

Draft Environment Strategy for NI Consultation

Response to Consultation

Key points that we support

- Excellent Air, Water, Land & Neighbourhood Quality
- Healthy & Accessible Environment & Landscapes
- Thriving, Resilient & Connected Nature and Wildlife
- Sustainable Production & Consumption on Land and at Sea
- Zero Waste & Highly Developed Circular Economy

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ABOUT NIFHA

The Northern Ireland Federation of Housing Associations, formed in 1977, is the representative body for Northern Ireland's 20 registered housing associations.

Our members are all not-for-profit organisations. Together, supported by the Department for Communities and the Housing Executive, they provide just under 56,000 social and affordable homes.

Housing associations access private finance to effectively double the number of homes they could build with government housing association grant alone.

Housing associations also deliver high quality care and support to help people stay as independent as possible.

Working in partnership with other organisations, they also invest millions each year in community services and facilities.

Our sector employs more than 3,200 people and manages housing assets worth £4.5 bn.

NIFHA welcomes the opportunity to comment on this Draft Environment Strategy for NI Consultation.

PART 1: SETTING THE CONTEXT

The Environment Strategy is intended to be an overarching document setting out Northern Ireland's environmental priorities for the coming decades and will form part of the Green Growth agenda (the Green Growth Strategy will provide more detail on actions in respect of climate change & greenhouse gas emissions).

The Environment Strategy will form the basis for a coherent and effective set of interventions that can deliver real improvements in the quality of the environment and thereby improve the health and well-being of all who live and work here; elevate Northern Ireland to an environmental leader; create opportunities to develop our economy; and enable us to play our part in protecting the global environment for decades to come.

PART 2: CONSULTATION QUESTIONS

Point 1

Environmental Outcome covers key elements of our environment including air quality; water quality; land quality and local environment quality. For many people, these environmental issues represent their day-to-day experience of 'the environment' - from the air they breathe, to the quality of their drinking water and the condition of their local neighbourhood.

1A. Do You Agree with Strategic Environmental Outcome (SEO) 1: 'Excellent Air, Water, Land & Neighbourhood Quality'?

Yes

1B. Are You Content with SEO 1 Tables (1 To 6)?

Table 1: Air Quality
Table 2: Water Resources: Quality & Quantity
Table 3: Marine and Coastal Water Resources: Quality & Quantity
Table 4: Sustainable Drainage & Wastewater Management
Table 5: Neighbourhood Environment Quality
Table 6: Dilapidated Buildings & Neglected Sites

Yes. However, we require significant investment in wastewater infrastructure to enable ongoing creation of new social homes throughout Northern Ireland and there needs to be specific targets to allow this.

Point 2

Our environment is our single greatest asset. It is key to our well-being, both in an economic sense and in terms of our general physical, mental and social health - as individuals and as a society.

Engaging with people of all ages, communities, business, local and central government and the third sector will be crucial to the delivery and success of the Environment Strategy. This includes both physically engaging people with the natural and historic environment - through the provision of quality natural spaces and opportunities for outdoor recreation & learning - and engaging people and organisations with the processes and interventions that will improve our environment in the coming years and decades.

2A. Do You Agree with Strategic Environmental Outcome (SEO) 2: 'Healthy & Accessible Environment & Landscapes Everyone Can Connect With & Enjoy'?

Yes however, Green spaces are valuable for our communities and how they are accessed and connected is important. We note that there is no reference to roaming \ walking rights on private land as are available in other parts of the UK.

2B. Are You Content with SEO 2 Tables (7 To 12)?

Table 7: Connecting People to the Environment: Landscapes, Seascapes & Natural Beauty
Table 8: Connecting People to the Environment: Outdoor Recreation & Natural Space Provision
Table 9: Environment Engagement Index (EEI)
Table 10: The Next Generation
Table 11: Sustainable Settlements
Table 12: Historic Environment

Yes. However, the strategy should recognise that Housing Associations also have a role in promoting sustainable settlements. There are also significant opportunities to create sustainable

housing solutions in many of our towns and cities through pro-active targeting of vacant properties and improving the wastewater treatment infrastructure.

Point 3

We are an integral part of nature, and reliant on nature to sustain life. We can positively impact nature as we engage with it, protecting, maintaining, and enhancing a clean and healthy environment as we live, work and play. However, we can also cause harm to the environment, and this negative engagement is increasingly causing impacts to health, well-being and future sustainability.

3a. Do You Agree with Strategic Environmental Outcome (SEO) 3: 'Thriving, Resilient & Connected Nature And Wildlife'?

Yes

However, we note a number of areas that are ambiguous e.g.: 'increase in woodland' – this is fully supported but it needs to be native woodland.

Two of the targets refer to peatlands. There is no specific nature targets relating to the single greatest use of our land, i.e. agriculture.

3B. Are You Content with SEO 3 Tables (13 To 15)?

Table 13: Protecting Nature on Land
Table 14: Protecting Nature at Sea
Table 15: Natural Capital

Yes

Point 4

Sustainable production & consumption involves the production and use of products and services in a manner that is environmentally benign, socially beneficial and economically viable over their whole life cycle. Key to this is 'resource efficiency', commonly defined as using the Earth's limited resources in a sustainable manner while minimising impacts on the environment. This is something that applies across all sectors - including industry, agriculture and energy.

4a. Do You Agree with Strategic Environmental Outcome (SEO) 4: 'Sustainable Production & Consumption On Land And At Sea'?

Yes

4b. Are You Content with SEO 4 Tables (16 To 24)?

Table 16: Future Agricultural Policy
Table 17: Energy
Table 18: Productive & Sustainably Used Seas

Table 19: Producer Responsibility
Table 20: Reducing Single-Use Plastic (SUP)
Table 21: Carrier Bags
Table 22: Chemicals
Table 23: Environmental Regulation: Permitting
Table 24: Antimicrobial & Disinfectant Contamination

Yes, although there is in Table 16 no reference to controls or reductions on the use of pesticides or herbicides.

Point 5

The Circular Economy is an economic system which reduces overall demand for resources, retains the value of resources and seeks to regenerate our natural ecosystems. By designing things differently, we can reduce overall demand for raw materials, reduce waste generation and create things that retain value throughout their entire life cycle. By keeping technical and natural materials in circulation for longer at their highest value we retain their embodied carbon and can increase nature's ability to sequester carbon.

A circular economy is fuelled by renewable energy and while the decarbonisation of the energy sector is a necessary part of achieving net zero, the circular economy is an equally essential element because by its application we create more sustainable production and consumption patterns which are needed to tackle resource scarcity, inequality and waste generation.

The circulation of natural materials can create new bio-economy enterprises and will help regenerate natural systems. In a Circular Economy system we create places where people have greater access to products, businesses thrive by becoming more resource efficient and we improve the health of natural ecosystems.

5a. Do You Agree with Strategic Environmental Outcome (SEO) 5: 'Zero Waste & Highly Developed Circular Economy'?

Yes

5b. Are You Content with SEO 5 Tables (25 To 27)?

Table 25: Circular Economy
Table 26: Waste Management
Table 27: Illegal Waste Disposal & Fly-tipping

Yes

Point 6

There is broad acceptance of the desirability of shifting towards a low-carbon economy and ensuring society can respond and adapt to the impacts of climate change. Northern Ireland is the only part of the UK which does not have bespoke local climate change legislation. The Executive is committed to delivering a Climate Change Act for Northern Ireland and growing a low carbon skills base to enable Northern Ireland to play its part in limiting the rise in global temperatures to 1.5°C.

6A. Do You Agree with Strategic Environmental Outcome (SEO) 6: 'Fair Contribution To UK Net Zero Greenhouse Gas Emissions & Improved Climate Resilience And Adaptability'?

No

Comment

It is believed that Northern Ireland has an opportunity to be a leader in delivering Net-Zero in the UK context. As exemplified with Northern Ireland's adoption of wind energy as a renewable source (~49% of electricity usage), it has been demonstrated that Northern Ireland can be more than 'fair' contributors towards achieving Net-Zero.

Stating a position of a 'fair' contribution towards achieving Net-Zero indicates that the Executive do not fully recognise the vast economic opportunities of a low Carbon economy. We need to ensure that the language used indicates that tackling Climate Change is an opportunity rather than a burden.

There needs to be greater urgency in delivering a Climate Bill, quicker progress in providing the NI Energy Strategy and amendments to the Building Regulations relating to NZEB (Part F).

6b. Are You Content with The SEO 6 Table (28)?

Table 28: Climate Change

No

7. Did You Find the Environment Strategy Content User Friendly And Easy To Follow?

Yes

8. Do You Have Any Other Comments or Contributions?

None.

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