

Response ID ANON-TT7X-TNBF-1

Submitted to Third Northern Ireland Climate Change Adaptation Programme (NICCAP3) Public Consultation
Submitted on 2025-08-04 23:39:14

The Consultation

About You

1 Are you representing an organisation, or are these your personal views?

Organisation

Organisation name:
Belfast City Council

Part 1: Introduction - Climate Mitigation vs Climate Adaptation

2 Were you aware of the two arms of climate change action before reading this introduction?

Yes

3 How aware are you of climate mitigation actions being taken forward by government in NI?

5 - Very aware

4 How aware are you of climate adaptation actions being taken forward by government in NI?

5 - Very aware

Legislative Context

Part 2: The third Northern Ireland Climate Change Adaptation Programme - An Aligned Approach

5 Do you agree with the approach taken to align the structure of NICCAP3 to the 13 thematic areas (covered above) used by the CCC to assist in the future monitoring of adaptation progress in NI?

Yes

Additional comments to support your answer.:

There should be a recognition that these thematic areas are overlapping and interdependent, and that a place-based whole systems approach is the best way of ensuring adaptation actions achieve the outcomes and climate resilience outcomes.
For example, all thematic areas affect the ability for Belfast to be able to adapt well and be resilient in the face of climate change, not just Objective 4 which references Towns and Cities.

A Vision for a Well Adapted Northern Ireland

6 Do you feel that the vision, for a well-adapted NI, represents the ambition required to build a well-adapted NI?

Yes

Additional comments to support your answer.:

Belfast City Council welcomes the NICCAP 3 and the recognition of the role of local government in and the opportunity to work more collaboratively. We agree a whole of society approach is needed but it is unclear how the programme will achieve this.

There is potential for government to partner / support more localised action and a collaborative and joined-up approach. We would encourage a stronger recognition of local government and the voluntary and community sector with provision to support place-based approaches to adaptation.

Belfast's climate ambitions are set out in the City's strategic plan (2024-28), the Belfast Agenda. Re-naturing the city and increasing resilience to climate change is a key strategic priority with an emphasis on restoring, protecting and sustainably managing our urban ecosystems building on earlier work: a City Resilience Strategy (2020), a Net-Zero Carbon Roadmap (2020), a Climate Change Risk Assessment (2023) and a Local Area Energy Plan (2024).

This year, Belfast City Council has also developed a Climate Action Plan, aligned with the NICCAP to make Belfast an inclusive, resilient, net-zero city. This involves reducing emissions and building resilience as well as ensuring the transition is inclusive and affordable. This is embedded within our Corporate Plan.

Belfast is the only city on the Island of Ireland to achieve and maintain an A rating by the Carbon Disclosure Project. Yet there have been extremely limited resources and support provided by central government to support these efforts.

The city is home to vulnerable communities who are disproportionately at risk - the vision should reference the commitment to the principles of a just transition to create more equitable outcomes and strengthen societal resilience. Belfast has been gathering a range of evidence to understand the spatial climate vulnerabilities across the city which could be used to inform NICCAP3.

7 Do you agree with the inclusion of actions in NICCAP3 from key stakeholders outside of Departments?

Yes

Additional comments to support your answer.:

Climate adaptation requires integrated working across sectors and scales of governance, not least for local and regional government to be working together in a long term and sustained way.

We would highlight the need for more meaningful engagement with local government on NICCAP3 to facilitate more collaborative working to achieve an integrated, co-designed strategy and programme of activity. Belfast City Council welcomes further opportunities to engage with government departments and help deliver the Programme and its objectives. However, this must come with a full resourcing and delivery plan, as well as clear monitoring and reporting requirements.

We would also appreciate a more sustained approach to engagement throughout each of the adaptation cycles in Northern Ireland going forward and clarity on how integrated working will be achieved.

Key Area: Natural Capital

8 Do you wish to complete the section on Natural Capital?

Yes

Key Area: Natural Capital

9 Does the objective for Natural Capital provide the level of ambition required to meet the challenge of climate adaptation in this area?

No

Additional comments to support your answer.:

Belfast City Council welcomes the statement on Page 25 "By working with those sectors and supporting them to adapt their methods to ones which place an emphasis on sustainability, we will ensure that the natural capital which brings so many benefits to all of us is protected and enhanced in the face of a changing climate for future generations." However, this statement is not reflected in the Objective for Natural Capital nor the Actions within the CCAP. The Objective includes caveats such as "where possible" and "encourage sustainable practices". Unsustainable, damaging, polluting activities need to cease rather than an over reliance on the possible use of Nature Based Solutions to address these.

There is little acknowledgement of the current degraded and deteriorating status of our natural capital with limited reference to key pressures and cumulative impacts on ecosystems. Chapters 4 and 5 include general statements which need to be backed with scientific data and peer reviewed references.

The actions in response to the CCRA3 risks and opportunities appear to be a collection of actions rather than identifying and analysing key issues and what actions are required to address, mitigate or minimise their impacts. A strategic approach is required to address the pressures and drivers affecting our Natural Capital. In addition, there appears to be an emphasis on opportunities without due consideration of potential unintended consequences upon existing fragile degraded ecosystems.

10 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Nature?

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11 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Working Lands & Seas?

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Key Area: Natural Capital

12 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Nature?

0 - Not at all

13 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Working Lands & Sea?

0- Not at all

14 Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included in response to any of the risks or opportunities identified for this key area?

To provide details:

We would highlight that £850,514 was secured in July 2025 from the National Lottery Heritage Fund to support a new project 'Nature Towns and Cities Belfast: Breaking through Barriers to Connect People and Nature'.

In this project, Belfast City Council in partnership with Ulster Wildlife will co-design a blueprint for nature recovery across the city and its surrounding areas, including the Lagan Valley Regional Park and the Belfast Hills. As Northern Ireland is ranked among the world's most nature-depleted regions, the project will be a catalyst for existing green and blue spaces to transition designs that have a nature and climate emphasis. Opportunities will be explored to green the grey within the built environment, focusing on areas of need under the Belfast EJI (Equal Justice Initiative) and Belfast's network of alleyways and peace walls, as well as emerging active travel routes. This will be achieved by implementing the use of Nature-based Solutions (NbS).

Belfast City Council is also a key local delivery partner on the Horizon 2020 UPSURGE project, listed elsewhere in the NICCAP which could also be referenced in this section.

Key Area: Food Security

15 Do you wish to complete the section on Food Security?

Yes

Key Area: Food Security

16 Does the objective for Food Security provide the level of ambition required to meet the challenge of climate adaptation in this area?

No

Additional comments to support your answer.:

The objective should include the wider role of society in strengthening resilience of the food system. The focus on producers and industry does not align with the UK Sustainable Food Places initiative and actions to develop locally led sustainable food partnerships.

Understanding the wider societal role in adapting the food system requires a much wider range of stakeholders in NI to reduce food waste, increase local food resilience, address diet related ill-health, improve nature, reduce carbon emissions, and empower those experiencing food insecurity. A more place-based approach will provide for local solutions to improve access to climate friendly, locally sourced, nutritious food.

The definition in the NICCAP 3 should reference the UK Government Food Strategy and recognise its definition of the food system, widening its focus beyond just food production, processing and agriculture. It should also take account of the 2025 Good Food Cycle which aims to transform the system to one that is healthier, more sustainable, and more resilient. Urban food accessibility and global supply chains disruption should be referenced.

Sustainable food an ambition in the Belfast Resilience Strategy and a goal of the Belfast Agenda. BCC is developing a sustainable food strategy to enable a fairer food system that promotes human and planetary health and creates the conditions for a resilient, circular and secure food system and local food economy that everyone can benefit from.

The Council would like to see the food security section include place-based climate action in building community resilience and specify the role of local councils in supporting local community led food partnerships in action ST20 and how it might be resourced.

17 To what extent do you think the detail in the chapter goes towards providing context for the thematic area and its associated risks and opportunities in respect of Food Security?

2

18 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Food Security?

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19 Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included response to any of the risks or opportunities identified for this key area?

To provide details:

The UPSURGE project is testing agroecological approaches to urban food growing and could be referenced in this section. It is currently referenced elsewhere in the Plan.

The Belfast Food Partnership includes community-led food organisations doing exemplary work to support a sustainable local food economy.

Key Area: Infrastructure Services

20 Do you wish to complete the section on Infrastructure Services?

Yes

Key Area: Infrastructure Services

21 Does the objective for Infrastructure Services provide the level of ambition required to meet the challenge of climate adaptation in this area?

Yes

Additional comments to support your answer.:

Belfast City Council welcomes the objective to work collaboratively to increase the resilience of infrastructure. We would suggest this collaborations extends beyond public sector organisations to include a wider range of stakeholders including utility providers and operators as well as the private sector.

We would also highlight that via NI Civil Contingencies structures a dedicated Telecomms & Infrastructure Group exists, chaired by TEO. This group should be part of the wider collaboration of this programme. Without their input, assurance cannot be given on system level reliability, security and resilience across our infrastructure services and networks.

22 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Water Supply?

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23 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Energy?

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24 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Telecommunications and ICT, noting that this is a reserved policy area?

4

25 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Transport?

4

Key Area: Infrastructure Services

26 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Water Supply?

3

27 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Energy?

3

28 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Telecommunications and ICT, noting that this is a reserved policy area?

3

29 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Transport?

3

30 Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included in response to any of the risks or opportunities identified for this key area?

To provide details:

Belfast City Council would like to highlight the work of the Community Planning Partnership, in particular the Our Planet Board, it's Strategic Oversight Group and its Net Zero Delivery group which includes key partners such as the network operators, utilities and other key stakeholders including NIHE, Belfast Harbour and central government departments. These groups help to shape the City's programme of work and enable a joined up whole system approach to the design and delivery of complex resilience and decarbonisation projects.

This integrated partnership working is encapsulated in the 2024 Belfast Local Area Energy Plan. The delivery of the plan involves the increased deployment of key infrastructure such as rooftop Solar PV and feasibility work for a potential low carbon Heat Network in the city that will increase energy resilience as well as help us meet our targets for net zero as a city by 2050. For example, the thermal storage built into heat networks enable them to be used to balance the grid and hence allow for increased intermittent renewable energy deployment. Belfast City Council is also developing plans for EV charging infrastructure on its estate.

The role of place-based, whole system, integrated working across infrastructure services could therefore be emphasised more strongly in the document along with greater integration of adaptation and resilience into net zero strategies.

Key Area: People and the Built Environment

31 Do you wish to complete the are on People and the Built Environment?

Yes

Key Area: People and the Built Environment

32 Does the objective for People and the Built Environment provide the level of ambition required to meet the challenge of climate adaptation in this area?

No

Additional comments to support your answer.:

A singular focus on communities as those who need to take action is not in the spirit of a fair and just transition. We would suggest a definition of 'community resilience'. Emphasise opportunities from sectoral efforts to build climate resilience, rather than placing responsibility on communities to do it for themselves which will exacerbate inequalities. Communities should not feel responsible for their own adaptation, but empowered in preparedness and response working alongside statutory agencies aligning with ongoing work on societal resilience.

The Belfast Agenda aims to "incorporate climate adaptation actions into strategic plans and urban agendas". Recommend funding aligned to the Just Transition Committee to protect /support the vulnerable.

The LDP policies (May 2023) include a presumption against demolition of existing buildings. On climate resilience: Policies ENV2 and ENV3, on climate change mitigation and adaptation, and ENV4/5 on flood risk and SuDS. Other LDP policies covert green and blue infrastructure. On flood risk: Policy ENV4 - council adopts a precautionary approach in areas that may be subject to current/future flood risk. All planning applications reference up to date flood risk information. The Plan Strategy commits to monitor the no of permissions for non-compatible development in undeveloped flood risk areas and contrary to DfI Rivers advice.

Public realm is not referenced although vital to adaptation, maintenance, and delivery of building stock. Eg delivery of SUDs programmes increases flood resilience, unlocks economic development, promotes nature recovery, improves health/wellbeing, increases active travel, and deliver a range of climate resilience outcomes for a large proportion of NI's population. The importance of Belfast and its city centre to contribute to increased climate risk, but also to act as a multiple problem solver to climate adaptation when collaborative and integrated working is achieved should also be acknowledged.

33 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Towns & Cities?

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34 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Health?

3

35 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Buildings?

3

36 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Community Preparedness & Response?

Key Area: People and the Built Environment

37 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Towns & Cities?

2

38 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Health?

2

39 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Buildings?

2

40 To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Community Preparedness & Response?

2

41 Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included in response to any of the risks or opportunities identified for this key area?

To provide details:

Belfast City Council, alongside partners, are progressing a number of workstreams that will help realise the ambitions and agreed objectives for Belfast set out in the Belfast Agenda, our Local Development Plan, and the Belfast City Centre Regeneration and Investment Strategy. The delivery of these workstreams will support Belfast to address and prepare for future climate challenges, with mitigation and adaption required to support the city's net zero goals and provide greater climate resilience. These include:

- Housing Led Regeneration
- Growing the city centre population
- Private Sector Partnership, Belfast City Council and GRAHAM
- Placemaking Pilots
- Adaptive Reuse - including office to residential conversions
- Maximising the Public Estate

(lead is BCC and partners are Grahams and NIHE and DfC)

Key Area: Disruption to Businesses and Supply Chains

42 Do you wish to complete the section on Disruption to Businesses and Supply Chains?

Yes

Key Area: Disruption to Businesses and Supply Chains

43 Does the objective for Disruption to Businesses & Supply Chains provide the level of ambition required to meet the challenge of climate adaptation in this area?

No

Additional comments to support your answer.:

Belfast City Council recognises the risks to the local economics, business and industry sector from climate change and is taking steps to address this through a number of actions in its Climate Action Plan which is embedded in its corporate planning cycles as of 2025.

In particular, Belfast City Council will use Procurement as a key lever to support climate mitigation and adaptation, whilst driving wider supply chain decarbonisation through the integration of sustainability criteria in tendering processes.

Our sustainable procurement policy will require suppliers for relevant tenders, to commit to carbon reduction strategies and deliver environmental initiatives. Small businesses would benefit from help with their operating model so that when they tender, they are in a good position to provide a good social value/ sustainable offer which will contribute to BCC's achievement of the transition to a resilient Net Zero future. Building resilience will also then increase supplier's ability to deliver BCC contracts with minimum disruption.

However, in terms of "ambition" - the plan does not explicitly define a standalone objective or action stream focused on climate-related disruption to businesses - specifically the large number of SMEs in Northern Ireland who are not a supplier to Councils or trade internationally or are engaged with Councils or Invest NI in any way. While it addresses broader adaptation themes—such as infrastructure resilience, asset management, and nature-based

solutions—these are largely inward-facing and estate-focused.

44 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Business?

2

45 To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of Finance, noting that this is a reserved policy area?

2

Key Area: Disruption to Businesses and Supply Chains

46 To what extent do you think the actions in response to the CCRA3-IA risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Business?

2

47 To what extent do you think the actions in response to the CCRA3-IA risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of Finance, noting that this is a reserved policy area?

2

48 Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included in response to any of the risks or opportunities identified for this key area?

To provide details:

1. Limited Direct Focus on Supply Chain Disruption

The plan does not define a objective or action stream focused on climate-related disruption to businesses.

2. Procurement Actions Are Framed Narrowly

The only procurement-related action relevant to supply chains is the goal to “support businesses to understand and embed climate adaptation into their strategies and practices”.

Whilst supporting businesses to understand /embed climate adaptation into their strategies and practices is a positive step, this action lacks the depth and urgency needed to address climate-induced supply chain risks such as:

- Material shortages due to extreme weather.
- Transport disruptions from flooding.
- Volatility in global commodity markets.

3. No Mention of Business Continuity

The plan does not link climate adaptation to business continuity or emergency procurement protocols, which are essential for maintaining service delivery during climate shocks. There is no reference to:

- Diversifying supplier bases to reduce risk exposure.
- Embedding climate risk criteria into tendering and contract management.
- Business continuity planning for critical supply chains.

These are standard components of climate-adaptive procurement strategies and are notably absent.

4. Missed Opportunity for Cross-Sector Collaboration

The plan does not propose mechanisms for engaging with local businesses or suppliers to co-develop resilience strategies. This is a missed opportunity to:

- Build shared understanding of climate risks.
- Encourage innovation in low-carbon and resilient supply solutions.
- Strengthen local economic resilience –

5. No Support for SMEs

There is no action to support SMEs in adapting their business models to climate risks. This is critical, as SMEs often lack the capacity to respond to disruptions - many of the businesses impacted by the 2023 floods, for example, are unlikely to be engaged with the Council and Invest NI who deliver some training in this area.

Impact Assessments

49 Do you agree with this decision?

No

Additional comments to support your answer.:

There are a number of new actions for local government in this programme that councils have been allocated, with minimal engagement having taken place to date. Therefore, we do not agree that this programme is a coordination of only policies and proposals from elsewhere.

In addition to this, climate adaptation action has the potential when not carried out appropriately and with the adequate safeguards and checks in place to protect and plan with vulnerable populations and communities in mind, for maladaptation to occur which can be more detrimental to communities

and in particular vulnerable populations in society.

It is imperative that DAERA, through this adaptation programme, ensure that vulnerable people are protected from the unequal impacts of climate change and public investment occurs in the most effective and efficient way to avoid unintended consequences and the locking in of further costs and impacts of climate change. Therefore, we request further information on the screening out of the programme from the impact assessments before we can respond to this question.