

# Environment Strategy

Public Discussion Document 2019

## Stakeholder response from Mountaineering Ireland Submitted 5<sup>th</sup> February 2020

### **ABOUT YOU Name (required)**

Helen Lawless Mountaineering Ireland

### **E-mail address (if responding electronically)**

[helen@mountaineering.ie](mailto:helen@mountaineering.ie)

### **Organisation (if applicable)**

Mountaineering Ireland

As the representative body for walkers and climbers on the island of Ireland, Mountaineering Ireland has a particular interest in ensuring the sustainable use of Ireland's upland areas, incorporating mountains, hills, bogland, forests, cliffs and coastline.

Mountaineering Ireland is recognised as the governing body for the full spectrum of mountaineering activities by both Sport Northern Ireland and Sport Ireland. Mountaineering Ireland has over 14,000 members made up of 191 clubs and 1,770 individual members (as at 31st October 2019).

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-endorsed strategies, such as the Sustainable Development, Public Health and Economic Strategies?**

Yes  No

**Comments**

Mountaineering Ireland supports the vision of the Department stated in the consultation document:

**“A living, working, active landscape valued by everyone”**

with the important addition:

**“We have well managed landscapes and high-quality urban spaces that are accessible to everyone.”**

The Environment Strategy should be brave, optimistic and far-reaching.

This Environment Strategy affects all life in Northern Ireland. It should not and cannot be seen as only belonging to one agency (NIEA) or a single department (DAERA). It must be as embedded in our government as our existence is in our environment.

Mountaineering Ireland calls for an Environment Bill for Northern Ireland to be enacted to give the Environment Strategy a binding, legal footing. Failure to do so will mean the document will lack ‘teeth’ and most likely remain largely ineffective.

Since there will always be a hierarchy of priorities in development decisions, we suggest that the Environment Strategy acknowledges this and that it contain mechanisms to ensure environmental proofing of all government policy.

Whilst it is a given that the Environment Strategy should be aligned to the current and future Programme for Government (PfG) outcomes and metrics, it should not be restricted in its ambition by being tied by existing outcome indicators.

We call for the production of an integrated landscape plan. This will provide a foundation for good decision making.

- We believe that it is not tenable to think that government policies for agriculture, energy generation and extractive industries (water, rock, gravel, minerals, gas) would sit outside or not be aligned with the environment policy.
- We point to the recent Irish Uplands Forum socio-economic report on the upland areas of Ireland North and South. It identifies an agricultural industry in crisis in upland areas and concludes only an integrated approach between agriculture, environment and economy can hope to solve this (<https://irishuplandsforum.org/>).
- It is our view that the Environment Strategy should set the context for the development of all industry and land uses and particularly for agriculture, forestry, waste, marine and for industries with large land take, emissions or other impacts on land or water.

The importance of landscape and land use should be more explicit in the vision and objectives. Upland areas, whether designated for nature conservation or not, provide a host of ecosystem services beyond conservation of species, including regulating water; the

mitigating climate change and supporting human well-being. The strategy should set out a clear intention to put our Areas of Outstanding Natural Beauty on a statutory footing and to increase the designation of our uplands as special and fragile environments.

We hope that the Environment Strategy can act as an enabler to Mountaineering Ireland strategic objective: "That mountain landscapes should be valued and protected as environmental, cultural and recreational assets".

## 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?

The Environmental Areas listed are confusing and misleading it is not clear how they are in fact separate at all. There are notable gaps e.g. Agriculture, Planning, Engagement and Enforcement as very important 'areas' so why leave them out here?

Do the Environmental Areas listed reflect a potential organisational chart for DAERA? If so, we suggest a danger of continuing the silo mentality that has restricted effective action.

That agriculture in Northern Ireland has a huge impact on Northern Ireland's environment cannot be ignored by the Environment Strategy. To do so would be ridiculous. Given that it will likely be the same department (DAERA) responsible for developing and delivering an NI Agriculture policy it is imperative that both are complementary and aligned in their outcomes. To do otherwise guarantees continued failure.

Perhaps a better alternative to the environmental areas in the discussion document would be to create overarching areas of work that the Strategy should address. For example:

- **Increasing Environmental Quality:** More Observation, more Reporting, more Education & more Enforcement
- **An integrated approach to Land (& Water) Use:** We would like to see sound policies for upland landscapes included. We see the recognition of recreation as a valid land (and water) use as being vital to integrated management of natural resources and will help strengthen the mandate for rebalancing the intrinsic value of our environment against the value that can be extracted from its consumption.
- **Planning Development:** The Environment Strategy must recognise the role planning policy and legislation has in steering & regulating how people impact on the environment, much more than just the narrow focus the 'Built Environment' title suggests. The strategy must set out how it sees Planning and the Environment interacting, e.g. the rigour (or lack thereof) of the use of Environmental Impact Assessments.

## Other Comments

### 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?

**Engagement** - To reverse apathy, to encourage positive action and to enhance direct benefits from being in the environment.

Possible measure of progress and for PfG: An Environmental Engagement Index

**Valuing Nature** – Develop this theme to provide enough information on the costs of environmental damage and degradation so people may conclude that their environment is too vital to their quality of life to harm.

Possible measure of progress and for PfG: Natural Capital Index, Environment Engagement Index, Outdoor Recreation Index

**Improving our Environment** – Further decline is disaster, a status quo is failure, we must aim for enhancement / restoration.

Possible measure of progress and for PfG: A suite of indicators including existing PfG measures and the State of Nature measures.

**A Sustainable NI** – To make it better for tomorrow progress must start today. Outcomes must be progressive and continuous. No more safe reliance on medium and long-term goal to kick the can down the road. It will not be good enough to produce outcome targets for X years, sit back and wait to excuse the failure to meet them.

Possible measure of progress and for PfG: Recycling %, Energy & water consumption per capita, waste production per capita, carbon footprint per capita.

### Other Comments

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

Environmental Engagement must be cross-cutting with the Department of Education. At school level through a statutory requirement for Environmental Education in curricula and through the Youth Service specifically through our much diminished but still existing network of Education Authority Outdoor Learning Centres.

We believe DAERA can do much more to communicate the value of a better environment as a trusted partner rather than as an enemy at the gate. Aim to re-energise, enthuse and re-equip the advisory staff so they can be effective in building relationships with people (not just farmers). Give all the departmental staff opportunities to understand the broad range of environments they work in (including the uplands).

As Mountaineering Ireland believes that engagement with a wide range of stakeholders will be of critical importance in achieving the necessary changes to the way we live and work.

DAERA should continue and encourage the (often exemplary but sometimes reluctant) practice of its officers liaising with non-governmental organisations. Especially those who can help the department in its understanding of biodiversity, landscape, sense of place, climate impacts, air and water quality impacts and human activities which contribute to viable, vibrant and active communities.

The Environmental Engagement theme could include measures such as:

1. Establishing a behaviour change knowledge resource in NI to:
  - o Summarise/ disseminate research appropriate for use by government/ eNGOs
  - o Support effective and consistent organisational communications with the public
  - o Drive public behaviour change in line with necessary changes.
2. Carry out local research to ensure relevance of findings from elsewhere to NI culture and norms.
3. Engage the public, including young people, when deciding on the priorities for which behaviours need to change.
4. Grow opportunities for young people to take action on the environment and nurture and encourage the next generation of environmentally responsible citizens.
5. Encourage in-house behaviour change campaigns within DAERA and support expansion across government departments where success is proven and expect the same approach from recipients of departmental funding.
6. Introduce an 'Environmental Engagement Index' to act as a baseline measure to determine future progress.
7. Improved collaboration between NI Statistics Research Agency, NIEA and NGOs (e.g. NIEL) to ensure that environment-focused questions in surveys (e.g. Continuous Household survey), are designed to produce the most appropriate, usable and visible data.
8. Consideration should be given to communication techniques, including the use of online platforms and particularly the usability of the DAERA website.
9. Behavioural change for 'business' is crucial; DAERA should review current mechanisms for engaging with business, including Prosperity Agreements.
10. DAERA should adhere to best practice with regards to Open Government principles, including Open Data, when engaging with the public.
11. Environmental Engagement in NI needs to fully align with requirements under the Aarhus Convention, which:
  - o Links environmental rights and human rights;
  - o Acknowledges that we owe an obligation to future generations;
  - o Establishes that sustainable development can be achieved only through the involvement of all stakeholders;
  - o Links government accountability and environmental protection;
  - o Focuses on interactions between the public and public authorities in a democratic context.

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

Change the theme title to **Valuing Our Environment**. Produce an Integrated Land Use Strategy. This will be vital to:

- Enable all who make decisions on land use, to make better ones.
- Allow our environment to meet PfG outcomes and to unlock and then properly attribute financial as well as human resources.
- End the all too often policy +/- or objective conflict where one hand protects whilst the other hand destroys.

Complete a valid and best practice Natural Capital Assessment for NI.

Work with NGOs to compile a set of Environmental Quality Indicators: expanding on those currently used as PfG measures to include some of the State of Nature metrics. Use these with effective engagement to help the public, and all stakeholders, recognise the value of a 'Better Environment'.

We 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. This will be imperative to move NI toward a circular economy, reducing consumption and waste and improving society.

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

**No**, we do not believe this theme makes sense.

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

Environmental Quality cannot be a theme, it is a measure of the success (or lack of) that past interventions have had on our environment. Observing, measuring, reporting and communicating environmental quality should be a key work package or output for the Environment Strategy.

The Environmental Quality indicators mentioned in the discussion document are almost entirely measures of problems, a bit like reporting the failure rate of an exam rather than how many passed. We suggest that to help foster pride, empathy and care for our environment measures are developed that link the quality of environment to our health & happiness. Like NIEA, ORNI Tidy NI & others we are keen to understand more of how engagement in, understanding of and empathy with our natural environment influences behaviour.

Whilst there have been a number of studies made to capture what one might call 'resource consumption data' (how people engage with / consume the outdoors - frequency, amount of time spent, activity, expenditure etc there is little published work of research attempts made

to quantify how the 'quality' of the natural environment affects the quality of experience or quality of enjoyment had by those who recreate outdoors. We support the initial work being funded by NIEA to produce an Environmental Engagement Index and an Outdoor Recreation Index.

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

1. Ministerial approval of a proactive, brave Environment Strategy and the sincere adoption of its aims across all Government Departments.
2. The creation and implantation of an independent Environment Protection Agency.
3. An integrated land use strategy for Northern Ireland that sets out Executive agreed proportions and targets for land cover, (and favourable condition) especially in relation to:
  - Peatlands including upland blanket bog
  - Heathlands
  - Wetlands
  - Recreational access and open space
  - Recreational woodland & forest
4. To deliver on public engagement with our environment there must be a recognition of Recreation as an accepted land use.
5. Formation of an NI Citizens Environment Assembly.
6. NI Environment Bill including legally binding emissions targets should be a headline measure of the Strategy and a priority for a newly-formed Assembly.
6. Create clear lines of accountability and transparency between local council plans and the objectives of the Environment Strategy.

### 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?

We generally support the outcomes but would change ...

"Everyone can access and is connected to a healthy environment" to:

**"We have well managed landscapes and high-quality urban spaces that are accessible to everyone."**

## Other Comments

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

Recognition of uplands as important natural assets and the development of policies and schemes which will encourage future management of these areas in a way that realises their potential to deliver a range of ecosystem services, including opportunities for recreation, with these public benefits in turn reflected in the scale of payments to landowners / land managers.

Mountaineering Ireland would like to see a shift in focus in Northern Ireland's renewable energy sector to improving energy storage, upgrading network infrastructure and replacing older turbines with newer more efficient ones, rather than using up more undeveloped land to create new windfarms. Mountaineering Ireland challenges the apparent presumption that remote and undeveloped landscapes are appropriate locations for industrial-scale renewable energy developments. Should these developments not be centred in industrial 6 zones or brownfield sites on the outskirts of cities and towns, with easier grid access and closer to demand centres? There should also be greater encouragement of solar PV and more investment in solar and tidal generation.

Local Authorities will be obliged to publish quarterly returns on key quality indicators and biannual returns on all the quality indicators mandated in the Strategy.

The placement of the industry development role for aquaculture, fisheries, forestry agriculture and agri-food outside DAERA. DAERA to become regulator, standard setter and monitor of progress towards a better environment.

Stronger emphasis on sustainability in industry and the adaption of the circular economy model across all industry. Specific measures for sustainability in the marine sector and marine renewable energy sector.

Some level of common ground between Environment Policy in NI and ROI.



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

Success of this strategy will depend on the breaking down of internal departmental silos, perhaps historically bound by restrictive role descriptions. Officers should be encouraged to see a collective goal of a better environment. Learn from Cuilcagh – where siloed thinking failed to challenge an inappropriate development and then delayed decision-making in relation to action to mitigate and restore damage to priority habitat.

DAERA must lead and be proactive on bringing people and organisations together. This strategy fully complemented by the agriculture strategy must enable ALL of Northern Ireland's habitats to play their full part in our healing response to the climate crisis. The ability of our uplands to manage water flow, store carbon and act as a refuge for wildlife and humans will be vital.

Our local councils are increasingly taking on the mantle as gateways and gatekeepers of some of the most fragile and special environments in Northern Ireland. The Environment Strategy must provide the instruments that encourage stakeholder engagement and that will improve accountability and transparency in the decision-making process.

The Environment Strategy must encourage openness and cultivate a shared vision for the longer-term health of the NI environment. A commitment to Open Data will be important. As will be a recognition of the law of unintended consequences and a conscious effort to avoid them.

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