

# Public Document Pack

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

6th August, 2025

## **MEETING OF CLIMATE AND CITY RESILIENCE COMMITTEE**

Dear Alderman/Councillor,

In addition to those matters previously notified to you, the following item(s) will also be considered at the meeting to be held at 5.15 pm on Thursday, 7th August, 2025.

Yours faithfully,

JOHN WALSH

Chief Executive

### **AGENDA:**

3. **Response to the draft Third Northern Ireland Climate Change Adaptation Programme (NICCAP3) 2024-2029 (Pages 1 - 14)**

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<b>Subject:</b>	NI Climate Change Adaptation Programme (NICCAP) 3 2024-2029
<b>Date:</b>	7 <sup>th</sup> August, 2025
<b>Reporting Officer:</b>	John Tully, Director Organisational and City Strategy
<b>Contact Officers:</b>	Debbie Caldwell, Belfast Climate Commissioner Mura Quigley, Adaptation and Resilience Advisor

<b>Restricted Reports</b>	
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"/>

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

<b>1.0</b>	<b>Purpose of Report/Summary of Main Issues</b>
1.1	The purpose of this report is to inform members about the recent public consultation on the Draft NI Climate Change Adaptation Programme 2024-2029
<b>2.0</b>	<b>Recommendation</b>
2.1	The Committee is requested to: <ul style="list-style-type: none"> <li>I. Note that the NI Climate Change Adaptation Programme has been drafted and refers to a series of climate risks for Northern Ireland based on the UK Climate Change Risk Assessment 2022.</li> <li>II. Note that the current Programme out for consultation identifies a range of actions to be carried out by local government up to 2029.</li> <li>III. Retrospectively approve the response that was submitted by Belfast City Council to the Public Consultation which closed on 4<sup>th</sup> August 2025.</li> </ul>

	IV. Agree that further discussion and engagement should be requested with DAERA on the actions to understand the resource implications of these on the Council before they can be agreed and adopted.
<b>3.0</b>	<b>Main Report</b>
<b>3.1</b>	<p><b>Background</b></p> <p>The Climate Change Act 2008 places a statutory duty on Northern Ireland Executive Departments to lay programmes before the Northern Ireland Assembly, which set out their objectives, policies, proposals and timelines for introducing those policies and proposals in response to the most recent UK Climate Change Risk Assessment (CCRA) which was published in January 2022.</p> <p>To fulfil this legal requirement the Department of Agriculture, Environment and Rural Affairs (DAERA) has led on the development of a series of single coordinated adaptation programmes, which are known as the Northern Ireland Climate Change Adaptation Programme (NICCAP), since the 2008 Act came into effect.</p> <p>The recent public consultation, which opened on 9 June 2025 and closed on 4<sup>th</sup> August 2025 sought the views of stakeholders on the draft third iteration of these programmes (NICCAP3) which has been developed with input from all Departments and a range of key stakeholders, in response to the latest Third UK Climate Change Risk Assessment (CCRA3).</p> <p>The Climate Change Committee are obligated under section 57 of the 2008 Act to produce an Independent Climate Change Risk Assessment (CCRA-IA) on a five yearly cycle, which is used to inform the development of the UK Climate Change Risk Assessment (CCRA) which must be laid in Parliament every five years under section 56.</p> <p>Section 60 of the Act provides for Northern Ireland Departments to respond to each CCRA through an adaptation programme setting out:</p> <ul style="list-style-type: none"> <li>- the objectives of the department in relation to adaptation to climate change,</li> <li>- the department's proposals and policies for meeting those objectives, and</li> <li>- the timescales for introducing those proposals and policies.</li> </ul> <p>Effective climate change adaptation action requires a collaborative approach and so in recognition of this, DAERA has led on the development of a coordinated Northern Ireland Climate Change Adaptation Programme (NICCAP) with the input of adaptation responses from across each of the NI Executive Departments.</p> <p>The consultation document states that it also recognises the important role that key stakeholders including Local Government, academia, Non-Government Organisations (NGOs) and businesses can play in creating a climate resilient Northern Ireland, and in acknowledgement of this, they have also included an extensive range of actions from outside of Departments in the NICCAP3 Adaptation Delivery Plan.</p>
<b>3.2</b>	<p><b>What is in NICCAP 3?</b></p> <p>Part 1 provides information on the legislative context for NICCAP3 and details on the consultation itself including how to respond as well as a short introduction to the two main responses to climate change:</p> <ul style="list-style-type: none"> <li>- Mitigation</li> </ul> <p>Climate change mitigation refers to actions or activities that limit emissions of greenhouse gases (GHGs) from entering the atmosphere and/or reduce their levels in the atmosphere. •</p> <ul style="list-style-type: none"> <li>- Adaptation</li> </ul> <p>Climate adaptation means taking action to prepare for and adjust to the current and projected impacts of climate change.</p>

	<p>Part 2 covers NICCAP3 itself including how DAERA has chosen to structure it and why it provides detail on each of the Key Areas within NICCAP3 which cover 5 key areas of sectoral impact as follows:</p> <ul style="list-style-type: none"> <li>- Natural Capital;</li> <li>- Food Security;</li> <li>- Infrastructure Services;</li> <li>- People and the Built Environment; and</li> <li>- Disruption to Business and Supply Chains.</li> </ul> <p>This chapter also provides details on the statutory and best practice impact assessments which were carried out on the draft NICCAP3.</p> <p>Part 3 provides details on the next steps, following the close of the consultation, including information on the confidentiality of responses to the consultation, as well as on Data Protection and Freedom of Information consideration.</p>
<b>3.3</b>	<p><b>Actions relating to Belfast City Council</b></p> <p>There are 28 actions identified in the programme that are either owned by the Council, councils are required to support delivery of, or they are referenced in the programme description.</p> <p>As part of our participation on the Local Government Climate Action Network (LGCAN), the following ongoing projects were highlighted and input into the programme:</p> <ul style="list-style-type: none"> <li>- The Belfast Tree Strategy</li> <li>- The Belfast Sustainable Food Strategy</li> <li>- Preparation of a Climate Change Risk Assessment, Action Plan and Investment Framework</li> </ul> <p>As well as that, the Council is listed as partners on the following initiatives:</p> <ul style="list-style-type: none"> <li>- Greening the City (Belfast Healthy Cities)</li> <li>- Regional Coordination of Adaptation (Climate NI)</li> <li>- UPSURGE (QUB)</li> <li>- SPACE (QUB)</li> </ul> <p>Other actions that have an impact on Council programmes and operations include:</p> <ul style="list-style-type: none"> <li>- NI Priority Species List (DAERA)</li> <li>- NI Historic Environment Policy (DfC)</li> <li>- Living with Water in Belfast Plan (DfI)</li> <li>- The Eastern Transport Plan (DfI)</li> <li>- The Connswater Community Greenway (Eastside Partnership)</li> <li>- NILGA Elected Member Development Programme (NILGA)</li> <li>- TalX 2 (University College Cork)</li> </ul> <p>Actions relating to our Emergency Planning functions are:</p> <ul style="list-style-type: none"> <li>- Severe Weather Debriefing (RCRG)</li> <li>- NI Civil Contingencies Framework (TEO)</li> <li>- Continued working by RCRG with communities impacted by flooding</li> </ul>

3.4	<p><b>Actions Endorsed by SOLACE/NILGA</b></p> <p>There are 11 actions that the Council is required to deliver on that were endorsed by SOLACE in 2024. Some of these are on target to deliver, whilst others will require resources to be identified and deployed in their delivery across Climate, Emergency Planning, Spatial Planning, Community Planning, CNS and Finance and Resources. These are:</p> <ul style="list-style-type: none"> <li>- Climate Adaptation Planning By 2025, councils will be delivering at least the first iteration of a climate adaptation action plan, linked to a regularly reviewed risk register, in alignment with public body reporting duties brought forward by DAERA.</li> <li>- Corporate Risk and Adaptation Climate change adaptation will be embedded in each council corporate plan by 2029, recognising the challenges of increasing climate impacts over coming decades.</li> <li>- Develop a baseline of Climate Impacts on Finance From 2025, councils will create a climate impact 'tagging' system, to create a baseline of financial impacts on council business operations from severe weather events. This will complement existing Met Office information gathering on non-financial impacts of weather events.</li> <li>- Emergency Planning By 2029, Regional Community Resilience Group (RCRG) will have widened its remit to consider the promotion and development of societal resilience.</li> <li>- Up to and beyond 2029, the Regional Community Resilience Group will continue to work with communities impacted by flooding to enhance preparedness, to better understand requirements for support, and identify what interventions should be prioritised to mitigate the impacts of flooding.</li> <li>- Spatial Planning Councils will ensure local development plans demonstrate how climate adaptation considerations will be embedded in all approval decisions, recognising increasing climate impacts over coming decades.</li> <li>- Local Development Plans will specify that developments are designed using the most up-to-date floodplain definitions from DfI, and councils will publish figures of how many approvals are granted by exception annually.</li> <li>- Green and Blue Infrastructure targets are set by councils to ensure places and people are well informed and more resilient to more intense and frequent flooding and heatwaves.</li> <li>- Community Planning Councils will collaborate through the community planning partnership to undertake work on how adaptation relates to community planning by 2026.</li> <li>- Procurement Councils will ensure that any sustainability/net zero procurement screening includes climate adaptation considerations, to take advantage of co-benefits, ensure consistency and avoid unintended consequences.</li> <li>- Food growing/local ownership Work with sustainable food places partnerships/communities to develop initiatives which enable more local food growing and community-owned food partnerships by 2029.</li> </ul>
3.5	<p><b>Public Consultation Response</b></p> <p>The response to the public consultation is attached in Appendix I for noting purposes.</p>
4.0	<p><b><u>Financial and Resource Implications</u></b></p>
4.1	<p>At this stage there is no immediate resource or financial ask of the Council to respond to this public consultation.</p> <p>Should the actions be adopted, resources will be required across departments to ensure their effective delivery and compliance with the plan. Identifying what the financial and</p>

	resource implications are will require further cross-department consultation and agreement across Council.
<b>5.0</b>	<b><u>Equality or Good Relations Implications/Rural Needs Assessment</u></b>
<b>5.1</b>	<p>While NICCAP3 contains a wide range of policies and proposals which cut across multiple sectors of society, the consultation document states that because NICCAP3 is a high-level programme which serves as a coordination document for these policies and proposals its creation and presentation to the Assembly does not in itself impact on any of the areas covered by the listed assessments. However, as policies and proposals contained within NICCAP3 may impact on each area to varying degrees, it will be the responsibility of the owners of such policies or proposals to ensure they are individually screened or assessed as part of their development as appropriate.</p> <p>As a result of this determination, in each case DAERA has either found there to be no impact from the laying of NICCAP3 at the Assembly or have screened NICCAP3 out from a full assessment.</p>
<b>6.0</b>	<b>Appendices</b> <p>I – Council Public Consultation Response</p> <p>II – <a href="#">DAERA NICCAP 3 Public Consultation Link</a></p>

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

## The Consultation

### About You

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

Organisation

Organisation name:  
Belfast City Council

### Part 1: Introduction - Climate Mitigation vs Climate Adaptation

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

Yes

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

5 - Very aware

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

5 - Very aware

### Legislative Context

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

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

Yes

Additional comments to support your answer.:

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

### A Vision for a Well Adapted Northern Ireland

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

Yes

Additional comments to support your answer.:

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

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

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

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

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

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

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

Yes

Additional comments to support your answer.:

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

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

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

Key Area: Natural Capital

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

Yes

Key Area: Natural Capital

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

No

Additional comments to support your answer.:

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

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

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

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

3

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

3

Key Area: Natural Capital

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

0 - Not at all

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

0- Not at all

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

To provide details:

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

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

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

### Key Area: Food Security

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

Yes

### Key Area: Food Security

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

No

Additional comments to support your answer.:

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

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

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

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

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

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

2

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

3

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

To provide details:

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

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

#### Key Area: Infrastructure Services

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

Yes

#### Key Area: Infrastructure Services

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

Yes

Additional comments to support your answer.:

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

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

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

4

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

3

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

4

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

4

#### Key Area: Infrastructure Services

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

3

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

3

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

3

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

3

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

To provide details:

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

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

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

### Key Area: People and the Built Environment

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

Yes

### Key Area: People and the Built Environment

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

No

Additional comments to support your answer.:

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

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

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

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

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

3

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

3

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

3

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

## Key Area: People and the Built Environment

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

2

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

2

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

2

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

2

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

To provide details:

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

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

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

## Key Area: Disruption to Businesses and Supply Chains

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

Yes

## Key Area: Disruption to Businesses and Supply Chains

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

No

Additional comments to support your answer.:

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

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

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

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

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

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

2

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

2

### Key Area: Disruption to Businesses and Supply Chains

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

2

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

2

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

To provide details:

#### 1. Limited Direct Focus on Supply Chain Disruption

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

#### 2. Procurement Actions Are Framed Narrowly

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

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

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

#### 3. No Mention of Business Continuity

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

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

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

#### 4. Missed Opportunity for Cross-Sector Collaboration

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

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

#### 5. No Support for SMEs

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

### Impact Assessments

49 Do you agree with this decision?

No

Additional comments to support your answer.:

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

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

and in particular vulnerable populations in society.

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