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15th February 2021

Dear Sir or Madam

CLEAN AIR STRATEGY FOR NORTHERN IRELAND - A PUBLIC DISCUSSION DOCUMENT

Thank you for the opportunity to respond to the above consultation document. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland with over 11,500 farm family members.

The Ulster Farmers' Union has not provided comment on the entire document but those elements more relevant to farmers and rural dwellers.

Chapter 1 – Section 1.15 Carbon Emissions

The UFU agrees that strategies on both air quality and carbon reduction should be co-ordinated to avoid perverse outcomes.

The UFU are the largest representative body for the land-based sector in small-scale renewables in Northern Ireland. We have a significant number of our members who have wind turbines, AD plants, hydro-electric units, and solar PV installations on farm premises. Collectively, by way of the Strategic Energy Framework (SEF), Northern Ireland is now producing 48% of our energy from renewable sources.

SEF expired in 2020 and DfE are yet to reach the consultation stage on the new Energy Policy, which is not likely to be completed and implemented by 2022. Decarbonisation targets are now in the policy spotlight, Department for Economy (DfE) have identified a target of 80% of renewable energy by 2030. In line with this they have identified that improved progress needs to be made in relation to heat and transport and the DfE Call for Evidence reflected this.

The UFU are at the forefront of advancing new renewable technology such as the development of hydrogen from wind energy and biomethane and biogas advancement from AD plants which could replace fossil fuels and therefore could assist in addressing air quality issues. In relation to the latter, the UFU are involved in a collaborative network highlighting and promoting the fact that we have the technical capability to deliver real and 'step change' reductions in carbon emissions. This network is

developing a clear vision, delivering ‘closed loop solutions’ in the management of controlled wastes, i.e., embedded energy can recover and cleanse by-products from slurry. This combination of technologies (including micro-scale AD) has been proven to lead to significant reduction in carbon emissions and the Network are promoting that part of a solution to meet future targets.

The UFU have identified that the single largest challenge for the further development of renewables going forward is the lack of policy alignment across government. Renewables can play a significant role in the post-Covid economic recovery and green growth and this will only be achieved through policy alignment which has been lacking to date. The barriers that plagued the sector for the last decade have not been resolved and as an example, planning policy and grid infrastructure will inhibit the land-based sector in playing its role in reducing emissions from fossil fuels.

6. Should biomass heating be discouraged in urban areas or in areas with poor air quality?

As outlined above, it is important that a cross-Departmental approach is taken to this. A future consultation on NI’s Energy Strategy should consider the impact of biomass heating on air quality and a balanced approach developed taking into account the economic, social, and environmental factors.

Chapter 2 - Transport Emissions

9. Are there any potential measures not included here that you believe could help encourage a shift away from private car use to walking, cycling, and public transport?

Public transport is lacking in rural areas. To encourage use of public transport in rural areas the range of services available and timetables must improve. In addition, bus stops in the countryside often do not have a bus shelter or are poorly lit. This is dangerous, especially in winter months when there is less daylight, and this could deter people from using bus services.

There are also questions around the efficiency of public transport in rural areas with large vehicles that must stay on main roads due to their size, with set pickup and drop of points and sometimes with only one or two passengers on board. Those rural dwellers who do not have access to a car or live on minor rural roads are at a serious disadvantage due to their location. This is where community transport operators across Northern Ireland with small mini-buses or a volunteer car service can provide a cost-effective door to door service which is more efficient and also provide a link to wider public transport.

Relocating offices/ hubs/ shared workplaces to rural areas that feature on public transport routes, would not only help individuals shift from private car use to public transport, walking or cycling, but would be good for the local economy in providing jobs and encouraging spending in smaller towns. Even if employees did use a private car, they would be travelling shorter distances to work and emitting less NO_x which as seen in Figure 2-1 is at its highest during the week when people are commuting. In addition, given the COVID-19 pandemic, many businesses have adapted to having their employees work from home. Support to continue this long term, such as improved broadband in rural areas, would reduce emissions from private cars for business/ work purposes.

There should also be a focus on improving school transport as this would reduce the number of individual private journeys to schools and have a positive impact on emissions. The exclusion of children who live less than 2 miles (primary) and 3 miles (secondary) from schools but in rural areas should be re-considered. Many of these children reside on bus routes but are unable to access due to

the current DoE policy yet walking is not feasible due to safety issues particularly on rural roads with no pavements and lighting. Cross-departmental working is required to address this issue.

Services such as medical centres, libraries and schools are being centralised. Removing these services in addition to poor public transport networks leaves no other option than for people to use private cars to travel to appointments or to essential services over longer distances. Keeping services in rural areas is not only good for the community, but also the environment as private car journeys would be much shorter.

10. What would encourage you to consider buying an electric vehicle as your next car?

Electric vehicles and replacement batteries would need to be more competitively priced compared to a diesel or unleaded vehicles. Grant aid or incentives could assist in lowering the cost for consumers. The miles per charge would have to be the same if not superior to the number of miles a car can travel using a tank of diesel or petrol – this is particularly important for those living in rural areas who have longer commutes and journeys.

In rural areas where 4x4 vehicles are more common for practical reasons such as wintery weather, pulling trailers or driving on rough terrain. Is there a suitable electric vehicle available for these purposes?

Access to charging stations could be problem particularly at busy places e.g., workplace car parks. There would need to be sufficient charging ports for the number of cars in the carpark. The length of time to charge can be long and inconvenient.

11. Do you think that DAERA should develop a Low Emissions Zone Framework for dealing specifically with transport emissions in Northern Ireland? OR Would you be in favour of Low Emissions Zones for urban areas also covering other sources of pollution, for example those from household heating?

DAERA should develop a separate Low Emissions Zone Framework for dealing specifically with transport emissions in Northern Ireland for urban and rural areas separately. Rural areas are more isolated and further away from services so rely more heavily on private cars.

12. What are your views on vehicle charging cordons for entry to the most polluted parts of urban areas in Northern Ireland?

The UFU would query what level of air pollution would merit a charging cordon as this is not identified in the document. The introduction of a charging cordon in some urban areas would negatively impact the high street which, are already at risk due to a shift to e-commerce and the impact of COVID- 19. The cost of living and working in our major cities and towns would increase and it would be the individual who would have to bear the cost of it. It also does not encourage new companies to set up offices in urban areas of NI and could result in emissions being relocated to more rural areas. There may also be a greater impact on those who live and commute from rural areas who due to poor public transport links have no option but to use private cars to enter urban areas. The cost of parking in urban areas, park and ride facilities, public transport and promoting the switch to electric cars should be encouraged in the first instance with a charging cordon only considered as a last option.

Chapter 3 - Household Emissions

Should urban areas, in their entirety, be designated as Smoke Control Areas

As Smoke Control Areas are not found in rural parts of NI, UFU cannot comment on the designation of areas. The views of those within Smoke Control Areas should be sought and listened to.

Should the law be changed so that non-smokeless fuels may not under any circumstances be sold in Smoke Control Areas?

As Smoke Control Areas are not found in rural parts of NI, UFU cannot comment on what should or should not be sold within these zones. The views of those within Smoke Control Areas should be sought and listened to.

Should government ban the sale to the general public of smoky/bituminous/household coal in Northern Ireland?

The sale of smoky/bituminous/household coal in NI should not be banned and the UFU would strongly oppose this policy. Removing and reducing different types of fuel from the market, presents the opportunity for a monopoly to form if there are too few suppliers/types of household fuels and costs to increase. Conversion to renewable and greener fuels should be encouraged and incentivised rather than banning coal which 2% of the population rely on as their primary source of fuel. Coal is more heavily relied on in rural areas and a move to ban this would have a greater impact on rural areas.

Alternatives to coal such as natural gas, has increased through significant expansion of the network in recent years and is cheaper and cleaner than coal but is not available in most rural areas of NI.

Households that rely on coal as the primary heat source are more likely to be in fuel poverty. Therefore, alternatives such as electricity, which is more expensive than coal is not a feasible replacement fuel.

Should government ban the import, into Northern Ireland, of high-sulphur coal?

The impact on the economy and jobs must be considered when taking such permanent action, this would have a significant impact on the fuel industry and consideration needs to be given to the employment of those whose jobs would be lost. More of these jobs are likely to be located in rural areas. If high-sulphur coal was banned an affordable alternative would need to be available and support to convert to a different fuel type.

Should government ban the sale to the general public of unseasoned wood in Northern Ireland at retail outlets?

The UFU would support this, wood that is not seasoned does not burn efficiently as energy is wasted trying to remove the moisture from the wood rather than emitting heat. The moisture also creates more smoke than seasoned wood which is harmful to human health. Visual inspection of wood and randomly testing the moisture of wood sold at retail outlets would help enforce this ban.

An education piece on burning waste wood is also required to prevent individuals burning wood which has been treated with chemicals and is not intended as a fuel.

Are there any further things you think that central and local government could be doing to address air pollution from burning solid fuels?

Reducing emissions from burning solid fuels will take time and the public require an adjustment period. Government support schemes to incentivise households to switch to cleaner fuels would be

welcomed. Information on alternatives to solid fuels and the benefits need to be communicated sooner rather than later. It is difficult to make changes to a household heating system once a house is built.

Early engagement with developers and self builds is important to encourage the installation of cleaner heating systems and improved insulation to increase the energy efficiency of homes. On the other hand, aspects of rural life must be protected. Seasoned wood burned from trees that have been felled purposely in a responsible manner, from coppicing or through storm/wind damage are a renewable, economical, and traditional fuel in the countryside and a home-grown energy source for many farmers and rural dwellers, this must be permitted to continue. In addition, cutting turf has been a part of rural life for hundreds of years and many rural dwellers still have turbarry rights. Wood burning stoves and open fires can be dual purpose in emitting heat and heating water. Other renewable energies should be encouraged however, confidence in government supported renewable schemes is low as result of RHI. New technology such as filters for chimneys could also be developed to tackle emissions.

Chapter 4 – Agricultural Emissions

The Ulster Farmers' Union accepts that there is a need to deal with ammonia emissions in NI. The UFU welcome the increase in monitoring stations and the commitment to further research. Continued research is vital to ensure that agricultural ammonia emissions can be assessed accurately and managed appropriately and economically. In addition, farmers must be recognised for and given credit for actions that have already been taken on farms e.g., use of low emission spreading, genetics, grazing, diets etc.

The UFU agrees that the process in place, as outlined in the consultation document, to deal with ammonia emissions in NI is appropriate. The UFU would urge DAERA to progress the Ammonia Action Plan consultation urgently to provide clarity for farming businesses particularly in relation to planning protocols.

Other Comments

It is essential that a full Rural Needs Impact Assessment is carried out on the proposals identified within this strategy.

I trust that you will fully consider the UFU response to this consultation. If you wish to discuss this further, please do not hesitate to contact me.

Yours faithfully

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

DAVID BROWN
Deputy President