

# Response ID ANON-GV5N-EWPG-K

Submitted to Environment Strategy Consultation  
Submitted on 2022-01-18 20:21:08

## Introduction

What is your name?

Name:  
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What is your email address?

Email:  
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What age are you? (Optional)

Not Answered

What is your organisation / school?

Organisation:  
Rural Community Network

1a Do you agree with Strategic Environmental Outcome (SEO) 1: 'Excellent air, water, land & neighbourhood quality'?

No

Comments (Please limit your response to 120 words):

This SEO is aspirational and depends on the definition of excellence used. The tables set out under SEO 1 contain surprisingly few commitments that are measurable, specific with timelines for implementation.

1b Are you content with SEO 1 tables (1 to 6)?

No

Comments (Please limit your response to 120 words):

In terms of air quality NI needs many more monitoring stations than the 3 that currently measure PM2.5. Ammonia concentrations and nitrogen deposition levels need to be measured across NI and not just at designated sites so we can have a more complete picture of pollution caused by these chemicals. Air quality actions and targets need more detail although we accept that Clean Air Strategy and Ammonia Strategy will contain specifics clear statements should still have been included in this strategy. We agree that fewer pollutants should be released by home heating systems but regret that the strategy doesn't specify targets or actions to achieve this. The strategy does not include the latest statistics published by DAERA which shows that none of 450 water bodies across NI achieve good environmental standard. A fundamental change in approach is needed to address pollution from agri food industry and from extensive discharge of sewage. It is disappointing that RBMP do not set specific targets in the programme of measures. Under the Marine and Coastal Water Resources table again there is a disappointing absence of SMART targets and actions. No target date is set for event and duration monitoring programme to better understand sewage spills into the environment. The neighbourhood environment quality needs to include an action and targets on businesses to use less packaging as well as a target on reducing litter. The dilapidated buildings and neglected sites table needs to specify new provisions to tackle low level dilapidation and set out how it intends to significantly enhance district councils' cost recovery powers,

2a Do you agree with Strategic Environmental Outcome (SEO) 2: 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'?

No

Comments (Please limit your response to 120 words):

The current status section presents a rose tinted picture which is undermined by the ongoing decline in indicators for environmental quality, pollution and bio-diversity. RCN would argue that the Department, in partnership with stakeholders needs to develop a framework to measure landscape quality in a more objective way as it is a highly subjective concept.

2b Are you content with SEO 2 tables (7 to 12)?

No

Comments (Please limit your response to 120 words):

RCN agrees it is important that people are connected to the environment. Outdoor recreation and natural space provision offer potential to rural communities for employment and development but a balance must be struck with ensuring the sustainability and sensitive management of outdoor recreation spaces.

The off road network of both local community paths and NI wide routes need to link up as much as possible rather than develop as a patchwork of 2-3 mile paths randomly dispersed. We welcome the target to increase awareness of accessible community transport schemes but these need to be developed with further investment. We support the aspiration towards a national greenways network but would have liked to see more detail and a target date for implementation.

The target for each 4-11 year old to spend 1+ hours in nature rich settings per month by 2050 is fundamentally unambitious, We agree with the aspirations behind the targets and actions proposed in the Sustainable settlements table but there is no detail in any of those targets and some could be considered outcomes rather than targets. In principle the idea to integrate existing and new natural features into housing development is worth exploring but there is no consideration in the strategy on what this might mean for population density in settlements and how that may impact on development and development sites. The historic environment table doesn't appear to contain any measurable actions or targets on p43. Any future agricultural support scheme should commit to payments to farmers to protect historic environmental assets on agricultural land, The Department should consider investing in the Forest Service Guides and growing this invaluable resource of knowledge and skills that raises public awareness and knowledge of the biodiversity in the Forest Service estate.

3a Do you agree with Strategic Environmental Outcome (SEO) 3: 'Thriving, resilient & connected nature and wildlife'?

No

Comments (Please limit your response to 120 words):

See comments at 3b.

3b Are you content with SEO 3 tables (13 to 15)?

No

Comments (Please limit your response to 120 words):

RCN would have expected a more ambitious target than 30% of land and water protected for nature by 2030 but perhaps this reflects the poor environmental condition of the majority of NI habitats.

Several of the "actions" described on p46 are not actions but describe process issues and how the Department will work.

We welcome the target to create or restore 75,000ha of wildlife rich habitat outside the protected site network but this needs to include a target date to measure implementation.

Table 14 Protecting Nature at Sea contains few SMART targets.

We agree with the proposal to reduce unnecessary light emissions to reduce energy usage and reduce negative impact on nature. This may require a different approach in rural communities where less street lighting is installed and sources of light pollution are more likely to emanate from private homes and businesses.

4a Do you agree with Strategic Environmental Outcome (SEO) 4: 'Sustainable production & consumption on land and at sea'?

No

Comments (Please limit your response to 120 words):

The SEO identifies resource efficiency as key to the SEO but it also needs to refer to the need to fundamentally reduce consumption to enable sustainable levels of consumption and production in the future. It is welcome that the SEO applies across all sectors including industry, agriculture and energy.

4b Are you content with SEO 4 tables (16 to 24)?

No

Comments (Please limit your response to 120 words):

If the focus of increased productivity is ever increasing output from industry and agriculture then there comes a point when this is unsustainable within planetary and environmental boundaries. The future vision needs to address this point.

RCN welcomes proposals to extend the remit of producer responsibilities and targets for net cost of packaging contributed by producers, increase in recycling of drinks containers, and increase in recycling of packaging.

Reduction of SUP will require more action for suppliers and businesses to minimise their use and replace with sustainable alternatives.

DAERA may also need to take a stronger stance on inappropriate usage of Anti Microbials due to the scale of the potential threat to viable agriculture sector in NI. This could include stricter control of usage of AM and enforcement of penalties if inappropriate usage discovered.

5a Do you agree with Strategic Environmental Outcome (SEO) 5: 'Zero waste & highly developed circular economy'?

Yes

Comments (Please limit your response to 120 words):

RCN agrees, in principle that SEO 5 is an important outcome but the ESNI document acknowledges that the development of the circular economy in NI is still at a very early stage.

5b Are you content with SEO 5 tables (25 to 27)?

No

Comments (Please limit your response to 120 words):

There appear to be no actual targets for accelerated circularity in various resource streams.

RCN would encourage the Department to consider steps that can be taken that lead to a reduction in food waste overall as well as ensuring food waste is diverted from landfill. Broader societal awareness will be an important starting point but will need measurement and targets to judge progress towards reduction.

We welcome the target that by 2035 no more than 10% of NI waste will go to landfill. DAERA needs to consider further how materials are recycled and their end destination/usage.

6a Do you agree with Strategic Environmental Outcome (SEO) 6: 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability'?

Yes

Comments (Please limit your response to 120 words):

6b Are you content with the SEO 6 table (28)?

No

Comments (Please limit your response to 120 words):

Much of the detail will depend on which climate change bill makes it through the legislative process and the legislative proposals contained within it which the final draft of the Environment strategy will have to reflect.

7 Did you find the Environment Strategy content user friendly and easy to follow?

No

If "No", please suggest any improvements you deem appropriate. (Please limit your response to 120 words):

The strategy content was relatively user friendly although we did find that some "actions & targets" within the tables were misidentified and are actually outcomes that the strategy will hope to produce.

It may have been clearer to separate out the actions and targets into discreet columns.

8 Do you have any other comments or contributions?

Comments (Please limit your response to 120 words):

A general comment would be that the strategy includes much discussion on the need for development and implementation of action plans, strategies and management plans but relatively few actual targets have been set and only a few tangible actions are identified.