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Local Development Plan Team
Mid Ulster District Council Planning Department
50 Ballyronan Road
Magherafelt
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19 May 2020

Dear Sir/Madam,

Re: Mid Ulster Local Development Plan 2030 – Draft Plan Strategy

DAERA welcomes the opportunity to comment on the Mid Ulster Local Development Plan 2030 – Draft Plan Strategy

DAERA has considered the consultation document and our opinions are set out below. DAERA wish their representation to be heard by **Oral Hearing**.

DAERA considers the plan to be **Unsound** for the following reasons:

1. Policy SCA 1 Special Countryside Areas is unsound in respect to Soundness Test C3

Why is it unsound?

Consistency test C3 requires the Council to take account of policy and guidance issued by the Department.

DAERA supports, in principle, the designation of SCAs within the Sperrins, Lough Neagh/Lough Beg and Slieve Beagh and we welcome the presumption against all new developments in these unique landscapes. However, we are concerned that the policy in relation to exceptions (and to Lough Neagh/Lough Beg SCA in relation to minor expansion of existing developments) does not refer to the impact on the natural heritage, including international designations on Carn-Glenshane pass Special Area of Conservation (SAC), Slieve Beagh SAC, Lough Neagh and Lough Beg Special Protection Area (SPA) and Slieve Beagh – Mullafad - Lisnaskea SPA, nor the legislative obligations regarding these designations under the Birds and Habitats Directive. This is contrary to guidance in the SPPS regarding the protection of international sites.

DAERA is also concerned that in our letter dated 03/05/18 advice has not been taken up regarding the need to create a separate AoHSV policy area at Lough Neagh/Lough Beg. The NI Landscape Character assessment of the West Lough Neagh Shores states that *“This area is important for its scenic, ecological and heritage value; for instance, the landscape setting of the Ardboe Cross and the long, expansive views along the shoreline are sensitive to mineral extraction, housing, and tourist developments”* and *“New development would be prominent in the relatively open landscapes, although there may be scope to integrate housing using extensive native planting, imitating the wet woodlands found on the edge of the floodplain”*. Without proposing adequate buffer adjacent to the proposed SCA, which is very narrow in places, the issue remains that the landscape quality of the SCA will be susceptible to adjacent developments; particularly proposals which are large and obtrusive.

In addition, at 5.10 in the in the Background Evidence paper for Lough Neagh/Lough Beg SCA, it states that *“The desktop survey, supplemented by field site visits, identified some areas which lie within the environmental designations that would not warrant protection under an SCA. Such sites include improved agricultural grassland, areas of new development and areas of amenity grassland. It is for this reason, on occasion, that the boundary of the SCA excludes some land that lies within the existing environmental designations. In addition sites which already allow for a degree of public accessibility to the lough/river shores were also excluded from the SCA to allow flexibility for appropriate development opportunities”*. DAERA are concerned about this because the last sentence does not make reference to the legislative protection given to the Lough Neagh and Lough Beg SPA designated under the Birds Directive. In addition, a building on an improved field excluded from the SCA still has the potential to negatively impact on the landscape quality of the rest of the SCA.

Changes considered necessary to make sound:

- Create an adequate buffer to the Lough Neagh/Lough Beg SCA to ensure it is not impacted by adjacent development.
- Add wording to the SCA 1 policy box referring to the obligations for international sites in Policy NH1.

2. Policy NH6 AONBs is unsound in respect to Soundness Test C3

Why is it unsound?

Consistency test C3 requires the Council to take account of policy and guidance issued by the Department.

In our letter dated 03/05/18 DAERA expressed concerns regarding the wording of the draft AONB policy, in that it was considerably reduced from PPS2 and omitted a number of the policy tests. While these omissions have now been largely addressed by section 18.31 in the justification and amplification, these policy tests are weakened because they are not within the policy box. DAERA is also concerned that 18.31 does not list the need for proposals to respect local architectural styles and patterns, traditional boundary detail by retaining features such as hedges, walls, trees and gates and local material designs and colour. This omission weakens the policy and does not provide clarity in terms of what is meant by the wording "materials and design".

Changes considered necessary to make sound:

- Expand Section 8.13 to include the need for proposals to respect local architectural styles and patterns, traditional boundary detail by retaining features such as hedges, walls, trees and gates and local material designs and colour.
- Move section 18.31 into the policy box

3. Policy TOU 4 Other Tourism Facilities/Amenities and Attractions is unsound in respect to Soundness Test C3

Why is it unsound?

Consistency test C3 requires the Council to take account of policy and guidance issued by the Department.

DAERA is concerned that Tourism Opportunity Zones have been designated over the boundaries of the Lough Neagh & Lough Beg SPA and across part of the Owenkillew River SAC, designated under the Birds and Habitats Directives respectively. While the policy states that "*Development within a TOZ will need to demonstrate that they will not have, or have mitigated against, significant adverse impacts on internationally recognised habitats*", Policy TOU 4 itself is promotive of development within the TOZ. However, where European sites are concerned, there should be no presumption for development. The wording in this policy is therefore not consistent with the Habitats and Birds Directives or the SPSS.

Changes considered necessary to make sound:

- Remove the boundary of Lough Neagh and Lough Beg SPA and the Owenkillew River SAC from the boundary of the TOZs
- Change the wording in the policy box to refer to the obligations in Policy NH1



4. Policy CT4 Dispersed Rural Communities is unsound in respect to Soundness

Test C3

Why is it unsound?

Consistency test C3 requires the Council to take account of policy and guidance issued by the Department.

The Broughderg and Davagh Upper Dispersed Rural Community overlies the Owenkillew River SAC designated under the Habitats Directive. Policy CT4 is promotive of development within Dispersed Rural Communities. However, where European designated sites are concerned, there should be no presumption for development. The wording in this policy is therefore not consistent with the Habitats Directive or the SPPS.

Changes considered necessary to make sound

- Remove the boundary of the Owenkillew River SAC from the boundary of the DRC
- Change the wording in the policy box to refer to the obligations under the Natural Heritage policies NH1

5. The following policies are unsound in respect to Soundness Test C3

Why are they unsound?

Consistency test C3 requires the Council to take account of policy and guidance issued by the Department. All the following policies relate to zoning which are, in some cases, over international and national designated sites, as well as potentially over sites with protected species and/or other natural heritage features. The wording in these policies relating to the natural heritage is inconsistent with the wording in the SPPS and therefore DAERA considers for consistency and clarity, the policies should refer to policies NH1-NH5 in the draft plan strategy.

5.1 Policy Min 2 Extraction and processing of hard rock and aggregates. It should be noted that a number of international designations are overlain by the Areas of Constraint on Mineral Development including Slieve Beagh Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site, Teal Bog SAC and Owenkillew River SAC. The policy states that when assessing mineral developments the onus will be on the developer to demonstrate that the development will not "*Prejudice the essential characteristics of a site of international / national or local nature conservation importance including ASSI's, SAC's, SPA's and local /national nature reserves or other heritage interests;*". However, this wording is not consistent with the wording in SPPS regarding the Natural Heritage.



5.2 Policy TOU1 Protection of Tourism Assets and Tourist Accommodation.

DAERA is concerned that while this policy states that “*Special care should be given to ensure that any proposal should respect and be sensitive to the character of the local landscape, wildlife and heritage interests*” it does not sufficiently protect of the Owenkillew River SAC. This site is within the boundary of the Tourism Conservation Zone and is designated for its woodland and river habitats and the species associated with these habitats; Freshwater Pearl Mussel, Salmon and Otter. The wording in this policy is not consistent with the wording in SPPS regarding the Natural Heritage.

5.3 Policy RNW 1 Renewable Energy. DAERA is concerned that an Area of Constraint on Wind Turbines and High Structures (AOCWTHS) are zoned over a number of international designated sites:

- Slieve Beagh – Mullaghfad - Lisnaskea Special Protection Area/ Ramsar site, designated for its breeding population of Hen Harriers.
- Teal Lough SAC designated for its Blanket Bog habitat.
- Owenkillew River SAC, designated for Freshwater Pearl Mussel, Otter, Salmon, Old sessile Oakwoods and Bog Woodland

The policy creates a presumption for development up to 15m high in these AOCWTHS, but does not adequately protect these designated sites located within the AOCWTHS through the list of exemptions in the policy box. The wording in this policy is not consistent with the wording in SPPS regarding the Natural Heritage.

5.4 The Mid Ulster Spatial Planning Framework. DAERA is concerned that the selection criteria for Rural Industrial Policy Areas (RIPAs) in section 4.37 only refers to designated sites and does not include undesignated areas containing other habitats, species or features of natural heritage importance such as priority habitats, priority species, ancient and long-established woodland etc. In addition, the criteria do not refer to species protected under legislation. This is in contrary to guidance in the SPPS regarding the natural heritage. In addition, the criteria relate to the **siting** of RIPAs in relation to environmental designations and does not refer to the **effect** on environmental designations and is again contrary to guidance in the SPPS regarding designated sites. Again, the wording regarding criteria in this policy is not consistent with the wording in SPPS regarding the Natural Heritage.

Changes considered necessary to make the above policies sound:

- Change the wording in the above policies to refer to the obligations under the Natural Heritage policies NH1-NH5.



6. Policy MIN 4 Peat Extraction is Unsound in respect to Soundness Tests: C3 and CE1

Why is it unsound?

Consistency test C3 requires the Council to take account of policy and guidance issued by the Department.

Consistency test CE1 requires the DPD to set out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.

DAERA welcomes in principle, with the Mid Ulster peat extraction policy that *"applications for commercial extraction of peat will not accord with the plan"*. However, we still consider the policy to be unsound because it does not explain what is meant by the exception *"where the peat land is not reasonably capable of restoration"*. This weakens the policy test by being open to interpretation and this is exacerbated by the wording in the justification and amplification at 14.27 *"Therefore commercial extraction will only be permitted from bogs where the peatland is not reasonably capable of restoration and therefore is no longer deemed active and which have little or no conservation/scientific interests"*. This statement is again open to interpretation and could be taken as being permissive of commercial extraction on inactive peat. However, just because an area of peatland is inactive, does not mean that it is not capable of restoration, nor that it has little or no conservation/scientific interest.

The current wording of this policy is also not consistent with the draft plan strategy for Fermanagh and Omagh District Council which does not permit commercial peat extraction, with no exceptions. There are many areas of peatland which occur on both sides of the boundary between the two council areas. Given the slightly different policies regarding peat extraction, there could be a situation where commercial peat extraction is not allowed on a site on one side of the council boundary and on the other side, it is allowed. Peatlands are wetlands with a very high moisture content and this characteristic is fundamental to their maintenance and peat forming capabilities. However commercial peat extraction involves the installation of drains, which damages the hydrology and could have transboundary impacts on peatlands occurring across council boundaries.

In our letter dated 03/05/18 regarding the draft peat extraction policy DAERA referred to the Interpretation Manual of European Habitats (European Commission DG Environment 1999). This defines degraded raised bogs as those which are *"capable of natural regeneration"* ie *"where the hydrology can be repaired and where, with appropriate rehabilitation management, there is a reasonable expectation of re-establishing vegetation with peat forming capability within 30 years"*. This definition

relates to raised bogs, but given that blanket bog complexes can encompass raised bogs, this definition could be reasonably extended to include blanket bog also.

Changes considered necessary to make sound:

- Add the wording “*where the hydrology can be repaired and where, with appropriate rehabilitation management, there is a reasonable expectation of re-establishing vegetation with peat forming capability within 30 years*” into the justification and amplification text to clarify what is meant by the exception “*where the peat land is not reasonably capable of restoration*”.
- Alternatively, completely remove the exception “*where the peat land is not reasonably capable of restoration*”. This would align the peat policy more completely with Fermanagh and Omagh District Council’s policy; thereby ensuring consistency between council areas with regard to peat extraction.

7. Additional comments

7.1 Landscape Character Assessment Review

The Landscape Character Assessment Review does not follow either the Landscape Institute or DAERA NIEA best practice guidelines as indicated in the recommended document ‘An Approach to Landscape Character Assessment’: Natural England: 2014. The review states “*This document has been taken into account as part of the review.*” However it does not explain how it has been taken into account. Clearly the methodology doesn’t follow that of the N.E. 2014 document. There is, for example, no reference to the ‘Landscape Wheel’: Figure 1 in the NE 2014 document. This illustrates the multi-faceted influences/factors that go to make up what we term as ‘landscape’. The cultural and heritage elements have been overlooked. The experiential qualities of landscape – landscapes that are busier, noisier, less remote, impacts on dark skies, tranquillity etc are largely missing in the assessment.

The changes highlighted are almost exclusively physical in nature but there is very little analysis of actual alterations to landscape character – it is more a notation of changes in land use (as indicated in the Conclusion paras 39.0 and 40.0 of the main report). It points out the distribution of wind turbines, single dwellings, and new roads etc but the overall impact on the landscape character within the Council area is not assessed – it concentrates on the 22 no. individual Landscape Character Areas from the NILCA 1999.

In short the LCA Review highlights changes in development since the NILCA 1999 series but there is very little on analysis and assessment of how these changes have affected and have the potential to affect the ‘landscape’ in its broadest definition and the landscape character of the area.

7.2 Policy AFR1 Agriculture and forestry development and development ancillary to commercial fishing.

The wording in Policy AFR1 suggests that only “*intensive farming and animal husbandry*” proposals need to demonstrate that they will not result in any significant adverse environmental impacts. However, other agricultural proposals can have significant adverse environmental effects eg development proposals for the storage of animal manures and slurries. The wording in the policy should therefore be broadened to encompass the range of agricultural development proposals which can result in a significant adverse impact on the environment. Suggested wording for the policy box is “*Proposals for agricultural developments must demonstrate that they will not have a significant adverse environmental impact, particularly in relation to ammonia production*”

The Justification and Amplification text for Policy AFR1 should include an explanation about the issues surrounding livestock installations and ammonia, as well as clarification on permitted development rights for agricultural buildings. Ammonia (NH₃) is a gas emitted into the air as a result of many farming activities such as the housing of livestock, the storage and spreading of animal manures and slurries and the use of chemical fertiliser. Air pollution related to ammonia, and the associated nitrogen deposition, is known to have a damaging impact on sensitive habitats, wider biodiversity and ecosystem resilience, as well as human health. Agriculture is the dominant source of ammonia emissions, currently making up 94% of Northern Ireland’s current emission levels. The majority of Northern Ireland’s designated sites are exceeding their critical levels, the concentration at which environmental damage occurs. In Section 16.11 of the justification and amplification, the wording “.....while ensuring the environment is protected” should be added to the end of the sentence.

When conferring Permitted Development (PD) rights to agricultural developments, there should be strict adherence to The Planning (General Permitted Development) Order (Northern Ireland) 2015 Permitted Development 3 and Part 7 of the Schedule ‘Agricultural Buildings and Operations’. Only when subject to the provisions of this Order and regulations 55 and 56 of the Conservation (Natural Habitats, etc) Regulations (Northern Ireland) 1995, can planning permission be granted for the classes of development described as permitted development in the Schedule.

7.3 Policy OS2 Protection of River Corridors

DAERA supports this policy regarding the protection of river corridors in principle, but it is noted that in the justification and amplification it states that this policy applies to both the Owenkillew and Ballinderry Rivers, both designated as Special Areas of Conservation. To ensure that all developments comply with the Habitats Directive



regarding these SACs, the following wording should be inserted into the Justification and Amplification text *‘Planning permission will only be granted for a development proposal that, either individually or in combination with existing and/ or proposed plans or projects, is not likely to have a significant effect on the Owenkillew River SAC and the Upper Ballinderry River SAC’*.

7.4 Maps 1.2 – 1.6

DAERA would highlight the fact that Economic Development Land Zone D ECON3 on Map 1.2 is adjacent to Black Lough which is designated as a SLNCl in the 2010 Dungannon and South Tyrone Area Plan.

It should also be noted that the Desertcreat RIPA (Map 1.6) contains long established and ancient woodland and the Tullyvannon RIPA (Map 1.5) may contain the priority habitat; open mosaic habitats on previously developed land. Open mosaic habitats on previously developed land is associated with brownfield sites and is very important for a wide range of invertebrates and plants. Economic Development Zone D ECON 6 indicated in Map 1.3 also contains open mosaic habitats on previously developed land. This priority habitat is also present on the Opportunity Site for Recreation with Supporting Economic Mixed Use Development indicated in Map 1.4.

SPPS 6.196 states that *“LDPs should seek to protect and integrate certain features of the natural heritage when zoning sites for development through ‘key site requirements’.*” Therefore mitigation and/or compensatory measures should be put in place to ensure that these important habitats for biodiversity within these areas are not lost.

7.5 Water Quality

DAERA Water Management Unit would reiterate the comments made in relation to water quality contained in the NIEA response, dated 27 January 2017 to the Preferred Options Paper. While the NIEA recommendation that a dedicated water quality section should be created in the draft strategy, separate from the topic of ‘Flooding’, has not been acted upon by Mid-Ulster Council, the Council should content itself that the water quality issues raised in the previous NIEA response are fully addressed within the draft strategy as a whole to ensure that soundness test P2 has been adequately addressed.

7.6 Marine Issues

The DAERA Marine Plan Team welcomes the opportunity to comment on the Mid Ulster Local Development Plan 2010 – Draft Plan Strategy. The following comments provide advice on how soundness could be improved in your LDP Plan Strategy, by increasing the level of regard to marine planning documents and marine legislation. In taking on this advice the integration between terrestrial and marine planning systems will be strengthened.

Whilst the Mid Ulster District is not a coastal council, it has hydrological links to the Northern Ireland marine area through its river network and is included in a River Basin Management Area that adjoins the sea. These rivers are also important for marine species, such as salmon and eels. It is important that full regard is given to the UK MPS which provides the framework for taking decisions affecting the marine area.

Draft Plan Strategy: Context

In taking account of the UK MPS the Council should also consider how to support the interaction and integration with marine planning policy (section 1.3) and the high level principles for decision making (section 2.3.2) in relation to the development of the LDP Plan Strategy and in the determination of planning applications.

It would also be helpful to set out the marine legislative requirements with respect to the determination of planning applications that affect or might affect the marine area. This will ensure consideration of marine policy documents in your decision making processes, as development proposals have the potential to impact on the marine area. For example, impacts on the water quality of watercourses and Lough Neagh could impact on important marine species which these waterbodies support. It is therefore essential that these are given consideration in your decision making.

The Council is, however, reminded that in making decisions on planning applications which affect or might affect the whole or any part of the marine area you are legislatively required (under Section 8 of the Marine Act (Northern Ireland) Act 2013 and Section 58 of the Marine and Coastal Access Act 2009) to make decisions in accordance with the appropriate marine policy documents / marine plan; unless relevant consideration indicate otherwise.

At present the UK Marine Policy Statement (MPS) is the appropriate marine policy document and is a material consideration in making decisions on planning applications. Sustainable Development is at the heart of the policy. Should decisions not be made in accordance with the UK MPS the local council in making its decision must state its reasons for not doing so.

The UK MPS promotes the integration of the marine planning system with the terrestrial planning system. It sets out the framework and high level principles (paragraph 2.3.2) for decision making and includes the environmental, economic and social issues for consideration, by decision makers (such as the local council) when permitting development. The Statement can be viewed at <https://www.daera-ni.gov.uk/articles/marine-policy-%E2%80%93-uk-marine-policy-statement>

The Department has also produced a draft Marine Plan for Northern Ireland. This can be viewed at <https://www.daera-ni.gov.uk/articles/marine-plan-northern-ireland> The Plan



builds upon the UK MPS and will come into effect when it is published in final form. In the meantime, decisions are determined in accordance with the UK MPS.

Policies

There is an opportunity to draw out linkages with the marine area within a number of policy areas.

Reference to marine policy documents (UK MPS and draft Marine Plan)

To improve integration between the planning systems and to ensure marine legislative requirements are met in the LPD Plan Strategy as set out in the UK Marine Policy Statement (MPS), you are strongly advised to include appropriate reference to the UK MPS and draft Marine Plan. You are also strongly advised to give consideration to and include appropriate reference to the common environmental, social and economic considerations and policy objectives contained within these marine policy documents, such as water quality and biodiversity. The UK MPS sets out policy objectives for common policy areas such as surface water management and waste water treatment and disposal.

Impacts and Assessment of proposals against marine policy documents

The draft Plan Strategy and its policies include references to and broad policy criteria for the water environment, water pollution and environmental pollution to water.

Given a number of rivers within the area flow into Lough Neagh which is connected to the marine area by the River Bann, it needs to be clear that these impacts could potentially also impact on the marine area (its uses, activities and environment - including ecosystem services) and are not solely restricted to impacts on land. For example, consideration of impacts on water quality should also refer to potential impacts on marine, transitional and coastal waters, as required by marine legislation, the Water Framework Directive and Marine Strategy Framework Directive. For example, Policy GP 1 and Policy OS 2 could draw out the linkages with and potential impacts on the marine area.

You are advised to have full regard to the environmental considerations (commencing at section 2.5.8) within the UK MPS that relate to MSFD and WFD, including Ecological and Chemical Water Quality and Resources' (section 2.6.4).

The policy objectives for Surface Water Management and Waste Water Treatment and Disposal (section 3.10) should also be taken into account, particularly as there are policy provisions for these in your Draft Strategy.

In addition, regard should also be given to the policy objectives for Marine Protected Areas (section 3.1) and environmental considerations in relation to marine ecology and biodiversity (2.6.1) due to the hydrological linkages, especially as protected marine species, such as salmon and eels, are present in your district's rivers and Lough Neagh.



It is important that these comments are taken on board as your LDP will help to deliver the policy objectives within the UK MPS through your decision making on planning applications, and will assist in ensuring the Council meet its legal requirements under marine legislation.

Guidance

The Planning Advisory Service has produced a 'Soundness Self-Assessment Checklist' that was updated in March 2014 to include marine planning. The checklist can be viewed at: <https://www.local.gov.uk/pas/pas-topics/local-plans/local-plan-checklist>. This document sets out the interactions between terrestrial and marine planning, including the requirements of the UK MPS for English based planning authorities. You are advised to use this checklist as a basis for ensuring soundness for your LPD Plan Strategy with respect to the Northern Ireland marine area.

In addition, the Celtic Seas partnership produced guidelines to assist planning authorities to improve integration with the marine planning system by promoting 'Good Environmental Status' of the sea. This can be viewed at: <http://www.celticseaspartnership.eu/Celtic-seas-partnership/guidelines-planning-authorities/>. The terrestrial planning system can play a key role in delivering on international obligations related to the marine environment.

7.7 Section 24 Monitoring

Given the wide range of topics under the remit of Local Development Plans, they have the potential to have a significant impact on the environment. Below is a list of suggested measures which could be used to monitor both the positive and the negative impacts of the Local Development Plan on the environment. NOTE: This is a generic list; some may not be relevant given the lack of coastline within the council boundary.

- Condition of natural heritage designated sites (both marine and terrestrial) within the LDP area (information provided from DAERA)
- Number and extent of developments approved and refused within or adjacent to designated sites (both marine and terrestrial)
- Number and extent of developments approved and refused in relation to priority habitats and species
- Number and extent of developments approved and refused in relation to protected habitats and species. (both marine and terrestrial)
- Number and extent of developments approved and refused on active peatland
- Number and extent of developments approved and refused on features of earth science importance
- Number and extent of developments approved and refused within ancient and long-established woodland
- Number and extent of developments approved and refused within AONBs, LLPAs, AoHSVs and SCAs
- Extent of blue-green infrastructure within the LDP area



- Number and extent of developments with “key site requirements” which include measures to protect and integrate species, habitats and natural heritage features (both marine and terrestrial)
- Number and extent of developments approved and refused for culverting of watercourses and sea defences
- Condition of marine (transitional and coastal) surface waters identified under the Water Framework Directive within the LDP area (information provided from DAERA)
- Number and extent of developments approved and refused in the inter-tidal area
- Number and extent of developments approved and refused in the developed and undeveloped coast (Coastal development)
- Number and extent of developments approved and refused that considered marine policy documents (UK MPS / Marine Plan)
- Number and extent of developments approved and refused that considered land and sea interactions
- Number and extent of developments approved and refused that considered impacts on the marine area
- Number and extent of developments approved and refused that also require a marine licence or other marine consents.
- The percentage of waterbodies at High, Good, Moderate, Poor or Bad status, as defined by the Water Framework Directive, in the LDP area using the publication date of the LDP as the baseline (information provided from DAERA)

Yours sincerely,

[REDACTED]
Senior Scientific Officer
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Department of Agriculture, Environment and Rural Affairs

