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AND THE COUNTRYSIDE**
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Via email

AN ENVIRONMENT STRATEGY FOR NORTHERN IRELAND – Discussion Document

CNCC welcomes the opportunity to comment on this document, and have spent some time considering it and what might be the outcomes of an Environment Strategy for Northern Ireland. We would agree with a considerable amount of the contents of the paper, but remain uncertain of how this can be translated into a Strategy that effects real change in either direction or attitudes. We are, for example, not clear about the intended audience for this Strategy. Is it an internal departmental document, intended to drive actions and behaviour of staff, or is it for external consumption to explain the Department's approach to a wider audience? The choice of audience will dictate the type of document and its contents.

Our more detailed comments below reflect some of the other problems that we perceive that will arise. We have not answered the specific questions because we feel that these channel respondents into looking at the issue in a piecemeal manner and we would prefer to look at it in a more holistic way.

Introduction

We commend much of this section which sets out the importance of our built and natural heritage, and particularly the recognition that it is a unique asset and that sustaining our 'landscape and biological diversity also makes a small but significant contribution to protecting a much wider ecosystem which sustains life on earth'. We would have welcomed some development of the concept of ecosystem services at this point, to explain slightly more fully what this statement means in practice.

The second paragraph seems to us to get to the heart of the problem through its recognition of the complexity and breadth of the issues that need to be addressed. We would understand a strategy to have at its heart a very simple and clear message that can be understood by a wide audience, both internal and external. Those who read it should quickly gain a clear picture of where the Department stands on the subject. The problem with developing a strategy for 'the environment' is that it would have to cover so much, and would either have to be so vague as to

be meaningless, or would be very complex and very long without a clear focus. It is difficult to see how this could provide a 'coherent and effective set of interventions that can deliver real improvements in the quality of the environment' without an inordinate amount of detail. We agree that a cross-cutting approach is needed, but remain unclear how that can be delivered by a strategic document.

What the Strategy Aims to Deliver

The opening statement of this section again highlights the problem: 'the strategy will be high level but also comprehensive and outcome-focused with clear achievements that people recognise and support'. Appropriate performance indicators are essential for staff, but engaging key stakeholders implies an external audience.

The three broad themes seem totally arbitrary, and it would have been useful to explain how they were arrived at. To put the NI Economy as the main theme for an Environmental Strategy seems odd if not actually perverse; we suggest that this is rethought. We are also puzzled by the inclusion of Education under the theme of Resource Efficiency. We suggest that this is a cross-cutting theme that might be identified as such with a number of others, including climate change.

The second part of this section looks at more specific key issues of concern, looking at five areas: Levers and Sanctions, Inter-departmental Working, Hierarchies of Actions, Landscape Protection and Biodiversity Strategy. However two of these are already the subjects of White Papers produced by the Department (Better Regulation and National Parks), while a third (Biodiversity Strategy) is already being reviewed and revised.

The remaining two issues are a matter of behavioural change within the Civil Service (and beyond) and we suggest that these might form the focus of a very different strategy that would deliver real environmental benefit across the whole of government. The other specific issues would be better considered individually in more detail.

Challenges Ahead

While this section does identify some important challenges others are conspicuous by their absence. These include climate change, the end of cheap, hydro-carbon based energy, a long history of unsustainable planning policies and practices, EU directives and multi-national agreements that set important and challenging targets for us, and the future of agriculture. There is also no mention of the importance of protecting and enhancing our natural environment for the vital ecosystem services that it provides.

Key Themes

We refer to the point made above about the choice of these three themes. We are also astonished by the absence to any reference in this section to the natural environment: specifically landscape and biodiversity, which together provide the vital ecosystem services which the Introduction pointed out were so important.

Conclusions

CNCC has reluctantly concluded that this approach is seriously flawed, and that a radical rethink is required. We suggest that the current White Papers on Better Regulation and National Parks are used to look at better ways of developing strategies for different aspects of the environment, taking consultation responses really seriously, and if necessary rethinking the approaches taken. For example the National Park White Paper process could be widened to consider landscape

protection overall, in the spirit of the European Landscape Convention and taking into consideration the IUCN classification of Protected Areas.

At the same time we would suggest that some serious work is carried out on how the Department might develop hierarchies of actions in protecting and enhancing the environment. At a time of financial challenge for government this could provide an important mechanism for prioritising and delivering better value for money. This should be carried out in tandem with a cross-departmental look at a more holistic approach to joint working, and careful consideration of the role of other stakeholders, including NGOs and business interests.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patrick Casement', written in a cursive style.

Patrick Casement
Chairman