation in Northern Ireland. Legislation for climate change in NI would allow specific policies to be developed to meet emissions targets and adapt our environment to the risks. NI Climate Change Legislation should include:
  - Emissions reduction targets based upon the most recent scientific evidence and at least matching UK legislation and that in other UK jurisdictions;
  - Interim targets and carbon budgets (over five-year periods);
  - Creation of a NI Committee on Climate Change (similar to UK Committee)
  - A clear target to decarbonise our energy supply and achieve net zero carbon emissions by 2045.
- Climate Change Adaptation urgently needs to expand, with more attention on reaching the sectors which will be most affected; in particular there should be more focus on local government

Resource Efficiency & Circular Economy The Northern Ireland economy needs to move away from the largely linear system on which it is based and its reliance upon our finite resources. We believe the Strategy needs to:

- Tackle the consumption issue (which is ethical as well as environmental) and work towards a circular economy for Northern Ireland.
- Ensure a holistic approach to the circular economy, including smart regulation, market-based instruments, research and innovation, incentives, measures of performance, and information exchange.
- Build Northern Ireland’s clean green image as an attractor for inward investment, recognising the economic and tourism potential inherent in our natural and cultural heritage - demonstrating that Northern Ireland remains committed to delivering our targets for emissions, waste, recycling, and energy efficiency.

Improving the efficiency of resource use and ensuring that waste is valued as a resource can contribute to reduce dependency on importing raw materials and help the transition to more sustainable material management and to a circular economy model.

Sound and efficient waste management systems are an essential building block of a circular economy. In Northern Ireland there is growing understanding and ambition to work towards creating a prosperous circular economy, creating more opportunity for sustainable consumption and production, including increased economic activity and job creation.

This Environment Strategy must enable citizens and economic activity to prosper through clear and action-led commitment. This includes following up on cross-departmental recommendations made for increasing circular economy activity within and by government both directly and through policy development.

Furthermore, the Strategy must ensure NI's circular economy policies align with objectives of the EU Circular Economy Package and so will help to provide:

- Waste prevention and resource efficiency overall
- Effective management of plastics
- Creation of economic opportunities along the supply chain
- Adequate provision to monitor and evaluate impact and benefits
- Improved citizen awareness and commitment through behavioural change interventions and effective communication
- Reduction of marine littering

Develop and implement policies that work across all government departments to promote the development of a circular economy and realise the economic benefits and opportunities this can provide. This will depend upon not merely sufficient dedication of financial resources but also capacity building across all sectors.

**Q7: Do you have any comments on what specific issues should be included under a proposed Environmental Quality strategic theme?**

We would broadly agree with the issues proposed under the Environmental Quality strategic theme. However as previously stated, the Strategy must contain ambitious goals/ targets for these issues. To ensure this is the case and in order to make a real difference each issue (Air, Water Quality, Biodiversity etc.) must be:

- Accompanied by SMART goals and targets to ensure they were measurable and time bound with clear milestones.
- 'New' and avoid being merely repeats of existing commitments/targets already made in other policy or agreements that we are currently failing on. We have for example failed to meet our target of halting biodiversity by the previously agreed date of 2010, 2015 and we are well on our way to failing to meet our 2020 target. Therefore, merely identifying a further date without ambitious and enforceable compulsory targets is likely to achieve the same poor results.
- 'World leading' if we are to meet the ambition set out on P21 that, *Northern Ireland will also have a key leadership role in demonstrating to the rest of the world what is possible.*

Some additional specific comments on this section

- While P25/26 rightly states that '*designation and management of our protected sites is a key tool in our efforts to halt biodiversity loss on land and sea*' it needs to be acknowledged that to date resources/efforts have primarily been directed towards designation rather than management as evidenced by the poor condition of our designated sites. Ambition needs to be raised beyond 'halting' biodiversity loss to 'halting and reversing' biodiversity loss given the current depleted state of wildlife in Northern Ireland. There is need for an ambitious and well-resourced Environmental Recovery Plan to be developed which can translate the Strategy into action commensurate with the scale of the challenge.

- There is a dearth of reference/ measures in relation to landscape and landscape quality throughout the document and in this section in particular in comparison to land quality. The Environment Strategy needs to give attention to institutional, policy, legislative and resourcing arrangements with regard to landscapes. The contrast between the welcome aspiration to manage our quality landscapes well to deliver both landscape quality and landscape scale eco-system goods and services and the weakness of current arrangements remains an on-going issue. Failure to do so means that the Strategy is unlikely to help deliver the DAERA's vision of "A living, working, active landscape valued by everyone".
- Although the document rightly identifies agricultural run-off as the main cause of poor water quality, the issue of mis-connections and cumulative impact of pollution from defective septic tanks also need addressed within the strategy.
- While referencing the issue of dilapidated and unsightly buildings and structures, the strategy should also ensure we do more to protect and maximise the return from our architectural heritage.
- Given the level of the litter problem in our urban areas and wider countryside, it is inexplicable that 'we do not yet have a litter strategy'.
- An additional area worthy of inclusion in the Environment Strategy is light pollution. It is a growing problem, given the diminishing number of 'dark skies'. As well as the impact on nocturnal animals, there are other issues relating to the energy costs of lighting the countryside - roads, floodlit houses etc.

#### Q8: What do you see as the main environmental governance priorities for Northern Ireland?

We note the statement on P30 that *'While there is support for an independent agency, responses to the most recent discussion document on environmental governance indicated a widely held view amongst stakeholders that the focus should be on environmental outcomes rather than simply changing delivery structures'*. We would however contend that multiple independent reviews of Environmental Governance in NI over the last twenty years concluded that an independent EPA should be introduced here as a matter of urgency. The most recent Report: [Northern Ireland: Challenges and opportunities for post-Brexit environmental governance](#), concluded that the region is lagging behind the rest of the UK, experiencing 'the relegation of environmental concerns down the list of political imperatives'. The Report goes on *'Common issues include the lack of an independent environmental agency, the absence of an environmental audit committee in the NI Assembly, and the lack of a specific environmental tribunal or at least environmental experts within the judiciary and prosecution services.'* It also highlights the need for:

- A separate environment commissioner to be appointed who can participate in a UK-wide environmental watchdog.
- Common UK environmental frameworks to be created which must be sufficiently flexible to accommodate continued cooperation between Northern Ireland and Ireland on a North/South basis under the umbrella of the Good Friday/Belfast Agreement. Central to this needs to be agreement on minimum standards of environmental protection, objectives and principles as well agreement on non-regression from current common standards.



We are deeply concerned about the risk of environmental governance in Northern Ireland being further weakened once we leave the EU and no longer have the oversight and enforcement of the EU institutions. Ideally, we would want to see a new governance body co-owned and co-designed by the four countries of the UK that would have jurisdiction in all four countries.

Given the lack of alternative options for Northern Ireland, the only practical approach is for the OEP to be extended to cover Northern Ireland. However, we believe that this should be done on the basis that the OEP will apply to NI *until* a Minister is in place, when they can then decide whether to continue with this arrangement or present alternative proposals for Northern Ireland. Waiting until *after* a Minister is in place risks leaving Northern Ireland with significantly weaker environmental governance when we leave the EU.

We would appreciate clarification on the thinking behind the statement on page 31 of the discussion document that *"Should a future Minister decide that the functions of the OEP should extend to Northern Ireland, it would not replace any of NIEA's duties or responsibilities"*, as it is not clear if and why this might be the case.

The situation will be even more urgent if we leave the EU without a deal and there is no transition period. The UK Government is developing some interim arrangements for England that would apply until the OEP is set-up but there are currently no plans for these to apply to Northern Ireland.

DAERA should either request that these interim arrangements apply to Northern Ireland as well or develop alternative interim arrangements for NI. We believe that relying only on current arrangements (i.e. civil society applying for judicial reviews) will not be sufficient to provide adequately strong environmental governance for Northern Ireland after Brexit.

Regardless of what measures are put in place to replace the EU governance structures, we believe there is still a need for an independent EPA in Northern Ireland.

**Q9: Do you agree that these are appropriate draft outcomes for the Environment Strategy?**

Yes ☒

No ☒

**If "No", what alternative or additional outcomes would you like to see?**

Additional outcomes could be:

- To significantly reduce/ halt wildlife and environmental crime.
- A minimum requirement set for outdoor education time for every child.

**Other Comments**

We are generally content with the 6 Draft Outcomes listed, however:

- We endorse the National Outdoor Recreation Forum (NORF) call that the existing outcome “Everyone can access and is connected to a healthy environment” is strengthened to “We have well managed landscapes and high quality urban spaces that are accessible to everyone.”
- The Strategy must set deadlines for these to be achieved otherwise they will remain an open-ended wish list. As previously stated objectives, targets and outcomes should be legally binding and underpinned by shorter-term targets, with appropriate resources and indicators to measure progress.

#### **Q10: What are your big ideas for the future protection and enhancement of the environment?**

Listed below are a number of ‘big ideas’ proposed by NIEL and our members along with a range of ideas emerging from a cross-sectoral workshop we held in association with NICVA on the Environment Strategy document. Please note these ideas are in addition to our call for the proposed Environment Strategy to have a legislative footing and the need for an independent EPA as outlined in response to Question 1. These additional ideas are not listed in order of preference and are all worthy of consideration:

- A Climate Change Act for NI with: Reduction Targets in line with UK legislation and other UK jurisdictions; Interim targets and carbon budgets (over five year periods); Creation of a NI Committee on Climate Change (similar to UK Committee on CC).
- All future NI Departmental Strategies and Policies (including Programmes for Government) must help deliver on our commitment to implementation of the UN SDGs with: A SDG Implementation plan for NI with specific indicators; Compulsory incorporation of the SDGs into the local council community plans; Appointment of SD champions in each government department; and the Executive Office responsible for the implementation of and reporting on the (SDGs) to ensure the integration of SDGs into government policy across all government departments.
- Creation of a NI Well-Being of Future Generations Act based on the Welsh example to improve our social, economic, environmental and cultural well-being, and to contribute to the achievement of the SDGs, along with the appointment of ‘Future Generations Commissioner’ to make sure public bodies are working towards well-being goals and produce an annual report.
- Creation of a NI Environmental Citizens Advisory panel to improve levels of citizen information, engagement and participation in the design of environmental policies and strategies that affect NI. There could also be the option of future development into a cross-border environmental citizens advisory panel tasked with exploring an island-wide environment response as the protection and management of the environment on the island of Ireland, from our rivers, seas, air, waste and wildlife, requires cross-border collaboration and affects all citizens.
- Creation of a ‘Nature Recovery Network’ – A nationwide map for nature - a spatial plan that identifies and creates the corridors and areas of habitat wildlife needs to move in

order to recover. It will connect wild places and provide space for wildlife to recover and thrive. To do so will mean putting space for nature at the heart of our farming and planning systems.

- Sustainable agri-food Sector Support: the document acknowledges the importance of agriculture for our environment and that how we farm can have positive and negative effects but this concept is not developed further. In order to help farmers combat climate change and restore nature in our countryside, farming subsidies should provide an incentive for farmers to farm in a way that helps protect the environment and support the objectives of the Strategy. This should be progressed through a 'Public Money for Public Goods' approach. We believe that the entire Strategy needs to be matched by appropriate and significant additional direct investment to enrich our environment and land/sea resource and a commitment that future public payments are directed towards delivering public benefit.

#### **Q11: Do you have any other comments or contributions?**

We would like to see the inclusion of measures/ targets to reduce wildlife and environmental crime. As well as a lack of resources to combat environmental crime, there remains a lack of awareness among the public of how to report such crimes, not helped by the somewhat fragmented reporting mechanisms in NI. Consideration should therefore be given to a revamp and promotion of the current NIEA Environmental Crime reporting facility.

The Department should also provide greater detail as to how it will collaborate with Department for Infrastructure to achieve those targets that relate to walking/cycling/public transport, and what those targets will entail.