

Public Document Pack

**Democratic Services Section
Legal and Civic Services Department
Belfast City Council
City Hall
Belfast
BT1 5GS**



**Belfast
City Council**

3rd December, 2021

MEETING OF PEOPLE AND COMMUNITIES COMMITTEE

Dear Alderman/Councillor,

The above-named Committee will be a hybrid meeting (both remote and in person) in the Council Chamber on Tuesday, 7th December, 2021 at 5.15 pm, for the transaction of the business noted below.

You are requested to attend.

Yours faithfully,

SUZANNE WYLIE

Chief Executive

AGENDA:

1. Routine Matters

- (a) Apologies
- (b) Minutes
- (c) Declarations of Interest

2. Restricted

- (a) Requests for the use of Parks for Summer Events (Pages 1 - 6)
- (b) Financial Reporting - Quarter 2 2021/22 (Pages 7 - 14)

3. Matters referred back from the Council/Motions

- (a) Notice of Motion - Street Tree Planting (Pages 15 - 18)
- (b) Item referred back from November Council - Erection of Dual Language Street Sign at Clifton Street (Pages 19 - 24)

4. **Committee/Strategic Issues**

- (a) Notices of Motion Quarterly Update (Pages 25 - 34)
- (b) Boxing Strategy Quarterly Update (Pages 35 - 40)
- (c) Representation on Association of Port Health Authorities Executive Board (Pages 41 - 44)
- (d) Update - The Queen's Green Canopy (QGC) Tree Planting Initiative (Pages 45 - 52)
- (e) External Consultations on: Northern Ireland Food Strategy Framework, WEEE Compliance Scheme Methodology, Reduction of Single-Use Plastic Beverage Cups and Food Containers DAERA Environment Strategy consultation response (Pages 53 - 140)
- (f) DAERA Environment Strategy consultation response (Pages 141 - 182)
- (g) Belfast City Airport Request - Bird Strike Management at Victoria Park: Implications to Air Safety (Pages 183 - 192)
- (h) New Biodiversity Strategy for Northern Ireland - Pre Consultation Input (Pages 193 - 204)
- (i) DoF Consultation on proposed amendments of Technical Booklet Guidance to Part F (Conservation of fuel and power) (Building Regulations) (Pages 205 - 216)
- (j) DoF Consultation on Proposed Building (Prescribed Fees) (Amendment) Regulations (Northern Ireland) 2022 (Pages 217 - 228)
- (k) Department for Communities- Notice to Quit Consultation (Pages 229 - 246)

5. **Physical Programme and Asset Management**

- (a) Naming of New Park and Sportszone at Divis Back Path (Pages 247 - 252)
- (b) Stadia Community Benefits Initiative update (Pages 253 - 260)
- (c) Partner Agreements Quarter 2 update (Pages 261 - 264)
- (d) Management of Clarendon Playing Fields (Pages 265 - 268)

6. **Operational Issues**

- (a) Update on Pest Control Service (Pages 269 - 276)

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 6
of the Local Government Act (Northern Ireland) 2014.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 6
of the Local Government Act (Northern Ireland) 2014.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank



Subject:	Notice of Motion –Street Tree Planting
Date:	7th December, 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Sara Steele, Democratic Services Officer

Restricted Reports	
Is this report restricted?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input checked="" type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	To bring to the Committee's attention a motion in relation to Street Tree Planting, which was referred to the Committee by the Standards and Business Committee, at its meeting on 23rd November.
2.0	Recommendations
2.1	The Committee is asked to consider the motion and, if the proposal is agreed, a report on how this would be facilitated, resourced and managed will be brought back to a future meeting of the Committee.

3.0	Main report
3.1	<p data-bbox="272 226 427 255"><u>Key Issues</u></p> <p data-bbox="272 324 1469 456">At its meeting on 23rd November, 2021, the Standards and Business Committee considered a report in relation to Notices of Motion, which had been received for consideration by the Council at its meeting on 1st December.</p>
3.2	<p data-bbox="272 530 1469 663">In accordance with Standing Order 37(h), the undernoted motion, proposed by Councillor McMullan, under the heading “Street Tree Planting”, was referred directly to the People and Communities Committee for consideration.</p> <p data-bbox="272 748 552 777"><u>Street Tree Planting</u></p> <p data-bbox="352 815 1313 1016">“Noting this Council’s pledge to plant one million trees by 2035 and the ongoing work to deliver that commitment on our own land, its declaration of a climate emergency in October 2019 and our commitment to work towards being carbon neutral by 2050. However, as highlighted in the Belfast Carbon Roadmap Pathway to Net Zero we can close the gap by 2033 through a range of innovative interventions, including planting trees.</p> <p data-bbox="352 1055 1313 1117">Therefore this Council commits to drastically increasing the number of street trees across the Belfast City Council area.</p> <p data-bbox="352 1155 1313 1288">Recognising that street tree planting is a function of the Department for Infrastructure, we will write to the Minister to join us in making this commitment and partner with us in drastically increasing their number across the city.</p> <p data-bbox="352 1326 1313 1458">Working with our partners we will establish a strategy and action delivery plan (including maintenance), including setting a target for increasing the number of street trees in each of the 60 wards that comprise the 10 district electoral areas of Belfast City Council.</p> <p data-bbox="352 1496 1313 1659">We will also write to the Minister for Infrastructure, as well as Ministers for Agriculture, Environment and Rural Affairs and Communities, to establish a rolling funding scheme for tree planting, maintenance and accompanying structural works (e.g. footpath widening) to enable more sites to be viable for street tree planting.</p> <p data-bbox="352 1697 1313 1861">This Council will also join the new call for pledges to the UN Economic Commission for Europe’s ‘Trees in Cities Challenge’ joining other cities around the world including Barcelona, Bonn, Victoria (Canada) and Mexico City to demonstrate our intent internationally and to learn from and share learnings with other cities.”</p> <p data-bbox="352 1899 756 1928">Proposer: Councillor McMullan</p> <p data-bbox="352 1966 703 1995">Seconder: Councillor Long</p>

3.3	<p><u>Financial and Resource Implications</u></p> <p>None.</p>
3.4	<p><u>Equality or Good Relations Implications</u></p> <p>This Notice of Motion, if agreed, may have potential equality, good relations and rural needs implications and should be subject to our normal screening process as appropriate.</p>
4.0	<p>Appendices – Documents Attached</p>
	<p>None.</p>

This page is intentionally left blank



Subject:	Proposal for dual language street signs
Date:	7 th December 2021
Reporting Officer:	Ian Harper, Building Control Manager
Contact Officer:	Roisin Adams, Business Coordinator

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	To consider the dual language street sign application for Clifton Street.
2.0	Recommendations
2.1	Members are asked to: <ul style="list-style-type: none"> 1. Consider the current updated survey results, noting the one outstanding survey, and either <ul style="list-style-type: none"> a) Make a decision to approve or refuse the application based upon the current survey results b) Defer any decision until the full survey results are available
3.0	Main report
3.1	<u>Key Issues</u> Background
3.2	The Clifton Street dual language street sign application was considered under the existing Street Naming and Numbering policy.

Policy:

In the introduction section of the policy it states:

3.3

“2.0 Introduction

The legislation requires the Council, in deciding whether and how to exercise its discretion to erect a street name in a language other than English, to take account of the views of the occupiers of premises in the street.

For the purposes of this policy occupiers shall be taken to be any person whose name appears in the current Electoral Register plus the owners or tenants in actual possession of commercial premises, but not employees in such premises.”

The procedure within the policy states:

3.4

“3.0 Procedure

The procedures for seeking and assessing the views of occupiers and the criteria to be applied in deciding whether to erect a street sign in a language other than English are as follows:

(i) Only applications supported by a petition representing not less than one third of the people appearing on the Electoral Register of the street for which the application is made will be progressed.

(ii) Where the foregoing requirements have been met the Council will canvass by post all people appearing on the Electoral Register of that street and seek their views on the request to erect a street sign in a second specified language. This letter is designed so as to make the expression of views as simple as possible. Reply will be by way of a pre-paid envelope and should be returned within one month of receipt.

(iii) Where two thirds or more of the occupiers appearing on the Electoral Register have indicated that they are in favour of the erection of a second language street sign, then such a sign will be erected. People not returning a reply will be deemed not to be in favour of the application.”

	<p>The practice is to consider all residential properties within a street, checking for those residents who are on the electoral register, and checking for commercial properties. In addition, a site visit is carried out to check all the properties on the street during the survey. Commercial properties are included in the survey, with one survey form being provided. The policy states that the method of consultation is to canvas by post. The practice is to hand deliver surveys where possible or post them using Royal Mail where this is not possible.</p>
3.5	<p>For the Clifton Street application, based on the information taken from the electoral register, and site checks of commercial properties, 12 surveys were originally issued, to both residential and commercial properties. 10 were hand delivered. 2 survey forms were posted through Royal Mail as they could not be hand delivered due to no letter box or no one present.</p>
3.6	<p>On review of the processing of this application, it was noted that two occupiers who had signed the initial petition had not been surveyed as their properties were deemed to be vacant at the time officers carried out their physical inspection of the street. However, it now appears they are in fact occupied.</p>
3.7	<p>At the committee meeting on 9th November members agreed to survey these two occupiers and asked that a report be brought back to December committee. Survey forms were hand delivered to these two properties, with an explanation on the survey to confirm the decision of committee, and that these surveys were being carried out without prejudice, pending ratification at December council meeting. One survey form has been returned and the occupier's preference is reflected in the revised totals. The other survey form has not been returned to date, however we are still within the standard response deadline. The result from this survey cannot therefore be fully reflected in the percentage totals for and against until a return is made or the deadline for return has passed</p>
3.8	<p>In addition, following the agreement at the committee meeting on 9th November a survey form was also re-issued by post to the secretary of Belfast Orange Hall, a property on the street. This property was originally surveyed by post and was declared a non-return and therefore the occupiers were deemed not be in favour of a dual language street sign in accordance with the policy. This survey has since been returned and is reflected in the revised percentage totals.</p>

3.9

Application details:

English Name	Non- English Name	Location	Applicant	Persons surveyed
Clifton Street	Sráid Clifton	Between Carrick Hill, BT1 and Carlisle Circus BT14	Carrick Hill Residents Association	14

3.10

The translation was authenticated by Queens University, the approved translator for Belfast City Council.

Results for survey carried out for Clifton Street

3.11

In accordance with the Council's policy for the erection of dual language street signs surveys of all persons appearing on the Electoral Register plus owners or tenants in actual possession of commercial premises carried out and the following responses were received.

3.12

A revised number of 14 surveys have now been issued in total, 12 hand delivered and 2 posted using Royal Mail. The revised results are:

- 9 occupiers (64.3%) were in favour of the erection of a second street nameplate
- 1 occupier (7.1%) had no preference either way
- 2 occupiers (14.3%) were not in favour of the erection of a second nameplate
- 1 occupier (7.1%) did not respond to the survey
- 1 survey is still outstanding within the standard response deadline (7.1%)

3.13

The Council's policy on the erection of a second street nameplate requires that at least two thirds (66.6%) of the occupiers on the street surveyed must be in favour of the proposal to erect a second street sign in a language other than English.

	Provision of street signs.
3.14	<p>The practice on siting the street signs is to identify those that exist on the street, and these are either added to or replaced to reflect the street name in a second language, as approved. The position of the street signs on Clifton Street are as follows:</p> <ul style="list-style-type: none"> • Junction with North Queen Street – on metal railings • Junction of Westlink on-slip (north) – wall mounted to bridge • Junction of Westlink on-slip (south) – wall mounted to bridge • A sign on railings at the junction with Carlisle Circus was damaged and is not currently in place.
3.15	There is no street sign on or beside the Belfast Orange Hall building.
3.16	<p><u>Financial & Resource Implications</u></p> <p>There is a cost of approximately £450 to cover the cost of the manufacturing and erection of the dual language street signs in the current locations. The cost for these street signs has been allowed for in the current budget.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p>
3.17	There are no direct equality/rural needs implications.
4.0	Appendices – Documents Attached
	None

This page is intentionally left blank



Subject:	Notices of Motion – Quarterly Update
Date:	7 December 2021
Reporting Officer:	Siobhan Toland, Director of City Services
Contact Officer:	Paula Carville, Executive Support Officer

1.0	Purpose of Report or Summary of main Issues
1.1	To provide the quarterly update to People and Communities Committee on Notices of Motion.
2.0	Recommendations
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> Note the updates to all Notices of Motion / Issues Raised in Advance that the Committee is responsible for as referenced in Appendix 1; and Agree to the closure of Issue Raised in Advance, as referenced in Appendix 1 and noted in paragraph 3.5 below.
3.0	Main report
	<u>Background</u>
3.1	Members will recall that the previous quarterly Notices of Motion update was presented to People and Communities Committee in September 2021.
3.2	This report provides an overview of the progress on those Notices of Motion and Issues Raised in Advance which remained open following the September 2021 update.
	Notice of Motion Updates
3.3	There are currently 24 active Notices of Motion and Issues Raised in Advance which the People and Communities Committee is responsible for. An update on those Notices of Motion and Issues Raised in Advance which remain active on the live database is attached at Appendix 1.
	Closure of Notices of Motion and Issues Raised in Advance
3.4	At SP&R Committee on 20 th November 2020, it was agreed that Notices of Motion could be closed for one of two reasons:

3.5	<ul style="list-style-type: none"> • Category 1 - Notices of Motion which contained an action that has been completed. All Notices of Motion within this category contained a specific task that has since been complete. It is worth noting that, when Committee agree to action a Notice of Motion, there are sometimes additional actions agreed alongside the Notice of Motion. As these are not technically part of the Notice of Motion, they are taken forward through normal committee decision making processes. The Notice of Motion can therefore be closed, but additional actions related to it will continue to be progressed and reported to the committee. These additional actions are not contained in this report, but will be noted in the live database moving forward. • Category 2 - Notices of Motion have become Council policy or absorbed in to a strategic programme of work. These Notices of Motion did not contain a specific task that could be complete. Instead, they were more strategic in nature and required changes in Council policy and/ or strategy for long term outcomes. Those listed within this category have all been agreed by Committee and are now either Council policy or are currently being implemented through a Council strategy that is managed by a Standing Committee through the corporate planning process. <p>Following an update of those Notices of Motion and Issues Raised in Advance on the live database, it is recommended that Members approve the following Motions/Issues for closure.</p> <p>Category 1 Recommended Closures:</p> <ul style="list-style-type: none"> • Future Fossil Fuel Development (No 26) - the Member has been provided with an update on this request and is content with the advice provided. This issue is now recommended for closure. • Portacabin at Wedderburn (No 32) – request withdrawn by Member. • Proposal for pedestrian crossing at new BCC play park on Upper Dunmurry Lane (No 38) - correspondence has been issued to DfI with a formal request for pedestrian crossing on Upper Dunmurry Lane beside the BCC carpark.
-----	---

	<u>Financial & Resource Implications</u>
3.6	There are no additional financial implications required to implement these recommendations.
	<u>Equality or Good Relations Implications/Rural Needs Assessment</u>
3.7	There are no equality, good relations or rural needs implications contained in this report.
4.0	Appendices – Documents Attached
	Appendix 1: Notices of Motion Live Database – P&C Committee

This page is intentionally left blank

Notice of Motion – Live Database

Belfast

Ref	Type	Date of Council Meeting	Motion (including hyperlinks)	Proposed by	Referral route	Cttee	Agreed actions (agreed decisions from committee/ Council)	Lead officer	Department	Status	Status Update
12	Notice of Motion	03/12/2018	Lighting of City Parks	CLlr McDonough-Brown	Referred to P&C	P&C		R Black	City & Neighbourhood Services	Ongoing	Work on this motion is ongoing. Work to re-start shortly in relation to a feasibility study to consider the lighting requirements for Council parks.
15	Notice of Motion	04/02/2019	Recycling in Colin Neighbourhood	CLlr Walsh	Referred To P&C	P&C		S Toland	City & Neighbourhood Services	Ongoing	A report on the future of recycling options has been received and was presented to Waste Programme board in 8 Nov 21. Report has been circulated to and considered by CMT 22 Nov 21. Approach will be to engage with Party Groupings in due course to take soundings before presentation to Committee.
22	Notice of Motion	01/07/2019	Glyphosate-Based Weed killer	CLlr Ferguson	Referred to P&C	P&C		R Black	City & Neighbourhood Services	Ongoing	Report to be presented to People & Communities committee in January 22.

26	Issue raised in advance	06/08/2019	Future Fossil Fuel Development	CLlr Smyth		P&C		J Walsh	Legal & Civic Services	Recommendation Close	The Member has been provided with an update on this request and is content with the advice provided. This issue is now recommended for closure.
27	Notice of Motion	02/09/2019	Play Facilities for children with Disabilities	Ald McCoubrey	Referred to P&C	P&C Cttee		R Black	City & Neighbourhood Services	Ongoing	Work on this motion is ongoing.
30	Notice of Motion	02/09/2019	Rewilding our Wards	CLlr Garrett	Referred to P&C	P&C Cttee		R Black	City & Neighbourhood Services	Ongoing	OSS Service is currently identifying possible sites for this project.
32	issue Raised in Advance	08/10/2019	Port-a-cabin at Wedderburn Park	CLlr Graham	IRIABM	P&C Cttee		R Black	City & Neighbourhood Services	Recommendation Close	Request withdrawn.
38	Issue Raised in Advance	14/01/2020	Proposal for Pedestrian Crossing at new BCC Play Park on Upper Dunmurry Lane	CLlr Michael Collins		P&C		R Black	City & Neighbourhood Services	Recommendation Close	Correspondence issued to DfI with formal request for pedestrian crossing on Upper Dunmurry Lane beside BCC carpark.
46	Notice of Motion	03/02/2020	Graffiti	CLlr Nicholl	Straight to Committee	P&C		S Toland	City & Neighbourhood Services	Ongoing	Draft graffiti policy being considered, in order to agree the sope and responsibility of Council. Anti-Graffiti Strategy to be progressed when resources are available..

47	Notice of Motion	03/02/2020	Irish Language Street Signage Policy	Cllr Walsh	Straight to Committee	P&C	Proposed changes to the dual language section of the Street Naming Policy have been agreed at SP&R and ratified by Council. The process to amend the policy has now moved to public consultation stage.	J Walsh	Legal & Civic Services	Ongoing	<p>The dual language section of the Street Naming Policy is now out for public consultation. The consultation is scheduled to close on 28 February 2022.</p> <p>This proposed policy has been screened in for an Equality Impact Assessment, which is running in tandem with this public consultation.</p>
48	Notice of Motion	03/02/2020	Historic Graveyards	Cllr McAteer	Straight to Committee	P&C		S Toland	City & Neighbourhood Services	Ongoing	<p>Impacted by COVID. Requirements 1. SLA to be developed between OSSS and Bereavement for maintenance. 2. Memorial Inspection programme re-instated. 3 Tour Protocol under development with Tourism Section . Update to P&C in Spring 2022.</p>
63	Notice of Motion	02/03/2020	School Uniform Exchange	Cllr McReynolds	Debated at Council	P&C		R Black	City & Neighbourhood Services	Ongoing	Deferred due to Covid, to be considered at a later date when resources are available
76	Notice of Motion	01/07/2020	Littering	Cllr Groogan	Straight to Committee	P&C		R Black	City & Neighbourhood Services	Ongoing	To be taken forward as an action under BOSS.

89	issue Raised in Advance	11/08/2020	Future Use of former Horticultural Training Site	CLlr Garrett		P&C		R Black	City & Neighbourhood Services	Ongoing	Officers to arrange site visit with CLlr Garrett in December 21.
123	Notice of Motion	02/11/2020	Support for Young People and Students	CLlr Nicholl	Straight to Committee	P&C		R Black	City & Neighbourhood Services	Ongoing	The Members who proposed the motion have been provided with proposals, their feedback on how to take forward in a focused manner is awaited.
124	Notice of Motion	02/11/2020	Belfast City Council Cycling Champion	CLlr McReynolds	Straight to Committee	P&C		A Reid	Place & Economy	Ongoing	Officers are continuing to work on options for addressing the NoM and will bring back for agreement in the near future.
145	Notice of Motion	07/01/2021	Creating Better Access into the Hills	CLlr Donnelly	Straight to Committee	P&C		R Black	City & Neighbourhood Services	Ongoing	To be picked up under Social and Community Recovery when post-Covid service resumes. An update report will be presented to P&C in due course.
146	Notice of Motion	07/01/2021	30 by 30 Biodiversity Campaign	CLlr Smyth	Straight to Committee	P&C		R Black	City & Neighbourhood Services	Ongoing	To be progressed as resources become available.
159	Issue Raised in Advance	12/02/2021	CCTV Equipment CS Lewis Square and to consider the CCTV needs for the remainder of the Greenway	CLlr Newton		P&C	report to come back to P&C re CCTV equipment and letters to be sent to DfI Minister and Chief Executive of Transport NI re gritting	R Black	City & Neighbourhood Services	Ongoing	Deferred given workload pressures associated with Covid. Officers have advised the Member that this issue will be taken forward when staff and budget resources are available. An update on a DfI response in regard to gritting was provided to P&C in March 21.

160	issue Raised in Advance	12/02/2021	Colaiste Feirste and Divis Back Path	CLlr Beattie		P&C	report to come back to P&C Committee	R Black	City & Neighbourhood Services	Ongoing	Programming of Divis Back Path ongoing. Recent decision by P&C to provide bridging support to Colaiste Feirste being worked through while review ongoing.
161	Notice of Motion	01/03/2021	Belfast Hills "Call to Action" document	CLlr Matt Collins	Straight to Committee	P&C		R Black	City & Neighbourhood Services	Ongoing	To be picked up under Social and Community Recovery when post-Covid service resumes. An update report will be presented to P&C in due course.
182	Notice of Motion	04/05/2021	Recent Violence and Public Disorder	CLlr Smyth	Straight to Committee	P&C		R Black	City & Neighbourhood Services	Ongoing	June's meeting. At the time that there were already a number of age appropriate meaningful multidisciplinary interventions in place e.g. the Summer Of Play Programme and the specific interventions from Integrated Early Years workstream. Part of this activity included a number of ad hoc, rapid response spends, identified via FS hubs/ LPG and BAOG activity. BAOG will continue to look at the issues and the needs of Children and young people in the city as part of the mandate from the Living here Board to explore Integrated design and implementation of
205	Notice of Motion	04/10/2021	Tsar for the Holyands Area	CLlr Groogan	Debated at Council	P&C		R Black	City & Neighbourhood Services	Ongoing	Responses received from both universities, awaiting response from Exec office.
218	Issue Raised in Advance	12/10/2021	City Centre Safety for Women	CLlr Black	Issue Raised in Advance	P&C		R Black	City & Neighbourhood Services	Ongoing	A report will be presented to P&C in Feb 2022 to update on issues discussed.



Subject:	Boxing Strategy Quarterly update
Date:	7 December 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Cormac McCann, Lead Officer Community Provision

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	This report is to provide an update on progress on implementation of Belfast Boxing Strategy for July to September 2021.
2.0	Recommendations
2.1	The Committee is asked to: <ul style="list-style-type: none"> Note the progress to date.
3.0	Main report
3.1	<p>Background</p> <p>Council agreed, through the January 2018 Strategic Policy and Resources Committee, to provide £200,000 to the Irish Athletic Boxing Association Ulster Branch (IABA) for delivery of an agreed annual action plan supporting the Belfast Boxing Strategy.</p>

3.2	The IABA provided SP&R with a detailed breakdown of programmes to be delivered under six main areas. Salary – Development Officer and Coaches, Pathways, Events, Coach Education, Club Support, Governance.
3.3	Following this decision the Belfast Boxing Strategy Steering Group has met quarterly. This Steering Group is chaired by the Director of Neighbourhood Services with Council Officers, IABA Officers and Officials and Co. Antrim Board Officials attending. Small variations to the budget across the six areas have been agreed to assist prioritisation in line with the agreed annual action plan.
	Monitoring
3.4	The Leisure Development Unit works directly with IABA officials to verify reporting on performance and finance and provides detailed reports for discussion at the Steering Group.
	Performance
3.5	Council agreed a total of 37 Indicators with IABA to monitor delivery of the programmes. IABA have complied with reporting requirements and their performance report 2021 – 2022 for Q2 alongside year to date performance is included at Appendices 1. IABA have provided narrative against each of the KPIs to describe progress against each indicator and plans to ensure that all targets are achieved at year end. Whilst the performance reports indicate significant underperformance against most targets, it is important to note that participation in boxing, as a full contact indoor, has been heavily restricted under the Covid19 restrictions. IABA have mitigated against this by modifying delivery of many elements to online methods. Members should also note that the 2021 – 2022 action plan was developed to take account of restrictions and with this in mind many of the indoor contact-based elements are programmed into Q3 and Q4 of this financial year.
	<u>Financial & Resource Implications</u>
3.6	A total of £200,000 is available within the current financial year to support the Action Plan.
	<u>Equality Impact/Rural Needs Assessment</u>
3.7	The strategy was equality screened in line with the Council's equality process. The screening showed that there were potential adverse impacts on a number of groups including females and people with a disability and mitigating actions were added to the strategy. Members agreed that an equality screening be undertaken prior to a decision being made in relation to funding for 19/20. Officers have finalised this screening and initial findings show that progress has been

	made in increasing the participation of underrepresented groups and this has been reported separately through the Strategic Policy and Resources Committee. The IABA continue to target underrepresented groups in its delivery of the 20/21 programme with particular focus on the events and non-contact programme. IABA have also advised that the three Belfast clubs which had been affiliated to the Northern Ireland Boxing Association (NIBA) have re-joined the IABA and are now in a position to be fully supported through the Strategy action plan and Council Sports Development funding.
4.0	Appendices – Documents Attached
	Appendix 1 - IABA 2021 – 2022 Q2 and YTD Performance Report

This page is intentionally left blank

Boxing Strategy KPI Report 21-22 Quarter 2 and Year to Date performance

To have an effective efficient Pathway to engage and nurture talent within Belfast

KPI	Description	Q2 Female	Q2 Male	Q2 Total	YTD Female	YTD Male	YTD Total	Commentary
1.1	Run talent ID testing for 3 Belfast squads	0	0	0	0	0	0	No competitions have been ran yet a timetable in place from mid october. Meeting with IFA Academy Head set for October.
1.2	Run 3 talent squads in Belfast	0	0	0	0	0	0	No competitions have been ran yet a timetable in place from mid october. Meeting with IFA Academy Head set for October.
1.3	Run competitive opportunities for Belfast talent squads	0	0	0	0	0	0	No competitions have been ran yet a timetable in place from mid october. Meeting with IFA Academy Head set for October.
1.4	Number of boxers on Elite gym membership	0	0	0	0	0	0	Still waiting on scheme to open up via GLL
1.5	Number of boxers obtaining support for sport	0	6	6	0	6	6	6 boxers have applied to Mary Peters Trust for grant aid (Star, Holy Trinity, Emerald)
2.1	30 clubs at volunteer education event			0			0	We hope to run this in Q3/4 when larger gatherings are allowed.
2.2	30 clubs at volunteer recognition event			0			0	We hope to run this in Q3/4 when larger gatherings are allowed.
3.1	10 officials trained on scoring system	0	12	12	0	12	12	12 Belfast Officials attended Ulster R&J refresher course clubs included (Star, St Pauls, Emerald, Saints, Clonard, Ormeau Road, St Michaels, Corpus Christi.)
3.2	20 new referees and judges trained	0	0	0	0	0	0	No new R&J course has been sanctioned by Sport Ireland as yet
3.3	20 committee members trained on best practice	3	10	13	11	23	34	6 clubs took part in online safeguarding course (St Pauls, Gleann, Holy Family, Midland, Newington, Ledley Hall). Mental Health online workshop 2 completed (Holy Trinity & Cairn Lodge). UBC Protocols training return to sport (Ormeau Road , Star, Clonard, Holy Family, Corpus Chrisit).
To recruit, train and sustain active coaches within Belfast								
4.1	5 coaches receive talent coach training and mentoring	1	4	5	1	4	5	5 Coaches on Sport NI and UHP coaching pathway programme. (Star, Ledley Hall, Emerald, Gleann, Holy Family).
4.2	20 new grassroots coaches trained			0	0	0	0	No coaching courses have been approved for delivery by sport ireland yet.
4.3	50 new people accessing online resources			32	8	14	54	32 All clubs watched new affiliation video and training on new systems online. 1 still to affiliated but currently having new club premises built (Tullycarnet). Have met with the club and assisted.
4.4	Increase the number of female coaches - EBA2020	0		0	0		0	No coaching courses have been approved for delivery by sport ireland yet.
4.5	5 clubs trained on inclusive boxing module			0			0	Disability Sport Need to meet in person to do this and will hopefully meet soon as currently working from home.
To grow and sustain club membership within Belfast								
5.1	120 participants at come and try it event	0	0	0	0	0	0	Schools are not allowed to mix we are going to try and run community sports days. 1 in each part of the city before christmas.
5.2	1200 pupils taking part in non contact boxing	150	275	425	460	665	1125	175 participants in summer programme included (Glenparent YC, Start Smart, Whiterock LC, Ardoyne YC, Brooke LC). 250 Participants Schools Programme in September (Malone College, Holy Evangelist PS, St John the Baptist PS). Finaghy PS & St Josephs College have been added to programme for October currently have meetings booked in with Hazelwood, Trinity College & Ashfield Boys & Girls).

5.3	120 participants at Belfast Day of Boxing	0	0	0	0	0	0	We will try and run this when schools are allowed to mix again. Linking in with the EA on this.
5.4.1	2 new clubs availing of seeding grant			0			0	This will run out over Q3/4
5.4.2	4 clubs obtaining equipment grants			0			0	This will run out over Q3/4
5.4.3	22 clubs obtaining membership growth			0			0	hope to run this over Q3 & Q4
5.4.4	30 clubs deliver Community Partnership - diversionary			23			0	23 Clubs took part in Summer Reboot Programme (Star, Emerald, Saints, Oliver Plunkett, Clonard, Holy Family, Holy Trinity, Midland, Eastside, Ormeau Road, Immaculata, Gleann BC, St Agnes, Dockers, Corpus Christi, St Michaels, Ardoyne, Bosco, Mc Cullagh's, St Pauls, Ligoneil, Cairn Lodge, Ballysillan).
5.5	8 clubs receiving for support for sport grants			10			20	10 Clubs received Summer funding from BCC to run boxing camps (Ledley Hall, Bosco, Dockers, St Pauls, Gleann, Corpus Christi, Kronk, Immaculata, Saints Midland).
5.6	180 participants in holiday camps			0	0	0	0	Will run this in Q3 should mixing be allowed.
5.7	Number of new members in Belfast clubs			0	0	0	0	Medical day for new members on 16th October 2021
To promote and sustain good governance standards within Belfast clubs								
6.1	2 clubs to attain clubmark accreditation			0			0	Meetings with Immaculata & Dockers work ongoing.
6.2	180 participants in good relations programme			0	0	0	0	No current mixing of schools or groups allowed hope to run in Q3&4
Funding to support competitive local and international events in Belfast								
7.1	Number of local events			0			0	Events calendar due to start in mid October.
7.2	Number of international events			0			0	Events calendar due to start in mid October.
7.3	Number of male competitors			0	0	0	0	Events calendar due to start in mid October.
7.4	Number of female competitors			0	0	0	0	Events calendar due to start in mid October.
7.5	Number of visiting competitors			0	0	0	0	Events calendar due to start in mid October.
7.6	Number of Belfast competitors			0	0	0	0	Events calendar due to start in mid October.
7.7	Number of visiting officials			0	0	0	0	Events calendar due to start in mid October.
7.8	Number of Belfast officials			0	0	0	0	Events calendar due to start in mid October.



Subject:	Representation on Association of Port Health Authorities Executive Board
Date:	7 December 2021
Reporting Officer:	Siobhan Toland, , Director of City Services, City & Neighbourhood Services Department
Contact Officer:	David Cuthbert, City Protection Manager, City & Neighbourhood Services Department

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	The purpose of this report is to update Members on recent changes made by the Association of Port Health Authorities (APHA) to their processes for regional representation onto the Association's Executive Board. Belfast City Council previously provided an Elected Member representative to this Board, however going forward, in line with APHAs requirements, this role will be undertaken by a nominated officer from the NI Ports Liaison Area Network.
2.0	Recommendations
2.1	<p>The Committee are asked to:</p> <ul style="list-style-type: none"> Note the report and change from Elected Member to Officer representation.

3.0	Main report
	Background
3.1	The Association of Port Health Authorities (APHA) is a UK wide organisation representing the interests of Local Authorities and Port Health Authorities which have responsibilities for public, animal and environmental health controls at sea and airports.
3.2	Belfast City Council is a corporate member of the Association, and following Local Government elections in 2019, Councillor Brian Heading was nominated as a regional representative to the APHA Board for a 2 year term, in November 2019. This 2 year term finished at the end of November 2021.
3.3	At the time of previous nomination in 2019, membership of APHA's Executive Board typically comprised of a mix of both officers from some Councils/Port Authorities and a small number of Elected Member representatives from 8 regions around the UK.
	Key issues
3.4	In November 2019, APHA adopted an updated version of its 'Articles of Association', and subsequently made revisions to its 'Operating Arrangements' in April 2020. These revisions updated arrangements for regional representation to the APHA Board, specifically that Board representation would be invited from each of the 6x Ports Liaison Area Network (PLaN) groups, with appointments for an annual (1 year) term. <i>(Copies of the Articles of Association and Operating Arrangements documents can be made available to Members on request).</i>
3.5	As a result of these changes there are now no Elected Member representatives on the Board from any UK region, instead Officer representatives have been nominated from the regional PLaN groups.
3.6	The Northern Ireland Port Liaison Area Network group is scheduled to meet in early December 2021 and will be asked to nominate a NI regional representative to the APHA Board. Given Belfast has the largest Port with associated Port Health expertise, it is anticipated that the NI PLaN members may request that a Belfast City Council Officer undertake this role.
3.7	Whilst this will necessitate a Belfast City Council Port Health Officer to attend Board meetings to participate, this has generally already been the case in supporting the Elected Member Representative (Cllr Brian Heading) in this role over the past number of years. Board meetings are held 3 times per year and last around 3 hours. Over the past 2 years these meetings have

	been held virtually online, however prior to the Covid-19 pandemic these meetings took place at the offices of the Association in London.
3.8	<p>APHA membership continues to present benefits for Belfast City Council, particularly at an operational and peer learning level . Officer participation will provide helpful insight into emerging issues and best practice in other Ports, while also affording an opportunity for NI and Belfast Port Health issues to be advocated and considered at a UK level.</p> <p><u>Finance and Resource Implications</u></p> <p><i><u>Financial</u></i></p>
3.9	<p>There are no additional financial implications arising from this report. Costs of the Council's membership and attendance at Board meetings etc are being met within existing budgets and Port Health team resources.</p> <p><u>Equality or Good Relations Implications/ Rural Needs Assessment</u></p>
3.10	<p>There are no equality, good relations or rural needs implications as a result of this report.</p>
4.0	Appendices – Documents Attached
	None

This page is intentionally left blank



Subject:	Update - The Queen's Green Canopy (QGC) Tree Planting Initiative celebrating the forthcoming Queen's Platinum Jubilee and a request for Belfast City Council to submit an application for consideration to become a (QGC) Champion City
Date:	7 December 2021
Reporting Officer:	Ryan Black, Director Neighbourhood Services
Contact Officer:	Stephen Leonard, Neighbourhood Services Manager

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	To update members regarding the planned Queen's Green Canopy tree planting event in Belmont Park which was agreed at the People and Communities committee meeting on the 10 th August 2021 and ratified on the 7 th September 2021; where 500 small native trees will be planted between November 2021 – March 2022 and a plaque installed to mark the occasion.
1.2	To update Members of a subsequent request received by Council from Colonel Dan Rex MVO, CEO asking the Council to consider submitting an application to becoming a Champion City under the (QGC) initiative.

2.0	Recommendations
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> Note the content of this report by way of update.
3.0	Main Report
3.1	At the People and Communities Committee meeting on the 10 th August 2021 Members were asked to consider a request received from Colonel Dan Rex MVO, CEO to the Queen's Green Canopy, inviting Belfast City Council to celebrate Her Majesty's Platinum Jubilee and at the same time, promoting the importance of trees to the environment by planting trees in one of our Parks.
3.2	<p>Members agreed that:</p> <ul style="list-style-type: none"> There would be one (QGC) tree planting event proposed for Belmont Park, where 500 small native trees would be planted between November 2021 – March 2022 in the lead up to the Platinum Jubilee celebrations. That all 500 trees planted as part of the (QGC) event would automatically be added to the Council's One Million Tree planting running total. The Council's Outreach officer for east Belfast, work with local community groups and plan/oversee the proposed (QGC) event. Agree to the installation of one small (QGC) at the Belmont Park planting site.
3.3	The above recommendations were ratified on 7 th September 2021.
3.4	Members are advised of a subsequent request received from Colonel Dan Rex MVO, CEO to the Queen's Green Canopy, inviting the Council to consider submitting an application to become a Champion City under the (QGC)
3.5	<p>The Champion City goals are:</p> <ol style="list-style-type: none"> To inspire Cities and encourage proactive community engagement within urban environments around the UK. To promote the importance of urban trees and woodland, and the benefits they bring to mental health, physical health, air quality, flood defences, microclimate and more.

	<p>3. To exemplify best practice and the core principles of the (QGC) including stewardship, inclusivity and education.</p>
3.6	<p>The (QGC) panel have asked that any city offered Champion City Status will commit to:</p> <ol style="list-style-type: none"> 1. Actively promote engagement with the (QGC) and its goals 2. Arrange an iconic tree planting which emphatically embody the spirit of the (QGC) 3. Ensure an ongoing maintenance plan for trees planted under the (QGC) initiative.
3.7	<p>As a result of the short deadline for submissions in advance of National Tree Week which runs from the 27th November to the 5th December 2021, a presentation was made to Party Group Leaders on the 11th November 2021 to enable a decision to be made under delegated authority to submit an application to become a (QGC) Champion City, and an application was swiftly forwarded to the (QGC) panel for consideration due to the time limit.</p>
3.8	<p>The outcome of the Council's application was that we were successful and have been selected as one of the (QGC) Champion Cities along with other cities such as Manchester, Leicester, Cardiff, Edinburgh, Glasgow, Newcastle, Southampton, and York. (See appendix 1 - QGC Champion Cities Media Release 16th November 2021).</p>
3.9	<p><u>Financial & Resource Implications</u></p> <p>None – Tree planting at Belmont Park will come out of the existing/annual tree planting budget.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p>
3.10	<p>None</p>
4.0	<p>Appendices – Documents Attached</p>
	<p>Appendix 1 – QGC Champion Cities Media Release 16th November 2021.</p>

This page is intentionally left blank



****FOR IMMEDIATE RELEASE****

THE QUEEN'S GREEN CANOPY – 10,000 TREES FOR NATIONAL TREE WEEK 2021

27th November - 5th December

The Queen's Green Canopy (QGC) will unveil two key initiatives during National Tree Week this month – a community led project to plant 10,000 trees in Bradford, and the launch of a QGC "Champion Cities" initiative.

On Saturday, 27th November at Newhall Park in Bradford, the QGC will come together with the local community, schools and voluntary groups of all ages **to plant 10,000 trees** as part of the Council's "Tree for Every Child" programme. Working in partnership with Trees for Cities and the City of Bradford Metropolitan Council, the QGC is continuing its programme to support urban greening in areas of high socioeconomic deprivation and low canopy cover.

Further details will be announced closer to the time. This follows the successful delivery of the QGC's first urban greening project in Tower Hamlets in October. The QGC and Trees for Cities will deliver projects in all four nations of the UK as part of the Platinum Jubilee year.

The QGC will also launch a "Champion Cities" initiative with **Greater Manchester** and **Leicester** hosting community events on the 4th and 5th December, to highlight the leadership, dynamism, and influence of some of the nation's outstanding cities which have trees and woodland as a central part of their plans for green spaces.

Other UK cities which have been awarded QGC "Champion" status so far include **Belfast, Cardiff, Chester, Edinburgh, Glasgow, Newcastle, Preston, Swansea, Southampton, Worcester and York.**

The QGC looks forward to hosting events to celebrate each Champion City in due course.

Background

As part of its work to highlight urban greening initiatives, the QGC invited cities from across the United Kingdom to apply for "Champion City" status. The initiative seeks to celebrate UK cities which have trees and woodlands as a central part of their plans for green spaces, for example in the form of a dynamic green recovery plan or green city charter, as well as community-oriented environmental projects.

Through plans to plant three million trees, **Greater Manchester** has set an ambitious target of being carbon neutral by 2038. The city has developed strong green infrastructure coordination across the 10 Greater Manchester districts, which include some of the most socioeconomically deprived regions in the country.

Leicester City Council's commitment to maintaining and replenishing its 153,000 trees and 109 hectares of woodland is set out in its Tree Strategy. The council plans to plant more than 7,500 trees during this autumn/winter planting season, supported by its volunteer tree wardens and dozens of community volunteers.

The Queen's Green Canopy

The Queen's Green Canopy (QGC) is a unique tree planting initiative created to mark Her Majesty's Platinum Jubilee in 2022 which invites people from across the United Kingdom to **"Plant a Tree for the Jubilee"**.

Everyone from individuals to Scout and Girlguiding groups, villages, cities, counties, schools and corporates will be encouraged to play their part to enhance our environment by planting trees during the official planting season between October to March. Tree planting will commence again in October 2022, through to the end of the Jubilee year.

With a focus on planting sustainably, the QGC will encourage tree planting to create a legacy in honour of The Queen's leadership of the Nation, which will benefit future generations.

As well as inviting the planting of new trees, *The Queen's Green Canopy* will dedicate a network of 70 Ancient Woodlands across the United Kingdom and identify 70 Ancient Trees to celebrate Her Majesty's 70 years of service.

By inviting everyone to plant considerable numbers of new trees throughout the country, the QGC seeks to highlight the significant value of trees and woodlands as nature's simple but highly effective way to clean the air we breathe, slow the impact of climate change, create important wildlife habitats and improve our general health and wellbeing.

- Throughout Her reign, The Queen has planted more than 1,500 trees all over the world and has spoken alongside Sir David Attenborough of the importance of trees in the Earth's future.
- The QGC is a voluntary and inclusive initiative which is open to participation by everyone in the UK.
- The QGC is a symbolic gift which involves the voluntary dedication of forests and woodland – there is no land/title transfer.
- The QGC is a not-for-profit initiative, which has not received Government funding.

Further information about the QGC is available: www.queensgreencanopy.org

The Queen's Green Canopy Partners

Collaboration is central to the QGC. We are proud to work with our partners **Cool Earth, The Royal Horticultural Society, The Woodland Trust, Trees for Cities, The Forest Canopy Foundation and DEFRA, The Tree Council, The Conservation Volunteers and the Community Forest Trust.**

The Queen's Green Canopy – Platinum Supporters

The QGC is grateful to be working with a select group of Platinum Supporters: **Royal Mail Group, Coutts, John Lewis & Partners, Waitrose & Partners, Rentokil Initial, Coupa, Regatta and Craghoppers, Bridgepoint, Howdens, Johnnie Walker, McDonald's UK & Ireland.**

We are also pleased to be working with **Bags of Ethics by Supreme Creations as an Official Supporter.**

The Queen's Green Canopy – QGC Friends Network

A diverse collection of groups located across the UK, our Friends Network is supporting the QGC, from planting trees to helping inspire the nation to get involved.

Capel Manor College	National Trust
Country Land & Business Association (CLA)	National Trust for Scotland
Clyde Climate Forest	Natural England
Commonwealth War Graves Commission	Natural Resources Wales
Community Woodlands Association (CWA)	National Farmers Union Scotland
DAERA NI	Royal Botanic Gardens, Edinburgh
Earthwatch Europe	Royal Botanic Gardens, Kew
Eden Project	Royal Forestry Society
EDT Industrial Cadets	Royal Scottish Forestry Society
English Heritage	Royal Warrant Holders Association
Forestry and Land Scotland	Scotland's Finest Woods Awards
Forestry Commission	Scottish Forestry
Green Action Trust	Scottish Land & Estates
Historic Houses	SUGi
HighGround	The Crown Estate
Horticultural Trades Association (HTA)	The National Forest
National Association of Civic Officers (NACO)	The Royal Parks
National Farmers Union (NFU)	The Wildlife Trusts
	Welsh Government

QGC social media channels

Instagram: @queensgreencanopy

Twitter: @QGCanopy

Facebook: @queensgreencanopy

LinkedIn: @queensgreencanopy

Hashtags: #queensgreencanopy #plantatreeforthejubilee #jubileetree

Notes to Editors

Further details about the events and timings for the media will be announced in coming weeks.

Please contact Marnie Gaffney at The Queen's Green Canopy in the meantime.

Media Contact

Marnie Gaffney MVO

Head of Communications, The Queen's Green Canopy

marnie.gaffney@queensgreencanopy.org

+447793266675



Subject:	External Consultations on: Northern Ireland Food Strategy Framework WEEE Compliance Scheme Methodology Reduction of Single-Use Plastic Beverage Cups and Food Containers
Date:	7 th December 2021
Reporting Officer:	Cathy Matthews Operations Director, Resources and Fleet
Contact Officer:	John McConnell City Services Manager Resources and Fleet

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	<p>The purpose of this report is to provide the Committee with an update on recent and current consultations which may have an impact on Waste, namely</p> <ul style="list-style-type: none"> the Northern Ireland Food Strategy Framework the WEEE Compliance Scheme Methodology. The Reduction of Single-Use Plastic Beverage Cups and Food Containers.

2.0	Recommendations
2.1	<p>The Committee is asked</p> <ul style="list-style-type: none"> • To note the draft response to the Northern Ireland Food Strategy Framework subject to council ratification. (Consultation paper as Appendix I and Draft response as Appendix II) • To note the proposed approach to the WEEE Compliance Scheme Methodology • To invite members to comment in advance of the submission on the DAERA consultation for the Reduction of Single-Use Plastic Beverage Cups and Food Containers and to forward any comments for consideration for inclusion in the response from Belfast City Council by Monday 13th December 2021 to Jennifer Stephens Waste Officer stephensj@belfastcity.gov.uk The consultation document is attached at Appendix III.
3.0	Main report
	<u>Key Issues</u>
3.1	<p>A summary of each of the consultations is provided below:</p> <p>(1) Northern Ireland Food Strategy Framework</p>
3.2	<p>The Department of Agriculture, Environment and Rural Affairs (DAERA) recently published a consultation on a draft Northern Ireland Food Strategy Framework. The document presented proposals for a new strategic food systems approach for Northern Ireland, and on the proposed vision, principles and goals of the Framework. Subject to the outcome of the consultation exercise, it is anticipated that an agreed Framework will be published in early 2022.</p>
3.3	<p>DAERA highlights that there is growing international acceptance of the interconnectedness between food, health and the environment. It notes that there is an expectation that a food system should ensure environmental, social and economic sustainability and also that there is also a growing interest in sustainable healthy diets.</p>
3.4	<p>The draft Northern Ireland Food Strategy Framework recognises the interconnectedness around food and proposes a strategic food systems approach. It sets out a long-term</p>

	vision, high level principles and areas for strategic focus to optimise cross-departmental working on food matters in Northern Ireland to deliver Programme for Government and departmental objectives. The vision is a transformed food system that protects natural resources for future generations, is economically and environmentally sustainable and provides safe, nourishing, accessible food to people.
3.5	DAERA has been leading on the development of the cross-departmental Framework with input from other Departments and a wide range of external stakeholders.
3.6	<p>During the development process six strategic priorities were identified:</p> <p>Priority One: Building connections between health /wellbeing and food</p> <p>Priority Two: Building Sustainable Economic Prosperity</p> <p>Priority Three: Building a Food Culture and Food Conscious Society</p> <p>Priority Four: Protecting and Enhancing our Natural Resources</p> <p>Priority Five: Building Healthy Lives through Food Education</p> <p>Priority Six: Building and maintaining appropriate Emergency Contingency plans across the supply chain.</p>
3.7	<p>Following the development process, DAERA launched a public consultation in order to seek views on this new collaborative approach under a Northern Ireland Framework from across a much broader range of stakeholders and the general public.</p> <p>The Consultation launched on Friday 24 September 2021 and closed on Friday 19th November 2021. The consultation presented 24 questions relating to the proposed Food Strategy Framework.</p>
3.8	A copy of the Consultation document is attached as Appendix I.
3.9	A copy of our draft response to the consultation is attached as Appendix II. The response has been provided pending People and Communities Committee and full Council further input and authorisation.
3.10	Generally speaking, we are supportive of the proposals contained within the consultation, including a “whole of government approach” which will align policies that affect the food system. We do note in our response that if the NI Food Strategy Framework aims to be a cross government unifying strategy, it should be mindful of the work currently being

	undertaken by DAERA in relation to waste (For example, in developing a Waste Collections Consistency Framework).
3.11	Within our response, we emphasise the importance of a life-cycle approach and we propose a “soil-to-soil” principle, (going beyond the farm-to-fork concept), incorporating a closed loop food system approach. We reference the Circular Economy, pollution, ecosystem services, climate change and EU exit as issues which need to be considered within the new Framework. We also note the omission of linkages to the new NI Biodiversity Strategy and to existing legislation such as the Habitats Directive and Water Framework Directive.
3.12	It is noted that our responses to the consultation questions are mainly from a waste perspective and that they also include comments relating to Biodiversity issues. No other comments were received from across the Council in response to the consultation.
	(2) Waste Electronic and Electrical Equipment (WEEE) Compliance Scheme Methodology
3.13	The Department for Environment, Food & Rural Affairs (DEFRA) recently launched a four-week consultation on setting a compliance fee under the Waste Electronic and Electrical Equipment Regulations. The consultation closed on 15 th November 2021.
3.14	The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 established a system in which producers of equipment are required to finance the cost of collection, treatment, recovery and recycling of WEEE arising from private households. The WEEE Regulations introduced a system of annual collection targets that are imposed on Producer Compliance Schemes (PCSs).
3.15	This particular consultation invited views on setting a compliance fee for 2021, as well as on two proposals (from external organisations JTA and Valpak) for managing this year’s fee.
3.16	After consulting with arc21 and European Recycling Platform (ERP), who are the Producer Compliance Scheme managing WEEE collected from Belfast City Council, we note that Producer Compliance Schemes, rather than Local Authorities are best placed to respond to this consultation.

3.17	Currently, the compliance fee and any associated calculations do not affect local authorities: Belfast City Council receives WEEE collections from ERP free of charge. ERP have confirmed that the fee referred to in the consultation and its calculation will not impact the service provided by ERP and they will continue to collect WEEE free of charge from Belfast City Council.
3.18	As a major WEEE Compliance scheme, ERP has been closely involved in the development of the proposal from the JTA (Joint Trade Associations) every year since 2014 and has confirmed support of the JTA proposal for managing this year's fee.
3.19	As a result, and having taken on board comment from arc21 and ERP, it is not felt necessary for Belfast City Council to comment on this consultation.
	(3) Consultation for the Reduction of Single-Use Plastic Beverage Cups and Food Containers
3.20	The Department for Agriculture, Environment and Rural Affairs (DAERA) had published a consultation on proposals for the reduction of the usage of Single-use Plastic (SUP) beverage cups and food containers in Northern Ireland. The aim is to encourage a more sustainable environment and circular economy for everyone across Northern Ireland. The consultation has been designed collaboratively with the Waste and Resources Action Programme (WRAP) to consider a number of policy options on the most effective way to ensure a substantial reduction in the use of SUP beverage cups and food containers. The Department is seeking views on the suggested policy options to ensure the most effective method of reducing the consumption of SUP beverage cups and food containers is identified.
3.21	The goal of the policies is to reduce the use of the targeted types of SUP packaging, by encouraging wider take up of multi-use and/or single-use non-plastic alternatives. The responses to the consultation will be used to determine the best policy options to help to promote the reduction in SUP items.
3.22	Within the consultation document, three policies are modelled for both SUP beverage cups and food containers: <ul style="list-style-type: none"> • A ban on their use. • A levy of 25p on each cup and 50p on each food container; and

	<ul style="list-style-type: none"> • A voluntary scheme or schemes implemented by businesses that make use of SUP cups or food containers, which may comprise a range of charges for cups/food containers, discounts for multi-use cups/food containers and communication efforts. This is modelled as having the same effect as a 10p levy for a beverage cup and 25p for a food container.
3.23	<p>The consultation document poses 32 questions based around these policy options and invites responses by Friday 17th December 2021. Waste officers are currently examining the proposals presented within the consultation and welcome any additional comments for consideration within the council response to be received by Monday 13th December 2021. A copy of the consultation on the Reduction of Single-Use Plastic Beverage Cups and Food Containers is attached as Appendix III</p>
3.24	<p><u>Financial & Resource Implications</u></p> <p>None in relation to responding to the consultations.</p>
3.25	<p><u>Equality or Rural Needs Implications</u></p> <p>None in relation to responding to the consultations.</p>
	<p><u>Abbreviations</u></p> <p>DAERA - Department for Agriculture, Environment and Rural Affairs</p> <p>DEFRA - Department for Environment, Food & Rural Affairs</p> <p>ERP - European Recycling Platform</p> <p>JTA - Joint Trade Associations</p> <p>PCS – Producer Compliance Scheme</p> <p>SUP - Single-use Plastic</p> <p>WEEE - Waste Electrical and Electronic Equipment</p> <p>WRAP - Waste and Resources Action Programme</p>
4.0	Appendices – Documents Attached
	<p>Appendix I - Northern Ireland Food Strategy Framework Consultation</p> <p>Appendix II – BCC draft response to the Northern Ireland Food Strategy Framework</p> <p>Appendix III - Reduction of Single-Use Plastic Beverage Cups and Food Containers Consultation</p>

Northern Ireland Food Strategy Framework



Food at the Heart of our Society - A Prospectus for Change

Public Consultation Document

2021

Sustainability at the heart of a living, working, active landscape valued by everyone.



Department of
**Agriculture, Environment
and Rural Affairs**

www.daera-ni.gov.uk



**INVESTORS
IN PEOPLE**

Contents

Glossary	3
1. Preface	5
2. Introduction	7
3. What is a food systems approach?	9
4. Strategic context	11
5. Northern Ireland Food Strategy Framework	13
6. Implementation Approach	25
7. Benefits to be realised	27
8. Rural needs considerations	29
9. Equality considerations	29
10. Publication of responses	32
11. Capturing stakeholder views	33
Annex A	35
Annex B	38

Glossary

Agri-food Single Supply Chain - The movement of agricultural goods from production level to final consumer - recognising the strategic interdependence of agricultural production, food processing, retail, distribution and consumption.

Circular Economy - A circular economy is based on the principles of designing out waste and pollution, keeping products and materials in use, and regenerating natural systems. (ellenmacarthurfoundation.org).

Education - For the purpose of this consultation, education means in its broadest sense and includes early years, childcare, schools, youth settings and adults.

Food Citizenship - Shared belief that people want to and can shape the food system for the better, given the right conditions.

Food Culture - The attitudes, beliefs and practices that surround the production and consumption of food.

Food Poverty - The inability to have an adequate and nutritious diet due to issues of affordability and access to food, with related impacts on health, culture and social participation being felt.

Food System - The elements and activities that are involved in feeding a population - the production, processing, packaging, distribution marketing, consumption and disposal of food.

Food Security - When all people, at all times, have physical and economic access to sufficient, safe and nutritious food.

One Health - The collaborative efforts of multiple disciplines working locally, nationally, and globally, to attain optimal health for people, animals and our environment.

Sustainability - Meeting the needs of the present generation without compromising the ability of future generations to meet their needs. Sustainability has three components: economic, environmental, and social.

Sustainable Food System - A food system that:

- is profitable (economic sustainability);
- is beneficial for society (social sustainability); and
- has a positive or neutral impact on the natural environment (environmental sustainability).

Sustainable Diets - Are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy, while optimising natural and human resources.

Transparency in Supply Chains - For the purposes of this consultation document, transparency in supply chains includes the requirements on relevant businesses to report on their progress in relation to identifying and addressing modern slavery risks in both their operation and in supply chains.



1. Preface

The Covid-19 pandemic, EU Exit and climate change challenges are making people think and talk about food as never before. Food contributes to our regional economic prosperity and can help to address many of our most significant societal challenges. From obesity, food poverty and waste to climate change and biodiversity loss, the food we produce and eat is a major factor in some of the greatest problems facing Northern Ireland. It is also a vital part of the solutions.

There is growing international acceptance of the interconnectedness between food, health and the environment. There is also an expectation that a food system should ensure environmental, social and economic sustainability and a growing interest in the concept of sustainable healthy diets.

The proposed Northern Ireland Food Strategy Framework recognises this interconnectedness. It uses an innovative food systems approach to set a long term vision, high level principles and areas for strategic focus, which will seek to optimise cross departmental working on food matters to deliver Programme for Government and departmental objectives.

The Framework proposes a new strategic approach for Northern Ireland. It will ensure coherence across food policies that affect all our lives and help to improve economic, environmental, health and social outcomes for Northern Ireland.

Food cuts across the policy responsibilities of a number of Northern Ireland Ministers, including Agriculture, Environment and Rural Affairs, Economy, Communities, Health, Education, Finance and Justice. Although led by DAERA, the proposed Food Strategy Framework has been developed in collaboration with the other NI Departments, the Food Standards Agency NI, Invest NI, and key stakeholders. The NI Food Strategy Framework will be a dedicated programme within the Executive's Green Growth Strategy and Delivery Framework, which includes an inter-Ministerial Group chaired by the DAERA Minister. Each Department will continue to have responsibility for its respective departmental policy areas.

The Northern Ireland Executive has agreed in principle to the cross-departmental approach for a Northern Ireland Food Strategy Framework under Green Growth.

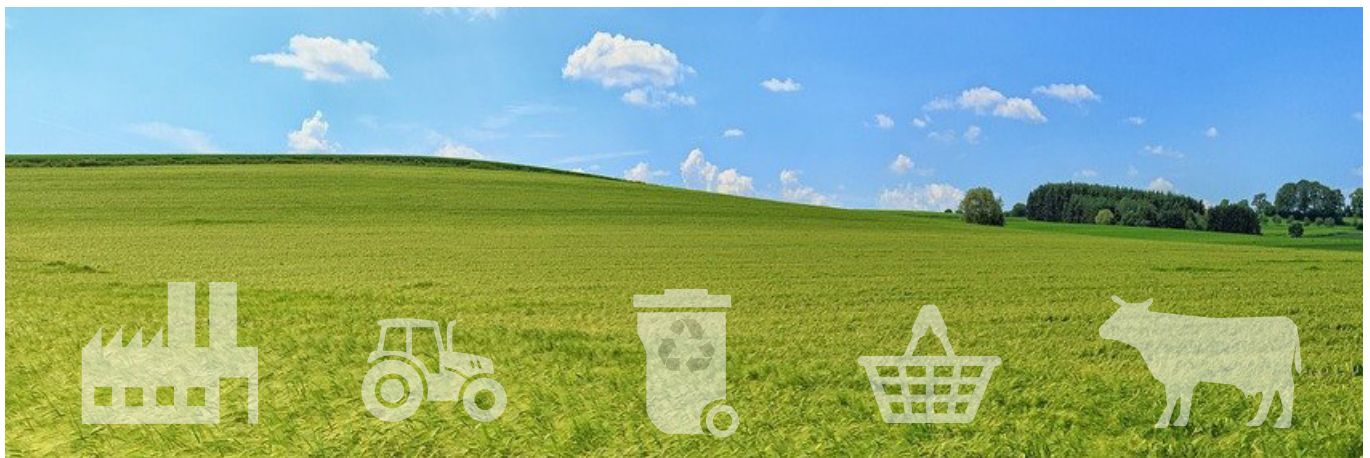
Within DAERA, a 'sister' strategy on agriculture is dealing with increased productivity, environmental sustainability, improved resilience, and supply chain integration. The new agriculture strategy will be closely linked to the Food Framework through the supply chain pillar, and will sit alongside Food as a programme within the Green Growth Framework.

The purpose of this document is to consult on the vision, principles and goals of a Northern Ireland Food Strategy Framework.

In short, the Framework sets a shared long term direction of travel for food policy in Northern Ireland. Subject to the outcome of this consultation exercise, it is anticipated that an agreed Framework will be published in early 2022.

Purpose of this consultation document

The purpose of this consultation is to seek views on a proposed Northern Ireland Food Strategy Framework.



2.0 Introduction

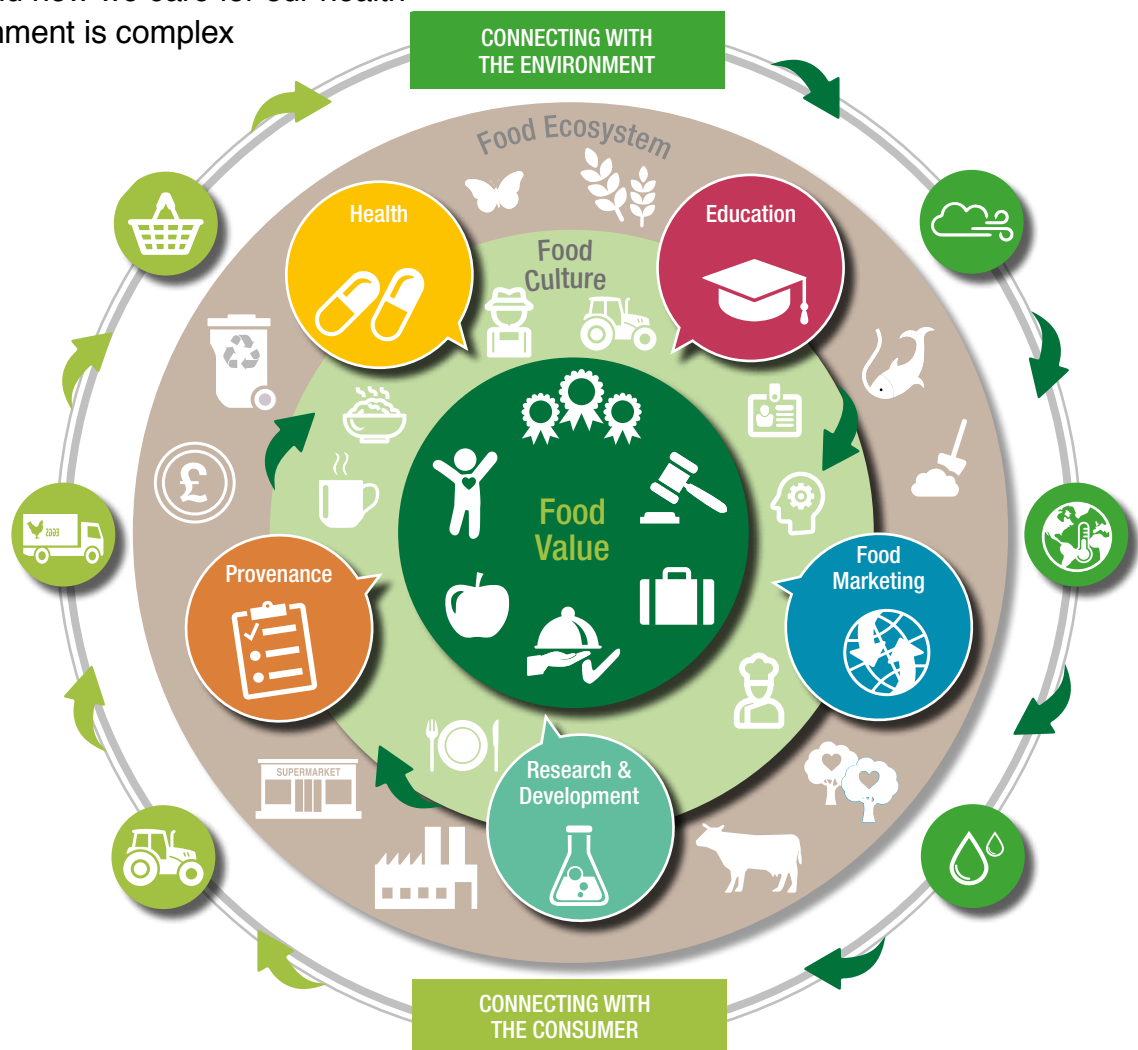
In the context of the Covid-19 pandemic, post EU Exit and climate change challenges, we have a unique opportunity to shape the future direction of our food system in ways that will benefit generations to come. This new approach on food is part of wider policy development that is underway in Northern Ireland on such strategic issues as Circular Economy, Climate, Environment, Farming, Health, Education, Skills and Science.

The rationale for government involvement in food is clear. Food is at the heart of a healthy society. During the COVID-19 pandemic we have been reminded about how much food shapes our sense of self, family, community and cultural identity. The COVID-19 crisis has brought into focus the importance of security of food supply. Looking towards COVID-19 recovery and the opportunities following EU Exit, together with changing consumer demands and new agricultural support mechanisms, we have an opportunity to transform our food system for future generations.

The social, health, environmental and economic components of our food system are interdependent but are often addressed in isolation. The relationship between how we produce and eat food and how we care for our health and our environment is complex

(Figure 1).

*Figure 1:
Relationship
between how
we produce
and eat food
and how we
care for our
health and our
environment.*



In summer 2019 in the absence of Ministers, it was agreed that DAERA would begin to explore with the Department for Economy, and other NI Departments and interested parties, the merits, scope and content of a possible Food Strategy Framework which would develop strategic alignment across NI Departments and help shape a future food system for Northern Ireland. A Food Strategy Framework will provide a structure within which government, industry, voluntary and community organisations can operate. It will allow autonomy with guidance on the direction of travel, but the flexibility to adapt to changing global trends, policy mandates, and marketplace needs.

A strategic Food Framework will help to focus collective efforts to address many of Northern Ireland's significant societal challenges. For example, providing opportunities to improve the environment, health and wellbeing, food poverty, as well as continuing to deliver regional economic prosperity and making a significant contribution to achieving many outcomes within the Programme for Government Draft Outcomes Framework.

The proposed Vision for the Framework is:

“A transformed food system that protects natural resources for future generations, is economically and environmentally sustainable and provides safe, nourishing, accessible food to people, who make informed healthy choices.”

DAERA, on behalf of the NI Executive, are developing a Green Growth Strategy and associated Climate Action Plan which will be the initial route map to climate action, green jobs and a clean environment. The timeline for the Green Growth Strategy will be 2050. The Food Strategy Framework will form part of the Green Growth Strategy and will also be long-term, but the timeline for its initial phase will be to 2030. This timeline recognises that food systems thinking is in its infancy worldwide, and there is limited experience of practical implementation to draw upon. The intention is to test whether this new approach can work successfully in Northern Ireland, and to make it better as we build experience.

A new Food Programme Board will oversee the implementation of the Northern Ireland Food Strategy Framework. The Board will be made up of representatives from all NI Departments that are responsible for aspects of food. The Board will engage with key stakeholders and will report to the inter-Ministerial Group within the governance arrangements for Green Growth. The Food Programme Board will develop a cycle of five year action plans. Review of the action plans by the Board will enable the monitoring of progress and the identification and prioritisation of future resources. This approach will ensure the Framework is dynamic and responsive to changing circumstances, while remaining loyal to the core vision of a sustainable food system.

Subject to the results of this consultation and Executive agreement, it is intended to publish an agreed cross Departmental Food Strategy Framework for Northern Ireland. Detailed implementation plans, including targets, indicators and metrics will follow. Action plans will be informed by the development of the Green Growth strategy and relevant recommendations from the Independent Strategic Review of the Agri-Food Sector (led by Sir Peter Kendall) currently taking place, together with any other related evidence and strategic frameworks under development. The 'Kendall' Review, which is expected to report in October 2021, is considering

the challenges facing both the food processing and primary agriculture industries in Northern Ireland and will make recommendations on how to take full advantage of new opportunities. We will also take account of developments elsewhere, such as the Defra-led National Food Strategy in England.

3.0 What is a food systems approach?

There have been previous Northern Ireland food strategies, each of which was developed in the context of the prevailing local and wider world circumstances. Each was time bound, with actionable tasks and, in general, a singular focus on economic growth.

The Food Strategy Framework signals a significant change in approach. Reflecting the different strategic drivers anticipated during the coming decades, the Framework seeks to build a food system that will address economic, environmental and social sustainability. It places a significant focus on the changing values and behaviours of consumers.

Currently in Northern Ireland we have many of the core components of a food strategy framework, but they function largely in isolation.

We therefore propose a Food Systems approach embracing all the elements and activities that are involved in feeding a population - the production, processing, packaging, distribution marketing, consumption and disposal of food (see Figure 2).

The food system



Figure 2: The food system.

Key to an effective Northern Ireland Food Strategy Framework is a “whole of government approach” which will align policies that affect the food system. The aim is to achieve health, environmental, social and economic goals, while ensuring that policies designed to improve one part of the food system do not undermine others.

Successful delivery of the Framework will require new structures and new ways of working in partnership.

Section 3 Questions

Q1.	<p>Do you agree with taking a food systems, whole of government approach through a NI Food Strategy Framework?</p> <ul style="list-style-type: none">• Strongly agree• Agree• Neither agree/disagree• Disagree• Completely disagree
Q2.	<p>Please outline your views on taking a Food Systems “whole of government” approach through a Northern Ireland Food Strategy Framework?</p>

4. Strategic context

A Northern Ireland Food Strategy Framework provides an opportunity for a new approach to food within the context of a number of key strategic drivers. These include New Decade, New Approach (NDNA), Programme for Government, City and Regional Growth Deals, as well as a range of existing and new policies being developed across Government such as the Executive's Green Growth Strategy, Agricultural Policy Framework, Circular Economy Strategic Framework, 10X Economic Vision, 10X Skills Strategy and the revision of the obesity prevention framework, A Fitter Future For All.

New Decade, New Approach

The New Decade, New Approach Deal published in January 2020 outlined the priority for the NI Executive to develop a regionally-balanced economy with opportunities for all, ensuring that through investment for the future Northern Ireland can harness opportunities and drive sustainable productivity, including opportunities for future trade after EU Exit.

All political parties recognised the need for a coordinated and strategic approach to the challenge of Climate Change. DAERA on behalf of the NI Executive, are developing a Green Growth Strategy and associated Climate Action Plan which will be our initial route map to climate action, green jobs and a clean environment. As a dedicated programme within the Executive's Green Growth Strategy and Delivery Framework, the NI Food Strategy Framework aims to make a food system that is fair, healthy and environmentally friendly and one that helps to deliver sustainable economic growth.

Draft Programme for Government (PfG) Framework

The Northern Ireland Executive is currently developing a new strategic, Outcomes-based Programme for Government (PfG) - the draft is set out below. Its aim is to improve wellbeing for all citizens and its collective outcomes create a picture of the kind of society in which we all want to live.

New draft Outcomes Framework

The PfG Outcomes reflect the areas of economic and societal wellbeing that people say matter most to them. The Food Strategy Framework is projected to have input to 7 of the 9 draft Outcomes. In developing the Food Framework we have used this draft PfG as our starting point, given that it is forecast to be approved in 2021.

Figure 3: Draft PfG 2021.



Table 1 in Annex A provides a summary of the draft strategic priorities and linkages with existing strategies across NI Departments and Programme for Government outcomes.

Section 4 Questions

Q3.	What are your views on the strategic context identified?
Q4.	From your perspective, are there any other NI government policy linkages which you feel are relevant?

5. Northern Ireland Food Strategy Framework

Development work on the NI Food Strategy Framework has involved extensive stakeholder engagement which commenced prior to the COVID-19 pandemic. It began with the development of a draft Vision by officials from across all government departments. This Vision was tested using a Double Diamond Design Model (Discover, Define, and Develop) in a follow-up Strategic Insight Lab that took place over two days in December 2019. This process involved a wide range of key external stakeholders (including food and farming representative bodies, environmental NGOs, academic, health and education, and consumer interests, and local government). A key finding was that an enhanced collaborative approach is needed across Northern Ireland Departments to address the challenges and maximise the opportunities that a Food Strategy Framework could offer.

(a) Ambition, Scope, Vision and Aim

The Ambition, Scope, Vision, and Aim resulting from the work with NI Departments and external stakeholders are outlined below.

AMBITION:

For Northern Ireland to be a world-class food region, recognised for the quality, nutrition, safety and integrity of its food and its knowledge based approach. Central to this ambition are our use of sustainable production systems, the award winning quality of our products, the highest ethical and animal welfare standards, respect for the environment and everyone who works in the sector.

SCOPE:

A soil to society approach, encompassing the production, processing, marketing, and consumption of food and the consumer values and behaviours that influence these processes.

VISION:

A transformed food system that protects natural resources for future generations, is economically and environmentally sustainable and provides safe, nourishing, accessible food to people, who make informed healthy choices.

AIM:

The NI Food Strategy Framework aims to be a cross government unifying strategy, with a shared vision, principles and priorities to guide long term food decision making.

The scope of the Framework recognises that the ambition and vision cannot be achieved without a whole food supply chain approach. The leadership and implementation structures developed for the Food Strategy Framework will ensure strong alignment across linked policy areas such as agricultural, environment, and land use policies.

Section 5 (a) Questions

Q5.	What are your views on the proposed ambition of the NI Food Strategy Framework?
Q6.	What are your views on the proposed scope of the NI Food Strategy Framework?
Q7.	What are your views on the proposed vision of the NI Food Strategy Framework?
Q8.	What are your views on the proposed aim of the NI Food Strategy Framework?

(b) Strategic priorities

The proposed Framework highlights six strategic priorities to achieve the Vision. Five were identified from the work with NI Departments and key external stakeholders. A sixth was added to take account of experience of the COVID-19 pandemic. These six priorities will provide a focus and direction to NI Departments for future policy interventions on food. The six strategic priorities are:

	Priority One:	Building connections between health / wellbeing and food.
	Priority Two:	Building Sustainable Economic Prosperity.
	Priority Three:	Building a Food Culture and Food Conscious Society.
	Priority Four:	Protecting and Enhancing our Natural Resources.
	Priority Five:	Building Healthy Lives through Food Education.
	Priority Six:	Building and maintaining appropriate Emergency Contingency plans across the supply chain (added due to COVID-19).

Each of these cross-cutting strategic areas will be given prominence and policy coherence under the Framework through the establishment of a high level implementation group that will develop future policy interventions and oversee their implementation.



Strategic priority one - building connections between health / wellbeing and food

Why is this important?

The Northern Ireland Health Survey published in December 2020, reported that approximately 65% of adults were either overweight (38%) or obese (27%) and 26% of children aged 2-15 were either overweight (20%) or obese (6%)¹. The latest available figures estimate that the total direct and indirect costs of people being obese and overweight in Northern Ireland rose to £457m in 2015/16 - up from £268m in 2009/10², representing a significant financial cost to our health service and human cost for those whose health has been damaged.

Food Poverty has been a significant issue in Northern Ireland for many years, but the Covid-19 pandemic exacerbated the situation. Food bank usage across the Trussell Trust NI network rose from 45,134 emergency food parcels distributed in 2019-20 to 78,827 emergency food parcels in 2020/21³. This figure does not include emergency food aid provision from independent food banks, or those householders who are food insecure but do not access food banks, instead relying on other coping mechanisms, including family, friends and neighbours. UK data indicates that for every one food insecure person who uses a food bank, there are nine more who do not⁴, demonstrating that there remains a large number of people who are food insecure who are not accessing support from a food bank. It is estimated in the UK that food insecurity increased five-fold due to Covid-19 pandemic⁵. The Food Security in Northern Ireland report⁵ highlighted approximately one in six respondents as being food insecure and a recent report from Safefood and Food Standards Agency underlined that low-income families in Northern Ireland need to spend up to almost half (46%) of their weekly income to afford a healthy food basket that meets basic nutritional needs⁶. The Food Foundation⁷ have reported that Northern Ireland has the lowest average number of portions of fruit and vegetables consumed per constituent region of the UK, at just 2.1 relative to the recommended 5 a day messaging and the highest percentage of people (18%) eating less than 1 portion per day.

Strategic priority one will build on the connections between health, wellbeing and food, with a focus on making healthy, nutritious and sustainable food the 'food of choice', and ensuring food is produced to the highest quality, safety and ethical standards. It will enhance collaboration around policy agendas such as obesity, nutritional standards, food poverty, and the principles of One Health (which recognises that the health of humans, animals and ecosystems are interconnected).

What would success look like?

Northern Ireland will be a society where everyone has access to safe and nutritious food, where food insecurity and dietary related diseases are in decline, resulting in improved societal health and wellbeing.

Key partners:

Department of Health, Department of Communities, Department of Justice, DAERA, Food Standards Agency.



Strategic Priority Two: building sustainable economic prosperity

Why is this important?

The Food and Drink sector is a core part of the NI economy. In 2019 the agri-food sector⁸ had a gross turnover of approximately £5.4billion, employed 24,945 full time equivalent people and contributed 37% to total Northern Ireland manufacturing sales. 48% of our sales were destined to GB, 16% to Republic of Ireland, 8% to other EU countries, 6% to other countries and 23% locally within Northern Ireland. The Framework will encourage the sustainable growth of innovative, adaptable food businesses.

Strategic priority two will build on the connections between the economy, environment and food, with a focus on innovation, value-added, product differentiation, use of technology and data, the continued development of a skills and a professional knowledge base across the entire supply chain, and maximising market opportunities at home and elsewhere. It will enhance collaboration around policy agendas such as circular economy and economic development, innovation, skills and education, rural communities, and tourism.

What would success look like?

Northern Ireland will have a sustainable food system which is populated by successful, adaptable businesses with increased levels of productivity, circularity and innovation, which are competitive and able to maximise opportunities both in the NI marketplace and on the global stage. The NI agri-food sector is a major source of economic prosperity recognised for its quality, safety and knowledge driven approach, and for fairness and transparency in the supply chain.

Key Partners:

Department for Economy, DAERA, DoJ, Invest NI, Tourism NI, Food Standards Agency, Local Councils.



Strategic Priority Three - building a food culture and food conscious society

Why is this important?

Food culture incorporates our ethnicity, cultural heritage and provides a way of communicating within our families and communities and with others. In other parts of the world, a high quality food culture acts as a tremendous societal and economic stimulus. Northern Ireland Food and Drink produce is being recognised amongst the very best in the British Isles and further afield. In particular, businesses are obtaining notable success at the UK Great Taste Awards, the World Cheese Awards, the International Wine and Spirit Competition Awards and the Blas na hÉireann, Irish Food and Drink Awards. The hugely successful 2016 year of Food and Drink culminated with Belfast winning the coveted “World’s best food destination” at the 2018 International Travel and Tourism Awards.

Strategic priority three will build on the connections between the economy, environment, and food, with a focus on creating a healthy food culture, reconnecting people with knowledge of where their food comes from, building a food citizenship movement and promoting our quality produce. It will enhance collaboration around policy agendas such as economic prosperity, environment, rural communities, and tourism.

What would success look like?

Northern Ireland will have a culture of civic pride as the home of good food, where the social value of food is nurtured and celebrated. The food sector will be more resilient as a result of increased local, national and international demand encouraged by co-ordinated NI agri-food market awareness and promotion.

Key Partners:

Department for Economy, Department of Communities, DAERA, Tourism NI, Invest NI, Food Standards Agency, Local Councils.



Strategic Priority Four - protecting and enhancing our natural resources

Why is this important?

A sustainable food system involves the whole food supply chain and has environmental sustainability as one of its core elements. This priority area is directly linked to the long term vision for the Northern Ireland agricultural industry, which is increased productivity, environmental sustainability, improved resilience, and supply chain integration. Farmers/ growers, processors, retailers, food service sector and consumers all have an important role in protecting and enhancing our natural resources, while maximising circular economy and carbon reduction opportunities.

Waste - and food waste in particular - will continue to be a key area of focus. Globally, one third of all food produced is wasted⁹. The UN Sustainable Goal 12.3 sets a target by 2030 to reduce by 50% global per capita food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses. Northern Ireland meets its global obligations as part of the UK and will continue to seek to reduce food waste. The most recent report by the charity, Waste and Resources Action Programme (WRAP)¹⁰, estimated that the UK produced around 9.5 million tonnes of food waste in 2018, down from 10 million tonnes in 2015. While 70% of this came from households; manufacturing, hospitality and retail sectors also contributed significantly. WRAP estimated that the greenhouse gas (GHG) emissions associated with total UK food waste is around 25 million tonnes CO₂e. - It has said that of this waste, 6.4 million tonnes could have been eaten - the equivalent of over 15 billion meals, and at a time that coincides with the rise of food poverty.

There will also be a focus on food packaging. Statistics from Keep Northern Ireland Beautiful¹¹ showed that there were 1.3 million pieces of litter on our streets at any one time, equating to 28 tonnes of rubbish, resulting in an annual clean-up bill of £45 million. A total of 71% of all waste collected was made up of plastics, much of which can end up in landfill and pollution of waterways and oceans. These figures demonstrate the need to further reduce single use plastics and encourage the use of recycled materials in food packaging.

Strategic priority four will build on the connections between agricultural primary production, environment, and food, enhancing collaboration around policy agendas such as future agriculture support, environment, biodiversity and land use, reduction in food waste, carbon reduction and Green Growth. This priority has strong linkages with priority two.

What would success look like?

Northern Ireland will become a low carbon society where natural resources deployed in food production are responsibly managed and associated environmental costs/benefits are

appropriately valued and reflected across the food supply chain.

There will be a strong emphasis on circular economy, nature friendly farming practices, and opportunities to create profitable and shorter supply chains, minimise food waste, and redistribute surplus where possible.

Key partners:

Department for Economy, DAERA, Invest NI.



Strategic Priority Five - building healthy lives through food education

Why is this important?

What happens to children in their earliest years is key to outcomes in adult life. A healthy balanced diet is critical to children's growth and development, to their educational performance and attainment and to their long term health and wellbeing. The relationship between poor health, nutrition and low school achievement is well documented¹². Experience in the earliest years and at school has a crucial role in influencing children and young people about the importance of a balanced diet, how to make healthy food choices and the impacts of poor diet on health.

Strategic priority five will build on the connections between health, education, farming, environment, and food. It will enhance collaboration around policy agendas such as food in schools, obesity, healthy eating, and nutritional standards.

What will success look like?

School food education will create a strong foundation for a healthy lifelong relationship with food, encouraging and supporting children to eat well, understand where and how their food is produced and processed, and how food choices impact on their health and the environment. In addition, this priority focuses on education throughout life to also improve adult education in healthy foods and nutrition. There are particular links to strategic priorities one and three.

Key features will include developing and supporting education interventions to improve the understanding of healthy foods and nutrition, how food is produced and the skills of growing fruit and vegetables, rearing animals for food, cooking, and minimising food waste.

Key Partners:

Department of Education, Department of Health, Education Authority, DAERA, Food Standards Agency.



Strategic Priority Six - building and maintaining appropriate emergency contingency plans across the supply chain.

Why is this important?

Strategic priority six will build on the connections between food supply security, food poverty, safety and integrity of food and protection of the food system economy. The food supply chain is global, dynamic, and complex. New and challenging risks are emerging, including climate change, threat of cyber-attacks, product contamination, and unexpected shutdowns of key supply chain infrastructure.

During the Covid-19 pandemic, Northern Ireland put in place emergency plans to ensure the continuity of food supply to supermarket shelves here and the accessibility of food to vulnerable families and individuals. This priority will build on the existing Food Supply Security work, led by DAERA during the Covid-19 pandemic, which involved a coordinated cross-sectoral approach to address existing or emerging risks along the entire food chain.

What will success look like?

The Northern Ireland food system (industry, Government, voluntary and community sectors) will proactively manage risk along the entire food chain. It will include accessibility to food by people who live here, the safety and integrity of food, and protection of the food system economy.

This priority will aim to ensure that emergency contingency plans will be ready to operate in any future crisis to ensure a continued supply of safe food for all the people of Northern Ireland. There is a significant role for industry to maintain robust contingency plans to deal with disruptions to food supplies. Government has a role in co-ordinating the response to crises affecting food systems. It will encourage partnerships with industry and the voluntary and community sector to mitigate risks to consumers. The lessons learnt from previous pandemics/ disease outbreaks will inform the plans for dealing with future emergencies.

Key partners:

Department of Communities, Department of Health, Food Standards Agency, DAERA, Department of Economy, Invest NI.

Section 5 (b) Questions

Q9.	<p>Do you agree with the proposed six strategic priorities?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree/disagree • Disagree • Completely disagree
Q10.	<p>Are there any amendments or refinements that you would like to make to these priorities?</p>
Q11.	<p>From your perspective, are there any strategic priorities that are missing from the NI Food Strategy Framework? If 'yes', what are they and why?</p>

Decision Making Principles

Eight guiding principles will guide the development of plans and future policy interventions by the implementation groups that will be responsible for each of the six strategic priorities (see Table 2):

Table 2: Decision Making Principles

Principle One	Inclusivity and Openness - all voices of society are part of the ongoing dialogue on food issues.
Principle Two	Collaboration and Leadership - improved integration, shared responsibility in food related policies and programmes.
Principle Three	Evidence and Accountability - food related policies and programmes are evidence based, transparent, accountable and results orientated.
Principle Four	Right to Food - Everyone in society has the right to adequate, available and accessible, safe and nutritious food.
Principle Five	Sustainability - a food system where decision making supports social, environmental and economic sustainability.
Principle Six	Adaptability - a food system that is people focused, knowledge and science driven, resilient and adaptive to new innovations as priorities emerge.
Principle Seven	Long Term Focus - a sustained, long term strategic approach, which is flexible and measurable through short, medium and long term milestones.
Principle Eight	Single Supply Chain - food related policies and programmes are designed with due regard to the needs and development of a fair and equitable single supply chain.

Section 5 (c) Questions

Q12.	What are your views on the proposed guiding principles to be used to guide the development of future policy interventions?
Q13.	From your perspective, are there any guiding principles missing? If yes, what are they and why?
Q14.	<p>Do you agree with the high level vision, principles and strategic areas contained in the proposed NI Food Strategy Framework?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree/disagree • Disagree • Completely disagree
Q15.	Have you any other comments on the proposed NI Food Strategy Framework?

6. Implementation Approach

Delivery of the framework will require significant leadership, a shared understanding of needs, the combining of resources, and effective governance arrangements. It is recognised that no single Department has all the policy tools required. Partnership working across central and local government, the private sector, and the community and voluntary sector is fundamental to fostering sustainability and ensuring the best possible outcomes for people. Key enablers will include the use of education, knowledge, skills, science and innovation.

The Food Strategy Framework sets a long term strategic direction. NI Departments will work with other organisations to design and implement five year programmes of work under each of the priority areas identified in the Framework. A formal review of the first phase of the Food Strategy Framework will take place in 2030.

Governance Structures

The Food Strategy Framework will sit within the governance arrangements of the Executive's Green Growth Strategy, which is led by an Inter-Ministerial Group (IMG), chaired by the DAERA Minister, supported by a Senior Officials Group representing all Departments. A new Food Programme Board will report to the Senior Officials Group. These structures will provide a mechanism for the identification and prioritisation of resources. (See Figure 4)

The Food Programme Board will align food responsibilities across government and facilitate engagement and partnership with stakeholders, including the food Industry, voluntary and community sector, and consumers.

To design plans that cut across departments and sectors to deliver better outcomes around food, the Board will have to work outside traditional boundaries. Collaboration and teamwork with a wide range of key stakeholders and partners from across industry, community and voluntary sectors will be key to the implementation and delivery of the Framework.

The Board will consider how best to engage with stakeholders, while avoiding nugatory duplication. It will examine whether the existing arrangements for stakeholder engagement could be adapted to optimise working on food. It will also consider whether it would be useful to establish new stakeholder Food Forums.

Each of the six strategic priority areas will be led by an implementation group chaired by the appropriate NI Department(s). These groups will develop five year action plans and will oversee the implementation of these plans. The groups will set up topic-specific working groups as appropriate. It is acknowledged that a number of these relevant topic specific working groups may already exist; such groups will not need to be dismantled and recreated. It is very much the intention that issues will be addressed by the combined efforts of many, rather than the individual efforts of a few.

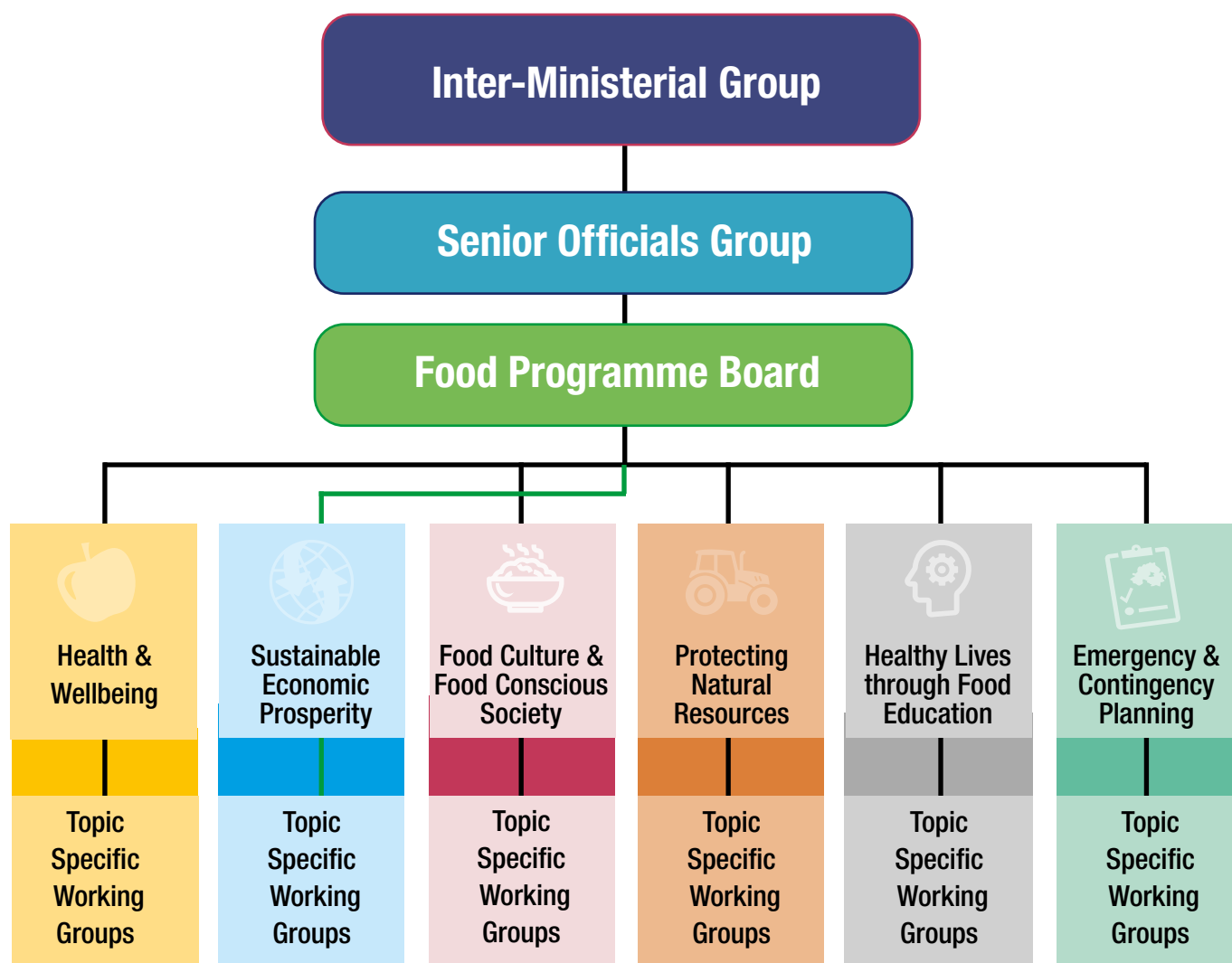


Figure 4: Proposed Food Programme Board.

To encourage collaborative working across organisational boundaries and demonstrate early progress, the Framework will identify a number of early Foundation Projects which, subject to resource and Ministerial agreement where appropriate, will be progressed over the short to medium term.

For example, in one early Project, a cross departmental task force will investigate the opportunity to increase the amount of food sourced locally by government. It is recognised that it has been difficult for smaller, local producers and suppliers to access the public sector food supply chain. The Project will focus on supply to NI schools, hospitals and prisons and seek to learn from the experiences of other regions, who are piloting novel dynamic procurement systems. This Project will seek to promote health, environmental, socio-economic objectives and will contribute to food supply resilience.





Another potential early Project will explore how to encourage children in schools to eat more fruit and vegetables, including seasonal local produce. This Project will seek to promote health, socio-economic, environmental and education objectives. It will aim to help to connect children with where their food comes from and encourage them to make healthy eating choices.

Section 6 Questions

Q16.	What are your views on the proposed approach to implementation, i.e. five year action plans will be developed and implemented in collaboration with key stakeholders and partners?
Q17.	What are your views on the establishment of a Food Programme Board that is embedded within the governance arrangements for Green Growth?
Q18.	Do you have any comments on future arrangements for engagement with stakeholders about implementation and delivery of the NI Food Strategy Framework?
Q19.	Have you any other comments on how to achieve a diverse and inclusive process for public engagement?

7. Benefits to be realised

A Food Systems approach provides an opportunity to work together to achieve health, environmental and economic goals in synergy. As it is a new approach for Northern Ireland, evidence of the benefits that the Food Strategy Framework delivers will be gathered throughout its implementation. There is the potential to achieve the following benefits:

-  Improved collective responsibility, leadership & collaboration - “shared solutions to shared issues”. Achieved through:
 - Partnership working with industry, community and voluntary sectors and the general public
 - Actively seeking synergies for better delivery of public policy
 - Working with existing community planning structures and processes
 - Development of evidence base with academic institutions
-  Agreed focus on priorities.
-  Better value for money for the public purse.
-  Maximise opportunities from new technologies, data and innovation.

- ✓ Coordinated repositioning of food messaging to enhance reputation.
- ✓ Greater economic, social and environmental sustainability.
- ✓ Food becomes an even bigger part of Northern Ireland's international presence.
- ✓ Food becomes a platform for educational and economic improvement.
- ✓ Contribution to NI PfG and UK commitment to the UN Sustainable Development Goals. (Figure 5)

Figure 5: UN Sustainable Development Goals



Delivery of the key objectives detailed within the five year action plans for each strategic priority will also provide evidence of progress.

A Northern Ireland Food Strategy Framework Report will be produced at the mid-point of implementation, i.e. at the end of the first five year action plan. A formal review of the framework will take place no later than 2030.

This retrospective evaluation of the first phase of the Framework will inform the development of its successor.

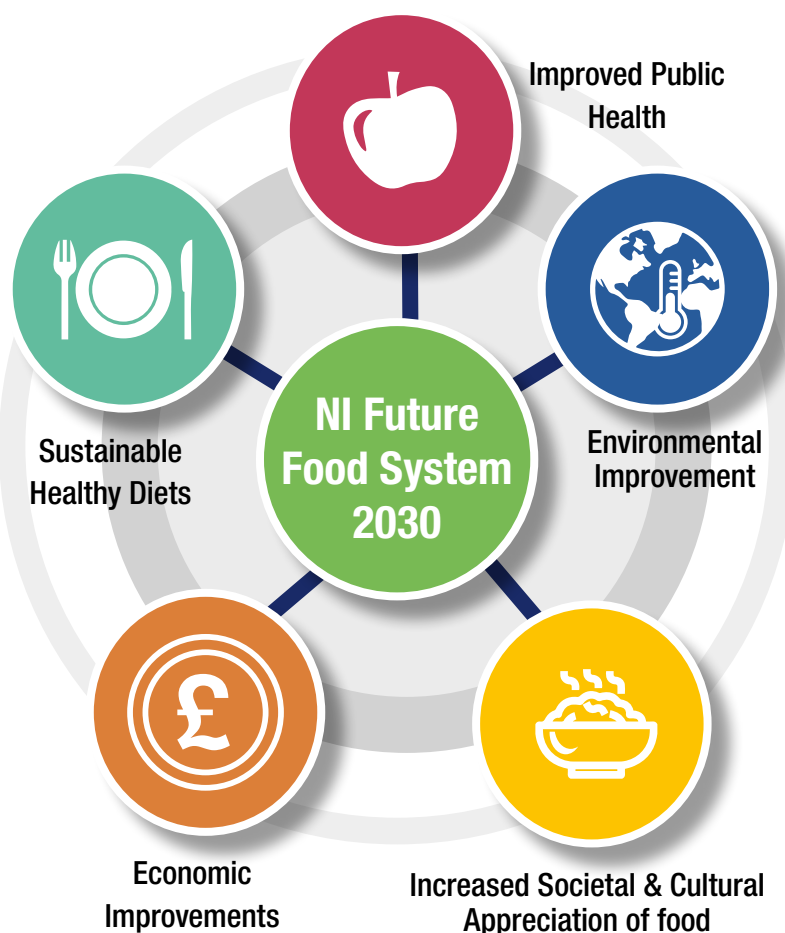


Figure 6: Future benefits

Section 7 Questions

Q20.

Do you agree with the potential benefits to be derived from taking a Food Strategy Framework approach?

8. Rural needs considerations

All government departments have a statutory duty to screen decisions to consider the likely impacts of proposed decisions on rural areas.

A high level rural needs assessment has been completed and is available [here](#).

While potential impacts of the strategy on rural areas have been identified, the rural needs assessment template is a living document and therefore any additional views you may have on how the food strategy framework could impact rural areas are welcome.

Section 8 Questions

Q21.

Are there any rural needs comments that you wish to raise at this point about the impact of the NI Food Strategy Framework on Rural areas? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.

9. Equality considerations

Section 75 of the NI Act 1998 (the Act) requires public authorities, in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations across a range of categories outlined in the Act. DAERA commits to having effective internal arrangements in place for ensuring our effective compliance with the Section 75 statutory duties and for monitoring and reviewing our progress.

In the context of Section 75, 'policy' is very broadly defined and it covers all the ways in which we carry out or propose to carry out our functions. In making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy.

Departments use the tools of screening and equality impact assessment to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. Screening is completed at the earliest opportunity in the policy development/review process. Policies which we propose to adopt will be subject to screening prior to implementation. For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages during implementation.

An Equality and Human Rights Screening exercise has been completed for this Food Strategy Framework; the Framework has been screened out of a full equality impact assessment. Once this Framework is finalised and published then all policies that will cascade from this framework will be equality screened and where necessary a full Equality Impact Assessment will be completed by the relevant Department. We welcome any information you may have about relevant equality aspects in consideration of this NI Food Strategy Framework during this consultation. Consideration will also be given to appropriate strategic environmental assessment.

Section 9 Questions

Q22.	Are there any equality comments that you wish to raise at this point? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.
Q23.	Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.
Q24.	Are there any other comments you wish to make or any other evidence of need that you think Departments would find helpful? Please submit any evidence with your response.

10. Consultation and next steps

DAERA welcomes responses and comments from stakeholders on the questions outlined in this document to help develop proposals for a NI Food Strategy Framework.

How to respond

A full list of questions in this document can be found at Section 11.

When responding please provide the following information:

Your name;

Contact details (preferably e-mail); and

Organisation you represent (if applicable).

This consultation exercise uses the Citizen Space Hub, accessible at: <https://consultations.nidirect.gov.uk/daera-food-and-farming-policy/food-at-the-heart-of-our-society-a-prospectus-for-change> as the primary means of response, in order to make it as accessible as possible.

Email responses should be sent to: futurefoodpolicy@daera-ni.gov.uk

If you are unable to email and would prefer to post your response, please call 028 90524150, in order to make the necessary arrangements.

The closing date for responses is 19th November 2021. Please ensure your response is submitted by that date.

Publication of responses

DAERA is leading the consultation on behalf of NI Departments, and will share the responses with the other relevant Departments. At the end of the engagement, DAERA intends to publish a summary of responses following the closing date for receipt of views. Your response, and all other responses to this publication, may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Any confidentiality disclaimer generated by your IT system in e-mail responses will not be treated as such a request.

Section 8(e) of the Data Protection Act 2018 permits processing of personal data when necessary for an activity that supports or promotes democratic engagement. Information provided by respondents to this stakeholder engagement exercise will be held and used for the purposes of the administration of this current exercise and subsequently disposed of in accordance with the provisions of the Data Protection Act 2018 and General Data Protection Regulation.

The Freedom of Information Act gives the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a stakeholder engagement exercise. The Department cannot automatically consider as confidential information supplied to it in response to a stakeholder engagement exercise. However, it does have the responsibility to decide whether any information provided by you in response to this stakeholder engagement exercise, including information about your identity, should be made public or be treated as confidential. If you do not wish information about your identity to be made public, please include an explanation in your response.

This means that information provided by you in response to the stakeholder engagement is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- The Department should not agree to hold information received from third parties "in confidence" which is not confidential in nature; and
- Acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses please contact the Information Commissioner's Office. (<https://ico.org.uk/>).

11. Capturing stakeholder views

QUESTION 1.	Do you agree with taking a food systems, whole of government approach through a NI Food Strategy Framework? <ul style="list-style-type: none"> • Completely agree • Agree • Neither agree/disagree • Disagree • Completely disagree
QUESTION 2.	What are your views on taking a Food Systems “whole of government” approach through a NI Food Strategy Framework?
QUESTION 3.	What are your views on the strategic context identified?
QUESTION 4.	From your perspective, are there any other NI government policy linkages which you feel are relevant?
QUESTION 5.	What are your views on the proposed ambition of the NI Food Strategy Framework?
QUESTION 6.	What are your views on the proposed scope of the NI Food Strategy Framework?
QUESTION 7.	What are your views on the proposed vision of the NI Food Strategy Framework?
QUESTION 8.	What are your views on the proposed aim of the NI Food Strategy Framework?
QUESTION 9.	Do you agree with the proposed six strategic priorities? <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree/disagree • Disagree • Completely disagree
QUESTION 10.	Are there any amendments or refinements that you would like to make to these priorities?
QUESTION 11.	From your perspective, are there any strategic priorities that are missing from the NI Food Strategy Framework? If ‘yes’, what are they and why?
QUESTION 12.	What are your views on the proposed guiding principles to be used to guide the development of future policy interventions?
QUESTION 13.	From your perspective, are there any guiding principles missing? If yes, what are they and why?

QUESTION 14.	Do you agree with the high level vision, principles and strategic areas contained in the proposed NI Food Strategy Framework? <ul style="list-style-type: none"> • Completely agree • Agree • Neither agree/disagree • Disagree • Completely disagree
QUESTION 15.	Have you any other comments on the proposed NI Food Strategy Framework?
QUESTION 16.	What are your views on the proposed approach to implementation, i.e. five year action plans will be developed and implemented in collaboration with key stakeholders and partners?
QUESTION 17.	What are your views on the establishment of a Food Programme Board that is embedded within the governance arrangements for Green Growth?
QUESTION 18.	Do you have any comments on future arrangements for engagement with stakeholders about implementation and delivery of the NI Food Strategy Framework?
QUESTION 19.	Have you any other comments on how to achieve a diverse and inclusive process for public engagement?
QUESTION 20.	Do you agree with the potential benefits to be derived from taking a Food Strategy Framework approach?
QUESTION 21.	Are there any rural needs comments that you wish to raise at this point about the impact of the NI Food Strategy Framework on Rural areas? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.
QUESTION 22.	Are there any equality comments that you wish to raise at this point? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.
QUESTION 23.	Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.
QUESTION 24.	Are there any other comments you wish to make or any other evidence of need that you think Departments would find helpful? Please submit any evidence with your response.

Table 1: The draft strategic priorities and linkages with existing strategies across other Departments and Programme for Government outcomes.

Strategic Priorities	Examples of links to existing Strategies / Policies.	PfG Linkages (Draft 2021)
Priority One: Building connections between health /wellbeing and food.	<p>DoH: Making Life Better, A Fitter Future for All.</p> <p>DfC: Anti-Poverty (under development and potential for Food Poverty).</p> <p>DAERA: Rural Framework.</p> <p>DoF: Public Procurement Policy.</p> <p>NIPS: Improving Health Within Criminal Justice</p>	<p>We have an equal and inclusive society where everyone is valued and treated with respect.</p> <p>Our children and young people have the best start in life.</p> <p>We all enjoy long, healthy active lives.</p>
Priority Two: Building Sustainable Economic Prosperity.	<p>DfE: Economic Strategy, Skills Strategy, Innovation Strategy, Tourism Strategy,</p> <p>10X Economy: An Economic Vision for a decade of innovation and 10X Skills Strategy,</p> <p>FE/ HE Strategies,</p> <p>Circular Economy Strategic Framework (CESF) (under development).</p> <p>DAERA: Rural Framework,</p> <p>Knowledge Framework,</p> <p>Green Growth Strategy (under development).</p> <p>DoF/DoJ: Public Procurement Policy.</p> <p>DoJ: Modern Slavery and Human Trafficking Strategy</p>	<p>Our economy is globally competitive, regionally balanced and carbon-neutral.</p> <p>We live and work sustainably – protecting the environment.</p> <p>Everyone can reach their potential.</p> <p>People want to live, work and visit here.</p>

Priority Three: Building a Food Culture and Food Conscious Society.	DfE: Tourism Strategy, Economic Strategy. DAERA: Environment Strategy, Rural Framework.	<p>We have an equal and inclusive society where everyone is valued and treated with respect.</p> <p>People want to live, work and visit here.</p>
Priority Four: Protecting and Enhancing our Natural Resources.	DAERA: Agricultural Policy Framework, Environment Strategy, Knowledge Framework, Green Growth Strategy (under development), Waste Prevention Programme 2019: Stopping Waste in its Tracks. DoF: Public Procurement Policy. DfE: Circular Economy Strategic Framework (CESF) (under development).	<p>We live and work sustainably – protecting the environment.</p> <p>Our economy is globally competitive, regionally balanced and carbon-neutral</p>
Priority Five: Building Healthy Lives through Food Education.	DE& DoH: Food in Schools Policy. DAERA: Knowledge Framework, Environment Strategy. DoH: Fitter Future for All, Obesity Strategy. DoF: Public Procurement Policy.	<p>Our children and young people have the best start in life.</p>

Priority Six: Building and maintaining appropriate Emergency Contingency plans across the supply chain. (Added due to COVID-19).	DoF: Public Procurement Policy.	
---	--	--

References

1. <https://www.food.gov.uk/sites/default/files/media/document/fy2-wave-1-ni-food-security-short-report-doi.pdf>
2. Figures obtained from Department of Health Policy branch
3. Trussell Trust (2021) End of year stats. Available from: <https://www.trusselltrust.org/news-and-blog/latest-stats/end-year-stats/>
4. Bramley, G., Treanor, M., Sosenko, F. and Littlewood, M. (2021) State of hunger: Building the evidence on poverty, destitution, and food insecurity in the UK. Year two main report. Available from: <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/05/State-of-Hunger-2021-Report-Final.pdf> p.58
5. Kolta, J., Toffolutti, V., McKee, M. and Stuckler, D. (2021) Prevalence and changes in food-related hardships by socioeconomic and demographic groups during the COVID-19 pandemic in the UK A longitudinal panel study. Lancet. Available from: [https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762\(21\)00102-2/fulltext](https://www.thelancet.com/journals/lanepi/article/PIIS2666-7762(21)00102-2/fulltext) DOI: <https://doi.org/10.1016/j.lanepi.2021.100125>
6. <https://www.food.gov.uk/sites/default/files/media/document/fy2-wave-1-ni-food-security-short-report-doi.pdf> [Microsoft Word - Safefood - Cost of a healthy food basket - Report - NI.docx](#)
7. Peas-Please-Veg-Facts-2021.pdf (foodfoundation.org.uk)
8. Size and Performance (daera-ni.gov.uk) 21.22.061 DAERA Size and Performance Food and Drinks Processing Sector infographic (daera-ni.gov.uk)
9. <http://www.fao.org/food-loss-and-food-waste/flw-data>
10. <https://wrap.org.uk/content/courtauld-commitment-2025-milestone-progress-report>
11. <blog-000968-20200228111517.pdf> (keepnorthernirelandbeautiful.org)
12. WBLResRep18.pdf (ucl.ac.uk)

Alternative Formats

This document is also available on the DAERA website at:

<http://www.daera-ni.gov.uk/consultations>

You can request a copy of this document in other formats, such as:

- Paper Copy
- Large Print
- Braille
- Other languages

To get a copy of this document in another format contact:

Future Food Policy Branch

Email: futurefoodpolicy@daera-ni.gov.uk

Tel: 028 9052 4150 (A member of the team will call you back)



This page is intentionally left blank

Belfast City Council DRAFT response to the DAERA proposed Northern Ireland Food Strategy Framework.

Q1 –

Strongly agree.

Q2 –

We believe this is a prudent step and sensible approach which will help achieve a more sustainable pattern of production, consumption and waste in line with the Circular Economy. We note that production systems are a major issue for agriculture, in terms of how our food is grown and produced, as well as the associated environmental impacts.

Many components of the food system are interdependent, and a co-ordinated approach will help to align food policies and wider considerations.

It should also help to address some of NI's ongoing political and economic uncertainty in the context of EU Exit. However, it will be important that the strategy consider and address the prevailing public consumerist culture, as well as unsustainable business ideals of continual or unlimited economic growth.

Q3 –

This seems to be an appropriate and sensible approach.

Q4 –

We note that the Circular Economy Strategic Framework and the Agricultural Policy Framework are already included. However, there is no reference to the new NI Biodiversity Strategy which is essential given the ecosystems services food production is reliant upon. The Food Strategy should also link with the Environment, ammonia, marine, peatland strategies etc. In addition, there must be linkages to existing legislation such as the Habitats Directive and Water Framework Directive and any future climate or nature based legislation.

We would also highlight the need for developing and delivering localised plans, (such as regional Waste Plans, Local Development Plans and the Belfast Region City Deal) in line with this strategic framework. We therefore suggest that consideration is given to how best the NI Food Strategy Framework could permeate through to such plans.

Q5 –

We believe that it would be beneficial to aim for NI becoming (more) self-sufficient in terms of food supply; this would help ensure food security, move us towards a local circular economy and mitigate climate change (by reducing transport). We would also suggest adopting a zero-waste approach within the ambition statement.

We recommend that the document should outline clear definitions (perhaps in the glossary) and provide examples of “world class” and “award winning quality”

In addition, the ambition states “respect for the environment” but we believe this is not sufficient given the reliance of food systems on the natural environment. We

believe this should be strengthened to include protection and restoration of natural resources and ecosystem services.

Q6 –

The scope of the strategy should not end at society but rather adopt a full life cycle “soil-to-soil” approach. It should also incorporate application of the Food Hierarchy (Minimise, Redistribute/Share - human, then animal and Recycle/Compost) in it’s drive towards zero waste.

The strategy would appear to be very inward focused and only seems to address locally produced food; should it not also address imported food and the impacts associated with this?

Q7 –

We welcome the emphasis on a food system that protects natural resources for future generations and is economically and environmentally sustainable.

It would also be worthwhile adding “**enhances / promotes and**” wording before “*protects natural resources for future generations...*” So: “A transformed food system **that enhances, promotes and protects natural resources** for future generations, is economically and environmentally sustainable and provides safe, nourishing, accessible food to people, who make informed healthy choices.

It would be beneficial to aim for NI becoming more self-sufficient in terms of food supply; this would help ensure food security, move us towards a local circular economy and mitigate climate change (by e.g. reducing transport).

Could it be considered to reword the vision slightly from “...*and provides safe, nourishing, accessible food to people, who make informed healthy choices*” as this could be interpreted as only being targeted to those people making healthy choices when it should be aimed at everyone?

Q8 –

If the NI Food Strategy Framework aims to be a cross government unifying strategy, it should be mindful of the work currently being undertaken by DAERA to develop a Waste Collections Consistency Framework. Food waste is being addressed within the development of this statutory Framework and the NI Food Strategy should be consistent with the approach adopted by DAERA.

Also, consideration should be given to The Food Waste Regulations (NI) which stipulate that households must have a food waste collection scheme. (Indeed, in our research, through pilots conducted within Belfast, the weekly, separate food waste collections have performed better than the fortnightly mixed organic waste collections).

The Food waste Regulations (NI) also require businesses producing food waste to separately store this waste so that it can be recycled/composted. To date there has been little enforcement (if any) of these regulations. It would be beneficial to fully apply existing legislation before introducing further legislation which again may not be enforced.

Q9 –
Agree

Q10 –

The section in relation to Strategic Priority 5 states that it is strongly linked to Strategic Priorities 1 and 3. Strategic Priorities 1 and 5 seem so strongly linked that they could potentially be merged. Strategic Priorities 2 and 6 could both include the aim of becoming more self-sufficient as discussed earlier.

A clear definition of what is meant by “food conscious society” (Strategic Priority 3) could be included within the document glossary.

We welcome the inclusion of Strategic Priority 4 protecting and enhancing our natural resources however, we are disappointed there is no reference to ecosystem services upon which food systems are completely dependent. There is only a cursory reference to an emphasis on nature friendly farming practices. Details on natural resource protection should include emphasis and details on ecosystem services. Key examples include soil formation, pollination, nutrient cycling, water regulation and purification.

Similarly, the lack of emphasis on ecosystem services is apparent in Strategic priority 6 where there is no mention of soils, pollinators, pests, diseases, or invasive alien species. As over one third of bee species on the island of Ireland are at risk of extinction, this is a key risk. A focus on ecosystem services is essential to ensure food security and a thriving, sustainable Northern Ireland food system.

Q11 –

Consideration could be given to the following topics and examples for inclusion within the strategic priorities:

- Self-sufficiency and grow-your-own (both at home and at community level, such as community gardens and initiatives).
- Food wasted through the production cycle and waste reduction initiatives such as “Wonky Veg” ranges (that are perfectly good to eat but perhaps not typical in appearance), At the very least, to direct this material to food banks/food distributions systems to alleviate food poverty.
- An emphasis on affordable fresh food and vegetables available to everyone.
- Agriculture production systems which are based on provision of public goods, ecosystem services rather than food productivity.
- Impacts of agriculture - Agriculture is currently the largest source of greenhouse gas emissions across NI (27%) in 2018. It is also the sector with the largest proportion of substantiated water pollution incidents in 2019 (36.5% of the 1,754 substantiated incidents) *
- Emphasis on organic farming.
- Agriculture – promote use of non-peat based compost systems e.g. NWP compost made from organic waste. (“Close the loop”).
- Consideration to (even a marginal) reduction in meat consumption (and the added benefits to health and the environment that this could bring). But doing so in a fair and just manner.
- School food education – The main focus currently would appear to be on dietary and healthy requirements, but it should also cover using up leftovers

(use by dates), redistribution channels and finally recycling/composting as opposed to landfill

- Transparency with regards to food contents and production methods
- Reporting mechanisms for all participants of the food supply chain

Q12 –

The guiding principles seem to be comprehensive and appropriate, but we would request clearer definition of what is meant by a single supply chain or why it would be desirable (guiding principle 8).

Q13 –

Again, we would emphasise the importance of a life-cycle approach and to promote a “soil-to-soil” principle, (going beyond the farm-to-fork concept), incorporating a closed loop food system approach.

Q14 –

Agree.

Q15 –

We would reiterate the point that it would be good to aim for NI to become more self-sufficient in terms of food supply. The framework should be informed by advice and information on food and the circular economy from organisations such as WRAP, The Ellen MacArthur Foundation and Circle Economy.

Q16 –

The proposed approach to implementation seems reasonable, providing that there are regular reviews within the five year period, considering local and global conditions and emerging legislation, as well as stakeholder consultations on the proposed actions. The strategy should be robust and resilient. It should also be designed and implemented in such a way to withstand any political instability such as changes within government, including the NI assembly.

Q17 –

We note that the Green Growth Strategy is not finalised and has an emphasis on increased production.

It may be of concern that this Food Strategy could potentially be weakened if the Food Programme Board were to sit within the governance arrangements of the Green Growth Strategy.

We would reiterate our point made, to Q16, around stability and we would emphasise that political resilience should be incorporated into the governance arrangements.

Q18 –

Any future arrangements for engagement with stakeholders should include regular reviews of appropriateness of the visions, goals and plans etc.

Q19 –

As many engagement platforms as reasonably possible should be considered, to take into account the range of sectors, communities and individuals affected by the proposals.

Q20 –

Yes. The strategy should also consider including an explanation of which UN Sustainable Development Goals (in Figure 5) that it contributes to (perhaps all of them) and an outline of how it contributes to each of these. In addition, there should be reference to potential to deliver ecosystem services, public goods to society.

Q21 –

Not at this point

Q22 –

Not at this point

Q23 –

As outlined under Q10 and Q11 the impacts of the Agricultural sector need to be addressed with specific reference to water pollution, air pollution (ammonia), biodiversity loss and greenhouse gas emissions in particular.

The omission of ecosystem services is of key concern given the fundamental reliance of the sector on the natural environment. Coupled with pollution, unsustainable production practices jeopardise the entire sector and Northern Ireland's food security. Restoration of ecosystem services is required as an underlying principle for the strategy.

Q24 –

Not at this point

* NI Environmental Statistics Report 2021 <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2021.pdf>

This page is intentionally left blank

Consultation for the Reduction of Single-Use Plastic Beverage Cups and Food Containers



***Sustainability** at the heart of a living, working, active landscape valued by everyone.*



Department of
**Agriculture, Environment
and Rural Affairs**

www.daera-ni.gov.uk



**INVESTORS
IN PEOPLE**

Contents

Ministers Foreword	3
1. Introduction and background	5
1.1. Purpose of the consultation	5
1.2. Strategic context	5
1.3. Drivers and evidence for change	6
1.4. Scope	7
1.5. Policy options	8
1.6. How would a proposed levy be used?	8
2. Methodology	9
2.1. Impact Assessment methodology	9
2.2. General questions on approach	11
2.3. Materials in scope	11
2.3.1. SUP beverage cups	11
2.3.2. SUP food containers	12
2.3.3. Materials in scope questions	13
3. Results	14
3.1. SUP Beverage cups	14
3.1.1 Ban	18
3.1.2 Levy	19
3.1.3 Voluntary retailer-led scheme	20
3.2 SUP food containers	21
3.2.1 Ban	26
3.2.2 Levy	27
3.2.3 Voluntary retailer-led scheme	29
3.3 Preferred approach	30
3.4 Administration and enforcement	31
4 Summary and conclusion	33
5 How to respond to this consultation	33
5.1 After the consultation	33

Minister's Foreword

It was a little over 10 years ago as then Minister for the Environment that I announced that my Department would introduce a levy on carrier bags. I had hoped that a voluntary approach by industry would achieve the reduction we wished to see but sadly that did not prove to be the case. I remember only too well back then that you couldn't go very far at all without seeing discarded plastic bags hanging from trees, in hedgerows or lying on grass verges. They were a real scourge in our towns and on our beautiful Northern Ireland countryside. I am pleased to note that because of the carrier bag levy that I proposed this sight is far less common now following a huge reduction in "throw away" carrier bags.



However, even though many littered bags have disappeared the plastic hasn't. Because we rely so much on single-use plastic, every year in Northern Ireland we use over 70 million single-use plastic cups and around 150 million single-use plastic takeaway food containers that are simply discarded. What a waste!

Sadly, drinks cups and takeaway food containers made with single-use plastics are a new litter scourge. Recent surveys on behalf of my Department estimate that around 1 million single-use cups and food containers end up as unsightly litter around our countryside annually. Unfortunately the blight doesn't stop at the unsightly nature of this litter. It ends up in our waterways and ultimately in our seas with a further $\frac{3}{4}$ million of these items estimated to make their way into the sea each year. It may be out of sight but it doesn't go away. Plastic from decades ago remains in our environment today and over the years we have continued to add to that mounting reservoir of littered plastic.

The NI Executive recognised this problem in the New Decade, New Approach agreement and gave me as Agriculture, Environment and Rural affairs Minister the task of creating a plan to do something about it. I am already addressing the collection and recycling of used plastics through co-operating with my UK colleagues on proposed reform to Extended Producer Responsibility and the creation of a Deposit Return Scheme. In June 2021 I also launched a Call for Evidence to help inform the development of a plan to eliminate plastic pollution in Northern Ireland.

I believe we need to promote alternatives to single-use plastics which is why I am introducing this consultation to look specifically at reducing plastic pollution from takeaway litter. In the consultation my department has suggested three options for plastic items: an outright ban; a levy along the lines of the Carrier Bag Levy; and a voluntary reduction approach. These options would result in a range of outcomes in terms of impact and how quickly a reduction in plastic can be achieved. If you share with me my concern for reducing plastic pollution I encourage you to respond to this consultation. We would like your feedback on the optimum solution.



Edwin Poots MLA

Minister of Agriculture, Environment and Rural Affairs



1. Introduction and background

1.1. Purpose of the consultation

This consultation presents options on the reduction of the consumption of single-use plastic (SUP) beverage cups and food containers in Northern Ireland (NI), with the aim of effecting a substantial reduction in the number of SUP beverage cups and food containers in circulation. The Department aims to encourage a more sustainable environment and circular economy for everyone across NI and the reduction in usage of all SUP beverage cups and food containers is a central building block of these targets.

The Department is seeking stakeholders' views on the suggested policy options to ensure the most effective method of reducing the consumption of SUP beverage cups and food containers is found. The results of this consultation will be used to determine the best policy options which may help to frame possible measures to promote the reduction in SUP items.

The goal of the policies is to reduce the use of the targeted types of SUP packaging, by encouraging wider take up of multi-use (MU) and/or single-use non-plastic (SUNP) alternatives.

1.2. Strategic context

Northern Ireland's environment is our most important asset and it is crucial to members of the public that we continue to protect and enhance it. The NI Executive's Programme for Government, Outcome 2 - we live and work sustainably, protecting the environment, aims to put a healthy environment at the heart of future Government policies whilst maintaining sustainable economic growth. In the *'New Decade, New approach'* document the NI Executive gave a commitment to prepare a plan to eliminate plastic pollution. These proposals are an important element in delivering on this commitment, as any changes to encourage the reduction of SUP beverage cups and food containers will deliver a decrease in the use of some of the most harmful plastics.

DAERA joined the UK Plastics Pact in July 2020¹. The Pact is a trailblazing, collaborative initiative, delivered by WRAP (the Waste and Resources Action Programme) in partnership with the Ellen MacArthur Foundation. The initiative is unique because it unites governments, local authorities, non-government organisations (NGOs) and businesses involved in producing, selling, collecting and reprocessing plastic, to deliver ambitious targets for change by 2025. The overall aim of the Pact is to support the delivery of the UK Government's target of achieving zero avoidable plastic waste by end of 2042. These proposals assist DAERA in meeting the aims of the Pact.

In 2020 WRAP published the results of a survey of citizens' attitudes and behaviours associated with plastic packaging. The survey included responses from residents in Northern Ireland. The 'Plastic packaging waste: Understanding existing citizen behaviours, attitudes and openness

¹ <https://www.daera-ni.gov.uk/news/daera-joins-uk-plastics-pact>

to change' report² found that citizens are concerned about plastic packaging, particularly its potential impact on the marine environment and as litter.

While not focused specifically on single-use beverage cups or SUP food containers, the survey found that there was an understanding that governments, retailers, and brands had taken action to address plastic waste but there was still more that could be done.

Three quarters of all respondents said that there are things they personally could do to tackle plastic waste. When asked what actions they currently take, recycling all that they can was the most frequent response. Beyond recycling, the report found that some action is happening to reduce plastic consumption but that it is limited to the most engaged, and driven by a range of motivating factors. The report also concluded that plastic waste reduction behaviours could be simpler and often require facilitation by others, including governments, retailers, and brands.

1.3. Drivers and evidence for change

The high functionality and relatively low cost of plastic means that this material is increasingly used in everyday life. While plastic plays a useful role and provides essential applications in many sectors, its increasing use in short-lived applications, which are not designed for re-use or cost-effective recycling, means that related production and consumption patterns have become increasingly inefficient and linear. The steady increase in plastic waste generation and the leakage of plastic waste into the environment, in particular into the marine environment, must be tackled in order to achieve a circular life cycle for plastics. The significant negative environmental, health and economic impact of certain plastic products calls for the setting up of a specific framework to effectively reduce those negative effects.

For some SUP products, suitable and more sustainable alternatives are not yet readily available and the consumption of such SUP products is expected to increase over time if action is not taken. The primary objective of the Department for this consultation is to influence customer behaviour to promote a significant reduction in usage of SUP beverage cups and food containers.

Across the Northern Ireland retail sector many retailers have already taken steps to reduce the use of SUP beverage cups by offering alternatives at point of sale or incentives to use MU cups. Several retailers have also moved from SUP food containers to ones deemed more environmentally friendly. Unfortunately there are unclear outcomes from these changes as in many cases the infrastructure to process these 'better' alternatives is likely to remain unavailable while the variety of single-use containers and beverage cups e.g. compostable and non-compostable continue to co-exist. While some actions to date are to be commended and it is clear that progress has been made in reducing the use of SUP beverage cups and food containers, further proactive and preventative action must be taken to continue to reduce usage to protect our natural environment.

² <https://wrap.org.uk/resources/report/plastic-packaging-waste-understanding-existing-citizen-behaviours-attitudes>

WRAP's 'Drinks Recycling On-the-Go' (2019) report notes that the majority of take-away hot drink cups (85%) were reported to be disposed of away from home, and only 11% disposed of at home³. Take-away beverage containers all contain a plastic layer which makes them difficult to recycle through household recycling collection services. The plastic content of beverage containers has the potential to contaminate otherwise clean collected paper and card. Council recycling services in Northern Ireland do not accept single-use beverage containers.

Keep Northern Ireland Beautiful (KNIB) carried out Northern Ireland's first Litter Composition Survey in 2019. This DAERA-funded analysis identified that, at any one time, there are an estimated 600,000 items of packaging litter on the streets of Northern Ireland. Of this, 31,841 items, or 5.2%, were calculated to be single-use cups containing plastic, and 19,982 items, or 3.3%, were calculated to be plastic food packaging⁴.

These findings are supported by the results of KNIB's annual litter and marine litter surveys⁵. The 2020 Marine Litter Report⁶ notes that 67% of all observed litter was plastic, and KNIB's litter survey (June to August 2020) found an increase in the littering of SUP packaging and cutlery.

1.4. Scope

The consultation considers the range of SUP beverage cups and food containers which are available. To give an indication of scope, a list of beverage cups and food containers which would be included in the proposals is included in the Scoping Document, provided alongside this report.

Definition of beverage cups for purposes of the consultation:

Cups for beverages, including their covers and lids.

These might include take-away coffee cups and lids, or milkshake cups and covers, for example.

Definition of food containers for purposes of the consultation:

Food containers, i.e. receptacles such as boxes, with or without a cover, used to contain food which:

(a) is intended for immediate consumption, either on-the-spot or take-away,

(b) is typically consumed from the receptacle, and

(c) is ready to be consumed without any further preparation, such as cooking, boiling or heating, including food containers used for fast food or other meal ready for immediate

³ <https://wrap.org.uk/resources/report/drinks-recycling-go>

⁴ Figures calculated from the final data tables of the KNIB LCA report, and can be calculated from the published report. <https://keepnorthernirelandbeautiful.etinu.net/keepnorthernirelandbeautiful/documents/008087.pdf>

⁵ <https://www.keepnorthernirelandbeautiful.org/cgi-bin/generic?instanceID=48>

⁶ <https://www.daera-ni.gov.uk/publications/litter-beaches-northern-ireland>

consumption, except beverage containers, plates and packets and wrappers containing food.

The food containers have then been divided into two scopes, Scope 1 and Scope 2, illustrated in the Scoping Document.

- **Scope 1** includes food containers that are filled at point of sale (e.g. plastic trays for chips, plastic boxes used at salad bars). Consumers would have a choice here to use a SUP food container or use an alternative.
- **Scope 2** includes pre-filled SUP food containers, used for pre-packaged, prepared foods in shops (e.g. a pre-packaged sandwich, salad bowl or prepared fruit box). Consumers would therefore not have an alternative option when purchasing their food.

It is proposed that only Scope 1 food containers should be included within the ambit of the policies at the moment. The rationale for this is that in the case of Scope 2 food containers (a) the consumer has no opportunity to choose to have the food put into a multi-use container and thereby avoid the impact of the policy, and (b) SUNP alternatives are not readily available to producers/retailers in all cases. For further detail on Scope 1 and 2 rationales, see 'Northern Ireland Single-Use Plastic Data Final Report' provided alongside this report.

1.5. Policy options

The primary objective of the proposals is to influence customer behaviour to promote a significant reduction in usage of SUP beverage cups and food containers. The Department worked with WRAP to consider a range of proposals and identify the most effective options for a sustained and substantial reduction in the use of SUP beverage cups and food containers. These options are summarised below and the consultation seeks your views on these proposals.

Three policies are modelled for both SUP beverage cups and food containers:

- A ban on their use;
- A levy of 25p on each cup and 50p on each food container; and
- A voluntary scheme or schemes implemented by businesses that make use of SUP cups or food containers, which may comprise a range of charges for cups/food containers, discounts for MU cups/food containers and communication efforts. This is modelled as having the same effect as a 10p levy for a beverage cup and 25p for a food container.

1.6. How would a proposed levy be used?

The proceeds of any levy will be collected and processed by DAERA and used to both promote and sustain the wider NI environmental sector.

The levy will be reinvested to support a broad range of local and country wide environmental projects, supporting small, medium, and large projects funded through the NI Environment Fund, which enables not for profit organisations and councils to deliver key environmental interventions.

2. Methodology

2.1. Impact Assessment methodology

In order to conduct the impact assessment a mathematical model was created in order to assess each of the proposed policy options. The model creates a range of scenarios based on each of the policy options and compares these to a baseline 'do nothing' scenario. The scenarios include measures of plastic waste prevented, cup/food container sales, money raised from any levies, final destination of disposed containers and many other parameters.

The model consists of three layers:

- A bottom layer where the demand for SUP, SUNP and MU containers is forecasted in a series of scenarios. Outputting a year-by-year prediction of the number of beverage cups/food containers used and discarded.
- A middle layer which matches the demand scenarios with a range of user-specified parameters. This defines the total number of beverage cups/food containers estimated in the bottom layer in terms of material of construction, how may fall in each scope, the method of disposal, and the final destination of the containers.
- A top layer which compares the results of the various scenarios to the baseline scenario.

The main purpose of the model is to create scenarios for each of the policy options which can then be compared against a baseline (and each other). The model allows for various factors to be used as comparisons encompassing various indicators of plastic waste and use, as well as other factors such as money raised in levies.

See 'An Introduction to the Single-use Plastics Assessment Framework' document, provided alongside this report, for the full introduction to the Single-Use Plastics Assessment Framework.

The model work based on a set of policy definitions using data gathered from various sources for entry into the various layers of the model. Where appropriate data could not be found assumptions had to be made instead. See 'Northern Ireland Single-Use Plastic Data Final Report' for the full list of assumptions, data and policy definitions.

Assumptions were made on the supply and productions costs, manufacturing costs, demand for containers, disposal routes, and volumetric data. Key assumptions were on when SUNP containers would become available, the cost for MU food containers, the likelihood of disposal for multi-use items per year, the % of beverage cups and food containers in the scope of the policy, and how each of the policies would affect demand for beverage cups and food containers.

An example set of results from the model is the number of containers disposed each year by disposal route. Table 1 shows the baseline (2021) estimated number of SUP cups by collection method covering large, and Small and Medium-sized Enterprises (SME) businesses, also splitting out the number in the health care sector which were considered exempt. The figures in Table 1 are the baseline SUP cup collection figures which future years are built off.

Table 1: Number of SUP Cups Collected by Method

Business size	Household collection	Commercial collection	Street collection	Litter	Total
Large	6,714,635	30,097,897	10,743,416	6,887,038	54,442,986
SME	1,046,437	4,690,581	1,674,299	1,073,305	8,484,621
Large – excluded	7,071	671,699	21,212	7,071	707,052
SME – excluded	70,705	6,716,992	212,116	70,705	7,070,518

Table 2 shows the baseline (2021) estimated number of Scope 1 and Scope 2 SUP food containers by collection method covering large and SME businesses, also splitting out the number in the health care sector which were considered exempt. The figures in Table 2 are the baseline SUP food container collection figures which future years are built off.

Table 2: Number of SUP FCs Collected by Method

Inclusion	Business size	Household collection	Commercial collection	Street collection	Litter	Total
Scope 1*	Large	3,532,431	7,064,861	2,119,458	1,412,972	14,129,722
	SME	3,532,431	7,064,861	2,119,458	1,412,972	14,129,722
Scope 2	Large	10,173,400	55,105,917	12,716,750	6,782,267	84,778,335
	SME	1,526,010	8,265,888	1,907,513	1,017,340	12,716,750
Exempt	Large	14,130	1,342,324	42,389	14,130	1,412,972
	SME	141,297	13,423,236	423,892	141,297	14,129,722

*Scope 1 large and SME business have the same values as each is estimated to be 50% of Scope 1 food containers

2.2. General questions on approach

The proposed policies could affect business of all sizes in Northern Ireland from large multinationals to small local businesses. The size of the organisation affected could alter the potential impact. As such it is important to carefully consider the scope of which organisations should be affected by these proposed policies.

What size of businesses should the proposed policies apply to? (select all that apply)	
<input type="checkbox"/>	Small (1-49 employees)
<input type="checkbox"/>	Medium (50-249 employees)
<input type="checkbox"/>	Large (250+ employees)
<input type="checkbox"/>	None of the above

The potential policies selected for this consultation are broad and have seen use elsewhere however, they are not completely exhaustive. Other potential policies may exist that could also achieve the stated policy aims.

Are you aware of any other policy options, not including those already listed, that would be suitable to achieve the stated policy aims?	
<input type="checkbox"/>	Yes
<input type="checkbox"/>	No
If 'yes' please explain	

2.3. Materials in scope

2.3.1. SUP beverage cups

Three policies are modelled for SUP cups:

- A ban on their use, which could be implemented fully immediately or phased in over a period of time giving companies time to adapt;
- A levy of 25p on each cup; and
- A voluntary scheme or schemes implemented by businesses that make use of SUP cups, which may comprise a range of charges for cups, discounts for MU cups and communication efforts. This is modelled as having the same effect as a 10p levy.

It is proposed that the levy should take the form of a charge that is visible to the consumer - so it would be shown on menus, receipts or similar. For the ban and the levy, the policy would provide

for an exemption for uses in the healthcare sector, where SUP items may be needed for the purpose of infection control. No exemption is needed within the context of a voluntary scheme.

2.3.2. SUP food containers

Three policies are also modelled for Scope 1 SUP food containers. As defined, the policy options applied to Scope 1 food containers are broadly similar to those modelled for cups:

- A ban on their use, which could be implemented fully immediately or phased in over a period of time giving companies time to adapt;
- A levy of 50p on each SUP food container; and
- A voluntary scheme or schemes implemented by businesses that make use of SUP food containers, which may comprise a range of charges for food containers, discounts for consumers who use MU food containers and communication efforts. This is modelled as having the same effect as a 25p levy.

The proposed levy is higher than that proposed for a SUP beverage cup, because although the value of foodstuffs sold in SUP food containers varies considerably, a meal sold in a food container may often be of significantly higher value than a cup of tea or coffee, making the impact of a 25p levy proportionately smaller.

There is an exemption for Scope 1 food containers used in the healthcare sector, and in the current modelling Scope 2 food containers have not been included as explained in the introduction.

Which of following items, if any, should be included within the scope of proposed policy measures? (select all that apply)

- | | |
|--------------------------|--|
| <input type="checkbox"/> | Plastic single-use cups |
| <input type="checkbox"/> | Card single-use cups lined with plastic |
| <input type="checkbox"/> | Takeaway food containers (food containers provided with meals purchased to take off the premises) – Scope 1 |
| <input type="checkbox"/> | Pre-filled food containers – Scope 2 |
| <input type="checkbox"/> | Self-fill food containers (food containers that the customers fill themselves before purchase e.g. at a salad bar) – Scope 1 |
| <input type="checkbox"/> | Other |

If 'other' please explain below

Consumers have limited alternative options when purchasing food in pre-filled (Scope 2) containers. That is, the consumer does not have an option to make a purchase without the container. For this reason, it was not possible to model the impact of policies on pre-filled (Scope 2) food containers, however, these are included within the scope of this consultation.

In your view is it practical to include pre-filled (Scope 2) plastic food containers, including those which are plastic-lined, within the scope of these policies?

Yes

No

Don't Know

If 'yes' please explain

2.3.3. Materials in scope questions

The current proposed measures focus on plastics for the reasons outlined in the introduction. In the future further measures or updates to the proposed measures may expand to cover other materials.

In addition to plastic, should any other materials be included in future measures? (select all that apply)

Metal

Glass

Paper/card

None of the above

Other

If 'other' please explain below

In the proposed measure the levy is applied at the point of purchase and targeted at consumers. This has been chosen as it maximises the visibility of the levy making sure the consumer is aware they are paying it and therefore increasing the chance of behaviour change. The levy could instead be placed on producers, this would mean the levy was less visible. Producers could still potentially pass the levy onto consumers, but the consumer would not see this as a

separate cost but instead combined into the total.

If a levy were to be introduced, who should pay it, producers or consumers? (select one)	
<input type="checkbox"/>	Producers
<input type="checkbox"/>	Consumers
<input type="checkbox"/>	Other
If 'other' please explain below	

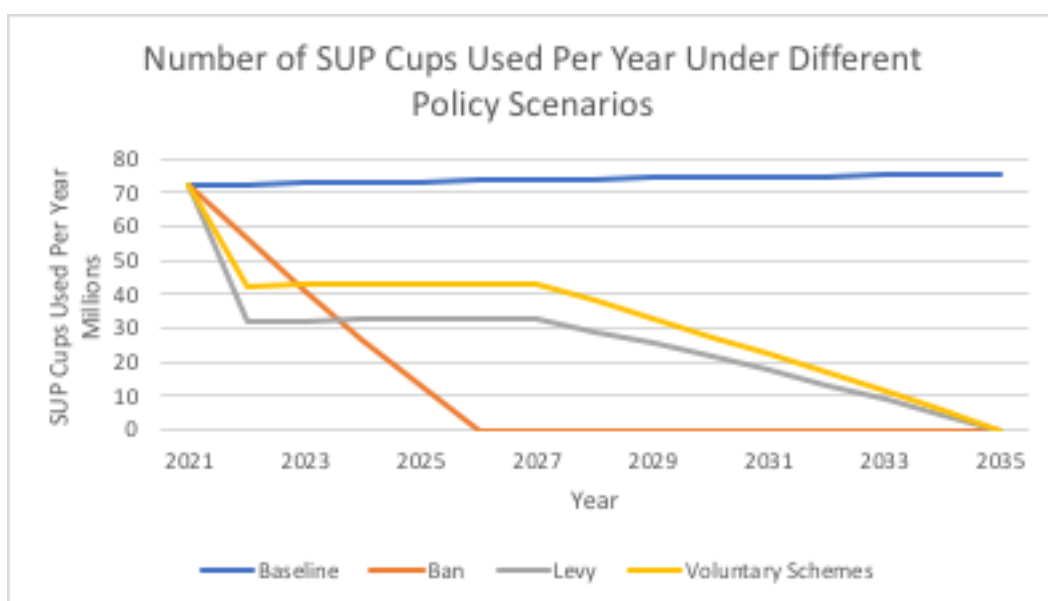
3. Results

3.1. SUP Beverage cups

The Department worked with WRAP, in conjunction with Eunomia and Red Scientific, on an impact assessment (IA) to analyse the impact of each of the options. This was done by using a series of models to evaluate the impact of each option.

Please note, the references to the voluntary scheme are made on the assumption that the majority of retailers would join the scheme and that the scheme has longevity. Any differences to these assumptions could undermine the effectiveness of a voluntary scheme.

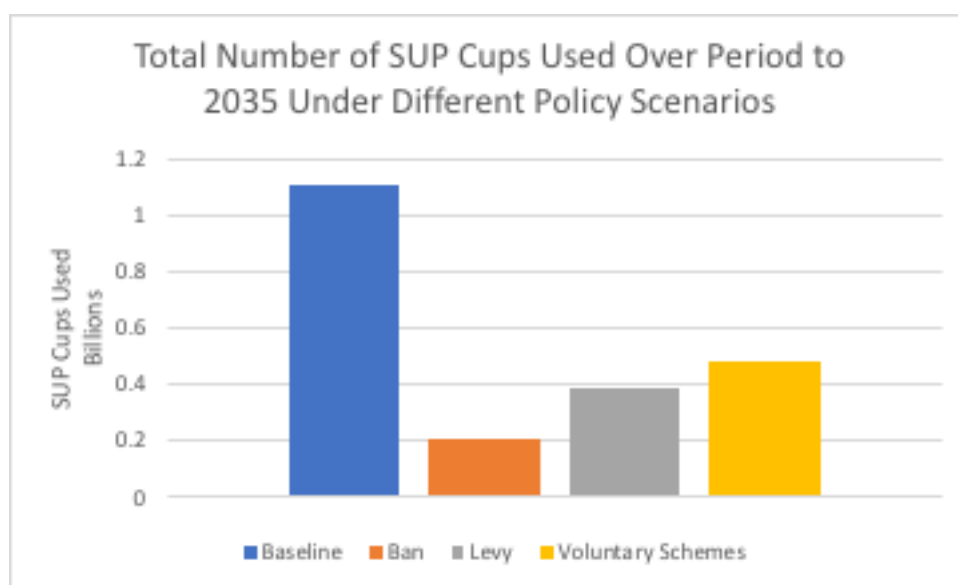
Figure 1



The results of the impact assessment on the number of SUP beverage cups used per year up to 2035 are summarised in the line graph at Figure 1. The statistics assume that the ban, levy

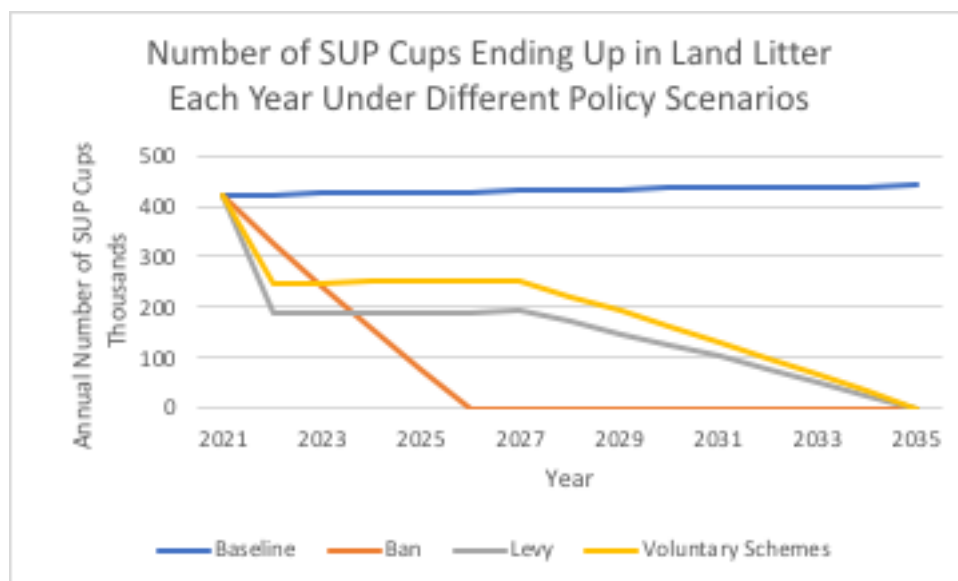
or voluntary scheme would begin 1 January 2022 for the purposes of modelling. They show that a ban would have the most immediate impact, with all SUP beverage cups phased out by 2026. A levy would have the next most effective reduction, with a drop of approximately 40 million cups used per year by 2022 and reducing to zero by 2035. This assumes the availability of alternatives which would lead to this decrease. The voluntary scheme follows a similar trajectory to the levy, but with a higher rate of usage of SUP beverage cups. The baseline ('do nothing') shows a gradual increase in number of SUP beverage cups used each year.

Figure 2



The overall number of cups used over the period until 2035 is summarised in Figure 2. The baseline or do nothing approach would mean almost 1.1 billion SUP beverage cups used by 2035. The ban has the most impact on reducing SUP beverage cups, with 200 million cups being used in this period if a ban were to be introduced (this is taking into account a possible phased approach or lead-in time to a ban). The levy would lead to the usage of approximately 400 million SUP beverage cups in the same period, whilst the voluntary scheme would mean a usage of approximately 500 million cups over the period.

Figure 3



The IA also considered how each option impacted on land litter. Figure 3 shows that the ban has a significant impact on SUP land litter, reducing to zero by 2026. Once again, the levy is the next most effective scenario and meets the same levels of land litter from discarded SUP beverage cups as the ban by 2035. The voluntary scheme follows a similar trajectory to the levy, but with slightly higher levels of land litter. Whilst the baseline scenario sees land litter rise slightly.

Figure 4

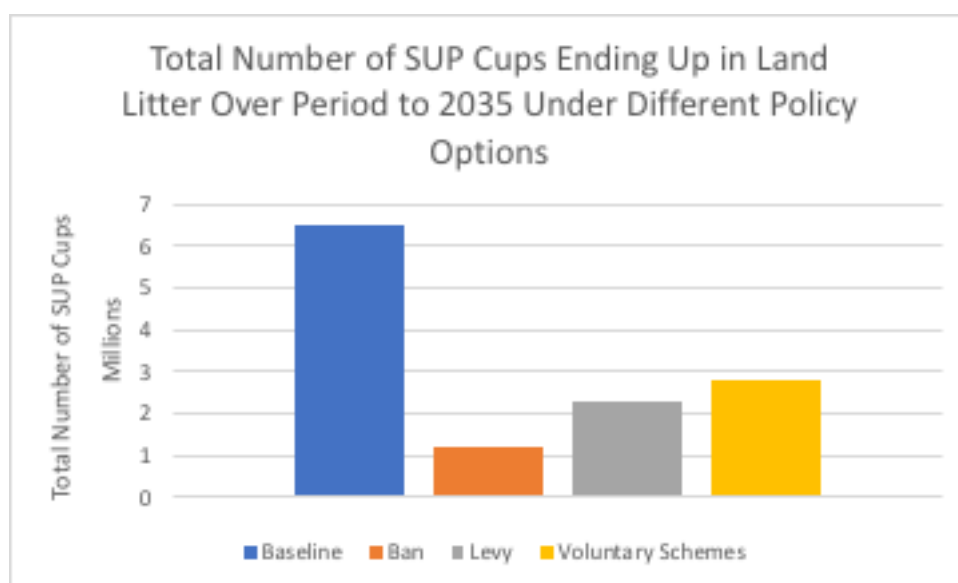
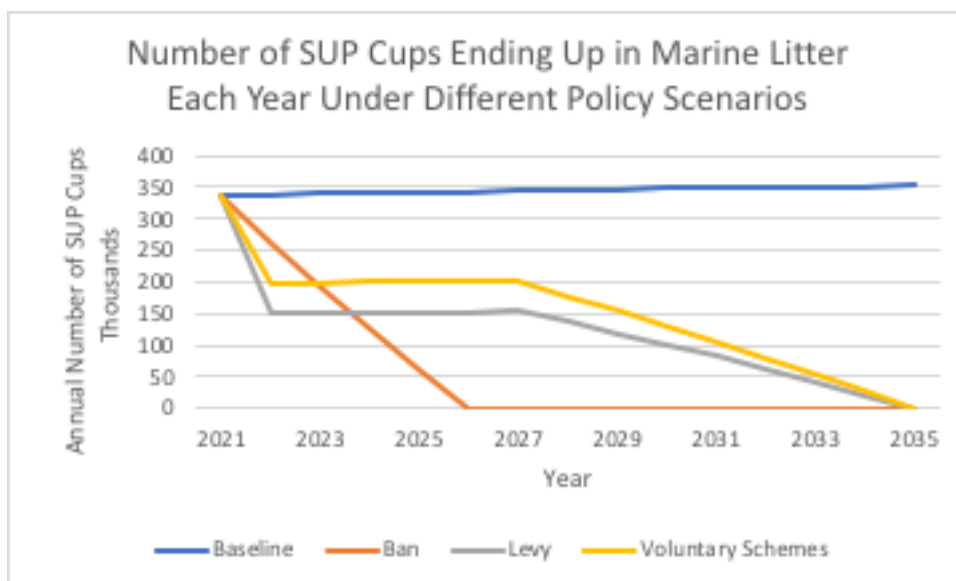


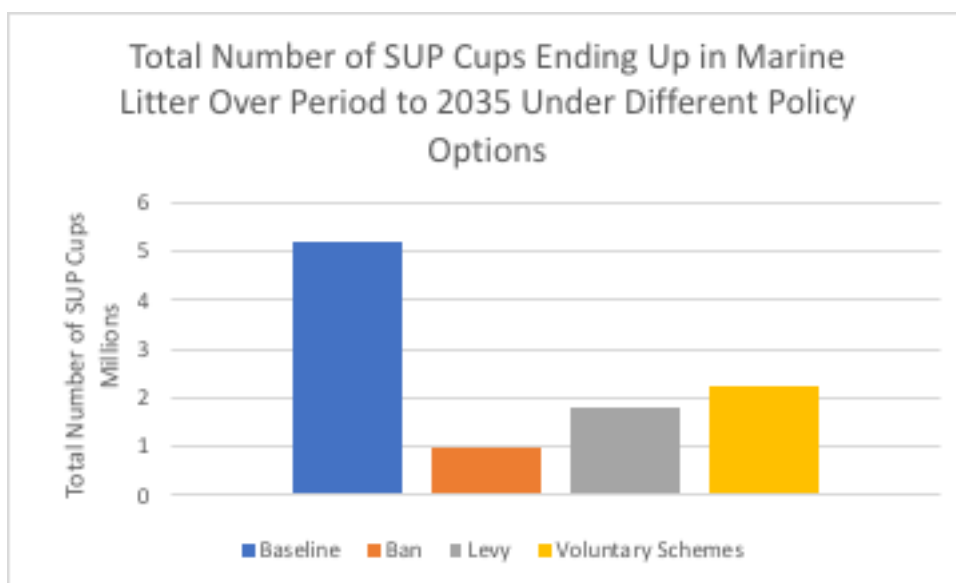
Figure 4 shows total number of SUP beverage cups which would end up as land litter. Clearly, the ban has the biggest impact, with approximately 1 million SUP cups in land litter, compared to 6.5 million cups if no action is taken. A levy would see just over 2 million SUP beverage cups as land litter and the voluntary scheme would result in almost 3 million cups littered.

Figure 5



Figures 5 and 6 show the expected tonnage of marine litter from discarded SUP beverage cups over the period. Figure 5 gives a very similar picture to that of land litter, with the ban having the most immediate impact, the levy being next most effective, with the voluntary scheme following a less effective trajectory and all reaching the same level by 2035. Figure 6 similarly shows that the ban would have the biggest reduction in the number of SUP beverage cups finding their way into marine litter, closely followed by the levy and then the voluntary scheme.

Figure 6



Over its life span the IA predicts a levy would raise around £70 million pounds reaching a maximum of around £7.3 million in 2027 and falling to £0 in 2035 with the elimination of SUP cups. The ban and voluntary scheme policy options would raise no funds as they do not contain a levy element.

A key assumption in the IA is the availability of single-use non plastic alternatives to SUP cups, especially the date at which they will become widely available. The model is particularly sensitive to the availability of these alternatives as it impacts when SUP beverage cup consumption can be replaced outside of the use of multiuse cups which are assumed to only be used by a minority of the population even in 2035.

In your view, if no policies or measures were to be introduced, what is the earliest date that the market might develop and supply single-use non-plastic cups? (select one)

	They are already available
	The market would not develop and supply single-use non-plastic cups
	2022
	2023
	2024
	2025
	2026+
	Don't know
	Other

If 'other' please explain below

Please describe the single-use non-plastic cup that is already available. (Only answer if 'they are already available' was selected for the previous question)

3.1.1 Ban

The government estimates that 4.7 billion plastic straws, 316 million plastic stirrers, and 1.8 billion plastic-stemmed cotton buds were used in England every year. Many of these items ended up discarded and polluting waterways and the ocean. The Department of Environment, Food and Rural Affairs (Defra) therefore introduced a ban on supplying plastic straws, plastic stirrers, and plastic-stemmed cotton buds in England on 1 October 2020. By banning these items, it was government's aim to protect marine wildlife from these sources of avoidable plastic waste.

If a ban on SUP beverage cups were introduced in Northern Ireland, it could be introduced gradually, with SUP beverage cups phased out over a period of time. A single date for an outright ban could also be considered, to give all parties time to prepare.

If a ban were to be introduced on SUP beverage cups (including plastics or bioplastics) how should the ban be implemented? (select one)

Fully implemented from the outset

Phased in over 6 months

Phased in over 1 year

Other

If 'other' please explain below

If a ban on were to be introduced on SUP beverage cups (including plastics or bioplastics) what year should a ban on SUP beverage cups be introduced? (select one)

2022

2023

2024

2025

2026+

Other

If 'other' please explain below

3.1.2 Levy

A levy could be introduced on all SUP beverage cups (as outlined in the Scoping Document). It is proposed that the levy should take the form of a charge that is visible to the consumer - so it would be shown on menus, receipts or similar. The levy would be introduced from a set date to be determined. From that date forwards, the levy would apply. Consumers could choose to pay the levy or opt instead to use a MU cup or SUNP alternative, provided by the retailer. The levy charge is suggested at 25p per SUP beverage cup.

It is believed that the levy will encourage behaviour change, very much like the carrier bag levy

has done. The carrier bag levy is a good example of the impact that can be made. Published annual usage statistics for the existing levy show that the introduction of the levy across NI in 2013 had a significantly positive impact, reducing carrier bag use by 73.2% (in excess of 1.5 billion bags) from the 2012 baseline figure of 300 million carrier bags.

If a levy were to be introduced on SUP beverage cups (including plastics or bioplastics) what year should a levy on SUP beverage cups (of any scope) be introduced? (select one)	
<input type="checkbox"/>	2022
<input type="checkbox"/>	2023
<input type="checkbox"/>	2024
<input type="checkbox"/>	2025
<input type="checkbox"/>	2026+
<input type="checkbox"/>	Other
If 'other' please explain below	

If a levy were to be introduced on SUP beverage cups (including plastics or bioplastics) what level should it be set at? (select one)	
<input type="checkbox"/>	£0.10-£0.24
<input type="checkbox"/>	£0.25-£0.49
<input type="checkbox"/>	£0.50-£0.74
<input type="checkbox"/>	£0.75-£1.00
<input type="checkbox"/>	Other
If 'other' please explain below	

3.1.3 Voluntary retailer-led scheme

A voluntary retailer-led scheme could be initiated and set up by the retail sector. Some organisations might choose to work together as part of a joint initiative, although they might follow different plans in their aims to reduce the usage of SUP beverage cups. A voluntary scheme might see retailers adding a charge to the SUP beverage cup, or offering incentives for customers to use alternatives, for example.

A good example of a voluntary scheme is Ireland's Conscious Cup campaign, a non-profit organisation started in 2016 by a group of concerned individuals who, inspired by similar initiatives of cafes and citizens around the world, are aiming to reduce and eventually eliminate single-use cups in Ireland. Their goal is to eliminate single-use in the Cafe and Food to Go sector by encouraging cafes and other outlets to incentivise customers to bring their own.

Do you believe a voluntary scheme for SUP beverage cups, of any form, would be effective in meeting the goal of a significant reduction in SUP cup use?

Yes

No (If answered no, do not complete next two questions)

What design of voluntary scheme would be successful in terms of administration, monitoring, and applications?

What are the key elements for a successful voluntary scheme for SUP beverage cups? (select all that apply)

The ability to in some way enforce signatories to enact the agreement

For either internal or external monitoring to be conducted

For a significant amount of the affected organisations (by sales volume) to be signed up

A consumer facing communications campaign explaining the purpose and aims of the agreement

For the agreement to contain agreed action for all signatories to undertake

For signatories to the agreement to have flexibility in achieving the aims of the agreement

Other

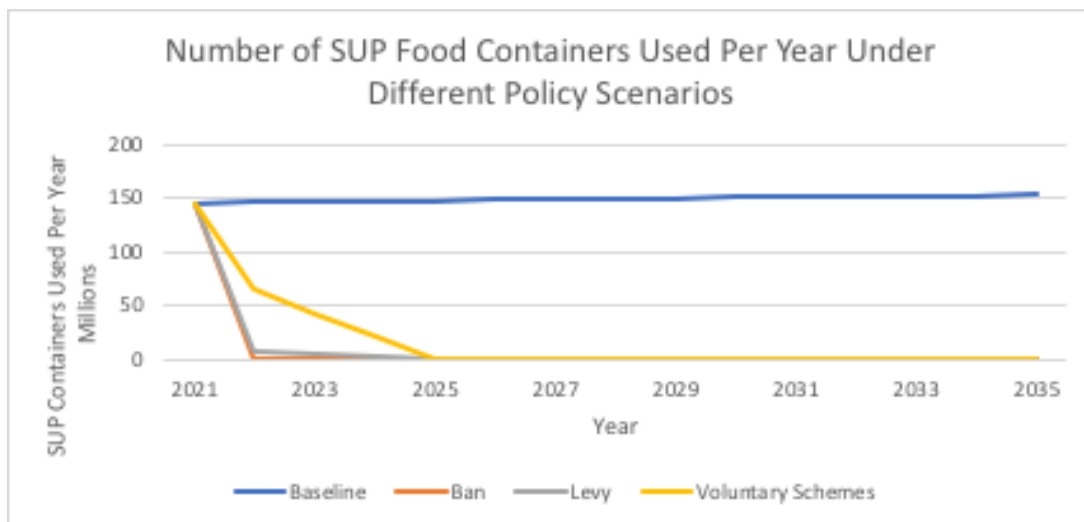
If 'other' please explain below

3.2 SUP food containers

The results of the impact assessment on the number of SUP food containers used per year up to 2035 are summarised in the line graph at Figure 7. This shows that both the ban and the levy

have a similar impact on the reduction in the usage of food containers. The voluntary scheme has a slower trajectory but may perform similarly to the other two options by 2025 if the voluntary scheme has significant uptake across all retailers and continues for the whole period.

Figure 7



Once again, Figure 8 shows a dramatic reduction in the number of SUP food containers used in the period up to 2035 with either the ban or levy options. Over the period to 2035, the baseline (do nothing) usage is approximately 2.2 billion containers used. The ban achieves reductions of around 146 million total containers and the levy leads to a reduction of approximately 160 million total containers used over the period. The voluntary scheme also leads to a reduction to approximately 275 million containers used over the period.

Figure 8

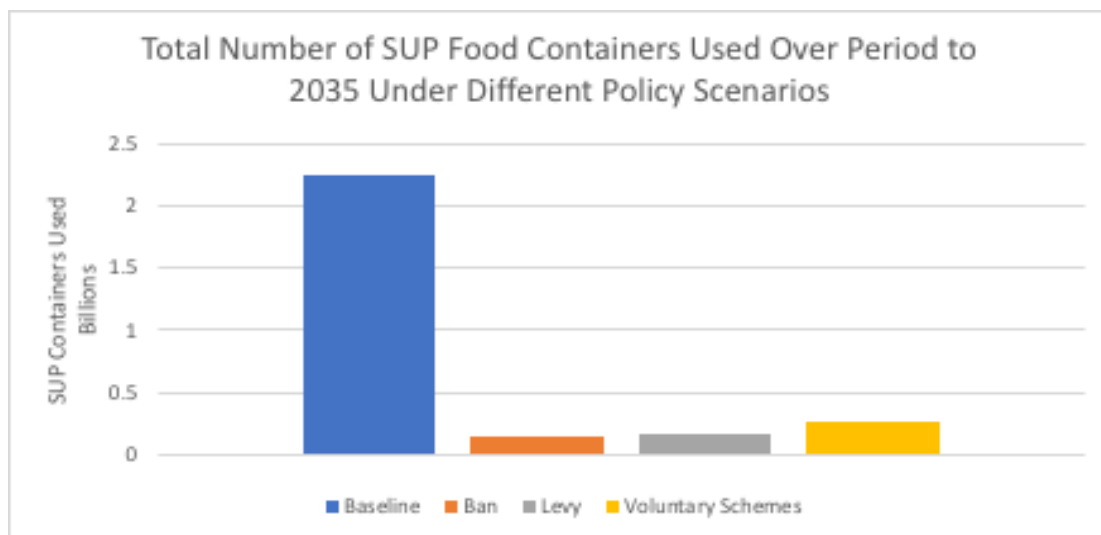


Figure 9

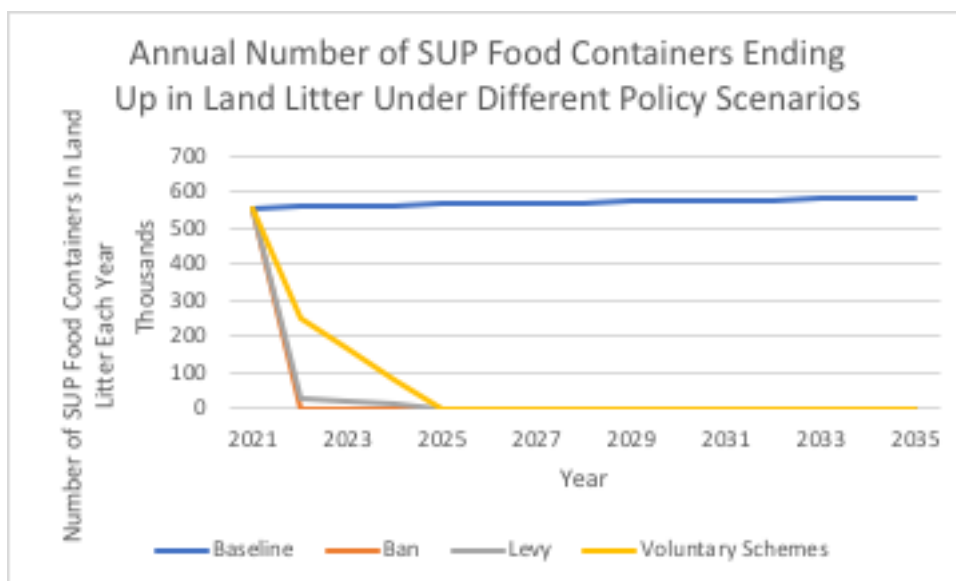


Figure 9 shows the impact on land litter of the various scenarios. Once again, both the ban and levy have a similar impact, with a reduction to almost zero after the first year, and the voluntary scheme meeting the same reduction by 2025. Whilst the baseline scenario sees land litter rise slightly. Figure 10 shows the overall reduction in SUP food containers in land litter up to 2035 and the ban and levy have a very positive impact, with the voluntary scheme, if widely applied, very close behind.

Figure 10

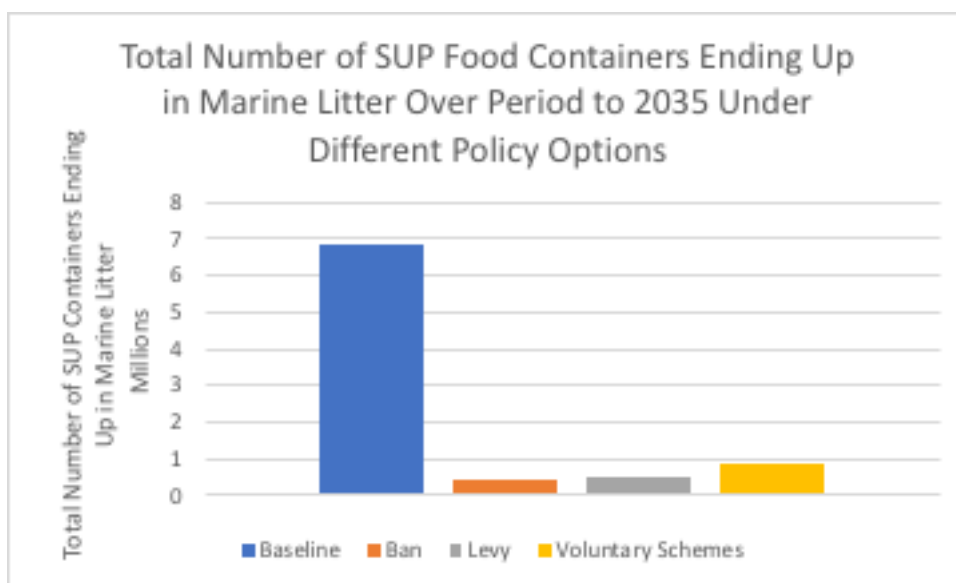
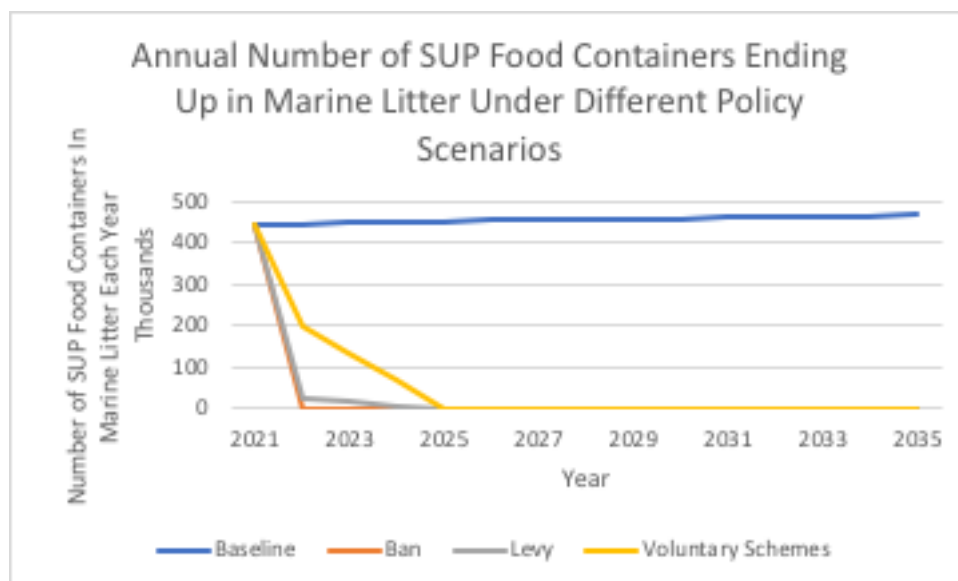
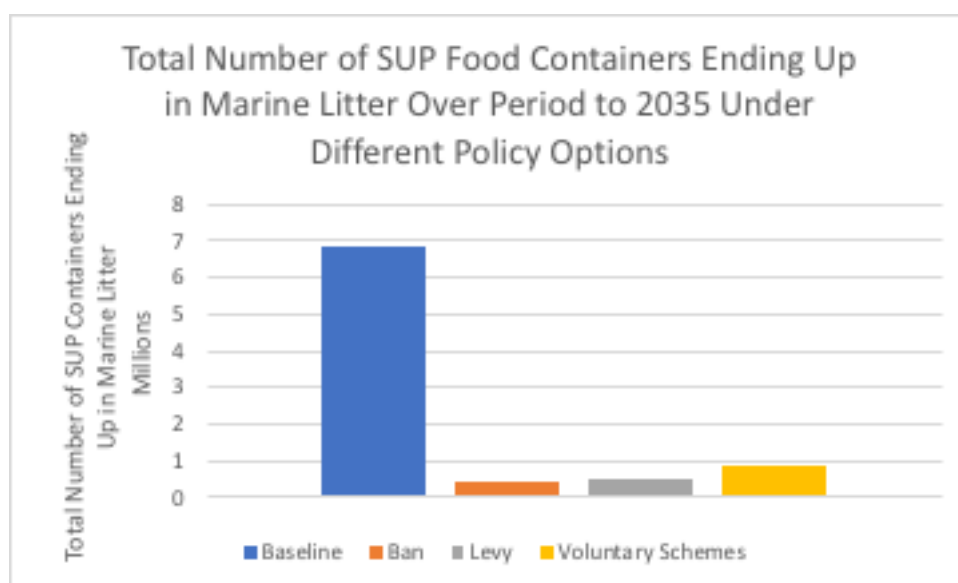


Figure 11



Figures 11 and 12 show similar results on the impact on marine litter. The ban and the levy have the greatest and most immediate impact in Figure 11, with the voluntary scheme potentially achieving a similar reduction by 2025. Figure 12 shows that both the ban and the levy have very similar impact on the reduction of marine litter, with well under 1 million items found, with the voluntary scheme close behind.

Figure 12



Over its life span the IA predict a levy on Scope 1 food containers would raise around £1.4 million pounds reaching a maximum of around £0.7 million pounds in the 2022 year and falling to £0 in 2025 onwards with the elimination of SUP food containers. The ban and voluntary scheme policy options would raise no funds as they do not contain a levy element. The statistics assume that the ban, levy or voluntary scheme would begin 1 January 2022 for the purposes of modelling.

A key assumption in the IA is the availability of SUNP alternatives to SUP food containers, especially the date at which they will become widely available. The model is particularly sensitive to the availability of these alternatives as it impacts when SUP food container consumption can be replaced outside of the use of multiuse food containers which are assumed to only be used by a minority of the population even in 2035.

In your view, if no policies or measures were to be introduced, what is the earliest date that the market might develop and supply SUNP (including plastic lining) food containers? (select one)

	They are already available
	The market would not develop and supply SUNP food containers
	2022
	2023
	2024
	2025
	2026+
	Don't know
	Other

If 'other' please explain below

Please describe the SUNP food container that is already available. (Only answer if 'they are already available' was selected for the previous question)

What types of food containers should be targeted by the proposed measures? (select all that apply)

	Takeaway food containers (food containers provided with meals purchased to take of the premises)
	Pre-filled food containers
	Self-fill food containers (food containers that the customers fill themselves before purchase e.g. at a salad bar)
	Other

If 'other' please explain below

3.2.1 Ban

If a ban were introduced, it could be introduced gradually, with SUP food containers phased out over a period of time. A single date for an outright ban could also be considered, to give all parties time to prepare.

If a ban on SUP food containers were introduced how should the ban be implemented? (select one)

	Fully implemented from the outset
	Phased in over 6 months
	Phased in over 1 year
	Other

If 'other' please explain below

Is there an alternative method of introducing the ban, not mentioned in this consultation?	
	Yes
	No
If 'yes' please explain	

In what year should a ban on SUP food containers be introduced? (select 1 option for each row, put cross in selected box)						
Takeaway food containers	2022	2023	2024	2025	2026	Later
Pre-filled food containers	2022	2023	2024	2025	2026	Later
Self-fill food containers	2022	2023	2024	2025	2026	Later

3.2.2 Levy

A levy could be introduced on all SUP food containers. It is proposed that the levy should take the form of a charge that is visible to the consumer - so it would be shown on menus, receipts or similar. The levy would be introduced from a set date to be determined. From that date forwards, the levy would apply. Consumers could choose to pay the levy or opt instead to use a MU container or SUNP alternative, provided by the retailer. The levy charge is suggested at 50p per SUP food container.

If a levy on SUP food containers were introduced what level should it be set at? (select one)	
<input type="checkbox"/>	£0.25-£0.49
<input type="checkbox"/>	£0.50-£0.74
<input type="checkbox"/>	£0.75-£0.99
<input type="checkbox"/>	£1.00-£1.24
<input type="checkbox"/>	£1.25-£1.50
<input type="checkbox"/>	Other
If 'other' please explain below	

Effectively, a levy on pre-filled SUP food containers places the emphasis on change with the producer, as the consumer has no choice but to accept the levy if they wish to purchase the food and there is no clear way to place the levy directly on the consumer. The only way for pre-filled containers to 'offer alternatives' is for the producer to make the change to SUNP. This means a levy on pre-filled SUP food containers would not be as visible to consumers and there may not be the opportunity for consumer to change their own behaviour.

Would a levy be effective in reducing the consumption of pre-filled plastic food containers?	
<input type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

How could a levy on pre-filled plastic food containers be implemented in terms of scheme administration, monitoring, and applications? (Only answer if 'yes' was selected for the previous question)

Why would a levy on pre-filled SUP food containers be ineffective? (Only answer if 'no' was selected for the previous question)

Would a levy on producers be more or less effective in reducing consumption of SUP packaging than a levy on consumers? (select one)

	More
	The same
	Less
	Don't know

3.2.3 Voluntary retailer-led scheme

A voluntary retailer-led scheme could be initiated and set up by the retail sector. Some organisations might choose to work together as part of a joint initiative, although they might follow different plans in their aims to reduce the usage of SUP food containers. A voluntary scheme might see retailers adding a charge to the SUP food containers, or offering incentives for customers to use alternatives, for example.

National retailers are also beginning to introduce more loose and unwrapped produce to reduce single-use plastic packaging. Consumers can, for example, bring their own refillable container, use retailer-provided containers (e.g. paper bags) or purchase and take home items without using packaging at all.

Asda successfully ran a trial of its 'Refill Zone' at a store in Leeds, where shoppers can buy loose and unpackaged items. The scheme is now being extended to more Asda stores. Marks and Spencer has introduced its 'Fill Your Own' trial to 11 of its stores, including its Lisburn store. Results from Waitrose's 11-week 'Unpacked' refill trial in 2019, found that 98% of single-use packaging was eliminated across the 200 products in their trial, and that all plastic packaging (including single-use and re-usable) was reduced by 83%. The scheme also proved popular with consumers and has been extended to more Waitrose stores.

Do you believe a voluntary scheme for SUP food containers, of any form, would be effective in meeting the proposed reductions?

	Yes
	No

If 'yes' what design of voluntary scheme would be successful in terms of scheme administration, monitoring, and applications?

What are the key elements for a successful voluntary scheme for SUP food containers? (select all that apply)

<input type="checkbox"/>	The ability to in some way enforce signatories to enact the agreement
<input type="checkbox"/>	For either internal or external monitoring to be conducted
<input type="checkbox"/>	For a significant amount of the effected organisations (by sales volume) to be signed up
<input type="checkbox"/>	A consumer facing communications campaign explaining the purpose and aims of the agreement
<input type="checkbox"/>	For the agreement to contain agreed action for all signatories to undertake
<input type="checkbox"/>	For signatories to the agreement to have flexibility in achieving the aims of the agreement
<input type="checkbox"/>	Other

If 'other' please enter below

3.3 Preferred approach

This consultation proposes a number of options to tackle the increase of SUP beverage cups and food containers. It summarises the findings of the modelling which was done to analyse each option. The aim of the consultation is to seek views on the most effective way to ensure a sustained and substantial reduction in SUP beverage cups and food containers. With this in mind:

Do you agree with the results of the modelling? (one per row)

Cups	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Food containers	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

If 'no' for cups please explain here

If 'no' for food containers please explain here

What is your preferred option to meet the proposed reductions? (one per row)							
Cups		Ban		Levy		Voluntary scheme	Other
Food containers		Ban		Levy		Voluntary scheme	Other
Cups 'other' please specify							
Food containers 'other' please specify							
Please describe why this is your preferred option for cups.							
Please describe why this is your preferred option for food containers.							

3.4 Administration and enforcement

What should the proposed measures include to be successful/effective? (select all that apply)	
<input type="checkbox"/>	Penalties for non-compliance, for example, fines
<input type="checkbox"/>	Provision of clear guidance on, scope, obligations, actions etc...
<input type="checkbox"/>	Creation of a scheme administrator/regulator
<input type="checkbox"/>	Provision of independent monitoring
<input type="checkbox"/>	Other
If 'other' please explain below	

Who should monitor the impact of the measures? (select only one)

- DAERA
- The Northern Ireland Environment Agency (NIEA)
- An independent organisation (e.g., a charity)
- A newly created public body
- The companies affected
- Don't know
- Other

If 'other' please explain below

If a levy were adopted how should any funds raised from the collection of levies be distributed? (Please pick only 3 including 'other')

- Regulation and enforcement of the measures
- Waste reduction initiatives
- Litter campaigns
- To encourage recycling
- Wildlife/ecological initiatives
- SUP reduction activities
- Other

If 'other' please explain below

4 Summary and conclusion

Officials will use the results of this consultation to guide final policy decisions.

There is renewed emphasis on minimising the use of SUP in line with the UK Government's 25-year Environmental Plan. Promotion of a greater awareness by members of the public in NI of their environment and how we all use and dispose of our natural resources must be paramount in our thinking at both local and global levels. While the NI Assembly work primarily for everyone in NI we also must consider global environmental concerns and as such *"Act Locally, Think Globally"*.

5 How to respond to this consultation

Responses are invited via Citizen Space at: <https://www.daera-ni.gov.uk/consultations>

By email via: epgni@daera-ni.gov.uk

Or by post to: SUP and Waste Legislation Team,

Klondyke, Cromac Avenue,

Gasworks Business Park, Lower Ormeau Road,

Belfast, BT7 2JA.

We would encourage an online response in order to limit any environmental impact.

Those Affected: This is a public consultation, open to all who may have an interest and who wish to be part of improving the environmental impact of SUP beverage cups and food containers. It is hoped that many will take an interest in this consultation and provide feedback. Retailers, producers, those involved in environmental issues, local authorities and members of the public. All views are welcomed by the Department.

Duration: This consultation will run for a period of 8 weeks. It will open on **18 October 2021** and close on **17 December 2021**.

5.1 After the consultation

Confidentiality: The Department will publish a summary of responses following completion of the consultation process. Your response and all other responses to the consultation, may be disclosed on request. The Department can refuse to disclose information only in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation. Any confidentiality disclaimer generated by your IT system in e-mail responses will not be treated as such a request.

Data Protection: Section 8(e) of the Data Protection Act 2018 permits processing of personal data when necessary for an activity that supports or promotes democratic engagement. Information provided by respondents to this consultation exercise will be held and used for the purposes of the administration of this current exercise and subsequently disposed of in accordance with the provisions of the Data Protection Act 2018 and UK General Data Protection Regulation.

The Freedom of Information Act 2000 gives the public a right of access to any information held by a public authority (the Department in this case). This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity, should be made public or treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances.

The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- the Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- the Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature;
- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.
- For further information about confidentiality of responses, please contact the Information Commissioner's Office:

Email: ni@ico.org.uk

Website: [Information Commissioner's Office](#)

Alternative Formats

This document is also available on the DAERA website at:

<https://www.daera-ni.gov.uk/consultations/consultation-reduction-single-use-plastic-beverage-cups-and-food-containers>

You can request a copy of this document in other formats, such as:

- Paper Copy
- Large Print
- Braille
- Other languages

To get a copy of this document in another format contact:

Single Use Plastic and Waste Legislation Team

Email: epgni@daera-ni.gov.uk

This page is intentionally left blank



Subject:	Consultation response to Draft Environment Strategy for Northern Ireland
Date:	7 December 2021
Reporting Officer:	Siobhan Toland, Director, City and Neighbourhood Services Department
Contact Officers:	Mark Challis, Policy and Business Development Officer

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	The purpose of the report is to present the compiled council draft response to the consultation on the Draft Environment Strategy for Northern Ireland for Members to consider and agree. The Draft Environment Strategy for Northern Ireland document is attached in Appendix 1 and the compiled council draft response is attached in Appendix 2.
2.0	Recommendations
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> Review the report and the Council's draft consultation response to the Draft Environment Strategy for Northern Ireland (Appendix 2) and agree to the submission to DAERA by the 19th January 2022.

3.0	Main report
3.1	The Consultation https://www.daera-ni.gov.uk/consultations/environment-strategy-consultation opened on 11 November 2021 and with a closing date of 19 January 2022 at 16:00.
3.2	The Department of Agriculture, Environment & Rural Affairs (DAERA), on behalf of the Northern Ireland Executive, has published a consultation on the draft Environment Strategy and welcomes the views of everyone across Northern Ireland.
3.3	DAERA advised that the Environment Strategy is intended to be an overarching document setting out Northern Ireland's environmental priorities for the coming decades and will form part of the Green Growth agenda (the Green Growth Strategy will provide more detail on actions in respect of climate change & greenhouse gas emissions).
3.4	The Department advise that this Environment Strategy will form the basis for a coherent and effective set of interventions that can deliver real improvements in the quality of the environment and thereby improve the health and well-being of all who live and work here; elevate Northern Ireland to an environmental leader; create opportunities to develop our economy; and enable us to play our part in protecting the global environment for decades to come
3.5	Belfast City Council welcomes the opportunity to provide feedback and our full response (Appendix 2) provides the specific commentary for members consideration. Members are advised that given this consultation was only issued on 11 th November that officers have attempted to coordinate a response to the key relevant areas which we would have greatest interest in, from City and Neighbourhoods Department and Place & Economy.
3.6	A summary of feedback including specific page references within the Council response at Appendix 2 follows in the key issues section of this report:
3.7	<p><u>Key issues</u></p> <p>The breakdown of the comments from BCC within the draft Environment Strategy document is as follows:</p>

3.8	<p>Strategic Environmental Outcome 1 - Excellent air, water, land & neighbourhood quality</p> <p><u>Air quality</u> – new Air Quality Strategy for NI by 2022 (<i>Council's draft responses are included on pages 2-5 of Appendix 2</i>)</p> <p>Water Resources: Quality & Quantity - Implement the 'Living with Water in Belfast Plan'. Marine and Coastal Water Resources: Quality & Quantity.</p> <p><u>Sustainable Drainage & Wastewater Management</u> - Engagement with district councils to include SuDS (Sustainable Urban Drainage Systems) https://www.daera-ni.gov.uk/publications/managing-stormwater-strategy-promoting-use-sustainable-drainage-systems-within-northern in Local Development Plans (<i>page 6 App 2</i>).</p> <p><u>Neighbourhood Environment Quality</u> - Increase the maximum Fixed Penalty Notice for litter and dog fouling offences to £200 by 2023. Publish Northern Ireland's first Litter Strategy by 2024. Amend the Environmental Offences (Fixed Penalties) (Miscellaneous Provisions) Regulations (NI) 2012 to give Councils greater powers to vary fines by 2023. Include litter in Extended Producer Responsibility legislation (<i>pages 6-7 App 2</i>).</p> <p><u>Dilapidated Buildings & Neglected Sites</u> - Engage with Councils through Local Development Plans process to prioritise dereliction in plan strategies & policies. Develop a wide-ranging Dilapidation Bill. Introduce to the NI Assembly by 2023. New provisions to tackle low level dilapidation. Significantly enhance district councils' cost recovery powers. (<i>pages 7-12 App 2</i>).</p>
3.9	<p>Strategic Environmental Outcome 2 - Healthy & accessible environment & landscapes everyone can connect with & enjoy.</p> <p><u>Connecting People to the Environment: Landscapes, Seascapes & Natural Beauty</u> - Landscape policy/ legislation review (<i>page 13 App 2</i>).</p> <p><u>Connecting People to the Environment: Outdoor Recreation & Natural Space Provision</u> - Develop Community Path Network & Places Plans. Development of revised / new outdoor recreation legislation. Development of a new Strategy for Sport and Physical Activity for the</p>

	<p>next 10 years and beyond. Update Outdoor Recreation Action Plan for NI. Improve quantity, quality & accessibility of existing natural spaces, parks, recreational routes and marine & freshwaters. Expand off-road network of both local community paths and regionally significant NI wide routes (<i>page 13 App 2</i>).</p> <p>Environment Engagement Index (EEI) - The EEI is unique to NI and explores engagement and connection to nature through an annual survey.</p> <p><u><i>The Next Generation</i></u> – Eco schools (<i>page 13 App 2</i>).</p> <p><u><i>Sustainable Settlements</i></u> - Build and strengthen the resilience of our city by creating places where people want to live and work, to visit and invest. Develop and support sustainability and Green Growth. Work across Government to promote the Greenway network encouraging walking and cycling and reducing car dependency (<i>included in planning policy response pages 13-14 App 2</i>).</p>
3.10	<p>Strategic Environmental Outcome 3 - Thriving, resilient & connected nature and wildlife.</p> <p><u><i>Protecting Nature on Land</i></u> - 30% of land and water protected for nature by 2030. Increase NI woodland cover to 8.8% (122,000 hectares) by 2030 (<i>page 14 App 2</i>).</p>
3.11	<p>Strategic Environmental Outcome 4 - Sustainable production & consumption on land and at sea.</p> <p><u><i>Producer Responsibility</i></u> - By 2030: Increase recycling of packaging from 60% to 78%. From 2024, phase in new UK wide Extended Producer Responsibility Scheme for packaging. By end of 2024, 80% of full net costs of packaging contributed by producers. 2021/2: UK consultation on Review of Waste Electrical & Electronic Equipment. 2023: UK review of producer responsibility and increased recycling for End of Life Vehicles. 2022: review of producer responsibility for batteries (<i>pages 15-17 App 2</i>).</p> <p><u><i>Reducing Single-Use Plastic</i></u> (SUP) (<i>pages 17-18 App 2</i>).</p> <p><u><i>Carrier Bags</i></u> (<i>page 18 App 2</i>).</p>

	<p>Chemicals</p> <p>Environmental Regulation: Permitting - Digital transformation of application services for waste, water and pollution control authorisations. Digital transformation of site inspection forms for waste, water and pollution control regulatory staff. Publication of consultation on policy proposals for a new environmental permitting regime during 2022.</p> <p>Antimicrobial & Disinfectant Contamination.</p>
3.12	<p>Strategic Environmental Outcome 5 - Zero waste & highly developed circular economy.</p> <p><u>Circular Economy</u> - Publish Circular Economy Strategic Framework by 2022. Appoint members to a NI Circular Economy Coalition representing a diverse range of industries, sectors and interest. (page 19 App 2).</p> <p><u>Waste Management</u> - Publish new Waste Management Strategy by 2023. Introduce new UK wide Extended Producer Responsibility Scheme for packaging in 2023. Bring forward all actions set out in the Waste Prevention Plan 2019. By 2035, send no more than 10% of waste to landfill. (page 19-20 App 2).</p> <p><u>Illegal Waste Disposal & Fly-tipping</u> – Commence outstanding sections of 2011 Act. Secure agreement to the protocol of all 11 councils. DAERA and councils to review protocol annually. Consistent approach to data collection across NI regarding Fly-tipping and illegal waste disposal (pages 20 – 21 App 2).</p>
3.13	<p>We have also included within our response that the impact of the administration and application of any new changes for which District Councils would have a role need to be formally appraised and evaluated and further consulted on. The economic impact of the roll out of this future strategy would need to be determined to ensure there is no additional burden on the rate payers within the Belfast City Council area.</p>
3.14	<p><u>Next steps</u></p> <p>Members are asked to consider and agree the council response to DAERA attached at Appendix 2.</p>
	<p><u>Financial & Resource Implications</u></p>

3.15	None associated with this report. <u>Equality or Good Relations Implications/ Rural Needs Assessment</u>
3.16	None associated with this report.
4.0	Appendices – Documents Attached
	Appendix1: Draft Environment Strategy for Northern Ireland https://www.daera-ni.gov.uk/consultations/environment-strategy-consultation Appendix 2: Belfast City Council consultation response

Draft
Environment Strategy
for Northern Ireland



How can I get a copy of this document in another format?

You can get a copy of this document in other formats; including

- Paper Copy
- Large Print
- Braille
- Other languages

To find out more, you can:



- **Telephone:** 028 9056 9497 and talk to a member of the Team. If you have a hearing difficulty you can contact the Department via Text Relay. Dial 18001 028 9056 9497.



- **Email:** esni@daera-ni.gov.uk



- **Visit:** <https://consultations.nidirect.gov.uk>

About us

We are the Department of Agriculture, Environment and Rural Affairs.

What do we do?

Here are some of the things we do.



- We look after the development of farming, forests and fishing in Northern Ireland.
- We provide a service to look after the health and welfare of animals, fish and plants.
- We look after environment and rural development in Northern Ireland.
- We provide research, expert advice and education.
- We look after some parts of public health in how food is made.

The Environment

- The environment is very important to all of us - we are a part of nature too and clean air, good water and being able to use outdoor spaces can improve our lives.
- Many of the things that we do affect the environment in a bad way but there is a lot we can do to make it better.
- This is important because the environment supports our lives, businesses and jobs, communities, families and our health.
- This Environment Strategy for Northern Ireland is needed to improve our environment, improve people's health, and help to protect our planet.



Programme for Government

- The Programme for Government (PfG) is how the NI Executive (the Ministers of all the NI Departments) sets out what it wants to do.
- DAERA is responsible for PfG Outcome 2: “We live and work sustainably – protecting the environment”
- We are doing some things well – such as recycling waste from households – but other targets have been harder to achieve, like protecting nature and reducing our greenhouse gas emissions.



What does the strategy cover?

- The Environment Strategy will focus on results that will make a difference to the lives of people here.
- The Environment Strategy covers:
 1. Air and water quality
 2. A healthy environment we can enjoy
 3. Nature and wildlife
 4. Using our environment to make things without damaging it
 5. Waste and recycling
 6. Our changing climate

Green Growth

- ‘Green Growth’ is about how we aim to grow our economy in an environmentally friendly way. The Environment Strategy will support this.

Sustainability

- The United Nations have agreed ‘Sustainable Development Goals’.
- These goals are focused on improving people’s lives while protecting the world we live in.



- The Environment Strategy is linked to these goals.

Working Together

- Cooperating and working together is important when it comes to improving our environment.
- The strategy will also be our first 'Environmental Improvement Plan'. This is a plan to improve our natural environment and help us enjoy it.
- A new group called the 'Office for Environmental Protection' will check how well we're doing at improving our environment each year.

What Will We Do To Help?

- It is important that everyone plays their part in protecting our environment. Government departments will be doing their bit. For example, they will move to 100% renewable electricity, set up new hubs to reduce staff journeys and pollution, and encourage recycling.

Natural Environment

- Our natural environment supports life, is important to our economy, and improves the wellbeing of everyone.
- The land, air, water, plants and animals make up the natural environment. We are lucky in Northern Ireland to have such varied surroundings.
- There are threats to our natural environment and action needs to be taken to protect it.

Agriculture & Our Environment

- 'Nature Friendly Farming' will help protect our environment and grow our economy. This will be supported through new policy schemes.
- We want to have a sustainable agricultural-food industry with Northern Ireland setting an example. It will protect our environment, ensure our farm animals are properly looked after, and produce food for people to eat.

Outcomes: what we want to achieve

- We have 6 important outcomes:
 1. Excellent air, water, land and neighbourhood quality
 2. A healthy environment and landscapes we can enjoy
 3. Thriving nature and wildlife
 4. Production and consumption that doesn't damage our environment
 5. Zero waste and a circular economy
 6. Playing our part in reducing greenhouse gases while making changes to help us live with climate change
- There are different actions and targets for each outcome:

1



Excellent air, water, land and neighbourhood quality

- Set out a plan to improve our air quality
- Protect our seas to ensure they are clean and healthy, with less litter and pollution

- Improve the quality of our beaches, lakes and rivers
- Give councils new powers to deal with rundown buildings

2



A healthy environment and landscapes we can enjoy

- Protect our land and sea while encouraging everyone to enjoy and look after them
- Make it easier for people to access natural spaces like forests
- Encourage sport and exercise in the natural environment
- Promote outdoor learning opportunities
- Improve the environment in our villages, towns and cities
- Protect our historic environment such as monuments

Outcomes: what we want to achieve

3



Thriving nature and wildlife

- Protect and restore nature on land and at sea
- Protect our important peatlands and improve their condition
- Increase the amount of woodland by planting more trees
- Use a new approach that will help people making decisions that impact our environment take account of its full value

4



Production and consumption that doesn't damage our environment

- Develop new schemes that encourage farmers to protect our environment
- Produce even more of our electricity from renewable sources and make our homes more energy efficient
- Protect and improve our seas to ensure they are productive and fish sustainably

- Less single-use plastic
- Increase the cost of carrier bags
- Improve processes for managing pollution

5**Zero waste and a circular economy**

- Move to a circular economy where we reuse, repair and recycle as much as possible
- Reduce waste – including food waste
- Work with our local councils to stop people dumping their rubbish in our precious environment

6**Playing our part in reducing greenhouse gases while making changes to help us live with climate change**

- New laws requiring Northern Ireland to reduce the amount of greenhouse gases we produce
- Grow a green economy by helping people learn and train so they have the skills they need

Have Your Say

If you would like to say something about the new Environment Strategy just click on this link and answer the questions,

<https://consultations.nidirect.gov.uk>

For Help Contact Lisa: 028 9056 9497



If you have a hearing difficulty you can contact us using Text Relay: 18001 028 9056 9497



Or email esni@daera-ni.gov.uk and we'll email you a form to complete. We need to receive your views by 4pm Tuesday 18 January 2022



**Northern Ireland
Executive**

www.northernireland.gov.uk

APPENDIX 2

We have also included within our response that the impact of the administration and application of any new changes for which District Councils would have a role need to be formally appraised and evaluated and further consulted on. The economic impact of the roll out of this future strategy would need to be determined to ensure there is no additional burden on the rate payers within the Belfast City Council area.

Strategic Environmental Outcome 1 relates to Excellent air, water, land & neighbourhood quality

From the DAERA Draft Environment Strategy:

Engaging with people of all ages, communities, business, local and central government and the third sector will be crucial to the delivery and success of the Environment Strategy. This includes both physically engaging people with the natural and historic environment - through the provision of quality natural spaces and opportunities for outdoor recreation & learning - and engaging people and organisations with the processes al Outcome covers key elements of our environment including: air quality; water quality; land quality and local environment quality. For many people, these environmental issues represent their day-to-day experience of ‘the environment’ - from the air they breathe, to the quality of their drinking water and the condition of their local

Belfast City Council draft responses:

General comments

Firstly, it is noted that the draft document represents a “*high level strategy setting the Executive’s direction of travel*” and that there will be greater detail on specific actions and targets over time. This being the case, the Environment Strategy will, in effect, be an umbrella strategy, under which there will be more detailed/sectoral strategies, action plans and programmes. In this respect, it is noted that most of the draft action/targets at this stage are fairly generic and many relate to further strategies or policy review. Therefore our comments at this stage are in response the general direction of travel of the draft Strategy, insofar as that is stated or known, and we may provide further comments in future as more detailed action plans or strategies emerge.

In relation to land use planning, the draft Environment Strategy generally recognises the role of the district councils as planning authorities and it is noted that there are references to partnership working, including in relation to the preparation of Local Development Plans (LDPs) (Tables 4, 6 and 12). In this regard, the draft Environment Strategy should acknowledge that the 11 councils are at different stages in the LDP preparation process and for some councils the time for stakeholder engagement on the policy approach has long passed. Belfast City Council has produced its LDP draft Plan Strategy and, following an independent examination, the Planning Appeals Commission submitted its report of recommendations to DfI in September 2021. Therefore it is envisaged that the LDP Plan Strategy will be adopted early in 2022 and this will set the land use planning policy framework for Belfast City up to 2035, subject to periodic review as necessary or statutorily required. The stated commitment to be involved in the LDP process is welcome and, indeed, various government departments have participated in thematic working groups and other discussions in the development of our draft Plan Strategy. A positive working relationship is essential to ensure that the various strands of the draft Environment Strategy are delivered at all levels. Government departments will continue to have statutory responsibilities

and are consultees who will continue to participate in the working groups in the preparation of the Belfast Local Policies Plan when site specific proposals are developed, as well as any future review of the LDP.

There are some references to potential changes to legislation and regional planning policy/guidance (eg: Table 7 – Landscape/AoNBs; Table 8 – Open Space; Table 13 – Biodiversity). Again, whilst it is acknowledged that the regional context may change over time, it is important that planning authorities are properly involved in the process in order that any implications for LDPs and development management decision-making can be duly assessed and actioned as required.

Strategic Environmental Outcome 1 : 1 Air Quality

The UK Air Quality Strategy for England, Scotland Wales and Northern Ireland and Part III of the Environment (Northern Ireland) Order 2002 place a duty on Northern Ireland councils to periodically review and assess ambient air quality within their districts against a series of health-based objectives. In order to address the few remaining transport related nitrogen dioxide (NO₂) hotspots within our Air Quality Management Areas and to improve ambient air quality generally for the city, the council and our partner organisations have recently completed development of a new 5-year Belfast City Air Quality Action Plan (2021-2026).

In addition, DAERA is advised that the council is presently proactively undertaking a detail review and assessment for the city in order to quantify concentrations of fine particulate matter (PM_{2.5}) and to determine if mitigation measures will be necessary to achieve national and European standards as well as World Health Organisation (WHO) guideline values.

The council therefore welcomes that excellent ambient air quality has been identified as a strategic environmental outcome within the draft Environment Strategy and provides the following comments on the proposed actions and targets:

➤ **2022: Publish NI's first Clean Air Strategy and develop new SMART targets and actions.**

Belfast City Council welcomes the commitment by DAERA to the publication of a Clean Air Strategy specifically for Northern Ireland and refers the Department to the council's detailed consultation response, provided as part of the November 2020 Public Discussion into a Clean Air Strategy for Northern Ireland.

In addition, the council would again highlight to DAERA that at the People and Communities Committee meeting of 8th October 2019, the Committee agreed that recommendations regarding the adoption of WHO air quality standards and Clean Air Zone / Low Emission Zone legislation should be formally provided to DAERA and the Department for Infrastructure (DfI) as part of the council's consultation response to the forthcoming DAERA Air Quality Strategy for Northern Ireland.

The council notes that DAERA has proposed new SMART targets and actions as components of the Clean Air Strategy and would therefore recommend that the above matters be considered in the development of such Smart targets and actions.

➤ **Improve traffic data on which to base modelling and projections.**

Belfast City Council welcomes the proposed action to improve the collection of road traffic data on which to base modelling and projections.

It is considered that the availability of up to date road traffic data is critical in assisting the council to complete its various reviews and assessments of ambient air quality for the city and in the development of mitigation measures. Atmospheric dispersion modelling has increasingly become a more significant part of the local air quality management review and assessment process, alongside ambient monitoring, for deriving spatial and temporal projections of ambient air quality.

Unfortunately, due to a reduction in road traffic census points across Belfast and indeed Northern Ireland over recent years, the air quality impacts of some major roads across Belfast have had to be inferred on the basis of historical traffic counts and limited fleet composition data, dating from 2010. Moreover, due to the gradual introduction of a revised vehicular classification system, fleet composition assumptions typically have to be employed within air quality analyses. This lack of data makes it challenging for the council to draw accurate conclusions about the air quality impact of road transport sources, due to the historical and limited nature of the data. For clarity, Defra and the Devolved Administrations have published the Emissions Factors Toolkit (EFT) to assist local authorities in carrying out their various review and assessments of local air quality. The toolkit contains data to calculate road vehicle pollutant emission rates for NO_x, PM₁₀, PM_{2.5} and CO₂ for a specified year, road type, vehicle speed and vehicle fleet composition. The toolkit also includes data on both conventional and alternative vehicle types and fuels. It would greatly assist the council's various atmospheric dispersion modelling studies and reviews and assessments if future transport data for Belfast could be captured and collated on this basis.

The council would therefore encourage the Department to take into consideration the type of traffic data that is appropriate for ambient air quality dispersion modelling and reporting when progressing this action, to ensure that future fleet and traffic census data can be utilised by the Department for Infrastructure for roads engineering activities, as well as by DAERA and councils for local air quality management purposes.

➤ **Continue funding improvements in local air quality and explore further funding available.**

Belfast City Council welcomes the proposed action to *Continue funding improvements in local air quality and explore further funding available.*

It should be noted that the council's local air quality management work is presently supported through the DAERA LAQM Grant Scheme, as part of the wider Environment Fund, which assists the council in undertaking its various statutory local air quality management functions, including air quality monitoring, emission inventory work, dispersion modelling and fuel use surveys.

The council would advise however, that additional local air quality monitoring and detailed assessments, together with the development and implementation of associated mitigation measures may be necessary in coming years, particularly in the case of fine particulate matter (PM_{2.5}), if WHO guideline values are adopted as air quality standards for Northern Ireland and if the Department's proposed enhanced approach to air quality monitoring, as detailed within the November 2020 Clean Air Strategy for Northern Ireland Public Discussion Document, is implemented.

By way of a funding comparator, the council would highlight the Defra Air Quality Grant Scheme 2021-2022, which is available to local authorities in England. Defra has made at least £9 million in funding available to English local councils for projects to improve ambient air quality, public awareness and for projects that include measures to deal with particulate matter, which is currently the main pollutant of concern. Defra has advised that at least £1 million of the £9 million available this year will be dedicated to projects to improve public awareness in local communities about the risks of air

pollution. Local authorities are also able to bid for a portion of the fund for a wide range of other projects to improve ambient air quality and create cleaner and healthier environments. The criteria for this year's grant period prioritise the following three areas:

- Projects which reduce air pollutant exceedances, especially in those areas that are projected to remain in exceedance of the UK's legal targets;
- Projects that will improve knowledge and information about air quality and steps individuals can take to reduce their exposure to air pollution; and
- Projects that include measures to deal with particulate matter, which is the pollutant most harmful to human health.

The council would welcome the development and introduction of a similar grant scheme for Northern Ireland, to better support local air quality management projects, to raise public awareness of air quality matters and to improve ambient air quality.

➤ **Address ammonia emissions and their impacts through the forthcoming Ammonia Strategy.**

Whilst ammonia is not identified as a local air quality management pollutant, it nevertheless contributes to the formation of secondary particulate matter, which the council is currently assessing as part of the Detailed Assessment project for PM_{2.5}. Ammonia is also a cross-boundary pollutant, meaning that although there are no significant agricultural ammonia sources located within the city, agricultural activities from surrounding lands can nevertheless have an impact on particulate matter concentrations within the city boundary. Therefore, given the large scale and economic value of Northern Ireland's agriculture sector, it is vital that both ammonia and particulate matter are appropriately monitored and managed, whilst the agricultural sector continues to grow, to ensure that measures can be put in place when required, to reduce human health risks, as well as provide environmental safeguards.

Air Quality Expert Group (AQEG) and other air pollution reports have highlighted that reductions in agricultural emissions can have significant beneficial impacts on PM_{2.5} concentrations, which can in turn help to prevent mortality attributable to air pollution by up to 19% in Europe. Therefore, whilst the discussion around ammonia tends to focus principally on the ecological implications of the agriculture industry, it is essential that measures and actions put in place to mitigate impacts on the environment also provide protection for human health. The council therefore welcomes that the forthcoming Ammonia Strategy is included as an action within the draft Environment Strategy.

➤ **Develop improved monitoring and data collection to allow us to measure the impacts of energy decarbonisation policies on air quality.**

We note that although this action relates specifically to the measurement of impacts of energy decarbonisation policies on air quality, improvements to the ambient air quality monitoring network within Belfast and across Northern Ireland may be required in future if changes to pollutant objective concentrations are introduced via the Environment Act 2021 or through adoption of World Health Organisation guideline values.

As stated previously in this response, in addition to NO₂ reduction measures, fine particulate matter (PM_{2.5}) has recently emerged as an additional ambient air pollutant of concern for Belfast city.

Moreover, the recently introduced Environment Act 2021 (passed on 9th November 2021) includes specific targets on PM_{2.5}, which may eventually be implemented nationwide. These targets will likely have implications for local air quality monitoring network requirements.

The current Belfast air quality monitoring network has been developed over recent years to ensure those pollutants of concern, such as nitrogen dioxide, that are giving rise to exceedances within our Air Quality Management Areas are monitored at relevant receptor locations across the city. However, if more stringent or new thresholds, including for fine particulate PM_{2.5} are introduced over coming years, expansion of the current monitoring network will likely be necessary to ensure that monitoring is undertaken at relevant monitoring locations and that reductions in ambient air pollution are achieved, in accordance with objective concentrations. The council would therefore welcome improvements to the monitoring network in relation to fine particulate matter (PM_{2.5}), as well as for any other emerging pollutants of concern, which are identified in the future.

➤ **Fewer pollutants released by home heating systems.**

The council welcomes the Department's stated outcome of reducing pollution released by home heating systems, as recent evidence indicates that domestic combustion contributes more than previously thought to particulate matter emissions. It is anticipated that the council's Detailed Assessment project will provide a greater understanding of source apportionment for PM_{2.5} emissions from domestic and other emission sources within the city and may also provide data that can assist the Department in the determination of mitigation measures to help reduce home heating emissions.

The council additionally welcomes the forthcoming Energy Strategy (as highlighted within Section 17 of the draft Environment Strategy), which includes the principles of replacing fossil fuels with renewable energy and creating a flexible, resilient and integrated energy system. It is considered that the Energy Strategy will help to facilitate a reduction in emissions associated with home heating, thereby reducing ambient air pollution from domestic sources.

➤ **Increased public awareness of health effects of poor air quality and sources of pollution.**

During the recent 12-week public consultation on the new Belfast City Air Quality Action plan 2021-2026, the council noted that a range of respondents had recommended a greater number of local public awareness and educational campaigns should be provided in relation to ambient air quality, to include the provision of real-time pollution information and more information on the health effects of ambient air pollution.

The council therefore welcomes DAERA's commitment to a future vision or outcome of increased public awareness of the health effects of poor air quality and sources of pollution, as a consequence of the various air quality actions detailed within the draft Environment Strategy.

The council has already highlighted earlier in this consultation response that Defra has provided a £9 million fund for English local authorities to tackle air pollution during the 2021-2022 grant year and that at least £1 million of the £9 million available will be dedicated to projects to improve public awareness in local communities about the risks of air pollution. It is considered that DAERA should give consideration to the establishment and funding of a similar awareness raising campaign for ambient air quality within Northern Ireland.

Moreover, as part of the November 2020 Public Discussion into a Clean Air Strategy for Northern Ireland, DAERA proposed the establishment of an Air Quality Forum for Northern Ireland, which was intended to, among other things, oversee measures associated with improving the air quality indicator, as well as discussing any reforms coming from the review of air quality policy. The Department indicated at the time that the Forum would also be the ideal place to discuss, with stakeholders, the more effective communication of air quality impacts and the role that individuals can play in reducing air pollutant emissions.

The council provided detailed comments as part of its consultation response concerning the role and function of the proposed Air Quality Forum, together with recommendations for membership. It is considered that the Department should now give consideration to the formation of an Air Quality Forum for Northern Ireland in order to address the Environment Strategy stated vision of increased public awareness of the health effects of poor air quality and the sources of air pollution.

Strategic Environmental Outcome 1 : 4 Sustainable Drainage & Wastewater Management

The references (primarily Table 4) to sustainable drainage systems (SuDS) are welcome and are supported by the City Council. Indeed, our draft Plan Strategy includes a policy requiring SuDS measures in all new built development proposals, taking account of the multiple benefits in particular of soft-SuDS measures and the potential to add such measures to a wide range of development types and scales. Therefore, it is considered imperative that government projects also incorporate SuDS measures where appropriate – including to lead by example and showcase best practice across a range of capital projects. We are also preparing supplementary planning guidance to complement our SuDS policy and it will cover the general principles and typologies around SuDS. This aligns with our Green and Blue Infrastructure Plan (GBIP), which was adopted by the City Council early in 2020, following wide stakeholder engagement and public consultation. In this regard, the GBIP recognises the multiple benefits and roles of our green and blue infrastructure, including for climate resilience, environmental quality, biodiversity and human health & wellbeing. The GBIP also focusses on SuDS interventions and, in particular, soft SuDS measures and seeks to ensure that they are incorporated into new physical projects at all scales.

Continuing on the matter of SuDS, it is acknowledged that there has long been discussion around adoption and maintenance of proposals, as well as technical advice on their performance, including as part of planning application considerations. Again this is specifically mentioned in Table 4. It is our opinion that SuDS measures form part of surface water drainage and, whether hard or soft, the relevant statutory body should provide advice to planning, both at the pre-application/design stage and during the formal planning application consultation stage. In addition, any approval and inspection regime should also be within the role of the statutory drainage authority. This is consistent with the current approach to drainage matters and also takes account of the relatively small size of NI and the need not to provide and duplicate technical expertise in each of the 11 local authorities. Councils remain the planning authority and are the decision-maker for planning applications in most instances, with the benefit of technical advice from statutory consultees. In terms of maintenance, hard SuDS should continue to be adopted by NIW, unless the developer/owner agrees an alternative approach that is acceptable to NIW. This may also be the case with many soft SuDS measures, although it is acknowledged that many of these should simply be maintained as part of the building or landscape maintenance – which is normally the responsibility of the owner/occupier.

Strategic Environmental Outcome 1 : 5 Neighbourhood Environment Quality

1. Introduce a Deposit Return Scheme for Drinks Containers in 2024.

In principle the Council is supportive of this proposal, and has previously responded to the DAERA consultation on this. In addition, from a littering perspective, we highlight the following which the following points should be considered:

- Need to consider the scheme and how this will be implemented for example it may reduce litter on streets as there is a return on the bottle cost however may result in householders/commercial premises accumulating bottles on land to return in bulk which may have storage implications resulting in complaints.

- In some areas, it may encourage bin hoking activity with people searching through bins looking for bottles as a way to make money which again may result in decreased drink containers but increase in fly tipping/littering.
- Also, if there are to be reserve vending machines like in some of Scotland's proposals – where are these to be located, who regulates these and how well would they be regulated and managed – to avoid associated issues such as fly-tipping.

2. Increase the maximum Fixed Penalty Notice for litter and dog fouling offences to £200 by 2023

The Council welcomes the option to increase the maximum fixed penalty notices for litter to £200 however the Council would like the option to determine the maximum fine amount within a threshold between £100 and £200, so that a graduated approach to increasing the fine can be applied.

- Increasing the fine to £200 may act as a deterrent and prevent littering offences, however it's a steep jump from £80 to £200 for littering in relation to other fines associated with breaches of legislation/env. Crime). This may result in less fines being paid and therefore have an impact on administration and increased costs to prosecute for non-payment of fines with increased in legal and associated court costs.
- Increasing in the FPN amount to £200 will lead to increased administration as a result of disputes, as public will be less willing to pay a larger fine. This will impact on the resources required to administer the service.
- Fines in court upon conviction would need to be increased to ensure prosecution and outcome of court fines are beneficial and act as a deterrent.
- The early payment option of a reduced rate should be available within the legislation to encourage payment rates.

3. Publish Northern Ireland's first Litter Strategy by 2024.

The Council believes that a Litter Strategy would be beneficial to improve local environmental quality for all residents and communities. The Council looks forward to further engagement on the details of the Strategy to gain an understanding of how this could impact on time and resources required to implement the strategy.

The Council is interested to know what requirements will be placed on BCC and other Councils to implement the strategy? This element of the draft strategy should thus include funding and resources for local councils including education and awareness; from working with local communities and groups, schools and business so they can best address the local needs (as opposed all resources to NI wide campaigns) to wider scale advertising campaigns. What is vital is that the council can be responsive the local needs whilst being cognisant of the local authority needs. These relationships built on mutual understanding of the local community, business and environmental educational needs of the area and the bigger picture. It helps build connections with the local government organisation and lead into other areas and connections in the sphere of the environment. City issues, very different from the rural experience and needs to be a nuanced approach.

Continued grant support – Local knowledge of need, programmes and areas with potential, mean council involvement in this is vital.

Strategic Environmental Outcome 1 : 6 Dilapidated Buildings and Neglected Sites

In relation to point 6 within Strategic Environmental Outcome One (Dilapidated Buildings and Neglected Sites), Belfast City Council, through the Building Control Service had been in discussions

with the then DoE since 2012 and latterly with DAERA in 2016/17, about the key aspects of proposed new legislation to deal with dangerous and dilapidated buildings and neglected sites. We went as far as completing a detailed exercise in 2017 to calculate the estimated costs to the council of enforcing more effective legislation than that which we currently have at our disposal. The process was not progressed beyond 2017. We also provided a comprehensive response to the document *Environmental Legislation Dilapidated/Dangerous Buildings and Neglected Sites – a DoE Discussion Document* (responses to that consultation closed on 30 June 2014).

In Belfast we have two pieces of legislation which allow us to take enforcement against the owners of dangerous structures and dangerous places – Sections 116 & 117 of the Belfast Improvement Act of 1878 and Section 30 of the Public Health Acts Amendment Act of 1907 respectively. Through the 1911 Belfast Corporation Act, we can act in cases where the owner of the structure identified as enforceable under the 1878 Act is unknown or cannot be found. Frequently, dangerous structures are also dilapidated or ruinous.

We also use Article 66 of the Pollution Control and Local Government (Northern Ireland) Order 1978 in the case of dilapidated or ruinous buildings [66 (1)] or sites containing material resulting from demolition of a building [66 (2)] (not necessarily arising from a building on that particular site). This applies to situations where we contend that the state of the site due to either the presence of a ruinous building(s), or rubble, is seriously detrimental to the amenities of the neighbourhood.

These three (the 1911 Act effectively only being a postscript to the 1878 Act permitting enforcement in the case of an unknown owner) all have weaknesses which means that many cases of nuisance from ruinous/dangerous buildings/structures and neglected sites cannot be effectively (and cost-effectively) – or at all - remedied through the enforcement process.

In the case of the Belfast Improvement Act, the building owner is not fined when the case comes to court but ordered to make the building safe. If the owner fails to comply with the court order made, the council may legally step in and carry out the works to make safe in default of the owner. At that point only can the owner be fined (for failure to comply with a court order). Fines are not imposed at a level that provides a significant deterrent. Sections 118 & 120 -123 of the Act make provision for the council to recover costs incurred in carry out works in default, if necessary by selling the building or site, but we have had advice on this issue from counsel who was of the opinion that to sell a building or site in these circumstances would be in contravention of the Human Rights Act of 1998 (the First Protocol, Article 1 – Protection of Property).

The result of this is that the Belfast ratepayer funds the making safe of a building if the recovery of costs from the owner is unsuccessful. A charge can be made against the land, but this is no guarantee of recovery. In the case of the unknown owner, the council must obtain an order from the Magistrates' Court after presenting the relevant evidence, and then advertise the intention to carry out the works in three newspapers at significant expense. In this case, the costs fall once again to the ratepayer.

The council has a reasonably good record of successful enforcement using the 1878 Act but also, we have had repeated issues with the proving of ownership, and of incurring significant unrecovered costs of work carried out by the council in default.

Significantly, there is no provision in the 1878 Act for emergency works, whereby if for instance a structure is severely damaged by storm, fire, or sudden collapse and requires immediate action to safeguard the public, and the owner cannot be identified or contacted, the council has no vires to undertake any work to make the situation safe without first obtaining a court order. We have undertaken such emergency works from time to time after consulting with our Legal Services section, but in at least one case the building owner tried to claim compensation for the council's demolition of a not-salvageable, ruinous, dangerous building which was posing a very serious risk to public safety due to being on the brink of collapse and used as a play area by children.

The ability of the council to legally carry out works in default of the owner in an emergency, where the owner cannot be found or contacted would be very useful in any new piece of legislation.

Although there is a (protracted, and expensive in terms of advertising) mechanism for acting on a dangerous building with an unknown/unfounded owner - via the 1878 and 1911 Acts, the 1978 Pollution Control Order does not allow any action to be taken unless the owner can be identified and ownership proved by production of relevant documentation (e.g. Landweb documents). This is to a degree understandable, as legislation exists for dangerous buildings already, and ruinous or dilapidated buildings which are not dangerous (otherwise we would have used the 1878 Act), are not a risk to public safety - but they have a nuisance value in terms of aesthetics primarily, but also perhaps in terms of ASB, pests, damage to attached properties and so on. The other (than Belfast) councils, except for Derry and Strabane, have a more restrictive Act (Towns Improvement Clauses Act 1847) which requires the dangerous structure to pose a danger to by-passers or occupiers. Derry and Strabane Council has the Londonderry Corporation Act 1918, which is less restrictive than the Towns Improvement Clauses Act 1847.

The proportion of dilapidated and ruinous buildings for which it is not possible to prove ownership to the extent that it will satisfy a court is significant. The degree of dilapidation required to make the case that a building or structure is seriously detrimental to the amenities of the neighbourhood is high.

A case (Liverpool City Council – v- Derwent Holdings Ltd) that was heard in the Administrative Court in Liverpool in 2008 as an appeal to a decision made by the Crown Court found that a site on which rubble from a demolished public house had sat for four years was not seriously detrimental to the amenities of the neighbourhood, serves to illustrate this. The council claimed the site was in contravention of Section 79 of the 1984 Building Act but the appeal judges held that as it was in an area (Edge Lane) that was ‘ripe for development’ and that the condition of the site was that of ‘going through a usual stage of redevelopment’ and overturned the Crown Court decision. A judge in this case stated that ‘pleasantness’ is a reasonable simile for ‘amenity’ in the case of the terminology of the Building Act (the wording is the same as in our Pollution Control Order).

This means that councils in Northern Ireland, in order to act successfully under Art. 66 of the Pollution Control Order, must be able to provide enough evidence to contend that the building or structure is seriously detrimental to the amenities of the neighbourhood and must also prove ownership (and have a summons successfully served on the owner at his/her home address). Hence only the worst sites are acted on and action is impossible if ownership cannot be proved.

Even if the Art. 66 case gets to court, and is found in favour of the council, the judge can only impose a fine; he or she cannot order the owner to do the work required to address the dereliction (unlike the 1878 Act where an ‘order’ is made for the danger to be removed).

Once an owner is convicted under Art. 66 of the Pollution Control Order, the council may step in and carry out the required works in default; however, in practice it can be difficult to recover costs for a variety of reasons. The council understandably has a finite budget for these scenarios.

In the case of a piece of vacant land which is for example attracting ASB or an unsightly mothballed building site, the council can take no action. There is no law that requires a vacant piece of land to be secured. Similarly, with ‘mothballed’ building sites which might be dangerous to trespassing children, we have no powers to require them to be secured, or if unsightly, cleaned up.

In summary, what we would like to have is legislation which would allow the council to act on any type of building, structure or site within the city which is causing a problem. We would like much better cost recovery measures than exist currently, with the option of selling a building or site to recover costs where necessary. In the case of owners who have gone into administration or bankruptcy, we would like the council’s cost recovery to be prioritised over other persons/bodies who are owed money by the site/building owner. We would like to have the power to act immediately in an

emergency (danger) situation, and to have clear powers to recoup costs from the owner in such circumstances. We would like powers to deal with low-level dereliction such as vacant plots attracting ASB or other nuisance which are currently not covered by legislation – whether we are able to identify the owner or not (after all reasonable avenues of enquiry have been exhausted). Currently, we receive hundreds of complaints per year about problem derelict sites which fall outside the scope of the current legislation. These are the low-level-of-dereliction sites, which collectively have a seriously detrimental impact on the city, even if they do not do so individually.

For all cases of dereliction/danger/ nuisance from vacant buildings or neglected sites, the magistrate should have the power to order the owner to carry out the works, with fines for failure to comply of a level that provides a powerful deterrent.

There exists good legislation in the form of two acts already in force in England – the Building Act 1984, sections 76 – 79 & 121: and the Town and Country Planning Act 1990, sections 215-219. This could form the basis of new legislation but are not perfect – it is important that the good parts of the existing legislation in Northern Ireland are not discarded.

Tighter legislation on the registering of land would be helpful – many buildings/sites are not registered with Landweb and this proves problematic in establishing ownership.

Powers to serve notices on financial institutions, administrators and receivers would be of great benefit where relevant.

Non-prescriptive guidance written by the Department would be of benefit.

The council should have power to act in default of an unknown owner or a non-cooperating owner for all types of problem sites with excellent prospect of recovering costs, not just in the case of dangerous buildings.

Further to the point raised above about collaborating with councils in the LDP process, the draft Environment Strategy specifically references LDPs in relation to dilapidations and dereliction (Table 6). Whilst the statutory remit for derelict land and premises generally falls outside the scope of land use planning, it is accepted that the LDP can help identify locations for renewal and redevelopment. The existence of clusters of dereliction is a matter that will help inform our future approach to identifying potential Development Opportunity Areas in the new Local Policies Plan. It is also something that government departments and councils may wish to address by other means, including through capital projects and incentive programmes.

Vacancy Grant Programme

Council recognise dilapidated buildings can ruin the appearance of an area with negative impacts on business, property values, anti-social behaviour, tourism potential and civic pride. Council have carried out a vast intelligence and research exercise in relation to vacancy within the city centre, its impact on ASB, business, and the look and feel – vitality of the area.

Council commissioned a Retail Analysis report on Belfast City Centre which was undertaken by Pragma Consulting in 2019. This identified a number of challenges facing the city centre, with management and reduction of vacancy rates and dereliction as key themes. This work informed the development of the Future City Centre (FCC) Programme, which is aimed at the diversification of uses in the city centre with a focus on 6 interrelated pillars across Regeneration/Connectivity; Business/Employment; Vibrancy; Innovation/Digital; Positioning the City to Compete and Clean Green & Safe. ‘Re-Imagining the High Street & Addressing Vacancies’ is a key project within this overall FCC Programme. The FCC Programme recognises the complex nature of vacancy as an issue that is informed by a blend of global,

local, and individual factors, and can be both a cause and an effect of urban decay.

A Vacancy Toolkit has been developed that sets out a range of possible responses to different vacancy types, drawing on case studies but tailored to local circumstances. The toolkit comprises several forms of potential intervention, including a mix of Council-led or delivered projects (such as targeted acquisition of property) alongside a proposal for grant support to third parties. It is envisaged that a programme of measures will ultimately be necessary, with intervention at a number of levels, ranging from relatively low cost, high impact schemes to bring vibrancy and promote short term vacant space, through to larger scale physical improvements to enable reuse, to more strategic investment to reverse decline and promote diversification of uses within targeted properties as catalysts for wider regeneration. The measures proposed include physical and non-physical interventions and will require collaboration across a number of teams within Council to ensure alignment of existing and proposed initiatives, including across business support programmes and known space requirements within the cultural and creative sectors.

In terms of priority, in line with planning and regeneration policy and strategy regarding the primacy of the city centre, from the RDS, through the SPPS, and reflected in the Belfast Agenda and BCCRIS, a sequential approach is considered appropriate, with the Primary Retail Core the initial focus. Further areas of particular need have also been identified where vacancy and associated issues have taken hold e.g. arterial routes, and can be considered as work continues.

Research has shown that the cost of bringing vacant property into use and undertaking necessary upgrades/improvements and fitting out works is a clear barrier to occupiers taking up space. For property owners there is also often a viability issue in undertaking such works when measured against the likely rental return. Research into initiatives deployed by other cities/towns has also shown the importance of striking a balance between direct Council intervention and third-party support. While grant programmes delivered elsewhere have varied in purpose and scale depending on local circumstances, they have formed a central element of efforts to address vacancy. Lisburn and Castlereagh City Council and Armagh City, Banbridge & Craigavon Borough Council have both run grant programmes during the last 12 months, providing capital funding to support occupation of vacant premises.

Based on local evidence and data and informed by engagement with local property agents and other city stakeholders, Belfast City Council have developed a tailored grant programme combined with a wraparound business support service. The two year pilot programme will deliver a range of capital grants, business wrap around support and a matchmaking service. It is hoped the programme will close the viability gap for property owners to bring vacant and derelict properties back into use and incentivise the uptake of vacant space for local businesses and organisations. The pilot will be an opportunity to further our understanding of the vacancy picture and inform future investment decisions aimed at addressing the issue of vacant premises within the city.

The pilot scheme will support both external and internal improvements to buildings, expansions or repurposing of premises, and other associated set-up costs, and will support both property owners and occupiers to bring vacant space in the city centre back into use. In addition to supporting occupation of vacant premises and diversifying uses, external improvements to properties will help to activate street frontages, improving individual properties and streets, and generally contributing to streetscape quality and wider city centre vibrancy. Activation of the streetscape will act as one lever to help address issues of anti-social behaviour. There will also be direct and indirect economic benefits as a result of previously vacant space being occupied, including job creation and the diversification of uses with the potential to create opportunities in a range of sectors.

Based on evidence of need and potential impact, the scheme is operating as a pilot within the city centre boundary. Whilst this approach is being proposed for the city centre, bespoke proposals are also being brought forward for arterial routes / neighbourhood centres. The city centre pilot scheme is an opportunity for Council to gather additional intelligence (including via an Expression of Interest process) regarding issues faced by occupiers and property owners, which could then be used to inform the development of future targeted forms of support.

The nature and level of grant will serve as a stimulus, as opposed to a comprehensive funding package, supporting businesses/occupiers and property owners to bridge the apparent viability gap. While the grant would be conditional upon 10% match funding by the applicant, it is also expected that additional investment would be required by a property owner and/or occupier. The scheme will involve property owners or businesses/occupiers applying for a grant. Detailed eligibility criteria has been developed to ensure the scheme targets need and maximises impact, ensuring additionality in proposed schemes and avoiding displacement of existing businesses, e.g. grants would not be awarded to businesses closing an existing unit to open in alternative premises.

To support this work, a Vacancy Task and Finish Group has been established within Council comprising of officers from City Regeneration and Development, Economic Development, Local Development Plan, Building Control, Finance and Investment and City Innovation Team. The group recognise that high quality data is at the core of the Vacancy Programme, and work is ongoing to align multiple existing data sources (e.g. LDP survey info and LPS Valuation lists) within Council, and to explore the potential to add value through analytical tools such as the emerging 'Economic Analyser' tool which has the capacity to overlay multiple data sets related to city centre performance. The group will also provide oversight to the emerging pilot programme.

Strategic Environmental Outcome 2 - Healthy & accessible environment & landscapes everyone can connect with & enjoy.

From the DAERA Draft Environment Strategy:

There is no debating that fact that our environment is our single greatest asset. It is key to our well-being, both in an economic sense and in terms of our general physical, mental and social health - as individuals and as a society.

Engaging with people of all ages, communities, business, local and central government and the third sector will be crucial to the delivery and success of the Environment Strategy. This includes both physically engaging people with the natural and historic environment - through the provision of quality natural spaces and opportunities for outdoor recreation & learning - and engaging people and organisations with the processes and interventions that will improve our environment in the coming years and decades.

Belfast City Council draft responses:

Strategic Environmental Outcome 2 : 7, 8 & 10 Connecting People to the Environment, and The Next Generation

Covid has brought new ways of working. One area for us is changing our environmental education visits from classroom based to outdoor based. Environmental education delivered by the council has been vital to our council environmental strategy -250 visits the year prior to the pandemic. Improved funding for outdoor classroom activities led by local gov- using schools' outdoor space and council parks as the setting for a fuller and more rounded approach to environmental learning would be welcome. We as a council are at the early stages now, but this has potential and has garnered much positive feedback from schools. This approach also has lots of opportunities to evolve with the community sector and take advantage of shared green spaces and environmental awareness. Currently we provide the support year on year to every year group from nursery to 3rd level.

As a council we do our own school programming that complements eco-schools and enables schools to go deeper, focus on their areas of interest and link in locally which otherwise would be lost with the eco-schools programme. We have concerns around the eco-schools award schools lapsing once they have the flag, this is a live ongoing process and schools need supported through it which is something we do with annual visits.

Resources for local councils to respond to their local challenges and needs and to respond to the community's requests e.g. we had 138 clean-ups/ community activities the year prior to covid and even more requests so far this year. This not only has positive environmental impacts but further builds on community relations and inroads into meaningful engagement; it is really important the Council can resource this and build relationships in this way.

Strategic Environmental Outcome 2 : 11 Sustainable Settlements

Perhaps one of the key areas that planning can assist with is the creation of sustainable settlements (Table 11) and wider place-making measures. In this context, Table 11 appears to focus on specific interventions, such as town centre masterplans and greenway projects that may be led by government departments. Whilst it is not disputed that there are many interests involved in the creation of sustainable settlements, it is suggested that the role of councils generally, and LDPs specifically, should be clearly referenced in this section. In addition, whilst the key issues mentioned are of significant importance, perhaps there is also a wider, more strategic, aspect that should be acknowledged here – the focussing of all new development at sustainable and accessible locations within existing settlements and avoiding sporadic/dispersed development. This is a region-wide issue and is clearly connected to all three pillars of sustainable development and the creation of places where people want to live, work, visit and invest.

Strategic Environmental Outcome 3 - Thriving, resilient & connected nature and wildlife.

From the DAERA Draft Environment Strategy:

We are an integral part of nature, and reliant on nature to sustain life. We can positively impact nature as we engage with it, protecting, maintaining and enhancing a clean and healthy environment as we live, work and play. However we can also cause harm to the environment, and this negative engagement is increasingly causing impacts to health, well-being and future sustainability.

Belfast City Council draft responses:

Strategic Environmental Outcome 3 : 13 Protecting Nature on Land

Currently the Council only has remit in terms of Local Nature Reserves and SLNCIs as identified within the LDP. This target is especially difficult within an Urban context given existing pressures and competing interests and demands in terms of land use and ecosystem services such as flood attenuation and carbon storage all from a finite land resource.

BCC would welcome the opportunity to work with the Department to investigate opportunities, constraints and mechanisms in how the 30x30 target may be achievable equitably, especially within an urbanised Council Area.

Strategic Environmental Outcome 4 - Sustainable production & consumption on land and at sea.

From the DAERA Draft Environment Strategy:

Sustainable production & consumption involves the production and use of products and services in a manner that is environmentally benign, socially beneficial and economically viable over their whole life cycle. Key to this is ‘resource efficiency’, commonly defined as using the Earth’s limited resources in a sustainable manner while minimising impacts on the environment. This is something that applies across all sectors - including industry, agriculture and energy.

Belfast City Council draft responses:

Strategic Environmental Outcome 4 : 19 Producer Responsibility

The Council notes and welcomes the Department’s proposed action to develop the policy, subordinate legislation and guidance required for a new environmental permitting regime for Northern Ireland governing pollution prevention and control, and associated legislation on powers of entry. The council also notes and welcomes the Department’s proposed action to publish a consultation on policy proposals for a new environmental permitting regime during 2022. The Department is encouraged to consider whether the provisions of the new environmental permitting regime should encompass enforcement of the Fluorinated Greenhouse Gases and Ozone Depleting Substances Regulations.

The Council welcomes the Department’s future vision for integration of environmental protection and economic growth in NI as the regulatory burden for responsible and compliant operators is reduced; the replacement of the current systems for authorising and regulating a number of environmental activities with a single standardised, more streamlined and less bureaucratic regime; higher levels of protection for the environment and; the introduction of a risk-based regulatory system that will help responsible businesses operate effectively within environmental limits.

The Council is broadly supportive of the proposals under Producer Responsibility and note that they represent an opportunity in progressing the development of a Circular Economy. (linking in with Strategic Environmental Outcome 5 - Zero waste & highly developed circular economy). Placing cost burdens on producers of waste materials should hopefully, in time, help to reduce the overall financial burden placed on councils in collecting and managing such wastes. Existing producer responsibility schemes do not necessarily support the principles of producers paying for the full costs, nor that the benefits should be spread across all stakeholders in the supply chain. Any reviews and new proposals of such schemes should be clearly focused on addressing this shortfall to ensure that it is fairer for all stakeholders.

Awareness raising to be resourced to allow ‘producer responsibility’ actions to be addressed to businesses, resources for council workshops, info sessions, advertising campaigns etc.

Awareness raising to allow consumers to make informed choices and understand the repercussions of single use plastics and impact on the environment and their pockets via rates.

The Department will be aware that local councils enforce the Pollution Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013 as they apply to Part C installations; i.e. those industrial installations that emit only to air. The main framework for this system of air pollution control centres on the requirements of Regulation 9, i.e. that no person shall operate an installation or mobile plant, after the prescribed date detailed within the Regulations, except under and to the extent authorised by a permit granted by the enforcing authority. The extent and nature of the activities, installations and mobile plant permitted are detailed within Schedule 1 of the Regulations. The Pollution Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013 were amended in February 2018 to transpose the requirements of the Medium Combustion Plant (MCP) Directive on the limitation of emissions of certain pollutants into the air from medium combustion plants.

To date, permits and associated documentation have been issued to operators by district councils predominantly in paper format, with paper-based copies maintained within each council area in the form of a public register. The public register also includes details of Part A and Part B installations for that council area that are subject to integrated pollution prevention and control by the Northern Ireland Environment Agency.

It is now noted that DAERA has proposed a digital transformation of application services and site inspection forms for pollution control authorisations and pollution control regulatory staff. Whilst the council would welcome the digital transformation of application and site inspection forms as they apply to Part C industrial processes, and medium combustion plant, the council would highlight that the now withdrawn European Commission Services Directive placed a duty on the council in respect of licence applications for businesses and to that end, the council already provides an online application process for Part C permit applications via its website.

It should however be noted that in respect of Part C industrial permitting, the capacity to apply online only for a permit is not always practical or desirable from a customer services and regulatory perspective, as in many instances, the council's Industrial Pollution Control Officer will wish to carry out a pre-application visit to understand the nature and extent of the industrial process to be permitted and to guide the operator, prior to submitting an application. This can, for example, involve meeting with an operator on site and going through in detail the relevant process guidance note, model permit and application form, etc.

The council would therefore welcome engagement with the Department at the appropriate juncture concerning the manner of the digital transformation of application services and site inspection forms for Part C pollution control authorisations. The council would however highlight that as a consequence of the Covid 19 pandemic, it has already been required to issue and receive some site inspection forms in a digital format in order to maintain inspection and regulatory functions during periods of lockdown.

The council would note that the proposed digital transformations may more closely align Northern Ireland industrial permitting activities to those of the Environmental Permitting Regulations, already implemented other parts of the United Kingdom, and which have been subsequently amended to apply the requirements of the Industrial Emissions and Medium Combustion Plant Directives. In such a situation, the Department is encouraged to engage with councils concerning the anticipated enlarged scope of Environmental Permitting Regulations.

The council recommends that the Department supports the delivery of these outcomes through the provision of appropriate financial, digital and other necessary resources to support the proposed regulatory transformation programme for Northern Ireland.

Include litter in Extended Producer Responsibility legislation.

- If producers are to take account of litter and assist with associated costs this may reduce packaging that ends up as litter and costs associated with cleansing whilst also impacting on the number of fines to be issued.
- However if there is to be monitoring of litter or worst offenders/producers who would do this monitoring, how would it be completed/recorded and who has oversight? This will have associated cost and time burdens whilst not making and impact/reduction in fly tipping.
- If producers are paying more , how will this impact on Councils? Would funding be used for street cleaning, educational campaigns community clean ups etc? Some litter eg chewing gum is very time consuming to remove from street surfaces and funds should be diverted from the producer to Councils to resource its removal.

It is noted that Belfast City Council responded to consultations on EPR and DRS in June 2021. It is anticipated that the views and comments raised by Belfast City Council in these consultation responses are recognised and considered in the development of these producer responsibility schemes.

Council recognises that Extended Producer Responsibility offers producers an incentive to make better, more sustainable decisions at the product design stage including decisions that make it easier for products to be re-used or recycled at their end of life. It also places the financial cost of managing products once they reach end of life on producers. Additionally, the proposals for a DRS (for drinks containers as outlined in the DAERA consultation) could help shape a scheme that incentivises consumers to change their behaviour, leading to higher recycling rates and lower levels of littering.

In terms of reduced littering, we would highlight that, for local councils, there would not necessarily be a cost saving related to operational aspects of litter collection (e.g. terms of manual sweeping and picking and emptying bins), as staff will be required to cover the same area to litter pick and bins will probably have to be emptied with the same frequency.

We note that timelines highlighted seem very ambitious, and will need to take into account the lead-in times required by each proposed schemes' participants. Also, in terms of sequencing, with the EPR and DRS in particular, if the EPR is delayed, then is it assumed that this will have a knock-on effect on the introduction of any DRS? Council suggested, in its response to the EPR and DRS consultations, that the introduction of a DRS could be deferred until the EPR policies have been implemented and the outcome of the plastics tax is better known. This would allow these policies and regulations to work and see if they deliver the desired increases in recycling before determining whether a DRS is needed.

The introduction of any new Producer Responsibility Scheme could have considerable financial implications upon implementation. The impacts for local councils will need to be clearly defined and recoverable in terms of net impact on ratepayers.

Strategic Environmental Outcome 4 : 20 Reducing Single-Use Plastic (SUP)

This section is somewhat vague, in terms of content, timelines and links to relevant legislation. We note that there is an absence of dates within the actions and targets section, even though DAERA is currently consulting on the reduction of single use plastic beverage and food containers. Provision of even rough timescales of when e.g. a Consumption Reduction Plan, targets for SUP cups & containers, clearer labelling etc. is expected would be welcomed within this Environment Strategy. The link between actions, targets and vision is fairly tenuous and more provision of more detail and how they connect is recommended.

With regards to the three visions:

1. Suppliers to look for sustainable alternatives to single-use plastic products.
2. Consumers to refuse single-use plastic, demand refill options and reuse plastic items. If these options are not feasible then consumers to recycle their plastic.
3. Reduce the use of single use plastic cups and food containers.

Visions: 1 and 3 line up. However, with regards to vision 2, there is no action outlined of how this could potentially be achieved. Vision 3 could go one step further and commit to “reducing the *production* of SUP”, not just their use.

Strategic Environmental Outcome 4 : 21 Carrier Bags

Whilst the carrier bag levy has been successful in reducing the number of single use bags being sold, it is also recognised that the levy has resulted in some unintended consequences. For example, the in the production and sale of large numbers of heavy duty bags (such as “Bags for Life”) many of which end up in landfill, as well as becoming a litter nuisance in our natural, built and marine environments, causing pollution and long term damage to wildlife and the Environment.

We would highlight that whilst the new proposals should encourage more bag re-use and less reliance on the purchase of new bags, it should not end up as disproportionately impacting low-income families and individuals.

The actions outlined in the strategy could perhaps demonstrate more rationale as to how any why the targets have been set. Likewise, within the Future Vision “The levy and its outcomes are key targets in delivering sustainable waste management across NI”, a clearer link of how the levy relates to sustainable waste management could be provided.

Strategic Environmental Outcome 5 - Zero waste & highly developed circular economy

From the DAERA Draft Environment Strategy:

The Circular Economy is an economic system which reduces overall demand for resources, retains the value of resources and seeks to regenerate our natural ecosystems. By designing things differently, we can reduce overall demand for raw materials, reduce waste generation and create things that retain value throughout their entire life cycle. By keeping technical and natural materials in circulation for longer at their highest value we retain their embodied carbon and can increase nature's ability to sequester carbon.

A circular economy is fuelled by renewable energy and while the decarbonisation of the energy sector is a necessary part of achieving net zero, the circular economy is an equally essential element because by its application we create more sustainable production and consumption patterns which are needed to tackle resource scarcity, inequality and waste generation.

The circulation of natural materials can create new bio-economy enterprises and will help regenerate natural systems. In a Circular Economy system we create places where people have greater access to products, businesses thrive by becoming more resource efficient and we improve the health of natural ecosystems.

Belfast City Council draft responses:

Strategic Environmental Outcome 5 : 25 Circular Economy

Council welcomes the development and publication of a Circular Economy Strategic Framework and the timeframe for this. We hope that this document will have tangible actions and be supported by an adequate funding package to deliver on its outcomes (ie. Research, engagement and outreach mechanisms with businesses to encourage proactive thinking around this must be properly resourced). We also suggest that actions emanating from the framework are subject to annual progress reports. We trust that the establishment of the NI Circular Economy Coalition will have representation from local government and engage with Local Authorities which can assist in creating a more circular future.

With regards to the Future Vision “It will inform upcoming environmental, economic and social policy development, raise awareness within the private and public sectors as well as the third sector of what a Circular Economy (CE) is and will identify where opportunities exist to create a more circular NI economy” we would add in “benefits and” to read:

It will inform upcoming environmental, economic and social policy development, raise awareness within the private and public sectors as well as the third sector of what a Circular Economy (CE) is and will identify where **benefits and** opportunities exist to create a more circular NI economy.

Strategic Environmental Outcome 5 : 26 Waste Management

We would encourage DAERA to make best endeavours to expedite the new Waste Management Strategy to drive the policy context and to assist Local Authorities in developing their Waste Plans. The delivery of these plans are likely to require significant funding and in that respect we would request that DAERA clarifies the position and provides sufficient funding in respect of the Household Waste Recycling Collaboration Change Fund.

With regard to the Waste Prevention it would be advantageous for DAERA to provide a review of the plan and refresh the plan as required with any carry-over actions or indeed new actions. The plan must be properly resourced and Council involvement is absolutely key to respond to issues particular to that council area. On a positive note the establishment of the NI Resources Network is welcome and we would foresee a potentially greater role for this body to deliver on waste prevention and the circular economy actions.

We note the potential difficulty with measuring waste prevention. And the need to look beyond weight-based targets – perhaps more appropriate targets would be ones based around patterns of consumption of waste.

We note that two dates are quoted for the Waste Prevention Plan: 2019 and 2020

We reiterate our point on the ambitious timeframes outlined and also the importance of sequencing of the EPR and DRS: if the EPR is delayed, then is it assumed that this will have a knock-on effect on the introduction of any DRS? Council suggested, in its response to the EPR and DRS consultations, that the introduction of a DRS could be deferred until the EPR policies have been implemented and the outcome of the plastics tax is better known. This would allow these policies and regulations to work and see if they deliver the desired increases in recycling before determining whether a DRS is needed.

With regards to food waste, we would highlight the linkage of this Environment Strategy to the Food strategy Framework for Northern Ireland.

Strategic Environmental Outcome 5 : 27 Illegal Waste Disposal & Fly-tipping

The Council notes that the commencement of Article 4&5 of the Waste and Contaminate Land Amendment Act (NI) 2011 has been postponed pending an assessment of the resource requirements expected to be employed by a council in utilising the additional enforcement powers available. The Council welcomes this development as the proposal to give Councils powers under Article 4&5 of the Waste & Contaminated Land (NI) Order 1997 was initially considered in 2010/11 and since this time lapse, resourcing new powers is ever more challenging with many other competing priorities.

The introduction of dual responsibilities between the Councils and the NIEA requires a partnership working arrangement to ensure that the function is managed with clear lines of responsibility and that there is a demarcation of roles between the two enforcement bodies. In advance of commencing the legislation, the Department has developed a “Fly-Tipping Protocol” which sets the operational framework between the NIEA and the councils regarding enforcement roles. The Council believes that the protocol could be further developed to ensure that the demarcation of roles in relation to the use of Article 5 powers is clearly defined. This would give the Council more assurance in moving forward with a partnership approach where both parties are clear on the use of the new powers. Notwithstanding the assessment of the cost impact, the Council believes that the implementation of the new powers will require additional resources and cost to implement the new powers.

The aspiration to have a collective data capture approach will bring additional costs and will require resources to collect, collate and review data to meet protocol requirements around data capture. Councils use different IT systems to manage their data and the use of one uniform system will require funding from DAERA to develop and implement.

This page is intentionally left blank



Subject:	Belfast City Airport Request – Bird Strike Management at Victoria Park: Implications to Air Safety
Date:	7 th December 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Stephen Leonard, Neighbourhood Services Manager (South)

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	<p>The purpose of the report is for Members to consider a request from The George Best Belfast City Airport (GBBCA) to</p> <ul style="list-style-type: none"> gain access to Victoria Park to continue habitat modifications to mitigate the risk of bird strike; and extend the existing annual licence agreement to carry out pricking of greylag geese eggs from end of May to the end of June.
1.2	This is part of an ongoing control programme in line with their Wildlife Hazzard Assessment and the Civil Aviation Authority licensing requirements.

2.0	Recommendations
2.1	<p>Members are asked to agree to the request from George Best Belfast City Airport to grant them access under licence to Victoria Park to facilitate;</p> <ol style="list-style-type: none"> 1. The removal of old rook nests by Mid-January 2022; 2. Any necessary thinning of sheltering pines, structural pruning of preferred nesting trees, and reducing shelter from ivy; 3. Extension of the annual BCC licence for egg pricking of greylag goose eggs to the end of June to align with the DAERA, NIEA licence.
2.2	<p>Members are advised that any decision to grant this permission is subject to legal agreement that would be developed by the Councils Legal Services Department and will include a requirement to ensure that any works are permissible and the required NIEA licence and consents are in place.</p>
2.3	<p>Any licence would be progressed under the Directors delegated authority, taking into consideration Members views.</p>
3.0	Main report
	<u>Key Issues</u>
3.1	<p>Members should be aware that control of birds in the flight path to the airport is a requirement of the airport's Civil Aviation Authority licence. In line with GBBCA's national aerodrome license requirements and associated guidance material presented in CAP772: Wildlife Hazard Management at Aerodromes, the airport are required to identify sources of risk and to reduce and maintain risk to an acceptable level in compliance with the Civil Aviation Authority licensing requirements.</p>
	<u>Rooks</u>
3.2	<p>Members are reminded that in January 2021 the airport removed 12 old rook nests and undertook structural pruning of trees and ivy at Victoria Park. These works were completed due to the recent establishment of a rookery at Victoria Park with an increased frequency of rook occurrence around the airport.</p>
3.3	<p>Following the works rook nests and total rook numbers were monitored from 28th February to 15th April 2021. Nest building was lowered by 35% with reductions in both average flock size, down from 27 to 14, and the maximum flock size from 30 to 17.</p>

3.4	As suitable nesting habitat is prevalent throughout the park, the airport remains concerned there is potential for this rookery to re-establish and expand unless further habitat modifications are implemented.
3.5	GBBCA are seeking to carry out continued remedial actions which would involve the removal of old nests – outside of the breeding season – and selective pruning of branching forks and other potential anchor points in trees to further inhibit nest building attempts in 2022. Appendix ,1 GBBCA Report provides more detailed supporting information.
3.6	In addition, the airport wish to remove circa 4 pines along the eastern edge of the rookery and reduce the shelter provided to nesting trees behind. Permission to remove these pines was granted in the last licence but not actioned then. GBBCA also wish to continue to reduce shelter provided by ivy, if required.
3.7	GBBCA will appoint a suitable contractor with previous experience to undertake the work.
3.8	<p>If members are content, officers will review the submitted risk assessment and insurance certificates in line with procedure and work with Legal Services to issue the requested licence. The licence will include relevant conditions to ensure that the airport confirm that all works is permissible and any required licences are in place to allow work to take place within the required timescales. The licence will also place an onus on the airport to ensure that health and safety measures are implemented, essential signage is assembled, one-way systems are established where necessary, and any COVID specific mitigations are in place.</p> <p><u>Greylag Geese</u></p>
3.9	<p>In 2021 GBBCA recorded a goose laying and hatching a clutch of eggs in June. The current annual greylag goose Licence Agreement between BCC and GBBCA extends to the end of May and the airport are requesting this be extended to the end of June to address any future late laying. This will align the BCC legal agreement with the DAERA, NIEA licence.</p> <p><u>Financial & Resource Implications</u></p>
3.10	GBBCA will be responsible for any costs associated with the request.

3.11	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> None
4.0	Appendices – Documents Attached
	Appendix 1: George Best, Belfast City Airport Report – Management Recommendations Victoria Park 2021 – prior to 2022 Breeding Season.

Management Recommendations Victoria Park 2021

– prior to 2022 Breeding Season

Report to Belfast City Airport

KerryMackie 20/9/21

Rookery



Development of a Rookery at Victoria Park 2020

The removal of rook nests and associated canopy pruning was undertaken on January 29th 2021 under a temporary BCC license and by professional tree climbers subcontracted directly by Belfast City Airport. 12 remnant rook nests were removed while all trees perceived to have nesting potential were modified by the selective removal of stem/branch unions. A sample of nesting positions were photographed before and after treatment for reference and to later assess efficacy when comparisons are possible later in the of Autumn 2021 (Figs 1a & 1b). An element of ivy control was also exercised to reduce sheltering to 2021 nest locations (Figs 2a & 2b).

Canopy lifting and pruning 29th January 2021



Fig 1a. Before ...



Fig.1b. After treatment



Fig 2a. Ivy growth and rook nest location (pine)



Fig 2b. Ivy providing additional shelter was controlled by cutting stems.

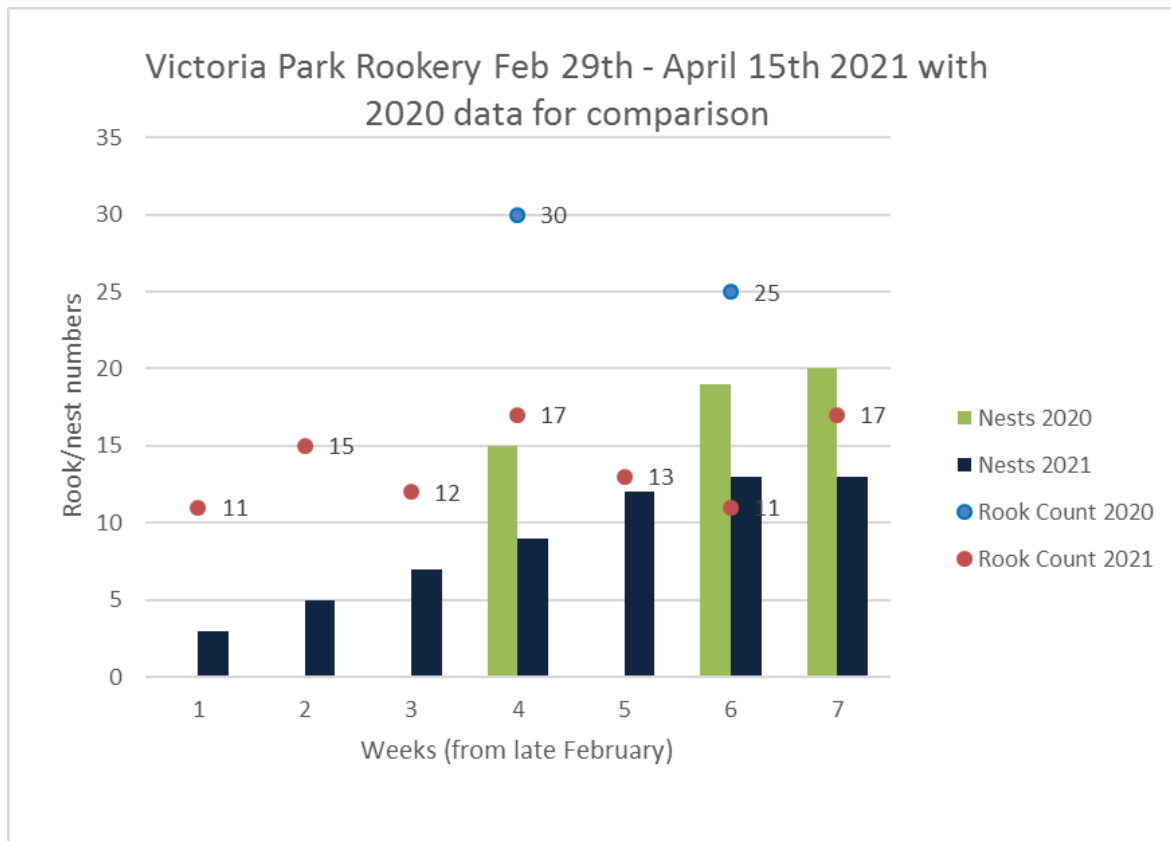


Fig. 3.

Outcome

Rook nests and total rook numbers were monitored from 28th February to 15th April 2021 (Fig. 3). The number of nests built was lower in 2021 by 7 nests (35%), with average flock sizes of 27 (n=2 in 2019) reduced to 14.0 (n=7) and maximum flock size down from 30 to 17. This level of adjustment recorded during the time interval of the first licence period averted the need to pursue more intensive management prescriptions, an option allowed for under part 2 of the temporary licence.

Short term requirements

Belfast City Airport must continue its efforts to minimise the risk of air strikes from rooks at this colony. An additional concern for 2022 is the recruitment into the colony of 2019's natal progeny as it reaches breeding maturity. The airport therefore needs to once again remove nests and reduce the appeal of this plantation still further.

Outline of rook management prior to 2022 breeding season

Ideal window for management : November/December 2021.

Time required : 1-2 days

- Removal of old rook nests and selective pruning of branching forks and other potential anchor points (as previously licenced Jan/Feb 2021), to further inhibit nest building attempts for the 2022 breeding season. An early move ahead of next season is advisable to guide where pruning is necessary, prior to any nests being removed by winter storms.
- Thin (remove) alternate/specific pines (c. 4) - after agreement with park staff - along the south eastern edge of the rookery and reduce the shelter provided to nesting trees behind. Although remaining pines will benefit from extra light at this locality, further thinning/canopy lifting might ultimately be required if rooks continue to nest at this site. Permission to remove pines was granted in the first licence but not exercised at the time with nest removal and pruning receiving priority.
- Continue to reduce shelter provided by Ivy if required.

Additional management prescriptions as described in greylag management report 2021

Due to the incidence in 2021 of a goose laying and hatching a clutch of eggs after the period of licensed management, any subsequent licence period will need to be reviewed and extended to cover the month of June.

In addition, the practicalities to effect egg control on one particular goose nest has proved challenging due to its position 4-5 metres high in a pine tree (see figs 4a & 4b). The Airport would like to reduce branching whereby this tree becomes unusable by geese/or herons but still retains form when viewed from the main path along the southeast edge of the lake.



Fig. 4a Location of pine tree on main island.



Fig. 4b Goose nest

This page is intentionally left blank



Subject:	New Biodiversity Strategy for Northern Ireland – Pre Consultation Input
Date:	7 th December 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Orla Maguire, Biodiversity Officer

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	The purpose of the report is for Members to consider a pre consultation response to contribute to the development of the new Northern Ireland Biodiversity Strategy.
2.0	Recommendations
2.1	<p>The Committee is asked to</p> <ul style="list-style-type: none"> Agree the draft pre consultation response and to note that there will be further opportunity to comment on the new NI Biodiversity Strategy at full consultation stage. Subject to Committee and Council Approval this response will be submitted to DAERA. The Department has not given an indicative date when the Strategy will be issued for consultation but officers will keep Members updated.
3.0	Main report
	<u>Key Issues</u>
3.1	The previous Northern Ireland Biodiversity Strategy to 2020 has now elapsed, and the Executive intends to develop a new Biodiversity Strategy to meet the challenges faced by the natural environment.

3.2	The scientific evidence points to an on-going decline in global biodiversity; with that trend very much mirrored in Northern Ireland. Internationally the United Nations, through the Convention on Biological Diversity (CBD), is refocusing its intention on reducing the loss of biodiversity through a Global Biodiversity Framework.
3.3	In July 2021 the CBD published the first official draft of a new Global Biodiversity Framework to guide actions worldwide to preserve and protect nature and its essential services to people. Work is ongoing but it is likely that the framework will include the 21 strategic targets set out at Appendix 1
3.4	<p>The framework includes targets for 2030 including:</p> <ul style="list-style-type: none"> • All land and sea areas globally are under integrated biodiversity-inclusive spatial planning addressing land- and sea-use change (Target 1). • At least 30% of global land and sea areas are conserved through effective protected areas and other effective area-based conservation measures (Target 3) • At least 50% reduction in the rate of introduction of invasive alien species, and controls or eradication of such species to eliminate or reduce their impacts (Target 6) • Reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds, and eliminating the discharge of plastic waste (Target 7) • Nature-based contributions to global climate change mitigation efforts of least 10 GtCO₂e per year, and that all mitigation and adaptation efforts avoid negative impacts on biodiversity (Target 8) • Increase the area of, access to, and benefits from green and blue spaces, for human health and well-being in urban areas and other densely populated areas (Target 12) • Integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy (Target 14). • Redirecting, repurposing, reforming or eliminating incentives harmful for biodiversity, reducing them by at least \$US 500 billion per year (Target 18).
3.5	The CBD intends to get international agreement to the framework at the Council of the Parties meeting (CoP15) in May 2022 in China. The targets agreed at this summit will replace the 2020 biodiversity targets, many of which were not met.
3.6	In the meantime the four UK countries are refreshing their strategies, based on the draft framework. To assist with development of the new strategy DAERA has requested Council input and comment specifically in relation to strategic targets; 1, 3,6,12, and 14.

3.7	<p>A draft response has been prepared at Appendix 2 but principal comments include the need for;</p> <ol style="list-style-type: none"> 1. Robust Legislation and policies. 2. Baseline data – the dearth of ecological data across most habitats and taxa prevents informed decision making and monitoring of trends especially at a local level due. 3. Cessation of incentives which are damaging the natural environment. 4. Adequate resources – Lack of investment on invasive alien species are currently estimated to cost £1.8 bn to the UK economy. 5. Resources - There is a significant professional skills gap recognised by the sector. 6. The new NI Biodiversity Strategy needs to SMART Targets with interim milestones, monitoring and be adequately resourced. Funding should be accessible to environmental organisations and Local Authorities. 7. Mainstreaming Biodiversity - Collaboration across all sectors is required to deliver the outcomes. 8. Reinstatement of Local Structures for example the NI Biodiversity Group and the Habitat and Species Action Plan Groups which brought together Government, eNGOs and the business sectors.
3.8	<p>Subject to Committee and Council Approval this response will be submitted to DAERA. The Department has not given an indicative date when the Strategy will be issued for consultation but officers will keep Members updated.</p> <p><u>Financial & Resource Implications</u></p>
3.9	<p>There are currently no financial implications.</p> <p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p>
3.10	<p>There are currently no equality or good relations implications.</p>
4.0	Appendices – Documents Attached
	<p>Appendix 1: Global Biodiversity Framework – Proposed Targets.</p> <p>Appendix 2: Draft BCC pre Consultation Response to new NI Biodiversity Strategy</p>

This page is intentionally left blank

Appendix 1 – Global Biodiversity Framework – Strategic Targets

This framework has been developed internationally with DEFRA representing the UK. Work is ongoing but it is likely that the framework will include the 21 strategic targets set out below.

Reducing threats to biodiversity

Target 1. Ensure that all land and sea areas globally are under integrated biodiversity-inclusive spatial planning addressing land- and sea-use change, retaining existing intact and wilderness areas.

Target 2. Ensure that at least 20 per cent of degraded freshwater, marine and terrestrial ecosystems are under restoration, ensuring connectivity among them and focusing on priority ecosystems.

Target 3. Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.

Target 4. Ensure active management actions to enable the recovery and conservation of species and the genetic diversity of wild and domesticated species, including through ex situ conservation, and effectively manage human-wildlife interactions to avoid or reduce human-wildlife conflict.

Target 5. Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.

Target 6. Manage pathways for the introduction of invasive alien species, preventing, or reducing their rate of introduction and establishment by at least 50 per cent, and control or eradicate invasive alien species to eliminate or reduce their impacts, focusing on priority species and priority sites.

Target 7. Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste.

Target 8. Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through ecosystem-based approaches, contributing at least 10 GtCO₂e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity. Meeting people's needs through sustainable use and benefit-sharing

Meeting people's needs through sustainable use and benefit-sharing

Target 9. Ensure benefits, including nutrition, food security, medicines, and livelihoods for people especially for the most vulnerable through sustainable management of wild terrestrial, freshwater and marine species and protecting customary sustainable use by indigenous peoples and local communities.

Target 10. Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.

Target 11. Maintain and enhance nature's contributions to regulation of air quality, quality and quantity of water, and protection from hazards and extreme events for all people.

Target 12. Increase the area of, access to, and benefits from green and blue spaces, for human health and well-being in urban areas and other densely populated areas.

Target 13. Implement measures at global level and in all countries to facilitate access to genetic resources and to ensure the fair and equitable sharing of benefits arising from the use of genetic resources, and as relevant, of associated traditional knowledge, including through mutually agreed terms and prior and informed consent. Tools and solutions for implementation and mainstreaming

Tools and solutions for implementation and mainstreaming

Target 14. Fully integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows are aligned with biodiversity values.

Target 15. All businesses (public and private, large, medium and small) assess and report on their dependencies and impacts on biodiversity, from local to global, and progressively reduce negative impacts, by at least half and increase positive impacts, reducing biodiversity-related risks to businesses and moving towards the full sustainability of extraction and production practices, sourcing and supply chains, and use and disposal.

Target 16. Ensure that people are encouraged and enabled to make responsible choices and have access to relevant information and alternatives, taking into account cultural preferences, to reduce by at least half the waste and, where relevant the overconsumption, of food and other materials.

Target 17. Establish, strengthen capacity for, and implement measures in all countries to prevent, manage or control potential adverse impacts of biotechnology on biodiversity and human health, reducing the risk of these impacts.

Target 18. Redirect, repurpose, reform or eliminate incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.

Target 19. Increase financial resources from all sources to at least US\$ 200 billion per year, including new, additional and effective financial resources, increasing by at least US\$ 10 billion per year international financial flows to developing countries, leveraging private finance, and increasing domestic resource mobilization, taking into account national biodiversity finance planning, and strengthen capacity-building and technology transfer and scientific cooperation, to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework.

Target 20. Ensure that relevant knowledge, including the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior, and informed consent, guides decision-making for the effective management of biodiversity, enabling monitoring, and by promoting awareness, education and research.

Target 21. Ensure equitable and effective participation in decision-making related to biodiversity by indigenous peoples and local communities, and respect their rights over lands, territories and resources, as well as by women and girls, and youth.

This page is intentionally left blank

Appendix 2 – Pre Consultation Response on The New Northern Ireland Biodiversity Strategy

Belfast City Council welcomes the opportunity to input into the new Northern Ireland Biodiversity Strategy and looks forward to working with the Department of Agriculture, Environment and Rural Affairs (DAERA) on the development and delivery of the strategy.

Background

DAERA requested input from BCC in relation to strategic targets; 1, 3,6,12, and 14.

- (i) How your area of responsibility relates to biodiversity?
- (ii) What factors or changes do you intend to put in place that could benefit biodiversity – or possibly be counterproductive?
- (iii) What do you envisage needs to happen in the medium to long term to assist “turning the curve” in terms of restoring species or habitats to a better overall ecological condition? And
- (iv) What overall strategic milestones or outcomes do you envisage are required?

Question Responses

The Wildlife and Natural Environment (Northern Ireland) Act 2011 introduced a statutory duty for the Council to further the conservation of biodiversity. The duty requires public bodies “*in exercising any functions, to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions.*” In performing this duty the Council must have regard to the NI Biodiversity Strategy.

Target 1. Ensure that all land and sea areas globally are under integrated biodiversity-inclusive spatial planning addressing land- and sea-use change, retaining existing intact and wilderness areas.

The Council is the planning authority and, for the vast majority of planning applications, it is the final decision-maker. Council’s decision-making process ensures that biodiversity and other natural heritage issues are taken into account in assessing planning applications. Current planning policy provisions that inform planning decisions are set out in the Strategic Planning Policy Statement (SPPS), Planning Policy Statements (PPSs) and the adopted and draft area plans for the city. The Council’s new Local Development Plan – Plan Strategy (when adopted) will supersede any area plans and the various PPSs that currently apply. The policy approach in the new Plan Strategy is consistent with the SPPS, including in terms of biodiversity and natural heritage. The proposed approach in the Local Policies Plan is to continue to designate Sites of Local Nature Conservation Importance (SLNCIs) in addition to the national and international sites.

The draft Plan Strategy has been prepared within the context of the Council’s Community Plan, ‘The Belfast Agenda’, and will shape the future of the city. A Strategic Aim of the Plan is Promoting a Green and Active Place and the Plan includes a number of Policies to support biodiversity including but not limited to

- ENV3 – Adapting to environmental change,
- GB1 – Green and blue infrastructure network,
- OS1 – Protection of open space,
- NH1 – Protection of natural heritage resources and
- Tre 1 – Trees

In addition, the Council has adopted the Green and Blue Infrastructure Plan (GBIP) 2020 which, whilst not a statutory planning/land use document, considers biodiversity matters and seeks to achieve a net gain in biodiversity through Council operations and projects. The

new LDP incorporates the GBIP principles and is considered to further promote biodiversity and wider green infrastructure matters in planning decision-making.

Target 3. Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.

Currently the Council only has remit in terms of Local Nature Reserves and SLNCIs as identified within the LDP. This target is especially difficult within an Urban context given existing pressures and competing interests and demands in terms of land use and ecosystem services such as flood attenuation and carbon storage all from a finite land resource.

BCC would welcome the opportunity to work with the Department to investigate opportunities, constraints and mechanisms in how the 30x30 target may be achievable equitably, especially within an urbanised Council Area.

Target 6. Manage pathways for the introduction of invasive alien species (IAS), preventing, or reducing their rate of introduction and establishment by at least 50 per cent, and control or eradicate IAS to eliminate or reduce their impacts, focusing on priority species and priority sites.

Council welcomes the Target to manage pathways for the introduction of IAS but would highlight the need for robust legislation and increasing biosecurity funding aimed at countering invasive species to at least £3 million a year as recommended in the Environmental Audit Committee Report 2019.

Council also highlights the need for additional resources across all sectors of society to manage the impacts of IAS. Currently IAS cost the UK economy £1.8bn a year with much of these costs borne by individual landowners.

There is a need for co-ordinated partnership working especially where there are multiple landowners such as along watercourses. BCC recommends the re-establishment of the Invasive Species Ireland Initiative which brought together government, landowners, academics and eNGOs to address IAS.

Target 12. Increase the area of, access to, and benefits from green and blue spaces, for human health and well-being in urban areas and other densely populated areas.

Council queries limiting this Target to urban areas. Often urban areas are already under extreme pressures from human impacts, yet as they are densely populated, there is often a greater need for ecosystem services such as air quality, flood attenuation etc. Facilitating human access to areas can result in habitat fragmentation and loss of quality for example through disturbance, lighting, and increased IAS all negatively impacting ecosystem services.

How does the Department intend to address these competing priorities and protect areas already under significant pressure? This is especially problematic when viewed along with the requirements of Targets 1 and 3.

Target 14. Fully integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of

environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows are aligned with biodiversity values.

Belfast City Council welcomes the opportunity to work with the Department on any mechanisms to mainstream biodiversity across Central and Local Government.

(ii) What factors or changes do you intend to put in place that could benefit biodiversity – or possibly be counterproductive?

Belfast City Council has a significant number of corporate Plans and Strategies which support and contribute to the protection of the natural environment. These include but are not limited to the Belfast Agenda, Local Development Plan, Green and Blue Infrastructure Plan, Belfast Open Space Strategy and the Resilience Strategy. Council is in the process of developing the new Belfast Local Biodiversity Action Plan which will set local priorities and galvanise local action across Belfast.

(iii) What do you envisage needs to happen in the medium to long term to assist “turning the curve” in terms of restoring species or habitats to a better overall ecological condition?

1. Robust Legislation and policies for example in terms of protection of priority habitats and species outside designated sites.
2. Baseline data – the dearth of ecological data across most habitats and taxa prevents informed decision making and facilitates short term decisions over long term societal benefits. It is impossible to monitor trends across most taxa and biodiversity indicators especially at a local level due to this data deficiency.
3. Cessation of incentives which are damaging the natural environment. The Environmental Audit Committee found that all too often, governments spend more on practices that exploit the natural environment than conserving it.
4. Resources – Lack of investment in the natural environment is simply storing up costs for future generations for example on invasive alien species which is currently estimated to cost £1.8 bn to the UK economy.
5. Resources – ecological skills development in particular across all areas of Central and Local Government but also across within the ecological sector. There is a significant skills gap recognised by the sector which needs addressed.
6. For the new NI Biodiversity Strategy to succeed it needs to identify existing pressures and constraints accompanied with detailed actions to address these. There needs to be SMART Targets with interim milestones and monitoring accompanied with resources both skilled professionals and revenue which can be accessed by environmental organisations and Local Authorities.
7. Mainstreaming Biodiversity - Collaboration across all sectors is required to deliver the outcomes needed in Central and Local Government, Environmental NGOs but also, all public bodies including the Health and Education sectors.
8. Structures to enable Local prioritisation for example reinstatement of the NI Biodiversity Group and the Habitat and Species Action Plan Groups which brought together Government, eNGOs and the business sectors.

(iv) What overall strategic milestones or outcomes do you envisage are required?

The four goals and 10 milestones identified in the Framework are comprehensive and should be adopted at the Northern Ireland level including those on net gain, protection of genetic diversity, reduction in extinction rates, protection and restoration of ecosystem services, equitable sharing of resources and adequate finances to implement the Framework.

This page is intentionally left blank



Subject:	DoF Consultation on proposed amendments to Technical Booklet Guidance to Part F (Conservation of fuel and power) of the Building Regulations.
Date:	7 December 2021
Reporting Officer:	Ian Harper, Building Control Manager
Contact Officer:	Mark McCleery, Principal Building Control Surveyor

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of Main Issues
1.1	To consider a draft response to a Department of Finance consultation on proposed amendments to Technical Booklet Guidance to Part F (Conservation of fuel and power) of the Building Regulations (Northern Ireland).
2.0	Decision(s) required and recommendations
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> Consider the draft response to the Department of Finance consultation and agree, subject to any amendments, a response on behalf of the Council. Subject to Council ratification.

	<ul style="list-style-type: none"> The closing date for responses to this consultation is 23:59 on Sunday 19 December 2021, with responses to be made online.
3.0	Main report
	<u>Key issues</u>
3.1	The Buildings Standards Branch of the Department of Finance (DoF) is seeking the views of the Council on their proposals to amend Technical Booklet Guidance to Part F (Conservation of fuel and power) of the Building Regulations.
	<u>Background</u>
3.2	The Building Regulations (Northern Ireland) Order 1979 (as amended) places a duty on a district council to enforce building regulations in its district. Part F (Conservation of fuel and power) of the Building Regulations sets minimum standards for building work with respect to carbon performance and energy conservation measures.
3.3	Building Regulation 43B (<i>Nearly zero-energy requirements for new buildings</i>) of Part F requires that new buildings are ‘nearly zero-energy buildings’ (NZEB). This requirement has applied to all newly erected buildings from 31 December 2020.
3.4	NZEB is defined as “ <i>a building that has a very high energy performance, as determined in accordance with the National calculation methodology, where the nearly zero or very low amount of energy required should be covered to a very significant extent by energy from renewable sources, including energy from renewable sources produced on-site or nearby</i> ”.
3.5	Regulation 39 (Conservation measures) requires reasonable provisions for conservation of fuel and power by limiting heat losses and through use of efficient services with appropriate controls.
3.6	Regulation 40 (Target carbon dioxide emission rate) of Part F requires that a new building’s rate of emissions does not exceed a Target carbon dioxide Emissions Rate (TER) when modelled in accordance with the National Calculation Methodology (NCM).
3.7	Regulation 43A (<i>Consideration of high-efficiency alternative systems</i>) of Part F requires that designers of new buildings consider “high-efficiency alternative systems”, (e.g. decentralised renewables, district heating, combined heat and power systems, heat pumps, etc.). The requirement is only to demonstrate that these options have been considered. In practice, very

	few high-efficiency alternatives are proposed for inclusion in the proposed building after consideration.
3.8	The UK government is developing a programme of amendments to the NCM software to reflect the latest scientific understanding of building physics, revised carbon, primary energy and cost factors for UK fuels, and to implement various technical adjustments necessary for compliance with Directive 2018/844/EU.
3.9	These changes will result in new software, a new Primary Energy (PE) target metric and revised cost and carbon factors, which will input to the calculation of a revised TER. The new software will apply alongside an uplift in Building Regulation requirements in each administration, rolling out from early 2022 onwards. However, the outworking of these revisions is complex, and consequences need local consideration (e.g. reduced carbon and PE factors could encourage uptake of electric heating, which would be more expensive to operate than standard boilers). The Department and industry will need to consider these issues and proposals once the position in England has settled.
3.10	However, considering concerns that energy efficiency standards here have been too low for too long and in consideration of the Assembly's declaration of a climate emergency and commitments to address climate change in the <i>New Decade, New Approach</i> proposals, the Department is keen to prioritise improved standards around NZEB and not to delay uplift further whilst we consider this, more complex, position. While some subsequent re-adjustment of standards and a potential further uplift will be necessary in consequence of the UK NCM development process, the Department is of the view that this should not delay action where possible.
3.11	The Department accepts that a fundamental in-depth review of Part F (Conservation of fuel and power) and Part K (Ventilation) will be required to take account of the position and proposals of the other administrations and that ongoing work will be required thereafter.
3.12	The Department is developing a Discussion Document for public consultation in the coming months, which will provide further input on the relevant issues and seek to outline pathways towards very high efficiency standards for new buildings in the medium term. The proposals within this current consultation are intended to provide an uplift to the requirements for new buildings as an interim "steppingstone" measure.

	<p><u>Consultation proposals</u></p>
3.13	<p>The Department is consulting on proposals to uplift the minimum energy efficiency standards for new buildings. Three options have been considered –</p> <p><i>Option 1:</i> do nothing.</p> <p><i>Option 2:</i> require NZEB buildings to better the current Target carbon dioxide Emissions Rate (TER) outputs by 25%, in the case of new dwellings, and 15%, in the case of new non-domestic buildings; and</p> <p><i>Option 3:</i> require NZEB buildings to better the current Target carbon dioxide Emissions Rate (TER) outputs by 40% in the case of new houses, 25% in the case of new flats, and 15%, in the case of new non-domestic buildings.</p>
3.14	<p>Option 3 is the Department's preferred option with a better overall return on investment. It would deliver more carbon savings and better reductions in energy bills, albeit with higher build costs for developers. In the draft response we have confirmed that this is the preferred option for the Council as well.</p>
3.15	<p>The proposed variation in betterment between houses, flats and non-domestic buildings is proposed so that in the case of dwellings, any on-site renewable generating technologies (e.g. photovoltaic panels), used to achieve the improved emissions performance, should normally be able to avail of the more straightforward (G98) grid connection processes.</p>
3.16	<p>Options 2 and 3 set new limits on fabric standards to require provision of building fabric with U-values (and in the case of dwellings, a glazing assessment), as specified within TBF1 and TBF2. A whole building area-weighted U-value assessment provides an alternative approach, provided the overall U-values deliver the same level of performance; and encourage air tightness testing, including removing options on air permeability assessment for a default value of 15 m³/(h.m²) to be submitted on small sites for untested dwellings and the similar 500 m² threshold currently permitted for non-domestic buildings.</p>
3.17	<p>All options retain the use of the existing SAP 2009 software, while the new NCM software is developed at UK level. Carbon factors in SAP 2009 do not reflect recent decarbonisation of the electricity grid supply. This means that where the 'betterment' is delivered with an electricity-led solution (e.g. with photovoltaic panels), the actual carbon abatement is likely to be significantly less than the betterment requirements.</p>
3.18	<p>New guidance is proposed to deal with circumstances where the local electricity network cannot accommodate export from on-site renewables that generate electricity (e.g.</p>

	<p>photovoltaic panels, small wind turbines, etc.) which cannot be directly used in the building. It is unclear if this will be a long-term issue as increasing use of electricity and smart systems developments may facilitate more renewables in the medium term. Future uplifts and a revised NCM should also look to deal with this again in future uplifts.</p>
3.19	Other amendments are intended to clarify, or rectify, previous guidance to reflect the current working and enforcement practices. The changes include re-wording to promote an expectation of air-tightness testing and to clarify provisions in relation to thermal bridge assessments.
3.20	<p>The package of consultation documents can be found on the Department's website: - https://www.finance-ni.gov.uk/consultations and includes the following: –</p> <ul style="list-style-type: none"> • Consultation document outlining the proposals. • Draft Regulatory Impact Assessment. • Draft amended Technical Booklet F1 • Draft amended Technical Booklet F2 • Rural Needs Impact Assessment and • Draft Equality Screening, for the proposed changes.
3.21	The proposed consultation response is included as Appendix 1 to the report.
3.22	<p><u>Financial & Resource Implications</u></p> <p>Some additional training of staff on the changes to the requirements/guidance will be required, as well as guidance for customers on the council website, etc. These will be carried out as normal course of business by existing staff.</p>
3.23	<p><u>Equality or Good Relations Implications/Rural Needs Assessment</u></p> <p>The proposed amendments have been screened out of equality impact assessment requirements by DoF. The draft equality impact screening assessment is on the Departmental Website.</p>
4.0	Appendices – Document Attached
	Appendix 1. Proposed Consultation Response

This page is intentionally left blank

Q1: Do you agree that it is sensible to prioritise the proposed amendments to Technical Booklets F1 and F2 guidance in advance of awaiting outcomes around the development of new UK NCMs, software, and proposed building regulations uplifts?

- **Yes**

We have already fallen well behind the energy performance of buildings standards for buildings currently being constructed in neighbouring jurisdictions. An incremental uplift now will at least give breathing space to consider future uplifts whilst at the same time providing tangible benefits in terms of buildings' energy performance and reduced carbon production.

Q2: Do you agree that additional manual checks of current software reports will be manageable in practice to demonstrate compliance in relation to the new requirements for:

a) the betterment of the TER;

b) an air-tightness performance no greater than $10 \text{ m}^3/(\text{h.m}^2)$ at 50Pa; and

c) new U-value limits for building fabric (see paragraph. 5.59 on this below)?

- **Yes to (a), (b) & (c)**

A small additional resource (surveyor time) will be required to carry out these proposed manual checks on the software adjustment – and the software will in time be revised to take changes into account so that the outputs do not require a manual adjustment.

Paragraph 2.35A of the proposed new TB F1 and Paragraph 2.47A and 2.47B of the proposed new TB F2 provide details for the betterment of the TER and that is covered by Regulation 43B. However, we have some concerns that Regulation 40 indicates 'a target carbon dioxide emission rate for that building shall be calculated using a national calculation methodology' (NCM). Unless the NCM definition is amended to include these new proposals it and Part F will be contradictory and possibly misleading.

An air-tightness maximum of $10 \text{ m}^3/(\text{h.m}^2)$ at 50Pa is readily achievable – most new buildings will be considerably more air-tight than this so the increase in minimum standard from 15 to

10 is welcomed. The 40% uplift in TER will in practice mean that a much better airtightness performance than 10 is likely to be the norm required to achieve compliance.

We agree with the need to improve fabric performance whilst at the same time providing an element of flexibility that allows trade-offs between elements whilst still meeting the overall energy performance targets

Q3: Do you agree that the new guidance should apply from three months of publication of the guidance and from as early in 2022 as practicable?

- **Yes**

Q4: Do you agree that Option 1 should be dismissed?

- **Yes**

Q5: Do you agree that the above proposals provide an appropriate interim step, which can be implemented quickly?

- **Yes**

High standards of air-tightness performance are already being achieved by competent builders. it is stated in the guidance that the improved standards required in overall performance are expected to lead to a greater use of renewable generation technologies. It may take some time for the application of these technologies to become mainstream, as there will be a learning curve for all but a few with the expertise in these (currently) specialist technologies.

Q6: Do you prefer Option 3 (40% betterment of the TER for houses, 25% for flats and 15% for new non-domestic buildings), or are the standards outlined in Option 2 (25% betterment of the TER for all dwellings and 15% for buildings other than dwellings) preferred?

- **Preference is for Option 3**

The preference is for Option 3, as it will bring NI up to a standard more on a par with our neighbours in England & ROI, but more importantly will be a step towards reducing our carbon emissions.

If answering 'None of the above', please take into account and advise if proposals described here should be delayed or halted, in order to progress in line with your suggestions.

Q7: Do you agree that the definition of 'flat' in regulation 2 provides a sufficiently clear discrimination of the building types to enable the different betterment rates to be applied to houses (40%) and flats (25%)?

- **Yes**

It is agreed the definition of flat in Regulation 2 recognises the difference between a flat and a house. Regulation 32 (2) provides the definition of a 'Dwellinghouse'.

Q8: Do you agree that the proposed DER requirement for a 25% betterment of the TER should be applied to flats?

- **Yes**

We agree 25% betterment rate to flats as a workable interim measure given the design constraints of flats as opposed to houses. The introduction and 'normalisation' of renewable technologies will allow a further betterment in future – for many flats the scope to achieve the more onerous percentage TER uplift applied to houses may be harder to achieve given their usually smaller thermal envelope.

If no, should they be more onerous or less onerous? Please explain your reasoning and provide supporting evidence for alternative suggestions, taking into account that further review is planned for 2022/23 and that other building regulation proposals are likely to impact some flats.

Q9:

Do you agree with the heat pump costing assumptions (see Annex A in the Regulatory Impact Assessment (RIA)), the 10% incident rate estimate for flats and the proposed level of uptake for heat pumps in houses, used in our modelling (see Annex C in RIA), appropriate?

- **Yes**

We have no evidence-based information to offer an informed opinion on the likely uptake of heat-pump technology or the costing assumptions of building owners adopting heat-pump technology. However, the figures in the RIA appear reasonable assumptions.

Q10: Do you agree that the Department should make any necessary adjustment to attend to replicating the treatment of heat pumps proposed under Part L revisions in England for non-domestic buildings?

- Yes

Q11: Do you have any data or modelling that would be useful in helping to assess the likely cost impacts on specific building types under the proposals?

- No

Q12: Do you support the overall proposals for buildings other than dwellings, including proposed BER requirement for a 15% betterment of the TER for new non-domestic NZEB buildings?

- Yes

Yes, we agree that as an interim measure and based on information provided, a 15% betterment appears to be a reasonable level to apply across all non-domestic building types, especially if there is to be a further review of Part F in 2022/23.

**If no, should the proposals be more onerous or less onerous?
Please explain your reasoning and provide supporting evidence for alternative suggestions, taking into account that further review is planned for 2022/23.**

Q13: Do you agree that adopting the 2013 edition of the Non-Domestic Building Services Compliance Guide is worthwhile and would be at negligible cost to current practice?

- Yes

If no, please provide evidence to explain where this would be difficult or how cost assumptions should be revised.

Q14: Do you agree that the guidance revising the limiting U-values is worthwhile and workable for industry and enforcement?

- Yes

If no, please explain your reasoning.

Q15: Do you agree that the revisions to guidance on thermal bridging are a helpful clarification of current processes?

- Yes

Q16: Do you agree with the removal of the default values for air permeability of 15 m³/(h.m²) currently permitted?

- Yes

Most buildings are currently constructed with air permeability rates much lower than 15, and 15 is a poor standard for modern construction techniques, especially now that the requirement to test permeability to show compliance with the design SAP/SBEM output has been in place for so long.

If no, please explain your reasoning.

Q17: Do you agree that the overall proposed changes on fabric standards are helpful to support a 'fabric-first' approach?

- Yes

If no, please explain your reasoning and what should be done, taking into account that any significant review may delay implementation

Q18: Do you agree that the guidance on non-export connections is helpful?

- Yes

If no, please explain your reasoning.

Q19: Do you have any comment on our impact assessment and its key assumptions?

- Yes

Extremely comprehensive and informative. However, the assessment makes no reference to the impact on Local Authority Building Control services for the additional assessment time to confirm compliance whilst awaiting SAP software upgrades. This will put an addition resource burden on Building Control with no further resources available.

If no, please explain your reasoning and suggest alternatives calculations.

Final question: General suggestions and observations

Q20: Have you any suggestions or observations that do not fit into the preceding questions?

- **No**



Subject:	DoF Consultation on Proposed Building (Prescribed Fees) (Amendment) Regulations (Northern Ireland) 2022
Date:	7 December 2021
Reporting Officer:	Ian Harper, Building Control Manager
Contact Officer:	Laura Hillis, Principal Building Control Surveyor

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of Main Issues
1.1	To consider a draft response to a Department of Finance consultation on proposed amendments to Schedules 1 and 2 of the Building (Prescribed Fees) Regulations (Northern Ireland) 1997 and general comments on the Regulations which are also being invited to inform a wider review of the fees regulations.
2.0	Decision(s) required and recommendations
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> Consider the draft response to the Department of Finance consultation and agree, subject to any amendments, a response on behalf of the Council. Subject to Council ratification.

	<ul style="list-style-type: none"> The closing date for responses to this consultation is 23:59 on Sunday 19 December 2021, with responses to be made online.
3.0	Main report
	<u>Key issues</u>
3.1	<p>The Buildings Standards Branch of the Department of Finance (DoF) is seeking the views of the Council on their proposals to amend Building (Prescribed Fees) Regulations (Northern Ireland) 1997 and general comments on the Fees Regulations are also being invited to inform a wider review.</p>
	<u>Background</u>
3.2	<p>The Building Regulations (Northern Ireland) Order 1979 (as amended) places a duty on a district council to enforce building regulations in its district, and also authorises district councils to charge prescribed fees for or in connection with the performance of prescribed functions of theirs relating to building regulations.</p>
3.3	<p>Prescribed fees for building regulation applications were introduced in Northern Ireland in 1982, prior to which the cost of processing applications and inspecting the associated building works on site was borne fully by ratepayers, rather than by those making the applications.</p>
3.4	<p>The Building (Prescribed Fees) Regulations (Northern Ireland) 1997 (as amended) sets out the prescribed functions for which a district council may charge a fee for and the level of fee that may be charged. The prescribed functions are:</p> <ul style="list-style-type: none"> approval or rejection of plans or building notices; inspection of works; regularisation of unapproved works; and approval or rejection of type approval certificates.
3.5	<p>In the current Fees Regulations, the fees are set out in three schedules to the regulations:</p> <ul style="list-style-type: none"> Schedule 1 for one or more small domestic buildings (new build dwellings); Schedule 2 for certain small domestic buildings, extension and alterations; and Schedule 3 for all other work, with fees based on estimated costs of the work.

3.6	<p>The Fees Regulations have not been amended since 2013, when Schedule 1 and 2 fees were raised as part of a proposed two stage uplift. The second uplift did not happen and this has resulted in major shortfalls in the fees income covering the work set out in Schedule 1 and Schedule 2. As a result the ratepayer is subsidising these activities.</p> <p><u>Consultation proposals</u></p>
3.7	<p>The Department has identified a full review as being needed to ensure that the level of fees charged by district councils for undertaking prescribed functions in respect of the building regulations follows the ‘user pays principle’ and moves towards 100% cost recovery. This would mean that the person making a building regulation application meets the full cost of processing an application for that type of work.</p>
3.8	<p>However, to achieve this and to bring the fees charged in line with those charged in other administrations in the UK, significant uplifts would be required, in some cases more than doubling the current fee level. The Department has recognised that a move to a 100% cost recovery model would therefore need to be achieved in a phased approach.</p>
3.9	<p>The department proposes a two-stage uplift of the fees as set out in Schedules 1 and 2 of the Fees Regulations. The first increase, of 17.5%, is proposed in April 2022, with a further increase proposed in April 2023 resulting in a total overall increase of around 35% for most of the fees included in these schedules. It must be stressed that this level of increase will in no way provide fees that would enable Building Regulations cost recovery for Belfast.</p>
3.10	<p>The consultation is also asking for views on the move to 100% cost recovery for the prescribed functions, and for general comments to inform a future wider review of the Fees Regulations.</p> <p><u>Draft Consultation Response</u></p>
3.11	<p>Full details of our comments on the proposals are contained within the draft consultation response which is attached as appendix 1.</p>
3.12	<p>In summary, the proposals for a two-stage uplift of the Schedule 1 and Schedule 2 fees is welcomed. However, there is a concern that both uplifts may not occur, and that a full review of the Fees Regulations to provide near cost recovery may not take place. Therefore, it is suggested that the Department consider providing a mechanism by which the fees could increase annually in line with inflation in addition to any proposed increases.</p>
3.13	<p>The move to 100% cost recovery and the ‘user-pays’ principle is also welcomed, although it has been highlighted that the prescribed functions do not cover all activities required for the</p>

	<p>enforcement of the building regulations, and therefore will never equate to 100% cost recovery for the building regulations. For example, matters that are not covered include formal enforcement and court action, inspections to identify unauthorised works, giving general advice to the public, other council departments, etc., and carrying out prescribed functions on fee exempt works.</p>
3.14	<p>We also noted that the fee to give near 100% cost recovery in the processing of applications depends on the level of investigation into compliance with the building regulations that is undertaken. Guidance on what is expected of the Council's in this regard would be beneficial in demonstrating what the set fee was calculated as covering and would ensure greater consistency of approach across Councils.</p>
3.15	<p>Some issues that have been long recognised as anomalies have been highlighted including instances of disparity between Schedule 2 and Schedule 3 fees.</p>
3.16	<p>It has also been suggested that the prescribed functions should be reviewed to include additional items such as a charge for pre-application advice and an additional fee for more than one resubmission of plans that have been rejected. By way of illustration over the last 5 years the first-time approval rate for full plans applications is on average just 18%. This brings significant extra workload and an additional charge may well encourage greater diligence in submission preparation.</p>
3.17	<p>The fee exempt status of the installation of cavity wall insulation requires review as does the definition of a disabled person along with greater clarity on which works for a disabled person are fee exempt.</p>
3.18	<p>The package of consultation documents can be found on the Department's website: - https://www.finance-ni.gov.uk/consultations and includes the following: –</p> <ul style="list-style-type: none"> • Consultation document outlining the proposals; • Draft Regulatory Impact Assessment; • Rural Needs Impact Assessment <p>and</p> <ul style="list-style-type: none"> • Draft Equality Screening, for the proposed changes.

	<u>Financial & Resource Implications</u>
3.19	Some additional training of staff on the new fee scales will be required, along with guidance for customers on council website, etc. These will be carried out as normal course of business by existing staff.
	<u>Equality or Good Relations Implications/Rural Needs Assessment</u>
3.20	The proposed amendments have been screened out of equality impact assessment requirements by DoF. The draft equality impact screening assessment is on the Departmental Website.
4.0	Appendices – Document Attached
	Appendix 1 Proposed Consultation Response

This page is intentionally left blank

Prescribed Fees Consultation.

Belfast City Council Draft Consultation Response. November 2021

Q1. Would you support a move to a 100% cost recovery Model, where the user pays the full cost incurred by councils of processing building control applications rather than ratepayers subsidising the service?

Yes

The Council would be supportive of a move to a 100% cost recovery model where the user pays the full cost of processing building regulation applications.

As outlined in the consultation, Schedule 1 and 2 building regulation fees have not increased sufficiently over time, and currently are at a level far below the cost of delivering the four prescribed functions outlined in the current fees legislation, as the fee schedules were originally established to do. This has been exacerbated by the continually increasing complexity of the regulations since the fees were introduced and the associated extra time and resource required to carry out these functions.

However, the Council would wish to emphasise that a move to 100% cost recovery model for the processing of building regulations applications and the user pays principle will not make Building Control's building regulation function completely non-rate borne because, as is recognised in the consultation document, not all aspects of the building regulation service are covered by the four prescribed functions.

The Council would make reference to the Building (Local Authority Charges) Regulations 2010 which were introduced to enable local authorities in England and Wales to determine their own charges, with the overriding principle to recover all costs associated with performing chargeable functions and providing chargeable advice. These regulations make it clear that only certain building regulation functions may attract a charge (chargeable activities); and the Council would also refer to the CIPFA Local Authority Building Control Accounting Guidance for England and Wales (Fully Revised Second Edition 2010) which sets out the 3 work activity types undertaken by Building Control as:

- Building Regulation Chargeable activities
- Building Regulation Non-chargeable activities
- Other Building Control Services

Building regulation non-chargeable activities outlined in CIPFA guidance include formal enforcement and court action, as well as inspections to identify unauthorised works, giving general advice to the public, their representatives, other council departments etc, liaison with fire authority, and carrying out prescribed functions on fee exempt works, which include works carried out for disabled people and in Northern Ireland also the installation of cavity wall insulation.

In the move towards 100% cost recovery, and the setting of fees to achieve this, the Council would request that the Department consider the need for more clarity and guidance to be provided on the chargeable building regulation activities that the application fee is to cover, and what building regulation activities are to remain rate borne, and in particular that clarity be provided around formal enforcement/court action.

The Council would also request a review of the prescribed functions, with consideration given to the inclusion of other activities, such as the provision of information as a prescribed function, enabling charging for pre-application advice. In addition, currently for a Full Plans application once rejected amended plans can be resubmitted any number of times under the original fee, making 100% cost recovery impossible. This is an issue for the Council, over the 4 financial years from 2017 to 2021 we received 1245 Full Plan applications on average per year but in the same timeframe dealt with an average of 1841 resubmitted applications meaning every application is resubmitted on average 1.5 times. With some individual applications being submitted multiple times and a first time approval rate of only around 18% this brings significant extra workload, and therefore consideration should be given to an additional charge for more than one resubmission which, in turn, would bring greater diligence in submission preparation.

The Council would also request that the current fee-exempt applications within the regulations be reviewed. This is necessary if 100% cost recovery is to be aimed at for the processing of building regulation applications.

In addition, in terms of the user-pays principle, and in determining what the fees should be set at in the future to achieve 100% cost recover, the Council would emphasise, as is touched upon in the consultation, that Building Control is not providing a service to individual users in return for a fee, rather the fee charged should be what is considered necessary for the Council to provide the prescribed functions to carry out the level of enquiry into compliance with the building regulations that is felt to be on average required for particular categories of work.

The level the fees should be set at is therefore interrelated with what level of enquiry would seem reasonable, and guidance on what is expected of the Council's in this regard may be beneficial in demonstrating what the set fee was calculated as covering. Although all Council's work to the same fees, their cost recovery will not be the same for many reasons including the type of applications they receive, their direct and indirect costs which vary, and in addition one Council may by maintaining a reduced resource and reduced enquiry into compliance, achieving better cost recovery rates than a Council with more staff and a much higher level of enquiry.

Q2. Are there any other aspects of the Fees Regulations you feel should be included in the review?

Yes

The Council would welcome a wider review of the fees regulations, and indeed such a review has been long awaited, as some issues beyond the level of the fees have been long-recognised.

The Council would make the following general comments on the Fee regulations to inform a wider review, for consideration by the Department:

- Consider introducing into the prescribed functions the provision of information (after the first hour) to allow pre-submission consultations to be charged for.
- Consider introducing a charge for the resubmission of amendments following rejection (after the first resubmission) and for amendment approvals
- There is a disparity in fee charged under Schedule 1 for a newbuild dwelling under 250m² and a dwelling slightly larger that falls under Schedule 3 with the fee based on the estimated cost of works, which attracts a significantly larger fee. Consideration is needed in how to

address this – with one option being the provision of more fee bands for dwellings of larger floor areas.

- There is disparity between the fee charged under Schedule 2 for extensions 40 - 60m² and an extension just over 60m² that falls under Schedule 3 with the fee based on the estimated cost of works, which attracts a significantly larger fee. Consideration is needed in how to address this disparity. One option may be to provide set fee bands under Schedule 2 for larger extensions.
- The fee-exempt status of cavity wall insulation installation should be reviewed.
- The fee exempt works for people with a disability should be reviewed, and consideration given to updating the definition of a disabled person in the regulation which only currently includes a physical disability. More clarity should be given on what works and what building types (for example dwellings only) a disabled fee exemption can be claimed for, and what supporting documentation the Council should receive to support the exemption claim.
- Consideration should be given to allowing the fee for multiple works attracting set fees to be calculated instead on the overall estimated cost of the works.
- In Schedule 2 use of the set fee for microgeneration should be clarified, and looking to the future the inclusion of fees for renewables and, for example, conversion of heating systems to use heat pumps should be considered.
- The Council notes that this consultation is only addressing Schedule 1 and Schedule 2. While agreeing that Schedule 3, being based on estimated cost of works is somewhat inflation-proofed, in a full review the Council would feel it sensible to also review Schedule 3. For some commercial building types estimated cost does not necessarily equate to increased building regulation complexity or time spent on prescribed functions. Therefore Schedule 3, particularly in the higher estimated cost end should be considered at the same time as Schedule 1 and 2. An option of providing bands for different development types should be considered.
- Consideration to giving more guidance on what items should be included in an estimated cost should be reviewed. The Council often has difficulty obtaining the estimated costs of works to assess the fee for 'other works' in both domestic and commercial schemes, and often when received these need to be challenged as being too low. Consideration should also be given to the provision of regularly updated Northern Ireland construction cost indices to building control for fees to be assessed against.
- While currently there are no set fees for non-domestic works, consideration could be given for some set fees, for example for the installation of PV to a non-domestic building, as some items such as this with high cost of works are thought to currently attract too high a fee under Schedule 3.
- The Department should consider, as much as is feasible, the implications of all forthcoming changes to the Building Regulations and any extra roles or responsibilities under or as a result of the Building regulations that may come to Building Control in carrying out a full review the Fees regulations.
- The Council would request the Department to include a mechanism to uplift the Fees in line with inflation on an annual basis, which would be preferable to widely spaced ad-hoc fee reviews.

Q3. Do you agree with the Department's proposals to increase fees for Schedule 1 by 17.5% from 1st April 2022?

Yes

The Council is supportive of any increase and move towards 100% cost recovery. However, while supporting the proposed increases in fees the Council notes the following:

The Council notes that this two-stage uplift proposed is an interim measure in advance of a wholesale review of the Fees regulations. However, previous experience of a similar proposal has shown that while the first stage uplift may be adopted and implemented as planned there is no guarantee that the second uplift will be implemented. In addition, The Council notes that work on a comprehensive review of the Fees Regulations was commenced previously by the Department and did not come to fruition.

The Council would seek reassurances from the Department that both planned uplifts will be implemented.

The Council would also ask the Department to give an undertaking that it will completely review the Fees regulations and set out a timetable for providing new consultation proposals for consideration.

Q4. Do you agree with the Department's proposals for a further increase in Schedule 1 fees from 1st April 2023 that would result in an overall increase of 35% on these fees as they are now?

Yes

The Council is supportive of the second increase and understands the need to introduce these increases in 2 stages rather than as a single larger uplift. However, the Council would have preferred an increase that would achieve near 100% cost recovery at this time and would be clear that the 35% increase currently proposed, while welcome, is not adequate. The Council would also seek assurances from the Department that the proposed second uplift will indeed be implemented in April 2023.

The Council again notes that this two-stage uplift proposed is an interim measure in advance of a comprehensive review of the Fees regulations. The Council would ask the Department to give an undertaking that it will completely review the Fees regulations and set out a timetable for providing new consultation proposals for consideration.

Once a level of fees is set that achieves near cost recovery for the prescribed functions (taking into account the forthcoming changes to the Building Regulations and increasing complexity and time requirement resulting from them), and indeed from April 2024, in case the full fees review does not come to fruition as intended, the Council would request the Department to include a mechanism to uplift the Fees in line with inflation on an annual basis, which would be preferable to widely spaced ad-hoc fee reviews.

Q5. Do you agree with the Department's proposals to increase fees for Schedule 2 by 17.5% from 1st April 2022?

Yes

The Council is supportive of any increase move towards 100% cost recovery. Also see comments given in response to Q3.

Q6. Do you agree with the Department's proposals for a further increase in Schedule 2 fees from 1st April 2023 that would result in an overall increase of 35% on these fees as they are now?

Yes

The Council is supportive of the second increase and understands the need to introduce these increases in 2 stages rather than as a single larger uplift. However, the Council would have preferred an increase that would achieve near 100% cost recovery at this time and would be clear that the 35% increase currently proposed, while welcome, is not adequate. The Council would also seek assurances from the Department that the proposed second uplift will indeed be implemented in April 2023. Also see comments to given in response to Q4.

Q7. Do you agree with the analysis/principal assumptions, costs and impacts set out in the draft RIA?

Yes

In general, the Council agrees with the contents of the draft RIA. The Council would also agree that Option 3 is preferred in bringing some fee increases in the near term, while Option 2 is what the Council would wish to see achieved in the medium term.

However, the Council would note the following:

In the policy objectives and intended effects section, it states the intention of ensuring that building control can 'deliver an affordable, high-quality service to those that use it'. Building regulations enforcement is about enquiry into compliance, not a service provision.

While 5 Councils used the CIPFA guidance to calculate a chargeable hourly rate being used to calculate the sample proposed fees, it is clear that this will need to be further analysed and agreed between all 11 Councils for the full review of the fees. In England and Wales the Councils set their own fees and the CIPFA calculation methodology is based around the provision of detailed timesheets, capturing time spent on chargeable and non-chargeable building regulation activities and well as other building control functions. To estimate this on behalf of a whole Building Control service without such records, and then also establishing the direct and indirect costs to be included, is not a simple undertaking and can lead to wide discrepancies. In additional Council financial officers will need involvement and therefore the Council would consider that more work is needed around this before a final cost/hr figure for calculating fee proposals could be agreed.

It is stated for Option 2 that the proposed fees at 100% cost recovery would be broadly equivalent to England and Wales current fees. The Council would point out that England and Wales is subject to competition, and fee competition could be considered a factor in the 'race to the bottom' recognised over recent years.

This page is intentionally left blank



Subject:	Department for Communities - Notice to Quit consultation
Date:	7 th December 2021
Reporting Officer:	Siobhan Toland, Director of City Services
Contact Officer:	Claire O'Neill, Principal Environmental Health Officer

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	To seek approval to provide a Council response to a consultation from the Department for Communities in relation to proposals to amend the Notice to Quit period for private tenancies.
2.0	Recommendations
2.1	<p>The Committee is asked to</p> <ul style="list-style-type: none"> Note the draft proposals and agree the Council response under paragraph 3.3 and Appendix 2.
3.0	Main report
3.1	<p><u>Key issues</u></p> <p>In addition to the consultation response agreed by members at the 11th November People and Communities meeting regarding the Communities Committee private tenancies bill a further correspondence has been received. The Department for Communities issued a consultation</p>

	questionnaire on 1 st December (Appendix 1) to seek views and opinions to inform its policy position on the extension of the notice to quit period for private tenancies. The closing date for response is 25 th January 2022.
3.2	<p>The Private Tenancies Bill which is currently making its way through the NI Assembly contains a clause to increase the Notice to Quit period that a landlord is required to give a tenant depending on the duration of the tenancy:</p> <ul style="list-style-type: none"> • Notice to Quit will be increased to 8 weeks for tenancies lasting more than 12 months up to 10 years. • It also amends the Notice to Quit that a tenant has to give a landlord to 4 weeks if the tenancy has not been in existence for more than 10 years and 12 weeks if more than 10 years.
3.3	The Department wants to test if 8 weeks is a sufficient timeframe to allow tenants (resident in their homes for more than a year) to find an affordable, suitable new home and has therefore included a range of alternative Notice to Quit options for Council to consider.
3.4	Minister Hargey asked for some further research to be carried out on a range of Notice to Quit options and this work was recently completed by the Chartered Institute of Housing. This research has been summarised within the consultation document to provide additional context.
3.5	It is important to note that the draft Bill contains a provision which would allow the Notice to Quit to be amended in the future.
3.6	<p>The current notice to quit period under the Private Tenancies (NI) Order 2006 as amended by the Housing (Amendment) Act (NI) 2011 are as follows:</p> <ul style="list-style-type: none"> • Less than 5 years tenancy- 4 weeks' notice to quit. • More than 5 years but less than 10 years- 8 weeks' notice to quit • More than 10 years – 12 weeks' notice to quit.
3.7	<p>The response to the questionnaire is contained in Appendix 2, however the draft response is summarised as follows;</p> <ol style="list-style-type: none"> 1. The Council supports the view that the landlord should be required to give a longer Notice to Quit period than the Notice that a tenant is required to give a landlord. 2. The Council supports the view that Notices to Quit should vary depending on the length of the tenancy.

	<p>3. The Council supports the view that 12-month fixed term tenancies should be given more than 4 weeks' notice to quit</p> <p>4. The Council supports the view that the Notice to Quit period that a landlord should be required to give a tenant where the tenancy is between 12 months and 10 years in length should be 12 weeks</p> <p>5. The Council agrees that exemptions should be applied for certain defined circumstances and the Notice to Quit period should be reduced to 4 weeks where exemptions apply.</p> <p>6. The Council supports the view that tenants of HMOs should be given the same legislative protection as other private rented tenants. Tenants of HMOs are often the most vulnerable members of the community members so should be treated equitably in terms of the Notice to Quit period.</p>
3.8	<p>Financial and Resource Implications</p> <p>The Private Tenancies Bill when enacted will give local councils additional enforcement powers to deal with issues in the Private Rented sector. These additional powers will mean more enforcement officers will be required to deal with the additional workload. There will be fixed penalties introduced for some of the offences, but fixed penalty income will not cover the additional staffing and administrative resources required.</p>
3.9	<p>Equality or Good Relations Implications/ Rural Needs Assessment</p> <p>None associated with this report.</p>
4.0	<p>Appendices – Documents Attached</p>
	<p>Appendix 1 – Request from the Department for Communities</p> <p>Appendix 2- Questionnaire with response</p>

This page is intentionally left blank



Department for

Communities

An Roinn

Pobal

Department fur

Commonities

www.communities-ni.gov.uk

Housing Division
Private Rented Branch
Level 3, Causeway Exchange
1-7 Bedford Street
Belfast
BT2 7EG
Phone: 028 905105259

01 December 2021

PRIVATE RENTED SECTOR IN NORTHERN IRELAND – NOTICE TO QUIT CONSULTATION DOCUMENT

Minister Hargey has today launched the above consultation which will run until 25 January 2022.

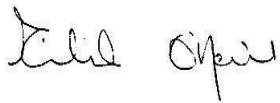
As a result of the Department's consultation on proposals to reform the private rented sector, legislation is being introduced to improve standards in the sector. One of the proposed improvements is to extend the notice to quit period a landlord must give a tenant.

This consultation seeks views on a number of options for the notice to quit period and you are invited to take this opportunity to respond to this document.

A copy of the consultation document can be accessed at the following link –

[Consultation on Notice to Quit | Department for Communities](#)

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Eilish O'Neill".A handwritten signature in cursive script, appearing to read "Conrad Murphy".

Eilish O'Neill & Conrad Murphy
Managers, Private Rented Branch

This page is intentionally left blank

ANNEX B

NOTICE TO QUIT CONSULTATION

Overview

The Private Tenancies Bill which is currently making its way through the NI Assembly contains a clause to increase the Notice to Quit period that a landlord is required to give a tenant to 8 weeks for tenancies lasting more than 12 months up to 10 years. It also amends the Notice to Quit that a tenant has to give to 4 weeks if the tenancy has not been in existence for more than 10 years and 12 weeks if more than 10 years.

The Department wants to test if 8 weeks is a sufficient timeframe to allow tenants (resident in their homes for more than a year) to find an affordable, suitable new home and has therefore included a range of alternative Notice to Quit options for you to consider.

Minister Hargey asked for some further research to be carried out on a range of Notice to Quit options and this work was recently completed by the Chartered Institute of Housing. This research has been summarised within the consultation document to provide additional context.

It is important to note that the draft Bill contains a provision which would allow the Notice to Quit to be amended in the future.

Why your views matter

The aim of the public consultation is to seek a comprehensive range of views and opinions which the Department can use to inform its' policy position on any extension to the Notice to Quit period.

The Department will consider the responses received and, following that, publish a consultation report on the Departmental website, which will set out an analysis of responses and the Department's next steps.

The information you provide in completing this survey will be controlled and processed in line with Data Protection Legislation by the Department. To find out more about how we handle your personal information, DfC's Privacy Notice can be viewed online at www.communities-ni.gov.uk/dfc-privacy-notice

In order to facilitate the survey, Citizen Space, which is not operated by DfC, is used as a data processor. Details of Citizen Space's privacy policy can be found online at www.delib.net/legal/privacy_policy

Further information

In responding to this consultation please do not submit any sensitive personal data or information. You are under no obligation to provide personal details in responding to this consultation.

We will only use your information for the purposes of analysis of feedback to this consultation.

Introduction

Please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation:

(Required)

- ☐ I am responding as an individual
- ☒ I am submitting an official response on behalf of an organisation

Responding as an individual

If you are responding as an individual, which of the following best describes your interest in the consultation? (please tick one)

(Required)

Please select only one item.

- ☐ I am interested from a tenant perspective
- ☐ I am interested from a landlord perspective
- ☐ Other (please specify in space below)

Responding on behalf of an organisation

If you are responding on behalf of an organisation, which of the following best describes your organisation? (please tick one option)

Please select only one item.

- ☐ Private Landlord
- ☐ Social Landlord
- ☐ Letting agent
- ☒ Local Government/Council
- ☐ A housing sector representative body
- ☐ Charity dealing with housing issues
- ☐ Other (please specify in space below)

--

Notice to Quit

In responding to the questions below, please try to support your response with facts, data, specific examples or other forms of evidence to substantiate your point of view.

The purpose of Notice to Quit

Either a tenant or a landlord may end a tenancy by giving a Notice to Quit. This provides time for the landlord to make arrangements to find a new tenant and gives the tenant time to find somewhere else to live. The usual length of a private tenancy Notice to Quit in Northern Ireland is the same for tenants and landlords although it is worth noting this was temporarily amended during the Covid emergency.

When a tenant gives Notice to Quit to a landlord it is normally because they have secured alternative accommodation whereas when a landlord gives a tenant a Notice to Quit that tenant then has to secure suitable affordable alternative accommodation which can be challenging in terms of supply and affordability. Therefore the Department considers that the Notice to Quit a landlord is required to give a tenant should be longer than the notice that a tenant is required to give.

The Department is particularly interested in views on the length of Notice to Quit that landlords should give to tenants.

1. Do you agree that the length of notices to quit for landlord and tenants should be different?
☒ Yes
☐ No

The Council would like to ensure that a tenant is given adequate notice so that they may find suitable alternate accommodation which can be difficult in the privately rented sector.

Use this box for further explanation if required:

That Notice to Quit should vary depending on the length of time in the tenancy

The Department considers that the longer a tenant has lived in a private tenancy the more disruption a Notice to Quit will cause as they try to secure suitable alternative accommodation.

2. Do you agree that Notices to Quit should vary depending on the length of the tenancy?

☒ Yes

☐ No

Use this box for further explanation if required:

Where a tenant has occupied a property for a significant period of time, they will have developed strong links to a particular area especially for children attending school and for those who require access to additional community or voluntary support.

The extended period of time will allow tenants more time to find suitable accommodation to meet their needs and individual circumstances.

Tenancies less than 12 months

The Department proposes to retain a 4 week Notice to Quit for tenancies of up to a year. There are various reasons for this, including:

- Most tenancies start with a one year contract, so while a Notice to Quit being issued is good practice, the end date of the tenancy is specified from the beginning. The statutory Notice to Quit only applies where there is no written contract or the contract does not contain a fixed term.
- Tenants require short term contracts for a variety of reasons, and these are required to be flexible. The Department does not want to overly constrain the supply of such tenancies, given the need for them.

3. Do you agree that the length of notice for shorter term tenancies of up to 12 months should remain at 4 weeks?

☐ Yes

☒ No

The Council supports the view that 12 month fixed term tenancies should be given more than 4 weeks notice to quit

If no, what length do you think it should be, and what information can you provide in support of this?

Tenancies from 12 months to 10 years in length

The Bill proposes an 8 week Notice to Quit for these tenancies, but it has been suggested that this still may be inadequate for tenants to find alternative suitable accommodation they can afford.

The Department is seeking views on any further extension to the 8 weeks' Notice to Quit contained in the Private Tenancies Bill and if extended whether any exemptions should apply.

4. What do you think the Notice to Quit period that a landlord will be required to give a tenant should be (where the tenancy is between 12 months and 10 years in length)?

- ☐ 8 weeks
- ☒ 12 weeks
- ☐ 6 months (26 weeks)
- ☐ Other

The temporary 12 week notice to quit period has been beneficial in protecting tenants during the pandemic and should be continued for these longer term tenants.

If other, please specify.

5. Do you think that there should be exemptions to this notice period?

- ☒ Yes
- ☐ No

If yes what should those exemptions be and what should the reduced Notice to Quit period be for those exemptions?

Exemption	Reduced Notice to Quit if this exemption applies
Specific grounds for Notice to Quit such as breach of legislation (eg: significant meter fraud, ASB conviction, significant damage to property.) or significant rear arrears	4 weeks

6. The Notice to Quit specified in legislation will apply across the Private Rented Sector, including to tenancies related to Houses in Multiple Occupation (HMO) properties.

Do you think the length of Notice to Quit for those tenants living in an HMO, or for exemptions to the Notice to Quit, should be different from that of other tenants in the Private Rented Sector?

- ☐ Yes
☒ No

6. The Council were advised by the Landlord Association for Northern Ireland and by several prominent landlords at its licensing committee meeting on the 16 December 2020, that HMO's accommodation provides affordable housing to a cross section of society, including: -

- homeless persons,
- single people on low incomes,
- victims of domestic abuse,
- people suffering with addictions,
- refugees,
- asylum seekers,
- young professionals, and
- students.

The Council supports the view that tenants of HMOs should be given at least the same legislative protection as other private rented tenants and the department may want to consider strengthening protection for vulnerable groups.

If so in what way?

This page is intentionally left blank



Subject:	Naming of New Park and Sportszone at Divis Back Path
Date:	7 th December 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Alison Allen, Neighbourhood Services Manager

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

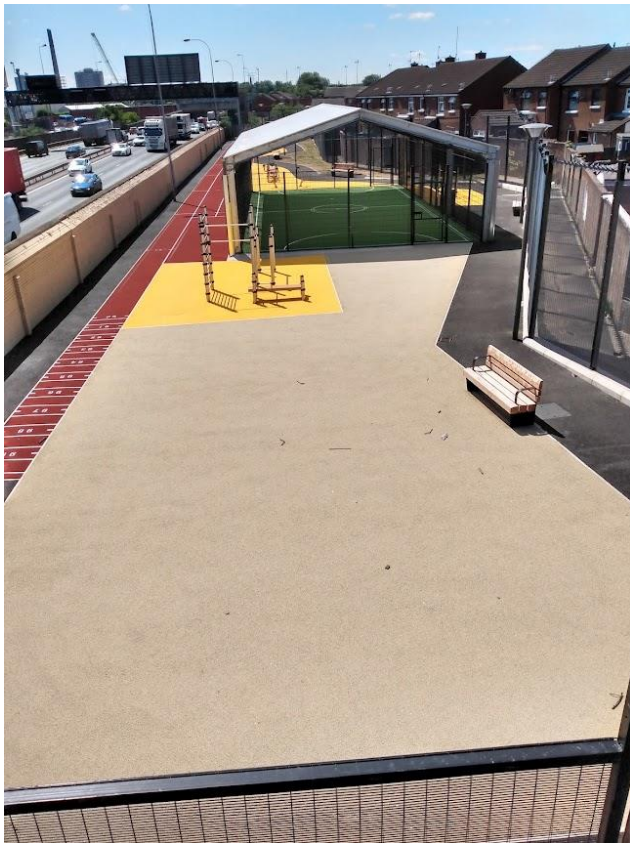
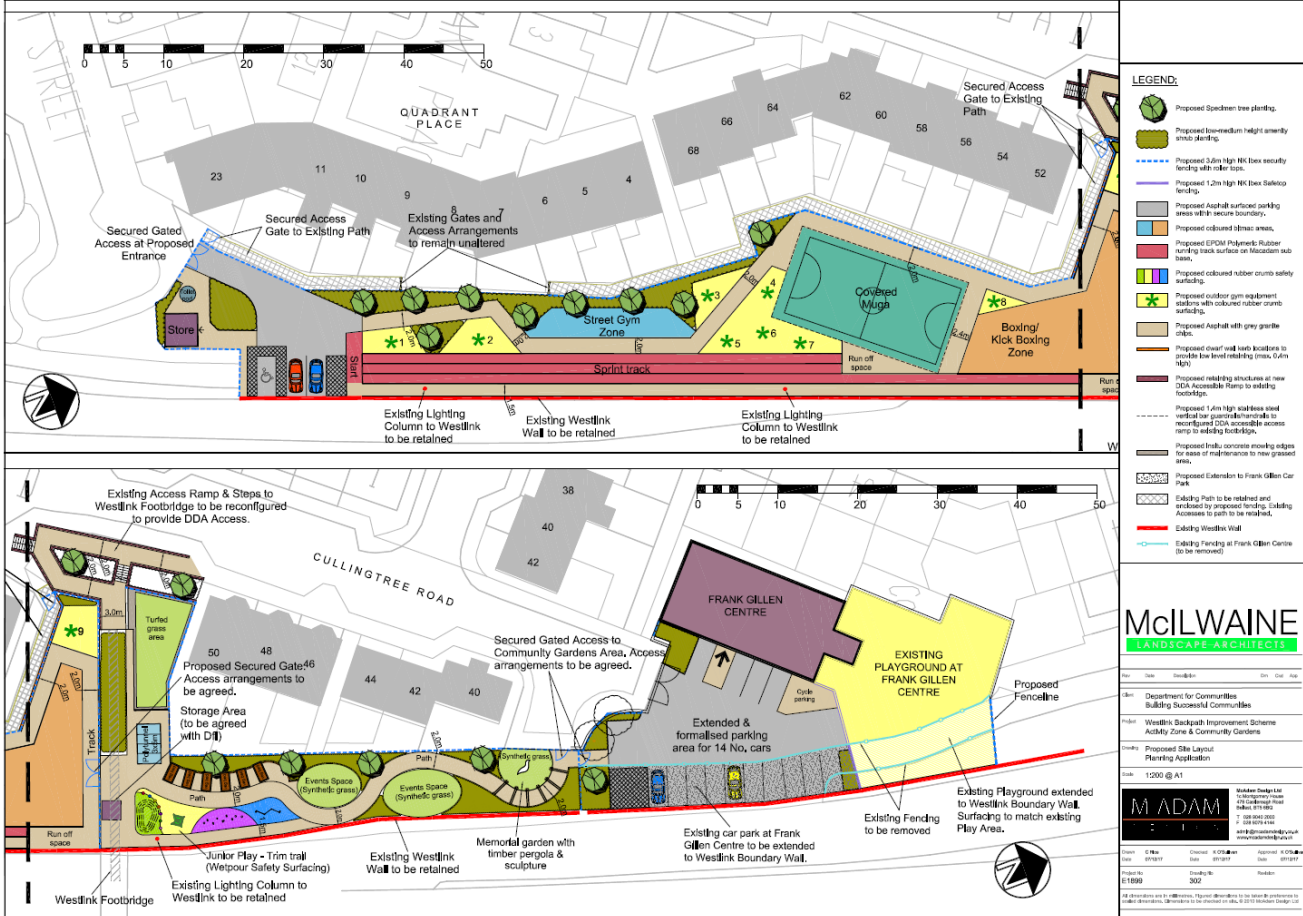
1.0	Purpose of Report
1.1	The purpose of the report is for Members to consider the naming process for the Divis Back Path development (funded by Department for Communities).
2.0	Recommendations
2.1	The Committee is asked to: <ul style="list-style-type: none"> - Approve the two options identified with local stakeholders to proceed to public consultation (Divis Back Path Park and Páirc an Lonnáin)
3.0	Main Report
3.1	<u>Background</u> Members are advised that the former Parks & Leisure Committee, at its meeting in August 2008 agreed a policy framework for managing requests to name parks.

3.2	<p>The policy follows a 4-stage process and has also previously been used to (re)name a bridge on the Connswater Community Greenway and Páirc Nua Chollann;</p> <ul style="list-style-type: none"> Engagement with key stakeholders to develop a long list of new park names, which reflect; <ul style="list-style-type: none"> a sense of place, reflecting the geographic location, community, neighbourhood or street where the park, facility or amenity is located. the historical significance of the area or reflects unique characteristics of the site (unique flora / fauna). Shortlisted names based on stakeholder feedback and assessed against the policy criteria as outlined above; Community consultation on the agreed shortlisted names; Recommendation to People & Communities Committee to reflect preferred name identified via the community consultation.
3.3	<p>Names will not be considered which:</p> <ul style="list-style-type: none"> Cause confusion due to duplication or names sounding similar to existing named facilities/locations within the City. Unlawfully discriminate within the meaning and scope of the provisions of Section 75, the Good Relations Plan (2007) and the Shared Future agenda. Are party-political in intention or use. <p><u>Divis “Back Path” Naming Process</u></p>
3.4	<p>The Westlink Sports Activity Park (which was its working title for funding purposes) is situated at the Divis “Back Path” area located between the rear of Cullingtree Road and the Westlink. It stretches from Devonshire Place, near Grosvenor Road to land adjacent to the Frank Gillen Centre, near Divis Street. It was opened to the public in early July 2021 following a major £1m development, creating a valuable new asset for residents in this part of the west of the city.</p>
3.5	<p>The area, which had previously experienced a high level of anti-social behaviour has been transformed by the new park through a Department for Communities (DfC) Building</p>

	<p>Successful Communities project which includes new fencing and surfacing, a MUGA, gym equipment, sprint tracks and play equipment. There is also a play area, raised beds, seating and a community garden and improved footbridge and access ramp across the Westlink.</p>
3.6	<p>In line with the policy framework, local stakeholders have come together to develop a list of potential names for Divis “Back Path” and a panel (including nominated members of the “Back Path” Forum which was the local reference group for the development) have considered the submissions against the criteria in the Council’s policy framework.</p>
3.7	<p>Engagement took place via local meetings with Youth Organisations, Healthy Living Centres, Churches, Community Groups and Sporting Organisations. Suggestions were put forward by the groups after they received information around the site and its historical background. A range of three potential names were discussed with following agreed for consultation in line with Council policy:</p> <ol style="list-style-type: none"> 1. Nuggets Nest – this was suggested to acknowledge the work carried out by Gerry “Nugget” Nugent who has volunteered in the community, particularly Immaculata Amateur Boxing Club, for over 45 years. However, naming the park after a living individual would not comply with the criteria of the naming policy. 2. Divis Back Path – This site was always referred to as “Divis Back Path” and people associate the location with the name. 3. Páirc an Lonnáin (Loney Park) – this is most popular among local groups given the historical context of the site which was the location of the old Pound Loney. Many people still living in the area are originally from the Loney.
3.8	<p>The outcome of this is that the initial, agreed options to proceed to public consultation are:</p> <ul style="list-style-type: none"> - Divis Back Path Park - Páirc an Lonnáin
3.9	<p>In line with the Council’s naming policy framework, Committee approval is now being sought to carry out a full public consultation using the Council’s Citizenspace around these naming options. The results of this consultation will then be brought back to Committee seeking approval to select the final name of the park.</p>

3.10	It is expected that final recommendations on the official name for Divis Back Path development will be tabled for consideration again at People and Communities Committee Spring 2022.
3.11	<p>Financial & Resource Implications</p> <p>There are no financial or resource implications beyond the CNS departmental budget already in place.</p> <p>Equality or Good Relations Implications/Rural Needs Assessment</p>
3.12	The naming process followed will be in line with the Council's naming policy and the chosen name will be screened in line with the Council's equality process.
4.0	Appendices – Documents Attached
	Appendix 1: New Park and Sportzone at Divis Back Path – Layout and Images

Appendix 1: New Park and Sportszone at Divis Back Path – Layout and Images



This page is intentionally left blank



Subject:	Stadia Community Benefits Initiative
Date:	7 December 2021
Reporting Officer:	Ryan Black, Director Neighbourhood Services
Contact Officer:	Cormac McCann, Lead Officer Community Provision

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	To advise Committee of progress with the Stadia Community Benefits Initiative (SCBI) and update on the action plan.
2.0	Recommendations
2.1	The Committee is asked to: <ul style="list-style-type: none"> Note progress to date.
3.0	Main report
3.1	The Council has been undertaking the Leisure Transformation Programme to renew its Leisure facilities across the City. This Programme has been influenced by the Partnership opportunities presented by the NI Executive Stadia Programme.


3.2	The Council, Department for Communities (DfC) and the Irish Football Association (IFA) have recognised the opportunities presented by the Stadia Programme, have committed to work together to maximise these benefits, and have agreed to establish a Stadium Community Benefits Initiative as part of the Belfast Community Benefits Initiative ('the Project') to implement and deliver agreed objectives including promoting equality, tackling poverty, and tackling social exclusion within the Belfast area.
3.3	In March 2016 the Council, DfC and IFA signed an agreement which sets out their respective commitments to the project. As other major stadia are developed in Belfast it is anticipated that other sports governing bodies shall become parties to the agreement. At its April 2018 meeting People and Communities committee agreed that Council would work with the Gaelic Athletic Association (GAA) within the Stadia Community Benefits Initiative and recognised their significant planned investment in gaelic games in the city to support their Gaelfast strategy. GAA activities became fully incorporated into the action plan at the start of financial year 2019-2020, with Gaelfast staff imbedded into the governance structure at Communications Board, Delivery Board, Policy and Performance Board.
3.4	The agreement is for a period of ten years with financial commitment from Council and IFA in place to the end of March 2026. Delivery is managed through monthly meetings of the Delivery Board, which reports quarterly to the Policy and Performance Board. Financial and performance reports will be presented to Council and other partners' Boards as necessary. Formal review of the agreement will be carried out in this financial year in accordance with the requirements to review at years 5 and 10.
3.5	<p>The Policy & Performance Group is responsible for agreeing the Benefits Realisation Plan and associated annual targets. Work was undertaken to ensure the end benefits/outcomes are aligned to partners' strategies. To measure the progress of this the Council and the IFA have developed a range of indicators/intermediate benefits which are monitored through programme delivery:</p> <ul style="list-style-type: none"> a. Number of coaching sessions provided b. Number of coaches engaged in delivering coaching c. Number of sessions improving club governance d. Number of volunteering opportunities e. Participation opportunities for under 16s f. Female participation rates g. Number of people completing skills development programme i. Number of sessions for under-represented groups

	<p>j. Number of sessions for school and youth groups</p> <p>k. Community group usage of stadia</p> <p>l. Number of clubs attaining club-mark</p> <p>m. Educational opportunities</p> <p>o. Number of programmes targeting ASB</p> <p>q. Improved collaborative working</p> <p>r. Number of disabled participants</p> <p>s. Number of older people participating</p>
3.6	<p>Following the completion of a baseline assessment in early 2017, annual work-plans are developed each year. The 2021 – 2022 action plan was developed with a view to delivering a majority of activities using online methods in Q1 and Q2, with increased direct delivery in Q3 & Q4. The action plan for 2021 – 2022 includes a mixture of sports specific programmes (e.g. National Governing Body specific coach education) and some joint collaborative initiatives delivered by both sporting codes.</p>
3.7	<p><u>Performance</u></p> <p>Programme delivery to date in year 5 (financial year 2021/2022) has been successful. Effective advance planning has mitigated covid restrictions and no planned initiatives were postponed during Q1 & Q2. Details of the IFA and GAA specific activities are included at appendix 1 and appendix 2. Joint initiatives are planned for Q3 and Q4 and include sports nutrition courses, club funding, female coaching, club ethos, mental health first aid, collaborative delivery in schools.</p>
3.8	<p><u>Financial Implications</u></p> <p>In accordance with the Council's obligations under its DfC Funding Agreement for the Olympia Regeneration Project, the Council has committed a sum of £100,000 per annum for a minimum of ten years, so that a minimum of £1,000,000 is contributed in total to the Project.</p>
3.9	<p><u>Equality Impact/Rural Needs Assessment</u></p> <p>There are no additional impacts related to this report.</p>
4.0	Appendices – Documents Attached
	<p>Appendix 1. Performance Report from IFA as approved by the Joint Policy and Performance Board on 1 November 2021.</p>

	Appendix 2. Performance Report from GAA as approved by the Joint Policy and Performance Board on 1 November 2021.
--	---

	Highlights (key contributors)	TOTAL
a. Number of coaching sessions provided	Female Mentor Programme	264
b. Number of coaches engaged in delivering coaching	Coach Education and mentoring	31
c. Number of sessions improving club governance		0
d. Number of volunteering opportunities	Street Soccer Outreach Female Mentor Programme	44
e. Participation opportunities for under 16s	Female Mentor Programme	327
f. Female participation rates	Female Mentor Prog. Safeguarding	357
g. Number of people completing skills development programme	Safeguarding – 217 participants Female Mentor Programme – 20 participants NCC Level 1	282
i. Number of sessions for under-represented groups	Female Mentor Programme	88
j. Number of sessions for school and youth groups		175
k. Community group usage of stadia	Not possible with Covid restrictions.	0
l. Number of clubs attaining club-mark		0
m. Educational opportunities	NCC Level 1	33
o. Number of programmes targeting ASB	Street Soccer Outreach	6
q. Improved collaborative working	Female Mentor Programme Street Soccer Outreach	24
r. Number of disabled participants	Street Soccer Outreach	2
s. Number of older people participating	Coach ed and safeguarding	16

This page is intentionally left blank

SCBI Performance Report_GAA_2021-2022			
ACTUAL Q2 Year to date			
Intermediate Benefits	Highlights (key contributors)	YTD TOTAL	
a. Number of coaching sessions provided	Summer Camps	276	
	Super Games		
b. Number of coaches engaged in delivering coaching	Summer Camps	115	
c. Number of sessions improving club governance		2	
d. Number of volunteering opportunities	Summer Camps	40	
e. Participation opportunities for under 16s	Super Games	5054	
	Summer Camps		
f. Female participation rates	Summer Camps	795	
g. Number of people completing skills development programme		25	
i. Number of sessions for under-represented groups		Summer Camps	60
	ADAPt		
j. Number of sessions for school and youth groups	Super Games	195	
k. Community group usage of stadia		0	
l. Number of clubs attaining club-mark		0	
m. Educational opportunities		25	
o. Number of programmes targeting ASB		2	
q. Improved collaborative working	All projects	14	
r. Number of disabled participants	ADAPt	100	
s. Number of older people participating		0	

This page is intentionally left blank



Subject:	Partner Agreements Update
Date:	7 December 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Cormac McCann, Lead Officer Community Provision

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Some time in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	This report is to provide an update on progress on implementation of Partner Agreements for July-September 2021.
2.0	Recommendations
2.1	The Committee is asked to: <ul style="list-style-type: none"> Note the progress to date at Partner Agreement sites.
3.0	Main report
	Legal Agreements
3.1	Council agreed to enter into Partner Agreements at the following sites with the clubs identified below. The Agreements are for a period of 5 years with option to extend for up to a further two years. The Department has extended all of the Agreements beyond the initial 5 year period and up to March 2022.

3.2	<table border="1"> <thead> <tr> <th>Location</th><th>Partner</th></tr> </thead> <tbody> <tr> <td>Dixon Playing Fields</td><td>Sirocco Works FC</td></tr> <tr> <td>Alderman Tommy Patton Memorial Park</td><td>East Belfast FC</td></tr> <tr> <td>Woodlands Playing Fields</td><td>Co. Antrim Board GAA</td></tr> <tr> <td>Loughside Playing Fields</td><td>Loughside FC</td></tr> <tr> <td>Shore Road Playing Fields</td><td>Grove United FC</td></tr> <tr> <td>Orangefield Playing Fields</td><td>Bloomfield FC</td></tr> <tr> <td>Ulidia Playing Fields</td><td>Rosario FC</td></tr> </tbody> </table>	Location	Partner	Dixon Playing Fields	Sirocco Works FC	Alderman Tommy Patton Memorial Park	East Belfast FC	Woodlands Playing Fields	Co. Antrim Board GAA	Loughside Playing Fields	Loughside FC	Shore Road Playing Fields	Grove United FC	Orangefield Playing Fields	Bloomfield FC	Ulidia Playing Fields	Rosario FC
Location	Partner																
Dixon Playing Fields	Sirocco Works FC																
Alderman Tommy Patton Memorial Park	East Belfast FC																
Woodlands Playing Fields	Co. Antrim Board GAA																
Loughside Playing Fields	Loughside FC																
Shore Road Playing Fields	Grove United FC																
Orangefield Playing Fields	Bloomfield FC																
Ulidia Playing Fields	Rosario FC																
3.3	<p>Regular checks on the necessary Insurance, Health and Safety and Governance have been completed at all sites. The reporting documents were amended in accordance with audit requirements and sent to partners one month in advance of reporting deadlines.</p> <p>All partners are compliant on these matters.</p>																
3.4	<p>Financial Support to deliver Sports Development Plans</p> <p>Successful applicants submitted their plans in early 2021 to improve sports development outcomes at each site in the 2021 – 2022 financial year. Funding of up to £20,000 per annum is available for each partner to deliver a programme supporting their Sports Development Plan. Letters of offer to all partners are based on approved sports development plans for the financial year. Partners must submit Sports Development plans annually which are aligned to the financial planning calendar for the incoming year.</p>																
3.5	<p>Monitoring</p> <p>Given the current Covid19 restrictions the usual end of quarter monitoring meetings have not been held face to face with partners. However parks management and sports development have kept in contact via phone calls for updates on site management and bookings, health and safety, finance and their sports development plan. Action plans are reviewed and agreed with the partners during these discussions to ensure that planned outcomes are achieved and improvements identified where required.</p>																
3.6	<p>Sports Development Impact</p> <p>In line with Council objectives, the diversification of use and improved sports development impact are priorities at the partner agreement sites. Programme delivery has led to significant positive achievements across the sites despite the Covid19 restrictions.</p>																

The table below indicates outputs at the sites as reported by the 7 partners for Quarter 2 (July-September) 2021/22.

A. Participation type	
1. Members of different codes	3455 people
2. People with a Disability	44 people
3. People from a minority ethnic background	2787 people
4. Females	5850 people
5. Older people	1853 people
6. Schools / youth organisations	7 schools /groups
B. Participation usage	
Number of full pitch/adult matches on site	197 matches
Number of full pitch/adult match participations	2734 users
Number of small sided/youth match bookings on site	126 bookings
Number of small sided/youth matches on site	332 matches
Number of youth match participations	6554 users
Number of training sessions held on site	556 sessions
Number of training session participants	31,380 participants
Number of other bookings / activities on site	29 bookings
Number of other bookings/activity participants on site	1500 participants
C. Partnership working	
1. Working with Belfast City Council	All reported partnership working
2. Sports Governing Bodies	15 engaged
3. Other teams / groups in your sport	15 teams / groups
4. Other teams / groups in different sports	6 teams / groups
5. Community / voluntary groups	8 community groups
D. Social value	
1. Young people at risk	1285 people
2. Encourage participation of under- represented groups	3048 people

	<div>3. Promote positive cross community relations543 people</div> <div>4. Promote health and wellbeing in socially deprived communities6427 people</div> <div>5. Promote Volunteering skills58 people</div> <div>6. Develop skills that will improve employability49 people</div>
	<div><u>Financial & Resource Implications</u></div> <div>3.7 A total of £140,000 per annum is available within revenue estimates to support annual Sports Development Plans at the Partner Agreement sites.</div> <div><u>Equality or Good Relations Implications/Rural Needs Assessment</u></div> <div>3.8 None.</div>
4.0	Appendices – Documents Attached
	None



Subject:	Management of Clarendon Playing Fields
Date:	7 December 2021
Reporting Officer:	Ryan Black, Director of Neighbourhood Services
Contact Officer:	Cormac McCann, Lead Officer Community Provision

Restricted Reports

Is this report restricted?

Yes

☐

No

☒

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Some time in the future

Never

☐
☐
☐
☐

Call-in

Is the decision eligible for Call-in?

Yes

☒

No

☐

1.0	Purpose of Report or Summary of main Issues
1.1	To request members approval to proposed changes to the legal agreements affecting Clarendon Playing Fields.
1.2	To seek permission to update previous committee approvals regarding Clarendon Playing Fields as set out below.
2.0	Recommendations
2.1	<p>The Committee is asked to approve:</p> <ul style="list-style-type: none"> the variation of the current Facility Management Agreement dated 1st October 2005 and associated Assignment and Variation dated 2nd June 2008 (the Agreement) to effect transfer of the interest thereunder from Clarendon Development Association, incorporated, (CDA Inc.) to Clarendon Development Association, unincorporated,

	<p>(CDA Uninc.) and that the Agreement would run on a month to month basis (as previously agreed by this Committee on 13th October 2015).</p> <ul style="list-style-type: none"> the grant of a 10 year licence to CDA Uninc. for the siting of a portable building at Clarendon Playing Fields, as per the terms of this Committee approval of 13th October 2015 (note the said Committee previously approved grant of the said Licence to CDA Inc.
3.0	Main report
	<u>Key Issues</u>
3.1	<p>The Council entered into a 10 year Facility Management Agreement with Clarendon Development Association in October 2005 and in June 2008 the Facility Management Agreement was varied to:-</p> <ul style="list-style-type: none"> take account of Clarendon Development Association having registered at Companies House as a company limited by guarantee; amend clause 3.1 of the Agreement regarding the term; and amend the 1st Schedule of the Agreement relating to the description of the playing facilities.
3.2	<p>When the Agreement reached its termination date in 2015, approval was granted for a month to month extension by this Committee on 13th October 2015 whilst the future management of the asset was considered.</p>
3.3	<p>In May 2017 this Committee approved the termination of the Agreement and, based on the proven track record of community benefit delivered by CDA Inc. at Clarendon Playing Fields, Committee authorised a preferential use agreement for Clarendon Playing Fields to CDA Inc. Community outreach work was to be delivered from the portable building supplied and maintained by CDA Inc. at Clarendon Playing Fields with the grant of a 10 year licence with retrospective approval by Strategic Policy and Resources Committee in November 2017 (the portable building having already been installed at Clarendon Playing Fields by CDA Inc. with planning approval granted in March of that year).</p>
3.4	<p>Negotiations between CDA Inc. and Community & Neighbourhood Service Officers regarding the termination of the Agreement and a move to a preferential use agreement were protracted. The Agreement was never formally terminated and a preferential use agreement was subsequently never entered into.</p>

3.5	The proposed licence for the portable building was also never put in place although CDA Inc. continued to deliver services from it and in March 2020 Council was advised the governance arrangements for CDA Inc. had changed in October 2018 from incorporated to unincorporated and that CDA Uninc. were delivering the said services since October 2018.
3.6	This change has caused delay in issuing the quarterly Agreement payments whilst Community & Neighbourhood Service Officers worked through necessary due diligence assessments for CDA Uninc. That due diligence has been completed to the satisfaction of Community & Neighbourhood Service Officers.
3.7	Members will be aware that Clarendon Playing Fields is one of the sites identified by this Committee to explore pilot community asset transfer arrangements. In the coming months Officers of CNS will be working with Clarendon Development Association (unincorporated) as the current site manager to develop: <ul style="list-style-type: none"> • A community benefits realisation plan • A business case to demonstrate the organisations long term sustainability • Recommended mechanism for of the transfer of the asset to community management assessed against the draft framework.
3.8	Community & Neighbourhood Service Officers are therefore seeking Members approval to transfer the interest falling under the Agreement to CDA Uninc. and to enter into a licence with CDA Uninc. for the siting of the portable building on Council lands at Clarendon Playing Fields as set out above. <u>Financial & Resource Implications</u>
3.9	All costs for the portable building and otherwise associated with this report shall be met by CDA Uninc..
3.10	CDA Uninc. shall pay a licence fee of £375 per annum to Council for the licence of the land on which the portable building is sited at Clarendon Playing Fields.
3.11	City and Neighbourhood Services will recommence payments aligned to provision of services under the terms of the Agreement, the payments being allocated from the relevant revenue budget, when the transfer of the Agreement to CDA Uninc. has been completed, in accordance with this Report to the the satisfaction of Legal Services.

3.12	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> None associated with this report.
4.0	Appendices- Documents Attached
	None



Subject:	Update on Pest Control Service
Date:	7 December 2021
Reporting Officer:	Siobhan Toland, Director of City Services
Contact Officer:	Aoife Moody, City Protection Manager

Restricted Reports	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If Yes, when will the report become unrestricted?	
After Committee Decision	<input type="checkbox"/>
After Council Decision	<input type="checkbox"/>
Sometime in the future	<input type="checkbox"/>
Never	<input type="checkbox"/>

Call-in	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

1.0	Purpose of Report or Summary of main Issues
1.1	This report provides an update on Pest Control services following the Committee update and recommended actions of the 7 th September 2021.
2.0	Recommendations
2.1	The Committee are asked to <ul style="list-style-type: none"> Note the update report on the current position for pest control services and the resumption of pest control services for NIHE & all housing associations.
3.0	Main report
3.1	Following the update on Pest control services on September 7th to Council members, it was agreed that pest control services would resume to all tenures. It was also requested by members that officers would investigate the establishment of a Service Level Agreement (SLA) with both the NIHE and Housing Associations with a view to the Council discussing the opportunity of recouping the costs for these services.

3.2	On the 14 th September the BCC Chief Executive received correspondence from Minister Hargey, Department for Communities raising concerns about our restricted Pest Control services for NI Housing Executive and Housing Associations. A response was sent to the Minister on September 15 th (Appendix 1) indicating that as agreed by members pest control services would resume to all tenures and that we would explore the establishment of a Service Level Agreement (SLA) with both the NIHE and Housing Associations with a view to the Council discussing the opportunity of recouping the costs for these services.
3.3	At the request of members, the Operational Director wrote to the Regional Manager of the NI Housing Executive and all Housing Associations on October 6 th advising them that services would resume and that we would welcome a meeting to discuss a Service Level Agreement between both parties. Copy of letter in Appendix 2.
3.4	Services subsequently resumed in early October for all tenures and our business support team were instructed to accept all service requests for public health pests including rats and mice.
3.5	A meeting was arranged with the NI Housing Executive to explore the option of an SLA and discussing the opportunity of recouping of costs. This meeting took place on 16 th November. At this meeting NI Housing Executive (NIHE) shared their concerns about ensuring equity across all constituents and tenures allowing access to BCC pest control services free of charge. They advised that are they have approximately 30,600 properties in the Belfast City Council area and pay 100% rates on all their properties whether occupied or void. They officers expressed the need to ensure their tenants should be entitled to benefit from the Councils free public health pest control services. They also highlighted that they had been using their own contractor for Pest Control for the last 18 months absorbing this cost directly. Their service requests totalled approximately 1400 over the period of September 2020 to 2021 which was significantly more than a normal pre Covid year due to in their view the reduced provision of our services.
3.6	Since the last update to members in September our waiting time for an appointment for an internal treatment or sewer baiting treatment is approximately 3 weeks. The impact of the pandemic generally and within the front line services continues to challenge our resumption of the operational services to pre pandemic service standards. We are also in the process of recruiting for some vacancies which in turn has reduced the overall capacity of the team. We expect that in the coming weeks our waiting times will increase significantly as referrals

	fully resume for Housing Associations and NI Housing Executive. We will continue to monitor this very closely.
3.7	Finally, in light of discussions with the NIHE and taking account of issues of equality for all BCC residents, the issue of cost recovery for the pest control services would clearly need to be considered across all sectors at a future point.
3.8	<p>Financial & Resource Implications</p> <p>There are no additional financial implications associated with this report.</p> <p>The Council continues to provide the service free of charge</p> <p>Equality or Good Relations Implications/Rural Needs Assessment</p>
3.9	There are no implications associated with this report
4.0	Appendices – Documents Attached
	<p>Appendix 1 – Letter to Minister Hargey</p> <p>Appendix 2 - Letter to Northern Ireland Housing Executive</p>

This page is intentionally left blank



Your reference

Our reference SW/lc

Date 15 September 2021

Minister Hargey MLA
Department of the Communities
Causeway Exchange
1-7 Bedford Street
BELFAST
BT2 7EG

Dear Minister Hargey

Pest control services and social housing tenants

I acknowledge your correspondence of 14 September 2021 in relation to the provision of Pest Control services by Belfast City Council.

I would like to advise you that the restricted service was always to be kept under review. This was a pragmatic decision made whilst trying to recover the service in June 2021 after it had been suspended. I would note that the NIHE and the Housing Associations have managed to deliver Pest Control services, via their contractors, throughout the pandemic when there was no service being provided by Belfast City Council.

Since then, the Council's People and Communities Committee has asked officers to plan towards returning the Pest Control Service to the wider tenure and requested, that officers engage in discussions with NIHE and Housing Associations around establishing a service level agreement to include a cost recovery or recharging arrangement that may assist better service delivery for all parties involved. We would also emphasise that when we return the service requests for all tenures, we will continue to operate under restricted covid control conditions and that unfortunately, we do anticipate longer waiting times for pest treatment appointments.

We would welcome the opportunity to meet with NIHE to discuss this matter in early October and my officers will be in touch to arrange.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Suzanne Wylie', followed by a large, stylized flourish.

Suzanne Wylie
Chief Executive

Belfast City Council, Office of the Chief Executive
City Hall, Belfast BT1 5GS
Tel: 028 9027 0202, Textphone: 028 9027 0405
Email: wylies@belfastcity.gov.uk

This page is intentionally left blank



Our ref: N/A

Your ref: N/A

Date: 6th October 2021

Jennifer Hawthorne
Regional Manager for Belfast
NIHE
1-11 May Street
Belfast, BT1 4 NA

Via email: jennifer.hawthorne@nihe.gov.uk

Dear Jennifer

RE: PEST CONTROL SERVICES

Thank you for your letter dated 22nd July 2021 in response to our letter to the Chief Executive, Grania Long, dated 15th June 2021 in respect of the provision of Pest Control services.

At the meeting of the People and Communities Committee on 7th September 2021, the elected members agreed to the resumption of Pest Control services to all tenures and to investigate the establishment of a Service Level Agreement (SLA) with both the NIHE and Housing Associations with a view to the Council recouping the costs for these services. This decision was ratified by the Council on 4th October 2021.

Given that there are ongoing recovery challenges within this service and existing waiting times to receive a date for an appointment, we envisage there may be an even longer waiting time for an appointment for these treatments to be carried out, so we will still be recommending to all customers that they contact their housing provider, in case the matter can be expedited by the housing provider.

The Council would welcome a meeting at the earliest opportunity to discuss the possibility of setting up a service level agreement with your organisation in respect of Pest Control services, and I would be grateful if you could contact Vivienne Donnelly, City Protection Manager (email: donnellyv@belfastcity.gov.uk) to arrange a suitable time and date. This meeting could be facilitated online if that is more convenient for your organisation.

Please do not hesitate to contact me if you have any queries.

Yours sincerely

A handwritten signature in black ink that reads 'Siobhan Toland'.

Siobhan Toland M.Sc., F.C.I.E.H
Director of City Services

Belfast City Council, City and Neighbourhood Services Department
The Cecil Ward Building, 4-10 Linenhall Street, Belfast BT2 8BP: Tel: 028 9027 0428
Text Telephone Facility for People who are Deaf or Hearing Impaired: 028 9027 0405
Email: tolands@belfastcity.gov.uk

This page is intentionally left blank