
Draft Environment Strategy for Northern Ireland;
Neighbourhood Environment Quality Unit;
DAERA;
2nd Floor, Klondyke Building;
Cromac Avenue;
Gasworks Business Park;
BELFAST
BT7 2JA

Via email: esni@daera-ni.gov.uk

14th January 2022

Dear Sir or Madam,

The Housing Executive welcomes the opportunity to provide comments on a new Environment Strategy for Northern Ireland. We believe that the new Strategy offers the opportunity to provide long-term protection and enhancement of the Northern Ireland environment.

The Housing Executive, as the Strategic Housing Authority for Northern Ireland and as a landlord with approximately 85,000 homes, has a significant influence on the social, economic and environmental fabric of Northern Ireland.

Our investment in our properties and estates and by promoting social enterprise has provided regeneration, environmental improvement training and employment opportunities and has increased community capacity. We have facilitated the delivery of new housing by managing the Social Housing Development Programme. This provided an investment of c. £209m of Housing Association Grant to deliver 2,403 new social homes in 2020/21, in addition we also invested £216m to improve our tenants' homes. This investment provides a range of positive social and economic benefits to wider society in Northern Ireland, both directly such as the provision of new homes for those in housing need; and indirectly through job creation in the construction sector and linked professions. High quality and accessible housing is also improving the health and wellbeing of tenants.

In addition, to these social and economic benefits environmental protection and enhancement is an important aspect of Housing Executive work and a core theme of Corporate and Business Plan is "Planet", which seeks to make a positive contribution to address climate change and to improve the environment of Northern Ireland.

The Housing Executive also has an Environmental Policy, which aims to ensure that our activities and decisions make a positive contribution to the sustainable development within Northern Ireland.

Our policy is to:

- maintain an independently certified environmental management system for the Housing Centre;
- remain committed to legal compliance and continual improvement of our environmental management system throughout Housing Executive business areas;
- train all staff in sustainable development awareness and provide specialist training as needed;
- develop and maintain targets in keeping with the Northern Ireland Sustainable Development Strategy;
- apply the reduce, re-use, recycle approach to waste streams;
- prevent pollution of air, land and water;
- support initiatives to develop sustainable local communities;
- offer environmental and sustainable advice to business, community and voluntary sector stakeholder organisations; and
- enhance and protect biodiversity cross all Housing Executive landholdings.

In addition, as the Home Energy Conservation Authority, we assist promoting energy efficiency in all housing stock and in new and existing development, to help alleviate fuel poverty and deliver quality, sustainable housing. We will also continue to work to reduce emissions and to build climate resilience within our own housing stock to protect and improve the quality of life of our tenants.

The Housing Executive recognises that climate change, pollution and a poor environment can have a serious detrimental effect on people's health and wellbeing. Therefore, we welcome the publication of an Environmental Strategy for Northern Ireland; we believe this provides an opportunity to address environmental harm in a holistic way. The Housing Executive believes that an Environment Strategy for Northern Ireland is important to frame actions to reduce greenhouse gas emissions, to protect our environmental assets, reduce waste, to protect biodiversity and to mitigate and provide resilience to climate change.

We have provided general comments and comments in relation to each consultation question, below.

Strategy Map

Transport is a key issue that affects our environment and is a key source of greenhouse gas emissions, therefore would like to see transport strategies or policies, such as the Department for Infrastructure's (DFI) Planning for the Future of Transport, included within the Strategy map.

We note that some of the Strategies contained in the Strategy Map, such as the Sustainable Development Strategy and the Regional Development Strategy, are long term documents and are not due to be renewed in the near future. However, we believe that some of these policy documents should be reviewed in the context of an increasingly important environmental and climate change agenda.

Sustainability

Our response to the "Environment Strategy for Northern Ireland Public Discussion Document" (September 2019) supported the inclusion of the United Nations 17 Sustainable Development Goals (SDGs). Therefore, we strongly welcome that the Draft Environmental Strategy proposes to link actions and targets to the SDGs, which can help to demonstrate how we are meeting this international agreement. The SDGs recognise that environmental protection and enhancement, and tackling climate change, must be addressed alongside addressing a range of social and economic needs including ending poverty, building economic growth and job opportunities and supporting education, health and social protection.

Global Climate and Biodiversity Action

We also support the Strategy's statement that there is a need to address biodiversity and climate simultaneously. While the Climate Change Agenda is of critical importance, this should not be divorced from, or conflict with, the protection of biodiversity and natural habitats. We believe there needs to be a coordinated approach where both these environmental agendas correspond and are achieved in tandem.

Agriculture & Environment

There are high levels of pollution emanating from the agri-food sector, with animal waste contributing to poor air and water quality. The Department of Agriculture, Environment and Rural Affairs (DAERA) 2019 Nitrates Derogation Report stated that the number of freshwater lakes failing Water Framework Directive quality standards for excessive phosphates had risen from 57% in 2014 to 81% in 2019. Therefore, while we support the proposed assistance to farmers to move towards more nature friendly farming, we also believe that this could be underpinned by enforcement. We understand that Section 51 of

the UK Environment Act enables DAERA to make regulations requiring the payment of sums in respect of waste costs.

Built & Historic Environment

We welcome the statement “Access to good quality, affordable and sustainable homes that are appropriate to people’s needs provides enhanced societal benefits including health and wellbeing”. We also agree that “use and reuse of housing, including appropriate construction, renovation and repurposing, can also play a vital role in emissions reduction while seeking to ensure a fair and just transition to carbon neutrality.”

As the Home Energy Conservation Authority for Northern Ireland, the Housing Executive delivers measures that aim to promote energy efficiency and renewable technology to reduce greenhouse gas emissions and to eliminate fuel poverty so all households can live in healthy warm environments. Minimising the use of resources and energy requirements from new and existing housing and increasing the use of renewable energy and the refurbishment and reuse of empty buildings, in addition to encouraging regeneration, will promote more environmentally responsible and sustainable housing developments.

Natural Capital

The Strategy references the post 2020 global biodiversity framework, which is being negotiated under the Convention on Biological Diversity (CBD). It sets plans to ensure that by 2050 the shared vision of living in harmony with nature is fulfilled. The initial focus is to reverse biodiversity loss and create a nature-positive world by 2030. We would like to see a firm commitment not just to conserve biodiversity but to enhance biodiversity so as to meet the global aim of a nature positive world. We note that the UK Environment Act 2021 contains legislation for England including duty to conserve and enhance biodiversity and to also make a provision for biodiversity gain a condition of planning permission. We would like to see similar duties set out for Northern Ireland in legislation and as outcomes within the draft Strategy.

Consultation Questions

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

The Housing Executive supports this objective, which directly relates to people’s health.

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

Air, water and land can be adversely affected by pollution, which is harmful to our environment and ecosystems and to human health. We would therefore like to see stringent measures to prevent pollution and a commitment to the 'polluter pays' principle. It is commonly accepted that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment. It is important that organisations, including those from the agri-food sector, that emit pollution pay the costs of pollution rather than costs being imposed on society and the wider public.

Air Quality

The Housing Executive would like to see further actions developed in relation to transport emissions. We know that traffic emissions have adverse health effects, contributing to respiratory and neurological illness, depression, stress and premature death and that there are high levels of congestion within our towns and cities, with Belfast cited by TomTom as the fifth most congested city in the UK during 2020. Therefore, the Housing Executive would like to see the Environment Strategy promote the integration of land use and transport and a 15-minute neighbourhood concept which reduces the need to travel and the promotion of walking, wheeling and cycling and the use of public transport.

We also strongly support a proposed new strategy to address Ammonia emissions, due to the significant negative affect this is having on wildlife and habitats. Ammonia emissions are linked to lung damage, heart disease, diabetes, cognitive decline, respiratory issues, higher death rates and lower birth rates and we would therefore like to see an Ammonia Strategy published, and action taken, during 2022. We would also like to see planners employ more rigorous environmental assessments when determining planning applications for ammonia emitting developments in relation to agriculture and anaerobic digesters. We also note the future outcome "Ammonia emissions reduced to a point where critical loads of nitrogen deposition and critical levels of ammonia are not being exceeded at any designated sites". We believe that "critical levels" will need to be determined by experts to ensure a level does not cause harm to the environment or human health and we believe that any established critical levels should not be exceeded across all areas, not just designated sites, as emissions can transition across large areas beyond designated site boundaries.

Water, Marine and Coastal Water Resources

We welcome actions to improve water quality in rivers and lakes, which have been subject to agricultural pollution leading to excessive nitrate and phosphate levels. We note that the UK Water Framework Directive Statistics Report 2021 states that no rivers, lakes or transitional and coastal waters achieved a Good Status under Regulation standards due to the presence of “ubiquitous, bioaccumulative toxic” (uPBT) substances and elevated nutrient levels and the presence of pesticides. However, the Strategy does not propose any action in relation to pesticides in Marine Water, therefore, we would like to see an action within the final Strategy that directly addresses this pollution.

Sustainable Drainage & Wastewater Management

We welcome a focus on drainage and wastewater management as this is essential for health and wellbeing, economic growth, a good natural environment and the development of homes, schools, hospitals, and businesses. The Housing Executive supports the upgrading of existing waste water infrastructure both in terms of improving the effectiveness of waste water treatment serving existing housing areas and to provide the capacity needed for future housing schemes in the Social Housing Development Programme. Lack of capacity has had a major impact on viability of a number of social and private housing schemes in recent years and, without the planned major investment, this is likely to become an increasingly challenging environment.

We welcome actions in relation to Sustainable urban Drainage Systems (SuDS) which can help mitigate pluvial and fluvial flood risk and help improve climate resilience. SuDS can reduce flood risk by slowing and retaining storm water and can help to free up capacity in already established drainage networks and by reducing the pressure on the capacity of water systems. Replacing paved areas with grass, trees and shrubs to slow the advance of surface water into watercourses also provides additionality by supporting attractive recreation and amenity spaces for local communities and improving biodiversity through the provision of a range of habitats. We would welcome regional planning policy

However, we believe that the Environment Strategy should recognise, within an outcome, that additional investment is needed to finance the hard engineering solutions required to provide sustainable water infrastructure that support a healthy society and environment and economic growth. We would like to see the value of sustainable water infrastructure recognised through capital investment in an integrated way across responsible organisations (Department for Infrastructure,

Department of Finance, NI Water, Department of Agriculture, Environment and Rural Affairs NI Environment Agency, the Utility Regulator and local Councils).

Neighbourhood Environment Quality

We believe that Neighbourhood Environment Quality plays a significant role in people's wellbeing, however, we believe that the draft Strategy's narrow focus on litter could be widened to support a number of different components that support environmental quality. This section on Neighbourhood Environment Quality could recognise communities who live in neighbourhoods; we therefore believe that this outcome is closely linked with supporting sustainable communities and neighbourhoods.

The Housing Executive supports a place making approach to provide sustainable neighbourhoods and communities and we believe the Environment Strategy could take into account the definition for sustainable communities outlined in the Bristol Accord. This defined a sustainable community as being:

- Inclusive and safe;
- Well connected;
- Well serviced;
- Environmentally sensitive;
- Economically successful;
- Well designed and built;
- Fair for everyone; and
- Well run.

These features of successful neighbourhoods provide a sense of place and can foster civic pride and stewardship of an area to support enduring environmental quality.

We would like to see the Environmental Strategy provide actions that will require planning and policy decisions to support the creation of well-designed, high quality neighbourhoods and developments which are compact and walkable with a mix of uses and facilities reducing demand for unsustainable travel patterns and energy, as well as supporting health and well-being.

The Housing Executive would like to see increased public awareness for households on the impacts of behaviours which could damage environmental quality in neighbourhoods. For example, while street lighting is important for the safety of communities, increased LED lights in gardens is leading to an increase in light

pollution. As well using energy, light pollution disrupts ecosystems by harming animals, whose life cycles depend on dark, and has adverse health effects on people by altering the biochemical rhythms that align with natural light levels. Other increasing activities, which can damage the environment are the use of wood burners and the increased use of tarmac and asphalt as people use their front gardens for parking cars. Wood burners contribute to air pollution, a major health problem causing respiratory illness, and increased hard surfaces, in addition to detracting from residential character and amenity, can increase the risk of flooding.

The Place Standard Tool¹ can be used by local communities to identify the features in an area which contribute to a high quality environment and elements of an area that need further attention or investment. We would like to see the Strategy recommend this tool which can provide evidence on environmental quality in neighbourhoods and which is widely used across Scotland.

Dilapidated Buildings & Neglected Sites

We welcome proposals to engage with councils through the Local Development Plan (LDP) process to prioritise dereliction in LDPs and welcome the target of new provisions to tackle dilapidation through a new and wide-ranging dilapidation bill. This also needs to be supported by an enforcement regime to deal with the negative impact of dilapidated/dangerous buildings and neglected sites.

Where it is appropriate and where empty properties could provide high quality homes, we support the refurbishment and reuse of vacant buildings and empty homes, which can provide benefits including:

- Removing blight and encouraging further investment and regeneration of neighbourhoods;
- Promoting more environmentally responsible and sustainable development through minimising the use of resources and energy requirements and creating less need to develop greenfield land; and
- Increasing the stock of affordable housing, particularly in the context of rising housing need.

We believe that the Strategy could reference the opportunities to address neglected buildings, vacancies, and empty homes under a strategic approach within the wider context of this outcome. This could support a cross-collaborative approach between

¹ [PlaceStandard](#)

partners including DAERA, DFC, DFI the Housing Executive, Housing Associations and local councils. Actions include:

- The Housing Executive can continue to progress its Heritage in Housing scheme to support the restoration of empty properties, within selected Conservation Areas, to provide affordable rental accommodation;
- Information on vacancy levels can be improved with the Housing Executive's House Condition Survey;
- LDPs can contain policies to support the reuse and refurbishment of vacant properties;
- Community planning offers a platform for collaboration between different agencies and Community Plans can contain actions support the identification and reuse of vacant properties;
- City/town-centre living initiatives and redevelopment could provide opportunities to revitalise empty homes;
- DAERA and the Housing Executive's Rural Strategy can enable rural regeneration schemes; and
- Rates support and other measures could provide an incentive to upgrade properties including incorporating energy efficient measure to support empty homes to be brought back into use.

Covid-19 has brought about an accelerated need to rethink how we use our urban spaces and places, with town centres now likely to become more multi-functional, multi-purpose locations combining retail and hospitality with business, culture, housing, community and other facilities. We welcome that the draft Strategy recognises that our town centres, which have experienced increasing vacancies leading to dilapidation, could be regenerated through town centre living. There should be a focus on increasing town/city centre living, working with key stakeholders to bring forward housing as part of a multi-functional town centre that will help support existing businesses as well as attracting new business, investment and cultural activity.

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

The Housing Executive welcomes this objective, which allows all people access to an attractive environment that supports health and wellbeing.

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

The Housing Executive notes that quality and environmentally sensitive development and environmental protection can promote attractive places where people wish to live, work and invest in, thereby supporting local economies and social wellbeing. The natural environment is valuable to the local economy and provides food, energy, flood control, clean water, clean air and aesthetics, as well as supporting wildlife and biodiversity. Therefore, the Housing Executive would like to see natural environment considerations effectively mainstreamed into policy and decision-making and to realise its potential in creating and maintaining high quality living places.

Connecting People to the Environment: Landscapes, Seascapes & Natural Beauty

The Housing Executive agrees that Northern Ireland's landscapes are valuable to people and wildlife and need protected from inappropriate development and enhanced where required. We support the proposed review of landscape policy and legislation, including regional planning policy. We believe there is an opportunity to revisit the Regional Development Strategy to provide an additional focus on the environment and landscapes. We note the aim to develop strategic ways for "the management, planning, enhancement, & protection of our landscapes & seascapes" and we believe that this should be linked with local approaches that can be taken by Councils through their LDPs.

We believe that the Strategy is light on actions to "connect people" to the environment. We believe this aspect of the outcome could be developed further in a final Strategy and action plans. For example, unique landscapes such as the Antrim Coast, the Mourne and Sperrin Mountains, Lower and Upper Lough Erne and Lough Neagh, the Lagan Valley Regional Park and the Belfast Hills can be promoted as destination open spaces. In addition, we believe that local Councils can have an important role in connecting people to landscape.

Connecting People to the Environment: Outdoor Recreation & Natural Space Provision

The Housing Executive supports greenways, blue corridors and open space as a key way to connect neighbourhoods in a sustainable way. We believe these can create attractive areas to walk and cycle, and encourage modes of transport other than the private car. Reducing travel by car can have beneficial effects, increasing health and reducing congestion, pollution and greenhouse gas emissions. It is also proven that green open space can improve physical and mental health and promote community cohesion. We therefore support actions to improve quantity, quality and accessibility of existing natural spaces, parks, recreational routes and marine & freshwaters.

We also believe that, to connect people to outdoor recreation, it is important to reduce inequality of access to natural and recreational space; therefore, we support the development of a “Changing Places Action Plan” to increase the accessibility of outdoor recreation for people with special needs or disabilities. Many public areas, including greenways, do not provide toilet facilities, benches or sufficient seating areas, which can limit their use for older people, disabled people or for those with mobility issues. These areas should be accessible to everyone. Additional seating encourages people to remain outdoors for longer instead of simply “passing through”, which may limit the potential for social interaction. Parks should also include different types of spaces with areas for sports and energetic activity and more tranquil spaces to encourage their use by a range of people. We believe these considerations should be taken into account within the “Changing Places Action Plan”.

In addition, we would like to see the Strategy support a priority to increase access to parks in areas where inequalities exist. We believe that a strategic approach could be taken to provide new spaces, including pocket parks and the creation of interconnected networks of green space in, often deprived, areas, which are located in an open space “accessibility hot spot”. This would allow everyone to enjoy the benefits that open space and nature can provide.

We would like to see open space, which includes biodiverse areas of open space, protected as well as formal play spaces and pitches which offer little biodiversity. While formal recreation space should be encouraged, this should not replace spaces with a nature conservation value.

Environment Engagement Index (EEI) and the Next Generation

The Housing Executive supports the actions and outcomes contained in these sections. This will promote public awareness and will provide data on biodiversity and climate change impacts. Connecting children and young people to the environment will support their wellbeing and mental health in the long-term and this is of increased importance during the Covid 19 pandemic.

Sustainable Settlements

We believe that the Environment Strategy should promote 15-minute neighbourhoods of mixed-use areas where there are close links between residential areas, services and employment as well as providing good walking and cycling networks that promote active travel. This can reduce isolation and promote wellbeing and support physical

activity which can improve physical and mental health and encourage inactive people to become more active, helping to reduce health inequalities.

The Housing Executive supports the actions and outcomes within this section, which will help provide sustainable communities, including support for inclusive and Green Growth, the expansion of greenway networks, promoting public realm schemes and master planning. We believe all of these actions will help meet the aim of a sustainable community. In particular, we strongly support the plan to:

- “Invest in regeneration, community assets and all parts of our housing economy, including making best use of public land for housing, maximising social value and adopting a people centred approach to investment in our towns and cities”; and
- “Secure the long-term future of the Housing Executive’s social housing stock for future generations.”

We strongly support housing led regeneration to support sustainable communities as housing provides investment and vibrancy to areas and can diversify uses in towns and cities, thereby improving their resilience.

Housing is the building block of our communities and is an essential part of our local infrastructure, as well as the foundation for health and wellbeing. We believe that it is important to deliver housing that meets our future needs and we support place-based approaches in the design and development of new places, as well as in the regeneration of our existing communities. This will help ensure that housing, which fits the needs of the local population, now and in the future, is a key element of building resilient and sustainable communities that can sustain local services. The delivery of mixed tenure communities also enables a range of people from different backgrounds to live together, to create more cohesive, inclusive, and balanced communities.

The Housing Executive believes that major investment and funding are crucial to secure the long-term future of the Housing Executive’s social housing stock for future generations. High standard Housing Executive stock is vital to addressing housing need, good housing management, sustaining vibrant, sustainable, and resilient communities, and supporting community strategies such as tenant engagement. Therefore, we would like to see sustained and increased finance made available and a long-term solution to funding the significant investment needs of our stock. Therefore, we are working in partnership with DFC to deliver on the minister’s statement in November 2020 to revitalise the Housing Executive, which would enable the organisation to borrow, in order to invest in its existing stock and to build new social housing. A broader investment programme could allow a new build re-provision and would complement our role in the administration and delivery of the Social Housing

Development Programme. This would help maximise the level of stock available for letting to meet rising housing need.

The Housing Executive's statutory Housing Sale Scheme continues to reduce the supply of social housing required to meet current and future need with many sold properties entering the private rented sector. This also means that the owners of sold properties do not benefit from the added value and investment that the Housing Executive can provide in its housing stock. We also believe that the continued operation of the statutory Housing Sale Scheme can contribute the residualisation of Housing Executive estates and will continue to undermine the promotion to deliver sustainable communities. The Housing Executive would, therefore, like to see the legislation, ending statutory House Sales Schemes for Housing Associations in Northern Ireland by August 2022, extended to the Housing Executive. This would ensure social housing stock is secured for future generations to help meet rising waiting lists and those in housing stress.

This also links with Strategic Environmental Outcome 1 "Excellent air, water, land, & neighbourhood quality" as investment in our housing stock will prevent dilapidation and neglect.

Historic Environment

The Housing Executive supports the protection, conservation and enhancement of heritage assets. The historic environment is important to provide distinctive places and civic pride. We therefore welcome the development of a Culture, Arts and Heritage Strategy. In addition, the Housing Executive's Heritage in Housing programme has supported the regeneration of vacant buildings in Conservation areas for housing and we would welcome an expansion of this programme.

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

We support the objective "thriving, resilient, and connected and wildlife" but would like to see a more specific reference to biodiversity gain, to reverse the loss of and to increase numbers of flora and fauna species and habitats.

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

As biodiversity and habitats has been in significant decline in recent years, we believe this warrants specific attention. The State of Nature report in 2019 records that there has been widespread loss and degradation of habitats across Northern Ireland, from which wildlife has not recovered. It also states that 272 species (11%) are currently

threatened with extinction across the island of Ireland. It is not possible to accurately quantify this at a Northern Ireland level as there are no specific assessments for Northern Ireland available. Therefore, the Housing Executive welcomes proposals under Natural Capital to enhance and maintain DAERA datasets to determine ecosystem conditions of broad habitats and ecosystem services, and that these datasets align with monitoring in the rest of the UK.

Due to the dramatic loss of biodiversity we would like the proposed outcome “Biodiversity loss in NI is halted, gains in biodiversity are real and measurable, habitats and species have achieved favourable status” to be strengthened. This outcome suggests that, while the status of habitats and species could be protected, it does not contain an explicit aim to enhance biodiversity. We would like to see an aim to increase levels biodiversity and that, as in England, planning permission can set a condition which requires biodiversity gain. We would also like to see planning policies and management practices that protect and enhance areas of ecological importance, including priority habitats. Planners can support additional biodiversity by requiring the provision of habitats and feeding stations for animals and birds. We believe that the Environment Strategy should encourage planners, developers, landowners and households to take actions to support wildlife, as occurring elsewhere in Europe and Great Britain, by providing for example:

- Bird boxes;
- Bird feeders;
- Insect hotels;
- Fruit trees;
- Wild flower meadows;
- Tree planting
- Wildlife tunnels; and
- Swift nest bricks in new development.

We support the draft Strategy’s recognition that trees and woodland contribute significantly to people’s wellbeing and the natural environment, providing habitats and sustaining biodiversity. Ireland is the least wooded region in Europe, with 7% wood cover compared to a European average of 44%. Of the trees in Northern Ireland, 80% are recent conifer plantations, as opposed to native species which can better support wildlife. In addition, the provision of trees and green open space can aid flood protection and water management, help mitigate the effects of climate change, promote regeneration and investment and increase a sense of place and well-being.

The Housing Executive believes it is important to protect and create woodland in the countryside and to increase the number of trees within cities and towns. A recent report by UCD stated that tree-lined streets increase the value of homes and the wellbeing of people and raise the IQ of children. We would like to see policies to encourage tree-lined streets within new developments; this urban greening can result in both health and environmental benefits.

We welcome the aim to develop and publish a new Biodiversity Strategy 2030 by 2022. We note that the previous Biodiversity Strategy to 2020 contained 57 actions, of which 25 were not fully achieved. We would like to see the new Biodiversity Strategy provide ambitious targets and actions that are rigorously implemented and achieved to ensure a recovery and biodiversity and habitat gains.

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

The Housing Executive supports the outcome for sustainable production and consumption on land and at sea.

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

The Housing Executive generally supports actions in relation to Productive & Sustainably Used Seas, Producer Responsibility, Reducing Single-Use Plastic and Carrier Bags. We believe actions under these themes will also help to meet Outcome 5 "Zero waste & highly developed circular economy".

Future Agricultural Policy

We note the target for a future Agricultural Framework and the proposed vision. We believe that this Vision should include stronger objectives for more environmentally sensitive practices with aims to reduce agricultural pollution, which is harmful to health and land and water ecosystems.

Consumers are increasingly looking for high quality, climate and environmentally friendly practices and humane animal husbandry when selecting products. An increase in productivity, as seen in the growth of industrial pig and chicken farming, has led to significant environmental damage within Northern Ireland including increased air and water pollution, which is damaging to ecosystems and wildlife and human health. We are therefore concerned with an Agricultural Framework that references an increase in productivity and profits, with no strong reference to more environmentally responsible practices. We would not like to see the outcome to have

sustainable production and consumption not being met, due to a sole focus on productivity, without establishing and enforcing environmental targets.

Energy

We welcome the launch in December 2021 of the Path to Net Zero Energy, Energy Strategy for Northern Ireland, with a long-term vision of net zero carbon and affordable energy for Northern Ireland. We support that the Environment Strategy has incorporated the five principles of the Energy Strategy. These are:

- Placing you at the heart of our energy future;
- Grow the green economy;
- Do more with less;
- Replace fossil fuels with renewable energy; and
- Create a flexible, resilient, and integrated energy system.

As the Home Energy Conservation Authority for Northern Ireland, the Housing Executive believes that new homes and buildings should be designed to be energy efficient, low carbon, water efficient and climate resilient. A future-proofed home, looking holistically to meet the changed climate and demographic and social needs, will improve health and wellbeing, address housing inequality and fuel poverty, in addition to helping to mitigate the environmental impacts of housing.

Housing accounts for 13% of greenhouse gas emissions in Northern Ireland, which is above the UK average, and we would like to see actions developed and funding provided to improve the energy efficiency and sustainability of new and existing homes that help improve the quality of life and health and wellbeing of all residents.

The Housing Executive supports a “fabric-first” approach to energy efficiency which can help alleviate fuel poverty and deliver quality, sustainable housing that is more suitable for renewable energy supply. In addition, we would like to see the integration of renewable energy technologies, both in the design of new buildings and through the appropriate retrofitting of such technologies to existing buildings or for neighbourhoods, through community heating projects. However, we believe that, following experience in England, there is a need for regulations to be put in place for community heating projects and we would like to see this as an action within the Strategy.

We would like to see new LDPs requiring developers to demonstrate that measures to reduce energy consumption and incorporate sustainable design solutions have been considered and incorporated into their proposals.

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

The Housing Executive welcomes an outcome that will help ensure an efficient use of resources and a reduction in waste.

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

The Housing Executive looks forward to the publication of a Circular Economy Strategic Framework (CESF), which is being progressed in partnership with all Government Departments.

The Housing Executive supports waste management and a reduction in illegal waste disposal which can cause environmental damage and be harmful to people's health. We support the Strategy's overarching approach where waste prevention is preferred over recycling. We believe an important element of reducing waste will be actions to raise awareness on waste avoidance, collection, reuse and recycling.

Minimising the use of resources and energy requirements and increasing the use of renewable energy and the refurbishment and reuse of empty buildings will, in addition to encouraging regeneration, require less resources and produce less waste, thereby promoting more environmentally responsible and sustainable developments.

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

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

We strongly believe that Northern Ireland must fairly contribute to the target of UK-wide net zero by 2050, however, we believe this would be easier to achieve with legislation. We are disappointed that the Environment Strategy is being developed without the benefit of Climate Change legislation. We believe that it is crucial that a Climate Change Act is in place to drive forward strategies, including the draft Environment Strategy, and associated action plans.

We welcome the inclusion that established indicators used across jurisdictions, such as "carbon budgets", should be adopted to measure progress and performance against other regions. This will help to ensure Northern Ireland plays a fair role in assisting the UK meet 2050 carbon reduction targets.

As the Home Energy Conservation Authority, the Housing Executive supports actions to improve energy efficiency. Housing is a key target for energy efficiency improvements, with residential development accounting for 14% of Greenhouse gas emissions. To achieve decarbonisation, there is a strong need to retrofit existing building stock and for new build to meet higher energy-efficiency standards.

We believe that Building Standards need to require the highest levels of climate resilience including net zero carbon development. We would like to a step change in the provision of Passive house standards and we believe that an open and transparent policy discussion is required on the optimum approach require new homes to be net zero carbon as rapidly as possible, and as close to the end of this decade as possible. Much more robust standards on new homes would ensure a step change in the energy efficiency in new homes, which reduces the building's ecological footprint. Passive house standards in particular result in ultra-low energy buildings that require little energy for space heating or cooling. Well-designed homes and buildings that are efficient help to reduce greenhouse gas emissions, by incorporating features that encourage sustainable lifestyles and by maximising natural ventilation and achieving thermal comfort

Minimising the use of resources and energy requirements from new and existing housing, and the use of renewable energy will reduce greenhouse gas emissions, improve climate resilience and will promote more environmentally responsible and sustainable housing developments.

Greenhouse gas emissions are widely recognised as a form of pollution because they cause potential harm and damage through impacts on the climate. When the pollution cost from the release of greenhouse gases is not imposed on emitters, these costs are 'externalised' and paid by society. We believe there is an opportunity for industries, responsible for emitting greenhouse gases on a large scale, to pay a carbon/greenhouse gas emission price, corresponding to the costs that would be borne by the public. The "internalisation" of these costs provides a financial incentive to minimise pollution costs by reducing emissions. This is important when promoting a "just transition" where the burden, created by a move to reduce emission, does not fall on the most vulnerable in society instead of the polluter.

Addressing the effects of climate change requires shared action at a global scale, however, detrimental impacts will be felt at local levels. Communities will experience changes to their environment, including increased flooding in places. Place-based and local work can help reduce greenhouse gas emissions and support the transition to a

net-zero economy in a socially just way. We therefore support local Councils bringing forward environment and climate change plans such as Belfast City Council's Resilience Strategy; Derry City and Strabane District Council's Climate Change Adaptation Plan and Fermanagh and Omagh District Council's A Climate Change and Sustainable Development Action Plan.

It is important to recognise that climate change mitigation and adaptation measures can deliver important co-benefits to issues such as health, reducing inequality, improving the physical appearance of a place and supporting inclusive growth. Incorporating accessible, natural and semi-natural spaces, such as parks, trees and waterways, are linked with improving both physical and mental health, providing opportunities for physical activity and play and socialising, as well as active travel. Green spaces that are well designed and maintained attract more visitors and neighbourhoods with attractive green areas or vegetation are viewed as safer which makes them more 'walkable'. Open space and trees are part of the infrastructure to reduce flooding risks and provide spaces for local food growing and help to improve air quality.

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

The Environment Strategy is generally easy to read but it could benefit from the addition of a glossary and some further information on some of the technical terms and statistics.

8. Do you have any other comments or contributions?

Strong leadership will be required to achieve zero net climate changing emissions by 2050. This may require new ways of living and people will need proven and best practice examples to encourage new behaviours.

The Housing Executive would like to see engagement, environmental education and training made available for political representatives, government officers and the private sector so that the environmental effects of current and proposed policies, strategies and activities are adequately considered.

We note the draft Strategy reports in Section 6 on Departmental Activities that are taking place to protect the environment. We believe that, in the future once the Environment Strategy is endorsed at Executive level, all Government Departments, public bodies and the private sector must have regard to the Strategy when exercising their functions. However, there is limited discussion on DFIs planning roles or the role of local government. Council's LDPs are mentioned only with reference to the historic environment.

Planning has a legislative duty to further sustainable development and to improve wellbeing, and we believe the Strategy should highlight the central role that planning authorities and LDPs can have to help deliver the Strategic Environmental Outcomes. LDPs can embed environmental consideration across all policy areas and can contain climate change policy to limit greenhouse gas and carbon emissions and to improve climate resilience. LDPs can include policy that requires developers to demonstrate how they are delivering:

- low carbon buildings;
- SuDS in new development;
- flood prevention and protection;
- waste management;
- renewable energy;
- the integration of land use development with transport to reduce the need to travel;
- active travel (walking, cycling and wheeling);
- the protection and enhancing the natural environment;
- biodiversity gain;
- open space and blue and green corridors;
- the protection of the built environment and supporting regeneration; and
- the facilitation the delivery of high quality housing in attractive mixed tenure environments.

The implementation of LDP policy has the potential to provide significant positive effects on local environments across Northern Ireland.

The private sector will also need to embed environmental action if the outcomes of the Strategy are to be achieved. We would therefore like to see continued engagement with all sectors of the economy as part of the Environment, Energy, and Green Growth Strategies.

We also believe there could be a series of actions developed around public awareness, providing information on how to reduce consumption of energy, water and other resources and to help to reduce waste and pollution.

We would also support greater consideration of the need to integrate transport and land use planning to reduce the need to travel and to support more sustainable travel choices. Locating housing nearby to services and with good access to public transport, walking and cycling facilities will result in a reduction in car use and can lead to communities that are more cohesive, as well as contributing to the reduction of

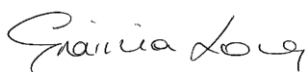
greenhouse gases and promoting active lifestyles. Research shows that, as people travel without cars, they interact with neighbours and use local shops and facilities. Developments should be promoted which reduce car dominance in local streets, encourage pedestrian and cycle journeys and make it safer for children to walk to school and play outside. Designing developments where pedestrians and cyclists are given priority will help support better health outcomes and a quality environment in a neighbourhood.

The Housing Executive recognises there are synergies between this draft Environmental Strategy and some existing and emerging strategies such as the Energy Strategy, the Green Growth Strategy and the Housing Supply Strategy. Some of the actions and outcomes identified within one strategy could be similar to those contained in another which we believe is a strength, rather than duplication, reinforcing the commitment to address complex issues in a more holistic way, as each Strategy can provide different perspectives and identify linkages with other areas. This can encourage greater collaboration between all stakeholders and can allow the pooling of investment and resources by Departments to ensure common and cohesive approaches.

We would welcome further discussion in relation to our comments and to any of the issues raised above.

We trust this information is of assistance.

Yours faithfully,

A handwritten signature in cursive script, reading 'Grainia Long'.

Grainia Long
Chief Executive